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**Subject:** Electronic Fund Transfers

A majority of states provide benefits for the Special Supplemental Nutritional Program for Women, Infants, and Children (WIC) in the form of a voucher, or check. This payment instrument typically contains a micr-encoded value at the bottom of the instrument that represents a unique benefit identifier and it sometimes includes a bank routing information. Although this payment instrument currently is not processed electronically, it certainly lends itself easily to electronic check processing, and if that does occur, transactions initiated in such a manner should have the same exemptions any needs-tested benefit programs currently have under regulation E.

- Edward Oppenheimer