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Subject: COVID-19: CA Expedited Online Purchasing Approval
Date: Thursday, April 2, 2020 7:36:38 AM
Attachments: CA SNAP-COVID-P_Expedited OnlinePurchasing Plan.pdf

WRO Team,

Please consider this FNS' approval of California's attached request to provide online purchasing to SNAP Households in the State of California.

This approval will allow the State to expedite the implementation of online purchasing with **currently authorized** SNAP online retailers.

If the State intends to move forward with other retailers, that will require additional planning steps and activities with the new retailer(s), including SNAP online retailer authorization and end-to-end testing with FNS prior to their participation.

The State will inform FNS of any changes or modifications to the implementation of this plan and any potential corresponding impacts to the expected implementation date. Upon confirmation of receipt of this approval, please provide the State's preferred primary point of contact for this project for technical conversations that will be necessary for implementation.

Thank you, and please let us know if you have any questions.

Andrea

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California Plan for Providing Online Purchasing to SNAP Households

1. **Type of Request:** Initial
2. **Primary Citation:** Families First Coronavirus Relief Act
3. **State:** California
4. **Proposed Alternative Procedures:**

The California Department of Social Services (CDSS) is responding to the impacts of the Coronavirus Disease 2019 (COVID-19) and is requesting administrative flexibilities from the US Department of Agriculture, Food and Nutrition Service (FNS) to ensure California's residents continue to receive SNAP benefits and readily access food. To this end, CDSS requests approval to authorize retail food stores to accept SNAP benefits via online transactions. This request mirrors implementation of online purchasing with SNAP benefits under the Electronic Benefit Transfer (EBT) Online Purchasing Pilot. Approval of this plan will allow households across California to purchase eligible food items online using SNAP benefits.

Requirements

California has discussed feasibility with our vendors and stakeholders. All vendors and stakeholders understand the urgency and need for an expedited implementation timeline given the current state of emergency, statewide shelter in place order and, as of March 23rd, presidential Major Disaster Declaration.

The CDSS, in coordination with the California Office of Systems Integration (OSI), California's EBT vendor, retailers, the Third Party Processor (TPP) vendor, and the Statewide Automated Welfare Systems, has completed a technical assessment and has concluded that California can feasibly implement this solution within three weeks of FNS plan approval. As part of the technical assessment, all changes necessary for online purchasing were fully reviewed and vetted for potential systemic impacts driven by system changes.

Because this request is being made in response to an emergency, California proposes to implement SNAP online purchasing in partnership with currently approved online retailers. Amazon and Walmart operate in California and both have been approved to participate in the existing SNAP EBT Online Purchasing Pilot in other states. Additionally, both retailers are currently contracted with Fiserv, which provides these retailers the ability to collect PINs and process EBT purchases online. California is also working with Safeway, an FNS approved and scalable vendor, to bring online EBT to fruition across the State as part of this approval. California strongly urges FNS to consider opportunities to expedite approval of additional vendors with online capacity in order to expand access further, subsequent to initial rollout. California stands at the ready to support other retailers to provide online access and establish all technical needs to provide this service, including online PIN capture functionality.

By submitting this plan to FNS, the State is confirming/acknowledging the following:

- A change order has been initiated with California's EBT Processor for these changes and an agreement has been reached as to how costs will be covered.
- This plan has been discussed with the EBT Processor, the TPP/Secure PIN-entry provider, and the experienced retailers currently authorized for online purchasing. All parties agree they can support the proposed implementation date. A letter of commitment from each of these stakeholders is attached to this plan.
- The implementation timeline includes the following activities:
 - Full documentation of the changes to the EBT system.
 - Quality Assurance testing of the EBT system to include not only online purchasing functionality, but also regression testing of point of sale transaction processing.
- The changes necessary for online purchasing have been fully reviewed such that California was able to subsequently assess any downstream impacts of these changes.
- California has developed a detailed timeline, is able to make the necessary updates to state systems by the implementation date, and will have the necessary technical resources to meet the timeline and requirements.
- EBT test cards will be provided to retailers such that end-to-end testing is conducted in the production environment and passed prior to allowing online purchasing to SNAP households. This testing will include all stakeholders of this project including: CDSS, OSI, FIS, the TPP, the retailers, and FNS. This testing involves the retailer running standard transaction scenarios on their website (successful purchase, insufficient funds, invalid PIN, balance inquiry, split tender, etc.) and verifying that the transactions execute as expected and that transaction details are viewable in the EBT system.

Reporting

The CDSS commits to report to FNS regarding project development status as detailed in this plan at least weekly via email. The CDSS will inform FNS of any changes or modifications to the implementation of this plan and any potential corresponding impacts to the expected implementation date.

5. Justification for Request:

California has experienced a rapid increase in the spread of COVID-19. Extensive public health warnings have been issued statewide to reduce exposure, including orders to implement social distancing when conducting essential business, eliminate group gatherings, and require home isolation for vulnerable populations, including all people aged 65 years of age or older. More recently, a statewide shelter-in-place order was implemented by Executive Order of our Governor. These restrictions may be in place for weeks and months to come. During this time, Californians will need to meet their food needs while reducing in-person interactions. For some SNAP households, this may require grocery home delivery.

Currently, SNAP households must use their EBT card in-person at participating grocery stores, farmers markets, and restaurants that participate in the Restaurant Meals Program. The FNS nutrition assistance programs play a critical role in responding to food assistance needs during a human pandemic such as this. Yet, the requirement to complete a purchase with SNAP benefits in-person may pose a risk to vulnerable Californians. To reduce the likelihood of exposure and mitigate the spread of COVID 19, while ensuring households have adequate access to food, California is requesting to expedite the implementation of a practice already proven successful in other states.

Allowing SNAP households to purchase food online will increase participation in public health recommended practices and mitigate risk associated with exposure to COVID-19. Approval of this request will have a positive impact on households that may not have the ability to make SNAP purchases in person during a public health crisis.

6. Affected Caseload:

Upon approval of this plan, CDSS will allow all SNAP households to participate in online purchasing, ensuring equitable and immediate access to food for all Californians. As we continue to participate in a statewide stay-at-home order and as public health restrictions continue to increase, in-person purchases are more challenging and less accessible to SNAP households.

7. Anticipated Implementation Date:

California currently anticipates an implementation date of April 19, 2020.

As detailed in our plan, the CDSS has discussed and adequately prepared for implementation of online purchasing with our implementing grocery vendors (Walmart and Amazon) and technical stakeholders to ensure functionality can be tested and launched under our current expedited timeline of three weeks upon FNS approval of this plan. All primary stakeholders understand the urgency to ensure our clients are able to participate in online food purchasing as the global pandemic continues to threaten the health, safety, and well-being of our most vulnerable populations.

8. Signature and Title of Requesting State Agency Official:



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9. Date of Request: March 30, 2020.