

STATE WAIVER REQUEST

State Plan for Providing Online Purchasing to Supplemental Nutrition Assistance Program (SNAP) Households

1. **Type of request:** Initial

Primary citation: Implementation of Expedited Online Purchasing Option for SNAP due to Covid-19 and the National Emergency declared on March 13, 2020.

~~Section 7(k) of the Food and Nutrition Act of 2008 (the Act)~~

2. **State:** District of Columbia

3. **Region:** MARO

~~4. **Requirements:** Section 7(k)(1) of the Act provides authority to the Secretary of Agriculture to approve retail stores to accept SNAP benefits through online transactions. Section 7(k)(4) of the Act requires a number of demonstration projects be performed to test the feasibility of allowing retail food stores to accept SNAP benefits online in all States before authorizing implementation of paragraph (1). Section 2302(a)(2) of the Families First Coronavirus Response Act permits the Secretary of Agriculture to adjust SNAP issuance methods to be consistent with what is practicable under actual conditions in affected areas.~~

5. **Proposed alternative procedures:** The District of Columbia (District) proposes to **adjust issuance methods** to provide online purchasing as an option to SNAP households in response to the outbreak of COVID-19 that was declared a National Emergency on March 13, 2020, resulting in many individuals needing to self-quarantine and engage in social distancing, which in turn has made it challenging for some SNAP households to travel to stores to purchase food. **What issuance method adjustments are these referring to; SNAP EBT issuance should have no impact on the operation of OPP.**

The District acknowledges that an expedited timeframe for this project carries some inherent risks, such as potential disruption to normal Electronic Benefit Transfer (EBT) transaction processing if the changes are not thoroughly tested before implementation. The requirements outlined below allow the District to address how these risks would be mitigated.

Requirements: By submitting this plan to the US Department of Agriculture, Food and Nutrition Service (FNS), the District is confirming/acknowledging the following:

- A change order **will be initiated** with the EBT Processor for these changes or an agreement will be reached as to how costs will be covered.
 - FIS, our EBT contractor, indicated that approval of this request by FNS is needed before a change order is initiated. **As mentioned FNS needs a copy of the proposed change order for our review and approval.**
- The District's plan will be discussed with the contracted EBT Processor, the Third Party Processor/Secure PIN-entry Provider (TPP) and the experienced retailers currently authorized for online purchasing. An implementation date

will be set based on these conversations and letters of commitment will be sent to FNS. **Have you had discussions with all three stakeholders and is there and estimated date of implementation? Please provide a list of the retailers that will be participating in OPP in DC. When could we expect the required letters of commitments from all parties?**

- The timeline in this plan includes the following activities:
 - Full documentation of the changes to the EBT system or a plan for how/when such documentation will be received. **Please provide the specifics regarding the changes to the EBT system.**
 - Quality Assurance (QA) testing of the EBT system to include not only online purchasing functionality but also regression testing of point of sale transaction processing. **Please provide details of your QA testing plans.**
 - The changes necessary for online purchasing will be fully reviewed such that the District is able to subsequently assess any downstream impacts of these changes to our system. **Please provide details of your process to ensure that these OPP changes will not adversely affect either DCAS or EBT issuance.**
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- The District will develop a detailed timeline and will be able to make the necessary updates to our system by the implementation date and will have the necessary technical resources to meet the timeline and requirements. **Please provide the specific details and list of the updates that will be needed to implement OPP along with a timeline for implementation.**
 - EBT test cards will be provided to retailers such that end-to-end testing is conducted in the production environment and passed prior to opening up online purchasing to SNAP households. This testing will include all stakeholders of this project including: the District, the EBT Processor, 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 the District is able to view the transaction details in our EBT system. **Please provide the specific details for the required testing along with a timeline for implementation.**

Reporting: The District commits to report to FNS regarding project development status (via email or phone call) at least weekly, and to inform FNS of any changes to the implementation plan or expected launch date. **Please provide FNS the point of contact that will be providing reports and updates on the OPP implementation.**

6. Justification for request:

Coronavirus COVID-19

- The Secretary of Health and Human Services declared a Public Health Emergency under section 319 of the Public Health Service Act as a result of COVID-19 retroactive to January 27, 2020.¹
- The Mayor of the District of Columbia declared a Public Emergency and a Public Health Emergency as a result of the COVID-19 effective March 11,

2020 and extended on March 20, 2020.²

- On March 24, 2020, the Mayor of the District of Columbia ordered the temporary closure of non-essential business and prohibition of gatherings of 10 or more people effective March 25, 2020 and expiring April 24, 2020.³
- On March 17, 2020, the Washington Metropolitan Area Transit Authority (WMATA) announced major service reductions to the rail and bus systems serving District residents. Currently, 19 metro rail stations are closed without alternative service or shuttles and bus service with reduced frequencies and routes.⁴

As a result of the COVID-19 pandemic, resulting Mayoral orders in place, and increase in COVID-19 positive tests⁵ in the District, some SNAP households are facing significant challenges in purchasing food using their SNAP EBT cards. As the District's public transportation system, WMATA, has implement major service reductions, some SNAP households have no way to access grocery stores to purchase essentials and are forced to purchase foods at convenience stores they can walk to. Finally, the District's elderly/disabled SNAP customers face increased health risks when visiting their local stores to purchase food using their EBT cards.

7. **Affected Caseload:** Any **SNAP** households in the District will be able to utilize online purchasing.
8. **Anticipated implementation date and time period for which waiver is needed:** Implementation of online purchasing would occur as quickly as feasible based on finalized plans. **Please provide an estimate of the implementation date of OPP in DC as well as the anticipated period of operation.**
9. **State agency submitting waiver request and State contact person:**

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Economic Security Administration
Department of Human Services
District of Columbia Government
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10. **Signature and Title of Requesting State Agency Official:**



Title: Administrator, Economic Security Administration,
Department of Human Services,
District of Columbia Government
Email for transmission of response: Anthea.Seymour@dc.gov

11. **Date of request:**

March 30, 2020