

## State Plan for Providing Online Purchasing to SNAP Households

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

**1. Type of Request:** Initial

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

**3. State:** Florida

**4. Proposed Alternative Procedures:**

The State of Florida is responding to the impacts of the public health emergency, periods of social distancing, and Governor DeSantis' executive order issued on April 1, 2020 requiring individuals to limit their movements and personal interactions outside of their home to only essential services and activities. Florida is requesting administrative flexibilities from the US Department of Agriculture, Food and Nutrition Service (FNS) to ensure Florida's residents continue to receive SNAP benefits and access to food. Florida requests approval to authorize retail food stores to accept SNAP benefits via online transactions with an Electronic Benefits Transfer (EBT) card. Approval of this plan will allow households across Florida to purchase eligible food items online using SNAP benefits.

Florida proposes 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.

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

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

- A change order has been initiated with the EBT Processor for these changes.
- This plan has been discussed with the contracted EBT Processor, the Third-Party Processor/Secure PIN-entry Provider (TPP) and the experienced retailers **currently authorized for online purchasing**, and all parties agree they can support an implementation date of April 16, 2020 for a pilot in Leon County for Walmart with statewide implementation anticipated on April 21, 2020. **A letter of commitment from each of these stakeholders is attached to this plan.**
- 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.

- Quality Assurance (QA) testing of the EBT system to be completed in coordination with the Department, each retailer (Walmart and Amazon), FISERV, Fidelity National Information Systems (FIS), and FNS. Testing will begin on April 13, 2020 and 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 the State was able to subsequently assess any downstream impacts of these changes to their State system(s).
- The State has developed a detailed timeline and is able to make the necessary updates to their 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 opening up online purchasing to SNAP households. This testing will include all stakeholders of this project including: the State, the EBT Processor, the TPP, the retailers and FNS. This testing involves the retailer running standard transaction scenarios on the their website (successful purchase, insufficient funds, invalid PIN, balance inquiry, split tender, etc...) and verifying that the transactions execute as expected and the State is able to view the transaction details in their State EBT system.

**Reporting:** The State 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.

**5. Justification for Request:** Coronavirus (COVID-19)

**6. Affected Caseload:** Florida has discussed and adequately prepared for implementation of online purchasing with the experienced retailers, Walmart and Amazon, and technical stakeholders to ensure functionality can be tested and launched under our proposed timeline.

Upon approval of this plan, Florida will pilot with Walmart in Leon County beginning April 16, 2020. Beginning April 21, 2020, the pilot will be implemented statewide with both retailers and allow any SNAP household to utilize online purchasing.

**7. Anticipated Implementation Date:** April 16, 2020

**8. Signature and Title of Requesting State Agency Official:**

*Taylor N. Hatch*

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Taylor Hatch, Assistant Secretary, Economic Self-Sufficiency

**9. Date of Request:** April 10, 2020