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


3. **State**: Idaho

4. **Proposed Alternative Procedures**:

In response to the continuing impacts of the Coronavirus Disease 2019 (COVID-19), The Idaho Department of Health and Welfare (Department) is requesting administrative flexibilities from the US Department of Agriculture, Food and Nutrition Service (FNS) to ensure Idaho’s residents continue to receive SNAP benefits and readily access food. The Department is requesting 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 Idaho to purchase eligible food items online using SNAP benefits.

The State acknowledges an expedited timeframe is needed to meet the ongoing needs of SNAP customers and proposes the below requirement to successfully allow for online purchasing through approved vendors.

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

- A change order has been initiated with the EBT Processor for these changes or an agreement has been reached as to how costs will be covered.
- 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 no later than May 17, 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.
  - QA testing of the EBT system (either by the processor or the State) 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 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...
The Department commits to report to FNS regarding project development status as detailed in this plan at least weekly via email. The Department 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:

After the first positive case, Idaho experienced a rapid increase in the spread of COVID-19. Idaho’s Governor declared a state of emergency on March 13, 2020. On March 25, 2020, the Governor imposed an immediate 21-day stay at home order and closure of all non-essential businesses, which is expected to be extended at the time of waiver submission. It is difficult to determine if this order will continue for weeks or months. As of April 6, 2020, all Idaho public schools have been closed for the remainder of the school year. 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 and with health conditions that put them at higher risk of contracting the illness. During this time, all Idahoans continue to need to purchase foods, with minimal or no in-person interactions. For many SNAP households, the inability to purchase online is creating hardships and putting them at greater risk. Blaine County, the site of the first positive case of COVID-19, currently has one of the highest cases per capita in the country. It was the first area in Idaho placed on a shelter-in-home order beginning March 19, 2020. By the end of March, the county also imposed more restrictive requirements than other areas of the state. Among those requirements, it restricts residents in the area from leaving the county to purchase items that can be found in the area. It also requires residents and visitors returning to the county from out-of-state to self-quarantine for 14 days. Blaine County has limited retail options for low-income families receiving SNAP benefits. Many SNAP households without the ability to travel to retail stores outside of the area, are turning to the local foodbank requesting food delivery, further taxing the food supply in this rural part of Idaho.

Currently, SNAP households must use their EBT card in-person at participating grocery stores and farmers markets. 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 Idahoans. To reduce the likelihood of exposure and mitigate the spread of COVID 19, while ensuring households have adequate access to food, Idaho 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, all SNAP households in the state will be able to utilize online purchasing through approved.

7. **Anticipated Implementation Date:** On or before May 17, 2020

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

   *Julie A. Hammon*

   Julie A. Hammon, Administrator

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