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DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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**GAVIN NEWSOM**  
GOVERNOR

March 20, 2020

Mr. Charles Tobin, Regional Program Director  
Supplemental Nutrition Assistance Program  
Western Regional Office  
Food and Nutrition Service  
90 Seventh Street, Suite 10-100  
San Francisco, CA 94103

**SUBJECT: CALIFORNIA REQUEST TO IMPLEMENT EBT ONLINE PURCHASING**

Dear Mr. Tobin:

As the California Department of Social Services (CDSS), CalFresh and Nutrition Branch responds to the effects of the Coronavirus Disease 2019 (COVID-19) and seeks to continue the effective administration of the Supplemental Nutrition Assistance Program (SNAP), we are requesting flexibilities from the US Department of Agriculture (USDA) Food and Nutrition Service (FNS) to ensure California's residents continue to receive SNAP benefits and readily access food.

Under current conditions related to the Statewide stay at home order issued by the Governor on March 19, 2020, California will be requesting temporary waivers to ensure continued access to nutrition through more effective and efficient administration of SNAP. Ahead of our first waiver request in response to the COVID-19 pandemic, CDSS is requesting approval to authorize retail food stores to accept SNAP benefits via online transactions. This request mirrors implementation of online purchases with SNAP benefits under the EBT Online Purchasing Pilot.

Approval of this request will allow households across California to purchase eligible food items online using SNAP benefits.

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 to require home isolation for vulnerable populations, including all people aged 65 years of age or older. 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, 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.

Because this request is being made in response to an emergency, California proposes to implement SNAP online purchasing in partnership with only existing FNS 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 with 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.

The CDSS, in coordination with the California Office of System Integration, California's EBT vendor, and the Statewide Automated Welfare Systems, has completed a technical assessment and has concluded that California can feasibly implement this solution within two to three weeks of request approval. The CDSS does not anticipate any impact on overall agency operations.

In addition, California strongly urges FNS to consider opportunities to expedite approval of additional vendors with online capacity in order to expand access further. 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.

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.

We appreciate FNS' consideration of California's request and appreciate a prompt response in order to start making necessary changes to our system and communicating this change to clients. In addition, to expedite the review and decision process for California's request, we are available for a conference call at your earliest convenience.

If you have any questions, please do hesitate to contact me at [alexis.fernandez@dssc.a.gov](mailto:alexis.fernandez@dssc.a.gov) or 916-653-65162.

Sincerely,  
Alexis Fernández  
Chief, CalFresh and Nutrition Branch  
California Department of Social Services