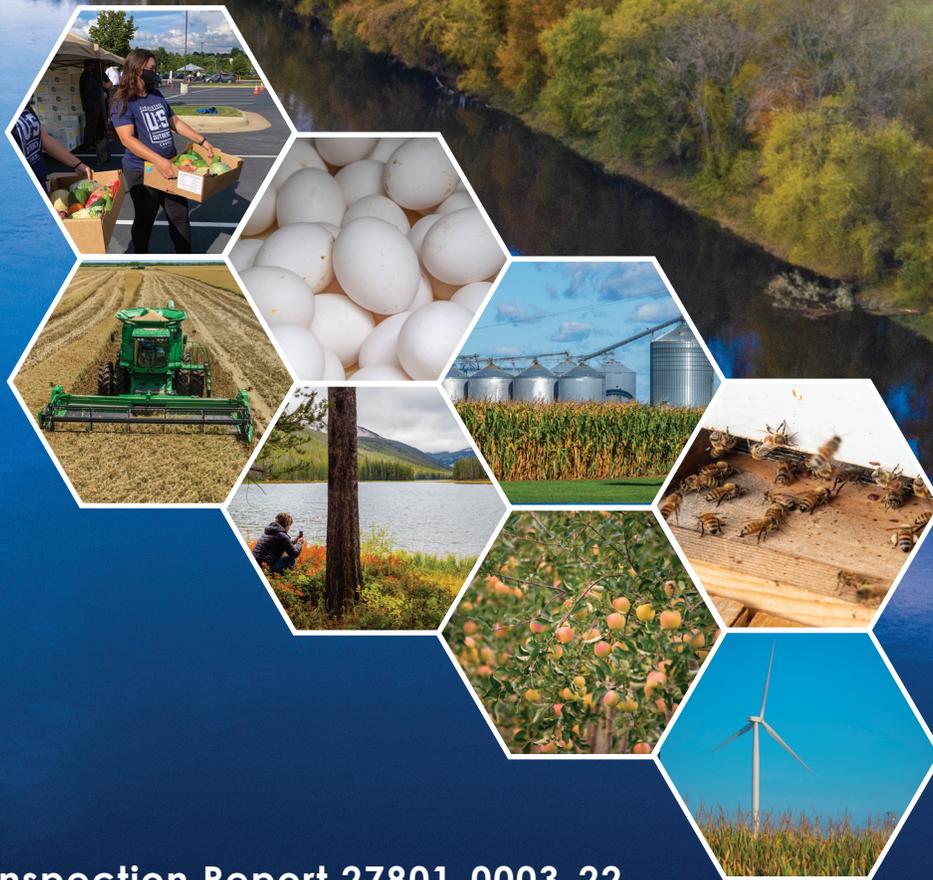


COVID-19—Supplemental Nutrition Assistance Program Online Purchasing in Response to the Coronavirus Disease 2019



Inspection Report 27801-0003-22

August 2021

OFFICE OF INSPECTOR GENERAL

COVID-19—Supplemental Nutrition Assistance Program Online Purchasing in Response to the Coronavirus Disease 2019

Inspection Report 27801-0003-22

OIG reviewed FNS' controls over the SNAP Online Purchasing Pilot in response to the COVID 19 pandemic.

OBJECTIVE

Our objectives were to address the following questions: (1) What criteria did FNS use to approve States and retail food stores to accept SNAP benefits through online transactions during COVID-19? (2) What risks has FNS identified during the transition to allow SNAP benefits online? (3) What controls does FNS have to ensure retail food stores meet online transaction program requirements?

WHAT OIG FOUND

In 2014, the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS) initiated a Supplemental Nutrition Assistance Program (SNAP) Online Purchasing Pilot (pilot), which would allow households to make online purchases using SNAP benefits. The pilot requires online transactions to be secure, private, easy to use, and provide similar support to that found for SNAP transactions in a retail store. In response to the coronavirus disease 2019 (COVID-19) pandemic, FNS expanded the pilot from 6 States in March 2020 to 46 States by the end of December 2020. Between March and December 2020, the total value of online SNAP purchase transactions increased from more than \$18.9 million to more than \$1.5 billion cumulatively.

REVIEWED

We reviewed FNS' process for approving States and retailers through June 2020, and analyzed SNAP Online Purchasing Pilot data related to online transactions through December 2020.

We found that FNS used the same approval criteria it used for the original pilot selections when adding additional States and retailers. We also identified that FNS has not updated its risk assessment of the SNAP Online Purchasing Pilot since creating the pilot in 2014. Without updating its risk assessment to assess new risks in the rapidly evolving e-commerce market, the pilot could be susceptible to fraud and abuse—particularly as FNS rapidly expanded the pilot between March and December 2020.

RECOMMENDS

FNS should perform an updated risk assessment and establish a policy to periodically perform assessments to identify any new risks and re-evaluate existing ones. FNS should also establish controls for monitoring, evaluating, and documenting retailers' requirements pertaining to the use of SNAP participants' personal information.

Finally, although we found FNS had established criteria and program requirements for retailers to be eligible to participate in the pilot, FNS did not establish controls to effectively monitor, evaluate, or document how participating retailers protect SNAP participants' online personal information. Instead, the agency relied on retailers' assurance and attestation that online retailers will protect the privacy of SNAP participants' information. In order to proactively ensure that SNAP participants' personal information is not compromised, sold, shared, or given to any third party without authorization, FNS needs to better monitor, evaluate, and document retailers' compliance with safeguarding participants' personal information.

FNS generally concurred with our findings and recommendations, and we accepted management decision on all recommendations.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: August 25, 2021

INSPECTION

NUMBER: 27801-0003-22

TO: Cindy Long
Acting Administrator
Food and Nutrition Service

ATTN: Melissa Rothstein
Director
Office of Internal Controls, Audits and Investigations

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: COVID-19—Supplemental Nutrition Assistance Program Online Purchasing in Response to the Coronavirus Disease 2019

This report presents the results of the subject review. Your written response to the official draft is included in its entirety at the end of the report. We have incorporated excerpts from your response, and the Office of Inspector General's (OIG) position, into the relevant sections of the report. Based on your written response, we are accepting management decision for all 3 inspection recommendations in the report, and no further response to this office is necessary. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer (OCFO).

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than OCFO, please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our inspection fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>) in the near future.

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Background and Objectives

Background

The Supplemental Nutrition Assistance Program (SNAP), administered by the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS), provides nutrition benefits to supplement the food budgets of needy families so they can purchase healthy food and move towards self-sufficiency. The 2014 Farm Bill mandated a demonstration project to test the feasibility and implications of allowing retail food stores (retailers) to accept SNAP through online transactions.^{1, 2} In 2014, FNS initiated a SNAP Online Purchasing Pilot (pilot), which would allow households to make online purchases using SNAP electronic benefits transaction (EBT) cards. The pilot requires these transactions to be secure, private, easy to use, and provide similar support to that found for SNAP transactions in a retail store. The use of SNAP benefits to pay fees of any type—such as delivery, service, or convenience fees—is not allowed.

On September 15, 2016, FNS released a request for retailer volunteers to solicit applications for a 2-year SNAP Online Purchasing Pilot. On January 5, 2017, FNS announced the selection of eight pilot States and seven retailers for the initial pilot launch.³ As of March 2020, six States and four retailers were participating in the pilot program (see Figure 1).⁴

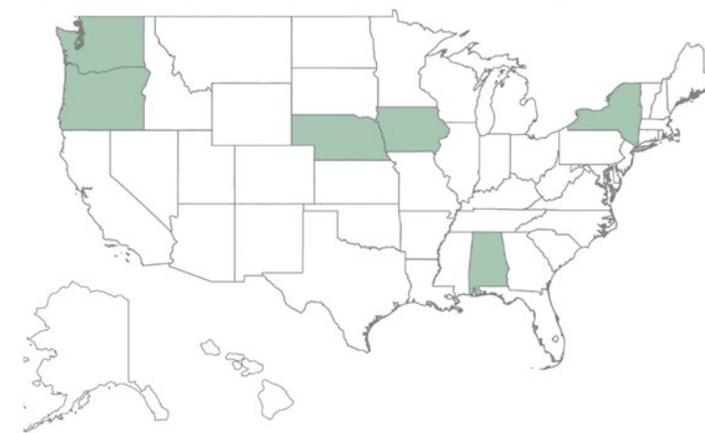


Figure 1. In March 2020, Six States Accepted SNAP Online Transactions.

In March 2020, due to the coronavirus disease 2019 (COVID-19) pandemic, health officials recommended limiting visits to grocery stores and ordering food online for home delivery or curbside pickup if possible. Other factors, such as limited or halted public transportation and increased warnings for high-risk individuals, also impeded some SNAP recipients' ability or willingness to visit supermarkets. In response to the pandemic, FNS approved in quick succession other States to participate in the SNAP Online Purchasing Pilot, and there was a steep

¹ Agricultural Act of 2014, Pub. L. No. 113-79, 128 Stat. 649 (2014 Farm Bill).

² The demonstration project is referred to as the SNAP Online Purchasing Pilot in this report.

³ The eight States selected to be part of the pilot were Alabama, Iowa, Maryland, Nebraska, New Jersey, New York, Oregon, and Washington.

⁴ The six States participating in the pilot in March 2020 were Alabama, Iowa, Nebraska, New York, Oregon, and Washington. In response to the pandemic, FNS approved States not part of the original pilot beginning in April 2020.

rise in online SNAP monthly transactions. By the end of December 2020, online SNAP benefits were expanded to 46 States and Washington, D.C. Therefore, participating households and online SNAP benefits redeemed increased greatly, as noted in Figure 2.

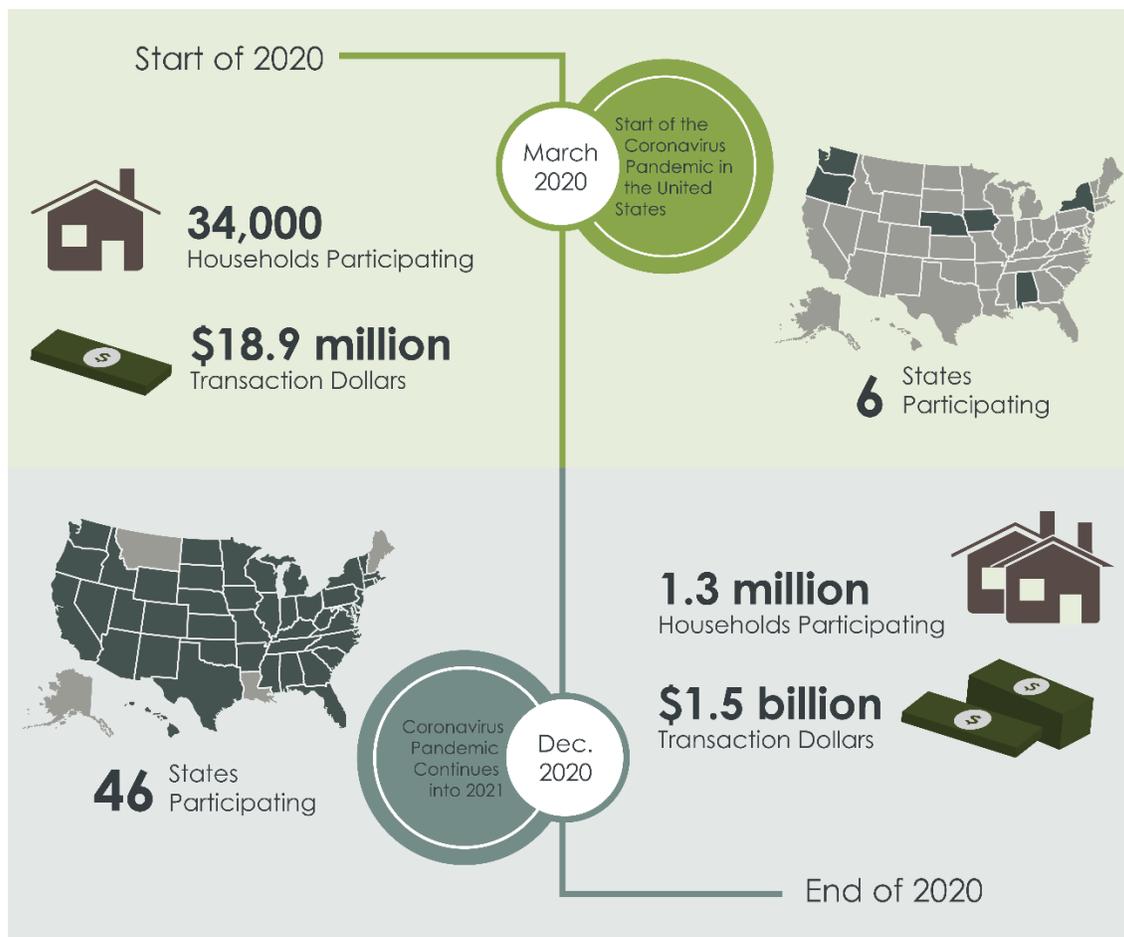


Figure 2: The Expansion of the SNAP Online Pilot in Response to the Pandemic.

Objectives

Our objectives were to address the following questions:

1. What criteria did FNS use to approve States and retail food stores to accept SNAP benefits through online transactions during COVID-19?
 - a. How were FNS criteria different from the criteria used for approving the original demonstration projects?
 - b. What impact, if any, could changes to the criteria have on the integrity of the program?
2. What risks has FNS identified during the transition to allow SNAP benefits online?
 - a. What risks did FNS accept without implementing an internal control?
 - b. What controls did FNS establish to manage those risks it did not accept?
3. What controls does FNS have to ensure retail food stores meet online transaction program requirements?

Objective 1: What criteria did FNS use to approve States and retail food stores to accept SNAP benefits through online transactions during COVID-19?

- a. How were FNS criteria different from the criteria used for approving the original demonstration projects?**
- b. What impact, if any, could changes to the criteria have on the integrity of the program?**

After the pandemic began in March 2020, FNS used the same criteria, from the request for volunteers (RFV) handbook, that the agency used to establish the pilot selections to authorize additional States and retailers to accept SNAP benefits through online transactions.⁵ We determined that there was no impact to the integrity of the program since FNS did not change its approval criteria.

FNS used the RFV handbook both when the agency established the pilot and after the start of the pandemic. The handbook describes the application and selection process FNS uses to enroll retailers in the pilot. It also outlines the legislative, regulatory, and operational requirements for participation in the pilot. For example, the handbook outlines the requirements retailers must meet in order to participate in the pilot, including security and privacy, transaction processing, and online checkout process requirements. The handbook also outlines FNS' and the EBT processors' responsibilities in the online pilot.

While the criteria remained the same after the start of the pandemic, FNS created a new, simplified application to quickly expand the pilot to additional States. Before the pandemic, interested retailers initiated the application process and submitted a 12-page application from the RFV handbook. These retailers were responsible for coordinating with the States where they wished to operate. As a result of the pandemic, in March 2020, FNS developed a simplified, 3-page application to allow the pilot to expand to new States.⁶ The 3-page application allowed additional States to initiate the application process and participate in the pilot using currently approved retailers. FNS continues to use the 12-page application from the RFV to approve new retailers for the SNAP Online Purchasing Pilot.

⁵ USDA FNS, *Electronic Benefits Transfer Online Purchasing Pilot Request for Volunteers* (Sep. 15, 2016).

⁶ In a press release on April 8, 2020, USDA announced that FNS had created a simplified template to ease the process for States wishing to enter the pilot.

Objective 2: What risks has FNS identified during the transition to allow SNAP benefits online?

- a. What risks did FNS accept without implementing an internal control?**
- b. What controls did FNS establish to manage those risks it did not accept?**

FNS has not updated its risk assessment of the SNAP Online Purchasing Pilot since the pilot was created in 2014. This occurred because FNS did not establish a process to periodically assess and document risks that could impact the integrity of this pilot. Without updating its risk assessment, the pilot could be susceptible to fraud and abuse—particularly as FNS rapidly expanded the pilot from 6 States in March 2020 to 46 States by December 2020. Between April 2019 and March 2020, SNAP recipients used more than \$18.9 million in SNAP benefits to purchase groceries online. By the end of December 2020, online SNAP purchase transactions increased to more than \$1.5 billion cumulatively.

The Office of Management and Budget (OMB) Circular A-123 states that identifying risk is a continuous process. Agencies must regularly review and monitor risk to identify whether it still exists, new risks have arisen, and changes have occurred in the likelihood and impact of risks.⁷ The Standards for Internal Control in the Federal Government states that changing conditions often create new risks, or changes to existing risks can prompt management to perform a risk assessment to identify, analyze, and respond to any new, resulting risks.⁸

Due to the pandemic, FNS expanded the pilot from the original eight States and seven retailers announced in 2017 to allow all States and retailers to apply for participation. This swift expansion of the pilot beginning April 2020 changed the condition, which created the opportunity for new risks to emerge. Because of the potential for new or changing risks, we asked FNS officials for all risk assessment documentation related to the pilot since the pandemic started.

In response to our request, FNS officials provided a risk assessment of the SNAP Online Purchasing Pilot. However, we found that FNS had not updated its risk assessment since it was performed in 2014. The risk assessment identified a total of 11 risks.⁹ For each risk, FNS presented how the risk was identified and possible mitigation and method of testing. Of the 11 risks identified for the pilot, FNS determined that none was greater than moderate.¹⁰ While we consider this to be an important assessment, the document shared did not describe how the assessment was prepared, who prepared it, or the date it was completed. When we requested clarification, FNS responded that the risk assessment was prepared by SNAP personnel and industry representatives in 2014. According to FNS, the purpose of the risk assessment was to

⁷ OMB, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Circular A-123 (July 15, 2016).

⁸ Government Accountability Office, *Standards for Internal Control in the Federal Government* (Sep. 2014).

⁹ FNS considers these areas of risk as potential issues related to retailers participating in the pilot.

¹⁰ In contrast, SNAP is identified as a high-risk program under the Improper Payment Information Act of 2002, as amended. OMB Circular A-123 states high risks could preclude or highly impair an entity's ability to achieve its goals, while a medium risk could significantly affect the entity's ability to achieve its goals.

determine whether to move forward with a pilot. Further, FNS officials stated they applied the same risk assessment prepared in 2014 to expand the pilot due to the pandemic because they had not identified any new threats.

We determined that personnel did not identify new threats, or update existing risks or mitigation measures because FNS had not established a process to periodically assess and document risks that could impact the integrity of its SNAP Online Purchasing Pilot. We asked FNS how many re-evaluations of the 2014 assessment were completed and whether they have identified new risks or changed the risk level for the original risks identified in 2014. FNS officials stated that monitoring risk is part of the ongoing evaluation of the pilot implementation and operation, adding that they continuously monitor the pilot and online transactions for fraud detection. Although FNS officials stated that the evaluation of risks is ongoing within the pilot, the documentation provided was not sufficient to ascertain when reviews were conducted or the extent of the reviews. We also asked which of the risk(s) identified in the assessment FNS determined to tolerate and which risk(s) they could not tolerate and, therefore, implemented controls to mitigate the risk(s). FNS officials responded that FNS will do all it can to mitigate the risk(s) identified; however, the documentation provided was not sufficient to identify the tolerance for the risk(s).

As stated in the Background section of this report, the SNAP Online Purchasing Pilot saw a significant increase after the start of the pandemic. From April 2019 to March 2020, six States were participating, with a total transaction amount of more than \$18.9 million. By December 2020, 46 States and Washington, D.C., were participating, with a total transaction amount of more than \$1.5 billion cumulatively.

While offering SNAP recipients access to purchase groceries online in the midst of a pandemic is a positive step, the rapid expansion potentially leaves the pilot susceptible to the risk of fraud and abuse.¹¹ E-Commerce is a quickly expanding market with evolving technology and risks. FNS' risk assessment from 7 years ago may not identify risks in an evolving market. Risk assessments can help FNS identify and mitigate hazards; however, the effectiveness of these assessments relies upon current information. Therefore, FNS should regularly assess whether new risks have arisen or whether the controls in place are sufficient to mitigate those potential hazards. In order for FNS to both provide valuable online SNAP service and ensure the safety and efficacy of these transactions, FNS needs to update its risk assessment and establish a policy to periodically conduct these assessments.

Recommendation 1

Perform and update the SNAP Online Purchasing Pilot risk assessment to reflect how FNS will mitigate and test potential risks.

Agency Response

¹¹ During our inspection, no indication of retailer or recipient fraud came to our attention.

FNS concurs with this recommendation and will review, update (if/as necessary), and formally document the results of the SNAP Online Purchasing Pilot risk assessment, including testing and risk mitigation.

OIG Position

We accept FNS's management decision on this recommendation.

Recommendation 2

Establish a policy to periodically perform assessments to identify any new risks and re-evaluate existing ones related to the SNAP Online Purchasing Pilot.

Agency Response

FNS concurs with this recommendation. FNS will establish internal operational guidance (policy) to undertake the process described in response to Recommendation 1 on a periodic basis, to identify new risks or changes to existing risks.

OIG Position

We accept FNS's management decision on this recommendation.

Objective 3: What controls does FNS have to ensure retail food stores meet online transaction program requirements?

Although we found FNS had established criteria and program requirements for retailers to be eligible to participate in the pilot, FNS could not illustrate how the agency verified that the four retailers we reviewed complied with privacy practices and policies to participate as EBT online retailers.¹² FNS did not establish controls to effectively monitor, evaluate, or document how participating retailers are protecting SNAP participants' online information. Instead, the agency relied on retailers' assurance and attestation that online retailers will protect the privacy of SNAP participants' information. In order to proactively ensure that SNAP participants' personal information is not compromised, sold, shared, or given to any third party without authorization, FNS needs to better monitor, evaluate, and document retailers' compliance with safeguarding participants' personally identifiable information (PII).

According to OMB Circular A-123, Federal agencies are ultimately responsible for the services and processes provided by third-party service organizations as they relate to the agency's ability to maintain internal control over operations, reporting, and compliance with laws and regulations.¹³ If the processes provided by the third-party service organization are significant to an agency's internal control objectives, then the agency is responsible for establishing controls that complement the third-party controls. Additionally, FNS' RFV handbook states, that due to privacy requirements, FNS must ensure that personal information such as name, address, or email address collected by SNAP online retailers is not compromised, sold, rented, or given away to any third party without authorization.¹⁴ The RFV handbook also requires third-party websites that share data at the individual level to obtain explicit consent from EBT customers to release such information. The RFV handbook states "the EBT customer must "opt in" to allow such sharing and not have to "opt out" to prevent the sharing."¹⁵

FNS is responsible for managing, monitoring, and assessing the implementation of the SNAP Online Purchasing Pilot. Because of this responsibility, we asked FNS officials about the agency's internal controls to ensure retailers adhere to pilot requirements, including those related to safeguarding SNAP participants' personal information. In response, FNS officials stated that the agency provides a template business requirements document to assist retailers in documenting how they will meet FNS' pilot requirements. FNS officials also stated that, as part of the application process, they require retailers to attest that they are responsible for ensuring that PII would not be compromised, sold, rented, or given to any third party without authorization. FNS officials explained that compliance will be assessed as part of the reauthorization of online retailers as part of normal monitoring and oversight. FNS officials further stated that participating retailers are required to provide a link to their website's security practices and policies. FNS noted their review of a retailer's website security practices and

¹² Four retailers were approved and actively participating in the pilot at the beginning of our fieldwork in July 2020. During our fieldwork, FNS started approving additional retailers, but we did not assess those approvals. The four retailers we reviewed accounted for more than 99 percent of all transactions in our scope.

¹³ OMB, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Circular A-123 (July 15, 2016).

¹⁴ USDA FNS, *SNAP Electronic Benefits Transfer Online Purchasing Pilot Request for Volunteers* (Sep. 15, 2016).

¹⁵ *Ibid.*

policies covers whether the retailer explains to the customer the precautions that the retailer has taken to secure customer data and the retailer’s liability should there be a breach that results in a loss to the customer.

To verify that retailers adhere to all online purchasing requirements before participating in the pilot, FNS officials stated that the agency conducts robust end-to-end testing. As part of FNS’ end-to-end testing, FNS officials stated that the agency reviews retailers’ policies on their websites during the vetting process to verify that either: (1) retailers provide assurances that they do not sell or share data with third parties, or (2) retailers who sell or provide data to third parties provide EBT customers an “opt out” option. However, FNS policy, as detailed in the RFV handbook, provides that the EBT customer must have an “opt in” option when providing third parties data and an “opt out” option for using data for internal marketing purposes.

Our assessment of FNS end-to-end user acceptance summary reports for the four retailers found that FNS personnel verified that the retailer’s system had met FNS’ functional requirements for the implementation of SNAP Online Purchasing Pilot. However, it did not include evidence that FNS’ personnel reviewed retailers’ privacy practices and policies to ensure compliance with the safeguarding of SNAP customers’ PII, such as if retailers provided “opt in” or “opt out” options to EBT customers when applicable. Further, FNS could not demonstrate that FNS personnel reviewed any of the four pilot retailers’ websites in the manner required.

When we reviewed the website links to retailers’ website policies that FNS provided, we found that none of the four retailers’ websites explain to the EBT customer the retailers’ liability in the event of a data breach—an FNS requirement.¹⁶ Additionally, one retailer’s website required the customer to establish an email and a password to access their security and privacy policies while another retailer’s website was not functioning properly and not allowing anyone to access. Because FNS did not adequately document its end-to-end testing, it is difficult to determine if FNS visited the site links, as the agency should have identified these issues.

We agree that end-to-end testing is a critical oversight control. To ensure this testing identifies any potential non-compliance with online transaction requirements to safeguard PII, FNS needs to establish better guidance and monitoring. By doing this, FNS can better ensure SNAP participants’ personal information is not compromised, sold, shared, or given to any third party without authorization.

Recommendation 3

Establish controls for monitoring, evaluating, and documenting SNAP Online Purchasing Pilot retailers’ requirements pertaining to the use of SNAP participants’ personal information.

Agency Response

¹⁶ We reviewed the website links for three of the four retailers on February 25, 2021, and the remaining retailer on March 15, 2021.

FNS concurs with this recommendation, and will establish internal operational guidance to include controls for monitoring, evaluating, and documenting pilot retailers' requirements pertaining to the use of SNAP participants' personal information.

OIG Position

We accept FNS's management decision on this recommendation.

Scope and Methodology

Our inspection scope covered FNS': (1) implementation of the SNAP Online Purchasing Pilot from February through June 2020; and (2) data related to participating households and online transactions from April 2019 through December 2020.

We conducted our fieldwork from July 2020 through March 2021. During our fieldwork, we experienced delays in the agency providing documents and access to staff that were necessary for our oversight of FNS COVID-19 SNAP Online Purchasing Pilot activities. In some instances, the agency took up to 61 days to deliver documentation to the Office of Inspector General (OIG). These delays were incurred as FNS officials followed review processes established for COVID-19 engagements. We ultimately received all requested information from FNS; but, these delays impacted our ability to timely conduct fieldwork.

To accomplish our inspection objectives, we:

- Examined relevant laws, regulations, policies, and procedures.
- Reviewed relevant documentation and responses related to FNS' implementation of the SNAP Online Purchasing Pilot.
- Interviewed FNS officials to discuss FNS' criteria for approving States and retailers, FNS' risk assessment, and FNS' controls used to ensure retailers meet online transaction program requirements.
- Reviewed FNS' website to obtain policies, guidance, and the number of participating retailers and States with regards to the SNAP Online Purchasing Pilot.
- Reviewed SNAP transaction data to identify the dollar amount of online transactions and number of households participating in the SNAP Online Purchasing Pilot.

We assessed the reliability of data by reviewing existing information and the systems that produced them and interviewing agency officials knowledgeable about the data. From these efforts, we believe the information we obtained is sufficiently reliable for this report.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. Those standards require that we obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our inspection objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our review.

Abbreviations

COVID-19.....	coronavirus disease 2019
EBT.....	electronic benefits transfer
FNS.....	Food and Nutrition Service
OIG.....	Office of Inspector General
OMB.....	Office of Management and Budget
PII.....	personally identifiable information
RFV.....	request for volunteers
SNAP.....	Supplemental Nutrition Assistance Program
USDA.....	United States Department of Agriculture

**Food and Nutrition Service
Response to Inspection Report**



Food and
Nutrition
Service

DATE: August 17, 2021

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INSPECTION

NUMBER: 27801-0003-22

TO: Gil H. Harden
Assistant Inspector General for Audit

FROM: Cindy Long /s/
Acting Administrator
Food and Nutrition Service

SUBJECT: COVID-19: Supplemental Nutrition Assistance Program Online
Purchasing in Response to Coronavirus Disease 2019

This letter responds to the official draft report for inspection number 27801-0003-22, COVID-19: Supplemental Nutrition Assistance Program (SNAP) Online Purchasing in Response to Coronavirus Disease 2019. Specifically, the Food and Nutrition Service (FNS) is responding to the three recommendations in the report.

FNS generally concurs with the recommendations and supports the Office of Inspector General's (OIG) objectives to assess the procedures, risks, and controls for the SNAP Online Purchasing Pilot. During the timeframe that OIG conducted this inspection, FNS successfully expanded a six-State and retailer pilot to 47 States and the District of Columbia, and hundreds of additional retailers. This resulted in providing SNAP online purchasing access to over 2 million households, which include seniors, the disabled, and those who are immunocompromised. Priority was necessarily placed on maximizing the ability of families to have safe and secure options for accessing food with their SNAP benefits during the unprecedented COVID-19 pandemic.

Although FNS did not have a formal process in place for documenting changes to the existing comprehensive risk assessment, the risks associated with online purchasing and the expansion of online purchasing were continually reviewed and considered as part of pilot operations, including during the pandemic expansion. The security and integrity of all aspects of SNAP benefit redemption remain a priority for the Agency.

In addition, FNS always strives to meet OIG timeframes for providing information, as we appreciate that delays can impact OIG's ability to complete their work on schedule. The FNS delays in providing OIG information for this inspection resulted from internal clearance processes that all USDA agencies were required to follow for COVID-19 engagements (as OIG noted in the report), as well as the unique nature of this engagement which occurred while FNS was in the midst of expanding the pilot as a part of the response to COVID-19.

OIG Recommendation 1:

Perform and update the SNAP Online Purchasing Pilot risk assessment to reflect how FNS will mitigate and test potential risks.

FNS Response:

FNS concurs with this recommendation and will review, update (if/as necessary), and formally document the results of the SNAP Online Purchasing Pilot risk assessment, including testing and risk mitigation.

Estimated Completion Date:

September 1, 2022

OIG Recommendation 2:

Establish a policy to periodically perform assessments to identify any new risks and re-evaluate existing ones related to the SNAP Online Purchasing Pilot.

FNS Response:

FNS concurs with this recommendation. FNS will establish internal operational guidance (policy) to undertake the process described in response to Recommendation 1 on a periodic basis, to identify new risks or changes to existing risks.

Estimated Completion Date:

September 1, 2022

OIG Recommendation 3:

Establish controls for monitoring, evaluating, and documenting SNAP Online Purchasing Pilot retailers' requirements pertaining to the use of SNAP participants' personal information.

FNS Response:

FNS concurs with this recommendation, and will establish internal operational guidance to include controls for monitoring, evaluating, and documenting pilot retailers' requirements pertaining to the use of SNAP participants' personal information.

Estimated Completion Date:

September 1, 2022



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