

Appendix C

Discussion Guide: Third-Party

Processor Key Informants

**Evaluation of Technology Modernization for SNAP Benefit
Redemption through Online Transactions**

Advance Email to Third-Party Processor Representative for Site Visit

Dear [CONTACT NAME],

As you may know, Abt, Altarum, and Novo Dia are working together to evaluate the Online Purchasing Pilot, which is authorized under the Agricultural Act of 2014¹ (The Farm Bill). Although this study is mandated and required by Congress, participation in this study is voluntary. Be assured that there will be no penalties if you decide not to respond, either to the information collection as a whole or to any particular question. The USDA Food and Nutrition Service is sponsoring this data collection. As part of the evaluation, our team is conducting interviews with key stakeholders involved in the pilot. The purpose of the interviews is to document the implementation of each retailer's online purchasing pilot, including key design and policy decisions related to the SNAP online purchasing experience; the process, challenges, and lessons of implementation; and the level of effort.

We would like to visit [NAME OF THIRD-PARTY PROCESSOR] during [TIME PERIOD] to conduct interviews with staff that have been involved in implementing the pilot.. At this time, we ask that you review the identify the appropriate staff to participate in the interviews. We are happy to schedule a brief phone call to provide more information about identifying staff to participate.

Please also let us know what dates you and your team will be available for us to conduct the visit.

Once the site visit dates have been selected, we'll be in touch with additional site visit logistics, including a list of interview topics to help you prepare for the visit. In the meantime, please let me know if you have any questions whatsoever. We're looking forward to our visit with you and your team!

Sincerely,

[NAME]

Public reporting burden for this collection of information is estimated to take two hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-xxxx*). Do not return the completed form to this address.

¹ Agricultural Act of 2014, Conference Report to Accompany H.R. 2642. P. 144-147.

**Evaluation of Technology Modernization for SNAP Benefit
Redemption through Online Transactions**

Advance Email to Third-Party Processor Representative for Telephone Interviews

Dear [CONTACT NAME],

As you may know, Abt, Altarum, and Novo Dia are working together to evaluate the Online Purchasing Pilot, which is authorized under the Agricultural Act of 2014² (The Farm Bill). Although this study is mandated and required by Congress, participation in this study is voluntary. Be assured that there will be no penalties if you decide not to respond, either to the information collection as a whole or to any particular question. The USDA Food and Nutrition Service is sponsoring this data collection. As part of the evaluation, our team is conducting interviews with key stakeholders involved in the pilot. The purpose of the interviews is to document the implementation of each retailer's online purchasing pilot, including key design and policy decisions related to the SNAP online purchasing experience; the process, challenges, and lessons of implementation; and the level of effort.

We would like to schedule phone interviews with [NAME OF THIRD-PARTY PROCESSOR] during [TIME PERIOD] to conduct interviews with staff that have been involved in implementing the pilot. At this time, we ask that you identify the appropriate staff to participate in the interviews. We are happy to schedule a brief phone call to provide more information about identifying staff to participate.

Once the interview times have been confirmed, we'll be in touch with additional logistics, including a list of interview topics to help you prepare. In the meantime, please let me know if you have any questions whatsoever. We're looking forward to our discussions with you and your team!

Sincerely,

[NAME]

Public reporting burden for this collection of information is estimated to take two hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-xxxx*). Do not return the completed form to this address.

² Agricultural Act of 2014, Conference Report to Accompany H.R. 2642. P. 144-147.

Evaluation of Technology Modernization for SNAP Benefit Redemption through Online Transactions

Draft Discussion Guide: Third-Party Processor Key Informants

Introduction

My name is [X], from [Abt/Altarum/Novo Dia Group]. As you may know, Abt, Altarum, and Novo Dia are working together to evaluate the Online Purchasing Pilot, which is authorized under the Agricultural Act of 2014³ (The Farm Bill). Although this study is mandated and required by Congress, participation in this study is voluntary. Be assured that there will be no penalties if you decide not to respond, either to the information collection as a whole or to any particular question. The USDA Food and Nutrition Service is sponsoring this data collection. My colleagues and I are collecting information from a wide range of stakeholders involved in the pilots in order to learn about the implementation process, the challenges you encountered, and lessons learned. I want to start by thanking you for taking the time to speak with us today. Your perspective and insights on these issues are very helpful.

I expect our conversation will take approximately two hours.

Before we begin, I would like to assure you that all of your responses will be kept private to the extent provided by law. You may decline to answer any question and may stop the interview at any time.

With your permission, we would like to record the conversation to ensure our notes accurately reflect your responses? Recording is voluntary and not required to participate in part or in whole with this data request. Do I have your permission to record our conversation?

Our report to FNS will not be publicly shared. Retailer representatives will have an opportunity to review the chapter describing their pilot and identify any information that is proprietary and should not be shared with others. It will describe the range of responses expressed by staff, and may list the names of organizations who contributed information, but we will not quote you or anyone by name or title. However, because of the relatively small number of organizations participating in the study, there is a possibility that a response could be correctly attributed to you.

Public reporting burden for this collection of information is estimated to take two hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center

³ Agricultural Act of 2014, Conference Report to Accompany H.R. 2642. P. 144-147.

Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-xxxx*). Do not return the completed form to this address.

First, do you have any questions for me about the SNAP Online Purchasing Evaluation or what we will be discussing today?

Background on Respondent

1. What is your position at First Data? What are your day-to-day responsibilities?
2. How long have you worked for First Data?
3. Describe your role implementing the online purchasing pilot.

Pilot Planning and Development

4. How was your organization involved in planning for the pilot and evaluation?

[Probe:]

- What kinds of staff were involved?
- What parts of the process did you work on (design, development, certification, testing)?

5. How did the acquisition of Acculynk™ affect the pilot?
6. Describe the steps involved in design, development, certification, testing for pilot purposes.
7. What changes to your systems were needed to implement the online purchasing pilot?
8. We would like to know how much staff time was involved in implementing the pilot (i.e., to design, develop, certify, and test the pilot).

[Interviewer will refer to Table 1 in the Appendix to guide the response to this question.]

[Probe:]

- How many people were involved in pilot implementation?
- Did you hire new staff specifically to manage the pilot or any aspect of pilot implementation? If so, what types of staff?

9. What were the primary challenges in integrating your system changes with the EBT host processors?

[Probe:]

- How did these challenges differ between Conduent and FIS?

10. What were the primary challenges in integrating your system changes with the various retailer (or third-party web service provider) systems? Please talk generally and then describe challenges specific to each retailer or third-party web service provider, if relevant.

[Probe:]

- Amazon
- Hy-Vee
- Safeway

- ShopRite
- Walmart
- Rosie (Dash's Market)
- Freshop (Hart's Local Grocer and Wright's Market). Were there any challenges related to accurately identifying which retailer (Hart's Local Grocer and Wright's Market) completed the transaction?⁴

[Probe:]

- Were there different challenges to integrating with retailers managing their own e-commerce websites versus retailers working with third-party web service providers?

11. Given the differences for an online EBT transaction, what alterations did First Data have to make to accommodate the pilot?

[Probe:]

- How difficult was it to make alterations?
- What changes to the incoming messages did you have to make? Did any of those changes require FNS approval?
- Did any changes after initial design, during implementation/testing, that required FNS approval?
- Did the changes require any modifications to existing validity checks?
- Are the retailers (or third-party web service providers) connecting via Rapid Connect or Bypass? If so, what changes, if any, were necessary?

Pilot Operations

12. What are the steps in processing SNAP online transactions?

[Probe:]

- How does the retailer website invoke the PaySecure PIN-pad? At what point in the ordering and payment process?
- Do the retailers use any other services that First Data provides (e.g., tokenization)?
- What other types of responses are needed, for example after PIN entry or token/encryption key calls?
- Did any retailer submit full card numbers?
- Were there many requests for transaction status? How do these compare to commercial transactions?
- How does First Data route the request for transaction authorization to the State EBT host processor and return the response to the retailer website?
- Have you observed a difference in transaction response time between online and in-store transactions?
- What exception or error processes occur during EBT transactions? How do these compare to exceptions or error processes that arise during non-EBT transactions?

13. Were any specific transaction types problematic when an EBT card with PIN was used?

⁴ If there are any changes or additions to the web service providers listed here, they will be updated accordingly prior to conducting interviews.

[Probe:]

- returns
- balance inquires
- purchases
- reversals
- adjustments/"chargebacks"

[For each transaction type that is identified as problematic, ask]: How does this compare to when a commercial debit card is used?

14. Can you quantify or elaborate on any difference in integrating with larger, more established online eCommerce merchants (i.e., Walmart, Amazon) compared to chains such as Wakefern and Safeway/Albertson's or third-party web service providers (i.e., Rosie or Freshop) for smaller stores?
15. What technical issues relating to security, data transport and storage, or institutional policy did you encounter?
16. Was the transaction approval rate for online SNAP EBT customers the same, higher, or lower than for existing debit card users?

Security/Integrity

17. What concerns do you have about transaction security?
18. Have you identified or flagged any fraudulent transactions during the pilot?

[Probe:]

- For what reasons were transactions flagged?
 - What was the outcome of flagged transactions?
 - How were the fraudulent transactions completed?
 - What adjustments were made as a result of the fraudulent transactions you identified?
 - What would help prevent these issues in future transactions?
19. With the introduction of SNAP online shopping, there could be new opportunities for fraud. Does First Data do any real time monitoring for fraud detection for non-EBT online purchases? If so, is the same monitoring approach used for EBT online transactions? Please describe.
 20. How do you ensure the privacy and security of information provided by online EBT shoppers? How is this different from how you ensure the privacy and security of information provided by other shoppers (non-EBT shoppers)?
 21. Has a particular retailer or third-party web service provider had a disproportionate amount of: 1) rejected or reversed transactions; 2) transactions that were outside the normal time and values as compared to other merchants; or 3) errors due to incorrectly formatted or encryption (rekey) errors?
 22. Given that standard data elements like CVV, address validation, and card expiration are not used in EBT, what best practices, if any, have the retailers (or their third-party web service providers), First Data, and/or EBT processors added to monitor for unusual online activity?

[Probe:]

- What do you see as the main risks and system vulnerabilities of online EBT use?
- How can they be mitigated?
- What additional monitoring activities or front-end verification processes would you recommend in order to avoid validation issues that have arisen during the pilot?

Successes, Challenges, and Solutions

23. Thus far, what have been the greatest successes of the pilot?

[Probe:]

- What factors contributed significantly to these successes?
- What, if anything, could be done differently to improve the operations of the pilot (e.g., security; coordination between First Data, EBT host processors, retailers, and third-party vendors operating retailer websites)?

24. What have been the biggest challenges of the pilot?

[Probe:]

- Have these challenges been resolved?
- If so, how? If not, why?
- What could other pilot stakeholders (e.g., FNS, EBT host processors, State SNAP agency, retailers) have done differently to meet their goals more effectively?
- What could your organization have done differently to meet your goals more effectively?

25. Do you have any additional suggestions for pilot improvement?

26. Thinking ahead, do you have any thoughts or advice about expanding SNAP online purchasing beyond the current pilot sites and pilot retailers?

[Probe:]

- What would be involved to expand to additional online retailers in participating States (e.g., additional development needed to expand to additional retailers in States with existing pilots)?
 - o Are there particular types of online retailers not included in the pilot that could be problematic if included in the expansion? What retailer characteristics should FNS consider if online shopping is expanded?
- What would be involved to expand SNAP online purchasing to another State? (e.g., is additional development needed to expand to another State?) What would be the level of effort for your organization?
- What would be involved to expand SNAP online purchasing nationwide? (e.g., is additional development needed for nationwide implementation?) What would be the level of effort for your organization?

[Interviewer will refer to Table 2 in the Appendix to guide the response to this question.]

Appendix

These tables will be sent to respondents via email in advance of the interview. During the interview, the evaluation team will review and clarify the responses.

Dear [Contact Name],

In preparation for our [visit/telephone conversation] on [date], please complete the below. Please try to respond as completely and accurately as possible. Where exact figures are not available, an informed estimate is fine.

These tables will help us understand the amount of time involved in planning and implementing the Online Purchasing Pilot, as well as the level of effort it would take to expand the pilot beyond the current locations.

Please return these tables to me no later than [date]. We will discuss these forms during our [visit/telephone conversation].

If you have any questions, please contact me at [email] or [phone].

Sincerely,

[NAME]

Table 1

Please describe the staff (technical and non-technical) involved in each phase of the pilot, their estimated level of effort (in hours), and the associated cost. If you cannot provide an estimate of hours, how much total time did it take to plan and design the pilot?

Phase	Estimated Level of Effort				Did this take more time than initially budgeted? (yes/no)	Estimated Cost (Dollars)	
	Technical Staff		Non-Technical Staff			Technical Staff	Non-Technical/ Administrative Staff
	Number of Staff	Hours	Number of Staff	Hours			
Pilot Design							
Pilot Development							
Pilot Certification							
Pilot Testing							
Support for Ongoing Operations							

Table 2

Please describe the staff (technical and non-technical) that would be involved in expanding SNAP online purchasing, the time it would take (in hours), and the associated cost. If you cannot provide an estimate of hours, how much total time would it take?

Phase	Estimated Level of Effort				Estimated Cost (Dollars)	
	Technical Staff		Non-Technical Staff		Technical Staff	Non-Technical/ Administrative Staff
	Number of Staff	Hours	Number of Staff	Hours		
Design						
Development						
Certification						
Testing						
Support for Ongoing Operations						

Public reporting burden for this collection of information is estimated to take two hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-xxxx*). Do not return the completed form to this address.