

Supplemental Nutrition Assistance Program (SNAP)

# Disaster SNAP Guidance

Policy Guidance, Lessons Learned, and Toolkits to Operate a  
Successful D-SNAP

United States Department of Agriculture Food and Nutrition Service  
[July 2014](#)

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# Policy Guidance

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## Introduction

Welcome to the revised guidance handbook for the Disaster Supplemental Nutrition Assistance Program (D-SNAP). This handbook describes D-SNAP policy, provides lessons learned from previous D-SNAPs, and contains toolkits to help SNAP offices plan for, organize, and operate a D-SNAP.

### *What is D-SNAP?*

D-SNAP provides temporary food assistance for households affected by a natural disaster. A D-SNAP provides one month of benefits to eligible disaster survivors and can facilitate the issuance of supplemental SNAP benefits for ongoing households. To be eligible for D-SNAP, a household must live in the identified disaster area, have been affected by the disaster, and meet certain D-SNAP eligibility criteria.

### *Why operate a D-SNAP?*

D-SNAP is designed for situations where a large number of households have disaster-related expenses not considered by the regular program and where the need is so great that the vastly streamlined D-SNAP certification process is warranted.

### *Where does it happen?*

An affected area must have received a Presidential declaration of “Major Disaster” with Individual Assistance in order to request a D-SNAP.

### *When does it happen?*

D-SNAP timing varies with the unique circumstances of each disaster, but always begins after commercial channels of food distribution have been restored and families are able to purchase and prepare food at home. Before operating a D-SNAP, a State will ensure that proper public information, staffing and resources are in place.

### *Who does what?*

The State has the primary role for planning, requesting, and operating a D-SNAP. The Food and Nutrition Service (FNS) approves a State’s request to operate a D-SNAP and supports the State’s D-SNAP efforts through policy guidance, training, and technical assistance.

This D-SNAP guidance handbook will provide State agencies with the tools they need to operate a successful D-SNAP that is consistent with the Stafford Act and established D-SNAP policy. FNS recognizes that disaster situations and State agencies’ responses

to them vary widely. The guidance is not designed to provide an exhaustive list of problems that will arise or prescriptive solutions to those problems. Rather, it is intended to help State agencies design a disaster plan and disaster response that addresses their unique geographic, economic, political and demographic circumstances, the nature of the disaster, and the scope of the damage.

## Part 1. Policy Context

The first part of this section provides a context for D-SNAP, including:

- Distinction between regular SNAP and D-SNAP
- D-SNAP authority
- Broader government disaster response

This part also outlines the roles of the Department of Agriculture (USDA), FNS, and States and provides resources for broader disaster assistance information.

### 1.1. D-SNAP vs. SNAP

D-SNAP is an entirely different program from the regular Supplemental Nutrition Assistance Program (SNAP). The chart below compares the programs.

Figure 1. Comparison of Eligibility Standards for SNAP and D-SNAP

| Eligibility Element               | SNAP  | D-SNAP   |
|-----------------------------------|---|--|
| Disaster Status                   | N/A   | Experienced an adverse effect as a result of disaster  |
| Identity of applicant             | Verified  | Verified   |
| Residency                         | Residence in State or Project area is verified          | Living in disaster area at the time of the disaster, State option to include those working in disaster area. Verified where possible |
| Household Composition             | Individuals who purchase and prepare meals together     | Persons living and eating together at the time of a disaster   |
| Benefit amount                    | Varies depending on circumstances                       | Maximum allotment for household size   |
| Restricted Eligibility Categories | Student, IPV, citizenship status, and work registration | Student, IPV, citizenship status, and work registration not applicable   |
| Categories                        | restrictions apply                                      |  |

|                                       |  |   |
|---------------------------------------|--|---|
| <b>Resources</b>                      | Counted separately   | No separate resource test. Accessible liquid resources and income added together to find Disaster Gross Income.   |
| <b>Income</b>                         | Must meet gross income test to qualify                             | Only net (take-home) income during the benefit period counted. Add to resources to find disaster gross income.  |
| <b>Deductions &amp; Expenses</b>      | Deductions calculated for eligible households.                     | Maximum standard and shelter deductions already incorporated into disaster eligibility standards. Use of net income eliminates need to calculate earned income deduction. |
|                                       |  | Unreimbursed, out of pocket, disaster-related expenses not expected to be reimbursed during the 30-day disaster benefit period are allowed as deductions.                 |
| <b>Intentional Program Violations</b> | Penalties are 12 months, 24 months, and permanent disqualification | SNAP IPV not applicable in D-SNAP. D-SNAP IPV counts toward disqualification in SNAP.   |

More information on D-SNAP eligibility is detailed in subsequent sections, most notably [Eligibility](#).

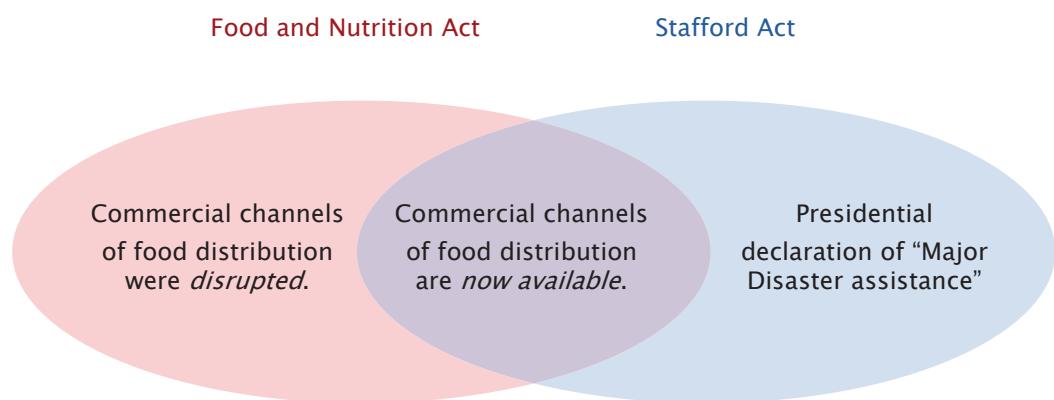
## 1.2. Authority

The Robert T. Stafford Disaster Relief and Emergency Assistance Act provides the Secretary of Agriculture with the authority to operate a D-SNAP when affected areas have received a Presidential major disaster declaration and when commercial channels of food distribution are available. The Food and Nutrition Act of 2008 provides the Secretary of Agriculture with the authority to establish temporary emergency standards of eligibility for households who are survivors of a disaster that disrupts commercial channels of food distribution after those channels have been restored.

FNS has elected to approve the operation of D-SNAP under Stafford Act authority when affected areas have received a Presidential disaster declaration for individual assistance. Receipt of an individual assistance declaration is indicative of the need for assistance at the household level in the affected area. Using this measure helps FNS

and our State partners target D-SNAP resources to the hardest hit areas likely to require intensive food assistance. Aligning D-SNAP with the President's declarations of individual assistance ensures that FNS is able to provide aid to affected households in a consistent manner.

Figure 2. Determining Factors Required by D-SNAP Authorities



### 1.3. Context of D-SNAP in Government Disaster Response

D-SNAP is one important part of a broader government response in the aftermath of a disaster. Effective collaboration and communication among various government agencies is essential to serve those in need in the aftermath of a disaster.

#### State Role

The primary responsibility for providing emergency food assistance rests with the State agency. State agencies must design their own D-SNAP Plans and update them annually. After a disaster strikes, they must evaluate the need for a D-SNAP or another feeding program and, if desired, submit to FNS a detailed request to operate a D-SNAP. Once a D-SNAP has been approved, the State agency is responsible for effectively implementing the program, ensuring program integrity, complying with Civil Rights laws, and submitting daily reports. Once program operations close, the State must perform post-disaster reviews and report their findings to FNS.

#### FNS Role

FNS provides disaster nutrition assistance in three ways:

- Provides USDA Foods for shelters and other mass feeding sites;

- Provides USDA Foods for distribution directly to households in need in certain limited circumstances,
- Approves D-SNAP operations and provides funding for 100% of disaster benefits and 50% of State administrative costs

The approval of a D-SNAP plan is not a legal determination by FNS of compliance with Federal Civil Rights laws.

FNS supports the State's efforts to provide D-SNAP benefits by providing policy guidance, training, and technical assistance to State agencies as they plan, implement, and assess their D-SNAP activities. FNS provides approval for State D-SNAP Plans and State applications to operate the D-SNAP and uses the information provided in post-disaster reviews and assessments to improve D-SNAP policy, training, and technical assistance.

### USDA Role

The Federal government's National Response Framework designates various Emergency Support Functions (ESFs) to coordinate and leverage Federal resources to assist State and local disaster response and recovery efforts. USDA is the lead agency for ESF-11, Agriculture and Natural Resources, which includes disaster nutrition assistance. Different ESFs may be activated depending on the type and severity of a disaster. FNS staff participates at the National and Regional level when ESF-11 is activated. For more information about coordinated Federal disaster response, see the Toolkit for Regional Offices or contact your Regional Disaster Coordinator.

#### Getting Help

To get assistance from any other Federal agency, or any other agency within USDA, contact your [Regional Disaster Coordinator](#).

### 1.4. Funding Issues

FNS provides reimbursement of 50 percent of State administrative costs to operate a D-SNAP, and funds 100 percent of benefits issued. States may not use any Federal funds received from FEMA to obtain FNS matching funds. As FNS cannot provide reimbursement for State expenditures made with funds that are Federal in origin, States may not use any Federal funds received from FEMA to obtain FNS matching funds.

### What Will FEMA Provide?

FEMA does not provide funds for the sole purpose of operating a D-SNAP. FEMA will pay for extra expenses incurred by FNS in performance of its ESF-11 mission assignment. FEMA may also contribute funds for staff assigned to perform functions associated with both an ESF-11 mission assignment and the D-SNAP (e.g., staff gathering information at D-SNAP sites for use in FEMA-required reports).

If a D-SNAP application site is at a location jointly staffed by FEMA, FEMA may provide directly for the cost of leasing the facility, human comfort items for those waiting in lines (e.g., portable toilets, tents), and other shared resources. The decision to co-locate Disaster Recovery Centers (DRC) and D-SNAP sites should be coordinated early with FEMA, FNS and the State agency so that needs are identified and agreements made as to whether and to what extent FEMA will provide funding or other resources.

## Part 2. Policy Basics

As highlighted in the introduction, D-SNAP provides one month of benefits to eligible disaster survivors and can facilitate the issuance of supplemental SNAP benefits for ongoing households. To be eligible for D-SNAP, a household must live in the identified disaster area, have been affected by the disaster, and meet certain D-SNAP eligibility criteria.

This part describes the basics of D-SNAP policy, including:

- Key concepts
- Eligibility
- Verification
- Issuance

This section serves as a resource for common D-SNAP terms and definitions and how they relate to D-SNAP benefits, eligibility, and issuance.

### 2.1. Key Concepts

#### Allotment

D-SNAP provides a full month's allotment to households who may not normally qualify for or participate in SNAP. The allotment for a household is equal to the maximum monthly allotment for the household size provided under regular SNAP. D-SNAP allotments are updated yearly and available on the FNS website.

As part of a D-SNAP, States should supplement the regular SNAP benefits of ongoing households affected by the disaster to bring them up to the maximum allotment. For more information, see [Supplements](#).

#### Household Composition

Household composition is established as of the date the disaster struck. A household includes those people living together, purchasing and preparing food together at the time of a disaster. D-SNAP household does not include those people with whom applicants are temporarily staying due to the disaster.

*Example: Susan and her two children were affected by a tornado that struck their town. All three of them are temporarily residing with Susan's aunt until it is safe to return home. When Susan applies for D-SNAP, she requests benefits only for herself and her*

*children, as the three of them lived together and purchased and prepared meals together before the disaster struck.*

### Application Period

The State agency may accept applications for D-SNAP benefits from new households and requests for supplements from ongoing households only during the application period. If the State is accepting requests for affidavits from ongoing households over the phone and mailing the forms to the household, the request must be received during the application period. Each State agency can determine an appropriate amount of time, such as ten days, to allow for the return of the affidavit for supplements.

FNS generally approves application periods of 7 days, though States retain the option to operate for fewer days as they deem appropriate to the circumstances. The State should inform FNS, as part of the D-SNAP request, whether applications will be accepted on Saturday or Sunday.

The State should not begin accepting applications until public information and outreach have begun, trained staff and resources are in place, and State systems are ready to begin D-SNAP processing and issuance. More information about D-SNAP timing can be found in [D-SNAP Timing](#).

State agencies that need to change the application period dates from those in their approved D-SNAP request must seek FNS permission to do so. In limited circumstances, if demand for D-SNAP benefits among the general community or specific groups/areas remains significant, FNS may consider State requests to extend the application period beyond 7 days. States requesting an extension should consider the ongoing need of affected households as well as resource availability and program integrity concerns. For more information on extensions, see [Changes to the D-SNAP](#).

### Benefit Period

The benefit period is critical to determining household eligibility: it is the period during which disaster-related expenses may be counted and the start date used to determine household composition and resources. Only income, resources, and expenses during the benefit period are considered in determining D-SNAP eligibility. The benefit period approved by FNS for each D-SNAP is 30 days, except in extraordinary circumstances.

### Benefit Period Start Date

The date the disaster struck (known as the Incident Period) is included in every Presidential Disaster Declaration for Individual Assistance and is available on [FEMA's website](#).

The benefit period begins on the date of the disaster or the date of any mandatory evacuation preceding the disaster. This date is generally the first day of the “Incident Period” provided by the Presidential Disaster Declaration. In some instances, State agencies may feel it is appropriate to select a date later than the first day because of when the storm struck a particular area. States considering this option should discuss the appropriate start date to the benefit period with each locality prior to the submission of the initial D-SNAP request.

*Example: The Presidential Disaster Declaration for Individual Assistance lists the incident period for a hurricane in six South Carolina counties as June 13 – 15. The State confers with each county and determines that the hurricane struck the State on the 13<sup>th</sup> and that is the appropriate start date for the benefit period. In this instance, the benefit period would be June 13 – July 12.*

*Example: The Presidential Disaster Declaration for Individual Assistance lists the incident period for tornadoes and flooding in 2 Illinois counties as August 26 – 30. The State confers with the counties and determines that County A was struck by the tornadoes on August 26<sup>th</sup>, while County B was mostly affected by subsequent flooding beginning on the 29<sup>th</sup>. The State opts to utilize separate benefit periods in each county in order to adequately capture disaster expenses for all households. In this instance, the benefit period would be August 26 – September 24 for County A and August 29 – September 27 for County B.*

## 2.2. Eligibility

To be eligible for D-SNAP, an applicant household must first meet basic criteria, including:

- Residing in the disaster area
- Purchasing or planning to purchase food during the benefit period
- Experiencing an adverse effect due to the disaster. Households meeting the basic criteria will then be measured against the D-SNAP income limits in order to determine eligibility.

### Residency

In most cases, the household must have lived in the disaster area at the time of the disaster. States may also choose to extend eligibility to those who worked in the disaster area at the time of the disaster. When submitting their D-SNAP requests

States should specify if they will serve households that a) lived in the disaster area or b) lived or worked in the disaster area.

*Example: Michael lives in County X and works in neighboring County Y. His place of employment was damaged in the disaster, so he was unable to work and experienced a loss of income as a result. The State agency has opted to serve those who lived or worked in the disaster area, so Michael can apply for D-SNAP, based on his employment in County Y and his lost income due to the disaster.*

### Purchase Food

The household must plan on purchasing food during the disaster benefit period or have purchased food during that time if the benefit period has passed. This would likely apply to the majority of households, except after very large disasters where households may remain in shelters and be served through congregate feeding throughout the benefit period.

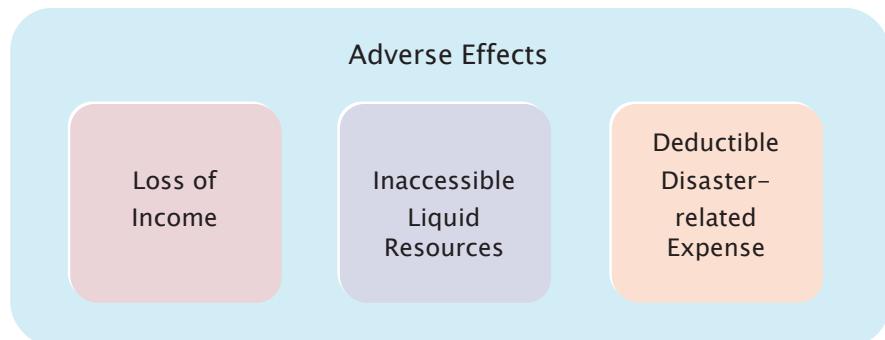
### Residency Requirement

As in the regular program, States can only serve their own residents through D-SNAP. In large disasters where families may have temporarily relocated to other States, FNS may grant approval for various options under the D-SNAP Evacuee Policy developed in the wake of Hurricane Katrina.

### Adverse Effects

Disaster-related adverse effects fall into three categories: loss of income, inaccessible resources, and disaster expenses. The household must have experienced at least one of the following adverse effects in order to be eligible.

Figure 3. Types of Disaster-Related Adverse Effects



⌘ **Lost or Inaccessible Income.** Lost or inaccessible income includes reduction or termination of income, or a delay in receipt of income during the benefit period due to the disaster.

⌘ **Inaccessible Liquid Resources.** Inaccessible liquid resources (e.g., banks are closed due to the disaster) during the benefit period. Note that this is an infrequent occurrence, as household can usually access their resources via online banking or ATMs even if bank branches are closed in the affected area.

⌘ **Deductible Disaster-related Expenses.** Out of pocket disaster-related expenses paid (not only incurred) by the household that are not expected to be reimbursed during the 30-day benefit period. This can include damage to or destruction of the household's home or self-employment business. Types of eligible expenses are described in more detail in [Adverse Effects](#).

### Eligibility and Participation in Other FNS Programs

A household is not eligible for D-SNAP if it is already being served by the disaster household distribution of USDA Foods, which is separately authorized under disaster regulations. This disaster household distribution program is distinct from the normally operating Food Distribution on Indian Reservations (FDPIR) and The Emergency Food Assistance Program (TEFAP) as described below.

#### ⌘ **Food Distribution on Indian Reservations (FDPIR)**

If a household received regular FDPIR benefits after the disaster occurred, it would not be entitled to receive D-SNAP in the same month. FDPIR benefits received by a household prior to the date the disaster struck should not be considered in determining a household's eligibility for D-SNAP, since any benefits on hand at the time of the disaster were likely destroyed.

#### ⌘ **The Emergency Food Assistance Program (TEFAP)**

Households may participate in both TEFAP and the D-SNAP or SNAP in the same month. However, if the TEFAP site offers an FNS approved disaster household distribution of USDA Foods, a household may not simultaneously receive D-SNAP benefits and a disaster household food package.

### Disaster Gross Income Limit

Unlike regular SNAP, which includes separate tests for income and resources, D-SNAP groups income and resources together under one test.

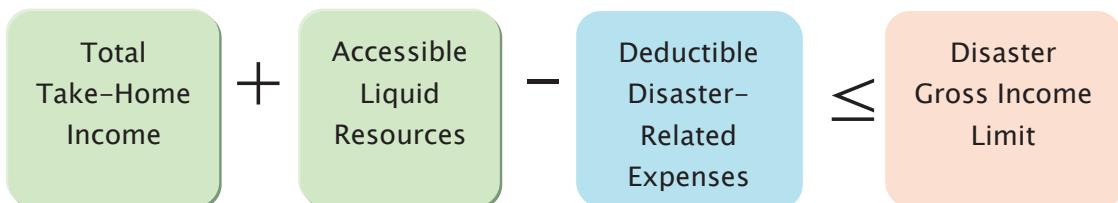
The household's take-home income received (or expected to be received) during the benefit period plus its accessible liquid resources minus disaster-related expenses (unreimbursed disaster related expenses paid or anticipated to be paid out of pocket during the disaster benefit period) shall not exceed the Disaster Gross Income Limit (DGIL). In calculating a household's Disaster Gross Income, care must be taken to avoid the double counting of income and resources. Resources are determined on the first day of the benefit period; anything received during the remainder of the benefit period would be counted as income.

#### D-SNAP Allotments and Eligibility Standards

For the latest D-SNAP allotments and eligibility standards, go to:

[http://www.fns.usda.gov/disasters/response/D-SNAP\\_Handbook/guide.htm](http://www.fns.usda.gov/disasters/response/D-SNAP_Handbook/guide.htm).

Figure 4. D-SNAP Income and Resource Test



FNS calculates each year's DGIL by adding together the maximum monthly net income limit, the maximum standard income deduction amount, and the maximum capped shelter expense deduction.

#### Disaster Gross Income Key Terms

The following are the definitions of terms related to the calculation of a household's disaster gross income. For more relevant terms, please refer to previous descriptions in [Key Concepts](#) and [Eligibility](#).

- **Income.** The total take-home pay of household members. This includes:
  - Wages a household actually receives after all payroll withholding (payroll withholding includes any automatic deductions from gross pay, such as taxes, insurance premiums, contributions to 401(k) or other inaccessible accounts, automatic payments to creditors, etc...)
  - Public assistance payments or other unearned income
  - Net self-employment income.

*Example: Laura Smith lives with her mother, Joan, and her three children. They are not currently participating in SNAP. Their household was impacted by the disaster and they apply for D-SNAP. Joan is employed and receives monthly take-home pay of \$1200, after payroll taxes and her health insurance premium are taken out. Laura receives \$850 in TANF benefits each month along with \$325 in SSI for her youngest child, who is disabled. The family's total income for D-SNAP purposes is \$1200 + \$850 + \$325 = \$2375.*

- **Accessible Liquid Resources.** Accessible liquid resources include cash on hand, and funds in accessible checking and saving accounts on the first day of the benefit period. It does NOT include:
  - Retirement accounts,
  - Disaster insurance payments,
  - Disaster assistance received or expected to be received during the benefit period,
  - Payments from Federal, state or county/local government agencies or disaster assistance organizations (including disaster-related Unemployment Compensation).

#### Disaster Assistance Payments

As mentioned in this part, disaster assistance payments are not considered accessible liquid resources. However, the State must consider payments, such as those from FEMA or home owners' insurance, when determining deductible disaster related-expenses. Deductible disaster-related expenses include only those expenses paid out of pocket and not reimbursed during the disaster period. For a disaster-related expense that is reimbursed, only the net expense is deductible.

*Example: On the day the disaster struck, Laura had \$50 in cash, and \$250 in her checking account. Her mother, Joan, had an additional \$300 in her savings account. They are able to access the funds in their accounts. They have applied for FEMA assistance for the property damage they incurred, but do not anticipate receiving the payment before the benefit period ends. Their household's total accessible liquid resources are \$50 + \$250 + \$300 = \$600.*

- **Inaccessible Liquid Resources or Income.** Includes otherwise liquid resources that are inaccessible (for instance, because a bank is closed due to the disaster) for a substantial portion of the benefit period. Note that this is an infrequent occurrence, as household can usually access their resources via online banking or ATMs even if bank branches are closed in the affected area. Also includes receipt

of income which has been delayed for a substantial portion of the benefit period due to the disaster.

*Example: Laura & Joan's local bank is closed, but they are able to withdraw money from the ATM. Laura is also able to access the paycheck and assistance payments that are deposited directly into her accounts.*

*However, the doctor's office where Joan works is located in a part of town affected by the disaster, and her boss has informed her that the office will be closed for two weeks. She is an hourly employee and will not earn wages during the time the office is closed. The earnings she would normally receive during those two weeks would be considered inaccessible and not counted in determining the family's Disaster Gross Income. Since Joan anticipates returning to work and being paid during the second half of the benefit period, her anticipated earnings for that time would be counted as income.*

- **Deductible Disaster-Related Expenses.**

Includes expenses that the household has paid or expects to pay out-of-pocket during the disaster benefit

period. Note that, if the household has received or anticipates receiving a reimbursement for these expenses during the disaster period, only the net expense is deductible. In addition, expenses which are incurred but not paid during the benefit period, such as those paid by credit card if the bill is due after the benefit period ends, are not considered out-of-pocket and are not deductible. For a list of examples of disaster-related expenses, please refer to [Adverse Effects](#).

#### Key D-SNAP Eligibility Questions

- Did the household live (or work) in the disaster area when the disaster struck?
- Does the household plan to purchase food?
- Did the household receive FDPIR or household disaster distribution of USDA Foods after the disaster struck?
- Did the household experience a disaster-related loss of income or a disaster related expense that will not be reimbursed during the benefit period?
- Does the household meet the disaster income and resource test?

Eligible expenses may include the following, plus any reasonable disaster-related expenses as determined by the State agency:

- Home or business repairs
- Temporary shelter expenses
- Evacuation expenses

- Home/business property protection
- Medical expenses due to personal injury
- Disaster-related funeral expenses
- Disaster-related pet boarding fees
- Expenses related to replacing necessary personal and household items, such as clothing, appliances, tools, and educational materials
- Fuel for primary heating source
- Clean-up items expense
- Disaster-damaged vehicle expenses
- Storage expenses

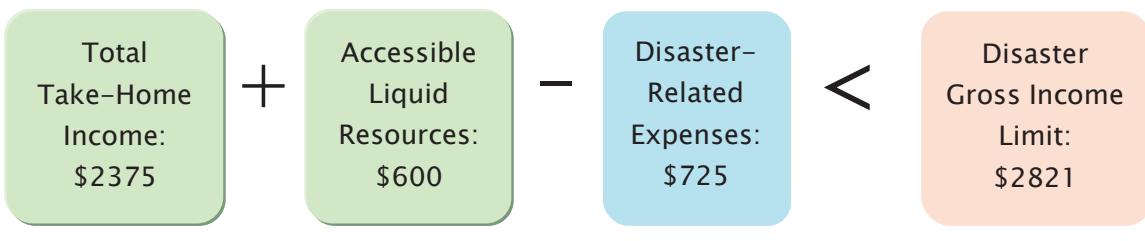
Food lost or spoiled due to the disaster or extended power outage may also be considered a disaster expense. Including “food loss alone” as a criterion for eligibility is optional and, if applicable, is included in the D-SNAP approval from FNS. (For more information on use of food loss alone as an eligibility criterion, see [Food Loss](#)).

#### Incurred vs. Paid

Only expenses actually paid during the benefit period are deductible. To determine if an expense was paid for out of pocket or merely incurred, the worker must ask the household how they paid for the expense. Expenses paid by credit card are not deductible unless the bill is also paid during the benefit period.

*Example: Joan's car was damaged in the disaster and the total cost of the repair is \$700. Joan's insurance covers \$500 and she will pay \$200 out of pocket to have it repaired so she can continue to go to work. The full cost is not counted for D-SNAP purposes; only the \$200 Joan paid is considered a deductible expense. Laura and Joan's home was also damaged and repairs will cost \$3000 in total; they've paid \$400 out of pocket so far. They have not yet received FEMA assistance or reimbursement from their home owners insurance and do not anticipate receiving those payments until after the benefit period ends. They also lost \$125 worth of food due to the extended power outage following the disaster. In total, their deductible disaster-related expenses are: \$200 + \$400 + \$125 = \$725.*

Figure 5: Calculating the Smith Family's D-SNAP Eligibility



### Disaster Guideline Income Limits including Disaster Expenses

With FNS approval, a State can choose to incorporate into their disaster income limits a standard disaster expense component. Determining a household's deductible disaster-related expenses can be difficult and time-consuming, particularly with high applicant volume. Some States have found that incorporating a standard disaster expense deduction into the income limits can simplify eligibility determination. States considering this option should carefully consider if its use is appropriate to the type and severity of the disaster. Those interested in using these specialized income limits should contact FNS for technical assistance and approval. See [Disaster Standard Expense Deduction](#) for more information.

#### Virginia Disaster Standard Expense Deduction (DSED)

In 2005, the Virginia State agency requested help from FNS in developing disaster income limits that incorporated a standard for disaster expenses. FNS provided technical assistance to develop guidelines based on typical disaster expenses in past Virginia disasters. Virginia's Disaster Standard Expense Deduction has subsequently been used by other States to simplify D-SNAP application processing.

### 2.3. Verification Basics

Verification rules are eased during a disaster to reduce administrative burdens and to reflect the reality that households and eligibility workers may not have access to usual verification sources. Verification requirements in D-SNAP are three-tiered: 1) Identity must be verified; 2) residency and loss/inaccessibility of income or liquid resources should be verified where possible; and 3) household composition and food loss can be verified if questionable.

Each disaster is unique and the availability of verification will likely vary depending on the circumstances. For example, in a disaster where strong winds caused extended power outages, households would likely be able to provide proof of residency and household composition, while households that lost their homes due to tornadoes or hurricanes likely will not be able to provide these documents. When planning for D-SNAP operations, preparing public information, and conducting staff training, States should consider the types of verification (such as power outage maps, data matches, etc...) that may be available to the agency, and to the household for a given incident.

For more details on verification, including suggested ways to verify each item, please refer to [Verification](#).

## 2.4. Issuance

Each State must be prepared to issue D-SNAP benefits through its Electronic Benefits Transfer (EBT) system during an emergency while successfully interacting with that State's eligibility system and their EBT contractor's system. EBT issuance is a required component of State Disaster Plans.

A State's D-SNAP issuance plan should incorporate procedures for:

- Ensuring that benefits are made available as soon as possible and no later than 3 calendar days (except in questionable cases in which issuance may be delayed up to 7 days) from the date the application was filed.
- Accessing sufficient card stock to operate a D-SNAP.
- Minimizing the number of times recipients return to a disaster assistance location for benefit application and issuance. Ideally, this would require only one visit.
- Providing easy integration and reconciliation with the State's eligibility system and the EBT processor's database, as well as access to information on a State's disaster EBT system via on-line data and off-line reports.
- Checking for duplicate participation of all household members.

## Part 3. Planning

Although it is impossible to be completely prepared for disasters, State agencies and FNS Regional Offices thorough planning will mitigate the challenges of preparing to operate a D-SNAP once the disaster has struck. This part outlines some pre-planning activities that the Regional Office and State agency should perform to increase disaster preparedness.

This part covers the following areas:

- Regional Planning
- State Planning
- State Preparation Highlights

Taking these steps will help establish communication and planning between State and Regional Offices (ROs), ensure that staff is trained and up to date on policy and processes, and provide a foundation for States and FNS to respond quickly and appropriately to the particular needs of a disaster.

### 3.1. Regional Planning

Every year, each FNS Regional Office (RO) should review its internal D-SNAP plan, revise the plan and train staff as needed. The RO should also engage in annual contact with its respective States to discuss disaster planning.

#### Regional Plan

The Regional Disaster plan is an internal guide that ensures timely, high-quality assistance to States with preparing for disaster operations, including D-SNAP planning, implementation, and assessment.

#### Contents

The Regional disaster plan can take any form, but should include:

- Standard Operating Procedures for D-SNAP and other disaster programs
- Administrative and Communication plan:
  - Names and responsibilities of all lead personnel
  - Detailed description of the role of the field offices
  - Outline of delegated authority
  - Established lines of communication
  - Names and off-hours phone numbers of relevant staff

- Regional fraud control plan
- Training plan for State and Regional staff

## State Training

ROs should take advantage of existing meetings, conferences, and site visits to engage in D-SNAP training with the State agencies within its region.

### ✳ Objectives

The objectives of these trainings are to:

- Clarify roles of State agency and Regional Office
- Establish clear lines of communication
- Help States develop and update their disaster plans
- Allow States to share experience and knowledge

Possible contact and training opportunities include:

- Face-to-face meeting with State agency
- Review of D-SNAP readiness during Regional reviews, including Program Access Reviews and Management Evaluations
- Participation in State agency-led disaster exercise with follow-up discussion
- RO presentation about disaster preparedness at other State meetings
- Region-led disaster webinar or teleconference

## 3.2. State Planning

SNAP regulations require State agencies to maintain current disaster plans. Each State agency must review its existing D-SNAP plan on an annual basis, revise if necessary, and submit a copy to the RO by August 15 of each year. Alternative plan submission dates may be negotiated with the ROs on a case by case basis as appropriate.

Each State D-SNAP plan must include:

1. Roles and Responsibilities
2. Resource Readiness Plan
3. Implementation Plan

These three components must address the following elements:

### Roles and Responsibilities.

- **Agencies and Responsibilities.** Identity of county/local, State and Federal government agencies with responsibilities for disaster assistance, including a description of responsibilities for each agency. See [Context of D-SNAP in Government Disaster Response](#).
- **Points of Contact.** Provide names, positions, and phone numbers of county/local, State and Federal government officials and their back-ups who are key contact persons during a disaster (including the State agency disaster coordinator).
- **Community Partners and Roles.** Identify private disaster relief agencies within the State such as the Red Cross, Salvation Army, or community groups and a description of their role in D-SNAP implementation. See [Volunteers](#).

### Readiness Plan.

- **Staffing and Resources.** Identify staffing and related resources available to assist in a disaster and how they will be mobilized to target disaster areas in need. Explain how the State/counties will manage the increased administrative burden associated with running a D-SNAP and regular SNAP operations simultaneously. See [Staffing](#).
- **Application System Development.** Describe application systems to be used for D-SNAP client management, including any workarounds to the regular SNAP system, considerations associated with running SNAP and D-SNAP operations concurrently, compliance with D-SNAP reporting requirements, etc.
- **Issuance System Development.** Describe issuance systems to be used for D-SNAP client management. For more information on contracting and developing a D-SNAP issuance system. See the EBT Planning section in the Toolkit for State Agencies.

#### County Administered?

County administered States should have plans and agreements in place to allow for sharing of information, resources, and staff across county lines.

- **EBT Card Stock.** Identify EBT card stock available, type of cards to be used, steps and timeline for ordering additional cards, and any special procedures or resources that will be needed to meet ongoing SNAP and D-SNAP issuance timeframes. See [EBT issuance](#).
- **Application Sites.** Describe site selection procedures, including potential application/issuance sites for disasters that vary in size and scope and any agreements in place with those locations. If D-SNAP will operate out of local offices, explain how application sites will handle running D-SNAP and SNAP concurrently. See [Application Sites](#).
- **Data.** Identify general demographic data that can help the agency tailor its response to a disaster. Identify available data and information from sources such as Social Security, Supplemental Security Income, Medicaid, or community-based organizations that can be used to locate vulnerable populations. Identify resources for disaster impact data, including preliminary data assessments, flood maps, or electrical outage data. See [Data Collection](#).

### Implementation Plan.

- **Public Information and Outreach.** Describe public information strategy to ensure timely, accurate information reaches those in need. Outline roles, expectations, and responsibilities of any regular SNAP outreach partners included in the State Outreach Plan that will assist with D-SNAP. Include potential community partner activities focused on identifying and promoting access for vulnerable populations, such as persons with disabilities and the elderly. For more information on community partner involvement and D-SNAP outreach, see the Outreach section in the Toolkit for State Agencies.
- **Retailer Communication.** Describe procedures to notify retailers of new waivers (i.e., Hot Foods) and new D-SNAP clients.
- **Procedures to Reduce Applicant Hardship.** Outline steps State will take to reduce hardship for D-SNAP applicants and ongoing caseload, including provisions for security, human needs, language services, etc... See [Human Comforts](#).
- **Certification Process.** Describe the specifics of the certification process including potential application sites, staffing, separation of eligibility and

issuance, and how application sites will manage large crowds. If online pre-registrations, electronic applications, or other technologies are to be used by workers or clients, describe that process and back-up systems in place if technical issues are encountered. See [Application Processing](#).

- **Client Materials.** Include recipient application and client notices. See Part 1 in the Toolkit for State Agencies.
- **Issuance Process.** Describe how benefits will be made available within 72 hours of D-SNAP application and how to ensure continuation of ongoing SNAP certification, issuance, and other actions concurrently. Indicate how the State will monitor stock levels and ensure sufficient EBT card stock. Describe EBT card reconciliation and security procedures. See [EBT issuance](#).
- **Security and Fraud Prevention Plan.** Describe how the State will ensure security and mitigate the risk of fraud, including a specific plan for handling applications submitted by State agency employees, procedures for handling questionable applications, and process for checking all household members for duplicate participation. See [Fraud Prevention](#).
- **Disaster Reporting and Post-Disaster Review Report.** Describe procedures to ensure that required federal reporting and post-disaster review report will be complete and timely. See [Daily Reporting](#) and [Post-Disaster Review Report](#).

#### Emboss EBT cards?

D-SNAP can put a strain on State processes. States that have time-intensive steps as part of the issuance process, such as individually embossing EBT cards, should have a plan in place to ensure benefits can be issued to a large-volume of D-SNAP applicants within 72 hours.

#### Other State-Specific Considerations

Plans should address any circumstances unique to the State that may affect D-SNAP operations, including coordination of resources among County-level administrations, how to serve isolated populations, development of “work-arounds” to allow SNAP systems to accommodate D-SNAP operations, and contingency plans for local offices located in flood plains or otherwise subject to closure.

### 3.3. State Preparations

In addition to the State Plan, advance preparations, including training staff on D-SNAP policy and procedures, establishing data collection contacts and procedures, and readying State certification and issuance systems, will facilitate an efficient and effective D-SNAP operation.

#### Training

States must provide introductory and ongoing training on disaster eligibility, application, and issuance procedures to relevant county/local and State staff on a regular basis. County or local eligibility staff and supervisors that will work on D-SNAP certification and issuance should be trained or re-trained before beginning to work at D-SNAP sites.

##### ※ Content of Training

States should consider covering the general information below in their D-SNAP training. Training sessions held prior to the start of disaster operations should include information specific to the disaster, in addition to the following.

- Overview of D-SNAP certification process, including any special D-SNAP systems. See [Application Processing](#).
- Roles and responsibilities for each person (screener, eligibility worker, supervisor, etc) and lines of supervision. See [Staffing](#).
- Eligibility policy including: eligibility criteria, calculating eligibility, identifying the benefit period and deductible disaster-related expenses. See [Eligibility](#).
- Verification requirements, acceptable documentation, and procedures for handling questionable applications. [See Verification](#).
- Application forms and client notices.
- Issuance of benefits, including: use of allotment tables (if applicable), any onsite card/PIN issuance activities (if applicable), client training on card usage, lost card replacement, PIN changes, etc. See [EBT issuance](#) and the EBT Planning Section in the Toolkit for State Agencies.
- Fraud prevention, including: formal fraud control measures in place, duplicate participation checks, special procedures for employee applications (including that 100 percent reviews will be conducted of approved employee applications). See [Program Integrity](#) and [Fraud Prevention](#).
- Compliance with Civil Rights laws, including providing reasonable accommodations for applicants with disabilities.
- Public information (who is authorized to issue statements to the media). See [Public Information](#).

- Personnel matters, including: transportation to sites, hours, breaks, pay, safety, stress management, communication with disaster survivors. See [Staff Comfort & Health](#).
- Role of outreach partners. See [Volunteers](#) and the Outreach section in the Toolkit for State Agencies.

#### Staff Orientation Guide

A disaster orientation guide posted on the State's website or provided on site can be very helpful to staff during a disaster operation. FNS encourages States to develop such a guide in advance and add updates depending on the particular circumstances of the disaster and D-SNAP. A thorough orientation guide includes some or all of the following:

##### General items

- Time sheets
- Safety information (e.g., water use, aftershock precautions)\
- Fliers on preventing stress (see <http://mentalhealth.samhsa.gov/publications/allpubs/KEN-01-0098/>)
- General contact information for State agency, State Emergency Management, Outreach partners

##### Disaster-specific information

- Location of disaster service sites, contacts and phone numbers
- Transportation arrangements to and from site(s)
- Identification needed for access to site(s)
- Lines of authority
- Maps (showing sites, hotels, airport, etc.)
- List of onsite contacts, their hotels, and phone numbers

#### Data Collection

Agencies should make an effort to obtain and update demographic data during pre-disaster planning and establish plans for how to evaluate impacted populations once the disaster has struck.

#### Demographic Data

Although demographic information is not a required component of the D-SNAP plan, having gathered general data can help the agency tailor its response to a

disaster. Data on the following elements for each County will help State agencies to respond appropriately when a disaster strikes:

- Income levels
- Percentage of SNAP households
- Primary languages spoken
- Percentage of elderly/disabled and infant populations

#### **Disaster Impact Data**

The State should have a plan in place for gauging the impact of the disaster in order to determine if D-SNAP is the appropriate response and, if so, target areas most in need. This information is critical in making decisions about staffing, resource allocation, the length of the application period, and the most appropriate D-SNAP application sites. While FNS will consider various data sources in making a determination on mass supplemental issuance, or mass replacements, FNS will ask the State to provide data or other evidence that at least 50% of households in a certain defined area (i.e., county, neighborhood, Zip Code, etc.) have been impacted by the disaster.

The most commonly used data are power outage charts and maps which indicate an extended outage of four hours or more affecting the majority of the population. At times, States have difficulty obtaining this information in post-disaster situations. Developing contacts and lines of communication in advance will help ensure that State agencies are able to get this information when they need it. FNS recommends working with some or all of the following to establish connections in advance of a disaster:

- Utility Companies
- State Emergency Management
- Governor's Office
- State LIHEAP Coordinator

#### **State Systems**

The State must have systems established and in place to ensure efficient and effective D-SNAP certification, issuance and reporting, including checking for duplicate participation. Refer to EBT Planning section in the Toolkit for State Agencies for more information.

## Part 4. Requesting a D-SNAP

This section is designed to cover the time period from when the disaster strikes through the submission and approval of the D-SNAP request. While good pre-planning is crucial for successful programs, States must also be prepared to revise and adapt their plans and to quickly develop the details of the request and logistics of the program for each incident.

Topics covered in this section include:

- Determining the Appropriate Disaster Response
- Post Disaster/Pre D-SNAP Considerations
- Decisions to be Made Prior to the Request
- Drafting the Request
- Post-Approval
- Additional Resources

### 4.1 Determining the Appropriate Disaster Response

Each disaster is unique. FNS offers several options for States and communities recovering from a disaster to provide food for their citizens, including:

- USDA foods for shelters and other mass feeding sites
- USDA foods for distribution directly to households in need in certain limited circumstances
- D-SNAP benefits provided directly to households for purchasing food
- SNAP waivers to assist ongoing households in the affected area. See [Other Disaster Waivers](#).

Often, some combination of these options will be utilized in order to meet the changing needs of survivors through the response and recovery process. The most appropriate response is also determined by the scale and scope of the disaster and the type, if any, of Presidential Disaster Declaration that has been issued.

#### Useful Resource:

<http://www.fema.gov/news/disasters.fema> includes an updated list of disaster declarations, including the type of declaration and approved areas.

 **Be Proactive**

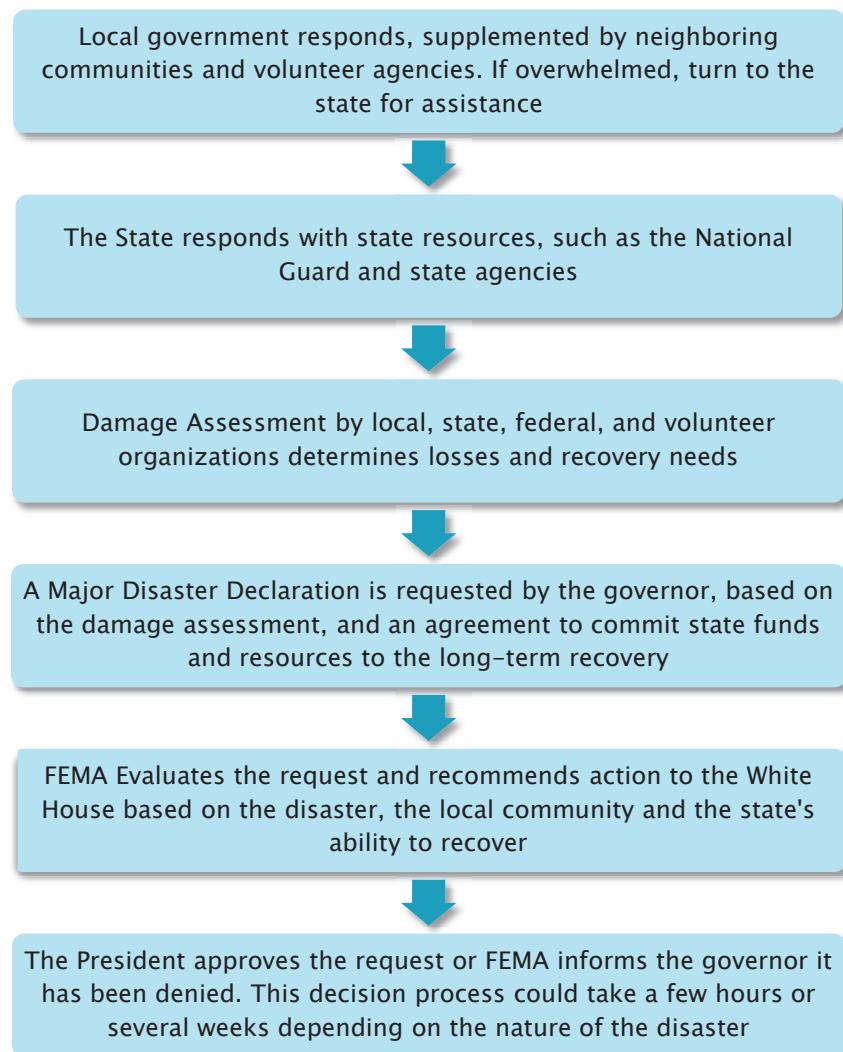
Early and frequent communication among the State agency, FNS Regional and National Offices is vital for successful programs. Disasters can sometimes be anticipated and, whenever possible, States are encouraged to begin conversations about potential responses with their respective Regional Offices prior to the date the disaster strikes. After the disaster has struck, States should keep their Regional Offices apprised of any activity related to preliminary damage assessments and requests for an Individual Assistance declaration. ROs will promptly inform the National Office of any developments and provide technical assistance to impacted States as they develop any necessary waiver requests. The ROs will provide their analysis and submit State requests to the National Office the same day they are received. Every effort will be made to review and respond to State requests within 24 hours of their receipt by the FNS National Office.

During each D-SNAP planning and implementation, a clear communication plan should be established at the State, Regional, and National Office levels. In order to facilitate timely and frequent communication and troubleshoot potential issues, ROs should designate contact people for each disaster and provide off hours contact information to the National Office in the event that questions need to be answered or approval provided on evenings, weekends, or holidays. The National Offices strongly recommends that each RO to collect this information from its respective State agencies as well.

### The Individual Assistance Declaration

FNS policy provides that States may request to operate a D-SNAP once the President has issued a major disaster declaration for *Individual Assistance*. Other types of major disaster declaration include public assistance and hazard mitigation. A Major Disaster Declaration usually follows these steps:

Figure 6: The Disaster Declaration Process

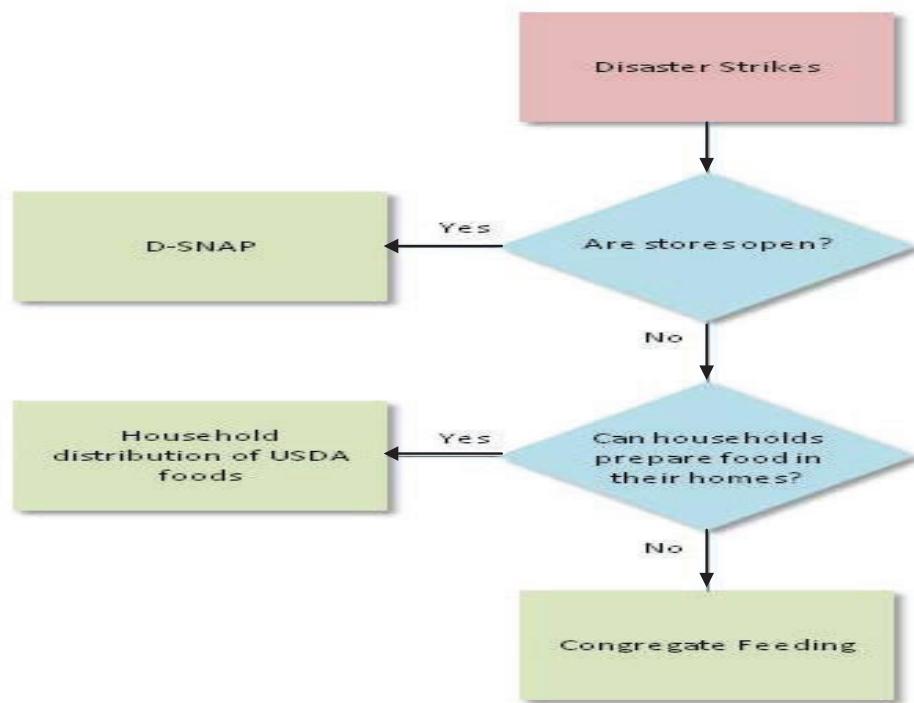


### Is D-SNAP Best?

The Individual Assistance declaration does not necessarily mean that D-SNAP is the appropriate response, or that it should be implemented in all areas that received the declaration. D-SNAP is designed for situations where a large number of households have disaster-related expenses not considered by the regular program and where the need is so great that the vastly streamlined D-SNAP certification process is warranted. When developing a disaster response, FNS encourages States considering a D-SNAP to gather as much information as possible about the extent of the damage, population demographics in affected areas, and the readiness and availability of resources (such as staff, application sites, etc.) in addition to the considerations noted below.

The following chart illustrates the process flow of determining the most appropriate response to meet the food needs of disaster survivors. It's important to remember that as the decision points change over time (i.e., power is restored and households that could not prepare food at home are now able to do so), so too does the response indicated. For example, a county that was struck by a disaster 3 days earlier may be best served by congregate feeding; however, two weeks later, D-SNAP could be the appropriate response.

Figure 7. Evaluating Food Aid Options



By the same token, conditions may vary so much within the disaster area that household distribution of USDA foods may best serve one area, while the population in another is in need of a D-SNAP. This could be the case if a small, isolated area and a large, densely populated one were both struck by the same disaster. In the larger area, retailers may be operational and roads passable, allowing household to use their D-SNAP benefits. In the rural community, stores and congregate feeding sites may be difficult to access and a household distribution of USDA food may best serve the population.

### Other Disaster Waivers

Certain SNAP waivers handled by FNS' Retailer Policy and Management Division (RPMD) can be utilized to assist ongoing households impacted by the disaster, either instead of or in addition to a D-SNAP. State Agencies must provide waiver requests to their FNS Regional Office, which transmit the requests to RPMD for processing. The following three RPMD waivers are the most frequently requested and approved:

- **Automatic/Mass Replacements** – Per SNAP regulations, replacement benefits are always available by affidavit to SNAP households anytime they experience an adverse effect causing them to lose food purchased with their benefits. This waiver allows the replacement of a certain percentage of a household's benefit (depending on the time of the month and the State's issuance cycle) without the need to submit individual requests. This waiver may be granted without an IA declaration. This waiver does not remove the responsibility of local offices to process individual affidavits before or after the waiver implementation as required by 7 CFR 274.6(a).
- **Hot Foods** – A waiver of the hot foods exclusion in the Food and Nutrition Act allows SNAP households to purchase hot, prepared foods at authorized retailers with their EBT cards. FNS has the authority to grant this waiver when an IA declaration has been issued and may extend the waiver to areas beyond those that received the IA if households that lived in the disaster area have been displaced or temporarily relocated to other parts of the State.
- **Timely Reporting** – This waiver extends the 10-day timeframe in which SNAP households must normally report the loss of food purchased with their benefits and request replacement benefits. This waiver may be granted without an IA declaration.

## 4.2 Post Disaster / Pre D-SNAP Considerations

Before planning for the specific disaster program can begin, several other factors need to be considered, including overall readiness for the program and how to balance the needs of both ongoing and D-SNAP households.

### Immediate Response

In an effort to speed aid to their citizens, States sometimes attempt to begin D-SNAP operations too soon. As noted in the chart above, D-SNAP is not appropriate if floodwaters have not receded, power has not been restored to the area, roads are impassable, or retailers are not operational. Under these circumstances, FNS encourages States to delay the implementation of D-SNAP operations until the program can more effectively serve households as they begin to return to their homes and regain the ability to shop, cook, and store food.

### D-SNAP Timing

Experience has shown that it generally takes a minimum of one week following a disaster before communities are ready for a D-SNAP – longer for large-scale disasters. FNS believes it is in the best interest of both States and applicants if the program does not begin too soon, when survivors are likely focused on their more immediate needs and may not be able to appear at the D-SNAP site or use their benefits.

Past D-SNAP operations have shown that programs that start too early often have few applications in the first several days. As the community begins to recover and word spreads about the D-SNAP, application sites are sometimes overwhelmed with more applicants than they are able to serve in the remaining days, which can cause security issues. In such situations, the State agency often requests an extension of the application period. Extended application periods result in increased staffing and resource costs for the State and may increase the likelihood of fraud in the program.

Based on lessons learned in past disasters, FNS recommends beginning program operations:

- No earlier than 1 week after the disaster struck;
- At least 2 days after FNS approval, to allow sufficient time for publicity, staff training, and site preparations;
- After preliminary damage assessments, power outage, flood and/or evacuation maps are available in order to estimate the number of potential applicants and areas where it may be appropriate to target mass replacements/supplements.

In addition, before D-SNAP benefits can be issued, the State must determine if enough authorized food retailers are open in and around the disaster area. States should work primarily with their EBT contractors to determine how many authorized SNAP retailers in a disaster area have working point-of-sale (POS) terminals and available telecommunications to process EBT transactions. If necessary, the manual voucher process can be used.

**ALERT**

FNS' Retailer Policy and Management Division can utilize the ALERT system to help identify how many authorized retailers in the disaster area are able to process transactions.

**Continued Operation of Regular SNAP**

States preparing to operate a D-SNAP need to plan appropriately for management of their ongoing SNAP caseload, as the regular program must continue uninterrupted during D-SNAP operations. Ongoing clients may need replacement benefits or may contact or visit their local offices to inquire about eligibility for supplements or D-SNAP benefits. Ensuring the ongoing clients will continue to receive uninterrupted benefits and timely actions on their cases is just as important as meeting the needs of new D-SNAP applicants. The addition of the D-SNAP caseload can tax already busy offices and planning for the effective sharing of resources between the two programs, including bringing in staff from other jurisdictions, directing D-SNAP applicants to an alternate site, and arranging for overtime pay are all important issues to consider before D-SNAP operations can begin.

### 4.3 Decisions to Be Made Prior to Request

States must make a number of decisions before drafting and submitting a D-SNAP request. The following items should be discussed and considered carefully in the days following a disaster.

**Application Period**

FNS generally approves an initial application period of up to 7 days. States may opt to use some or all of the 7 days at their discretion. Except in extreme circumstances, this length of time has proven to be sufficient for all applicants in need and helps to protect program integrity.

Application periods may be staggered across counties (or other areas) as needed to maximize staff and resources. Applicants may also be instructed to come on a specific day or days based on some arbitrary factor, such as the first initial of their last name, in order to avoid overcrowding. All applicants at the site must be served, even if they

do not come on their designated day. Providing a ‘catch-all’ day or two at the end of the application period for anyone who missed their designated day is a best practice with this approach. States choosing these options should clearly explain why they believe it will better serve applicants and staff to do so and present a clear plan for publicizing and responding to questions about the roll-out or specified applications dates.

### Application Sites

For each disaster, the State must determine the exact number and location of application/issuance sites. In small-scale disasters, States may wish to use the local office as the D-SNAP application site. In each disaster situation, the State should make clear in its publicity materials if applicants may come to any site or each site is specific to residents of a given county or local area. Where the State predicts a large number of applicants or where local offices have sustained damage, FNS strongly recommends the selection of an alternate site(s). Some commonly used alternate sites include:

- Schools
- Stadiums
- Libraries
- Mobile Vans
- University auditoriums
- Rented trailers/trucks

Some States have chosen to co-locate their D-SNAP site with a FEMA Disaster Recovery Center (DRC). FNS cautions that DRCs may not continue operation for the entire application period or may be overwhelmed by the number of D-SNAP applicants so States choosing this approach should prepare good contingency plans for back-up sites as needed. States may also consider collaborating with their local public transportation authority and community partners to provide transport to and from application sites for remote populations, the elderly, and persons with disabilities. See the Application Site Selection Guide in the Toolkit for State Agencies, which includes useful considerations in choosing the most appropriate sites.

### Benefit Period

The benefit period is the 30-day timeframe in which household income, resources, and disaster-related expenses are evaluated. The date the disaster struck (or the date a mandatory evacuation order went into effect, if applicable) should generally be used as the first day of the benefit period to ensure that all eligible disaster-related expenses can be captured within it. Household composition for D-SNAP purposes is also

established on the first day of the benefit period. For more information on determining the benefit period see [Benefit Period](#).

### Supplements

Supplements are an essential component of the disaster response, bringing ongoing SNAP households affected by the disaster up to the maximum allotment for their household size. By virtue of their participation in the regular program, the food needs of SNAP households are already known and the impact of additional disaster-related expenses will weigh heavily on this low-income population. Supplemental benefits in order provide parity between new D-SNAP households and ongoing clients, who are not eligible for D-SNAP benefits.

Figure 8. Calculating the Supplemental Benefit Amount



The request to issue supplements and the supporting justification should be included, whenever possible, in the State's D-SNAP waiver request. States should be aware when drafting their D-SNAP plans and waiver requests that ongoing SNAP clients need not appear in person at the D-SNAP site. Since their identity and circumstances are already known to the State agency, it is not necessary that they fill out a complete D-SNAP application or be interviewed in order to receive replacements (discussed in the next section) or a supplemental issuance.

#### \* Individual vs. Automatic Supplements

In a given disaster, the State agency must decide if it is most appropriate to issue supplemental benefits on an individual basis, via the filing of an affidavit by the household, or automatically, to all ongoing SNAP households in a designated area. Individual supplements work best in areas where there is a small-scale disaster and applicant volume is not anticipated to be very high. In order for individual supplements to be effective, the State agency must have the capacity to handle

requests for supplements and issue the supplemental benefits while it is also taking applications from and issuing benefits to new D-SNAP households.

In order to obtain a supplement, households may complete an affidavit of disaster loss in person or by mail. A template can be found in the Toolkit for State Agencies. FNS encourages States to allow ongoing clients to request affidavits over the phone and submit them by mail, alleviating potential crowd control issues at the D-SNAP site or local office. Ongoing clients must make their request for these affidavits during the D-SNAP application period. If requests are being accepted by phone, the State agency must provide the client with a reasonable timeframe, such as ten days, by which to return or mail the affidavit.

States with the technological capabilities to provide affidavit forms online may do so. The State can choose to have these online forms printed, signed, and returned to the office, or electronically signed and submitted online, depending on the specifications of the State's system. The forms should only be made available during the application period. State selecting this option must also provide alternative means of obtaining and submitting affidavits for households that cannot or prefer not to access documents online.

Automatic supplements generally work best when there is a large-scale disaster and the State agency is able to identify households that experienced adverse effects as a result of the disaster. Automatic issuance can help the State agency quickly and efficiently meet the needs of ongoing clients, while freeing up staff and resources to assist the population of new D-SNAP applicants. However, States should bear in mind that, even in highly impacted areas, the issuance of automatic supplements will provide these benefits to some households that were not affected. This waiver does not preclude the State from accepting individual affidavits before or after the waiver implementation as required by 7 CFR 274.6(a).

States must include their plan to issue automatic supplements in their D-SNAP requests and must be able to effectively target the benefits to geographic areas that were heavily impacted by the disaster. Ongoing SNAP households not receiving automatic issuance but who were living in the disaster area and experienced disaster losses may still request supplemental benefits via affidavit.

Targeting the benefits to where they are most needed can be achieved through the use of data such as:

- Preliminary Damage Assessments
- Flood or mandatory evacuation maps
- Power outage information (outage maps, lists of affected Zip Codes, etc...)

The information that can best support the need for automatic issuance will vary by the type and scale of the disaster and the parameters of the D-SNAP. FNS encourages States to work closely with their respective Regional Offices in order to determine how to best find, use, and evaluate available information in a post-disaster situation.

Requests for automatic supplements must be accompanied by some form of supporting data which indicate that a majority of the population in given area has suffered an adverse effect as a result of the disaster. It is important to note that automatic supplements need not be issued only at the county level. For example, if the data show that a given zip code within a declared county was most heavily affected, automatic supplements can be targeted to those zip codes and individual supplements via affidavit made available through the rest of the county.

### **Replacements**

Per SNAP regulations, replacement benefits are always available on an individual basis to ongoing SNAP households that lose food purchased with their benefits, provided they report the loss within ten days. If a State believes that the severity of the disaster would prevent households from requesting replacement benefits within the normal timeframe, it can request a waiver of the timely reporting requirement in order to allow impacted households sufficient time to report their losses and request replacement benefits. This waiver request is handled by FNS' Retailer Policy and Management Division and does not require an IA declaration. Under the waiver, if the timely reporting day end date falls on a weekend, the reporting period is extended to the next business day.

#### **\* Automatic/Mass Replacements**

The automatic/mass replacement waiver allows a State agency to replace a portion/percentage of currently certified households' monthly SNAP allotments in a disaster without the requirement that a household request a replacement, individually, and travel to a local office to sign an affidavit of loss. Under this waiver, households will not have the added burden of signing paperwork and local offices will not have to process cases manually for each household needing a benefit replacement.

The replacement percentage is not fixed and generally depends on the time of the month in which the disaster took place as well as the State's issuance schedule. The request for an automatic/mass replacement waiver is handled by RPMD and may be

requested even if there is no disaster declaration or the State does not plan to operate a D-SNAP.

The State needs to assess the extent of the losses to make a determination as to the percentage of benefits to be replaced. The automatic/mass replacement waiver should be submitted to the Regional Office. The Regional Office will forward the waiver request to RPMD for consideration.

Although each request is handled case by case, RPMD considers various data sources when making an automatic/mass replacement determination, such as evidence that 50 percent of the households in a defined area (i.e. county, zip code, and neighborhood) have sustained damage that lead to food loss. The most commonly used data is power outage charts or maps which indicate an extended outage of four hours or more affecting the majority of the population. Four hours is the minimum power outage time needed, but States may choose to designate a longer timeframe, if appropriate. In addition, the likelihood of perishable vs. non-perishable food loss should be taken into consideration. For example, during a power outage, only perishable food would be lost, however, in a flooding situation, both perishable and non-perishable food items may have been lost.

### **Food Loss**

The loss of food due to the disaster can have a profound impact on vulnerable households. Households already known to be most in need – ongoing clients – can always request the replacement of lost food that was purchased with their SNAP benefits. In recent years, many States have opted to allow new households whose only adverse effect is food loss to qualify for D-SNAP if they are otherwise eligible. This policy results in a higher number of eligible households which may lead to increased crowds at D-SNAP sites. States interested in using food loss alone as a qualifying factor for D-SNAP eligibility should carefully consider the needs of the effected population and the resources available to serve large numbers of applicants.

Figure 9. Questions to Consider in Using Food Loss Only



It is D-SNAP policy that food loss should be verified where questionable. Any State considering a “food loss only” eligibility policy should use available verification, such as power outage maps showing affected homes or zip codes, to guard against fraud in this area. The use of this information should be widely publicized and households screened upon arrival to verify their residence in the affected area. Households reporting excessively large amounts of food loss, or any other questionable information, should be referred to fraud investigators or senior staff for further review and the State may consider delaying issuance of D-SNAP benefits.

#### **Disaster Standard Expense Deduction**

With FNS approval, a State may choose to utilize a Disaster Standard Expense Deduction (DSED) in lieu of actual disaster expenses incurred by a household, provided that food loss alone is not the only qualifying expense. The DSED currently used by several States is based on information gathered from actual disaster-related expenses reported in a prior D-SNAP in which food loss alone was not a qualifying disaster loss. As the DSED is designed to capture food loss along with other disaster-related expenses, such as loss of income and damage to or destruction of property, it must not be applied to cases in which food loss is the only disaster-related expense.

Only households with actual, unreimbursed disaster-related expenses equal to or greater than \$100 qualify for the DSED. Households with deductible disaster-related expenses that fall below the \$100 threshold should have their eligibility determined using their actual expenses. If a household has disaster expenses which exceed the DSED for its size, the State may, at its option, use actual expenses to determine eligibility. This requires materials and worker training on both methods of eligibility

determination. All applicants must list the type and value of their actual disaster-related expenses on their D-SNAP applications.

For households with \$100 or more in deductible disaster-related expenses, the DSED is added to the Disaster Gross Income Limit (DGIL) and households whose take-home pay plus available liquid resources is less than or equal to the DSED+DGIL would qualify for D-SNAP benefits. The DSED-DGILs are updated annually and the amounts for the appropriate fiscal year should be used for each disaster program.

Figure 10. Example Determining Eligibility with Disaster Standard Expense Deduction

*The State computes DSED-DGILs using a DSED of \$1,187 for a 3-person household + the \$2,151 DGIL for the same household size to arrive at a limit of \$3,338.*

*A 3-person household applies for D-SNAP and attests that it has incurred deductible disaster-related expenses during the benefit period.*

*The eligibility worker compares the household's actual take-home pay and liquid resources of \$3,072 to the limit of \$3,338 and determines that the household is eligible for D-SNAP.*

States electing this option should include it, along with the approved income limits in their D-SNAP plans. States may utilize the existing DSED or may create their own based on actual expenses reported in past D-SNAPs. Any State wishing to create a new DSED must do so in consultation with FNS. In reviewing State D-SNAP plans each year, FNS Regional Offices must inform the National Office of any States that intend to utilize the DSED option. While a State may deviate from its plan to either use a DSED or not depending on the circumstances of a given disaster situation, FNS encourages forethought in this area, as the use of the DSED requires updated annual figures,

potential modifications to materials, including D-SNAP applications, and thorough staff training.

As with any option, there are a number of issues to consider before making a decision about the use of a DSED. FNS urges interested States to weigh these factors, to discuss possibilities with their Regional Office, and to engage other States that have utilized a DSED in the past to share lessons learned.

Figure 11. Best Practices of Utilizing a Disaster Standard Expense Deduction

#### DSED is best suited to disasters where:

- Most households incurred damages to their homes, not just power outages
- The number of applicants is likely to be high and the streamlined certification process with the DSED would promote timely processing of applications
- Disaster impact data, such as power outage, flood, or evacuation maps are readily available to the State agency for verification
- Sufficient resources are in place and staff have been adequately trained on both the normal D-SNAP and DSED eligibility calculations

#### 4.4 Drafting the Request

D-SNAP requests must be submitted with a signed cover memorandum from the State and should include thorough explanations of the components listed below. Well documented requests can be considered and approved more quickly, minimizing the time needed for follow-up and revisions. Providing careful consideration of these components in the request helps give FNS a more complete understanding of the situation on the ground, the State's readiness to begin program operations, and potential red flags that could inhibit the State's ability to implement a successful program. Submitting this information up front gives FNS and the State partners adequate time to make any necessary changes without delaying the start of program operations.

When transmitting requests to the National Office, FNS Regional Offices should note any deficiencies in the State requests. Requests should be transmitted to the NO the same day they are received in order to minimize the time between submission and approval. The National Office can review the request and begin preparing a response at the same time the RO is working with the State agency to clarify questions and obtain any additional information. FNS strongly encourages the use of the D-SNAP Waiver Request Template included in the Toolkit for State Agencies. The template includes fields for all of the components noted below.

### Components of the D-SNAP request

- **Disaster.** Describe the incident – what, when, where.
- **Area.** Note the geographic area included in the IA declaration and explain any differences between the area included in the declaration and the requested area in which to operate the D-SNAP.
- **Application Period.** Give the start and end dates of the application period. If it will be staggered, give dates for each county/area. Note if application sites will be open over the weekend or for extended hours.
- **Benefit Period.** Note the start and end dates of the 30-day period. The start of the benefit period should generally match the first day of the “incident period” on the disaster declaration. If not, explain the reason for the difference.
- **Eligibility.** Include information on any options the State has chosen, including whether or not food loss only will be a qualifying expense and if households that worked but did not live in the disaster area will be eligible.
- **Expenses.** Is a disaster standard expense deduction (DSED) being used? If so, include income limits.
- **Ongoing Households.** Will supplements be automatic or individual (by affidavit)? If automatic, describe who is eligible and include supporting data. Also, indicate an estimate of the value of issuances for automatic supplements. If individual, include information on the process for requesting supplements – by phone/mail affidavit or in person at local office/D-SNAP application site.

- **Affected population/anticipated number of applicants.** Include total number of people, homes, businesses, etc... impacted by the disaster, estimates of anticipated D-SNAP applicants, number of ongoing households to be served, and an explanation of how both estimates were derived.
- **EBT.** Describe issuance procedures, the number of cards on hand, and plans for requesting, receiving, and distributing additional cards as needed.
- **Logistics.** Describe application site(s), plans for publicity, and security/crowd control. Address potential access issues for the elderly and persons with disabilities.
- **Staffing.** Include plans for utilizing staff from other program areas, counties, or States, as appropriate. Indicate number of staff available and how staff/supervisors will be distributed among the application sites.
- **Public Information/Outreach.** Describe how program information will be disseminated to the public. List partner organizations involved and describe the responsibilities of each, including the role of volunteers, if applicable. Examples of partner activities include spreading D-SNAP information on behalf of the State or providing onsite application assistance.
- **Duplicate participation.** Indicate how/when checks will be conducted and include information on any special circumstances, such as border State issues.
- **Program Integrity.** Describe fraud prevention strategies and security measures in place.
- **Employee applications.** Describe procedure for identifying and handling applications by State agency/State employees. See the [Prevent Employee Fraud](#) section for full list of required measures.
- **Additional information.** Include draft press releases, sample application, Preliminary Damage Assessments, IA declaration, and map of disaster area. In addition to these required items, any other supporting documentation may be included.

## 4.5 Post-Approval

In a post-disaster environment, everyone wants to ensure that survivors have access to the resources they need, so D-SNAP requests and approvals move quickly. After a D-SNAP has been approved, the program may need to change for various reasons, such as the addition of a new county to the IA declaration, an overwhelming number of applicants, or a policy decision made at the State level. These circumstances, as well as options for handling the transition back to normal program operations are discussed below.

### Changes to the D-SNAP after Implementation

The Stafford Act gives FNS authority to approve D-SNAP requests and any changes to the D-SNAP require signed waiver approval from FNS. As with the initial submission, State agencies must submit written, signed requests for changes to a D-SNAP.

Regional Offices should provide informal notice of any potential changes (via phone or email) to the National Office as soon as they become aware of the State's desire to submit the request.

These requests, and their corresponding approvals, are generally shorter and can be approved more quickly than the initial waiver, since much of the information about the disaster is already known. The three types of changes to the D-SNAP are listed below, along with an explanation of each.

***Expansion:*** After initial approval, a State agency may want to expand operations because an additional county has been added to the IA declaration or because the State determined that a previously declared county was in need of the program. While the application period in the expanded area may differ from what was originally approved, the benefit period will generally remain the same. In such cases, the State agency should submit to FNS a request for expansion, detailing the impact of the disaster in the new area, the application period, and the anticipated number of applicants and ongoing clients that will be served. If the benefit period will change, for example, because flooding due to the same storms struck another County at a later date, the new benefit periods dates and justification should also be included.

***Extension:*** In some cases, States may find that their initial application period is not sufficient to serve all eligible households and they may wish to request that the application period be extended. In considering extension requests, FNS carefully weighs ongoing need in the area with program integrity concerns. Requests to extend the D-SNAP application period must be submitted with sufficient time for FNS review

and approval prior to the end of the initial application period and should be accompanied with strong justification of the need for additional time. Note that once the application period has ended and operations have closed, further extensions are not permitted.

***Modification:*** A request to change an aspect of the D-SNAP other than those mentioned above is known as a modification. Most modifications, including any that would affect applicant eligibility, should only be made prior to the start of the application period to ensure that the eligibility criteria are applied equitably to all applicants. Occasionally, modifications may be made after the program has begun, such as when a State that was originally approved for individual supplements decides to issue automatic supplements in a certain area. Because of the limited window of time in which most modifications can be requested, FNS encourages State agencies to carefully consider their desired program options prior to submitting their initial request.

## 4.6 Additional Resources

Resources to assist States in drafting their D-SNAP requests and planning for program operations, including application and affidavit templates, sample press releases, a site selection checklist, and a list of State/Regional contacts can be found in the Toolkit for State Agencies.

## Part 5. Operating a D-SNAP

This Section offers guidance for State agencies as they prepare to implement their D-SNAPs.

Highlights include:

- Public Information
- Site Set-Up
- Application Processing
- EBT Issuance
- Daily Reporting
- Fraud Prevention
- Changes to the D-SNAP
- Troubleshooting Administrative Challenges

### 5.1 Public Information

It is essential to take a proactive approach to public information and outreach from the start of the disaster response. Providing accurate, timely information to the public about what D-SNAP is, how it works, and who may be eligible is a crucial first step in ensuring a successful program. FNS recommends allowing at least 2 days from the start of publicity efforts to the beginning of the application period to allow people enough time to hear and absorb the messages being presented. Experience has shown that offering clear, consistent information about the topics below is particularly important for crowd control, efficient application processing, and program integrity.

In developing public information campaigns, States should utilize all available outlets to reach people. Given the fast pace of D-SNAP and the increasing use of social media, such as Facebook and Twitter, by the public, FNS encourages States to use these new ways of communicating in addition to traditional means, such as press releases, radio and television PSAs, State websites, and newspaper articles. If State policy allows, FNS encourages State agencies to explore the use of social media to broadcast messages to the public about the items below. At minimum, States should closely monitor social media sites for misinformation and potential program integrity concerns.

Organizations with whom the State agency partners for SNAP outreach can also assist in getting information out to the public about D-SNAP. However, the State must

ensure that partner organizations have a solid understanding of D-SNAP, the ways in which it differs from SNAP, and the specific eligibility criteria and operational details of each program. Clearly defined roles and responsibilities as well as lines of communication, as discussed in the planning section, will help outreach partners to serve as an effective resource in disseminating accurate, up to date D-SNAP information to the affected population.

### **D-SNAP Eligibility Criteria**

States have reported varied experiences with publicizing D-SNAP eligibility criteria. Some find that it helps keep ineligible people from coming to the application sites while others feel that it can have a negative impact on program integrity. FNS encourages all States to publicize the geographic criteria, including whether those who lived or worked in the area may apply. The public must also be informed that all applicants are required to bring proof of identification and should bring any other verification documents they may have. States should carefully consider whether they believe releasing the income limits and the use of food loss as a qualifying criterion is in the best interest of their respective programs. Sample press releases in the Toolkit for State Agencies offer examples of both releasing the specific information and of a more general notice that advises low-income households with disaster-related expenses that they may qualify.

### **D-SNAP & Ongoing Clients**

Ongoing SNAP households may be confused about their D-SNAP eligibility. Disaster benefits for SNAP clients come in the form of a supplemental issuance to bring their benefit to the maximum monthly allotment for household size. Public information materials should clearly indicate the State's supplement policy and provide affected SNAP households with directions on how and where to obtain their supplemental benefits. If supplements are being issued automatically, the material should encourage ongoing households not to come to the site in person. Public information materials should provide a contact number or a website where SNAP households can find answers to any questions about their disaster benefits, including supplements and replacements.

### **Where & When to Go**

Publicity materials must include application sites for each county or area and should indicate at what site(s) households in a given area can apply. It is important to indicate the operating hours/days at each site, including if they will be accepting applications on weekends or beyond normal business hours. If supplements are being issued in-

person via affidavit, FNS encourages States to direct ongoing clients to their regular SNAP office and set up an alternate site for new D-SNAP applicants.

### What to Bring

States should notify potential applicants of any required and recommended documents to bring to the application site. Even where verification is not required, FNS encourages States to request that applicants bring any documentation they have. Verification requirements are discussed in more detail in Section 4.3.

### Program Integrity

In addition to the notices posted at the application site, public information campaigns prior to the start of D-SNAP operations should inform potential applicants that duplicate participation checks will be in place and that there are civil and criminal penalties for committing D-SNAP fraud. The policy of delaying benefit issuance and conducting further review of questionable applications should also be publicized. The State may also wish to inform the public that it will be using resources such as maps to verify residency in an affected area and wage matches to verify income. See [Fraud Prevention](#) for a complete discussion of this topic.

### Information for SNAP Retailers

In addition to publicizing information about eligibility and application procedures, FNS encourages States to share information about D-SNAP with their authorized retailers and EBT contractors, particularly in large disasters. Information can include:

- Disaster waivers (e.g., hot foods waiver)
- Estimated number of new D-SNAP clients
- Possible changes to EBT card design

## 5.2 Site Set-up

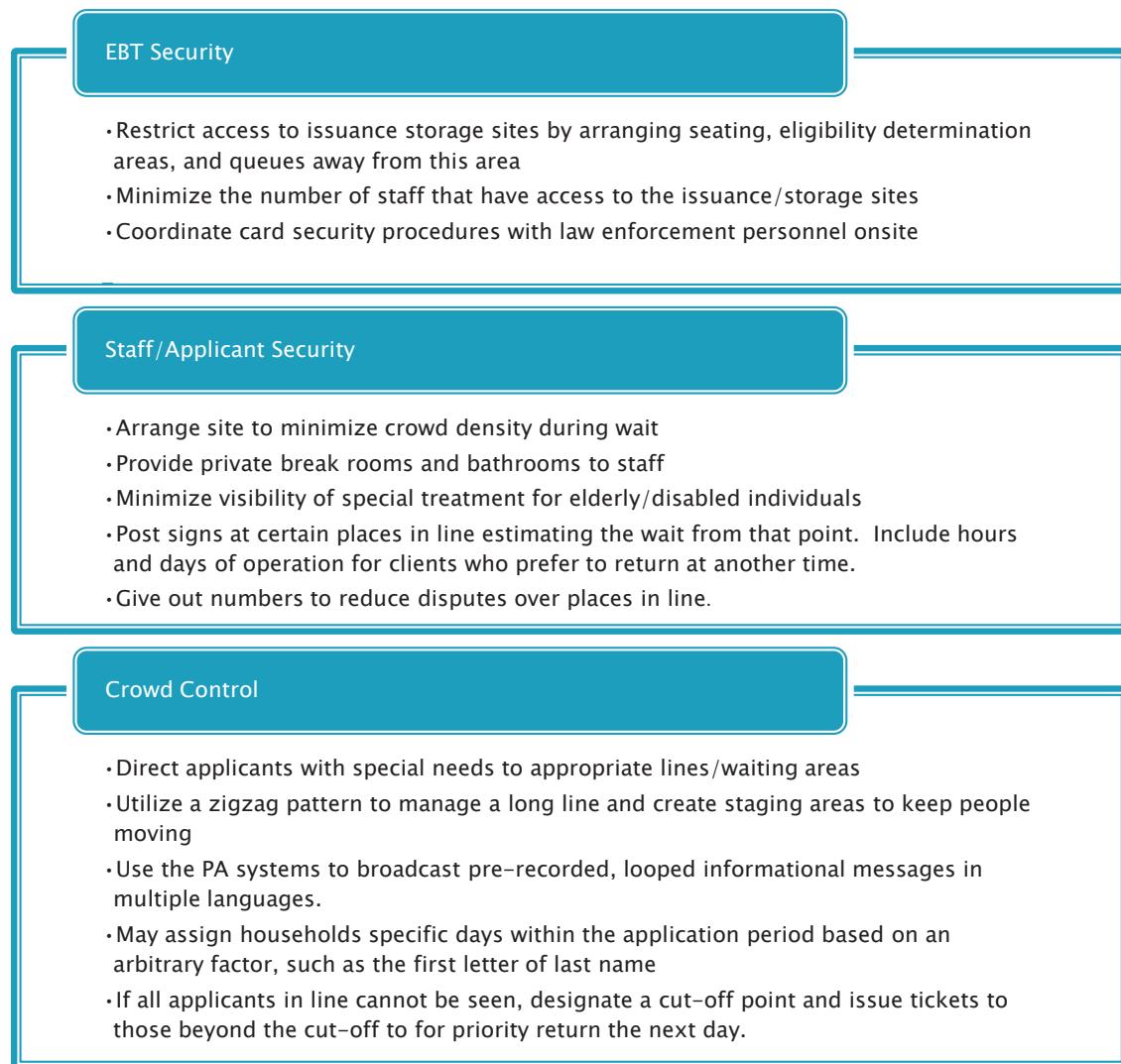
Selecting an appropriate site and designing a layout which allows for orderly and efficient application processing will help ease the burden of administering a D-SNAP and make the experience as comfortable as possible for applicants. A number of checklists to assist in finding and preparing D-SNAP application sites are included in the Toolkit for State Agencies, including:

- Application Site Selection Guide
- Application Site Supply Checklist
- Human Comforts Checklist
- Application Site Readiness Checklist

## Security

Ensure that the level of security is commensurate with the anticipated number of applicants. A strong security presence can go a long way in minimizing fraud and maintaining control of large crowds. Suggestions for improving security on site are detailed in the following table.

Figure 12. Improving Onsite Security



## Staffing

States should anticipate that staff residing in areas affected by the disaster will need time away from work to prepare for or recover from the disaster, so not all county/local staff will be available to contribute to the D-SNAP. In cases where the number of available county/local staff is insufficient to staff D-SNAP sites, States should consider temporarily transferring staff from unaffected areas of their State or requesting assistance from neighboring States. State agencies may also hire temporary staff to operate the D-SNAP, as long as that staff are hired under State merit system rules. State agencies should note that employment records of temporary staff are subject to the same record retention and D-SNAP application review rules as those of permanent staff.

See the “Staffing Suggestions” chart in the Toolkit for State Agencies to help identify some of the staffing needs an agency may have, and some possible sources for needed staff. Approximate staffing levels assume an efficient all-paper process. State agencies employing online pre-registration or web-based D-SNAP applications should expect significant changes to staffing needs and plan accordingly. FNS suggests completing this table with specific sources or staffing needs identified during pre-disaster planning. Maintain a list of the names, potential duties, and phone numbers for key staff for reference during a disaster response.

### ✿ Staff Comfort & Health

A successful program cannot be run without the help of dedicated staff. Staff burnout and turnover can be minimized by providing adequately for their needs. If possible, staff should be provided with:

- Private break rooms
- Separate bathroom facilities.
- Temporary housing (for out-of-town staff)
- Antibacterial lotion/wipes
- Onsite first aid
- Water
- Meals

## Telecommunications

D-SNAP sites will vary in their telecommunications access. States should recognize that these capabilities can vary from one D-SNAP to the next and even from site to site within a single program. Whenever possible, FNS recommends that application sites are equipped with copy machines, scanners, fax machines, landline and/or cellular phones, laptop computers, wireless connectivity, and printers.

Depending on the site's capabilities and the potential for off-site access to the State's eligibility or D-SNAP system, client applications may be entered into the system either on or off-site. In either case, the eligibility determination system used must have the capability to gather and store information on all household members, not just the head of household, and must be capable of performing duplicate participation checks for all household members before determining eligibility. Additionally, the State agency must check denied D-SNAP applications against the eligibility determination system each day, so that households that are denied and later reapply are detected and referred to fraud prevention staff.

### Human Comforts

Addressing the human comfort needs of applicants is very important to the disaster response effort. Applicants may not come prepared for a long wait and will need some of their basic needs provided for at the application site. Ensuring that these needs are met is not only good customer service, but is also beneficial to the staff onsite as it may decrease the likelihood of crowd control issues.

Application/Issuance sites should offer applicants:

- Water
- Protection from the elements
- Bathrooms
- Snacks, when feasible
- Minor medical care, when feasible

### Preparing the Site

Use the "Human Comforts Checklist" found in the State Agency D-SNAP Toolkit, to help prepare your application site for the general population and find special suggestions for serving elderly/disabled applicants.

### Site Layout

As soon as sites are selected, planning for the layout and traffic flow should begin. Developing a flow chart and utilizing it during site set-up can assist in spotting potential bottlenecks and other trouble spots as well as in identifying staffing, security, supply, and other administrative needs. Particular items to consider include:

- **Long lines.** Will it be problematic if lines extend outside? How will this impact the number of applicants, public safety in the area, or local traffic flow?
- **Heavy traffic.** Will traffic to the site overwhelm local roads or affect daily commutes? Should local law enforcement be notified of potential traffic/parking

issues? Can traffic signals be reprogrammed and signs directing people to alternate routes be put in place if necessary?

- **Parking.** Does the site have sufficient parking that will not adversely affect the local neighborhood if there are large numbers of applicants?
- **Weather.** Are all applicants protected from the elements while waiting? How would the site be affected in the event of inclement weather?
- **Privacy.** Are interview areas arranged to allow for applicant privacy?
- **Entrances/Exits.** How will the public's ability to access the site be controlled? Any special considerations if the site is also being used for other purposes (i.e., FEMA DRC, normal public library activities, etc...)

The Toolkit for State Agencies contains sample floor plans, modeled after those used successfully in previous D-SNAP operations, representing a variety of sites and configurations.

### **Posters & Notices**

A State agency must post duplicate participation, fair hearing, and fraud prevention notices at all application sites. Informational materials about how to use an EBT card and advice for using SNAP benefits may be helpful as well, since new D-SNAP households may not be familiar with SNAP rules. Sample posters are included in the Toolkit for State Agencies.

The State agency must provide a written copy of the eligibility determination, as well as written notification of the option for an immediate onsite review for denied applications and of fair hearing rights to all applicants. If duplicate checks are being conducted off-site, the notice should inform clients that any eligibility determination is preliminary and the final determination is contingent upon the subsequent checks to be performed. These notices may be combined into a single document.

### **Language Services**

As previously discussed, gathering demographic information prior to the disaster will help States assess the need for language services in a given project area. States should follow the same guidelines in D-SNAP as outlined in SNAP regulations in determining the need for materials in other languages.

It is important to keep in mind that the population of D-SNAP applicants will extend beyond the low-income population served by the regular program, so the needs of single-language minorities not living in low-income areas should be considered as well.

As part of pre-disaster planning, the State agency should translate materials into the major languages spoken by non-English speakers within the State. After translating appropriate materials, States should keep an electronic copy on file for easy access and use in a disaster. Please see the Toolkit for State Agencies for sample D-SNAP application templates in English and Spanish.

In addition to translated materials, onsite interpretation services may be needed. State should consider all resources available for providing assistance with language interpretation at D-SNAP sites, including:

- Current staff
- Language lines
- Universities
- Churches
- Community centers
- Private assistance agencies
- Advocate/legal services groups

### Volunteers

In the wake of a disaster, members of the community are often eager to share their time and skills in efforts to help those affected. Volunteers can be a great asset to D-SNAP operations, when properly trained and utilized. States planning to use volunteers should familiarize themselves with any State or local regulations surrounding the use of volunteers and liability. Volunteers may not be used to handle any merit staff functions, including interviews, eligibility determinations, duplicate participation checks, or EBT issuance but can provide extensive support to staff and applicants in the following ways:

- ***Translation/Interpretation.*** Provide language services to applicants with limited English proficiency.

### Outreach Coordinators

Each FNS Regional Office has an Outreach Coordinator who can help your State prepare to effectively utilize volunteers and partner organizations through both your Outreach and D-SNAP plans.

- **Greeter.** Welcome applicants as they enter application site and direct them to the appropriate area.
- **Application Assistant.** Distribute applications, pens, and clipboards. Help those who have difficulty understanding or completing the application.
- **Pre-Screener.** Talk to applicants waiting in line about general eligibility criteria (not potential eligibility of a particular household); review applications for completeness before applicants are interviewed.
- **Human Comforts.** Distribute food/water, direct applicants to restrooms or medical facilities, assist applicants with disabilities and the elderly.

#### Disaster Outreach

Find more information about effective disaster outreach and the use of partners in the [Disaster Outreach Toolkit](#).

## 5.3 Application Processing

### Completing the Application

States are responsible for creating and updating their own D-SNAP applications and may wish to use the FNS template as a guide (See the Toolkit for State Agencies for application templates in English and Spanish). While FNS recommends developing a State-specific form during the pre-planning process, the application must be adapted to fit the parameters of each disaster program. For example, an application for a program that is using a Disaster Standard Expense Deduction should not include the normal Disaster Gross Income Limits. The application must include fields for the collection of information on all individuals in a household and may not contain questions designed to elicit information beyond the eligibility requirements outlined in [Eligibility](#). States are restricted from adding other eligibility requirements, without specific FNS approval.

At the D-SNAP site, staff and/or volunteers should be available to distribute applications and answer any questions from households as they complete the forms. Ensure that applications are as complete as possible before clients reach the interview stage; this will help keep the process moving quickly. Post signs with simple instructions, verification requirements, definitions of terms, etc... to aid in this effort.

### ⌘ Online D-SNAP Applications

As States explore the use of new technologies and update their existing systems, some have moved toward online registration and/or application for disaster benefits. Several States have developed online pre-registration systems which go live only during disaster situations. These systems allow households to submit some of the required D-SNAP application information in advance. The system can then perform duplicate participation and other checks before the applicant appears in person at the D-SNAP site for the interview and required verification.

Web-based application systems, used onsite by State agency staff, have also been developed and tested by a number of States. These systems allow for real-time interaction with the State's eligibility system and eliminate the need for clients to complete a paper application. States considering either of these options should confer with their Regional Office to discuss feasibility based on the availability of resources and technical infrastructure.

### Screening

Deploying pre-screeners to the lines or to the pre-interview waiting area is another strategy to control crowds and improve customer service. Screeners should be familiar with basic eligibility requirements so that they can readily share this information with applicants. No applicant should be discouraged from applying; screeners should simply offer information so that each household may make an informed decision about whether or not it is worthwhile to stay and apply. Screeners can also check that applicants have required verification documents and can direct ongoing clients and new D-SNAP applicants to the correct lines.

### Duplicate Participation

As previously noted, information regarding duplicate participation checks should be announced in publicity materials and posted at the application site. States may check for duplicate information up front or may accept applications and inform applicants that eligibility is contingent upon the subsequent duplicate check.

States are required to screen for duplicate participation in:

- D-SNAP and SNAP
- D-SNAP and household disaster distribution of USDA Foods

#### Best Practice

States operating a D-SNAP in a border area may also want to consider running duplicate checks against the SNAP eligibility system of neighboring States, particularly if both States were impacted by the disaster.

- Multiple D-SNAPs with overlapping benefit periods
- Approved D-SNAP and denied D-SNAP applicants

### Interview

The D-SNAP interview, though brief, is an important element in the certification process as it allows the eligibility worker time to review potentially confusing concepts (such as the benefit period and deductible disaster-related expenses) and verify information presented on the application. The State agency must conduct an interview with all new D-SNAP applicants prior to certifying the household for benefits. As in the regular program, households unable to apply in person may designate an authorized representative to apply on their behalf.

#### \* Alternative Procedures to Ensure Access to the Interview

All interviews must be conducted at the D-SNAP site, except under circumstances in which the State agency determines special alternative procedures are required to facilitate the interview for applicants otherwise unable to appear physically at the D-SNAP application site. Best practices for the State agency to consider in providing reasonable accommodations and interview access to the elderly, persons with disabilities, and other vulnerable populations include:

- Satellite application sites strategically located to serve vulnerable populations (i.e. community or senior centers)
- Special public transport to and from application sites
- Home visits to conduct the interview for applicants with disabilities that make them otherwise unable to visit the application site
- Skype or similar technology to facilitate off-site interviews

FNS expects and encourages the State agency to consider the potential needs of disaster survivors with disabilities in their community and to include any special accommodations and alternative interview procedures as part of their D-SNAP plan and disaster-specific D-SNAP request.

#### Skype Interview

In 2013, the Colorado State agency connected applicants at an isolated local office with eligibility workers at the central D-SNAP application site using Skype, thereby providing access to the interview for households unable to access the application site due to flooding.

During the D-SNAP interview, the eligibility worker should ask about:

- Proof of Identity for head of household
  - Confirm names and birthdays of other household members
- Household composition as it existed the day the disaster struck
- Residency (or employment, if applicable) in the disaster area
- Income available/anticipated during the entire benefit period
  - Confirm places of employment for all working members of the household and record this information on the application
- Accessible liquid resources available at the start of the benefit period
- Impact of the disaster on the household
  - What adverse effects did the household suffer (i.e., flooding, wind damage, power outage)
  - How much did they pay (or do they anticipate paying during the benefit period) for these expenses?
  - How did they pay for these expenses? (only expenses paid out of pocket and not merely incurred, are countable)
  - Did they receive reimbursement for any of these expenses?

In the past, some States have struggled with conducting interviews for all applicants each day. States that anticipate large crowds should plan for sufficient staff and application sites large enough to accommodate the volume of applicants. Some States have found it helpful to advise applicants to come on a specified day, assigning days based on the first letter of last name, in order to disperse the crowds evenly across all days of the benefit period. However, any applicant coming to the site on a day other than the one assigned should still be interviewed and not told to return on the specified day.

In the past State agencies that were overwhelmed by the number of applicants have issued numbered tickets to applicants that cannot be interviewed on a given day so that they may return and be seen early the next day. This option should only be considered as a last resort and State agencies considering use of this tactic should consult with FNS prior to implementing this strategy. States considering issuing tickets should take care to:

- Create tickets that cannot be copied
- Associate ticket numbers with client names
- Ensure that people do not leave the site with copies of the D-SNAP application

States often distribute applications to people waiting in line in order to speed up the application process. Note that, if a completed application is submitted and the household is not able to be interviewed that same day, the date of submission, not the date of interview, is considered the application filing date. The State agency will use the filing date as the start of the 3-day period in which benefits must be issued if the household is determined eligible.

### Verification

Verification rules are eased during a disaster to reduce administrative burdens and to reflect the reality that households and eligibility workers may not have access to the usual verification sources. State eligibility staff should exercise reasonable judgment when evaluating the truthfulness of applicant statements. Figure xx details the D-SNAP verification requirements.

Public information campaigns should indicate that applicants are expected to bring all available verification documents, including those that are not required. In addition, FNS encourages the use of data matching systems, such as the income and eligibility verification system (IVES) and the Beneficiary and Earnings Data Exchange (BENDEX), whenever possible and recommends that States publicize their intent to verify information through data matches in order to deter and detect fraud. The data in the system will not be able to provide an updated picture of household circumstances post-disaster; however, the matches may assist in finding unreported sources of income and suspect cases could be referred to program integrity staff for further investigation.

Figure 13. Verification Requirements

| Applicant Information | Status                  | Suggested Ways to Verify  |
|-----------------------|-------------------------|---|
| Identity              | Mandatory for applicant | <ul style="list-style-type: none"> <li>Photo ID.</li> <li>Two documents that verify identity and residency.</li> <li>Signed affidavit from a collateral contact attesting to the identity of the applicant, where other sources of identity are not available.</li> </ul> |
| Residency             | Where possible          | <ul style="list-style-type: none"> <li>Utility bills, tax bills, insurance policies, driver's licenses, other ID with address, bills, or other documents that establish the</li> </ul>  |

|   |                 |  |
|---|-----------------|--|
|   |                 | applicant's home or work address.  |
| <b>Household composition</b>                                    | If questionable | <ul style="list-style-type: none"> <li>After taking the application, the eligibility worker can ask the applicant to orally list the names, ages, and birthdays of all household members.</li> </ul>   |
| <b>Loss or inaccessibility of liquid resources or of income</b> | Where possible  | <ul style="list-style-type: none"> <li>Obtain a list of banks/ATMs that were closed due to the disaster and compare with damage maps.</li> <li>Check with the State Banking Commission.</li> <li>Confirm that applicant's place of work was located within most seriously damaged area.</li> </ul> |
| <b>Food loss</b>  | If questionable | <ul style="list-style-type: none"> <li>Use maps or lists to verify that applicant lives within an area affected by power outage, flooding, evacuation, etc....</li> <li>Confirm with the power company.</li> </ul>   |

#### ✳ Questionable Information

Each disaster is different and in some disasters it will be easier for households to document and State agencies to verify information than in others. Eligibility staff should consider this in making an eligibility determination. In addition to the interview strategies noted above, States:

- **MUST** refer clients without required verification or with inconsistent information to onsite investigators or highly experienced staff/supervisors for review.
- **MAY** delay the issuance of benefits for up to 7 days from the date of application (instead of the normal 72 hours) to allow some verification or cross-checking for those with questionable applications. Delayed issuance should always occur when eligibility staff suspects fraud.

#### Data Entry & Certification

States may use their regular SNAP eligibility system or a separate D-SNAP system to certify applicants, provided that they can conduct the required duplicate checks with the system they select. Data on all household members for all applications (denied and approved) must be entered into the system. This may be done onsite to allow for

upfront certification. Alternatively, applications may be gathered at the site and delivered to another location, such as the local or central office, for data entry and processing.

#### ✳ Off-site Data Entry

States selecting this option should be prepared to deliver batches of applications several times per day, depending on volume, and must take into consideration data security and privacy concerns. The time delay associated with this method should also be taken into account as delays in data entry can result in delayed issuance and benefit access for households in need. Finally, the normal data entry cut off times built into the system may need to be amended to ensure that benefits are accessible to the client within 72 hours of application, except in questionable cases in which the State may delay benefit issuance for up to 7 days, as noted above.

#### ✳ Separation of Duties

Certification and issuance responsibilities must be separated in order to minimize the risk of employee fraud. Volunteers may not participate in any certification, interview, data entry, or issuance functions.

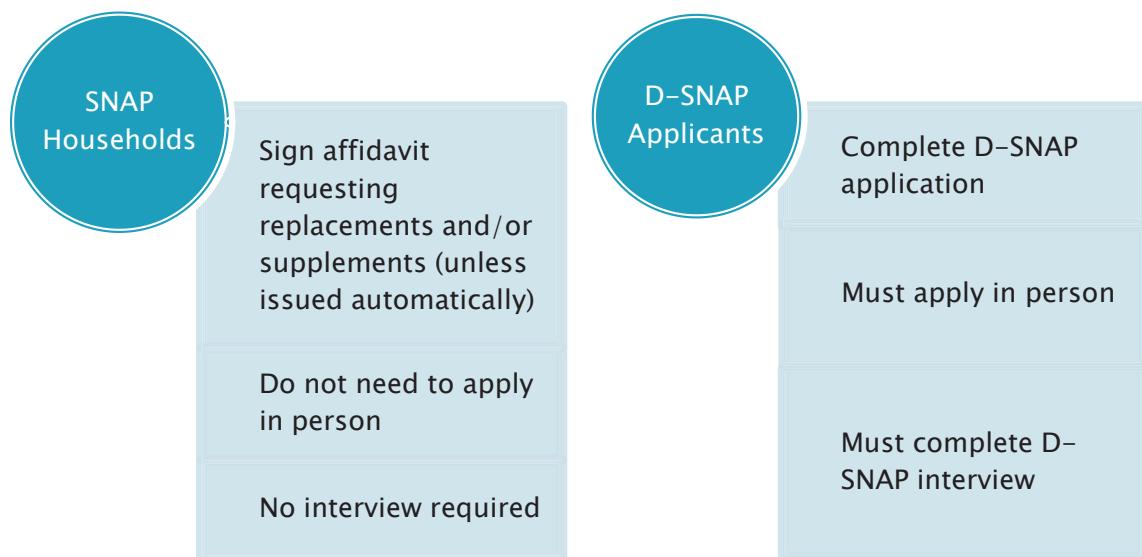
#### Assistance to Ongoing Households

If SNAP clients are being served at the same site as new D-SNAP applicants, there should be separate lines and workers designated to work with each group. Ongoing households do not need to complete a D-SNAP application; they only need to complete an affidavit of disaster loss (unless supplements/replacements are issued automatically). In addition, SNAP households' identities and circumstances are already known to the State agency, so they need not participate in a D-SNAP interview.

Even if supplements/replacements are issued automatically or if ongoing households are directed to their local offices to request disaster assistance, the D-SNAP site must be prepared to handle some regular SNAP clients who come seeking help. The site should have available affidavits of disaster loss <<link to template>> and a separate line to serve any ongoing clients.

The following chart details the differences in eligibility and applications requirements for new D-SNAP households and ongoing SNAP clients.

Figure 14. D-SNAP Applicants vs. SNAP Households



The options for providing disaster benefits to ongoing SNAP households are discussed in greater detail in Section 4.3. Specific operational considerations for each option can be found below.

#### ⌘ Automatic Supplements

- How will clients be notified?
- How will the system be programmed to issue the supplement?
- When will this occur?
  - FNS recommends issuing the supplemental benefit prior to the start of the D-SNAP application period, if possible, as ongoing clients are less likely to go to the site if they have already received their benefits.

#### ⌘ Individual Supplements

- How will clients be notified?
- How can clients request a supplemental issuance?
  - FNS encourages States to allow clients to call their local offices and request that an affidavit be mailed to them or to provide electronic forms for mailing or secure e-signature/submission.
  - States can also elect to accept affidavits in person at local offices and/or D-SNAP application sites.

- When will this occur?
  - Clients may only request supplements during the D-SNAP application period. If affidavits are being mailed, request must be made during application period and the State agency may determine a reasonable time period within which the affidavits can be returned or mailed to the office for processing.
  - Affidavits mailed to the local office must be postmarked by the last day of the application period.

#### ✳ Automatic/Mass Replacements

- How will clients be notified?
- What will the replacement percentage be?
  - In requesting automatic replacements, States must determine an appropriate percentage of the month's benefits to be replaced, depending on the timing of the disaster within the issuance cycle.
  - States should work closely with their Regional office and the Retailer Policy and Management Division to determine the replacement rate.
- How will the system be programmed to issue the replacement?
- When will this occur?
  - FNS recommends issuing the replacement benefit prior to the start of the D-SNAP application period, if possible, as ongoing clients are less likely to go to the site if they have already received their benefits.

#### ✳ Individual Replacements

- How will clients be notified if the timeframe for reporting has been extended?
- How can clients request a replacement benefit?
  - FNS encourages States to allow clients to call their local offices and request that an affidavit be mailed to them or to provide electronic forms for mailing or secure e-signature/submission.
  - States can also elect to accept affidavits in person at local offices and/or D-SNAP application sites. This decision may depend on the time period during which replacements may be requested as the period may have passed before D-SNAP operations begin.
- When will this occur?
  - Clients may request replacements:
    - During the ten day period following the loss, or,
    - Under the extended timeframe for requesting replacements if the State has been approved for a waiver of the reporting deadline.

## Special Cases

During D-SNAP operations, questions often arise about households with special circumstances. The following chart details the appropriate handling of these cases.

Figure 15. Households with Special Circumstances

| Household Circumstance  | D SNAP Eligibility   |
|---|--|
| Applied for but not yet receiving SNAP  | Eligible as a new D-SNAP applicant   |
| Received D-SNAP benefits for another disaster within the same benefit period                            | Not eligible for D-SNAP  |
| Ongoing SNAP households with mixed eligibility  | Individuals considered part of the SNAP household can receive a supplemental issuance; others can apply as new D-SNAP households         |
| Not income eligible for D-SNAP but eligible for SNAP under Broad-based Categorical Eligibility criteria | Not eligible for D-SNAP; State agency may provide application for regular SNAP and certify household for ongoing benefits as appropriate |
| Temporarily residing in a shelter   | Eligible for D-SNAP, if household is not expected to remain in the shelter for the entire benefit period                                 |
| Zero-benefit households   | Eligible as a new D-SNAP applicant   |

## Onsite Review

FNS requires that States provide for immediate, onsite supervisory review for denied applicants. Eligibility workers should notify applicants of the right to this review, and that it will not affect their right to a fair hearing. Denied cases must be inputted into the State's system in order to allow for duplicate checks and may not be reopened; clients whose circumstances have changed after they filed an application and were denied must reapply for the D-SNAP during the application period. Previously denied households that reapply must be referred to supervisory staff or investigators for review.

## 5.4 EBT issuance

By the time D-SNAP operations begin, States will have already selected their method of card issuance. During the application period, the State agency will need to maintain a sufficient supply of EBT cards to ensure that certified households are able to access

their benefits within 72 hours of application (except in cases of delayed issuance for questionable applications). Pre-existing plans for storing and distributing cards within the State may need to be adjusted based on actual applicant volume at various sites.

### Replacing Cards and Benefits for Ongoing Clients

Ongoing SNAP recipients may lose their EBT cards in a disaster, especially when they have to relocate quickly to avoid harm. The EBT disaster system design should incorporate procedures for ongoing cases to receive replacement cards as soon as possible. For example, if the normal EBT replacement process is to mail the replacement card to the recipient's home, and the disaster response requires card delivery to a disaster issuance site or alternative address in a non-disaster area, the State must be able to override the regular EBT system.

It is possible that SNAP and D-SNAP clients who have been issued replacement benefits for food lost in the disaster may subsequently lose that food in a second disaster or power outage. In both instances, the procedure for replacing these benefits is the same for any other issuance: in order for the State to replace the benefits, the client would need to file an affidavit of loss in a timely manner.

### Reconciliation

The State agency must develop a system for reconciling both cards and benefits. Cards shipped from a central location should be tracked until distributed locally to households. Each issuance site needs to maintain a beginning and ending inventory and track new cards received, total cards available, and cards issued. The method of distribution for cards – whether drop shipped, pulled from blank card stock, or mailed or delivered by some other means will most likely dictate the specific requirements for reporting and reconciliation. If the State assigns PINs, they must also account for PIN mailers or envelopes to ensure adequate security, except when the PIN is formulated from the Primary Account Number. The State must also reconcile the number of cards set-up with EBT accounts and the number of cards issued and then research and explain any discrepancies.

It is important that States track disaster benefits separately from ongoing benefit issuance. Some States have defined distinct disaster food benefit codes to allow them to track the disaster benefits on their EBT contractor's system, which eases benefit reconciliation each day. The EBT contractor has added separate disaster benefit lines to administrative screens to enable the States to track disaster benefit drawdown distinctly from ongoing benefits. States also must adhere to FNS reconciliation

guidelines so that they can compare benefits posted to accounts to benefits issued by the State eligibility system.

### Expungement

State agencies may request to use a shorter timeframe (typically 90 days) for expunging disaster benefits than for expunging regular SNAP benefits. Following the implementation of the Food and Nutrition Act of 2008, this waiver requires approval from FNS. State agencies that wish to implement this waiver must submit it along with their D-SNAP requests to their respective Regional Offices for transmittal to the Retailer Policy and Management Division. Any State operating under this waiver must inform D-SNAP households of the timeframe for expunging benefits. This waiver may only be used when the State has received an IA declaration and is operating a D-SNAP. System designers must work with the EBT contractor to develop a process for expunging disaster benefits from the EBT system. To do this, the State system must identify the disaster cases and benefits uniquely, which is required for FNS reporting, as well. The EBT provider should make a corresponding report to the State agency to identify the value of disaster benefits expunged.

## 5.5 Daily Reporting

A State operating a D-SNAP must submit a daily report to its FNS Regional Office. The RO will share this with the FNS National Office on the day it is received. Daily reports are used to monitor program progress, troubleshoot problem areas, inform FNS policy officials, and respond to inquiries from the media and other government agencies.

The State agency should begin submitting reports to their Regional Office on the day following the first day of D-SNAP operations and continue submitting the reports on a daily basis until all applications are processed. Reports must be submitted each day even if no or very few applications have been submitted.

FNS requires that all States utilize the daily reporting template found in the Toolkit for State Agencies. Data should be submitted by county, as indicated in the template. The reports must contain:

- Number of new households approved
- Number of ongoing households receiving supplements
- Number of new persons approved
- Number of ongoing persons approved for supplements
- Number of new households denied
- Value of new benefits approved

- Value of supplements approved
- Average benefit per new household
- Average benefit per ongoing household

States may use the daily reporting sheet to track replacement benefits as well; however, replacements are not considered disaster benefits and need not be reported on the daily DSNAP reports as they are to be reported separately after the D-SNAP. See [Certification Reporting Post-D-SNAP](#) for more information, including form FNS-388 which should include replacement issuance.

In addition to the quantitative data, the inclusion of any qualitative information with the daily reports will help keep State and Federal policymakers up to date on the situation on the ground. FNS encourages State agencies to submit these anecdotal observations, along with any questions or concerns, to their respective Regional Office throughout the application period.

## 5.6 Fraud Prevention

Effective fraud prevention strategies must begin in the pre-planning phase. In the wake of a disaster, the focus is often on how to get benefits to survivors as soon as possible. Agencies must find a balance between responding quickly and encouraging participation and protecting program integrity.

State agencies should work with investigative staff from the start of the disaster response to ensure that program integrity issues are addressed proactively. Focusing on integrity during all phases of the disaster response will also minimize the likelihood that problems will need to be addressed through audits. Thorough training of all staff and supervisors on D-SNAP policy and fraud prevention strategies will also aid in this effort.

### Application/Issuance Site Controls

An important aspect of fraud prevention is appropriate internal controls. In order to ensure that only eligible households receive benefits and that the amount of benefits issued is accurate, States operating a D-SNAP must:

- Input information for all household members into the eligibility determination system to prevent individuals from obtaining benefits as a member of more than one household.
- Input denied applications into the eligibility determination system each day, so that households that are denied and later reapply are detected and referred to

fraud prevention staff. Note that such households may be eligible if their circumstances have changed.

- Check for duplicate participation using onsite or offsite computer databases or hardcopy participant lists. Update computer database or hardcopy participant lists every day.
- Refer clients without required verification or with inconsistent information to onsite investigators or highly-experienced staff for review.

In addition, State agencies may:

- Confirm household composition by asking applicants at the start of the screening interview for names and dates of births for all household members and then requesting they repeat the information later.
- Delay issuance of benefits for up to 7 days from the date of application to allow some verification and/or cross-checking, either for all applicants, or for those with questionable applications.
- Request that households bring verification of non-required items (household composition, residency, income/resources, and food loss) provided that applicants are not denied based solely on the unavailability of verification.

### Information for Applicants

The more information applicants have about eligibility and verification requirements, the less likely they are to inadvertently provide erroneous information. States should distribute fliers or play recorded messages at sites (in appropriate languages) with:

- Program requirements
- Administrative, criminal, and civil penalties for fraud
- Notice that anti-fraud measures are in place
- Review procedures, including 100% review of employee cases and requirements to repay any overissuance
- Results of completed investigations and/or arrests for fraud
- Any existing State hotline number, website, or email address for reporting applicant or recipient fraud
- Information on what cannot be purchased with SNAP benefits

### Prevent Employee Fraud

FNS recognizes that, in many cases, State agency employees are among the disaster survivors and some may be legitimately eligible for D-SNAP benefits. States should take care to balance encouragement of eligible employees to apply for program benefits with the real risk that some close to the program may take advantage of their

access to fraudulently apply for or issue benefits. FNS requires that State agencies take these special measures to prevent employee fraud:

- Use separation of duties for certification and issuance.
- Include a question on the D-SNAP application asking if anyone in the household is employed by the State or State SNAP agency.
- Utilize supervisors or investigators to conduct employee certification interviews
- Audit all approved State agency employee applications and publicize that policy. FNS expects the State agency to review all approved applications from its employees and to communicate that to employees up front.

States can also exercise additional methods of preventing employee fraud, including:

- Auditing applications from all State and/or County employees, not just those employed by the State SNAP agency.
- Auditing all applications from volunteers and others onsite, such as local police.
- Auditing denied applications from State agency employees.
- Conducting a wage match for all State/County employees prior to issuing benefits, if possible, or as part of the post-disaster review process.
- Maintaining updated inventory of office equipment/supplies and comparing the original list with what is present at close-out.

### **Monitoring and Reporting**

FNS Regional Office and State agency staff should monitor all fraud prevention efforts throughout the application period. Specific fraud concerns (i.e., a household that applied at two different sites) should be flagged and shared among all application sites and staff. Program integrity procedures should be modified as needed during D-SNAP operations. Ongoing fraud issues, particularly those concerning employees, should be promptly reported to FNS, so that we may provide oversight and guidance in dealing with the issues.

### **5.7 Changes to the D-SNAP**

As discussed in [Post-Approval](#), a State may request waivers subsequent to the initial approval which modify, extend, or expand the D-SNAP. Changes that occur during the application period can present special operational challenges. Public information materials must be amended so that potential applicants are aware of the changes. The opening of additional application sites may be taxing for employees that are already working overtime in unfamiliar environments. States considering changes to their programs should carefully evaluate the availability of resources, including staff, funding, and application sites, before making a request.

FNS also encourages States to gauge the presence of ongoing need in the area(s) being considered for potential expansion or extension as extending the application period or expanding into areas not as heavily damaged may not result in more eligible households being served. Experience has shown that families most in need of benefits will often come during the early days of the application period and counties receiving an IA declaration at a later date may not have been impacted as much as those declared first. In addition, if a disaster declaration is not issued until several weeks or months after the disaster struck, households still in need of food assistance may be better served by regular SNAP.

Any request for an amendment to the initial D-SNAP approval must contain an explanation and supporting documentation for the desired change. Requests for extension must be submitted prior to the expiration of the initial application period, with sufficient time for FNS to consider and respond to the request before the application period closes.

## Part 6. Post D-SNAP

This part of the guidance handbook covers a State's activities after program operations cease. After the D-SNAP application period ends, the State has several responsibilities to conclude the D-SNAP.

These include:

- Closing out the D-SNAP application/issuance sites
- Transitioning to regular SNAP
- Certification reporting
- Issuance reporting and reconciliation
- Fair hearings, claims and restored benefits
- Post-disaster review and after-action report

### 6.1. Closing Out the Application/Issuance Site

Staff should follow their State agency protocols in closing down D-SNAP sites. The check list below is designed to facilitate these efforts.

Figure 16. Close Out Checklist

| Check                               | Subject          | Suggestions  |
|-------------------------------------|------------------|--|
| <input type="checkbox"/>            | Files            | <ul style="list-style-type: none"> <li>• Organize applicant files using State's standard practices</li> <li>• Include issuance documents in files</li> <li>• Review files to determine duplication</li> <li>• Determine length to retain files – Federal standard is minimum of 3 years</li> <li>• Put files in boxes marked with site and box number</li> </ul> |
| <input checked="" type="checkbox"/> | Issuance Records | <ul style="list-style-type: none"> <li>• Reconcile issuance at all sites</li> <li>• Put issuance logs and records in boxes marked with site and box number</li> <li>• Forward to State office</li> </ul>   |
| <input type="checkbox"/>            | EBT Cards        | <ul style="list-style-type: none"> <li>• Take inventory of EBT cards</li> <li>• Return EBT cards to secure storage site</li> </ul>   |
| <input checked="" type="checkbox"/> | Equipment        | <ul style="list-style-type: none"> <li>• Take inventory of all equipment (computers, copiers, FAX machines, telephones) and other supplies, and compare with initial inventory</li> </ul>  |

- Return equipment to lender, as appropriate

|                          |          |   |
|--------------------------|----------|---|
| <input type="checkbox"/> | Staff    | <ul style="list-style-type: none"><li>• Complete time sheets for all personnel, including temporary personnel. Records are subject to 3 year retention.</li></ul> |
| <input type="checkbox"/> | Building | <ul style="list-style-type: none"><li>• Clean as much as possible</li><li>• Maintain security until site is emptied</li></ul>                                     |

## 6.2. Certification Reporting Post-D-SNAP

Since funding is obligated once benefits are posted to the EBT system, State agencies will have estimated the amount of benefits to be issued and will have provided this estimate to the FNS Regional Office financial management staff to ensure that funding ceilings are not exceeded. States are responsible for compiling and transmitting the following post-disaster reports in a timely manner.

### FNS-292B

Within 45 days of the termination of a D-SNAP operation, the State agency must submit its final disaster figures on the FNS-292B Report of Supplemental Nutrition Assistance Program Benefit Issuance for Disaster Relief. All reports should be submitted electronically in the Food Programs Reporting System (FPRS).

#### Need Help with Reporting?

FNS can help. State agencies should work closely with FNS Regional Offices to ensure proper reporting.

The FNS-292B must contain the following issuance data for D-SNAP operations:

- *Number of Households* – new households issued D-SNAP benefits
- *Total Number of Persons Assisted* – new persons issued D-SNAP benefits
- *Number of Certified Persons* – ongoing households issued supplements
- *Value of Benefits Issued* – total of benefits issued to new households and supplements issued to ongoing households.

The FNS-292B report should *not* include the value of any replacements issued, as they are not considered a disaster benefit. States should report the value of replacements on the FNS 388 Monthly Issuance Report.

**FNS-388**

The Monthly Issuance Report (FNS-388) shall reflect disaster issuance and participation figures, including replacement benefits. Beginning October 1, 2014, States will be required to complete the revised FNS-388, which will include detailed issuance and participation figures for new D-SNAP households and ongoing SNAP households receiving disaster supplements and/or replacement benefits.

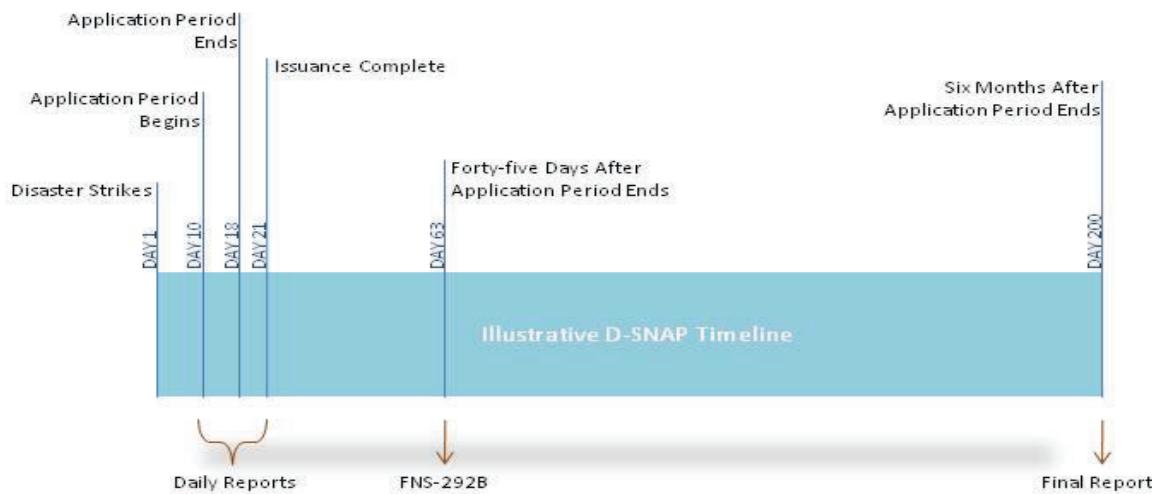
**FNS-209**

In the Remarks section of the Status of Claims Against Households Report (FNS-209), State agencies should indicate the number of claims established and collected against D-SNAP benefits. These numbers must also be included in newly established claims (line 4) and collection summary (lines 14, 16 and 18(a)). D-SNAP claims must be identified on backup documentation in accounting systems for the FNS-209.

**FNS-46**

States should explain in the Remarks Section of the Issuance Reconciliation Report (FNS-46) what portion of the D-SNAP was reported in the Gross, Returns, and Net Issuance. Beginning October 1, 2014, States will be required to complete the revised FNS-46, which will include detailed issuance and participation figures for new D-SNAP households and ongoing SNAP households receiving disaster supplements and/or replacements. The FNS-46 and FNS-388 should reconcile with the reported Net Issuance.

Figure 17. Timeline for D-SNAP Reporting



### 6.3. Issuance Reporting and Reconciliation

The State also must address reporting and reconciliation areas unique to EBT systems including card production and delivery, benefit authorization, and posting.

#### Card production and delivery reconciliation

Cards shipped from a central location need to be tracked until distributed to households. Each issuance site needs to maintain a beginning and ending inventory and track new cards received, total cards available, and cards issued. Some households may already have a card (active from a prior period of participation), which they may continue to use for their new disaster benefit. State agencies must track benefits issued on existing cards in order to prevent confusion over differences in the number of households approved and number of new cards issued.

The method of distribution for cards – whether drop shipped, pulled from blank card stock, or mailed or delivered by some other means will most likely dictate the specific requirements for reporting and reconciliation. If the State assigns PINs, they must also account for PIN mailers or envelopes to ensure adequate security, except when the PIN is formulated from the Primary Account Number (PAN). Several State agencies have used drop ship manifests and found the need to alphabetize and sort them by location, either prior to delivery or at the delivery site. This method requires additional labor, which the State should consider when planning staffing and logistics for a disaster site operation. The State also should reconcile the number of cards set-up with EBT accounts and the number of cards issued and then research and explain any discrepancies. For example, if a site that entered and activated 200 cards in a day and issued 220 cards that day, the State must explain the discrepancy.

States may be able to minimize costs for system modifications by defining these needs during initial system interface and reporting design. Toward the end of the disaster operation, each State should examine their existing EBT reporting and reconciliation systems to determine whether modifications are necessary to prepare for the next disaster.

#### Benefit authorization and posting reconciliation

States must track disaster benefits separately from ongoing benefit issuance. Some States (e.g., Florida, South Carolina, and Louisiana) have defined distinct disaster food benefit codes to allow them to track the disaster benefits on their contractor's system,

which eases benefit reconciliation each day. The EBT contractor has added separate disaster benefit lines to administrative screens to enable the States to track disaster benefit drawdown distinctly from ongoing benefits. States must also have a method in place to allow for tracking of multiple D-SNAPs simultaneously, in the event the State is struck by two disasters within a short timeframe. States also must adhere to FNS reconciliation guidelines so that they can compare benefits posted to accounts to benefits issued by the State eligibility system.

#### **Benefit expungement**

To reduce costs and encourage households to use their benefits promptly, several State agencies have sought to expunge any unused D-SNAP benefits after a period of 60 or 90 days. FNS must approve any expungement period less than 12 months. System designers need to work with the EBT contractor to develop a process for expunging disaster benefits from the EBT system. The EBT provider should make a corresponding report to the State agency to identify the value of disaster benefits expunged.

#### **Ensure complete reporting to FNS of disaster benefits issued**

Since funding is obligated once benefits are posted to the EBT system, State agencies will have estimated the amount of benefits to be issued and will have provided this estimate to the FNS Regional Office financial management staff to ensure that funding ceilings are not exceeded. This needs to be updated periodically.

### **6.4. Fair Hearings, Claims and Restored Benefits**

After D-SNAP operations have concluded, States will still have to resolve any issues associated with fair hearings, claims and restored benefits.

#### **Fair Hearings**

The requirement to conduct onsite supervisory reviews of denied applications should help to minimize the number of fair hearings requested. Even so, hearing proceedings may be ongoing for several months after the application period has ended.

#### **\* Who May Request**

Any household who applied for D-SNAP benefits and was denied benefits may request a fair hearing. A household that disputes the household size used in calculating its benefit amount may also request a hearing.

#### ✳ Who May Not Request

Households who did not apply for D-SNAP benefits do not have a right to a fair hearing. This includes households who were unaware of the D-SNAP or who were not able to reach the site during the application period.

#### ✳ Supervisory Review

A household which has requested a fair hearing is entitled to an immediate onsite supervisory review. Households not satisfied with the outcome of this review retain the right to request a fair hearing through the normal process.

#### ✳ Withdrawal of Request

If a household wants to withdraw its request for a fair hearing, it may do so in writing.

#### ✳ Fair Hearing Reporting

The number of fair hearings is reported on the FNS-366B, Program Activity Statement.

### Claims

In general, States should follow their FNS-approved procedures for establishing claims.

#### ✳ Pre-establishment Cost Effectiveness Determination

State agencies have the option to follow the established claims threshold of \$125 set forth in Section 273.18 (e)(2)(ii) of SNAP regulations or to establish a D-SNAP cost effectiveness threshold amount for establishing D-SNAP claims. States must indicate their chosen option in their D-SNAP plans and include this amount in their D-SNAP plan for approval by the Regional office. If the State agency does not establish its own D-SNAP cost-effectiveness threshold, it may follow the FNS threshold of \$125 set forth in Section 273.18 (e)(2)(ii) of SNAP regulations and include this amount in its D-SNAP plan.

#### ✳ When to Establish Claims

If a household receives D-SNAP benefits to which it was not entitled, the State agency must establish a claim against the household consistent with the claims collection requirements of SNAP regulations. However, if a claim is established against a household for an overpayment of SNAP benefits, this amount may not be collected from the D-SNAP allotment.

The State agency shall establish claims and issue repayment demand letters for over-issuances which are the result of:

- Intentional Program Violations (IPVs)
- Inadvertent household errors
- Agency errors

### Restored Benefits

SNAP regulations require State agencies to issue restored benefits to households when benefits were lost:

- Due to an agency error
- When a denial of benefits is subsequently reversed

This requirement also applies to D-SNAP benefits; State agencies should follow their normal procedures for issuance in such cases. The accountability system must clearly indicate that an issuance was a restored benefit.

## 6.5. Post-Disaster Review Report

The State agency must conduct a comprehensive review of general program performance and reviews of individual cases along with a problem analysis on the review findings. The State will then incorporate these findings, lessons learned, best practices, and proposed improvements to the State's systems, operational procedures, and D-SNAP plan into its Post-Disaster Review Report. Reports should be transmitted to their respective FNS Regional Offices who will review reports and submit them to the National Office D-SNAP Team.

Note that D-SNAP applications are not subject to Quality Control review and are not included when determining SNAP timeliness and payment accuracy rates.

### Post-disaster Report

The post-disaster review report is comprised of four parts: comprehensive review, individual reviews, problem analysis, and proposed improvements. State agencies shall compile and submit to their FNS Regional Office their completed reports no later than 6 months after the close of program operations. D-SNAP approvals will include the due date for the final report. ROs are responsible for working with their respective States to ensure the timely completion of the reviews, analysis, and submission of the report. Upon receipt from the State Agency, the RO will review reports to ensure all

required elements are included and will transmit them to the National Office D-SNAP team.

### ***Comprehensive Review***

The comprehensive review should begin with an overview of the D-SNAP operation, including where and when it took place, how it was staffed, and the total number of applications approved and amount of benefits issued. The State should then describe the systems or methods employed, document any major problems encountered, and discuss the interventions used to solve those problems in the following areas:

- Certification systems
- Fraud control
- Issuance
- Public information and outreach
- Program access issues (e.g. persons with disabilities, the elderly, and other vulnerable populations)
- Security

### ***Individual Reviews***

The individual reviews include both a sample of new public cases and a review of all approved State agency employee cases.

#### ***⌘ Public Case Reviews***

States must review a random sample of 0.5 percent of new D-SNAP cases, up to a maximum of 500 cases with a minimum sample size of 25 cases. The sample should include both approved and denied cases. Ongoing SNAP households that received supplemental benefits should not be included in this sample nor should State agency employee cases. Although State agencies may wish to consult with an FNS statistician when devising a sampling plan, FNS does not require that they do so.

#### ***⌘ Employee Case Reviews***

In addition to the review of public cases, States must review 100 percent of all approved State agency employee applications and may, at its option, also review denied applications from State agency employees. In addition to determining if the appropriate action was taken on the employee cases, the State should verify that the application was handled appropriately, by a supervisor or onsite investigator, as detailed in the State's D-SNAP plan. FNS encourages States to review applications of other State employees not employed by the State SNAP agency, particularly if they were involved in work at D-SNAP sites.

For both reviews, no cases may be dropped for any reason. The State agency must report information gathered even from incomplete case reviews. FNS does not require State agencies to alter their sample size if a large number of case reviews are incomplete; however, States are encouraged to do so in order to draw meaningful conclusions from the findings.

The required components of the individual review – case record review, verification, and interview – are detailed below.

❖ **Case Record Review**

- States should review the household's application for problems (such as missing or inconsistent information, no identification provided, lack of signature, etc.) and re-determine eligibility using the information given. Additionally, the review should note any information the household has given about their place(s) of employment at the time of the disaster, which is helpful for both seeking verification of income and for locating the client for their interview. States should note that at the time of application, caseworkers should ask clients about their place of employment at the time of the disaster and record that information on the application.

❖ **Verification:**

- States should focus the review of verification on identifying clients who failed to accurately report information known to them about their circumstances, such as residency, food loss, income sources, or loss of work. States should not focus on clients who could not accurately project their circumstances for the disaster benefit period.
- **Residency:** The State should verify that the client lived (or worked, if applicable) in the disaster area defined for that D-SNAP. Residency can be verified by comparing the client's stated address to maps or lists compiled for use by workers during the operation of the D-SNAP. In most cases, the State agency would not need to request additional verification of residency from the household.
- **Food Loss.** If the State agency allowed food loss as a sole qualifier for D-SNAP eligibility, the State should confirm that the household resided in a

geographical area that experienced extended power outages of the length designated in the D-SNAP approval, flooding, or was otherwise affected by the disaster in a way that would be expected to lead to food loss. Verification can be achieved by comparing the client's stated address to maps of power outages, flooding, etc. In most cases, the State agency would not need to request additional verification of food loss from the household.

- **Income.** Verification of income is intended to hold households accountable for accurately reporting sources of income or loss of work that were *known* to them at the time of the disaster. It is not intended to penalize households for not being able to accurately predict their income/employment during the benefit period.
  - To help in detecting unreported sources of income, States should perform data matching, which should include wage matching, income and eligibility verification systems (IEVS) matching, for each case selected for review, Beneficiary & Earnings Data Exchange (BENDEX) matching, and any other matching the State agency normally uses to ensure that all known income sources were disclosed. These sources may help in locating employers that can be interviewed about the client's employment status and income at the time of the disaster. In addition, any information found through the matches that conflicts with the information provided on the application should be discussed with the household during its interview.
  - If the wage match shows that the client was employed in the months prior to the disaster and the client did not report this income, the State agency should contact that last known employer and inquire as to whether the client was employed there at the time of the disaster. If the client was employed there at the time of the disaster, the reviewer should inquire as to whether, at the time of application, it was reasonable for the client to expect their income to be interrupted due to the disaster. If the employer states that the client should have had *no* reason to believe that their income should have been interrupted due to the disaster, the reviewer should explore the client's rationale for reporting an

expected interruption in income during the client interview. If it appears that the client gave their best prediction of their circumstances, then the reviewer should accept the household's statement of income. If the client was not employed at that business at the time of the disaster or the employer refuses to cooperate with the reviewer, and attempts to contact the household have been unsuccessful, the State can discontinue attempts to verify the client's income.

- If a BENDEX match finds undisclosed unearned income during the benefit period, the State agency should explore with the client during their interview why they believed that income would be unavailable during the benefit period. Past experience has shown that government benefits generally remain available post-disaster; accordingly, there would have to be very unusual circumstances present to support a household's failure to report income from these sources. However, unearned income from private sources, such as alimony, direct child support and contributions, could be delayed or unavailable if the individual responsible for contributing these funds was also impacted by the disaster. If it appears that the household gave its best prediction of their circumstances, then the reviewer should accept the household's statement of income.
- ***Disaster-related Expenses.*** States should attempt to verify disaster-related expenses through discussion with the household during the interview. The reviewer should ask what expenses the household incurred and confirm that they are consistent with what the household reported at the time of application. The State review should also ensure that the types of expenses claimed are appropriate. For example, if the State agency is aware that the household lives in a rental unit, claims for roof or window repair expenses would not be consistent with this type of living situation and should be further explored.

#### ❖ Client Interview

- The purposes of the interview are to review the client's statements on their D-SNAP application, to explore any inconsistencies found through data matching or other sources, and to gather the client's reflections on the quality of the D-SNAP service they received. States have the option of

conducting either telephone or face-to-face interviews for all or any clients.

- States must make reasonable attempts to contact households and schedule the interview, using the resources available to them in the normal course of business, such as employers, internet searches, data brokering services, credit reporting services, etc. States may conduct the interview at the same time as a scheduled certification interview for SNAP, if the household is now participating in the regular program. If the client cannot be reached or does not attend the interview, the State should continue to review the case and report the results.

### ***Problem Analysis***

After completing the individual reviews, the State agency shall conduct a problem analysis, and create a separate list or chart for both the general public cases and the State agency employee reviews. Each list should be further broken down by D-SNAP project area (generally the County) and should include:

- Number of cases with problems
- Nature of the problem
  - Missing documentation in case file
  - Household error
  - State agency error
  - Intentional Program Violation
- Number of incomplete case reviews due to inability to locate the client or client failure to cooperate
- Number of cases in which recipient claims were established
- Value of claims
- Value of restored benefits
- Any further action taken against State agency employees as a result of findings

### ***Proposed Changes***

After conducting the reviews and problem analysis, State agencies should evaluate the relative success of their D-SNAP implementation. This section of the report should contain:

- "Lessons learned" and best practices from the D-SNAP
- Specific additions/changes to the State's disaster plan
- Recommended changes to internal policies

- Recommended additions or changes to this guidance handbook

FNS Regional Offices should take particular note of this section and work with the State agency to incorporate any proposed changes into its next annual D-SNAP plan.

## 6.6. Conclusion

This guidance was designed with the needs of State agencies and Regional Offices in mind. Lessons learned on the ground in past disasters have informed the policies and procedures in this handbook. FNS intends this to serve as a tool for planning and implementing successful D-SNAPs that quickly and effectively bring much-needed food assistance to disaster survivors. FNS welcomes your insight on any of the topics highlighted in this document and invites States to submit any recommended changes to this document to their Regional Offices. Future additions will incorporate changes and updates based on lessons learned and best practices.