



Food and
Nutrition
Service

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Center

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DATE: **JUN 10 2019**

SUBJECT: D-SNAP State Workgroup Recommendations

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

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Supplemental Nutrition Assistance Program

In Fiscal Years 2017 and 2018, the Food and Nutrition Service (FNS) served nearly 6 million households through the Disaster Supplemental Nutrition Assistance Program (D-SNAP). As disaster responses have grown in size and scale in recent years, it is essential that FNS proactively review the D-SNAP Guidance to ensure program integrity remains high while also safeguarding the opportunity to participate for income eligible households.

To complete that review, the FNS Southwest Regional Office convened a State Workgroup comprised of seven State agencies with recent disaster experience to discuss concerns and best practices regarding D-SNAP implementation, program integrity, and program access. State representatives from across the country met with FNS leadership to review current statutes, regulatory provisions, and policy guidance concerning D-SNAP, and to provide recommendations to FNS on how to improve the program at State and Federal levels.

I am pleased to share the attached memo which details the State Workgroup's recommendations to FNS and provides FNS' responses. A majority of States participating in the working group agreed to each recommendation while not all recommendations were unanimously supported.

Some of these recommendations require revisions to the existing D-SNAP Guidance, which is designed to provide flexibility to State agencies as they administer critical nutrition assistance to households impacted by disasters. FNS will notify State agencies when those revisions have been completed and disseminate any supplemental materials to support the revised Guidance at that time. In the interim, State agencies should use this memo in conjunction with the existing D-SNAP Guidance as reference when planning and implementing D-SNAP operations.

Please distribute this to your State agencies and advise them to contact their FNS Regional Office with questions. FNS Regional Offices should contact Lizbeth Silbermann at (703) 305-2494 any questions concerning this memorandum.

D-SNAP State Workgroup Recommendations

Current Disaster Supplemental Nutrition Assistance Program (D-SNAP) Guidance is designed to allow flexibility by the State agency to provide nutrition assistance to income eligible households impacted by disaster; however, with increased disaster response activities, it is essential that the Food and Nutrition Service (FNS) continues to be proactive in reviewing D-SNAP to strengthen program integrity while ensuring all eligible persons have an opportunity to participate. The increased complexity of disaster responses, size of the populations impacted, resources needed to implement an efficient response are all factors to consider when issuing implementing guidance. During Fiscal Years (FY) 2017 and 2018, FNS served nearly 6 million households through D-SNAP.

In May 2018, the FNS Southwest Region convened a meeting of States with recent disaster experience to discuss concerns, interests, and best practices with regards to D-SNAP implementation, program integrity and access. Representatives from California, Florida, Louisiana, Mississippi, New York, Texas, and West Virginia participated with FNS National Office, FNS Southwest Regional Office, and U.S. Department of Agriculture Office of General Counsel. The workgroup met to review current statutes, regulatory provisions and policy guidance concerning D-SNAP in order to provide recommendations to FNS on how to improve D-SNAP operations at the State and Federal levels. During the two-day meeting, the Southwest Regional Administrator facilitated the discussion on various D-SNAP topics including: scope of disaster operations, State readiness assessments, pre-registration, service delivery to special populations, benefit issuance, D-SNAP operation timeframes, and training needs.

What follows is a list of recommendations from the States and FNS's response to those suggestions:

Short-Term Solutions

Verification of Identity

States recommended that FNS revise the D-SNAP Guidance on verifying identity to the following tiered requirements:

1. A government issued photo ID;
2. Identity verified through an electronic verification process; or
3. Signed affidavit from a collateral contact attesting to the identity of the applicant. The collateral contact must provide a government issued photo ID.

FNS Response

FNS will revise the D-SNAP Guidance to include the tiered verification requirements giving State agencies the authority to require a government issued photo ID as the primary verification method.

Needs Assessment

States recommended that FNS require State agencies to provide both a presidential disaster declaration for Individual Assistance and a needs assessment to show the disaster's impact prior to approving a D-SNAP request. States also recommended that the operations be targeted based on the needs assessment.

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The needs assessment could include a combination of the following:

- Onsite Federal/State team assessments
- Utility company information
- Flood maps
- FEMA assessments
- Other pertinent information

FNS Response

FNS will revise the D-SNAP Guidance to clarify that State agencies must submit a needs assessment of the damage caused by the disaster prior to approval. The revisions will also specify that State agencies must target their D-SNAP response based on the needs assessment.

Issuance of D-SNAP Benefits

States recommended that FNS provide one month of D-SNAP benefits initially with an option for State agencies to request an additional month of benefits with a continued demonstrated need.

FNS Response

FNS will revise the D-SNAP Guidance accordingly to make it clear that FNS will no longer approve two months of benefits initially.

Joint Federal State Meeting on D-SNAP Technology

States recommended that FNS host a joint State and Federal meeting to discuss available technology solutions to streamline D-SNAP operations.

FNS Response

FNS Regional Offices will work to create a meeting to discuss advances in technology that will help State agencies more efficiently serve households impacted by disasters.

Training on D-SNAP

States requested that FNS provide additional trainings or webinars that provide an overview of D-SNAP operations to partners. This effort should also include talking points for State agencies.

FNS Response

FNS will develop webinars, trainings, and talking points for State agencies and post them on the FNS website.

Long-Term Activities

Social Security Numbers

States recommended that State agencies be permitted to require households who apply for D-SNAP to provide social security numbers (SSN) to protect the integrity of the program and prevent duplicate participation. Current D-SNAP Guidance does not require D-SNAP applicants to provide their SSNs to receive benefits because damage from the disaster could destroy the household's records.

FNS Response

As Section 7 of the Privacy Act of 1974 (5 U.S.C. § 552a note (Disclosure of Social Security Number)) makes it unlawful for a State agency to deny a benefit to an individual who refuses to disclose his/her SSN, FNS cannot accommodate the States' recommendation without a legislative change. However, it is permissible for a State agency to continue to request the voluntary disclosure of SSNs for integrity purposes pursuant to the current D-SNAP Guidance, as long as the State agency fully discloses the use that it intends to make of the SSNs to the applicants.

Food Loss Alone Standard Disaster Deduction Expense

FNS currently issues a disaster standard expense deduction (DSED) annually that allows State agencies to use a standardized amount to deduct disaster-related expenses. The DSED may only be used for operations that do not permit food loss alone as a qualifying factor for D-SNAP. State agencies recommended that FNS establish a standard disaster expense deduction to include D-SNAP operations that permit households that experience food loss alone.

FNS Response

FNS will investigate the efficacy of establishing such a standardized deduction and determine whether FNS has access to sufficient data to calculate the deduction.

Telephone Interviews

In order to increase efficiency in D-SNAP operations, States recommended that FNS provide State agencies with the option to conduct telephone interviews in lieu of face-to face interviews in D-SNAP.

FNS Response

FNS is interested in testing and exploring the efficacy of using telephone interviews in D-SNAP and allowed Florida to conduct a small-scale pilot as part of D-SNAP operations in FY 2018. After careful review of Florida's pilot evaluation data, FNS will determine whether additional pilot testing is required prior to allowing broader use of telephone interviews in D-SNAP.