



Food and
Nutrition
Service

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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Disaster SNAP (D-SNAP) Use of Virtual D-SNAP Operations Reminders and Updates

TO: All SNAP State Agencies
All Regions

Historically, State agencies operate Disaster Supplemental Nutrition Assistance Programs (D-SNAPs) via an in-person application and interview process. Since the onset of the COVID-19 pandemic, State agencies have faced unprecedented challenges to protect the health and safety of households and staff while responding to more frequent natural disasters. The Food and Nutrition Service (FNS) has approved D-SNAPs with virtual components to support States with these challenges.

This memo reiterates and extends [the guidance](#), “Use of Virtual Disaster SNAP (D-SNAP) Operations in Remainder of Fiscal Year (FY) 2021 and FY 2022,” issued on August 2, 2021. This memo provides lessons learned and best practices for D-SNAP operations with virtual components.

Virtual D-SNAP Overview

Since March 2020, FNS has approved 23 D-SNAP operations with virtual components. FNS understands that States are still dealing with challenges due to the COVID-19 pandemic and will continue to evaluate requests to use virtual components in D-SNAP operations in accordance with previous guidance. FNS may continue to approve D-SNAP operations with virtual components through the end of FY 23. FNS reminds States that D-SNAPs with virtual components are still considered novel and will be considered on a case-by-case basis. FNS does not plan to provide general authorization for virtual operations in annual D-SNAP plans due to the current lack of data to evaluate the impact of these models.

Virtual D-SNAP Considerations

Before requesting a virtual D-SNAP operation, States should consider the following questions to determine if they have the technological capacity to run a successful virtual operation:

- Can the State comply with virtual D-SNAP reporting requirements in addition to the standard D-SNAP reporting requirements? States are, at a minimum, expected to provide FNS with data on average wait time for an interview, number of calls answered, number of calls abandoned, average call completion time, number of complaints regarding interview completion, number of fair hearing requests for telephonic interviews, and information regarding card issuance, such as number of cards distributed at each site, number of cards mailed, and number of cards returned via mail. Such reports help FNS ensure virtual operations are not inhibiting access to D-SNAP.
- Does the State have remote or contact-free identity verification capabilities? States must have a way to verify identity of applicants that protects personally identifiable information (PII).
- Does the State have a system to accept pre-registration forms?
- Does the State have a call center or call center software? Can the State capture telephonic signatures?
- How will the State meet the needs of vulnerable populations that are unable to apply online or by phone?
- Does the State have an EBT issuance plan to deliver cards within 72-hours of approval? Can the State ship EBT cards to approved households overnight?

Virtual D-SNAP Best Practices

FNS has not prescribed a specific model for virtual D-SNAP operations but has determined that the following best practices may improve efficiency and program access:

Use of an online pre-registration system. An online pre-registration system allows potential applicants to submit household information to the State prior to an interview. Pre-registration systems allow States to obtain the information needed for a D-SNAP application and may even include an online portal that allows households to securely upload required verification.

States utilizing a pre-registration system must ensure users understand that the pre-registration form does not constitute an application. In a virtual or in-person operation, the information contained in the pre-registration constitutes an application once the household completes an interview with a merit State worker during the approved application period. This process allows the State to open its pre-registration period prior to the application period to identify the potential needs for the operations and to better predict the number of expected applicants. Pre-registration systems are expected to meet the same requirements as online SNAP applications, meaning States cannot require all fields to be filled out. Applicants must be able to submit pre-registration forms with name, address, and signature only. State agencies must provide other application methods, such as paper application or phone.

Ideally, information from the online pre-registration system should be auto populated into the State agencies eligibility system. Some advantages of using an online pre-registration system are:

- Streamlines processes and procedures which could reduce the amount of time required for an interview. This benefits households and State staff.
- Helps the State estimate the number of potential applicants if the pre-registration period is open prior to the application period to ensure appropriate staffing levels.
- Shortens the amount of time it takes to process paper D-SNAP applications since the information submitted by the household can be transferred to the eligibility system or processed in the pre-registration system.
- Reduces data input errors from staff keying paper applications into an eligibility system since the information can be transferred from the pre-registration form to the eligibility system.
- Shortens the verification process. If a State has a pre-registration system with an identification authentication process, this will reduce verification processing time for staff.

Use a call-in model to accept telephonic applications and conduct interviews. A call-in model allows D-SNAP applicants to contact the State agency at a time that is convenient for them within the D-SNAP operating hours. In contrast, the call-out model requires the State agency to attempt to establish contact with the applicant, which often requires multiple phone call attempts and increases the possibility a household may not be reached.

FNS highly recommends that State agencies adopt a call-in model because it eases the household's burden of applying for D-SNAP and reduces how many times the State must call the applicant to establish contact. A State is not required to have a

centralized call center in order to implement a call-in model, however, the State must have some form of call center software in order to utilize the call-in model. Please note that a centralized call center is the most effective way to implement a call-in model.

Partner with a shipping service to mail cards to households overnight. After a disaster, it can be difficult for households to come into their local offices to retrieve an EBT card. States can opt to send EBT cards to approved households using overnight shipping if they are able coordinate with an overnight delivery service or with their EBT card provider. States that used a delivery service to overnight cards to households had fewer issues meeting the 72-hour timeliness requirement.¹ The 72-hour requirement is essential to ensure households affected by the disaster receive their EBT card and benefits quickly.

FNS recommends, as a best practice, that States ship EBT cards overnight to approved households. If the State is not able to ship cards overnight, they should consider an in-person distribution method.

Provide hybrid operations with opportunities for in-person components. States may request to operate a hybrid D-SNAP with virtual and in-person components. A hybrid model offers greater flexibility for staff and for households. It also allows States to tailor their D-SNAP operation to the specific circumstances of the disaster area. Allowing for hybrid operations provides the following benefits:

- Improves program access. Households without access to the internet or phone may apply in-person while households with limited mobility or access to transportation may apply online or by phone.
- Improves customer service. Households that may need additional assistance with the application may prefer to apply in-person.
- States will have fewer issues with crowding and public health concerns if only a limited number of individuals apply in-person.

FNS asks States to work closely with their Regional Office when disasters occur. Since every disaster and D-SNAP operation is unique, FNS reviews each D-SNAP request individually to determine whether retail food channels are available and accessible, and the State has the capacity to operate D-SNAP given the projected size and scope of the operation.

¹ During a D-SNAP operation, States are responsible for ensuring that approved households have EBT cards in hand and can purchase food (also known as the opportunity to participate) within 72 hours of submitting an application. In cases where household information is questionable, States have up to 7 days from the date of application interview to provide households with the opportunity to participate.

The State must also ensure they are ready to implement a D-SNAP by doing the following:

- Train staff
- Make operational decisions
- Submit a D-SNAP request
- Notify the public and community partners of the operation
- Prepare for EBT card distribution

FNS is available to assist State agencies in developing annual D-SNAP plans and D-SNAP requests to respond to disasters and the needs of the impacted communities. We encourage States to consider the best practices in this memo as they prepare for future disasters and D-SNAP operations. States should also continue to share common challenges and lessons learned so FNS can help better prepare for future disasters.

State agencies with questions should contact their Regional Office representatives.

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