



Food and Nutrition Service

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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Use of Virtual Disaster SNAP (D-SNAP) Operations in Remainder of FY 2021 and FY 2022

TO: All SNAP State Agencies  
All Regions

<b>Issuing Agency/Office:</b>	FNS/SNAP
<b>Title of Document:</b>	Use of Virtual Disaster SNAP (D-SNAP) Operations in Remainder of FY 2021 and FY 2022
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<b>Summary:</b>	FNS expects virtual Disaster Supplemental Nutrition Assistance Program (D-SNAP) operations may be needed through the remainder of FY 2021 and FY 2022. FNS will continue to review requests to use virtual operations on a case-by-case basis when a State submits a D-SNAP waiver request. States are encouraged to use the enclosed best practices for any future virtual D-SNAPs.

Traditionally, State agencies conduct the Disaster Supplemental Nutrition Assistance Program (D-SNAP)<sup>1</sup> via an entirely in-person application and interview process. Since the onset of the COVID-19 pandemic, the Food and Nutrition Service (FNS) has approved novel virtual components of D-SNAP operations as States were forced to shift to fully virtual or hybrid models to ensure social distancing. These novel operations used a mixture of methods and relied on virtual elements to varying degrees.

This memo provides States with information about how FNS will evaluate requests to use virtual components in D-SNAP operations for the remainder of FY 2021 and FY 2022 when necessary due to the COVID-19 pandemic. Additionally, this guidance provides States with best practices to ensure virtual D-SNAP operations do not compromise program access or integrity. Until more data are available regarding the effect of virtual D-SNAP on program access and integrity, FNS cannot determine if virtual D-SNAP operations should be widely used outside the context of COVID-19 or formalized in D-SNAP plans.

<sup>1</sup> Activities associated with operating D-SNAP are approved under Office of Management and Budget Control Numbers 0584-0336 and 0584-0037.

### **D-SNAP Requests for the Remainder of FY 2021**

FNS expects virtual components in D-SNAP operations may be needed through the remainder of FY 2021 as State agencies continue to address social distancing needs and adapt to the COVID-19 pandemic. State agencies may continue to request virtual components as needed, on a case-by-case basis. This is a continuation of FNS's current practices.

### **D-SNAP State Plans for FY 2022**

FNS does not plan to provide general authorization for virtual operations in the FY 2022 D-SNAP plans due to the current lack of data to evaluate the impact of these models. States are not expected to include a plan for virtual operations in their FY 2022 D-SNAP plans.

### **D-SNAP Requests in FY 2022**

As in FY 2021, FNS will continue evaluating virtual D-SNAP components as part of individual D-SNAP requests on a case-by-case basis in FY 2022, until FNS can make a well-informed decision about the feasibility of virtual D-SNAP operations outside the context of the COVID-19 pandemic. Enclosure 1 provides a list of capabilities FNS recommends State agencies have to address or mitigate common challenges in virtual D-SNAP operations, based on lessons learned throughout the COVID-19 pandemic. FNS expects States requesting to operate D-SNAP with virtual components in FY 2022 to demonstrate consideration of all the Tier 1 capabilities and at least three of the Tier 2 capabilities outlined in Enclosure 1, to the extent possible while maintaining any needed social distancing requirements. FNS recommends that D-SNAP requests describe how the State agency will meet the goals of both tiers and what other practices they will employ to ensure access and program integrity are maintained. In practice, FNS expects requests will cover all of the goals of the Tier 1 capabilities and at least three of the Tier 2 capabilities. FNS will work with State agencies to develop alternative solutions and strategies if these benchmarks are not achievable in the context of a specific disaster.

### **Virtual D-SNAP Operations**

FNS is not prescribing a specific model for virtual D-SNAP operations. D-SNAP is designed to be flexible and adaptable to meet the needs of the population served and the size, scope, and scale of the disaster. When determining how to operate virtual D-SNAP, States need to consider potential technological challenges and program access barriers to successfully conduct a virtual D-SNAP operation. To ensure these challenges do not negatively affect access to D-SNAP for eligible households or program integrity, FNS recommends that the State agency have certain capabilities to address or mitigate common challenges. These capabilities are described in detail in Enclosure 1.

States should assess whether they are likely to experience any of the common challenges associated with virtual D-SNAP outlined in Enclosure 2. In particular, FNS is concerned about ensuring equitable access between urban and rural areas, and for households that may struggle with telephonic or online D-SNAP processes (including the elderly, individuals experiencing homelessness, and individuals with disabilities). If States lack any of the listed critical capabilities to address a given challenge as described in Enclosure 2, the State should indicate the alternative method it will use to address the associated challenges in its D-SNAP request for FNS review.

FNS is available to assist State agencies in developing D-SNAP plans and requests to respond to disasters during the COVID-19 pandemic. We also encourage States to continue sharing evaluation reports, best practices, and challenges to improve evaluation of novel virtual D-SNAP models.

State agencies with questions should contact their respective Regional Office representatives.

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Enclosures

## Enclosure 1: Tiered Capabilities for Virtual D-SNAP

States must consider potential technological challenges and program access barriers to successfully conduct a virtual D-SNAP operation. To ensure these challenges do not negatively affect access to D-SNAP for eligible households or program integrity, FNS recommends that the State Agency have certain capabilities to address or mitigate common challenges.

This document includes a list of capabilities, categorized into “Tier 1” capability or a “Tier 2” capability. FNS expects that States operating virtual D-SNAPs should be able to meet all of the Tier 1 capabilities and at least three of the Tier 2 capabilities discussed in this document. If States are unable to meet these expected capabilities, they should indicate how they will address the associated challenges (outlined in Attachment 2) in their D-SNAP request.

All D-SNAP operations, virtual or in-person, must comply with all civil rights requirements and provide accommodations for the elderly and disabled. State agencies, local agencies, and other sub-recipients must ensure equal access to FNS programs for persons with disabilities. Title II of the Americans with Disabilities Act of 1990 and the ADA Amendments Act of 2008 prohibits discrimination based on disability by State and local government.

### Definitions of Capabilities

#### Tier 1 Capabilities

- *Ability to accommodate applicants who cannot complete the application or interview virtually:* Some households will not have internet or computer access, or may otherwise face challenges in completing an online or phone application. The State should offer an in-person D-SNAP application site in addition to virtual operations, or work with individual households to schedule appointments at a local office, as needed.
- *Ability to meet the 72-hour EBT card issuance deadline:* A household should have D-SNAP benefits in hand and be able to purchase food within 72-hours of applying.
- *Ability to use a “call-in” model for telephonic applications and interviews:* A call-in model allows D-SNAP applicants to contact the State agency at a time that is convenient for them, in contrast to the “call-out” model, which requires the State agency to attempt to establish contact with the applicant, often through multiple phone calls. The 2020 disaster season demonstrated that the call-in model is significantly more client-friendly and less burdensome for the State agency. A State does not necessarily need a centralized call center in order to implement a call-in method, though some form of call center software is needed. A centralized call center is one of the most effective ways to implement a call-in model.

- *Ability to verify identity through electronic means:* A household's identity must be verified to receive D-SNAP benefits. States have had success verifying identity through online identity authentication systems. Online identity authentication systems allow the applicant to authenticate their identity, often by using a set of multiple-choice questions produced by a third-party vendor based on electronically matched public records. Alternatively, some States have had success in verifying identity by linking to the State's Department of Motor Vehicles and/or providing a secure online portal to which households can upload or send a copy of their identification to the State. Secure fax lines may also be used, but faxing is not an acceptable method to electronically verify identity if used alone because it is not easily accessible to most households. Although States may encourage households to verify identity through an online authentication system, it must be an option to applicants that they can choose to opt into or out of at any time without negative consequences. Further guidance from FNS on online identity authentication systems is available here: [Identity Authentication Pilot Projects – Conversion to State Option | USDA-FNS](#).

### Tier 2 Capabilities

- *An online pre-registration system:* An online pre-registration system is an online system that households can access to submit any needed information to the State prior to an interview. This may be a virtual copy of the D-SNAP application that a household may fill out online, or it may be incorporated within a more robust portal that allows households to securely upload required verification.
- *A secure online portal to permit electronic submission of documents:* This capability is particularly important if the State agency is unable to virtually verify identity through an online identity authentication system or a linkage to the State's Department of Motor Vehicles. However, this capability can also permit applicants to provide other forms of verification when needed and to submit pre-registration information. Households must be able to securely provide documents that contain personally identifiable information (PII), if they are expected to provide verifications electronically. Federal guidance on protecting PII is available here: [M-06-16 \(whitehouse.gov\)](#).
- *Ability to accept telephonic applications:* A household may call a specific telephone number, either the call center or a local office, to complete the pre-registration or application over the phone with a worker. The household may then complete the interview at the same time. This is useful for households that may not have access to a computer.
- *Ability to conduct on-demand interviews by phone:* After submitting a pre-registration or application, a household may call to complete the interview at its convenience during the D-SNAP application period, instead of scheduling a specific date and time for the interview or requiring the household to appear at a specific site.

- *A call center for completing applications and interviews:* Under this model, a household can call a centralized call center to apply and interview for D-SNAP, rather than waiting for the State agency to call them or go onsite. Call wait times should be tracked and staff levels should be able to be augmented to accommodate a rise in callers. The call center should also have the ability to run daily reports, at least, on call wait times, dropped calls, abandoned calls, and average call length.
- *Ability to run daily reports on virtual components:* All D-SNAP operations have daily reporting requirements, under current D-SNAP guidance. States are required to report on the number of applications received and processed daily. Telephonic D-SNAP operations should include additional reporting requirements including call wait times, dropped calls, abandoned calls, and average call length. Online components should also include additional reporting requirements, like the number of applications that are pending submission of verification. If States are responsible for contacting the client for the interview, the number of call attempts made should be reported.
- *Ability to automate expedited benefit and card issuance:* The State should be able to establish a workaround in the eligibility system to cue the State's EBT card vendor to prioritize issuing benefits and mailing the EBT card (e.g., a coding that would lead the vendor to treat the case as if it were an expedited SNAP case).

## Enclosure 2: How Capabilities Will Address Common Challenges

FNS identified common challenges identified in virtual D-SNAP operations and how the previously defined capabilities can address or mitigate each challenge. If a State lacks all of the capabilities to address or mitigate a challenge, the State agency should indicate in its D-SNAP request the alternative procedures it will use to ensure the challenge does not negatively impact program access or program integrity.

Challenge: Contacting the client. When a D-SNAP is not operated in-person, the State agency must contact the applicant to complete an application and/or an interview. For States that operate the “call-out method” (meaning, the State agency must reach the household by phone, rather than allowing the household to call in at their convenience), reaching the applicant for the interview during the application period has been a major challenge. Applicants may not answer their phone, their voicemail may be full, or when they attempt to call the eligibility worker back, the worker is on another line.

- *Tier 1 Capability:* Ability to use a “call-in” model for telephonic applications and interviews.
- *Tier 2 Capability:* A centralized call center where call wait times can be tracked and staff can be augmented to accommodate a rise in callers.
- *Tier 2 Capability:* Conduct on-demand interviews by phone
- *Tier 2 Capability:* Accept telephonic applications
- *Tier 2 Capability:* An online pre-registration system

Challenge: Electronic Identity Verification. Identity must be verified before processing the application.

- *Tier 1 Capability:* Ability to verify identity through electronic means. Options include use of an online identity authentication system, linkage to the State’s Department of Motor Vehicles, or use of a secure online portal.
- *Tier 2 Capability:* A secure online portal to permit electronic submission of documents, including identity verification. Linking the received verification to the appropriate file may be a further challenge.

Challenge: Ensuring clients have access to benefits within 72 hours. Under current D-SNAP guidance, State agencies are required to issue benefits to approved households within 72 hours of approval. Households must have their EBT card in-hand with benefits loaded within this timeframe.

- *Tier 1 Capability:* The State must be able to meet the 72-hour issuance deadline.
- *Tier 2 Capability:* Establish a workaround in the eligibility system to cue the State’s EBT card vendor to prioritize mailing the EBT card (e.g., a coding that would lead the vendor to treat the case as if it were an expedited SNAP case). If the State cannot automate a way for D-SNAP cases to be prioritized by the vendor, States should ensure they will have sufficient staffing to complete manual issuance of cards within 72 hours with built-in quality control measures to ensure clients will receive their cards timely. States may also set up a process for clients to pick up their cards at a local office.

Challenge: Equitable access for elderly and disabled applicants. Some households, including those with elderly and disabled members, have limited internet and phone access. Strictly virtual application and interview procedures may prove challenging. Submitting verifications electronically may be particularly challenging.

- *Tier 1 Capability:* Compliance with all civil rights requirements and provision of accommodations for elderly and disabled applicants.
- *Tier 1 Capability:* Ability to accommodate applicants who cannot complete the application or interview virtually through an in-person D-SNAP application site or appointments at a local office.
- *Tier 2 Capability:* Accept telephonic applications from households that are unable to submit a pre-registration online.
- *Tier 2 Capability:* A secure online portal to permit electronic submission of verification documents and pre-registration information.

Challenge: Remote access to eligibility systems. If the State agency plans to have employees working remotely, a sufficient number of staff need remote access to the eligibility system.

- The 2020 disaster season has not provided evidence of a single preferred strategy to address this challenge. To ensure that States are considering the limitation that remote work could pose, agencies should explain in their D-SNAP requests how workers will access the eligibility system remotely, if needed.

Challenge: Program Integrity Monitoring. FNS staff and fraud investigators need sufficient access to virtual D-SNAP operations in order to monitor program integrity. In addition, FNS currently requires a statistically significant sample size of telephonic D-SNAP applications to be reviewed. The State agency should be aware that this is typically a much larger sample size than is required for in-person applications.

- The 2020 disaster season has not provided evidence of a single preferred strategy to address program integrity monitoring and fraud investigations. To ensure States consider how to incorporate program integrity monitoring into any virtual components, D-SNAP requests that use virtual components should include a description of how States will work with Regional staff to facilitate program integrity monitoring.