



Food and
Nutrition
Service

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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Disaster SNAP (D-SNAP) Policy Clarifications for Traditional and Virtual Operations

TO: All SNAP State Agencies
All Regions

State agencies have faced unprecedented challenges during the last two fiscal years while operating a D-SNAP with a virtual component. This memo clarifies the following Disaster Supplemental Nutrition Assistance Program (D-SNAP) policies for virtual, hybrid or in person environments: food loss alone for D-SNAP eligibility, 72-hour timeliness requirement and needs assessment.

Food Loss Alone: A household may be eligible for D-SNAP benefits if they experienced an adverse effect as the result of a disaster, meet the D-SNAP income eligibility limits, and do not already receive SNAP. Adverse effects may include loss of income, inability to access liquid resources, disaster-related expenses, and food loss.

State agencies have the option to submit a D-SNAP request that includes eligibility for households whose **only** adverse effect was food loss, known as “food loss alone”. All D-SNAP requests must include food lost due to the disaster when calculating disaster-related expenses, but only D-SNAP requests that include “food loss alone” can use food loss as the only qualifying adverse effect. State agencies should indicate if they wish to use “food loss alone” in their D-SNAP request to FNS and provide data such as, power outage data and flood maps to support the request.

Before requesting to allow “food loss alone”, State agencies should carefully consider the characteristics of the disaster and the impacted area. Using “food loss alone” as a qualifying eligibility factor enables the State agency to serve more individuals impacted by the disaster via D-SNAP. State agencies should consider the following questions to determine whether the disaster impacts are great enough to warrant “food loss alone.”

- Did the disaster cause structural damage in a residential or commercial area? If the disaster caused structural damage primarily to businesses, “food loss alone” may not be a relevant factor.
- Were applicants without power for multiple days? If so, “food loss alone” could be a relevant factor.

If a State agency is approved to use “food loss alone” as a qualifying eligibility factor, the State agency must use the Disaster Gross Income Limit (DGIL) guidelines to determine household eligibility. State agencies cannot use the Disaster Standard Expense Deduction (DSED) to determine eligibility in D-SNAP’s that include “food loss alone” as a qualifying factor (DSED allows State agencies to use a standardized amount to deduct disaster related expenses).

72-Hour Timeliness Requirement. During a D-SNAP, State agencies are responsible for ensuring that approved households receive their electronic benefit transfer (EBT) cards and can purchase food (also known as the opportunity to participate) as soon as possible and no later than 72 hours of submitting an application.¹ In a virtual D-SNAP, the 72 hours starts at the time of interview, not when a pre-registration form is submitted. In cases where household information is questionable, State agencies have up to 7 days from the date of application to provide households with the opportunity to participate.

State agencies have reported challenges with the processing standard while operating a virtual/hybrid operation. Some have had difficulties meeting this requirement due to shipping delays or outstanding disaster impacts such as road closures or structural damage to relevant buildings. State agencies conducting D-SNAP with virtual components may need to mail cards overnight.

To prepare for a D-SNAP, State agencies should ensure staff understand that eligible households must be able to use their benefits within 72 hours of application and work with their EBT processor to ensure benefits are issued in a timely manner. FNS encourages State agencies to make accommodations for card issuance and to follow all issuance requirements and best practices from the D-SNAP guidance. Additionally, State agencies must explain to approved applicants how they will receive their EBT card (e.g., at the application site, at a local office, or by mail) and how to use it.

State agencies must explain their EBT issuance procedures in their annual D-SNAP State Plan. The plan should clearly state how the State agency will meet the 72-hour requirement. If a State agency plans to issue EBT cards onsite, the State agency should explain how they will securely store and manage card stock. State agencies may need to deviate from their planned processes when responding to a disaster. Therefore, State agencies should explain how they will meet the 72-hour requirement in each individual D-SNAP request.

Needs Assessment: To demonstrate the disaster’s impact, State agencies are required to provide FNS with verification of a Presidential Disaster Declaration for Individual Assistance and a needs assessment. A needs assessment is a

¹ In virtual operations, the date of application is typically the interview date.

collection of materials that documents the extent of a disaster's impact and provides details about the affected population. A State agency should perform a needs assessment before submitting a D-SNAP request to determine if a D-SNAP is an appropriate response to the disaster. For example, if a disaster impacted an area that is mostly high income or a commercial area, very few households, if any, may be eligible. However, if the disaster impacted an area with many low-income families or the location of a major employer for the area, a D-SNAP may be more appropriate.

It may be difficult for State agencies to collect detailed information immediately after a disaster. State agencies may submit a variety of materials as part of the needs assessment in their D-SNAP request, including, but not limited to:

- FEMA and local emergency management assessments
- Power outage maps and data
- Flood maps
- News clips and articles reporting on damage
- Storm path maps
- Census data
- SNAP household data

FNS encourages State agencies to work with their State Office of Emergency Management and other partners to gather information and data for the needs assessment.

State agencies are encouraged to inform their FNS Regional Office of the disaster as soon as possible. Since every disaster and D-SNAP is unique, FNS reviews each D-SNAP request individually and determines if the State agency has the capacity to operate a D-SNAP given the size projections and scope of the operation. To ensure a seamless review and approval process, State agencies should demonstrate in their request that they are ready to implement a D-SNAP, including that they are prepared to do the following:

- Train an adequate number of staff
- Make operational decisions
- Notify the public and community partners of the operation
- Prepare for timely EBT card distribution

FNS is available to assist State agencies in developing annual D-SNAP plans and D-SNAP requests that respond to the needs of the impacted communities. FNS encourages State agencies to consider these policy clarifications as they prepare for future disasters and D-SNAP operations. FNS also asks State agencies to share

policy concerns and questions so FNS can help all State agencies better prepare for and respond to future disasters.

State agencies with questions should contact their Regional Office representatives.

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