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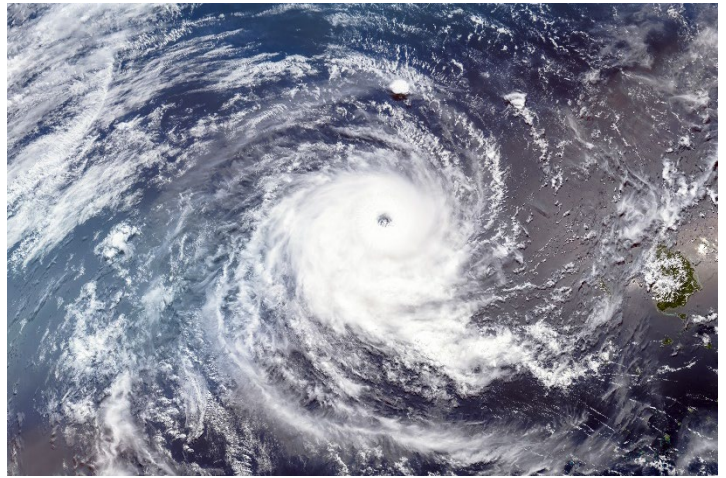
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United States Department of Agriculture

# Best Practices in Disaster SNAP Operations and Planning

## Final Report



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# Best Practices in Disaster SNAP Operations and Planning

## Final Report

December 2023



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# Contents

---

Executive Summary.....	i
Chapter 1. Introduction .....	1
A. Overview .....	1
B. Study Overview and Objectives .....	4
Chapter 2. Methodology .....	7
A. Qualitative Data Collection and Analysis .....	7
B. Quantitative Data Collection and Analysis.....	10
Chapter 3. Louisiana Case Study .....	13
A. Hurricane Laura (2020) Overview .....	13
B. General Planning.....	14
C. Event-Specific Planning.....	16
D. Implementation .....	18
E. Operations .....	23
F. Reporting and Closeout .....	27
G. Characteristics of Affected Households.....	28
H. Geospatial Impact of D-SNAP .....	31
I. Data Limitations .....	32
J. Conclusions .....	32
Chapter 4. North Carolina Case Study .....	34
A. Tornado and Hurricane Florence (2018) Overview .....	34
B. General Planning.....	36
C. Event-Specific Planning.....	38
D. Implementation .....	39
E. Operations .....	42
F. Reporting and Closeout .....	47
G. Characteristics of Affected Households.....	48
H. Geospatial Impact of D-SNAP .....	55
I. Data Limitations .....	56
J. Conclusions .....	56
Chapter 5. Oregon Case Study .....	58
A. Wildfires (2020) Overview .....	58
B. General Planning.....	59

C. Event-Specific Planning .....	60
D. Implementation .....	62
E. Operations .....	65
F. Reporting and Closeout .....	68
G. Characteristics of Affected Households.....	68
H. Geospatial Impact of D-SNAP .....	71
I. Data Limitations .....	71
J. Conclusions .....	71
Chapter 6. Tennessee Case Study .....	73
A. Severe Storms (March 2020) Overview .....	73
B. General Planning.....	74
C. Event-Specific Planning.....	75
D. Implementation .....	76
E. Operations .....	81
F. Reporting and Closeout .....	85
G. Characteristics of Affected Households.....	86
H. Geospatial Impact of D-SNAP .....	89
I. Data Limitations .....	90
J. Conclusions .....	90
Chapter 7. Key Findings and Best Practices .....	92
A. Key Findings .....	92
B. Best Practices and Opportunities to Improve Planning.....	93
C. Best Practices and Opportunities to Improve Implementation.....	94
D. Best Practices and Opportunities to Improve Operations.....	95
E. Best Practices and Opportunities to Improve Reporting and Closeout.....	97
F. Study Limitations .....	98
References .....	100

## Tables

Table 1.1. Overview of Selected D-SNAPs.....	6
Table 2.1. Study Objectives by Data Source .....	7

Table 2.2. Documents Collected .....	8
Table 2.3. Site Visit Details and Interviews Completed .....	9

## Figures

Figure 1.1 Map of Selected D-SNAPs .....	5
Figure 3.1. Map of D-SNAP Parishes, 2020 Hurricane Laura, Louisiana .....	13
Figure 3.2. Timeline of the D-SNAP Operation, 2020 Hurricane Laura, Louisiana.....	14
Figure 3.3. Louisiana’s Virtual D-SNAP Application Process .....	24
Figure 3.4. Characteristics of D-SNAP Households, 2020 Hurricane Laura, Louisiana .....	29
Figure 3.5. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Parishes, 2020 Hurricane Laura, Louisiana.....	30
Figure 3.6. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Parishes, 2020 Hurricane Laura, Louisiana .....	31
Figure 3.7. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Hurricane Laura, Louisiana .....	31
Figure 4.1. Map of D-SNAP Counties and Sites, 2018 Tornado and Hurricane Florence, North Carolina.....	35
Figure 4.2. Timeline of the D-SNAP Operation, 2018 Tornado, North Carolina .....	36
Figure 4.3. Timeline of the D-SNAP Operation, 2018 Hurricane Florence, North Carolina .....	36
Figure 4.4. North Carolina’s In-Person D-SNAP Application Process .....	43
Figure 4.5. Characteristics of D-SNAP Households, 2018 Hurricane Florence, North Carolina .....	49
Figure 4.6. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Hurricane Florence, North Carolina .....	50
Figure 4.7. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Hurricane Florence, North Carolina.....	50
Figure 4.8. Characteristics of SNAP Supplement Households, 2018 Hurricane Florence, North Carolina.....	51
Figure 4.9. Characteristics of D-SNAP Households, 2018 Tornado, North Carolina .....	52
Figure 4.10. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Tornado, North Carolina .....	53
Figure 4.11. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Tornado, North Carolina .....	53
Figure 4.12. Distribution of Race and Ethnicity Among D-SNAP and SNAP Household Heads in D-SNAP Counties, 2018 Tornado, North Carolina.....	54
Figure 4.13. Characteristics of SNAP Supplement Households, 2018 Tornado, North Carolina .....	55
Figure 4.14. Number of Households Enrolled in D-SNAP, by Census Tract, 2018 Tornado an Hurricane Florence, North Carolina .....	56



Figure 5.1. Map of D-SNAP Counties, 2020 Wildfires, Oregon .....	58
Figure 5.2. Timeline of the D-SNAP Operation, 2020 Wildfires, Oregon .....	59
Figure 5.3 Oregon’s Virtual D-SNAP Application Process .....	65
Figure 5.4. Characteristics of D-SNAP Households, 2020 Wildfires, Oregon .....	69
Figure 5.5. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2020 Wildfires, Oregon .....	70
Figure 5.6. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2020 Wildfires, Oregon.....	70
Figure 5.7. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Wildfires, Oregon.....	71
Figure 6.1. Map of D-SNAP Counties and Sites, 2020 Severe Storms, Tennessee.....	73
Figure 6.2. Timeline of the D-SNAP Operation, 2020 Severe Storms, Tennessee .....	74
Figure 6.3. Tennessee’s In-Person D-SNAP Application Process.....	81
Figure 6.4. Tennessee’s Virtual D-SNAP Application Process .....	83
Figure 6.5. Characteristics of D-SNAP Households, 2020 Severe Storms, Tennessee .....	87
Figure 6.6. Distribution of Urban and Rural Households Among D-SNAP and SNAP Households in D-SNAP Counties, 2020 Severe Storms, Tennessee.....	88
Figure 6.7. Employment Status Among D-SNAP and SNAP Households in D-SNAP Counties, 2020 Severe Storms, Tennessee .....	88
Figure 6.8. Characteristics of SNAP Supplement Households, 2020 Severe Storms, Tennessee .....	89
Figure 6.9. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Severe Storms, Tennessee .....	90

## Executive Summary

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This report presents the results of a U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) study to assess the implementation of Disaster Supplemental Nutrition Assistance Program (D-SNAP) operations at the State agency level in four States in the aftermath of a natural disaster and identify best practices in D-SNAP operations. Under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Secretary of Agriculture can authorize requesting State agencies to operate D-SNAP (1) in areas that have had disasters that warrant a Presidential disaster declaration authorizing Individual Assistance from the Federal Emergency Management Agency (FEMA) and (2) once commercial channels of food distribution are available. Only households that do not participate in SNAP are eligible for D-SNAP. Under the same authority, State agencies can also provide short-term disaster supplements to ongoing SNAP households. FNS and State agencies have a range of additional strategies for providing nutrition assistance in the wake of a disaster, but this report focuses on D-SNAP. The study has five objectives:

1. Assess the implementation and operation of D-SNAP for selected disaster(s) in each study State.
2. Document each State's approach to protecting program integrity while operating D-SNAP for the selected disaster(s).
3. Describe the characteristics and economic circumstances of the D-SNAP households for the selected disaster(s).
4. Determine best practices for developing annual disaster plans to address a variety of disaster types.
5. Determine best practices for implementing and operating D-SNAP for a variety of disaster types.

### A. Methods

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This study drew primarily on case study methodology to assess D-SNAP operations in four State agencies that operated at least one D-SNAP between spring 2018 and fall 2020: Louisiana, North Carolina, Oregon, and Tennessee (see table ES.1). North Carolina operated two D-SNAPs during that time, and both were included in the study. FNS selected these State agencies to ensure variety across disaster types, scales of operation, and geographic regions.

**Table ES.1. State Agencies Selected for Study Participation**

State	Disaster	Date of Disaster	Counties Affected	D-SNAP Application Period	Benefit Period <sup>a</sup>	D-SNAP Households Served <sup>b</sup>	Total D-SNAP Benefits Issued <sup>c</sup>	Type of D-SNAP
Louisiana	Hurricane Laura	August 27, 2020	21	September 10–23, 2020	August 25–September 23, 2020	41,936	\$37.3 million	Virtual
North Carolina	Hurricane Florence	September 14, 2018	34	September 18–November 9, 2018 <sup>d</sup>	September 7–October 6, 2018	205,449	\$84.5 million	In person
	Tornado	April 15, 2018	2	May 17–22, 2018	April 15–May 14, 2018	2,581	\$1.0 million	In person
Oregon	Wildfires	Beginning September 7, 2020	8	October 23–28, 2020	September 7–October 6, 2020	168	< \$0.1 million	Virtual
Tennessee	Severe storms	March 3, 2020	3	March 16–24, 2020	March 20–April 1, 2020	2,354	\$0.8 million	Hybrid <sup>e</sup>

<sup>a</sup> The timeframe the State agency used to determine eligibility based on a household’s income, resources, disaster-related expenses, and other circumstances

<sup>b</sup> Number of D-SNAP households served was derived from administrative data files provided by the States. In some instances, these numbers differ from the numbers reported in other sources.

<sup>c</sup> Total D-SNAP benefits issued does not include SNAP supplements issued to participants in North Carolina or Tennessee.

<sup>d</sup> The D-SNAP extended over a month, but each site accepted applications for 8 days.

<sup>e</sup> Tennessee planned an in-person D-SNAP but pivoted to virtual because of the COVID-19 pandemic.

The study team collected and analyzed qualitative and quantitative data from each State agency.

- ▶ The study team reviewed a comprehensive set of documents for each D-SNAP, including annual D-SNAP plans, waiver requests and approvals, postdisaster reports, training materials, site schematics, signs, press releases, State agency-level policy guidance, operations handbooks, and outreach materials.
- ▶ The study team conducted semi-structured interviews with SNAP State agency leadership, local office supervisory staff, eligibility workers and other frontline staff, and a variety of community partners and other interested parties. Interview topics included D-SNAP planning, implementation, operations, and closeout, as appropriate for each category of respondents.
- ▶ The study team collected administrative data on a census of SNAP and D-SNAP participants; these data included demographic, economic, geographic, and case characteristics.

The study team also interviewed FNS National and Regional Office staff about general D-SNAP operations and the specific case study D-SNAPs.

## B. D-SNAP Planning

SNAP regulations require State agencies to maintain disaster plans and submit an updated copy to the FNS Regional Office each year. To support the State agencies in developing and maintaining these plans, FNS provides *Disaster SNAP Guidance* (FNS, 2014), which describes D-SNAP policy, planning requirements, waiver request procedures, recommendations for D-SNAP operations, and post-D-SNAP steps. FNS also publishes a *State Agency D-SNAP Toolkit* (FNS, n.d.), which provides a variety of templates, sample materials, and checklists to help in D-SNAP planning and operations. Regional Offices

provide technical assistance and training throughout the planning process and may facilitate meetings of State agencies within the Region to discuss D-SNAP.

In all study State agencies, a core group of State agency staff are responsible for annual plan development. North Carolina, which administers SNAP at the county level, also requires counties to maintain a county-specific D-SNAP plan; these plans are reviewed by the State agency but are not submitted to FNS. The study State agencies took different approaches to describe disaster response in their plans. North Carolina and Tennessee described a generic disaster, with plans that could be customized to fit the specifics of the disaster once it has occurred. Louisiana's annual plan focused on a worst-case scenario of a disaster, with options to scale back as necessary. Oregon described potential responses to a wide range of disasters (e.g., earthquake, fire, flood, tsunami, ice storm); the document also included plans for a pandemic response. FNS Regional Offices are responsible for reviewing annual plans, making recommendations for improvements, and approving the plans.

All study State agencies emphasized the importance of incorporating other organizations, such as emergency response departments, local community organizations, and contractors, into the planning process. At minimum, annual D-SNAP plans should include information about these key partners and their contact details.

Study State agencies have processes for incorporating lessons learned from a disaster response into future versions of the annual D-SNAP plan. For example, Louisiana drafts After Action Reports that include recommendations intended to improve processes; actionable recommendations are then incorporated into the annual plan.

## C. D-SNAP Implementation and Operations

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State agencies draft and submit requests to operate a D-SNAP to their Regional Office. State agencies cannot formally request authorization to operate a D-SNAP until after a Presidential disaster declaration with Individual Assistance has been issued and normal channels of food distribution have resumed. However, State agencies may begin working with their Regional Office counterparts to develop the request before the disaster strikes. Requests typically include information on the disaster and the anticipated scope of the D-SNAP and describe details of planned operations. Regional Office staff review the requests and forward them to the National Office. FNS may make authorization contingent upon additional requirements.

Prior to the COVID-19 pandemic, D-SNAPs were in-person operations. Historically, applicants traveled to the D-SNAP site, completed a paper application, participated in an eligibility interview, and either received a loaded electronic benefit transfer (EBT) card for immediate use or were issued an EBT card with no benefits (i.e., unloaded) and had benefits added later. Technological improvements and the need for social distancing have prompted recent innovations in D-SNAP operations.<sup>1</sup> Of the five study D-SNAPs, two were in-person operations conducted prior to the COVID-19 pandemic, one started as an in-person operation and pivoted to a virtual operation midway, and two were primarily virtual. The strategies for implementing and operating D-SNAP across these disasters varied considerably.

Louisiana's preregistration system is broad in scope and operates continuously; households are encouraged to submit key pieces of information at any time before disasters strike to facilitate case processing in the aftermath of a disaster. Oregon and Tennessee set up online registration systems in

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<sup>1</sup> As a result of innovations developed during the COVID-19 pandemic, most States mail EBT cards to clients.

response to disasters. In Oregon, interested households submitted relevant details via an electronic portal during the week prior to the opening of the application period, and State agency staff mailed unloaded EBT cards to households that did not have one (e.g., households with children may have been issued a P-EBT prior to the wildfires). Preregistration and online registration systems provide valuable information to D-SNAP administrators about the likely magnitude of the demand for benefits, which can support staffing decisions, and reduce the amount of time needed to process applications during the limited application period.

Site selection is an important consideration for in-person D-SNAP operations. Sites must be easily accessible for applicants, appropriately sized for the anticipated volume of applicants, compliant with the Americans with Disabilities Act (ADA), and have sufficient resources for staff and applicants' physical comforts (e.g., shelter, drinking water, restrooms). North Carolina operated both study D-SNAPs from local SNAP offices; these locations were adequate for the scale of the disaster response, were ADA-compliant, had adequate resources, and were familiar to participants and staff. Tennessee also operated D-SNAP from local offices but added another site at a local training center to expand capacity. The State agency experienced some challenges with internet connectivity at the additional site, but the site met other criteria.

Once important operational decisions are made, States must inform the public about the location, availability, and timing of the D-SNAP. States used a variety of public awareness campaigns to inform the public of the D-SNAP. Three States included hotlines or known phone numbers in their public awareness campaigns. Louisiana and Oregon used 211, and Tennessee used a call line to its Family Assistance Service Center.

Because State agencies must continue regular operations during a D-SNAP, staffing is always an important consideration. The study shows that State agencies used different approaches to staffing their D-SNAP operations. North Carolina recruited local agency staff from other departments to support in-person D-SNAP operations and sent paper applications to other counties for data entry. Tennessee brought in SNAP workers from neighboring counties unaffected by the disaster. For their virtual D-SNAPs, Louisiana and Oregon were able to rely on a decentralized workforce. Louisiana required all SNAP workers (almost 1,000) to participate in D-SNAP operations and assembled virtual teams of about 45 people each. Oregon, for its smaller D-SNAP, relied on a core team of experienced eligibility workers in the Virtual Eligibility Center. Across all D-SNAPs, effective management used a clearly defined structure for decision making and ensured immediately accessible policy guidance through team chats or in-person experts.

In-person and virtual D-SNAPs had some staff communication structures in common. North Carolina and Louisiana used daily morning team huddle meetings to provide updates, answer questions, and maintain staff morale. Upper management in North Carolina and Louisiana worked from "command rooms," which facilitated effective collaboration and decision making. Virtual teams in Oregon and Louisiana used group chats to ask and answer questions within their teams. These group chats highlighted the ease of information sharing in the virtual D-SNAP format.

The in-person D-SNAPs followed similar procedures. Upon arrival, staff provided applicants with information on the program and a paper application. Eligibility workers interviewed applicants. Applicants who were deemed likely to be eligible were given unloaded EBT cards, with benefits loaded remotely after eligibility workers made a final eligibility decision. This process occurred across many stations, which was thought to be the key to a successful D-SNAP operation. As applicants moved

physically through the building, staff provided updates on their progress and reiterated program policies and requirements.

During virtual D-SNAPs in Louisiana, Oregon, and Tennessee (once Tennessee pivoted to a virtual operation), applicants entered information into an electronic portal. Applicants in Louisiana and Oregon had specific days for their interviews, based on alphabetical order by last name. Oregon also provided in-person application assistance to households that went to local offices or met with SNAP personnel at mass emergency response sites.

Louisiana and Tennessee used an automated call-routing program to direct calls to the next available eligibility worker. Once a client was deemed eligible, the eligibility worker transferred the client to the EBT vendor to process their EBT card and route delivery. In Oregon, a centralized workshare coordinator provided each eligibility worker with a list of cases, and the workers called the applicants to conduct the interviews. Most households in Oregon had already received an EBT card by the time of the interview, and local office staff loaded benefits onto the cards remotely; cards were mailed to participants if needed.

## D. Program Integrity

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Across all study D-SNAPs, State agency staff used a consistent set of practices to maintain program integrity. Staff communicated fraud prevention information throughout the application process. All interviews were conducted by merit personnel, and all four State agencies ensured team leads, management, or program integrity staff were available to assist eligibility workers in addressing any uncertainty about an element of a case. In Louisiana, phone interviews were recorded, which may have deterred fraudulent behavior. Eligibility workers checked SNAP eligibility systems for duplicate participation and checked other databases to confirm identity. For all State agencies, management-level staff processed and/or reviewed all applications from State agency staff.

For the in-person D-SNAPs in North Carolina and Tennessee, staff kept EBT card stock in a secure location few staff members could access. All State agencies ensured separation of duties between eligibility determination and benefit issuance, including physical separation between the processes. None of the study State agencies preloaded EBT cards. State agencies provided applicants with unloaded cards and then loaded benefits onto the cards remotely once eligibility had been verified.

## E. Demographic and Economic Characteristics of D-SNAP Households

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The five D-SNAPs in the study ranged in size from 168 households during the wildfire in Oregon to 205,499 households during the hurricane in North Carolina.<sup>2</sup> In four of the five D-SNAPs, households often had one member; in Oregon, D-SNAP households often had four or more members. In both North Carolina D-SNAPs and in Tennessee, the head of the D-SNAP household was often identified as non-Hispanic Black or African American; in Louisiana and Oregon, the head of the D-SNAP household was often White. Across all five D-SNAPs, household heads were most commonly aged 25–44. In Louisiana and North Carolina, D-SNAP gross household incomes were most commonly 50–100 percent of the Federal Poverty Guidelines, but in Oregon, three-quarters of D-SNAP households reported no income.

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<sup>2</sup> The number of D-SNAP households served was derived from administrative data files provided by the States. In some instances, these numbers differ from the numbers reported in other sources.

Urban residence was most common across households in all D-SNAPs, ranging from 60.7 percent of households in the North Carolina hurricane D-SNAP to 93.1 percent of households in Tennessee.

D-SNAP household characteristics varied from the characteristics of SNAP households in the D-SNAP counties in several ways. In all cases, the number of SNAP households in the affected counties was greater than the number of D-SNAP households, ranging from 1.3 times in the North Carolina hurricane D-SNAP caseload to 990 times in the Oregon D-SNAP caseload. A higher proportion of SNAP households than D-SNAP households consisted of only one person in all D-SNAPs except Louisiana. In all D-SNAPs except Oregon, the age distribution of household heads skewed older for D-SNAP households than for SNAP households. In Louisiana and North Carolina, the distribution of gross household income skewed greater for D-SNAP households than for SNAP households, but in Oregon, D-SNAP households were much more likely to report no income. In all D-SNAPs except the North Carolina hurricane, the D-SNAP population was more highly concentrated in urban areas than the SNAP population. Because D-SNAP benefits are always issued at the maximum value for a given household size, but SNAP benefits are not, benefit amounts skewed higher for D-SNAP households in all D-SNAPs.

North Carolina and Tennessee included supplements for SNAP recipients in their emergency response; Louisiana and Oregon did not because all SNAP households were already receiving the maximum benefit level as part of the Families First Coronavirus Response Act. The number of SNAP households receiving supplements was less than 2,000 in the North Carolina tornado and Tennessee but was almost 100,000 in the North Carolina hurricane. Across all three disasters, supplement households most commonly had one member, and household heads were most commonly non-Hispanic Black or African American and 25–44 years old. Most supplement households received at least \$200 in monthly SNAP benefits before the addition of the supplement, and most lived in urban areas.

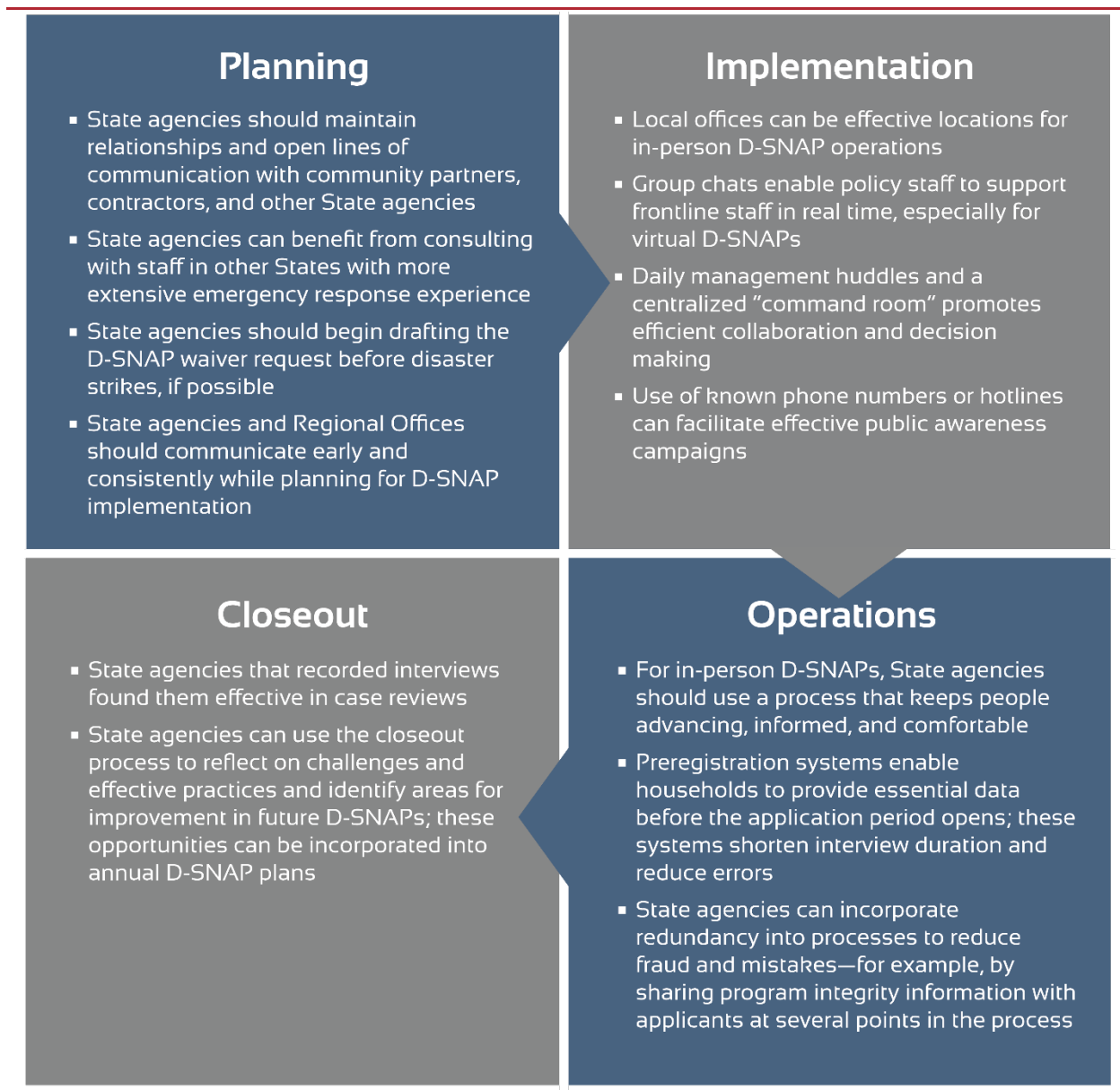
All study State agencies either used a different eligibility system for D-SNAP or tracked D-SNAP participants in a separate module of their eligibility system, so the eligibility systems were not able to track whether D-SNAP participants converted to SNAP participants. Oregon was able to conduct a manual match across data systems; 32 of the 168 D-SNAP households (19 percent) enrolled in SNAP within the 6 months following the disaster.

## **F. Best Practices in D-SNAP Planning and Operations**

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The study team drew on findings from interviews with FNS National and Regional Office staff, State agency staff, community partners, and other stakeholders to identify best practices in D-SNAP planning and operations (see figure ES.1).

**Figure ES.1. Summary of Best Practices**



Staff from the State agencies that operated virtual or hybrid D-SNAPs during the COVID-19 pandemic strongly recommended that FNS continue to allow virtual D-SNAPs after the need for social distancing is reduced. Virtual D-SNAPs improve program access, especially for participants with limited time or ability to visit an in-person D-SNAP operation. Virtual D-SNAPs reduce burden on frontline staff through increased flexibility in work times and locations. Virtual D-SNAPs are also less expensive to operate; they require less physical infrastructure and fewer expenses associated with staff travel, lodging, and meals. Virtual D-SNAPs also remove the need for State agency staff to travel to disaster areas and take up hotel rooms that may be needed by local residents affected by the disaster.



# Chapter 1. Introduction

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After a natural disaster, Supplemental Nutrition Assistance Program (SNAP) State agencies can request permission from the U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) to operate a Disaster Supplemental Nutrition Assistance Program (D-SNAP). Unlike SNAP, which provides low-income families a monthly benefit to purchase the food they need for a nutritionally adequate diet, a D-SNAP serves people who would not qualify for SNAP under normal circumstances but need temporary food assistance because of the impacts of a disaster on their property, possessions, and livelihood. Under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Secretary of Agriculture can establish a D-SNAP that State agencies may operate in areas affected by disasters that warrant a Presidential disaster declaration authorizing Individual Assistance (IA) from the Federal Emergency Management Agency (FEMA)<sup>3</sup> once commercial channels of food distribution are available in those areas. State agencies can also provide disaster supplements to ongoing SNAP households—additional benefits for 1 month, ensuring each SNAP household in the disaster-affected area receives the maximum benefit amount for its household size consistent with D-SNAP benefit amounts. State agencies can request additional waivers to meet the needs of people affected by a disaster.

## A. Overview

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### 1. Roles and Responsibilities: Federal Agencies

D-SNAP is an important part of a broader government response in the aftermath of a disaster. Effective collaboration and communication among various government agencies are essential to serve those in need after disaster strikes. The Federal Government’s National Response Framework designates various Emergency Support Functions (ESFs) to coordinate and use 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. 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 percent of disaster benefits and 50 percent of State administrative costs

FNS’s Office of Emergency Management coordinates with FEMA, State and local governments, and community-based organizations (CBOs) to provide direct assistance to disaster victims. For example, in the aftermath of a disaster, State or local disaster relief organizations can request infant formula or USDA Foods for use in emergency shelters. FNS also provides annual disaster response trainings and technical assistance to States submitting disaster-related waiver requests.

FNS also supports States’ efforts to provide D-SNAP benefits by offering 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

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<sup>3</sup> States must submit a formal D-SNAP request to FNS for approval.

information provided in postdisaster reviews and assessments to improve D-SNAP policy, training, and technical assistance.

## 2. Roles and Responsibilities: States

While the specific needs of affected populations vary from disaster to disaster, each SNAP State agency tends to follow similar planning, implementation, operations, and postdisaster processes. All SNAP State agencies must submit an annual D-SNAP plan to FNS. Once a disaster is imminent or strikes, the State agency staff work with others in their State and at the Federal level to develop and submit a D-SNAP waiver request to FNS, receive approval from FNS, and then operate the D-SNAP in accordance with the approved request. After the disaster, FNS requires the SNAP State agency to conduct case reviews and submit postdisaster reporting.

### Components of D-SNAP Waiver Request

- Information on the disaster and disaster impact
- Benefit and application period
- Eligibility criteria
- Processes for ongoing households, electronic benefit transfer (EBT) issuance, duplicate participation, and program integrity
- Anticipated issuance
- Logistics
- Staffing
- Plans for employee applications

### Planning

SNAP State agencies develop and submit annual D-SNAP plans to FNS that outline how they would implement and operate a D-SNAP. Annual D-SNAP plans may include a variety of information:

- ▶ Factors indicating when to implement a D-SNAP
- ▶ State agency personnel in charge during the emergency
- ▶ Public outreach plans
- ▶ Sample D-SNAP site schematics
- ▶ Eligibility criteria
- ▶ Application and benefit issuance processes
- ▶ Fraud prevention measures
- ▶ Caseworker training materials
- ▶ EBT card storage guidelines
- ▶ D-SNAP closeout procedures

### Implementation

Although State agencies cannot formally request authorization to operate D-SNAP until after a Presidential disaster declaration with IA has been issued and normal channels of food distribution have resumed, State agencies may begin working with their Regional Office counterparts to develop the request before the disaster strikes. Requests typically include information on the disaster and the anticipated scope of the D-SNAP (i.e., needs assessment) and describe details of planned operations.

The needs assessment is a collection of materials that show the extent of a disaster's impact and the affected population. A needs assessment may include FEMA and local emergency management assessments, power outage maps, flood maps, news clips or articles, storm path maps, census data, or

SNAP household data. Regional Office staff review the requests and forward them to the National Office. States can use the needs assessment to help determine whether they should request a D-SNAP. It can also help FNS understand the extent of the damage and if a D-SNAP is justified. FNS may make authorization contingent upon additional requirements.

After FNS approves the D-SNAP waiver request, State agencies can begin executing the D-SNAP according to their annual plans and operate the D-SNAP in accordance with FNS's direction and applicable Federal policies. States must also be prepared to adapt their plans and to quickly develop the details of the request and logistics of the program for each incident. Key steps for implementing a D-SNAP follow:

- ▶ Develop and conduct a public information campaign.
- ▶ Set up the D-SNAP site(s) and/or virtual operations, mobilize staff, and conduct necessary trainings.
- ▶ Ensure the site(s), whether virtual or in person, comply with civil rights laws (e.g., ADA requirements, access to interpreters).

### **Operations**

Clients may begin to apply for benefits at predetermined locations, known as D-SNAP sites. Prior to the COVID-19 pandemic, clients typically completed a paper application once they arrived at the D-SNAP site, met with an eligibility worker who reviewed their application and determined eligibility, and received an EBT card. If approved, benefits were made available via the EBT card within 72 hours. Some State agencies have implemented preregistration systems, which enable them to collect some of the necessary information from clients before they arrive at the D-SNAP site. During the COVID-19 pandemic, FNS granted approval for States to operate virtual D-SNAPs. Although States varied in their approach to virtual D-SNAP operations, clients were generally able to complete their D-SNAP application over the phone and receive their EBT card in the mail instead of traveling to a physical D-SNAP site.<sup>4</sup>

### **Program integrity**

State agencies are still responsible for upholding the highest degree of program integrity, civil rights compliance, and reporting to FNS. The task includes separating certification and issuance responsibilities among workers, tracking and maintaining an inventory of EBT cards, inputting denials in the eligibility system daily, and conducting duplicate participation checks.

### **Closeout and reporting**

SNAP State agencies are responsible for providing daily reports to FNS throughout D-SNAP certification and issuance. After the D-SNAP ends, the SNAP State agency must review 100 percent of employee D-SNAP cases and a random sample of 0.5 percent of all D-SNAP cases (with a minimum of 25 and a maximum of 500 cases). States that operate a virtual or hybrid D-SNAP are required in the conditions of approval to sample additional cases certified using a telephonic interview to assist FNS in analyzing and informing future policy regarding the use of telephone interviews for vulnerable populations in D-SNAP. The State agency must also complete a comprehensive postdisaster review.<sup>5</sup>

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<sup>4</sup> Guidance on conducting virtual D-SNAP operations is available at: <https://www.fns.usda.gov/snap/virtual-dsnap-reminders>

<sup>5</sup> For a timeline of D-SNAP reporting requirements, see FNS, 2014 (p. 72).

## Other waivers and policy flexibilities

In addition to the D-SNAP waiver request, SNAP State agencies can request a variety of other waivers and relief (i.e., flexibility) from Federal program rules to tailor their disaster response to the needs of their citizens.

- ▶ **Mass replacements:** While replacement benefits are always available by affidavit to SNAP households experiencing food loss, State agencies can request a mass replacement waiver to automatically replace a percentage of each SNAP household's monthly SNAP benefit without the households needing to travel to a local SNAP office to request a replacement. The mass replacement benefit waiver does not require a Presidential declaration authorizing IA.
- ▶ **Timely reporting:** A waiver of timely reporting can extend the normal 10-day timeframe for SNAP participants to report food loss and request replacement benefits.
- ▶ **Hot foods:** State agencies may request a hot foods waiver, which allows SNAP and D-SNAP participants in the disaster-affected area to purchase hot foods with their benefits (e.g., rotisserie chicken, hot soup from the deli counter).
- ▶ **Extended certification periods:** Under the authority of the Stafford Act, SNAP State agencies can request to extend certification periods and waive periodic reporting requirements for ongoing SNAP households in disaster-affected areas. This waiver ensures ongoing households do not see a lapse in benefits and helps alleviate administrative burden on staff as they operate a D-SNAP.
- ▶ **Disaster-related credit card purchases:** State agencies have begun asking FNS to relax a policy that allowed participants to claim credit card purchases for eligible disaster-related expenses (e.g., home repairs, shelter expenses) only if those expenses were paid off within the month. As justification, State agencies highlighted the record-high unemployment rate caused by the pandemic and shared that many families were facing financial hardship, which may result in credit cards being their only method to pay for essential items.

## B. Study Overview and Objectives

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As the number of natural disasters in the United States has increased in recent years (National Oceanic and Atmospheric Administration, 2019), so has State use of the D-SNAP. The frequency and geographic range of natural disasters have exceeded those in previous decades, and States that never operated D-SNAP are running programs for the first time. D-SNAP also faced new challenges as a result of the COVID-19 pandemic, which caused States to quickly pivot from in-person to virtual D-SNAP operations and offered new possibilities for efficiently serving disaster-affected populations.

### 1. Study Objectives

This study assesses D-SNAP planning, implementation, and operations, including program integrity; presents data on the households served by D-SNAP; and describes best practices from four States with recent D-SNAP experience. Specifically, the study was designed to meet five study objectives:

1. Assess the implementation and operation of D-SNAP for selected disaster(s) in each study State.
2. Describe the characteristics and economic circumstances of the D-SNAP households for the selected disaster(s).
3. Document each State's approach to protecting program integrity while operating D-SNAP for the selected disaster(s).

4. Determine best practices for developing annual disaster plans to address a variety of disaster types.
5. Determine best practices for implementing and operating D-SNAP for a variety of disaster types.

## 2. Selected States and D-SNAPs

Four States participated in the study (see figure 1.1): Louisiana, North Carolina, Oregon, and Tennessee. FNS selected States to represent a variety of disaster types and scopes. To be included in the study, each State must have operated at least one D-SNAP between 2018 and 2020. The study profiled two D-SNAPs in North Carolina. Two of the study States—Louisiana and Oregon —operated a virtual D-SNAP, and Tennessee operated a hybrid (i.e., in-person, then virtual) D-SNAP.

**Figure 1.1 Map of Selected D-SNAPs**

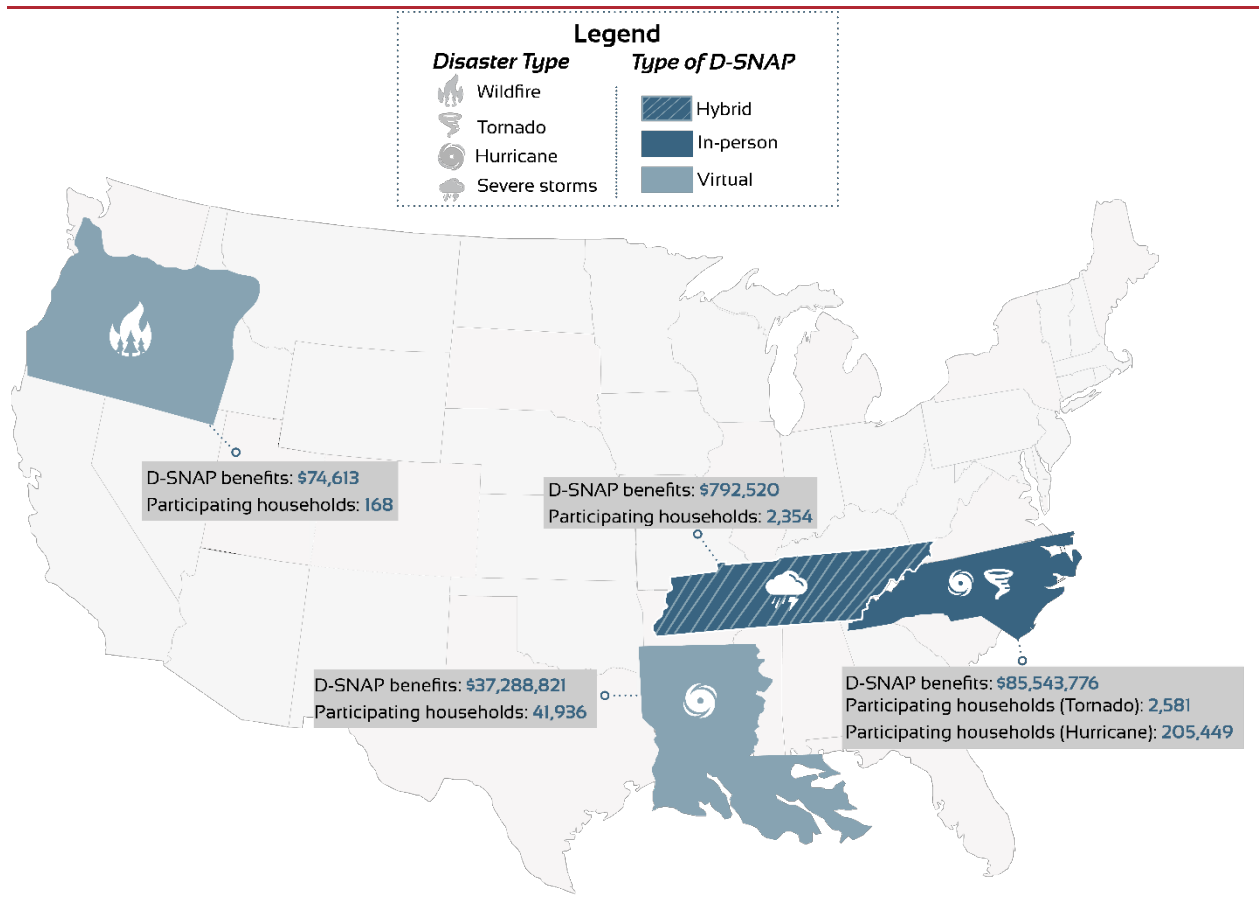


Table 1.1 presents details for each D-SNAP profiled in the study.

**Table 1.1. Overview of Selected D-SNAPs**

State	Disaster	Date of Disaster	Counties Affected	D-SNAP Application Period	Benefit Period <sup>a</sup>	D-SNAP Households Served <sup>b</sup>	Total Benefits Issued <sup>c</sup>	Type of D-SNAP
Louisiana	Hurricane Laura	August 27, 2020	21	September 10–23, 2020	August 25–September 23, 2020	41,936	\$37.3 million	Virtual
North Carolina	Hurricane Florence	September 14, 2018	34	September 18–November 9, 2018 <sup>d</sup>	September 7–October 6, 2018	205,449	\$84.5 million	In person
	Tornado	April 15, 2018	2	May 17–22, 2018	April 15–May 14, 2018	2,581	\$1.0 million	In person
Oregon	Wildfires	Beginning September 7, 2020	8	October 23–28, 2020	September 7–October 6, 2020	168	< \$0.1 million	Virtual
Tennessee	Severe storms	March 3, 2020	3	March 16–24, 2020	March 20–April 1, 2020	2,354	\$0.8 million	Hybrid <sup>e</sup>

<sup>a</sup> The timeframe the State agency used to determine eligibility based on a household's income, resources, disaster-related expenses, and other circumstances

<sup>b</sup> Number of D-SNAP households served was derived from administrative data files provided by the States. In some instances, these numbers differ from the numbers reported in other sources.

<sup>c</sup> Total D-SNAP benefits issued does not include SNAP supplements issued to participants in North Carolina or Tennessee.

<sup>d</sup> The D-SNAP extended over a month, but each site accepted applications for 8 days.

<sup>e</sup> Tennessee planned an in-person D-SNAP but pivoted to virtual because of the COVID-19 pandemic.

## Chapter 2. Methodology

The study used a combination of qualitative and quantitative data and assessment in a case study format to identify D-SNAP best practices and opportunities for improvement in the four study States (Louisiana, North Carolina, Oregon, and Tennessee).

The qualitative component included (1) a document review of extant D-SNAP data, policies, and State-level documents; (2) interviews with Federal staff; and (3) site visits with staff at State agencies, local offices, and other stakeholders (e.g., county emergency management offices, disaster response organizations, community partners).

The quantitative component included (1) descriptions of D-SNAP and SNAP households based on administrative data and (2) geospatial modeling to visually represent the distribution of D-SNAP households in counties or parishes participating in the D-SNAPs.

Table 2.1 presents the study objectives and data sources used to address them, and appendix A provides a more thorough crosswalk showing which data sources address the research questions for each study objective.

**Table 2.1. Study Objectives by Data Source**

Study Objective	Document Review	Interviews With Federal Staff	Site Visits	Administrative Data
1. Assess the implementation and operation of D-SNAP for selected disaster(s) in each study State	•	•	•	•
2. Document each State’s approach to protecting program integrity while operating D-SNAP for the selected disaster(s)	•	•	•	
3. Describe the characteristics and economic circumstances of the D-SNAP households for the selected disaster(s)				•
4. Determine best practices for developing annual disaster plans to address a variety of disaster types	•	•	•	
5. Determine best practices for implementing and operating D-SNAP for a variety of disaster types	•	•	•	

### A. Qualitative Data Collection and Analysis

The qualitative data analysis focused on synthesizing considerations and best practices related to planning, implementing, operating, and closing out a D-SNAP. Source material came from documents (e.g., annual D-SNAP plans, D-SNAP waiver requests and approvals, training materials, postdisaster reports) and interviews with staff at the Federal and State levels.

#### 1. Qualitative Data Collection

The study team collected publicly available D-SNAP documentation, requested State-level documents from FNS, and conducted interviews with Federal staff between February 2020 and August 2021. Upon receiving OMB clearance in July 2021, the study team requested documents directly from the States, and conducted site visits with participating States; these activities took place between November 2021

and April 2022. The study team also completed the remainder of the Federal staff interviews by May 2022.

### D-SNAP documents

The study team collected several types of documents during the study planning stage. These documents were provided by FNS or publicly available. State annual D-SNAP plans helped identify best practices related to disaster planning. The study team used additional documents collected from States during the site visits to triangulate interview findings and obtain further information on D-SNAP operations (see table 2.2).

**Table 2.2. Documents Collected**

Documents Obtained From FNS or Publicly Available	Documents Collected From States During Site Visits
<ul style="list-style-type: none"> <li>▪ Annual D-SNAP plans</li> <li>▪ D-SNAP waiver requests</li> <li>▪ D-SNAP waiver approvals</li> <li>▪ D-SNAP postdisaster reports</li> <li>▪ Publicly available newspaper articles or reports</li> <li>▪ D-SNAP applications*</li> <li>▪ D-SNAP outreach materials*</li> <li>▪ FEMA Preliminary Damage Assessment Reports</li> </ul>	<ul style="list-style-type: none"> <li>▪ Training materials</li> <li>▪ County-level disaster plans</li> <li>▪ Site schematics</li> <li>▪ Signage</li> <li>▪ Press releases</li> <li>▪ State-level D-SNAP policy guidance</li> <li>▪ Operations handbooks, including detailed process documents for local office staff</li> <li>▪ Listserv communications</li> <li>▪ D-SNAP applications and other forms*</li> <li>▪ D-SNAP outreach materials*</li> </ul>

\*Some materials were obtained before data collection from study States, and others were provided by States during the site visits.

FEMA = Federal Emergency Management Agency

### Interviews with staff from FNS National Office and Regional Offices

In February 2020, the study team conducted a two-part interview with staff in FNS’s Program Design Branch to explore the research questions through a Federal lens. Specifically, the study team learned about the role of the FNS National Office in D-SNAP, obtained background information on the selected D-SNAPs, and discussed high-level lessons learned and best practices. Findings from the interview were used to inform site visit protocol development.

#### Federal Staff Interview Topics

- FNS roles in D-SNAP
- D-SNAP planning
- Needs assessment and D-SNAP request
- D-SNAP operations
- Program integrity
- Challenges, best practices, and lessons learned

In January and February 2022, the study team conducted interviews with FNS Regional Office staff in the Southeast (North Carolina and Tennessee), Southwest (Louisiana), and Western (Oregon) Regions to learn about their role in D-SNAPs and gather information on challenges, best practices, and the D-SNAPs of interest. Findings from the interviews were used to help prepare site visitors for their site visits.

In February 2022, the study team interviewed staff from the Retailer and Issuance Policy and Innovation Division to learn about the use of optional disaster response waivers (i.e., hot foods, timely reporting, mass replacements). In May 2022, the study team interviewed staff from the Civil Rights Division to discuss civil rights as they pertain to D-SNAP. See appendix B for interview protocols.



## Site visits

Between February and April 2022, the study team conducted virtual and in-person site visits to the four study States. Virtual site visits were completed using videoconferencing software. Each site visit included semi-structured interviews with staff at State agencies, local offices, and other stakeholders.

### Site Visit Interview Topics

- D-SNAP planning
- Needs assessment and D-SNAP request
- D-SNAP site selection and staffing
- D-SNAP application processing
- D-SNAP public awareness campaigns
- Program integrity
- Closeout and reporting
- Challenges, best practices, and lessons learned

**Semi-structured interviews.** The study team created four semi-structured interview guides for different audiences: SNAP State agency, local office director, local office staff, and stakeholder (see appendix B). The interviews sought to develop a comprehensive understanding of the State’s approach to D-SNAP planning and the procedures, successes, challenges, and lessons learned associated with implementation and operations of the selected D-SNAPs. Topics covered in each interview are presented in the text box. Because of the impact of the COVID-19 pandemic on D-SNAP operations in three of the four study States, the study team modified some questions in the interview guides to capture information on the use of remote (i.e., virtual) application, eligibility verification, and benefit issuance. Table 2.3 describes the type of visit and the interviews completed with each State.

**Table 2.3. Site Visit Details and Interviews Completed**

State	Type of Visit	Interviews Completed
Louisiana	Virtual: All interviews were conducted virtually	<ul style="list-style-type: none"> <li>▪ Two interviews with SNAP State agency staff</li> <li>▪ One interview with local office supervisory staff</li> <li>▪ One interview with local office frontline staff</li> <li>▪ Three interviews with stakeholders (i.e., one emergency management agency, one nonprofit, one contractor)</li> </ul>
North Carolina	Hybrid: All State-level interviews and one community partner interview were conducted virtually; all other interviews were conducted in person	<ul style="list-style-type: none"> <li>▪ One interview with SNAP State agency staff</li> <li>▪ One interview with the former State SNAP director who was in the role when the disasters occurred</li> <li>▪ Two interviews with county management<sup>a</sup></li> <li>▪ Two interviews with local office supervisory staff</li> <li>▪ Two interviews with local office frontline staff</li> <li>▪ Three interviews with community partners (i.e., two county emergency management agencies and one community-based disaster response organization)</li> </ul>
Oregon	Virtual: All interviews were conducted virtually	<ul style="list-style-type: none"> <li>▪ One interview with SNAP State agency staff</li> <li>▪ One interview with local office supervisory staff</li> <li>▪ One interview with local office frontline staff</li> <li>▪ Two interviews with stakeholders (one emergency management agency and one community partner that hosted off-site SNAP staff)</li> </ul>
Tennessee	Hybrid: All State-level and stakeholder interviews were conducted virtually; all other interviews were conducted in person	<ul style="list-style-type: none"> <li>▪ Two interviews with SNAP State agency staff</li> <li>▪ Two interviews with local office supervisory staff</li> <li>▪ One interview with local office frontline staff</li> <li>▪ Three interviews with stakeholders (i.e., one emergency management agency, one EBT vendor, and one SNAP State agency former staff)</li> </ul>

<sup>a</sup> North Carolina is a county-administered State. The study team conducted interviews with county management in Cumberland and Guilford counties.

**Observations.** For hybrid site visits in North Carolina and Tennessee, the study team used a structured observational protocol to assess the D-SNAP site(s) and disaster area. The observations provided context for the interview findings and enabled the study team to develop a firm understanding of the flow of participants through the D-SNAP site and the extent of the damage from the disaster. The study team used a checklist and took detailed notes during each observation.

## 2. Qualitative Data Analysis

The study team synthesized data from documents and interviews to provide a comprehensive description of the selected D-SNAP(s) and determine best practices for developing annual D-SNAP plans and implementing and operating D-SNAP for a variety of disaster types.

### *State-specific case study analysis*

The study team developed State-level case studies to assess the implementation and operation of D-SNAPs and document each State's approach to protecting program integrity (objectives 1 and 3).

Initially, the study team reviewed publicly available and FNS-provided documents and abstracted relevant information into an Excel workbook and an NVivo database. Data were used to build a summary profile of each D-SNAP and were reviewed by the site visitors in preparation for site visits. The team analyzed additional documents received over the course of the site visit in conjunction with interview and observation data.

After each site visit, the study team reviewed and abstracted information from interview transcripts, onsite observations, and supporting documents. The team summarized key site visit takeaways and met regularly to discuss common and distinct insights gathered from each respective site visit. These procedures helped the study team identify themes and describe each State's approach to (1) D-SNAP planning; (2) drafting and submitting a D-SNAP waiver request and needs assessment; (3) site selection; (4) staffing; (5) public awareness campaigns; (6) program integrity; (7) the D-SNAP application process (e.g., client flow, eligibility determination, EBT card issuance); and (8) daily and final reporting.

### *Analysis of cross-cutting best practices, lessons learned, and high-level challenges*

To determine best practices for developing annual disaster plans and implementing and operating D-SNAP across a variety of disasters and circumstances (objectives 4 and 5), the study team coded interview transcripts and State D-SNAP annual plans in NVivo 12. The team created two coding schemes: one for the transcripts and a second one for the annual D-SNAP plans. Coding schemes reflected the research questions and study objectives. Study team members worked iteratively, first coding one document and conducting interrater reliability checks to examine consistency, then reviewing and revising coding as needed. After reaching an agreement, team members coded the remaining plans and transcripts. Once the coding was complete, the study team reviewed and analyzed the coded data to identify best practices, challenges, and lessons learned.

## B. Quantitative Data Collection and Analysis

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The quantitative data analyses focused on (1) D-SNAP and SNAP participant and household characteristics and (2) geospatial assessment of D-SNAP enrollment patterns.

## 1. Quantitative Data Collection

The quantitative data collection included administrative data from the four study States and extant data sources. Upon receiving OMB clearance, the study team requested data files from participating States' SNAP and D-SNAP eligibility systems. States provided test files, which were evaluated using a set of diagnostic procedures. After addressing any issues emerging from this process, each State provided full files with all available data. States varied in the number of files they provided based on whether the State operated unified or separate eligibility systems for D-SNAP and SNAP and the size of their caseloads. The study team documented situations where a State could not provide a requested data element. Universal cleaning procedures were conducted; additional State-specific cleaning procedures were implemented as needed. Appendix A provides additional details.

Each State provided caseload data for D-SNAP and SNAP participants for the 3 months immediately prior to, the month of, and the 6 months after the D-SNAP. Specific data collected for each of the three analyses are described below.

### *Administrative SNAP/D-SNAP data*

Each of the four study States provided caseload data for D-SNAP and SNAP participants. The data included variables on household composition (e.g., household size; race/ethnicity; presence of a child, an older individual, or a person with disabilities in the household); economic characteristics (e.g., gross income,<sup>6</sup> employment); and a household's benefits amounts for D-SNAP, SNAP, SNAP supplement (if provided), and SNAP replacement.

The study team also used Rural-Urban Commuting Area (RUCA) codes<sup>7</sup> (WWAMI Rural Health Research Center, n.d.). These codes were merged into each State's files based on the residential ZIP Code to classify each household as urban, large rural, or small rural. State D-SNAP materials were also used to identify D-SNAP counties for each State.

### *Geospatial analysis data*

The study team obtained county and census tract shapefiles from the U.S. Census Bureau. D-SNAP household addresses were included in administrative datafiles, and D-SNAP distribution site addresses were provided by SNAP offices within States. In-person application sites were available for North Carolina and Tennessee; Oregon and Louisiana had transitioned to virtual operations because of the COVID-19 pandemic and did not set up in-person sites.

## 2. Quantitative Data Analysis

The study team used administrative and extant data to examine the demographic and geospatial characteristics of D-SNAP households compared with SNAP households (objective 2). Analyses were conducted separately for each disaster. Appendix A presents a more detailed methodology.

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<sup>6</sup> The D-SNAP in Tennessee did not record gross income.

<sup>7</sup> Information on the three-category coding scheme is available at <https://depts.washington.edu/uwruca/ruca-uses.php>

### **Administrative SNAP/D-SNAP data analysis**

The study team produced descriptive statistics summarizing household composition, economic characteristics, and case characteristics of D-SNAP households and comparing those with households receiving SNAP benefits during the month(s) of the D-SNAP. Specifically, the reported statistics include—

- ▶ Comparison of (1) D-SNAP households, (2) SNAP households in the D-SNAP ZIP Codes, and (3) SNAP households outside the D-SNAP ZIP Codes in the same State: This table was created for each of the five D-SNAP operations evaluated in the study.
- ▶ For States that issued SNAP supplements in response to the disaster, a comparison of D-SNAP households to SNAP households receiving supplements and households that did not receive supplements: Disasters that occurred during the COVID-19 pandemic (Hurricane Laura in Louisiana; wildfires in Oregon) did not issue disaster-related supplements because COVID-19 waivers were in place, resulting in all households receiving the maximum allowable benefits for household size.
- ▶ For Oregon, a comparison of D-SNAP households that enrolled in SNAP within 6 months of the D-SNAP operation and households that did not enroll in SNAP in the same period: No other State had data for this comparison.<sup>8</sup>

All variables were harmonized across D-SNAP and SNAP caseloads within each State. The study team further attempted to harmonize variables across all disasters, although differences in how the data were collected and recorded led to differences in how a few variables (e.g., race, income) were constructed across States.

### **Geospatial analysis**

Geospatial analyses were performed using Esri's ArcGIS Pro 3.0 software to create three maps. First, county-level D-SNAP status was mapped, along with D-SNAP sites and disaster path (e.g., hurricane) where available, to help describe the disaster and D-SNAP availability after the disaster. Next, County Federal Information Processing System codes were used to join across datasets, and ArcGIS Pro's World Geocoding Service was used to assign latitude and longitude coordinates to provided D-SNAP site addresses.

Household data were geocoded using ArcGIS and summed to display the number of enrolled households in each census tract; this information was used to create heat maps of household enrollment in D-SNAP for each State. For States that conducted an in-person D-SNAP, we also produced a map indicating average distance of households from an enrollment/distribution site. To create the maps describing the distance of households to an enrollment/distribution site, households and addresses were geocoded in the geographic information system (GIS), and the shortest planar distance in miles was calculated between households and the nearest site. To display this graphically, buffers of 1, 5, 10, and 25 miles were created around the enrollment sites; the maps indicate the percentage of households within each buffer ring.

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<sup>8</sup> Louisiana, Oregon, and Tennessee used different eligibility systems for SNAP and D-SNAP. They also did not collect any common identifiers that could be used to link D-SNAP participants to later SNAP participation.

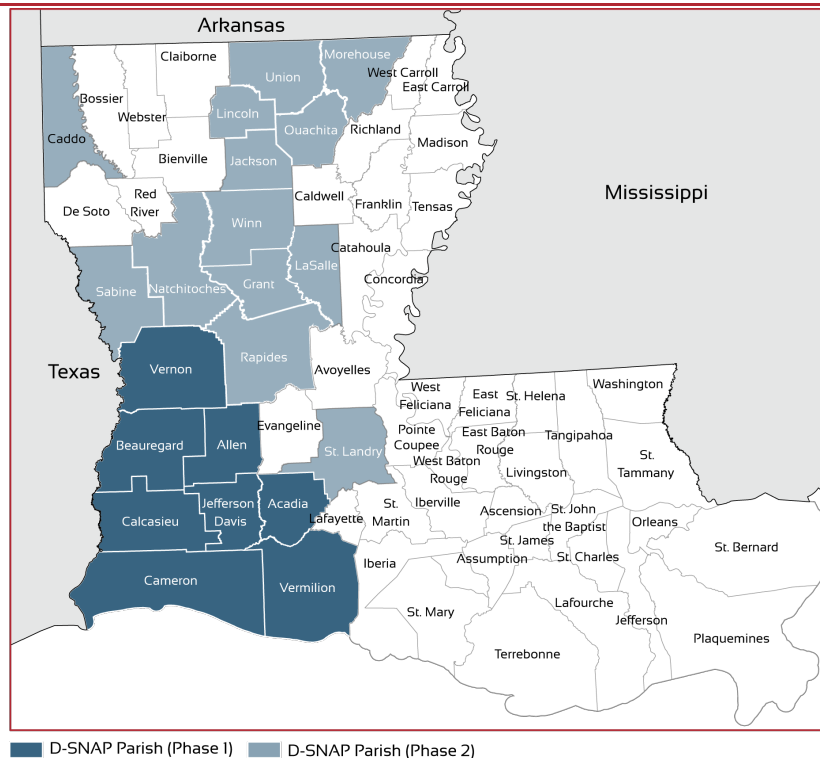
## Chapter 3. Louisiana Case Study

The case study assessment of Louisiana’s D-SNAP response to the 2020 Hurricane Laura incorporates qualitative and quantitative findings. Qualitative findings are based on interviews conducted virtually over a 4-day period in March 2022. The study team interviewed State agency staff, one local office SNAP director, one group of local SNAP office staff who worked together during Hurricane Laura as a virtual team, one stakeholder from the Governor’s Office of Homeland Security and Emergency Preparedness (GOHSEP), one stakeholder from the State’s call center contractor (YoungWilliams), and one stakeholder from a nonprofit focused on how public policy affects Louisiana's low-to-moderate-income families (Louisiana Budget Project). In total, the study team conducted seven individual and group interviews ranging from 1 to 2 hours each. Quantitative findings are based on SNAP and D-SNAP administrative datafiles received from the State’s information technology contractor. The datafiles contained information on household composition, economic characteristics, benefit amounts, and geographic location.

### A. Hurricane Laura (2020) Overview

Hurricane Laura made landfall as a Category 4 storm on August 27, 2020, near Cameron, Louisiana. The storm weakened to a Category 2 storm as it moved north through Louisiana. The President issued a major disaster declaration on August 28, 2020; across the State, 21 parishes operated D-SNAP in response to Hurricane Laura (see figure 3.1).

**Figure 3.1. Map of D-SNAP Parishes, 2020 Hurricane Laura, Louisiana**

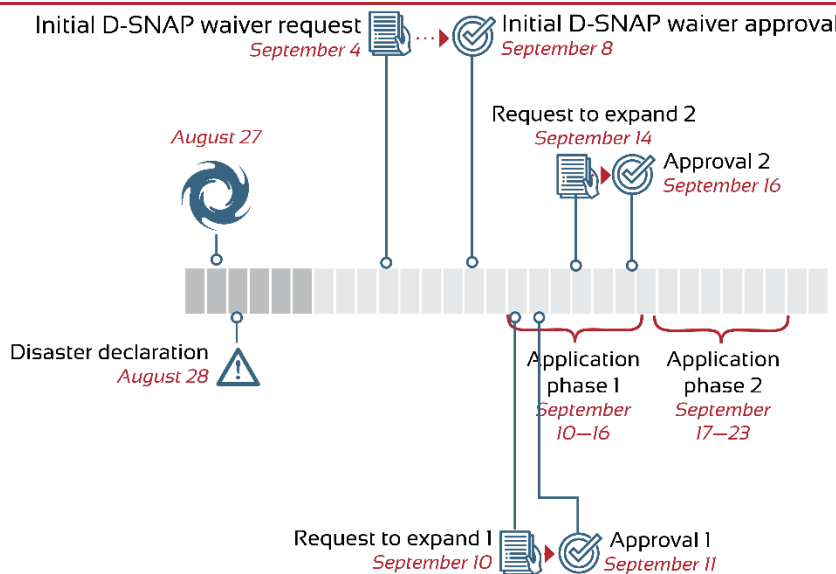


## 1. Timeline of Events

On September 4, 2020, the Louisiana Department of Children and Family Services (LA-DCFS) submitted a D-SNAP waiver request to FNS for 16 parishes eligible for IA and severely affected by Hurricane Laura; FNS approved this request on September 8, 2020. LA-DCFS requested and FNS approved two expansions to the D-SNAP to include five additional parishes (see figure 3.2).

LA-DCFS operated the D-SNAP in two phases to manage staff and resources. The first phase included 9 parishes, and the second phase included additional 12 parishes. The 7-day application periods began on September 10 and September 17, 2020, for the first and second phase, respectively (see figure 3.2). The resulting D-SNAP served 126,823 clients from 41,936 households. Eligibility workers processed 69,234 applications and issued \$37,228,821 in D-SNAP benefits.

**Figure 3.2. Timeline of the D-SNAP Operation, 2020 Hurricane Laura, Louisiana**



Source: Louisiana postdisaster review report

## B. General Planning

Louisiana’s annual D-SNAP plan is drafted by a team of two or three LA-DCFS staff at the State level; staff at the local level are not involved in developing the annual D-SNAP plan. The annual D-SNAP plan designates LA-DCFS as the agency responsible for filing a disaster application (i.e., D-SNAP waiver request) with FNS in writing to begin preparing for a D-SNAP. The same agency is also responsible for implementing and operating a D-SNAP. The plan notes Federal agencies, notably FEMA and FNS, have the responsibility to supplement the State’s effort in a D-SNAP.

The annual D-SNAP plan is designed to respond to the worst-case scenario (i.e., Category 5 hurricane). Respondents from LA-DCFS noted that planning for a worst-case disaster ensures their preparation will meet the needs of Louisianans in the aftermath of a disaster. The annual D-SNAP plan calls for LA-DCFS to work with emergency preparedness directors in the affected parishes for necessary support services, such as providing staff and working with the local sheriff’s department to provide security. During interviews, a participant from GOHSEP noted the State had learned that bringing in large numbers of

staff and setting up large-scale operations without first coordinating with local community services produces unnecessary logistical hurdles.

The annual D-SNAP plan includes Cooperative Endeavor Agreements (CEAs) for sites to conduct D-SNAP in all 64 parishes; State contracts are maintained with vendors to provide logistical support for D-SNAP sites. The CEAs are prearranged contractual agreements that allow the State access to physical space and equipment in the event of a disaster declaration. The CEAs included an array of contractors/vendors that provided tents, chairs and tables, portable fans, pallets of water, and internet service where necessary. Prior to the COVID-19 pandemic and the shift to virtual D-SNAP, the CEAs were an integral part of the annual D-SNAP plan that enabled LA-DCFS to quickly mobilize and set up sites for D-SNAP.



**Best Practices for General Planning:** Develop written agreements with sites, contractors, and vendors necessary for D-SNAP. Incorporating these CEAs into the annual D-SNAP plan simplifies the logistics of an in-person D-SNAP.

LA-DCFS does not make changes to the annual D-SNAP plan every year. After each D-SNAP, the emergency preparedness team drafts the After Action Report and develops recommendations designed to promote process improvement. Changes to the annual D-SNAP plan are initiated based on actionable findings in the After Action Reports.

One of the last major changes to the annual D-SNAP plan occurred in 2012, when the State transitioned from paper-and-pencil applications to an online application system. This change facilitated preregistration and real-time eligibility verification to ensure the client could receive an EBT card on site if approved. Following Hurricane Laura and the 2020 hurricane season, the State began writing its annual D-SNAP plan predicated on implementing and operating virtual rather than in-person D-SNAPs. State agency staff noted they were not encouraged by FNS to draft their annual plan for a virtual D-SNAP, but LA-DCFS found operating a virtual D-SNAP saved money, reduced logistical challenges (e.g., transportation, housing), and was easier on staff. Currently, Louisiana is developing a hybrid approach. This approach is still largely virtual but provides in-person services for clients who are older, have disabilities, or face other challenges accessing virtual services.

## 1. Relationships With Other Stakeholders

Because Louisiana experiences frequent disasters, the emergency response infrastructure includes several key stakeholders. LA-DCFS has a history of collaborating effectively with GOHSEP; respondents from both organizations spoke highly of the interdependent and collaborative relationship between the two groups. State agency staff and a stakeholder from GOHSEP mentioned frequent (e.g., daily) calls to coordinate D-SNAP services during a disaster.

YoungWilliams, another stakeholder, is the State's call center contractor; LA-DCFS has worked with them since 2019. Their call center provides customer service representatives who handle preregistration and field general questions about D-SNAP and SNAP. YoungWilliams holds an annual training for call center staff who support Louisiana during a disaster. This training covers how to use the software to answer calls for D-SNAP applications. The respondent from YoungWilliams felt this training is an important part of the company's preparation to assist LA-DCFS during a disaster.

Louisiana also has relationships with SNAP offices in Texas and Oklahoma to provide support during periods of disaster. According to one State agency respondent, it is easier to bring in SNAP staff from other States than to train workers from other LA-DCFS offices because SNAP staff come to the D-SNAP with an understanding of the SNAP process. The annual D-SNAP plan includes a list of additional organizations within the State (e.g., Louisiana Public Service Commission, Feeding Louisiana) and at the national level (e.g., Food Research and Action Center) that support the State’s disaster response.



**Best Practices for Predisaster Planning:** Louisiana’s online preregistration system enables State residents to submit personal and household information before the onset of a disaster. The system reduces burden on residents in the immediate aftermath of a disaster and expedites eligibility verification to ensure the client receives an EBT card.



**Best Practices for Predisaster Planning:** Establish relationships with neighboring States who could provide SNAP staff to support large-scale D-SNAPs; staff who already understand the SNAP process may transition onto D-SNAP teams more easily than those unfamiliar with the SNAP process.

## C. Event-Specific Planning

Event-specific planning took on an added dimension during the 2020 hurricane season because of the COVID-19 pandemic and the resulting need to serve Louisianans remotely. The State adapted the procedures outlined in the annual D-SNAP plan and took steps to implement and operate its first virtual D-SNAP. State agency staff felt prepared for Hurricane Laura.

### 1. Estimating Need

LA-DCFS estimated the potential number of individuals and households that would apply for the D-SNAP following guidance in the D-SNAP toolkit. For this estimation, LA-DCFS staff identified the affected parishes (i.e., parishes where FEMA granted the IA declarations), estimated the number of eligible households using U.S. census data, and applied a multiplier. The State looked at data from Hurricanes Katrina and Rita because they affected many of the same parishes as Hurricane Laura. The State anticipated 145,000 D-SNAP applications for Hurricane Laura and received less than half this anticipated number. State agency staff thought this could be partially explained by high SNAP participation and flexibilities related to the COVID-19 pandemic.

For localized disasters like tornadoes or flooding, Louisiana estimates need at the ZIP Code or Census Block level. This practice began after a tornado hit New Orleans in 2017; for this disaster, DCFS worked with GOHSEP to use Census Blocks to focus on the affected area, which is a smaller unit than a ZIP Code. This estimation enables the State to operate a more targeted D-SNAP rather than making D-SNAP available to entire parishes for localized disasters. The State agency noted that providing the opportunity to apply for D-SNAP to entire parishes when the affected area is very small could result in unaffected individuals applying for D-SNAP. GOHSEP supports this effort by sending GIS mapping information to help LA-DCFS determine which ZIP Codes to target. For Hurricane Laura, LA-DCFS did not estimate need at the ZIP Code level because the damage was widespread.





**Best Practices for Estimating Need:** For localized disasters, focus disaster recovery efforts at a ZIP Code level rather than parish or countywide relief.

## 2. The D-SNAP Waiver Request

LA-DCFS requested permission to conduct a D-SNAP 8 days after Hurricane Laura made landfall. Respondents at the State agency felt the timing of the request was appropriate given the scope and impact of the disaster. State agency staff reflected that 8 days was a quick turnaround to make preparations to operate their first virtual D-SNAP, noting an extra day or two to prepare may have been helpful. LA-DCFS's initial request to conduct a virtual D-SNAP included details on the media campaign, the State's preregistration platform, and EBT card distribution. FNS approved the request with the following conditions:

- ▶ The State agency will have sufficient staff to conduct telephone interviews and augment staffing at the call center as needed.
- ▶ The State agency will have a designated phone number for D-SNAP applicants.
- ▶ The State agency will ensure all public communications and press materials provide clear, accurate, and updated information about application site locations and hours of operation.
- ▶ Commercial channels of food distribution have been restored in the requested areas, and sufficient numbers of authorized retailers are open and available to redeem D-SNAP benefits.

Following the initial D-SNAP request, LA-DCFS submitted two additional requests to extend the area served to include five additional parishes. FNS approved these requests with the same conditions. Because of lingering power outages and interrupted cellular phone service, the State requested an extension to the D-SNAP application period for households in nine parishes.

## 3. Other Waivers and Policy Flexibilities

LA-DCFS requested six other waivers for the Hurricane Laura D-SNAP: mass replacements, timely reporting of household food loss, hot foods, extended certification periods, a waiver to include credit card payments as allowable expenses, and a waiver to keep points of distribution (PODs) open for part of the D-SNAP.

Two of the six waivers—the waivers for credit card payments and to keep PODs open—are not conventional D-SNAP waivers. The first waiver permits Louisiana residents to include allowable (i.e., disaster) expenses purchased on a credit card, even if those expenses are paid at a later time. LA-DCFS learned through disasters that occurred in 2016 to include this waiver because it influences the eligibility determination. The second waiver helped ensure D-SNAP recipients did not experience a gap in access to food. Typically, D-SNAP is sequenced to begin after PODs close. However, LA-DCFS requested the waiver to allow PODs, centralized locations in a disaster area where survivors can pick up supplies (e.g.,

food and water), to overlap with D-SNAP because the State had to mail EBT cards. Keeping PODs open supported the gap between D-SNAP application and receipt of benefits.

*“We knew that...anybody that we certified on Monday, the first day, they weren't going to have benefits available to them for at least 3 days. So, instead of having to open D-SNAP on Monday and close the commodities Sunday night, we requested and FNS approved for us to keep the commodities open Monday, Tuesday, and Wednesday and close that Wednesday night. So, food was still available to people for those 3 days until they got their EBT cards.”*

—State agency staff



**Best Practices for D-SNAP Waivers:** Two novel waivers proved helpful to the Hurricane Laura D-SNAP. Waivers to keep PODs open for part of the D-SNAP helped ensure virtual D-SNAP applicants could access food and water until their EBT cards arrived by mail. Including credit card payments as allowable expenses provided a more accurate way of estimating participants' disaster-related expenses.

## D. Implementation

After FNS approved the D-SNAP waiver request, State agency staff began the process of adapting the in-person D-SNAP plan for a virtual D-SNAP, recruiting and training staff to work on the virtual D-SNAP, and disseminating the public awareness campaign.

### 1. Adaptation to Virtual D-SNAP

The shift to virtual implementation required LA-DCFS to use existing contract relationships in new ways. The State had to set up telephone and digital information systems to support remote work and manage the thousands of incoming calls. Louisiana had to develop new processes to verify applicants, issue EBT cards, and prevent fraud. To align technology with the virtual format, the State engaged the Office of Technology Service and the Office of Motor Vehicles (OMV). Through a data-sharing agreement with the OMV, clients' identity could be verified with LAWallet, a smartphone application that digitally represents Louisiana-issued State IDs or driver's licenses. The Governor waived the fee for this application, making it available for free to all Louisiana citizens. Louisiana also signed a data-sharing agreement with the Social Security Administration to allow State On-Line Query Internet (SOLQi), another identity verification tool, to interface with the D-SNAP system.

One of Louisiana's key implementation partners for the virtual D-SNAP was YoungWilliams, the State's call center contractor. In previous D-SNAPs, YoungWilliams provided customer service representatives to handle preregistration and field general questions about D-SNAP and SNAP. During the Hurricane Laura D-SNAP, YoungWilliams also helped the State set up a cloud-based automatic call distribution (ACD) system and issue equipment the staff could use to work from home. The ACD system enabled staff to log in from any phone to receive calls.



**Best Practices for Implementing a Virtual D-SNAP:** Proactively establishing partnerships necessary for D-SNAP (e.g., call centers) promotes smooth implementation.

As previously noted, Louisiana has been using an online preregistration system that enables clients to provide their information and have their identities verified before a disaster occurs for almost a decade.

Information in the preregistration system is used during the application and eligibility interview process. Even though Louisiana’s preregistration system was updated in 2020 and registration information was not saved from past disasters, residents were familiar with the registration process. Individuals who did not preregister or were unable to preregister (e.g., individuals without internet access) could provide all the necessary information for their D-SNAP application by phone. Applicants could make appointments for in-person interviews at a local office, if needed.

For program integrity and security purposes, Louisiana needed to acquire new EBT cards and update the system for issuing benefits for the virtual D-SNAP. Prior to virtual operations, Louisiana stocked prepinned and preactivated EBT cards; these EBT cards were appropriate for in-person D-SNAPs because benefits could be loaded, and cards handed directly to eligible clients. These EBT cards were not appropriate for virtual D-SNAP because they could not be securely mailed. The State’s EBT vendor helped obtain new EBT cards that contained no cash value and could be mailed to D-SNAP clients without security concerns. Deloitte, the State’s information technology contractor, helped Louisiana set up its D-SNAP system to issue benefits remotely for the virtual D-SNAP without swiping an EBT card.



**Key Considerations for Implementing Virtual D-SNAP:** EBT cards that are prepinned and preactivated for in-person distribution cannot be securely mailed. Mailing EBT cards for virtual operations may require different EBT cards and changes to the D-SNAP system to enable remote benefits issuance.

## 2. Staffing

The COVID-19 pandemic added to the State’s staffing challenges. Louisiana had to consider factors such as health and internet capacity when deciding who could and could not work remotely. For example, many staff were directly affected by Hurricane Laura, lived in areas affected by power outages, or had family members who were affected.

Unlike working at a D-SNAP site, staff working remotely from their homes had access to their regular day-to-day work assignments. They reported being expected by their supervisors to complete other tasks when the D-SNAP had slow periods. Local office staff shared that these expectations made balancing their workloads challenging.

*“We had to recognize that not only does [the COVID-19 pandemic] and the disaster affect the general population, but our staff is part of the general population, and so they’re affected by these things as well, and they’re trying to work, and do their jobs, and take care of their families, and get their houses rebuilt, and so ... it’s a real delicate situation.”*

—State agency staff



**Key Considerations for Staffing:** Day-to-day work does not stop during a D-SNAP, and staff struggled to manage these increased demands. Staff may also be personally affected by the disaster.

The State assigned almost all staff (up to 1,000) to work on the D-SNAP and maintained minimal staffing for regular SNAP work. Because of the virtual format, staff could work even if they relocated outside the State. State agency staff explained this flexibility was beneficial for both the State agency and the workers. Although only LA-DCFS staff worked on the Hurricane Laura virtual D-SNAP, this flexibility enabled staff from other States (e.g., Texas) to support subsequent virtual D-SNAPs in Louisiana.

*"We did have a small handful of staff that...even though they had to relocate, they were wanting to work just to get their mind off of everything.... Best part about it is [they] could be in a different part of the State, even in Texas, and they were able to log in, and they got on the phone, and they were able to take calls...because they still...wanted that extra money to help them...with the rebuilding and everything else. And so that was the great thing. They didn't have to travel back into the State to go to a site."*

—State agency staff



**Best Practices for Staffing:** The virtual format facilitates increased flexibility for staffing: Staff who need to relocate can work on the D-SNAP, and staff from other States can contribute if needed. Arrangements with staff from other States should be made proactively to ensure staff are trained on the State's systems before a disaster occurs.

### Staffing structure

At the onset of the Hurricane Laura D-SNAP, the State assembled staff into 24 teams of 40–45 individuals, most of whom worked remotely. These teams included a team lead, eligibility workers, two policy subject matter experts (SME), and two or three fraud and quality control staff. Policy SME staff answered policy-related questions and trained staff. Fraud and quality control staff served as quality assurance and handled fraud-related questions and concerns. Support staff (e.g., SMEs, monitors) worked across two teams. During the second phase of the D-SNAP, the State added a monitor to each team who supported the team leads by monitoring staff's productivity.

However, State and local agency staff suggested teams could have been assembled more strategically. They felt teams were too large and spread across the State, making it difficult for the team leads to manage their teams. Adding the monitor role to each team helped address this challenge. For subsequent virtual D-SNAPs, the State enacted a more localized approach to building teams, enabling team leads to manage staff they typically worked with.

*"We're gonna slap 40 people on a team, and then we'll start a new team. ... So we did that until we had put everybody on the team, and we quickly realized that 40 was too many on a team, especially considering they were using a system and a phone that they had never used before. And we had people just from all over the place ... jumbled on teams, and we had team leads who were leading teams of people that they had never laid eyes on and didn't know ... anything about. It's easier to handle a team when you know the staff and you kind of know how they work. ... So we did it very haphazardly"*

—State agency staff



**Key Considerations for Staffing:** Team leads were challenged to manage large teams of staff they were not familiar with. Assemble teams geographically to enable familiar teams to work together.

### Staff communication

D-SNAP teams communicated among themselves through chat rooms and morning huddles. Skype chat rooms allowed eligibility workers to post questions, and the chat room functionality preserved conversation histories, making them visible to other team members with similar questions. The team triaged questions into three topics—policy, data, or fraud—and directed questions to the appropriate team member. Support staff could observe eligibility workers’ calls without interrupting or join the calls and coach the eligibility worker without the client hearing. Using Skype also enabled eligibility workers to screen share with support staff when needed. Local office staff emphasized that this technology helped the virtual D-SNAP operate smoothly.

*“One of the things I noticed having worked both an in-person and a virtual D-SNAP is when you're helping people at an in-person D-SNAP...you've got like 10 people in 20 different places raising their hand. And you're one person. You got to walk across and answer a question, and everybody's kind of waiting their turn, and it's slow. But on the virtual D-SNAP, they put their question in chat, and the policy person answers right away. And so I think that was an improvement over...the in-person D-SNAP.”*

—Local office staff

Morning huddles occurred daily and included two teams. During these meetings, the team leads provided updates and statistics from the previous day. Policy experts explained common questions from the previous day or provided policy updates, fraud and quality control staff also shared updates, and eligibility workers had an opportunity to ask questions. Local office staff praised these meetings as an opportunity “to get everyone on the same page.” In preparation for the morning huddles, team members in leadership roles (i.e., team leads, policy SMEs, and fraud and quality control staff) met at the end of each day to discuss issues and resolutions and identify information to bring to morning huddle.

The State also used the Incident Command System (ICS) while operating the Hurricane Laura D-SNAP. The State agency staff explained the ICS provides a common hierarchy and helps keep activities on track, especially when the State is working with other partners. Staff are trained on the ICS each year. Louisiana also relied on a “command room,” which included key staff from the State, the Office of Technology Service, and technical assistance. Gathering these key staff promoted streamlined communication and decision making. Louisiana initially deviated from the ICS for the virtual D-SNAP because of changes in staff but quickly returned to this structure. Historically, Louisiana used the ICS for in-person D-SNAPs and recommended adhering to the ICS for the virtual D-SNAPs.



**Best Practices for Implementation:** The team’s policy and fraud and quality control staff facilitated the application process. Through Skype chat rooms, these staff helped answer eligibility workers’ questions efficiently. Through morning huddles, teams were kept up to date on common issues, resolutions, and D-SNAP progress. Team members in leadership roles met at the end of each day to discuss issues and resolutions and identify information to bring to the morning huddle. At a higher level, using a command room and adhering to the ICS also supported the D-SNAPs success.

## Training

The State requires all LA-DCFS staff to complete the annual computer-based training by June 1 (i.e., before the beginning of the hurricane season). This training covers D-SNAP policies and systems. Local staff noted they did not find the annual training helpful because they had seen it so many times; many of these staff reported working for LA-DCFS for more than 20 years.

D-SNAP staff also receive disaster-specific training prior to the launch of a D-SNAP operation. This training provides detailed information about the disaster, dates, and affected parishes. For Hurricane Laura, the disaster-specific training was instructor-led by a policy SME from LA-DCFS. Staff found this training more valuable than the annual training because it covered topics such as the composition of the disaster response team, application process, strategies for handling SNAP households, eligibility requirements, benefit issuance, and case management. The training materials included a set of cheat sheets staff could use, for example, while on the phone. The local office staff noted these quick-reference documents were easier to navigate than the full training PowerPoint. A separate training covered the D-SNAP Worker Portal (i.e., Salesforce).

### 3. Public Awareness Campaign

The Joint Information Center within GOHSEP coordinated the public awareness campaign. The State used press releases, mass texting (via the mass notification platform “Rave”), radio, television, and social media to share information about the D-SNAP. Information about the D-SNAP was also available on the LA-DCFS website, Facebook, Twitter, and through LA-DCFS’s customer call center. State agency staff also noted that following Hurricane Laura, the Governor held daily addresses, which included information about the D-SNAP. Most of the individuals interviewed felt the public awareness campaign was a success. The State observed spikes in call volume following campaign messaging (e.g., texts), which indicated the campaign was reaching people.

The Louisiana Budget Project, a local nonprofit, helped informally amplify D-SNAP messaging. It reposted information on social media, shared information through SNAP application assisters, and responded to media requests. The Louisiana Budget Project also coordinated translation of D-SNAP materials through its partners. The State communicated with Red Cross, food banks, and other stakeholders to amplify messaging.

The State also used its 211 customer communication system as an additional resource for providing up-to-date D-SNAP information. 211 is a telephone number available to Louisianans 24/7, 365 days a year; it serves as a single access point for callers to get information about health and human services available in their community. A respondent from GOHSEP explained 211 was an important resource because Louisianans were already familiar with it.

*“So day-to-day we’re messaging our citizens, now call 211 if you need something, right?... So by the time we get to D-SNAP, people already know to call 211. And then there’s a text feature ... so if you text Louisiana D-SNAP to this number, it’ll automatically tell you what is eligible, it’ll tell you what day the alphabets are. So I think the best practice is to work with your jurisdictions of 211 providers because, like I said, the community is conditioned already to know that number and what it’s for. So just if you coordinate with them, they can actually answer a lot of your questions.”*

—Stakeholder staff (GOHSEP)



**Best Practices for Public Awareness Campaign:** Leverage 211, or other familiar resources, as an additional way for the public to get information about D-SNAP.

#### 4. Role of Partners and Other Stakeholders

As previously described, the role of partners, such as YoungWilliams and GOHSEP, was critical to Louisiana’s ability to adapt to a virtual D-SNAP. However, one of the biggest impacts on the State’s response to Hurricane Laura was the reduced number of partners and stakeholders involved compared with a conventional, in-person D-SNAP. The switch to a virtual D-SNAP alleviated the need to coordinate with support groups such as transportation, housing, communication, and public works. Staff from the State agency noted that coordinating with fewer groups saved millions of dollars because, without a physical site, they did not need to pay for expenses such as tents, water, snacks, or security. The State also did not need to pay for staff’s travel, lodging, and meal expenses. A stakeholder from GOHSEP pointed out that operating a D-SNAP virtually alleviated the competition for usable recovery space postdisaster.

*“From emergency management standpoint, it's not as labor intensive for local and other State partners because there's no security, there's no feeding contract...there's not that logistical push. And what I find after a lot of disasters, such as at the scale of Laura, is you're competing for recovery spots per se. Right? So you're competing for, I need a place for sheltering to bring my people back to the local jurisdiction.... Sometimes after a disaster such as Laura, you are trying to run so many different operations that would take a [physical space]...so having something that was not physical and labor intensive was a plus for us.”*

—Stakeholder staff (GOHSEP)



**Best Practices for Implementing a Virtual D-SNAP:** Compared with an in-person D-SNAP, operating a virtual D-SNAP resulted in massive cost savings. These savings are attributable to the virtual format eliminating site-related expenses and most staff expenses.

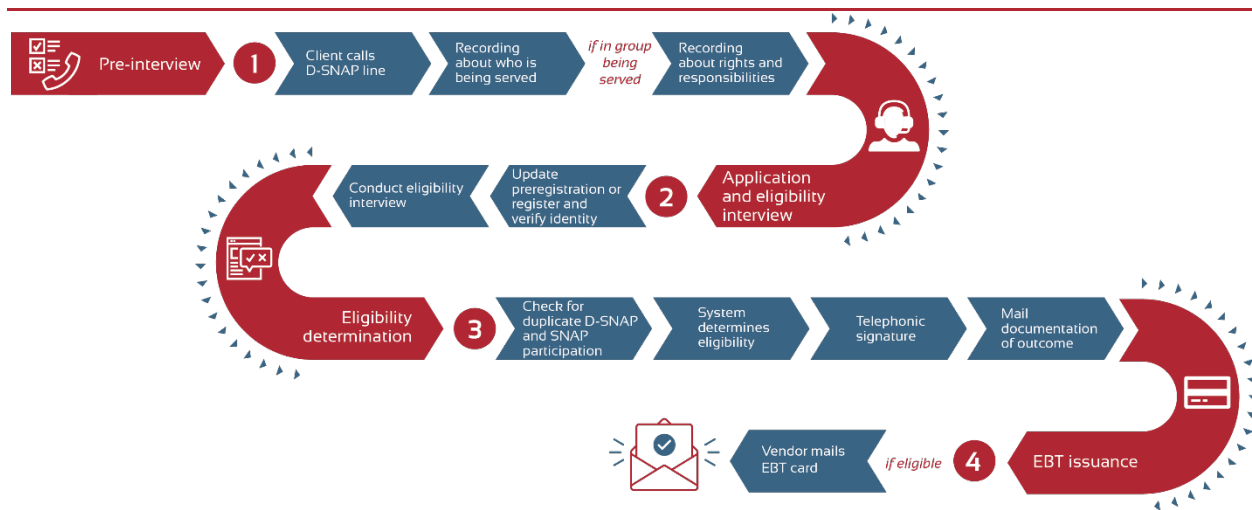
## E. Operations

Operating a virtual D-SNAP required Louisiana to adapt the D-SNAP application process and EBT card issuance. Ensuring program integrity and accommodations for special populations with the virtual format were important considerations.

### 1. Application Process

The application process was virtual and remote for staff and clients; most eligibility workers conducted interviews from their homes. Figure 3.3 summarizes the D-SNAP application and benefit issuance process.

**Figure 3.3. Louisiana’s Virtual D-SNAP Application Process**



### Preinterview

The application process was initiated when a client called the D-SNAP line. They first heard a recording identifying which groups (alphabetic by last name) were currently being served. If they were in the identified group, they listened to a recording on rights and responsibilities and then entered the queue to speak with an eligibility worker. The ACD phones distributed calls to eligibility workers. Wait times to reach an eligibility worker varied by time of day. State agency staff noted anecdotally that call volume also seemed to correspond with text alerts and the Governor’s daily addresses. Over the course of the D-SNAP, eligibility workers took 101,030 calls (88,773 were answered; 10,219 were abandoned). The average wait time to reach an eligibility worker in phase 1 was about 22 minutes. This wait time was longer than expected or considered acceptable by the State and resulted from technical difficulties on the first day. The average wait time to reach an eligibility worker in phase 2 was just over 2 minutes. Local office staff noted that although clients had to wait to reach an eligibility worker, waiting on the phone may be more tolerable than waiting in line at a site.

*“I think that we probably reached a lot of people ... served a lot more people than we would at a disaster site, D-SNAP site, in person because there are a lot of people that I think would not come down to a site and wait to be seen in person by us, and they had the convenience of doing it over their phone. I know if they had to wait for an hour or 2 or longer for us to answer, it ... probably ... didn't make them too happy, especially if they waited all that time and then found out that they were denied.”*

—Local office director



Eligibility workers used headphones in their homes to afford privacy to clients when conducting interviews. Local staff thought this was an improvement from in-person D-SNAPs, where many interviews were conducted in close proximity. Clients could determine their level of privacy based on where they called from.

*"I really think the client has a better level of confidentiality as a virtual as opposed to on site because when we were on site...you would have three people at one table...whereas I can choose if I'm the client to go in my room; I could be in my car; if I'm at work, I can go...to the break room.... As a client, I would be able to choose my level of confidentiality."*

—Local office staff

### **Application and eligibility interview**

During Hurricane Laura, Louisiana used the Salesforce cloud-based platform as its SNAP eligibility system. This system provided eligibility workers with the information they needed to conduct interviews and verify identities. If a client preregistered (i.e., provided their name, social security number [SSN], and date of birth via the preregistration system), the eligibility worker went into the system to verify and update their information. If the client did not preregister, the eligibility worker entered their information as a new case and attempted to verify their identity using one of two verification tools: (1) LA wallet, the OMV application; or (2) SOLQi, an interactive application used for verifying SSNs. To further support verification, the State created an “email team” to request proof of identity via secure email for clients that could not be verified through other methods.

Regardless of the eligibility worker’s ability to verify a client’s identity, they continued with the interview. The system determined eligibility within seconds based on income, resources, and disaster-related expenses. If the system deemed the client eligible, the client was informed, and the EBT team processed their EBT card. A telephonic signature was used at the end of all applications, regardless of outcome. By the end of the day, all clients were mailed documentation of their certification outcome.

*"So, it's not only better for our staff, but I wanna just reflect back that it's also better for the public because they don't have to. They're already going through so much, and now we expect you to come and stand in line sometimes for 2 or 3 hours when you can be in the comfort of, you know, a loved one's home or a hotel or something, if you had it. Doesn't matter where you are, we can still help you."*

—State agency staff

## **2. EBT Issuance**

If a client was deemed eligible, their case was passed to the EBT vendor Inmar Inc., to process the EBT card. In the early days of the D-SNAP response, EBT cards were distributed to clients via FedEx. However, damage to the FedEx distribution center caused by Hurricane Laura led to delayed card delivery. To help expedite the delivery of EBT cards, State agency staff started working at FedEx. The State soon discovered that U.S. Postal Service (USPS) was faster and less expensive than FedEx and began mailing EBT cards via USPS instead. Cards mailed via USPS were delivered in 2–5 days. Disaster-related curfews were also a barrier to timely delivery. The State worked with the mayor of Lake Charles to exclude FedEx drivers from the curfew.



**Key Considerations for EBT Issuance:** Disasters may affect mail services, creating logistical difficulties for mailing EBT cards in the wake of a disaster.

### 3. Program Integrity

Louisiana’s virtual process efficiently separated eligibility and card/benefit issuance, resulting in fewer program integrity challenges for the Hurricane Laura D-SNAP than previous in-person D-SNAPs. One respondent noted that clients occasionally hung up when they found out their interview was recorded, suggesting this security measure may deter fraud. If an eligibility worker thought a client was attempting fraud, they could add a fraud and quality control worker to the call. Some clients who were denied tried to call and apply a second time, but eligibility workers could access their case files and note they had already applied; having real-time access to the Salesforce system helped reduce improper payments.

*“Well, the interview itself was recorded. So that was one of the things that deterred fraudulent behavior. We did notice that we had some people that, once they realized they were recorded, they hung up. So some of that was there; then it made it easier when reviewing it to go back and listen to the interview. So I think all of that played into us ensuring that we had less fraud as well.”*

—State agency staff

The State also created a team to review the denied cases on a rolling basis. By the end of the D-SNAP, almost all denied cases were being reviewed. Because of this process, the State believed that most of the denials were correct.

The Salesforce D-SNAP system automatically checked for duplicate participation by interfacing with the Louisiana Integrated Technology for Eligibility (known as LITE) system and existing clients in the D-SNAP system. Issues related to duplicate participation were uncommon and resolved on a case-by-case basis by fraud and quality control staff or team monitors.

*“So between the fact that we had staff available listening to calls and then you had the staff who were reviewing the denials, I think we actually probably gave a better product as far as what was done. ... So I think that's one of the things that I could say was a big plus. ... I really do believe that the majority of the denials we know are true denials because of that.”*

—State agency staff

Two years after the D-SNAP, the State is still reviewing potential fraud cases. State agency staff explained these cases take a long time to finalize because they require a deep investigation. They could not share the results but acknowledged that although they believed the virtual D-SNAP came with fewer integrity challenges, some outright fraud was still present.



**Best Practices for Program Integrity:** Recording interviews may deter fraudulent behavior. The addition of fraud and quality control workers to calls helps address potential fraud proactively.

### 4. Civil Rights Protections

The virtual D-SNAP presented different challenges for special populations than a conventional in-person D-SNAP. One stakeholder shared that the deaf community and communities with disabilities had

concerns about communication and access in the virtual format. However, the State set up a telephone relay for clients with hearing impairments and allowed authorized representatives to complete the interview for those needing assistance. Clients could also make appointments for in-person interviews at a local office, if needed, but this was uncommon.

Similar to in-person D-SNAP, a language line was also available for clients who needed a translator. The local office staff noted interviews using a language line were longer than other interviews, and making this three-way connection was difficult. Despite these challenges, the local office reported that virtual D-SNAP was better, especially for using a language line, because in-person sites were noisy and made it harder to conduct the interview. Another stakeholder noted the virtual format was better than in-person for medically vulnerable populations who would have been at risk congregating in person. Ultimately, the communities' needs were met through accommodations such as the telephone relay and authorized representatives detailed above. Although the in-person and virtual formats have pros and cons depending on an individual's disability, the virtual format may be more accessible overall.

*“For the disability groups, there's pluses and minuses to [either format]. Right? So when you have a physical site, there's accessibility for people with mobility issues and the elderly—those are always an issue. But the virtual world overall was pretty helpful for people with disabilities who have the access, the wheelchairs, the elderly. But it became harder with people who were deaf [when they were] told that they had to call somebody.”*

—Stakeholder



**Key Considerations for Accessibility:** Communities with disabilities initially expressed concern about the virtual D-SNAP because it was unclear how these groups would be served. Include information about accessibility in all communications.

## F. Reporting and Closeout

Louisiana provided daily reports to FNS and completed extensive case reviews at the end of the Hurricane Laura D-SNAP.

### 1. Daily Reporting

Louisiana sent daily reports to FNS summarizing the approved and denied cases. FNS requested up to 400 cases (300 approved, 100 denied) for review, and Louisiana provided screenshots of the case summaries for these cases.

*“[FNS] would listen in on calls, and then they would call me and say, hey, I heard something that ... I didn't understand or I wanted to ask you about. So ... we had a lot of people since it was so new, and everybody was interested in it, we had a lot of ... fingers in the pie. So it was very involved.”*

—State agency staff

### 2. Closeout

Because the D-SNAP was virtual, closeout activities were minimal. At the end of the D-SNAP (September 23, 2020), parishes were closed in the Salesforce system. Parishes could be temporarily reopened in the system for 7 days if eligibility workers received identity verification. A few days after the D-SNAP ended,

the State agency reported the number of individuals and households served to FNS but acknowledged these numbers were not final because of clients winning appeals or providing verification after the D-SNAP ended. Local office staff did not have a role in closeout or reporting but did participate in a meeting at the end of the D-SNAP to discuss areas of strengths and in need of improvements.

### 3. Case Review

To conduct case reviews, the State mailed interview appointment letters to each client randomly selected for review. If the State could not reach the client for an interview, the review was considered incomplete; for these cases, the State decided if the case was incorrect or correct based on the information available. For cases with identified overissuance, the State filed a 20-CD (i.e., a claim for overpayment) with the recovery section of LA-DCFS and reported the overissuance to FNS. The most common error reviewers identified was unreported client income. Some agency errors were also reported, such as not including people who were reported on the application or neglecting to ask some questions. The State has highlighted these areas in trainings since.

Interview recordings aided case reviews. The State reviewed a random sample of 2,324 cases (1,979 approved, 345 denied). In addition to fraud and quality control staff, the State hired retired LA-DCFS workers to help complete the case reviews. State agency staff did not speak specifically about the case review process for employee applications, but according to staff from the Southwest Regional Office, these applications were typically reviewed by management-level staff from another office, and all employee cases underwent review.



**Best Practices for Reporting:** A benefit of recording interviews is the ability to refer to these recordings for case reviews.

State agency staff shared that these case reviews were particularly burdensome given the subsequent disasters (i.e., Hurricane Delta, Hurricane Zeta) that began less than 2 months after Hurricane Laura. They noted that FNS required more case reviews for the D-SNAP than their regular SNAP caseload of about 400,000 cases, and when compounded with several disasters, the State could not complete this work at its level of staffing.

*“So it was quite the daunting task...considering we did Hurricane Laura, Hurricane Delta, Hurricane Zeta, winter storms, and then floods. So in 5 years in 6 or 7 months’ time we had five disasters, and each of those we were required to review right at 2,000 cases—so you’re talking 10,000 case reviews. We had to hire staff from outside, some of our retirees, to come in and help us [with] that because there was no way we had enough staff to be able to do that kind of work.”*

—State agency staff



**Key Considerations for Reporting:** FNS required a high number of case reviews following the virtual D-SNAP. These case reviews were labor intensive, and in the setting of other disasters, the State struggled to manage this workload.

## G. Characteristics of Affected Households

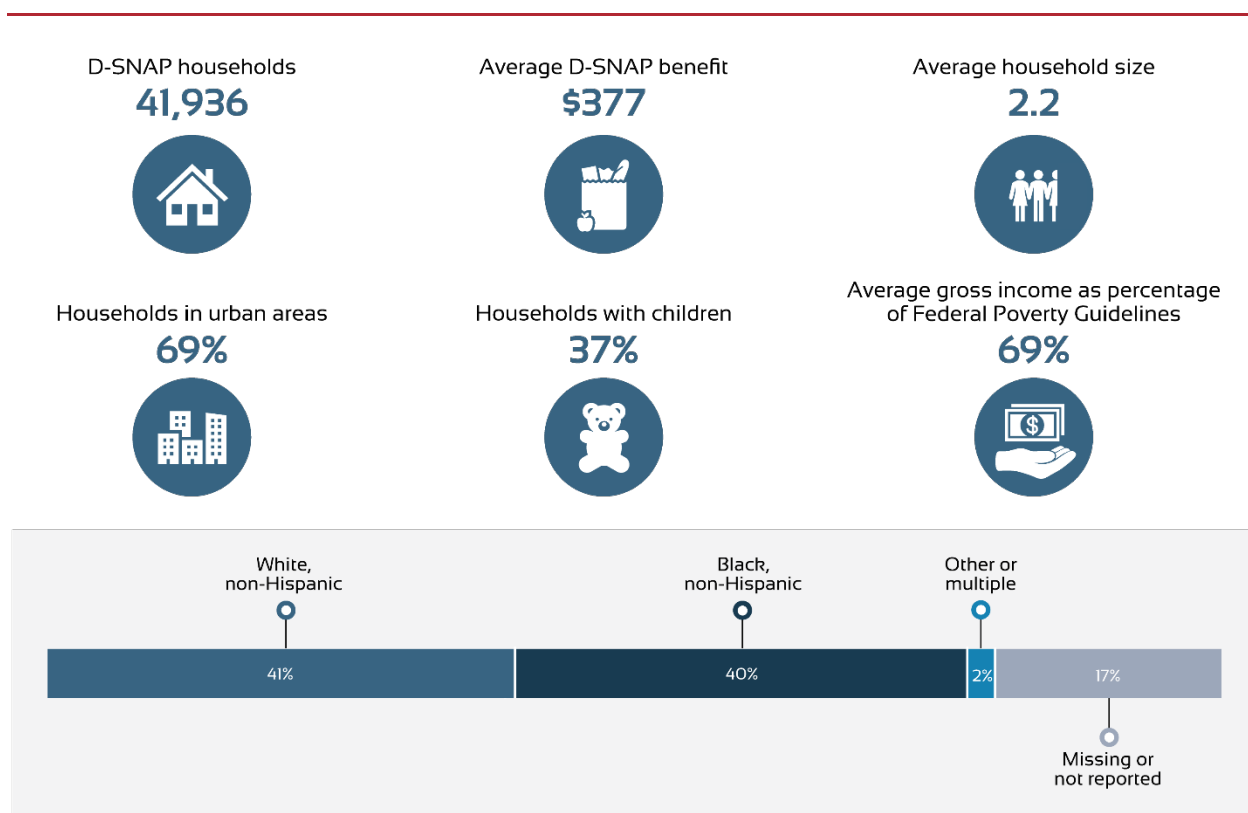
Administrative data provided the opportunity to examine the characteristics of households affected by each disaster. Louisiana tracked D-SNAP and SNAP enrollment during the D-SNAP application period in

two separate systems. Appendix C table C.1.1 provides additional data for all D-SNAP and SNAP households during the Hurricane Laura D-SNAP.

## 1. D-SNAP Household Characteristics

State eligibility systems recorded 41,936 households receiving D-SNAP benefits following Hurricane Laura in Louisiana (see figure 3.4).<sup>9</sup> An average D-SNAP household consisted of 2.2 household members; 37 percent of households included a child. Over two-thirds of D-SNAP households resided in an urban area. Race data were missing for 17 percent of the D-SNAP households, and the D-SNAP did not collect information on Hispanic ethnicity. About 40 percent of the D-SNAP heads of household who reported their race identified as Black. The average D-SNAP benefit amount was \$377, with all benefits over \$50. Gross household income was missing for 9 percent of the caseload. Of those reporting income, 69 percent of D-SNAP households reported income below 130 percent of the Federal Poverty Guidelines.

**Figure 3.4. Characteristics of D-SNAP Households, 2020 Hurricane Laura, Louisiana**



Note: Percentages may not add to 100 percent because of rounding.

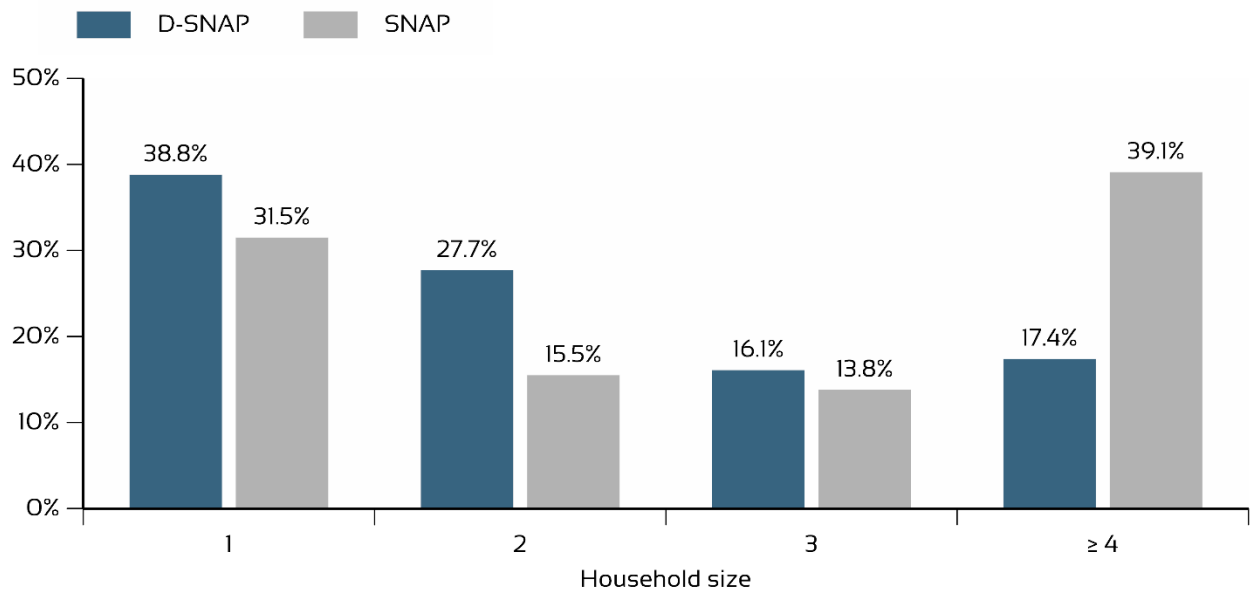
## 2. D-SNAP Household Characteristics Compared With SNAP Households

During the D-SNAP application period, 126,500 SNAP households were located within the 21 D-SNAP parishes, representing 29 percent of the total 435,377 SNAP households in Louisiana. Compared with SNAP households in the same parishes, D-SNAP households were more likely to be a household of one (figure 3.5). This may reflect the lower proportion of D-SNAP households with children (37 percent

<sup>9</sup> This number includes all unique D-SNAP households observed in September and October 2020 receiving benefits as a result of Hurricane Laura. The number of households tracked in the administrative records may differ from other sources because of several factors, including limitations of the eligibility system, edits to the records, and differences in how the study team processed the data compared with the State data team.

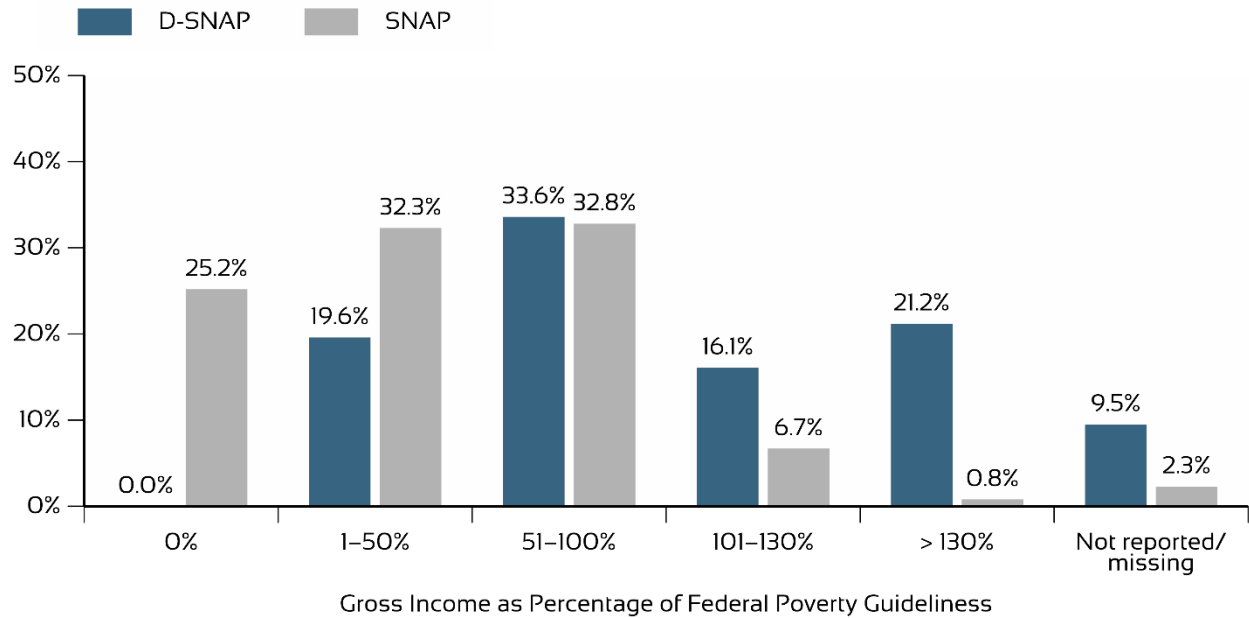
compared with 50 percent of SNAP households). While a quarter of SNAP households reported no income, only seven D-SNAP households fell in this category. Program eligibility differences between the two programs likely explain several key variations between the program caseloads. For example, D-SNAP households also had higher gross incomes as a percentage of the Federal Poverty Guidelines (figure 3.6). In all SNAP households, at least one household member was employed, compared with 51 percent of D-SNAP households. Lastly, D-SNAP households received larger benefit amounts compared with SNAP households (see appendix C table C.1.1), even though they earned relatively more. While each D-SNAP household receives the maximum benefit allowed for its household size, SNAP benefits are based on income and expenses in addition to household size.

**Figure 3.5. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Parishes, 2020 Hurricane Laura, Louisiana**



Source: Louisiana administrative data

**Figure 3.6. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Parishes, 2020 Hurricane Laura, Louisiana**

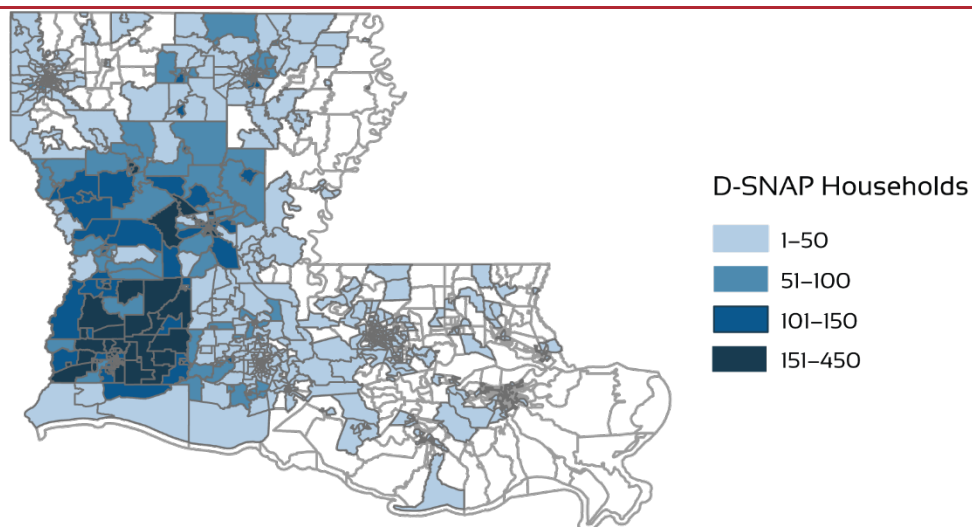


Source: Louisiana administrative data

## H. Geospatial Impact of D-SNAP

A spatial assessment of the distribution of D-SNAP households shows a significant clustering in a subset of census tracts located in the southwest corner of the State. The number of D-SNAP households ranges from 0 to 450 within census tracts in Louisiana (see figure 3.7). Not surprisingly, the census tracts with the largest number of beneficiaries were in D-SNAP parishes. However, the map also indicates some D-SNAP beneficiaries relocated outside D-SNAP parishes after the disasters.

**Figure 3.7. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Hurricane Laura, Louisiana**



## I. Data Limitations

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The Louisiana D-SNAP system did not track participant disability status or Hispanic ethnicity.

Louisiana's D-SNAP eligibility system did not include any unique identifier that could be linked to the SNAP eligibility system (e.g., SSN). The study team could not examine whether any individuals had transitioned from D-SNAP to SNAP in the 6 months following the D-SNAP operation.

## J. Conclusions

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In 2020, necessitated by the conjunction of Hurricane Laura and the COVID-19 pandemic, Louisiana operated its first virtual D-SNAP to meet the needs of D-SNAP clients. Because Louisiana experiences frequent disasters, residents have a recurring need to use D-SNAP and, therefore, an understanding of the D-SNAP process. Louisiana's successes and lessons learned can be applied to future virtual D-SNAPs. Staff and community stakeholders noted several areas of the D-SNAP that worked well:

- ▶ **Preregistration system:** Clients could preregister to provide information for their D-SNAP application to streamline the application process and identity verification. Once a client has preregistered, their information is maintained in the system. This is important given the frequency with which Louisiana experiences disasters.
- ▶ **Proactive establishment of partnerships:** Before Hurricane Laura made landfall, Louisiana had established partnerships and CEAs. Louisiana's partnership with YoungWilliams was especially valuable; call center staff were already trained on D-SNAP, and YoungWilliams was able to support the transition to virtual D-SNAP.
- ▶ **Staffing and communication structure within virtual teams:** Each virtual team included a team lead, a monitor, policy staff, and fraud staff. These additional staff answered eligibility workers' questions and facilitated the application process. Teams used Skype chat rooms to ask questions and were able to view previous questions and answers. Through morning huddles, these teams were kept up to date on common issues, resolutions, and D-SNAP progress. Team members in leadership roles met at the end of each day to discuss issues and resolutions and identify information to bring to the morning huddle.
- ▶ **Upper management structure:** Adhering to the ICS for virtual D-SNAP promoted clear channels of management and communication. Upper management worked from a command room where they could quickly make decisions.
- ▶ **211 line:** The public awareness campaign used the 211 call-in system. Because clients were already familiar with this resource, providing information on the D-SNAP through 211 was an efficient communication strategy.
- ▶ **Interview recordings to proactively address fraud:** Recording of interviews deterred fraud and supported program integrity. Eligibility workers could also communicate with fraud staff through chat rooms or add them to interviews when needed. Interview recordings also aided the case reviews.



Opportunities for improving future D-SNAPs follow:

- ▶ **Avoid using prepinned and preactivated EBT cards because they cannot be mailed safely.** When Louisiana shifted to a virtual D-SNAP, it needed new EBT cards. In-person and virtual D-SNAPs have different considerations for EBT card distribution and activation. States that anticipate operating virtual D-SNAPs should stock EBT cards that can be safely and securely mailed.
- ▶ **Anticipate difficulties mailing EBT cards after the disaster.** Because the D-SNAP was virtual, clients received EBT cards by mail. Disaster-related damage presented some physical and logistical challenges for mailing the cards and made it difficult to distribute EBT cards on time.
- ▶ **Avoid assembling large team dispersed across the State.** Staff at all levels commented on challenges related to working with and managing large teams that were arbitrarily assembled. Even in a virtual setting, assembling teams of staff who are accustomed to working together will produce a more effective working group.

## Chapter 4. North Carolina Case Study

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The case study assessment of North Carolina's D-SNAP response to two disasters in 2018 incorporates qualitative and quantitative findings. North Carolina is the only State included in this report that administers SNAP at the county level.

Qualitative findings are based on interviews conducted virtually over a 4-week period and in person over a 5-day period in February and March 2022. The study team interviewed State agency staff, local office staff, county staff, staff from local emergency management agencies, and staff from CBOs for the two disaster-affected counties. In total, the study team conducted 11 interviews ranging from 1 to 2 hours each.

Quantitative findings are based on SNAP and D-SNAP administrative datafiles received from the State's information technology contractor. The datafiles contained information on household composition, economic characteristics, benefit amounts, and geographic location.

### A. Tornado and Hurricane Florence (2018) Overview

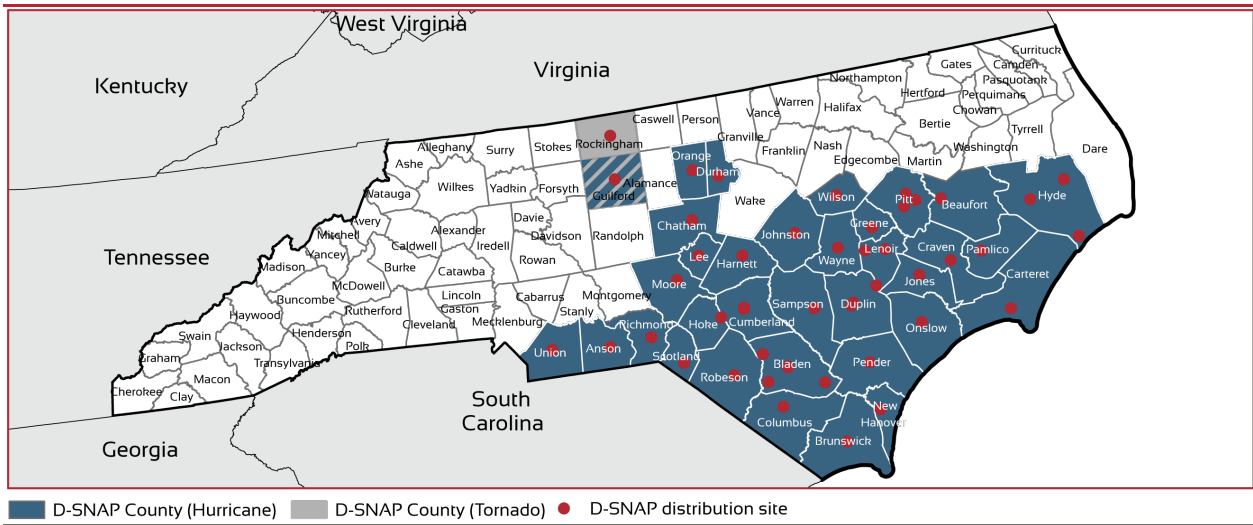
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On April 15, 2018, a tornado and severe storms (referred to here as tornado) affected Guilford and Rockingham Counties in North Carolina. They brought significant damage to public and private infrastructure, and the Guilford County school system was closed for 2 days because of power outages. On April 25, 2018, Governor Roy Cooper requested a major disaster declaration as a result of the tornado. The President issued a major disaster declaration on May 8, 2018, that made IA available to affected individuals and households in Guilford and Rockingham Counties.

On September 14, 2018, Hurricane Florence made landfall near Wilmington, North Carolina, as a Category 1 Hurricane. North Carolina experienced damaging winds, torrential rainfall, and flooding. Hurricane Florence affected 68 of North Carolina's 100 counties. On September 13, 2018, Governor Roy Cooper requested an expedited major disaster declaration as a result of Hurricane Florence; this event was of the severity and magnitude that the need for supplemental Federal assistance was determined to be necessary prior to the completion of joint Federal, State, and local government Preliminary Damage Assessments. The President issued a major disaster declaration on September 14, 2018, that made IA available to affected individuals and households. Ultimately, 34 counties across the State operated D-SNAP in the aftermath of the hurricane.

While 34 counties operated a D-SNAP for Hurricane Florence, this case study focused on the operations and staff from Cumberland County. The other county that participated in this study, Guilford County, operated D-SNAPs following both the tornado and Hurricane Florence, but the interviewers asked respondents to focus on the D-SNAP following the tornado.

**Figure 4.1. Map of D-SNAP Counties and Sites, 2018 Tornado and Hurricane Florence, North Carolina**

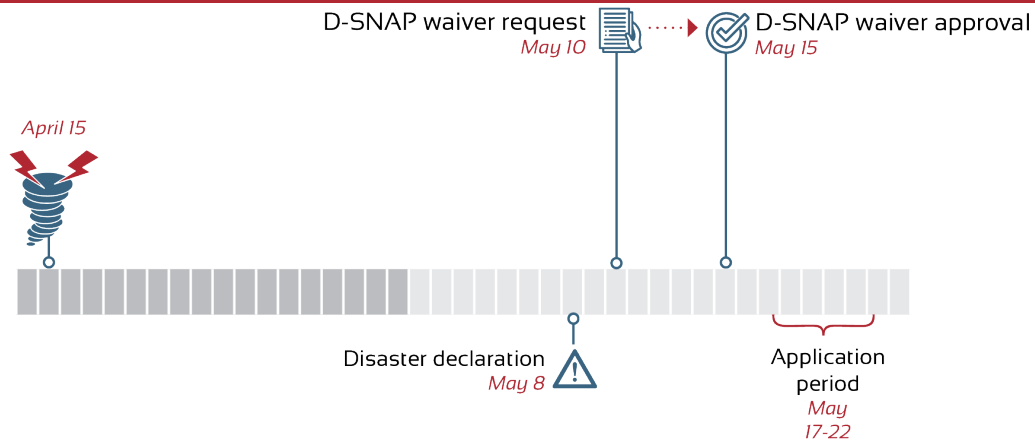


### 1. Timeline of Events

For the tornado, North Carolina submitted a D-SNAP waiver request to FNS on May 10, 2018, within 2 days of the major disaster declaration. FNS approved the D-SNAP request on May 15, 2018, and North Carolina operated this D-SNAP from May 17 to May 22, 2018 (see figure 4.2). The resulting D-SNAP served 2,581 households and issued \$1,025,803 in total D-SNAP benefits.

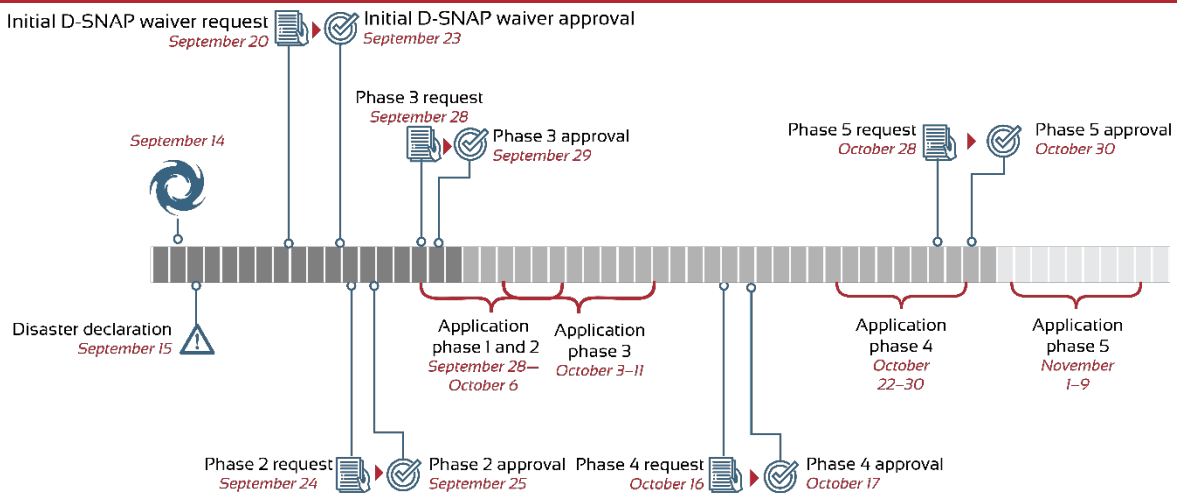
For Hurricane Florence, North Carolina submitted the original D-SNAP waiver request to FNS on September 20, 2018. FNS approved the D-SNAP request on September 23, 2018. North Carolina submitted four additional waiver requests through October 28, 2018. In total, the D-SNAP encompassed five phases. The first phase began on September 28, and the last phase ended on November 8, 2018 (see figure 4.3). The resulting D-SNAP served 205,449 households and issued \$84,517,973 in total D-SNAP benefits.

**Figure 4.2. Timeline of the D-SNAP Operation, 2018 Tornado, North Carolina**



Source: North Carolina D-SNAP postdisaster report

**Figure 4.3. Timeline of the D-SNAP Operation, 2018 Hurricane Florence, North Carolina**



Source: North Carolina D-SNAP postdisaster report

## B. General Planning

Staff at the North Carolina Department of Social Services (NC-DSS) prepare the annual D-SNAP plan and submit it to FNS. The State plan is generic to ensure it can be applied to more than one type of disaster. State agency staff consulted with IT staff who maintain the State’s SNAP eligibility system, North Carolina Families Accessing Services through Technology (NCFAST), for their input and expertise on the sections of the plan related to the technology and systems involved in operating a D-SNAP. Changes to the plan were minimal prior to the COVID-19 pandemic. The State has since updated its plan to include protocols for operating a D-SNAP during a pandemic. State agency staff consulted with county administrators to brainstorm and develop these pandemic protocols.

NC-DSS staff see their roles in D-SNAP planning as sharing best practices across counties and ensuring D-SNAP operations meet Federal and State requirements. For example, the State plan describes the civil rights requirements related to D-SNAP site selection and lessons learned from previous D-SNAPs (e.g., minimum amount of parking necessary, suggested site size). State agency staff noted that their goal in

developing the plan is to provide detailed information to help counties make informed decisions and operate a successful D-SNAP, regardless of whether it is a large- or a small-scale operation.

*“Don't try to reinvent the wheel. ... We didn't just create our process out of thin air. We ... went to neighboring counties and asked for their ideas, and we ... sat down and ... said, OK, this we think would work for us. ... Communicate with your partners and the people close to you to see if they can help you get started.”*

—County staff

## 1. County D-SNAP Plans

Each county develops its own county disaster response plan. These plans are used internally in the event of a D-SNAP and are not submitted to FNS. Each plan is specific to the county's circumstances and includes staff rosters, checklists for materials and supplies needed to operate a D-SNAP (e.g., port-a-potties, cones, golfcarts, clipboards, pens), site schematics, and flow charts. County staff noted that when developing a D-SNAP plan, it was beneficial to use examples from other counties that had fielded successful D-SNAP operations and modify their plans as needed.



**Best Practices for D-SNAP Planning:** Review D-SNAP plans from other States or counties that have had successful past operations and revise as needed. As county staff noted, it is not necessary to “create a process out of thin air.”

## 2. Relationships With Stakeholders

NC-DSS staff have relationships with the State emergency management (EM) agency and utility companies. These relationships facilitate the timely submission of the D-SNAP waiver request.

County DSS staff work with their local counterparts at the county EM agency to ensure integration of disaster response services. County DSS and EM staff noted the importance of creating and maintaining these relationships in non-D-SNAP years to ensure everyone is ready in the event of a disaster.

In Cumberland County, EM staff help develop the county D-SNAP plan, and DSS staff attend local emergency planning meetings to ensure lines of communication remain open. In the event of a disaster, the EM agency can—

- ▶ Help DSS share information about the D-SNAP through its mass communication system. County residents can opt in to the mass communication platform and receive emergency alerts via email or text message.
- ▶ Provide DSS with resources to aid in D-SNAP site setup (e.g., port-a-potties) and transportation (e.g., golfcarts), particularly if supply lines are more difficult to access as a result of the disaster.
- ▶ Assist with coordination, such as by liaising with the county transportation agency to ensure public transit is able to effectively service the D-SNAP site by making temporary changes to its standard routes (e.g., moving a bus stop to accommodate the D-SNAP) and adding additional buses to serve the number of people who needed to get to and from the D-SNAP site.

In Guilford County, relations between the county DSS office and the EM agency were minimal during the D-SNAP but have improved since the agencies started working together more closely during the pandemic (e.g., by setting up a vaccination clinic). For the tornado D-SNAP, the EM agency only helped

with public outreach. However, the current EM agency director noted that the EM agency would be on the frontlines assisting with D-SNAP operations in the future. For example, the agency could provide county DSS with traffic control supplies (e.g., cones, barriers) and share knowledge about disaster logistics (e.g., where to source port-a-potties, how to develop an effective traffic flow).



**Best Practices for Cross-Agency Collaboration:** Interagency relationships need to be maintained in times when there are no disasters. Regular meetings (e.g., quarterly, biannually) can help ensure staff in both agencies have open lines of communication.

## C. Event-Specific Planning

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### 1. Estimating Need

When the disasters profiled in this study struck North Carolina, the State agency staff did not complete comprehensive needs assessments because they were not required by FNS. However, one former State employee noted that the needs assessment is an important tool to help determine which counties should participate in a D-SNAP operation. In 2018, North Carolina requested that any county that received an IA declaration be included in the D-SNAP, regardless of need. The Hurricane Florence D-SNAP included five phases because counties were added to the IA declaration as the disaster progressed. Staff noted that including all IA counties in a D-SNAP may lead to unnecessary efforts. They were concerned that increasing the number of potential applicants could lead to greater fraud.

### 2. D-SNAP Waiver Request

NC-DSS staff are responsible for completing the D-SNAP waiver request. The timing of the submission of the D-SNAP request to FNS depends on several factors, including the timing of the IA declaration, receipt of approval from the Governor's office, and access to disaster impact data. When possible, NC-DSS staff begin working on the request before the disaster strikes. They noted the importance of working closely with FNS Regional Office staff during the D-SNAP request process.

Completing the D-SNAP waiver request process following Hurricane Florence was challenging because additional counties were added to the IA declaration several times. This meant different counties were operating the D-SNAP on different timelines, making it difficult to effectively inform the public about the D-SNAP application periods. State agency staff noted it would be helpful to receive guidance from FNS on how to improve the timing of D-SNAP operations in circumstances where the scope of the disaster is large, and the areas included in the IA declaration keep expanding.



**Best Practices for Completing the Waiver Request:** If possible, begin drafting the waiver request before the disaster strikes or the IA declaration is announced. Communicating with FNS early and often can also help streamline the process.

### 3. Other Waivers and Policy Flexibilities

When determining what other waivers to request (e.g., hot foods, mass replacements), NC-DSS staff present all available options to the Governor and the Secretary of Human Services, who make the final decision. Staff in Cumberland County noted their county did not have a mass replacement waiver, and many ongoing SNAP households came into the county office for replacement benefits. Because the timing of these requests overlapped with the D-SNAP application period, processing the replacements

was a challenge for county staff. They noted that mass replacements would reduce overtime costs because staff processing replacements could work the D-SNAP instead. They also shared that a mass replacement waiver could decrease the number of people coming into the building, thereby ensuring better customer service for D-SNAP applicants.



**Key Considerations for Other Disaster Response Waivers:** Mass replacement waivers can help ease the burden on local staff and streamline D-SNAP operations.

## D. Implementation

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Once FNS approves the D-SNAP request, State and county DSS staff must begin the process of implementing the D-SNAP, including selecting sites, determining staffing, and alerting partner organizations and the public.

### 1. Site Selection

County DSS staff have the responsibility for selecting the D-SNAP site(s). State agency staff provide technical assistance. For example, they advise counties to limit the number of sites because managing several sites can be difficult.

#### *Capacity and other considerations for in-person sites*

Both counties profiled in this report used their county DSS office as the D-SNAP site because it was the largest building available to them. Staff highlighted the following advantages of using the county DSS office:

- ▶ Staff knew the building well, had control over its use (e.g., could rearrange chairs and furniture as needed), and did not have to worry about internet connectivity, supplies, power, or air conditioning.
- ▶ Staff were also able to easily return to their desks and do their regular work if D-SNAP applications were slow.
- ▶ Onsite staff who could enter data from the paper applications into NCFAST were critical to ensuring benefits were issued within 72 hours.
- ▶ Clients were familiar with the office location.
- ▶ Bus stops were already located at or near the DSS offices, and the parking lots were built to include drop-off areas.

Staff in Cumberland County had no complaints about the adequacy of the D-SNAP site. Staff in Guilford County said their DSS office was adequate for the tornado D-SNAP but noted the site would not have the capacity to serve a larger D-SNAP. State agency staff noted that counties face challenges in finding sites large enough to adequately handle the number of D-SNAP applicants.

*“It worked well that people were [at the County DSS office], so if they needed to work D-SNAP for a couple hours and then handle something on their job, their regular job, and then come back down here, it was easy access.... We were in control of this site, so if we needed to switch something quickly and use another room, there was no asking anybody.”*

—County staff



**Best Practices for Site Selection:** Choose a site central within the community, known to the public, and easily accessible; local DSS offices can be a good choice and often have enough capacity. Other advantages include control over the site, connectivity, and air conditioning.

## 2. Civil Rights Protections

NC-DSS staff provided guidance on ADA and civil rights protections, but it was up to each county to ensure site compliance. County staff worked to observe all civil rights protections for D-SNAP clients. Because the counties used their local DSS offices as D-SNAP sites, each site was already ADA-compliant, and connectivity (e.g., light, power, internet) was not an issue.

Counties established measures to provide additional assistance to those in need. The D-SNAP sites had designated spaces where clients with disabilities and older individuals could sit down and move through the D-SNAP application process more expediently. The counties also used golfcarts to help bring people from the parking lot.

Cumberland County had a satellite site near its main location specifically to accommodate older clients, individuals with disabilities, or those who required additional assistance. The satellite site was added because county DSS staff faced challenges serving individuals who required additional assistance during the 2016 Hurricane Matthew D-SNAP. Vans ran between the two sites to transport applicants. Staff noted the slower pace of the satellite site allowed staff to accommodate the needs of special populations; for instance, staff at this site were able to go out to a client’s car to complete the application and eligibility interview if needed.

The counties had a two-pronged approach to assist clients who needed language accommodations. As a first step, they tried to determine whether an onsite staff member spoke the appropriate language and could assist as an interpreter. If that was not possible, staff used a language line for interpretation services.



**Best Practices for Civil Rights Protections:** A satellite site can be used to serve individuals requiring additional assistance; in North Carolina, the satellite site was quieter and calmer than the main site.

## 3. Staffing

The county administration was responsible for site staffing and led the D-SNAP operation. Other high-level staff were assigned to supervisory roles (e.g., managing the waiting room, overseeing workers conducting eligibility interviews). Each morning management held a group meeting. While the primary aim of the meeting was to share information and updates, these meetings also served as a pep rally to boost morale. Frontline staff also noted it was important and validating to see management present and involved in on-the-ground operations. Several respondents noted communication was a strength: Staff knew what to expect and whom to reach out to with questions or issues.





**Best Practices for Managing Staff:** Morning huddles were key for sharing updates and maintaining high staff morale during D-SNAP operations.

A State liaison was also present at each site for the duration of the D-SNAP. This liaison helped answer any policy or IT-related questions. In addition to staff who usually process SNAP, Temporary Assistance for Needy Families (TANF), and Medicaid applications, staff from other departments, such as child services and adult services, were recruited to help. Counties across the State also helped each other during the Hurricane Florence D-SNAP because of the high need and the high number of applications. Neither county used temporary staff; respondents noted it would have been difficult to train any temporary workers in time to be helpful for the operation.

Respondents discussed best practices related to staffing a D-SNAP. Staff from Cumberland County trained more individuals than they thought were necessary to be ready in case the D-SNAP was larger than expected. The ability to overstaff the operation was facilitated by the county's use of its office space (e.g., staff who were not needed could easily work at their desks until they were needed) and the county-administered structure of the D-SNAP. Staff from Cumberland County discussed the importance of a centralized command structure, or "war room," to ensure upper management could be in one place and quickly make decisions about operations. They noted this structure as one of their lessons learned from the 2016 Hurricane Matthew D-SNAP.



**Best Practices for Staffing:** When possible, train more staff than are required in case D-SNAP demand is higher than anticipated. A central command structure, or "war room," can promote quick decision making.

## Training

Trainings were conducted once the D-SNAP waiver request was approved by FNS. NC-DSS staff conducted trainings for county managers (e.g., the county administrator and other supervisors). The trainings were separated into several modules and conducted virtually. The trainings covered the details of the specific D-SNAP, including the application period, and a refresher on how to determine eligibility for D-SNAP (e.g., determining household composition and income).

County managers trained frontline county staff. Training topics varied depending on the role each staff member would play during the D-SNAP operations. Workers who conducted eligibility interviews or made the final determination on a case were trained on the differences between SNAP and D-SNAP and how to enter a D-SNAP application into NCFAS. Support staff who were not determining eligibility or conducting interviews typically received little formal training. Overall, frontline staff noted the training they received was sufficient and straightforward; they shared that processing a D-SNAP application was much simpler than a SNAP application because fewer verifications were needed.

NC-DSS staff noted several reasons for not conducting an annual D-SNAP training: (1) the details of each D-SNAP vary depending on the specific terms in FNS's approval of the waiver; (2) staff would forget what they were trained on because they do not complete D-SNAP tasks day-to-day; and (3) it is difficult to ensure everyone could attend a yearly training. County management echoed that it is unnecessary to train staff on D-SNAP before a waiver is approved because it is not part of their daily duties.

## 4. Public Awareness Campaign

The public awareness campaigns for both D-SNAPs were developed by State agency staff and implemented by county staff. State agency staff developed the press release materials to ensure consistent language was used across D-SNAP counties. The State posted the press release on its website and shared it with the D-SNAP counties. The county offices then posted the press release materials on their county DSS websites, county websites, and social media pages. Information developed by the State was also shared via TV and radio. Many respondents noted clients learned about the D-SNAP through word of mouth and informal social media posts by community members.

Overall, respondents reported the public information campaigns were successful based on the large number of applicants who showed up at each D-SNAP site. However, some county and local DSS staff expressed confusion regarding the delay of D-SNAP operations after the disaster strikes; many felt clients needed the benefits sooner rather than later. However, State agency staff often have little control over the timing. For example, in Guilford County, the disaster declaration was not received until about 3 weeks after the disaster; the County submitted the waiver request within 2 days of receipt of the disaster declaration.

## 5. Role of Partners and Other Stakeholders

The counties involved several community partners in the public awareness campaign. Cumberland County staff shared press release materials with their local disaster recovery coalition. This organization, which has a large listserv of local CBOs, churches, and other volunteer organizations, was then able to further spread the word. Emergency management agencies in both counties also used their networks to spread the word about the D-SNAP.

## E. Operations

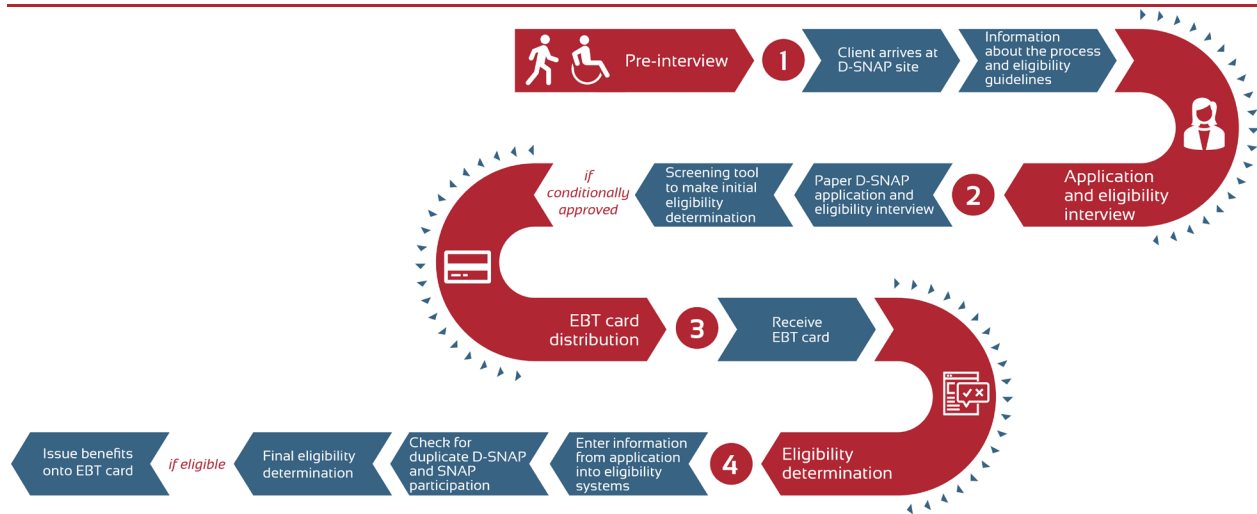
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The D-SNAPs in North Carolina provide a study-within-a-study, highlighting the similarities and differences in the application and EBT card issuance processes and strategies the two counties used to ensure program integrity. This section also discusses the effects of working on a D-SNAP operation on SNAP staff.

### 1. Application Process

The application process was similar for both D-SNAPs. Figure 4.4 presents an overview of the D-SNAP application process in North Carolina. Clients arrived at the in-person site and completed a paper D-SNAP application and eligibility interview with a D-SNAP worker. Conditionally eligible clients were then sent to pick up an EBT card. Another worker then received the paper application, entered data from the paper application into NCFAST, and checked for duplicate participation.

**Figure 4.4. North Carolina’s In-Person D-SNAP Application Process**



ADA = Americans with Disabilities Act; EBT = electronic benefit transfer; NCFAS = North Carolina Families Accessing Services through Technology

### Preinterview

Clients arrived at the D-SNAP site by car, bus, carpool, or were dropped off by friends or family. Lines were long, and clients often had to wait outside before entering the building. Staff pulled individuals who required additional assistance from the primary application line into a separate queue. In Cumberland County, staff had golfcarts to help individuals get to the building from the parking lot. Staff informed clients about D-SNAP eligibility guidelines and next steps while they were waiting in line. Both counties relied on security to help with traffic flow and crowd management; one county used contracted office security, and the other partnered with local law enforcement.

One feature of the North Carolina D-SNAP operations was a client flow process designed to ensure D-SNAP clients were consistently moving through the line. This process provided clients with a sense of constant progress. Staff said this approach was key to maintaining client satisfaction during the D-SNAP; Cumberland County even received praise from clients on the smooth application process.

*“I think because of the way you all designed the stations, it’s kind of like a Disney World environment, right? You come in, you might wait 10–15 minutes, you go into a group orientation, you hear that—that’s 10–15 minutes —you move on to a person who takes your application. That might be 30 minutes. You then move to where they distribute the EBT cards. That might be 15 minutes. So, you know, it might have been a couple of hours, but because you were moving through stations, you were making progress, you weren’t just kind of waiting and then not knowing.”*

—County staff

Once clients entered the building, they were seated in a waiting room and provided with additional information about the application process. As eligibility workers became available, clients were moved from the waiting room to the interview areas for their D-SNAP eligibility interview.

The facilities that served as D-SNAP sites were functioning DSS offices, and non-D-SNAP clients needed access to the building to conduct their business. The counties used the following strategies to ensure non-D-SNAP clients had access to the building:

- ▶ Both counties used separate lines for D-SNAP clients, and Guilford County used separate entrances for D-SNAP and other clients.
- ▶ Cumberland County used a colored-card system to allow people visiting the office for non-D-SNAP purposes to enter without having to wait in line.

### ***Application and eligibility interview***

Clients completed their D-SNAP application and eligibility interview concurrently with the help of a D-SNAP worker. Because the information from the application would later be entered into NCFAST, workers typically completed the paper applications to ensure legibility. Workers used a screening tool to make initial eligibility determinations based on the information clients provided. In Guilford County, only SNAP eligibility workers conducted the eligibility interviews. In Cumberland County, any merit DSS staff (e.g., child welfare staff) who routinely interacted with program participants may have been assigned this role.

Clients who were conditionally approved for D-SNAP were escorted to another part of the building to receive their EBT cards. Clients who were not eligible for D-SNAP were escorted out of the building.

### ***EBT card distribution***

Clients received their EBT cards on site the same day they applied for D-SNAP benefits. EBT cards were kept in separate areas and locked behind two doors for additional security. Only designated staff were able to access the cards and issue them to clients. The process for distribution and staff involved in the distribution differed in the two study counties.

In Guilford County, the county administrator oversaw the distribution of EBT cards. Conditionally approved clients handed their paper D-SNAP application to a staff member, who gave their EBT card and affixed the sticker from the card to the paper application. Because these stickers sometimes fell off, staff made copies of the paper applications to create a permanent record of the application and sticker. The copy and the original application were sent for staff to input into NCFAST. While clients were waiting for their card, they watched a video about next steps (e.g., when benefits would be loaded, what to do if they do not receive their benefits, how to activate their card, how to use the card).

In Cumberland County, staff from the finance department oversaw the security and distribution of EBT cards. Conditionally approved clients were escorted to the EBT issuance area in groups of 20. A worker collected their paper applications and gave them to the EBT staff member, who issued each client an EBT card and affixed the sticker from the EBT card to the paper application. The EBT card number was also typed into an Excel-based application log. Clients were called to the EBT station by name to pick up their cards.

### ***Final decision***

After clients received their EBT cards, the paper applications were sent to workers who entered the data into NCFAST and checked for duplicate participation. Staff noted that denials could occur because household members other than the head of household were already receiving SNAP benefits or when the entire household was already receiving SNAP.

County staff typically completed data entry and made the final case determinations for D-SNAP applications submitted in their counties. However, because of the scale of Hurricane Florence, counties that were not operating a D-SNAP helped enter applications for D-SNAP counties to ensure the State would meet the timeliness standards (i.e., disbursing benefits within 72 hours of application).



**Best Practices for D-SNAP Application Processing:** SNAP staff set up different stations and ensured clients were consistently moving from station to station. Though clients sometimes waited more than an hour to complete the D-SNAP application process, this flow helped clients feel that they were making consistent progress.

## 2. EBT Benefit Issuance

As they picked up their EBT cards, clients were notified that if their application was approved, benefits would be loaded within 72 hours. They also received a flyer that provided information on activating their card and a phone number to call if they did not receive their benefits within 72 hours. Cumberland County also had a triage desk to handle any client questions, including those related to EBT issuance. Benefits were disbursed after county staff made the final determination to approve the case. Workers initiated disbursement by entering the EBT card number into the case in NCFAST.

Neither county ran out of EBT cards during its D-SNAP operation because the State planned to have enough EBT cards on hand. Under normal operations, county offices do not keep any EBT cards on site. EBT cards were delivered to the D-SNAP sites via personal car before D-SNAP operations began and during the operation as needed. Two individuals always accompanied the delivery of boxes of EBT cards.

County staff noted distributing EBT cards and issuing benefits were the most challenging aspects of the D-SNAP operations. First, staff had to manually enter EBT card numbers into NCFAST. This process resulted in some data entry errors county staff were not able to fix and had to escalate to State IT staff. One county staff member suggested incorporating barcodes onto EBT stickers to help mitigate these data entry errors. Second, State agency staff were eager to find an alternative way to distribute D-SNAP benefits. One State agency staff member noted mobile payments could provide States with additional flexibility and ensure clients receive their benefits on time. The staff member suggested that loading D-SNAP EBT benefits through a smartphone application would result in faster disbursement of benefits.



**Key Considerations for EBT Issuance:** Further use of technology, such as mobile payments or barcodes for EBT cards, could help facilitate timely issuance of D-SNAP benefits to clients and minimize data entry errors.

## 3. Program Integrity

D-SNAP poses program integrity challenges that are different from regular SNAP operations. SNAP eligibility workers noted SNAP clients typically have to provide verification (e.g., paystubs), while D-SNAP clients are taken at their word. While staff remarked that this policy is understandable given the nature of D-SNAP operations in the immediate aftermath of a disaster, it was still difficult for them to “forget” their previous SNAP training and apply the D-SNAP policy. State agency staff noted that while the lack of verifications is a program integrity risk, case reviews have shown only a few instances of people taking advantage of the program.

County staff implemented several measures to ensure program integrity throughout D-SNAP operations:

- ▶ The design of the D-SNAP application process ensured separation between eligibility determination and EBT card distribution. Clients received their EBT cards on site, while the final eligibility determination was made later when the application was entered into NCFAST.
- ▶ When the D-SNAP application was entered into NCFAST, staff checked for duplicate participation (i.e., whether anyone in the household was already receiving SNAP benefits).
- ▶ All applications were reviewed by several individuals: the worker who completed the eligibility interview, another worker who issued the EBT card, and the third worker who entered the application into NCFAST.
- ▶ Clients received information regarding fraud prevention at several points during the application process to ensure they could not claim they did not receive this information. USDA fraud prevention posters were also displayed across the D-SNAP site.



**Best Practices for Program Integrity:** Redundancy in the program integrity process helps eliminate fraud, mistakes, and misinformation. Sharing program integrity information with clients at several points in the application process and in different formats gives clients a better understanding of D-SNAP eligibility. Creating opportunities for several staff and staff in different positions to review applications ensures suspected fraud is adequately pursued and facilitates quality assurance.

### *Impact of D-SNAP Operations on Frontline Staff*

In-person D-SNAP operations placed a large demand on county DSS staff. The primary challenge staff faced was completing their regular work in a timely manner while also operating a D-SNAP. A staff member in Guilford County noted that the D-SNAP application period overlapped with the period the county processed most of its SNAP recertifications.<sup>10</sup> The county had to ensure these recertifications were processed on time to avoid a lapse in SNAP participants' benefits while devoting enough staff to D-SNAP operations. Although counties pooled staff from across DSS services, asked for help from other counties, and provided meals on site, respondents universally noted that the burden on staff was one of the largest challenges to operating a D-SNAP.

*“Yeah, we can't just take every staff person and put all our resources on D-SNAP because we have regular Medicaid, regular food stamps. None of those requirements stopped because the D-SNAP is on.”*

—County staff

Respondents advocated for the use of virtual options to alleviate staff and client burden in future D-SNAPs. NC-DSS staff noted that North Carolina developed an online preregistration form in 2021 that could ease the burden of D-SNAP operations on county staff by reducing the amount of time they need to devote to completing applications in person. While none of the county staff interviewed for this study had participated in a virtual D-SNAP, they believed a virtual D-SNAP would alleviate many of the physical burdens associated with in-person D-SNAPs (e.g., long days spent primarily on your feet, hot weather) for staff and clients.

<sup>10</sup> North Carolina did not request an extended certification periods waiver for the tornado D-SNAP.



**Key Considerations for Managing Staff:** D-SNAP places a large burden on frontline staff. Further use of technology, such as preregistration forms, could help alleviate some of the burden because clients could provide necessary information before arriving at the D-SNAP site.

## F. Reporting and Closeout

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During D-SNAP operations, State and county staff submitted daily reporting to FNS. Once the D-SNAP ended, staff closed out the D-SNAP sites, completed case reviews, and submitted final reporting to FNS.

### 1. Daily Reporting

NC-DSS staff were responsible for submitting reports to FNS. State agency staff held a daily meeting by phone with staff from counties actively operating a D-SNAP. During this call, county staff provided the total number of applications received, approved, and denied and the number of EBT cards issued. County staff either used spreadsheets to track the number of applications or manually counted the number of individuals who came to the D-SNAP site each day.

### 2. D-SNAP Site Closeout

Neither county had formal procedures for closing out the D-SNAP site. Respondents explained they returned the supplies and materials to their storage closets and rearranged all rooms to their original configurations. County DSS staff shredded all unused EBT cards from opened boxes; unopened boxes were returned to the State.

### 3. Case Reviews

State and county staff divided the responsibility of completing the necessary case reviews. State agency staff were responsible for completing case reviews for any State employee applications and for a random sample of 5 percent of public applications. The State hired temporary workers to complete all necessary case reviews for the Hurricane Florence D-SNAP because of the large scope of work. The State was able to complete the case review for the tornado D-SNAP without additional workers.

County staff completed reviews for all county employee applications. Two components facilitated the case review process: (1) management kept a special log of all employee applications, and (2) county staff applying for D-SNAP had to conduct their eligibility interview with a supervisor or team lead. During the case review process, management reviewed the information staff reported on the application to ensure it matched employee records (e.g., income, address). An investigation was opened if information was inconsistent.

The most common errors found during the case review process were related to income reporting. Staff noted that applicants frequently misreported their income (e.g., provided net instead of gross income) or incorrectly reported the income of another household member. The review discovered a few instances of blatant fraud, but the State did not prosecute any fraud cases.

To complete the final reporting process, State agency staff met to discuss lessons learned and best practices. State agency staff summarized their findings and compiled the results of the case reviews into the postdisaster report and submitted it to FNS.



**Best Practices for Case Reviews:** SNAP State agencies can use different methods for identifying employee applications for reviews: matching application data to HR records or keeping a log of all employee applications.

## G. Characteristics of Affected Households

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Administrative data provided the opportunity to examine the characteristics of households affected by each disaster. For North Carolina, the study team used administrative data to examine household characteristics for D-SNAP households, SNAP households with supplements, and SNAP households without supplements during each of the two disasters. Appendix C tables C.1.2 and C.1.3 provide additional data for all D-SNAP and SNAP households during the Hurricane Florence D-SNAP, and tables C.1.4 and C.1.5 provide additional data for the tornado D-SNAP.

### 1. D-SNAP Household Characteristics: Hurricane Florence

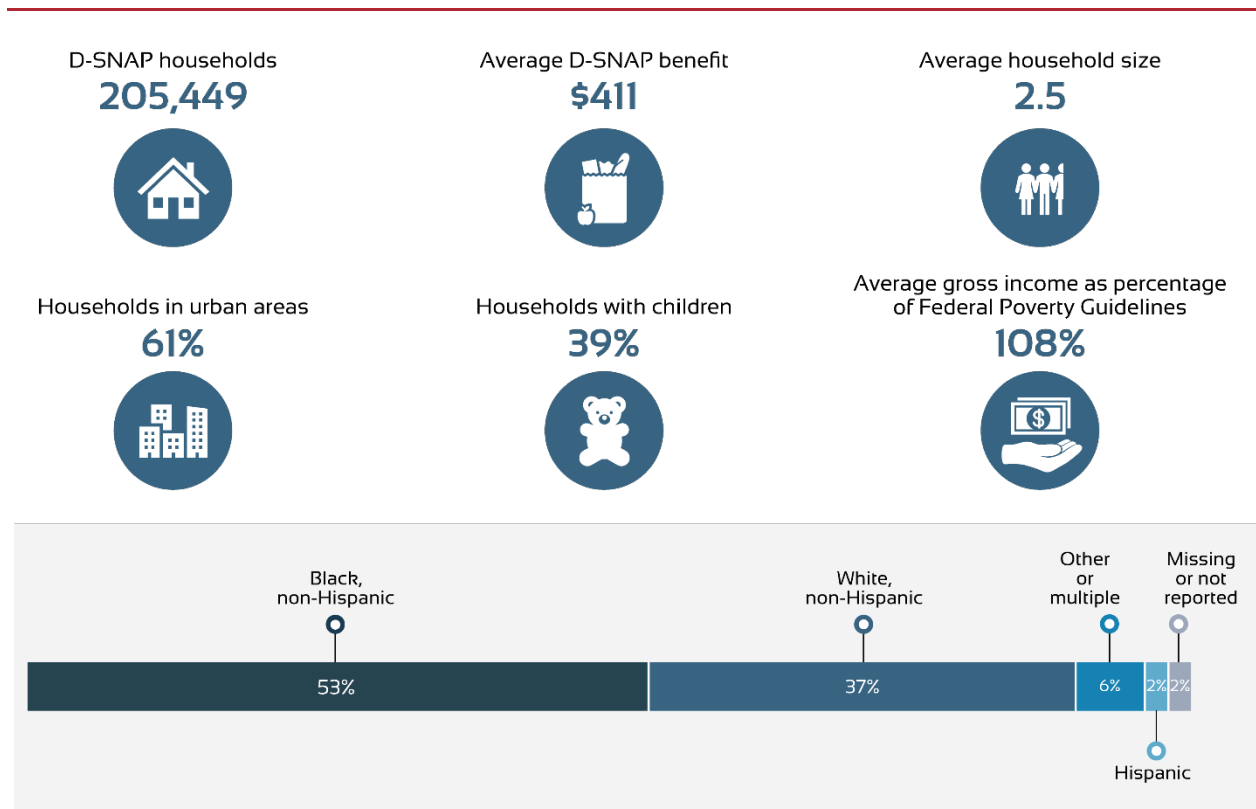
State eligibility systems recorded 205,449 households receiving D-SNAP benefits following Hurricane Florence (see figure 4.5).<sup>11</sup> An average D-SNAP household consisted of 2.5 household members; slightly fewer than two-fifths of households had a child. Almost two-thirds of D-SNAP households resided in an urban area, and over half of the D-SNAP heads of household identified as Black, non-Hispanic (53 percent). The average D-SNAP benefit amount was \$411. Sixty-five percent of D-SNAP households reported income below 130 percent of the Federal Poverty Guidelines.

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<sup>11</sup> This number includes all unique D-SNAP households observed in September and October 2020. The number of households tracked in the administrative records may differ from other sources because of several factors, including limitations of the eligibility system, edits to the records, and differences in how the study team processed the data compared with the State data team.



**Figure 4.5. Characteristics of D-SNAP Households, 2018 Hurricane Florence, North Carolina**

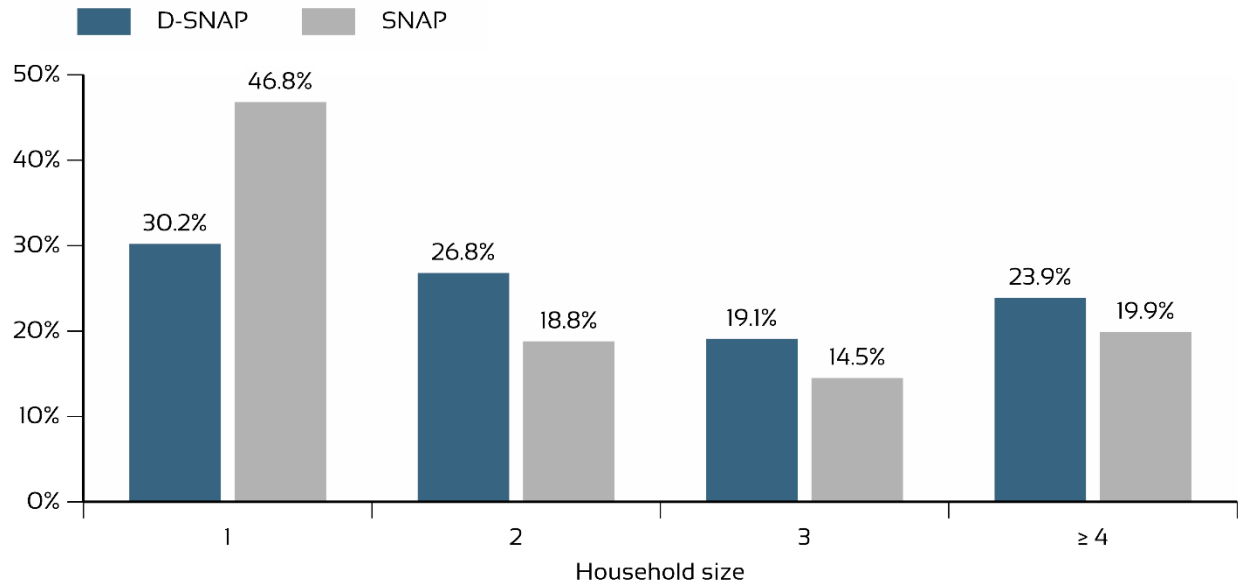


Note: The count of D-SNAP households observed in the administrative data provided by North Carolina varies from the count reported in the State’s postdisaster report. This discrepancy may result from revisions to the administrative data or differences in how the study team processed the files compared with the State data team. Percentages may not add to 100 percent because of rounding.

## 2. D-SNAP Household Characteristics Compared With SNAP Households: Hurricane Florence

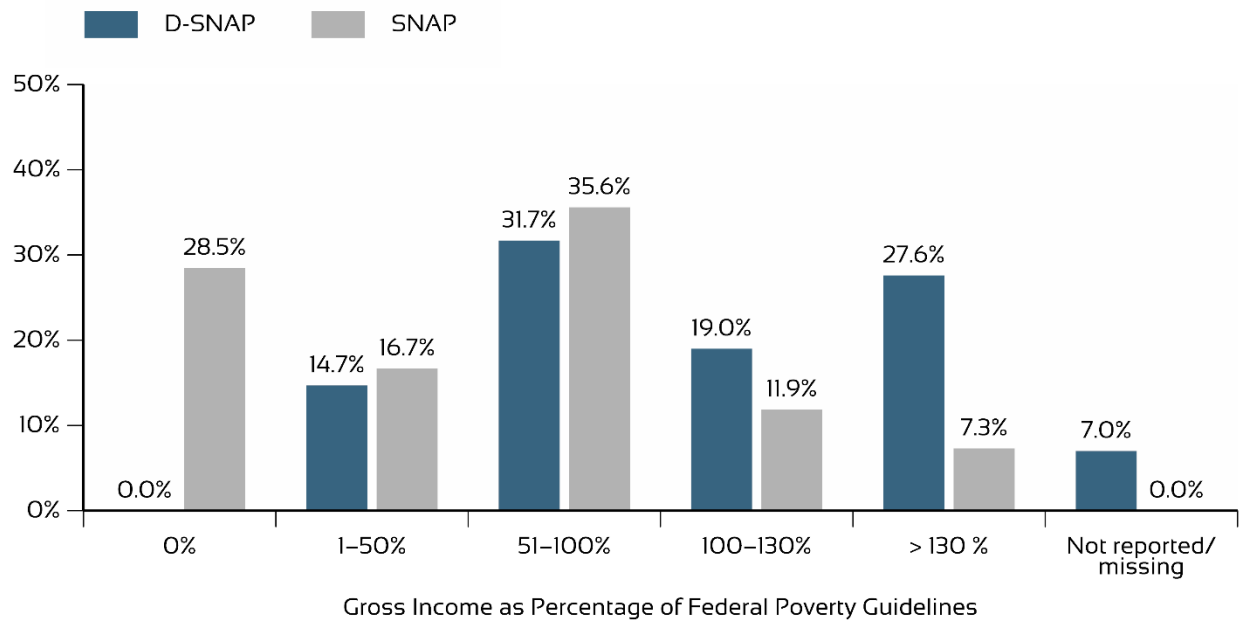
During the D-SNAP application period, 272,330 SNAP households were located within the 34 D-SNAP counties, representing 40 percent of the total 673,607 SNAP households in North Carolina. Compared with SNAP households in the same counties, D-SNAP households were less likely to be a household of one (figure 4.6; 30 percent in D-SNAP households; 47 percent in SNAP households). D-SNAP households also had higher gross incomes represented as a percentage of the Federal Poverty Guidelines (figure 4.7). While nearly 30 percent of SNAP households reported no income, only two D-SNAP households fell in this category. Despite relatively higher incomes, D-SNAP households received larger benefit amounts compared with SNAP households (see appendix C table C.1.2). The difference in benefit amount is explained by the larger household sizes and policy differences. While each D-SNAP household receives the maximum benefit allowed for its household size, SNAP benefits are based on income and expenses in addition to household size. The distribution of race and ethnicity among household heads was similar for D-SNAP and SNAP households living in D-SNAP counties (see appendix C table C.1.2). In D-SNAP counties, 61 percent of D-SNAP households were located in urban areas compared with 68 percent of SNAP households.

**Figure 4.6. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Hurricane Florence, North Carolina**



Source: North Carolina administrative data

**Figure 4.7. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Hurricane Florence, North Carolina**



Source: North Carolina administrative data

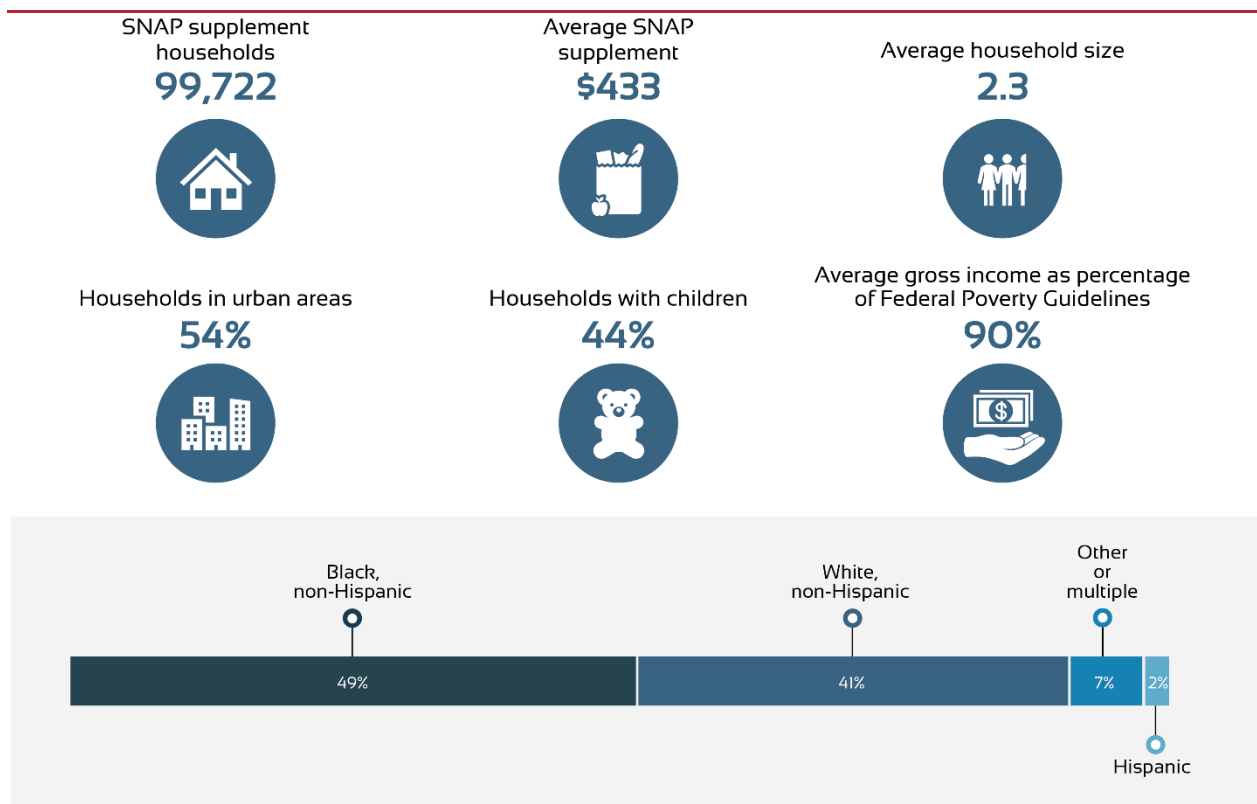
### 3. Household Characteristics by SNAP Disaster Supplement Status: Hurricane Florence

SNAP households residing in the D-SNAP counties (or who worked or owned a business in the D-SNAP counties) were eligible to receive supplemental benefits in response to the disaster. Of the 673,607 North Carolina SNAP households, 99,722 (15 percent) received a supplement during the Hurricane

Florence D-SNAP. The average supplement benefit amount was \$174, ranging from \$1 to \$1,534. Appendix C table C.1.3 presents characteristics of all SNAP households in North Carolina by whether they received a SNAP supplement.

Figure 4.8 summarizes the household characteristics of SNAP supplement recipients following Hurricane Florence. Before accounting for the supplement, households had an average SNAP benefit amount of \$433 and 2.3 household members. Almost half of the heads of SNAP supplement households identified as Black, non-Hispanic (49 percent), and 41 percent identified as White, non-Hispanic. Ninety percent of SNAP households receiving a supplement had an income below 130 percent of the Federal Poverty Guidelines. More households were located in urban areas (54 percent) than in rural areas.

**Figure 4.8. Characteristics of SNAP Supplement Households, 2018 Hurricane Florence, North Carolina**

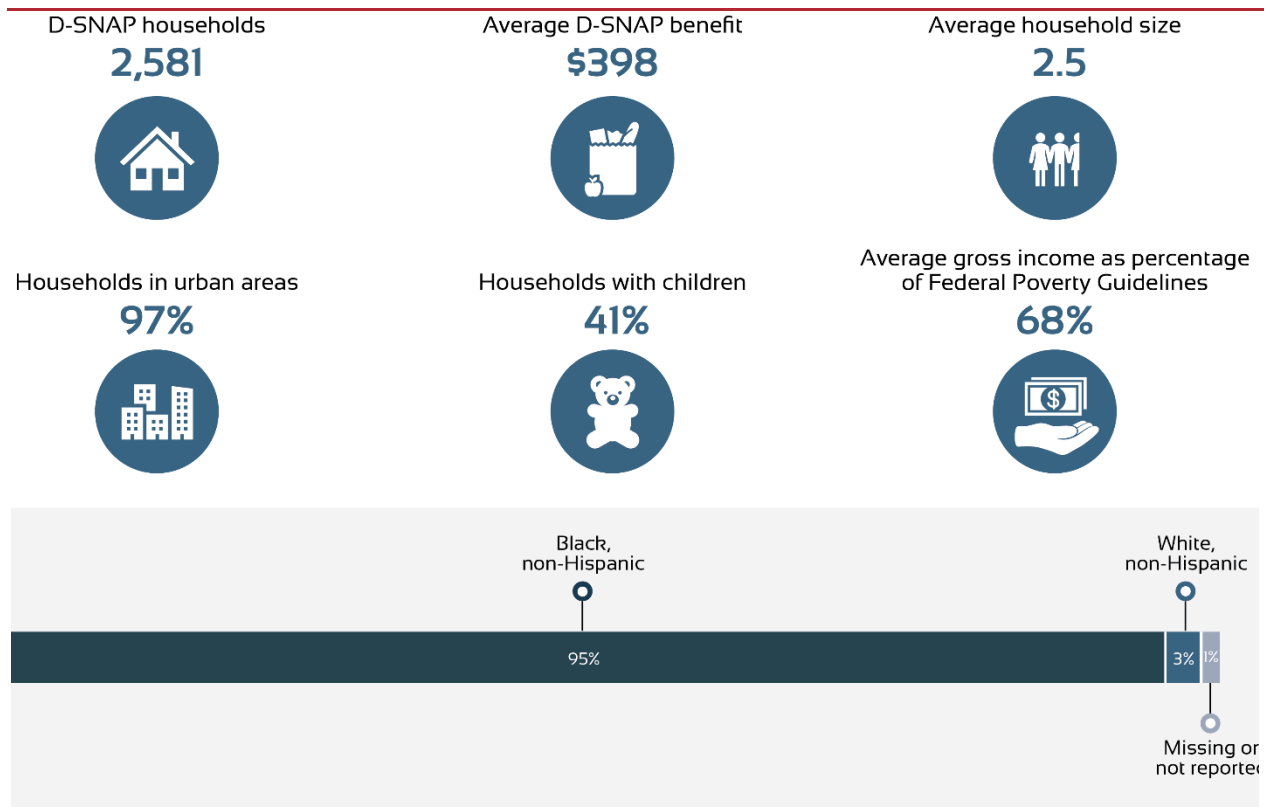


Note: Percentages may not add to 100 percent because of rounding.

#### 4. D-SNAP Household Characteristics: Tornado

State eligibility systems recorded 2,581 households receiving D-SNAP benefits following the spring 2018 tornado (see figure 4.9). An average D-SNAP household consisted of 2.5 household members; 41 percent of households included a child. Nearly all D-SNAP households (97 percent) resided in an urban area, and most of the D-SNAP heads of household identified as Black, non-Hispanic (95 percent). The average D-SNAP benefit amount was \$398, with all benefits over \$100. About two-thirds of D-SNAP households reported income below 130 percent of the Federal Poverty Guidelines.

**Figure 4.9. Characteristics of D-SNAP Households, 2018 Tornado, North Carolina**



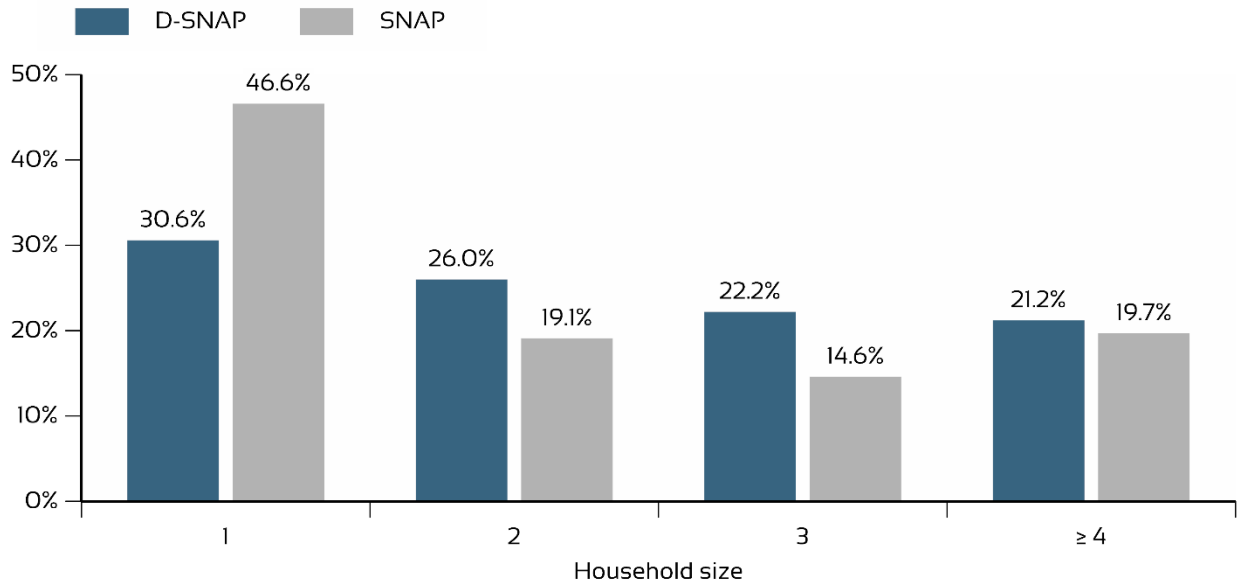
Note: Percentages may not add to 100 percent because of rounding.

### 5. D-SNAP Household Characteristics Compared With SNAP Households: Tornado

During the D-SNAP application period, 44,528 SNAP households resided in the 2 D-SNAP counties, about 7 percent of the total 645,046 SNAP households in North Carolina. Compared with SNAP households in the D-SNAP counties, D-SNAP households were less likely to be a household of one (47 and 31 percent, respectively; figure 4.10). D-SNAP households also had higher gross incomes relative to household size (figure 4.11). About 43 percent of SNAP households reported no income, whereas all D-SNAP households with available income data reported some income. Despite relatively higher incomes, D-SNAP households received larger benefit amounts compared with SNAP households (see appendix C table C.1.4). As with Hurricane Florence, the difference in benefit amount is explained by larger household sizes and policy differences. While each D-SNAP household receives the maximum benefit amount for the household size, SNAP benefit amounts are determined based on income and expenses in addition to household size.

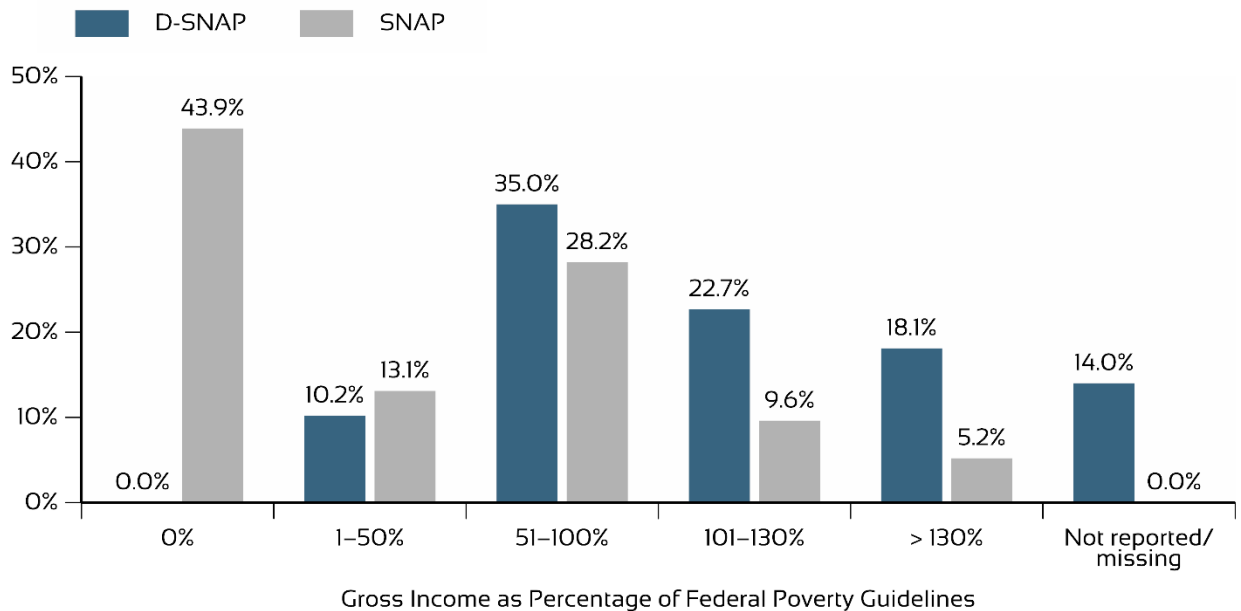
A larger proportion of the D-SNAP heads of households identified as Black, non-Hispanic (95 percent) compared with the SNAP household heads (60 percent), and SNAP had a larger share of White, non-Hispanic heads of household (33 percent) than D-SNAP (3 percent, figure 4.12). In D-SNAP counties, 97 percent of D-SNAP households were in urban areas compared with 91 percent of SNAP households. This difference likely reflects the tornado’s path through larger urban areas.

**Figure 4.10. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Tornado, North Carolina**



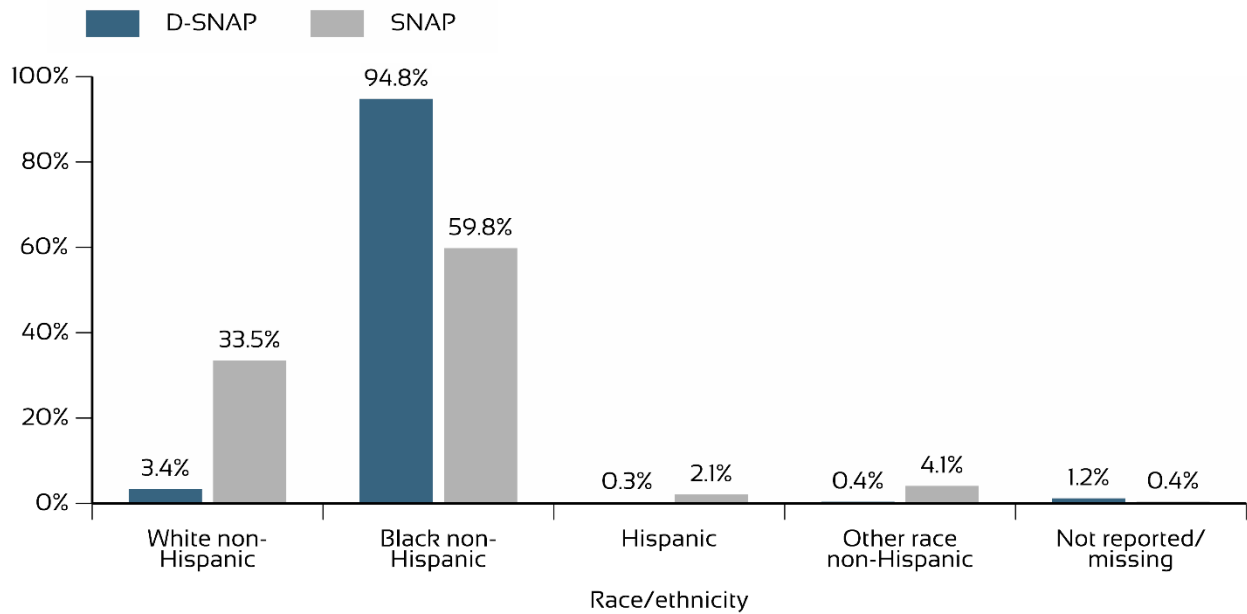
Source: North Carolina administrative data

**Figure 4.11. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2018 Tornado, North Carolina**



Source: North Carolina administrative data

**Figure 4.12. Distribution of Race and Ethnicity Among D-SNAP and SNAP Household Heads in D-SNAP Counties, 2018 Tornado, North Carolina**



Note: Race and Hispanic ethnicity were collected as two separate variables.  
Source: North Carolina administrative data

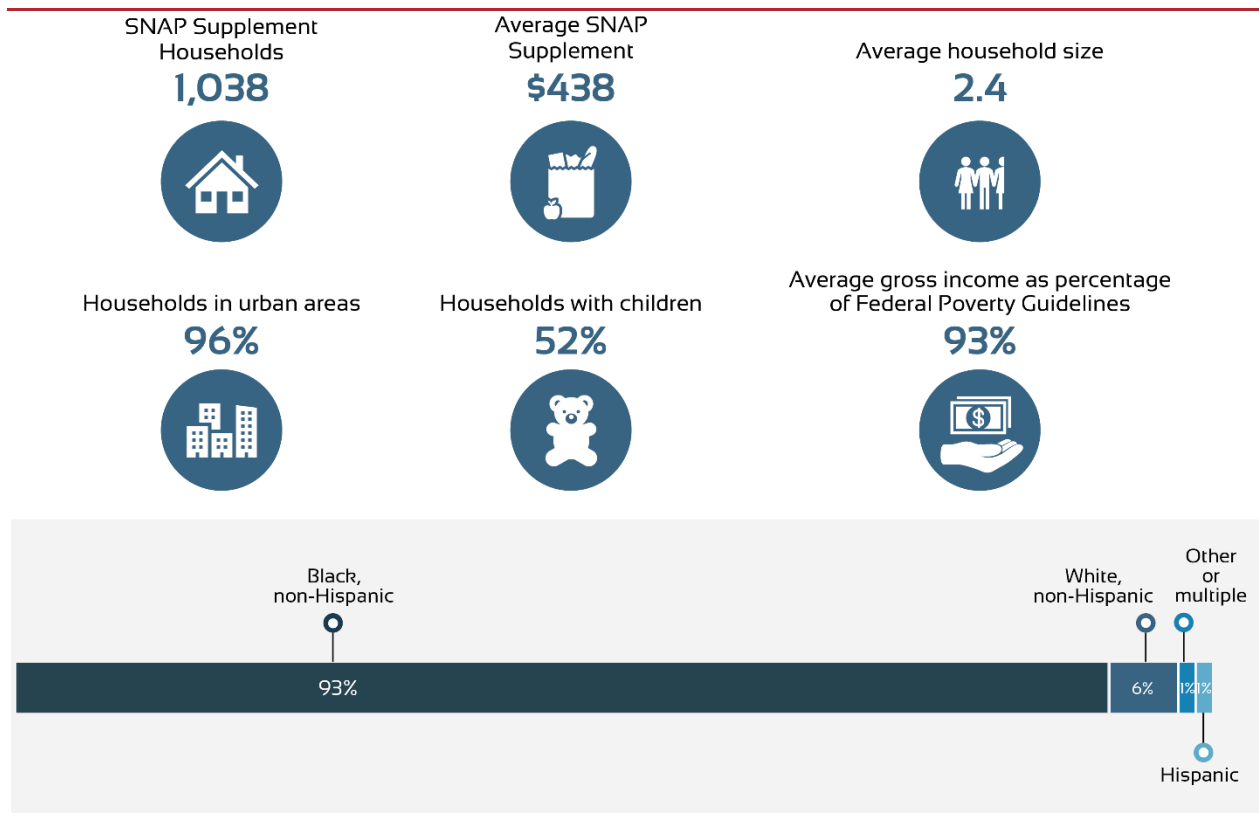
## 6. Household Characteristics by SNAP Disaster Supplement Status: Tornado

SNAP households residing in the D-SNAP counties (or those who worked or owned a business in the D-SNAP counties) were eligible to receive supplemental benefits in response to the disaster. A total of 1,038 households received a supplement following the tornado, representing less than 1 percent of the 645,046 North Carolina SNAP households during the D-SNAP operation period.<sup>12</sup> The average supplement amount, received in addition to the SNAP benefit, was \$172, ranging from \$1 to \$750. Appendix C table C.1.5 presents characteristics of all North Carolina households receiving SNAP in May 2018 by their SNAP supplement status.

Figure 4.13 summarizes the household characteristics of SNAP supplement recipient households during the tornado D-SNAP operation. Of the 1,038 households, 20 households that received supplements did not receive SNAP benefits in May, when the D-SNAP benefits were issued. The study team removed these 20 households from the analysis of household characteristics to facilitate comparisons across D-SNAP and SNAP caseloads (e.g., remove differences in time-varying characteristics such as residence and income) and ensure consistency in the populations included in appendix C tables C.1.4 and C.1.5. Before accounting for the supplement, households had an average SNAP benefit amount of \$438 and 2.4 household members. Most heads of SNAP supplement households identified as Black, non-Hispanic (93 percent); 6 percent identified as White, non-Hispanic. Ninety-three percent of SNAP households receiving a supplement had an income below 130 percent of the Federal Poverty Guidelines. Nearly all households (96 percent) were located in urban areas.

<sup>12</sup> The benefit amount issued supplemented April 2018 benefits but was issued in May.

**Figure 4.13. Characteristics of SNAP Supplement Households, 2018 Tornado, North Carolina**

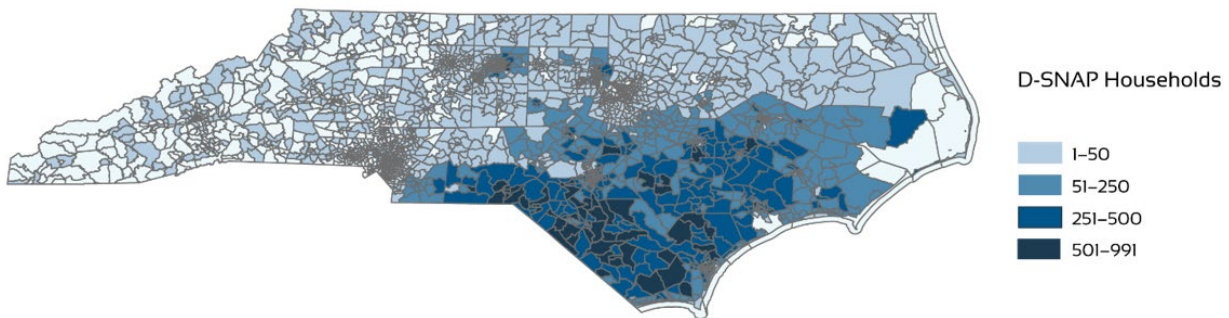


Note: Percentages may not add to 100 percent because of rounding.

## H. Geospatial Impact of D-SNAP

A geospatial assessment of D-SNAP households indicated a wide distribution of D-SNAP beneficiaries through southcentral portion of the State. The number of D-SNAP beneficiary households ranged from 0 to 991 within census tracts in North Carolina. Not surprisingly, the census tracts with the largest number of beneficiaries were in D-SNAP counties from the hurricane. However, the map also indicated some D-SNAP beneficiaries relocated outside D-SNAP counties after the disasters (see figure 4.14).

**Figure 4.14. Number of Households Enrolled in D-SNAP, by Census Tract, 2018 Tornado and Hurricane Florence, North Carolina**



The study team also mapped the average distance of a household to D-SNAP application site. In North Carolina, the average distance to a D-SNAP application site was 8.0 miles (mean, median: 6.6 miles). The closest participants/beneficiaries lived 0.0 miles from a site, while the farthest distance was 256 miles, likely indicating a household that relocated after the disaster. About 5 percent of households lived within 1 mile of a distribution site, while almost half (49.9 percent) lived within at least 5 miles. Of the 49 distribution sites across both disasters, all but 1 had at least some households within 1 mile. The site with the most population within 1 mile had 894 households within 1 mile, indicating wide variation in the populations served across the geography of the disaster.

## I. Data Limitations

The North Carolina D-SNAP system did not track participant disability or employment status.

The study team had intended to assess the proportion of D-SNAP participants who enrolled in SNAP within 6 months following the D-SNAP. D-SNAP and SNAP households were tracked in the same eligibility system; households were expected to receive a consistent household identifier in both programs. Using the household identifier, the study team examined whether any D-SNAP households enrolled in SNAP within 6 months following their D-SNAP participation. No matches were found. The State agency noted this was plausible because the two programs have different eligibility criteria; some participants may also have been displaced to other counties or States as a result of the hurricane. However, the State noted the data were insufficient to definitively conclude no D-SNAP households later enrolled in SNAP.

## J. Conclusions

In 2018, North Carolina operated two in-person D-SNAPs. Staff and community stakeholders noted several areas of the D-SNAP that worked well:

- ▶ **Strong internal communications and teamwork across the State and county offices.** Several respondents noted staff across the agency came together to ensure the success of the D-SNAP. Each D-SNAP site also began the day with a morning meeting led by county leadership; these meetings increased morale among frontline staff and ensured everyone was aware of any updates or changes to operations.



- ▶ **Highly organized D-SNAP application process.** Respondents shared a best practice of using a “theme park” approach to moving clients through the D-SNAP application process. The hallmarks of this approach included (1) keeping clients consistently moving from one station to the next rather than keeping them in one space and (2) informing clients of the next steps and approximate wait times. Staff were also placed throughout the site to share program information with clients waiting in line and orient them to the application process. Several county staff shared they received praise from clients on how quickly lines moved and how well the operation was organized. Use of a prerecorded video standardized information disseminated to clients and thus relieved onsite workers of the need to explain the same information repeatedly.
- ▶ **Emphasis on accommodations for clients needing additional assistance.** Staff at both sites ensured clients received any additional assistance they required. Golfcarts were used to help clients with mobility issues get inside the DSS office, and extra chairs were available for those who needed seating. Applications for individuals requiring accommodations were processed separately to ensure they were able to move through the line more expediently; at one county, a separate satellite site was set up to provide additional accommodations. To the extent possible, counties called upon multilingual staff to serve as interpreters for clients with limited English proficiency; as needed, staff were also able to use a language line. Expectations for next future steps of the application process were shared early to ensure all clients knew what to expect.

However, the D-SNAP was not without its challenges. The most commonly reported challenge for county staff was the high burden of operating a D-SNAP. In addition to processing D-SNAP applications, staff were expected to maintain their regular workload (e.g., process new SNAP applications and recertifications,<sup>13</sup> process application for other benefits). County frontline and management staff shared several ideas to make D-SNAP operations less burdensome for staff:

- ▶ **Online preregistration forms** could lessen the amount of information staff needed to manually enter into NCFast and speed up the application process.
- ▶ **Mass replacements** could limit foot traffic at sites because SNAP clients would not have to request replacement benefits in person.
- ▶ **Telephone interviews** could limit the number of clients at the D-SNAP site and enable staff to process cases more expediently. Several county staff remarked that while they had only operated in-person D-SNAPs in the past, they would strongly prefer a virtual or hybrid option in the future to address the large burden of in-person operations.

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<sup>13</sup> North Carolina requested a waiver to extend certification periods and a waive of periodic reporting requirements for the Hurricane Florence D-SNAP but not the tornado D-SNAP. Even with the waiver in place, staff had to meet timeliness standards for new SNAP applications.

## Chapter 5. Oregon Case Study

The case study assessment of Oregon’s D-SNAP response to the 2020 wildfires included interviews conducted over a 4-week period in January and February 2022. The study team interviewed State agency staff, a group of local office supervisors, a group of local office frontline staff, and two community partners. One community partner brought a statewide view to disaster management, while the other community partner provided localized services to an area heavily affected by the fires. In total, the study team conducted five 1-hour interviews.

Quantitative findings are based on SNAP and D-SNAP administrative datafiles received from the State’s information technology contractor. The datafiles contained information on household composition, economic characteristics, benefit amounts, and geographic location and included data on D-SNAP households that enrolled in SNAP during the 6 months after the disaster.

### A. Wildfires (2020) Overview

On September 7, 2020, wildfires began spreading across Oregon and remained uncontained for several days in the western half of the State. The State issued evacuation notices covering about 500,000 residents—more than 10 percent of the State’s population. The Governor requested an expedited major disaster declaration on September 14, 2020, and the following day the President issued a disaster declaration for the State. Eight counties were declared eligible for IA (see figure 5.1).

**Figure 5.1. Map of D-SNAP Counties, 2020 Wildfires, Oregon**

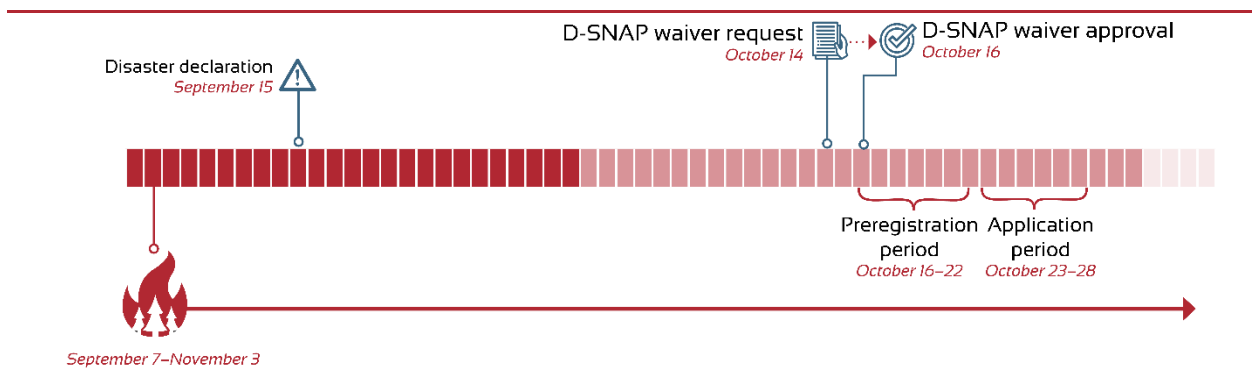


#### 1. Timeline of Events

On October 14, 2020, Oregon submitted a D-SNAP waiver request to FNS to operate D-SNAP in the eight counties eligible for IA and affected by wildfires. FNS approved Oregon’s waiver request on October 16, 2020. The State had an early registration period October 16–22, 2020; the regular application period

was open October 23–28, 2020 (see figure 5.2). The resulting D-SNAP served 168 households. Eligibility workers processed 329 applications and issued \$74,613 in D-SNAP benefits.

**Figure 5.2. Timeline of the D-SNAP Operation, 2020 Wildfires, Oregon**



Source:

## B. General Planning

Oregon Department of Human Services (ODHS) State agency staff are responsible for creating the D-SNAP plan and making annual updates. The plan provides details on the following topics:

- ▶ Communication systems
- ▶ Staff assignments
- ▶ Information systems
- ▶ Staff training
- ▶ Disaster response service provisions
- ▶ Types of D-SNAP that could be implemented and implementation steps
- ▶ Strategies to maintain program integrity (e.g., household liability for overissuances, fair hearings, reporting and reviews, quality control, security, fraud control)
- ▶ Requirements for postdisaster reporting

The State's fiscal year 2021 plan acknowledges a range of disasters that can occur (e.g., tsunamis, wildfires, floods, ice storms) and details approaches for various levels of disaster (local, regional, statewide). The State plan defines five levels of disasters or emergencies and indicates which levels might necessitate a D-SNAP; others may be adequately handled within the regular program. The plan also points to the State's location within the Cascadia Subduction Zone, a 600-mile fault, as a potential cause of a major earthquake disaster.

The D-SNAP plan included information on a pandemic response and a wildfire response, but these two events occurring at the same time added another level of complexity to establishing D-SNAP operations. While references to a wildfire focused on its impact on the community, the pandemic response section of the State plan outlined how State agency staff would communicate with applicants and clients, how applications would be made available and could be submitted, and how staff could work remotely or with the appropriate safety precautions. ODHS planned to leave posters on office doors, provide media releases, and share information with 211 Info and other community and agency partners. The agency also intended to provide applications in ways that did not require personal contact (e.g., online, drop boxes) and could be returned online, emailed, dropped off, mailed in, or faxed. The State planned for

staff to conduct telephone interviews and distribute personal protective equipment if in-person interaction took place. ODHS also identified 15 waivers the State could request to modify practices to conduct more business via the mail and through phone interviews.

## 1. Relationships With Other Stakeholders

Leading up to the 2020 wildfires, individuals outside ODHS did not have an active role in D-SNAP planning. However, the plan did identify key partners, making it easier for State agency staff to reach out and coordinate disaster response efforts. The potential partners ODHS identified in the State plan include a fire program specialist from FEMA, the Oregon Red Cross, the Cascade Region Red Cross, members of the Oregon Office of Emergency Management, and the State EBT Controller.

Prior to the wildfires in 2020, most emergency response staff in Oregon had not seen a disaster of the same magnitude. This spurred a more coordinated and active emergency response in Oregon. ODHS created the Office of Resilience and Emergency Management in fall 2020, and ODHS staff have since developed a relationship with the State's broader emergency management team to obtain access to GIS mapping of areas affected by a disaster. The State has also developed a working relationship with the public utility commission to access data to inform future waiver requests if needed.



**Key Considerations for Annual D-SNAP Plans:** States that have not operated a D-SNAP in many years may need additional assistance to ensure their annual D-SNAP plan can be operationalized, including elements such as staff training and community partnerships.

## C. Event-Specific Planning

Although the State submits its plan annually to FNS, Oregon had not operated a D-SNAP in more than 10 years prior to the 2020 wildfires. State agency staff reflected that the D-SNAP plan in place leading up to the wildfire disaster response did not account for social distancing or the work environment created by the concurrent COVID-19 pandemic.

### 1. Estimating Need

To inform the D-SNAP waiver request, the State used data from the 2013–2017 American Community Survey to estimate the number of households that would be served. Using these data, Oregon estimated the number of households with income less than 185 percent of the Federal Poverty Guidelines and then excluded SNAP households for each county. Oregon anticipated that about 205,000 individuals would be eligible for D-SNAP and \$88,560,000 in benefits would be issued.

The State also fielded a survey of districts affected by the wildfires to identify the needs and resources available in each affected community. The survey collected information on community partners and the number of participants requesting replacement benefits in the branch offices. The districts returned the survey in about a week. Because it had been so long since Oregon conducted a D-SNAP, the State consulted with Louisiana, a State with more experience running disaster response programs. Louisiana's staff shared their experience estimating D-SNAP participation and preparing D-SNAP operations.

ODHS State-level staff reminded all staff they could provide replacement benefits to SNAP participants who lost food in the disaster; this strategy of encouraging staff to provide individual replacements intended to shorten the timeline to begin providing relief to families.

Oregon initially estimated hundreds of thousands of individuals would apply for D-SNAP. However, the State processed 329 applications, served 168 households (408 clients), and issued \$74,613 in D-SNAP benefits. ODHS staff noted other programs and disaster response provisions may have lessened the demand for D-SNAP benefits. For example, foods were distributed through The Emergency Food Assistance Program, and FEMA was already on the ground providing assistance to shore up the local food systems. Because Oregon had not operated a D-SNAP in a long time, ODHS staff thought many potential participants may not have been aware of the program or their potential eligibility, despite the public awareness campaigns.



**Key Considerations for Needs Assessment:** Preemptive identification of sources for the data requested in the needs assessment enables waiver requests to be completed efficiently.



**Best Practices for Planning:** Consulting with States that have D-SNAP experience or expertise provides tangible examples of how to organize and implement a D-SNAP operation, including elements such as data collection.

### **The D-SNAP waiver request**

ODHS staff worked with their FNS Regional Office counterparts to request a virtual D-SNAP operation. At the time of the D-SNAP request, most ODHS staff were working remotely and observing social distancing measures as a result of the COVID-19 pandemic. The State submitted its D-SNAP request on October 14, 2020, and FNS approved it 2 days later.

Although the Regional Office described the D-SNAP request process as quick and timely, frontline workers and community partners questioned the timing of D-SNAP operations. One respondent expressed confusion about why the D-SNAP was put in place approximately 5 weeks after the beginning of the disaster; this delay meant community partners needed to provide gift cards for groceries to affected families. Another respondent suggested the delayed implementation of the D-SNAP contributed to confusion among the public about the types and availability of benefits. And another respondent suggested that a Presidential declaration of disaster with IA should automatically trigger an immediate implementation of D-SNAP, so the State can immediately work to provide for individuals' primary needs.

FNS approved Oregon's request for a virtual D-SNAP but required Oregon to provide additional reporting on the effectiveness of its callout model to contact applicants to schedule their interview.

### **Other waivers and policy flexibilities**

Oregon implemented a flexibility allowing clients to submit payments made with a credit card as eligible disaster-related expenses, regardless of when the household expected to pay the balance. This policy was in contrast to previous provisions that only allowed participants to claim credit card purchases if they were paid off within the month. The State highlighted the record-high unemployment rate because of the pandemic and shared that many families were facing financial hardship, which may result in credit cards being their only method to pay for essential items. Oregon also received a hot foods waiver. Oregon opted not to seek a mass replacement waiver, instead offering replacement benefits to participants who requested them. Because the entire SNAP caseload was already receiving maximum benefit levels because of the pandemic, Oregon did not issue supplements.

## D. Implementation

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After FNS approved the D-SNAP waiver request, the State prepared the D-SNAP application and eligibility verification system, provided training to staff, and worked with community partners to share information and develop a public awareness campaign. The D-SNAP was operated virtually, but ODHS provided many venues for the public to receive in-person application assistance.

### 1. Adaptation to Virtual D-SNAP

Because of the COVID-19 pandemic, Oregon adapted its plans to operate D-SNAP virtually. Even though Oregon had recently implemented virtual operations for SNAP administration and was able to use those staff and operations as the foundation for the virtual D-SNAP, the length of time since Oregon last implemented a D-SNAP added significant challenges.

At the time of the wildfires, Oregon was in the process of rolling out a new management information system, the ONE system, but decided to use the D-SNAP Worker Portal in the legacy system for all D-SNAP cases, even in districts that had begun working in ONE. This decision was based on a desire to use a proven, stable system to deliver disaster benefits. ODHS also put a hold on the rollout of the new system while the State responded to the disaster. However, D-SNAP workers were given access to the ONE system and other State systems, such as the Department of Motor Vehicles database, to check for duplicate participation.

Oregon also prepared local offices to provide in-person application assistance. ODHS made paper Applications for Disaster Food Assistance (DHS 0349) and paper Affidavit of Loss of Food Due to a Disaster (DHS 0349D) forms available to the public. Local offices also played a large role in distributing EBT cards. Some counties offered in-person application assistance at mass emergency response sites. Trained staff were present at the emergency response sites to take applications and interview applicants. Emergency response sites relied on paper applications and electronic applications through the D-SNAP system as equipment became available. EBT cards were distributed at mass emergency response sites, or local offices were notified that a D-SNAP applicant would pick up their EBT card in person.

### 2. Staffing

Shortly before the disaster, ODHS formed a new unit called the Virtual Eligibility Center (VEC). At the time of the D-SNAP, the VEC was staffed by 19 experienced eligibility workers and supervisors who worked remotely. All VEC staff had deep policy knowledge and strong working relationships with one another and State leadership. While VEC staff were trained in D-SNAP eligibility determination and benefit issuance, five concentrated on processing D-SNAP applications and requests for replacements and did not participate in normal SNAP operations during the D-SNAP period.

VEC staff were supported by a centralized workshare team made up of State agency staff with experience organizing statewide workflows on other special projects. Their responsibilities included (1) assigning applications to workers; (2) supporting submission of verification documents; (3) managing the collection of applications and interviews completed in person; (4) responding to questions from applicants and community partners; (5) ensuring adequate staffing resources; and (6) providing daily counts in accordance with internal daily reporting requirements. Most of this coordination took place through an internal SharePoint site. VEC staff were also supported by central management staff, who helped manage workload and ensure integrity.

Local office staff distributed EBT cards and loaded benefits onto the cards, either in person or remotely. Counties that hosted in-person application assistance opportunities at mass emergency response sites recruited eligibility workers willing to volunteer to work at this in-person event, supervisors, and staff authorized to distribute EBT cards. These eligibility workers and supervisors were similarly trained in D-SNAP eligibility determination and benefit issuance.

If the wildfires had led to a high number of D-SNAP applications, ODHS was prepared to mobilize an additional team of more than 500 dedicated eligibility workers to interview and process applications. Plans were also in place to use local area support staff and the statewide EBT replacement team to distribute EBT cards promptly if needed. However, given the actual scope of the D-SNAP, the limited group of full-time VEC employees was able to fully staff the D-SNAP.



**Best Practices for Staffing:** A workshare team, supported by the policy team, created a centralized approach to best serve statewide needs. This centralized team had access to an internal SharePoint site for training materials, resources, and process information. The policy team members also provided real-time answers to policy questions and were easily accessible throughout the application period.

### **Training**

ODHS used two primary strategies to train VEC staff in D-SNAP policies and procedures. The first was a policy memorandum, referred to as a transmittal, that provided details on D-SNAP policies and procedures. Eligibility workers and supervisors often used this memorandum as a reference document throughout the D-SNAP period. Second, ODHS provided a 2.5-hour training that covered the application form, disaster expenses, income and resources, required verifications, interview procedures, and benefit issuance. Staff reported the details of D-SNAP policies and operations; they suggested that routine training on general D-SNAP policy would provide a better foundation for training on the specific details of future D-SNAP operations. State agency staff envisioned using other emergency response trainings (e.g., earthquake preparedness trainings) to remind staff about programs like D-SNAP. ODHS will leverage these opportunities going forward.

Local office staff, including those working at local offices and those who provided in-person application assistance at mass disaster response sites, primarily received training through the transmittal memorandum.

To support VEC staff and local office staff throughout the D-SNAP, the State established a D-SNAP group chat constantly monitored by policy experts. Staff could ask detailed questions about D-SNAP policy and receive answers in real time, and other staff could learn from these exchanges.

### **Disaster-related trauma training**

Community partners and ODHS staff at all levels remarked that many individuals and communities experienced significant trauma because of the wildfires. This trauma showed up in the D-SNAP application process as clients recounted their losses as a part of the application. The trauma was also evident among frontline workers who repeatedly heard stories of loss while conducting interviews. Managers of frontline staff did their best to make sure staff felt supported, had space to discuss the difficulties of working a D-SNAP, and could take breaks from interviews as needed. However, staff and community partners voiced concern about retraumatizing D-SNAP clients through the application process and sought to adapt the application to a format that was sensitive to the gravity of the loss these people experienced. One community partner noted that trauma blocks the ability to think about

details, which may impede the ability to think about application elements like costs incurred. Several community partners recommended that trauma-informed care trainings be integrated into D-SNAP trainings to help frontline workers provide the best service possible to clients.

*“It was really challenging that a lot of people were just out there, losing everything, including pets sometimes, houses burnt on the ground, and their whole life was just gone in a minute. So I find it, yeah, really difficult to deal with.”*

—ODHS staff



**Key Considerations for Training:** Staff and community partners highlighted the need for trauma-informed training. Assisting in the application process in this situation requires staff to ask applicants questions about being displaced and experiencing a traumatic event.

### 3. Public Awareness Campaign

Oregon used various methods to create public awareness about D-SNAP. The State distributed press releases to traditional news media, and radio stations and television channels made public service announcements. The Governor of Oregon visited mass emergency response sites during the D-SNAP operation, which garnered additional press coverage.

The State worked with a variety of community partners. The Oregon Food Bank, a contracted SNAP outreach provider, supported the social media and public information campaign. The Red Cross and other emergency response partners told people receiving emergency support services about D-SNAP. Individuals receiving meals at emergency response congregate meal sites received physical notices about D-SNAP, and shelter liaisons disseminated information. The 211 network, a CBO that helps connect individuals to social services, assisted by informing people about the D-SNAP and connected applicants to ODHS, directing them to eligibility systems where they could apply for D-SNAP.

*“The time window that they give you to get everything processed in, and they have to apply by a certain date, it's so small that I felt like many people could have missed that because they weren't sure where to go. So I know for myself, I saw a lot of people trying to get information out, there was a lot on the news about how to get help and things like that. But I don't know if those people—the people who are going to be uprooted from their homes—may not be watching TV.”*

—ODHS staff

On an informal level, State agency staff and community partners made personal posts on Facebook to help share the information. Word-of-mouth increased the number of in-person inquiries at mass emergency response sites.

Despite the multipronged campaign, staff and community partners shared that many people could have missed it. In particular, they noted the short window of time to promote the program. One community partner thought more information should have been shared via radio (a common source of news for some people in the affected area), along with more targeted messaging based on the geographic area. Respondents emphasized the importance of clarity in D-SNAP messaging, especially since very few people were familiar with the program. At least one stakeholder was interested in seeing more co-locating with ODHS and community partners to facilitate awareness of all types of emergency response support.





**Key Considerations for Public Awareness:** Operating D-SNAP in Oregon was new; both staff and the general population were not aware of the program before the 2020 wildfires. Staff emphasized the importance of bringing awareness to the program by adding information about D-SNAP to brochures or websites, including eligibility details and how the program is triggered.

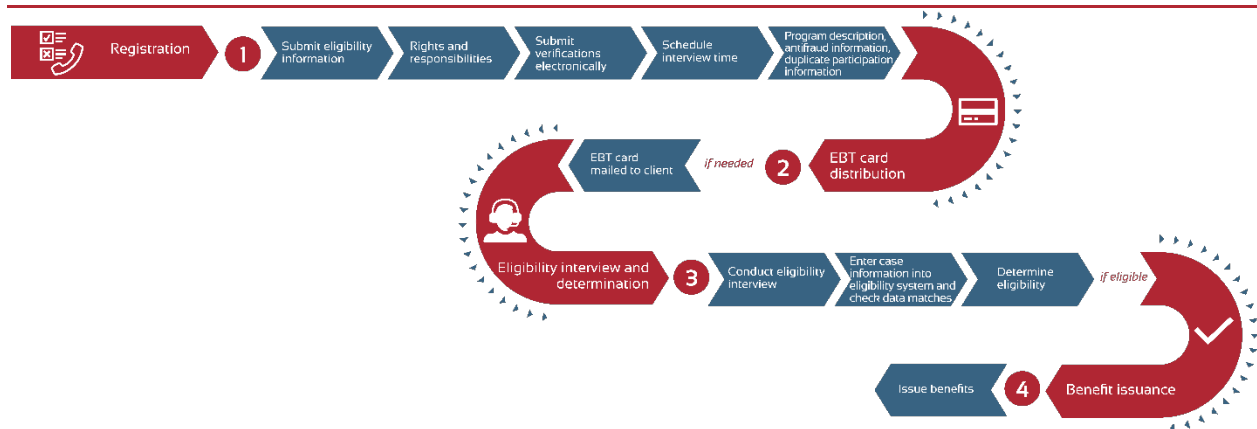
## E. Operations

Although Oregon operated a primarily virtual D-SNAP, the State also provided in-person application assistance at available local offices and mass emergency sites. The combination of virtual and in-person opportunities provided to its residents led to a number of pathways for application, verification, and benefit delivery.

### 1. Application Process

The most common approach to receive D-SNAP benefits was based on the virtual D-SNAP plan. It followed a four-step process that included a newly developed online registration system and a newly designed, decentralized call center for eligibility verification (see figure 5.3).

**Figure 5.3 Oregon’s Virtual D-SNAP Application Process**



ADA = Americans with Disabilities Act; EBT = electronic benefit transfer; ODHS = Oregon Department of Human Services; VEC = Virtual Eligibility Center

#### Preinterview

Oregon encouraged applicants to register during the 6 days leading up to the D-SNAP operation. Registration involved submitting eligibility information using an online form; providing this form did not begin the 72-hour clock for benefit issuance.

#### EBT card issuance

After submitting the online registration form, ODHS mailed an unloaded EBT card to any applicant who did not already have an active EBT card through the Pandemic EBT (P-EBT).

#### Eligibility interview

Applicants were told that an ODHS staff member would contact them by phone on a specific date to conduct the eligibility interview. The centralized workshare team allocated online registration

applications to VEC staff, and at the beginning of the D-SNAP window, VEC staff made outbound calls to applicants to complete the interview over the phone. Outbound calls are typical in Oregon’s SNAP operations, and SNAP staff understand the steps they need to take to reach participants. Because many people may not answer a call from an unknown number, staff left a voicemail describing the purpose of their call and letting the applicant know to expect another call in 5 minutes. The completion of the interview served as the official date and time of application; this marked the beginning of the 72-hour period within which ODHS was required to provide benefits to eligible participants.

*“I think one of the benefits of us being able to do some things remotely was a reduction in stigma attached to any of the programming because the family didn't need to identify that they were using those services; it could be something that they could do privately. And that I think was a huge boon in this—an unintended benefit honestly from that side—but it did allow for people to be more private around requesting those services and gave them a different option.”*

—ODHS staff

### **Alternative application process**

To accommodate applicants’ needs and D-SNAP operations in novel settings, ODHS allowed a range of variations to the standard application process.

**Virtual application after the initial registration period.** During the D-SNAP application period, applicants could submit their applications online even if they missed the initial registration period. ODHS encouraged applicants to apply on certain dates based on the first letter of their last name but did not require applicants to adhere to this schedule. Eligibility workers still used a callout model to contact applicants to schedule their interview, and their application remained pending until the interview was conducted. Approved applicants could choose to have their card mailed or pick up their card at a local office in person. Eligibility workers emailed the nearest open branch office to distribute the card per the participant’s preference.

**Application assistance in local offices.** Potential clients could also receive application assistance at local offices. Although most ODHS staff were working remotely because of the COVID-19 pandemic, all local offices not directly affected by the wildfires remained open to serve clients unable to seek services virtually. Applicants could complete paper applications in the local offices, where staff scanned the application into the system. The application was forwarded to VEC staff, who processed the case using similar procedures as those for applicants who applied online but not during the initial registration period.

**Application assistance at mass emergency response sites.** Oregon’s broader response to the wildfires included establishing mass emergency response sites to provide services for people displaced from their homes. People affected by the wildfires came to these emergency response sites for a variety of services, and ODHS sent several staff to share information about the agency’s programs (e.g., Medicaid, SNAP, cash assistance).

ODHS staff supporting D-SNAP efforts at emergency response sites had paper D-SNAP applications and SNAP benefit replacement request forms. For the most part, applicants were able to complete an application and meet with eligibility workers with little wait time at these sites. Eligibility workers (about three on site per day) could request support through a group chat or from onsite supervisors (two or three on site per day). Data entry and approval were completed on site. Completed applications were taken to the office and scanned at the end of each day.

During the first 2 days of the D-SNAP, the eligibility workers staffing the emergency response site emailed a request to a staff member in a local office to mail EBT cards to eligible participants or directed eligible participants to go to the office to pick up a card. During the last 3 days of the D-SNAP, support staff workers joined the eligibility workers at emergency response sites with an EBT machine to distribute cards and benefits on site. If applicants had already applied online, onsite staff could retrieve applications through the D-SNAP Worker Portal.

## 2. EBT Issuance

As described in the previous section, benefit issuance depended on the application process D-SNAP participants followed. Unloaded (i.e., zero-value) EBT cards were mailed to households that registered online. After VEC workers conducted an interview and determined eligibility, local office staff issued benefits remotely. More than half (56 percent) of D-SNAP applicants used this process to apply. Applicants who did not register online indicated a mailing address or requested to pick up the card at a local branch during their interview. At the mass emergency response sites, staff used a combination of issuing EBT cards on site and relying on local offices to distribute or mail cards. Staff issuing EBT cards at mass emergency response sites or in local offices were physically separated from eligibility workers. Staff double-checked that benefits were on the card.

## 3. Program Integrity

Clients, employees, and community organizations received information about the consequences of committing fraud. Antifraud warnings were included in public messaging campaigns, and signs were posted in all physical locations. ODHS also informed staff that all staff D-SNAP applications would be subject to case reviews after the D-SNAP closed.

Field and central staff flagged cases for extra review if they found questionable information. During the design and implementation stages of the D-SNAP, the State office worked with fraud, hearings, and overpayments teams to designate lead investigators who acted as points of contact for any flagged cases. Staff could ask for additional proof to verify applicants' identity and could also obtain verification through various data matches. Staff checked for participation in SNAP and other ODHS programs. When frontline eligibility workers were uncertain whether to approve a case, a manager was available to make the decision. Separation of duties was maintained by having different staff responsible for interviews and EBT card distribution.



**Best Practices for Program Integrity:** Oregon accounted for staff applying for benefits who would not normally be eligible and assigned a manager or lead worker to review their cases. To ensure privacy, these applications were not reviewed by staff's peers.

## 4. Civil Rights Protections

The State ensured that individuals who needed accommodations were able to complete their applications and obtain EBT cards. Oregon had a language line and bilingual staff available. D-SNAP information and materials were translated into seven languages. State agency staff were also prepared for phone calls with clients who were deaf or had hearing impairments. The State developed partnerships with community members to assist in disseminating information, including the 211 network, the Oregon Food Bank, and the Centro Latino Americano. Applicants were able to apply online in three clicks, over the phone through verbal assent, or in person as smoke and pandemic conditions allowed.

## F. Reporting and Closeout

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The State was able to close its virtual D-SNAP efficiently as a result of the reporting practices outlined in this subsection.

### 1. Daily Reporting

Caseworkers reported their numbers to a manager, and the manager consolidated reports and forwarded the information to the State office. A point person from the centralized workshare staff monitored workers to ensure they finalized the list of clients each day. Eligibility workers only needed to report that D-SNAP applicants had been interviewed as assigned.

### 2. Closeout

The State believes it received accurate data and was able to close out D-SNAP operations quickly. Staff noted that the lower than anticipated volume of applications helped them complete all of their work on time. After the State closed out the D-SNAP program, it asked field offices what worked well and what did not. The information gathered from field offices was incorporated into future D-SNAP plans and trainings.

State agency staff completed and submitted the postdisaster report. In the report, ODHS staff noted that 56 percent of households participated in the online registration period, and 53 percent of households applied electronically through the simplified online PDF application. State agency staff proposed engaging stakeholders and staff or conducting community evaluations to better understand why application numbers were lower than expected.

### 3. Case Reviews

ODHS included the Office of Payment Accuracy and Integrity in early conversations about D-SNAP. This office conducts SNAP quality control reviews and was responsible for conducting case reviews after D-SNAP, including all staff applications. Reviewers attempted to reach households to collect additional data. When households could not be contacted, reviewers conducted desk reviews. When possible, case reviews collected information about when clients received EBT cards to assess timeliness and additional information about the application process.

ODHS reviewed 29 cases (22 percent) of approved D-SNAP applications; of these, 8 cases had no problems, and 5 cases were incomplete reviews. Of the 16 remaining cases, ODHS found 17 household errors and 3 State agency errors. Errors were most commonly the result of unreported or underreported income or resources. ODHS established claims valued at \$8,838.

## G. Characteristics of Affected Households

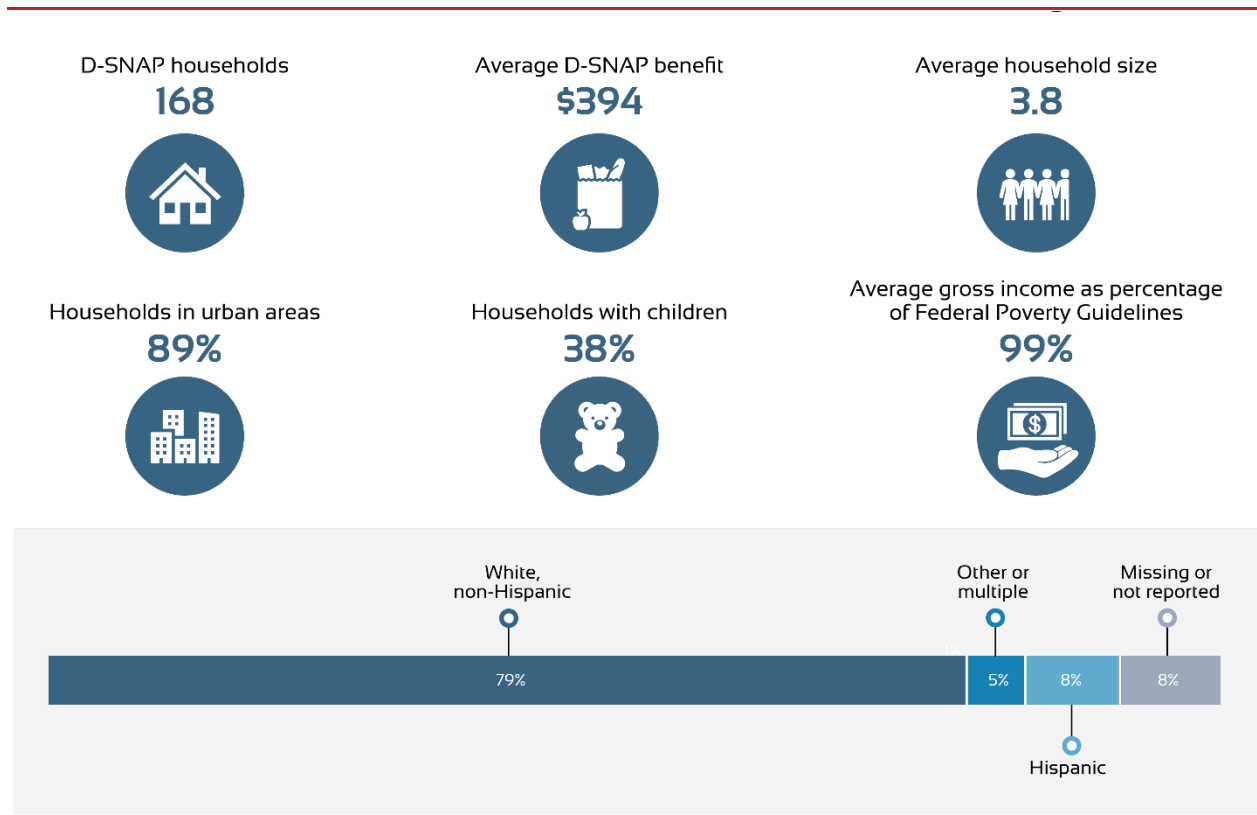
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Administrative data provided the opportunity to examine the characteristics of households affected by each disaster. Oregon was transitioning from a legacy to an integrated eligibility system during the D-SNAP application period; State agency staff noted that some cases may have been lost during the conversion process, leading to an undercount of D-SNAP cases in the available data. Appendix C tables C.1.6 and C.1.7 provide additional data for all D-SNAP and SNAP households during the wildfire D-SNAP.

## 1. D-SNAP Household Characteristics

State eligibility systems recorded 168 households receiving D-SNAP benefits following the wildfire disaster (see figure 5.4).<sup>14</sup> An average D-SNAP household consisted of 3.8 household members; about 10 percent of households included someone with a disability. Almost 90 percent of D-SNAP households resided in an urban area. The majority (79 percent) of the D-SNAP heads of household identified as White, about 8 percent identified as Hispanic, and none identified as Black. The average D-SNAP benefit amount was \$394. Ninety-nine percent of D-SNAP households reported income below 130 percent of the Federal Poverty Guidelines, with 75 percent reporting no income (see appendix C table C.1.6).

**Figure 5.4. Characteristics of D-SNAP Households, 2020 Wildfires, Oregon**



Note: Percentages may not add to 100 percent because of rounding.

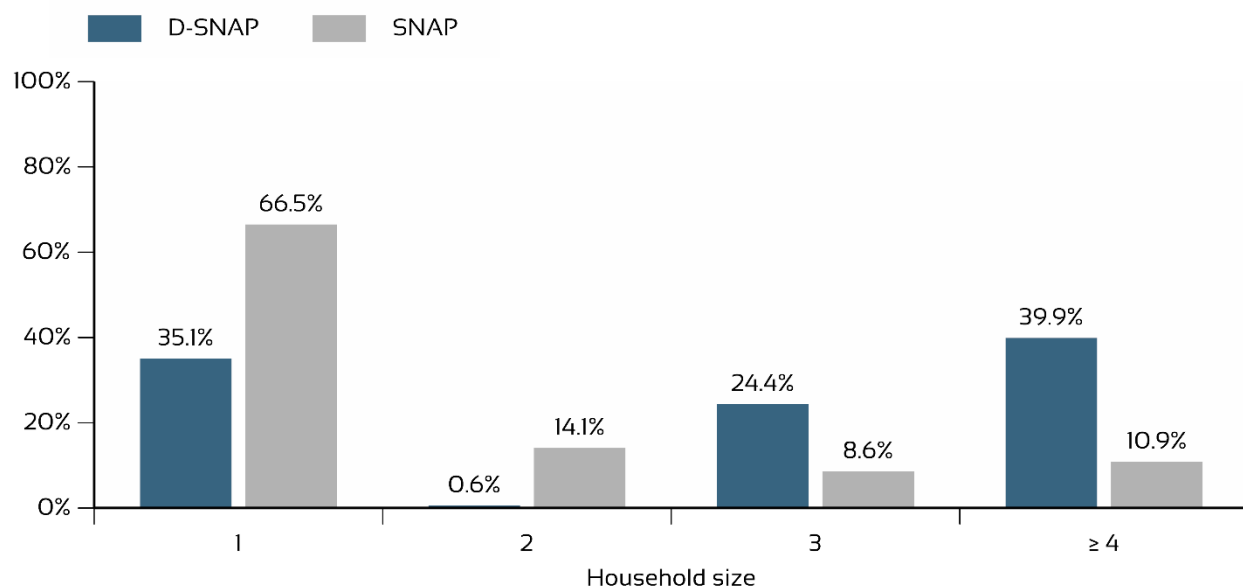
## 2. D-SNAP Household Characteristics Compared With SNAP Households

During the D-SNAP application period, 166,323 SNAP households were located within the D-SNAP counties, representing 45 percent of the total 366,133 SNAP households in Oregon. Compared with SNAP households in the D-SNAP counties, D-SNAP households were less likely to be a household of one (66 versus 35 percent, respectively; figure 5.5). D-SNAP households were more likely to be employed (38 percent) than SNAP households (21 percent), although D-SNAP households were more likely to have \$0 gross income (75 percent versus 33 percent; figure 5.6). Household heads had a similar distribution of

<sup>14</sup> This number includes all unique D-SNAP households observed in September and October 2020. The number of households tracked in the administrative records may differ from other sources because of several factors, including limitations of the eligibility system, edits to the records, and differences in how the study team processed the data compared with the State data team.

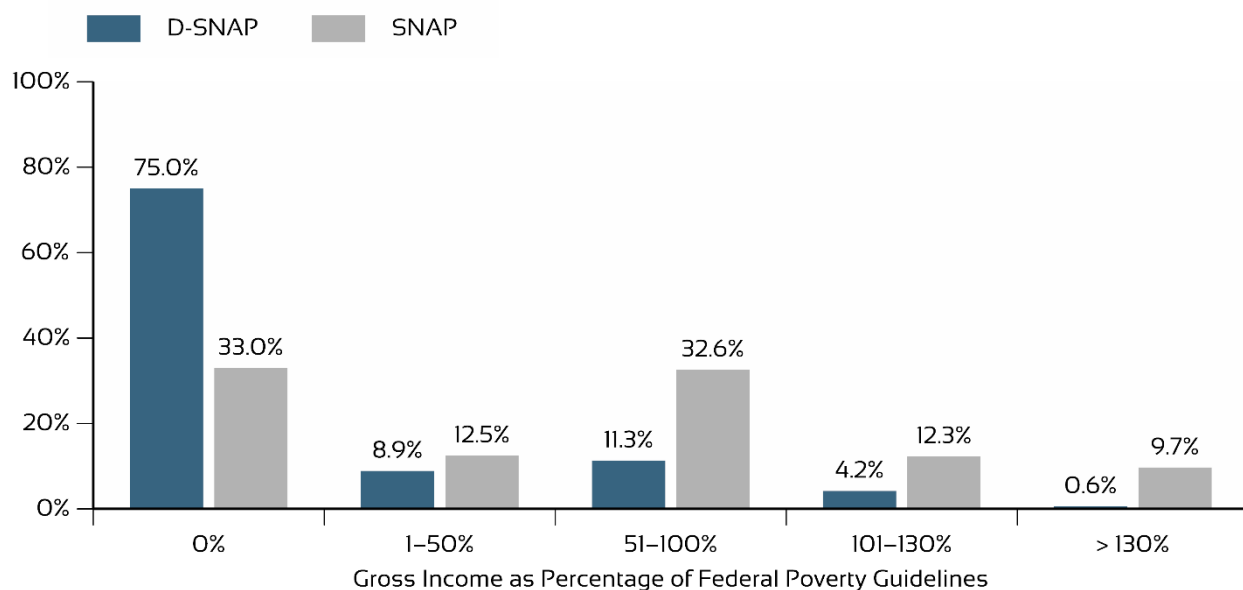
race and ethnicity. In D-SNAP counties, 89 percent of D-SNAP households were located in urban areas compared with 73 percent of SNAP households.

**Figure 5.5. Distribution of Household Size for D-SNAP and SNAP Households in D-SNAP Counties, 2020 Wildfires, Oregon**



Source: Oregon administrative data

**Figure 5.6. Distribution of Gross Income as a Percentage of the Federal Poverty Guidelines for D-SNAP and SNAP Households in D-SNAP Counties, 2020 Wildfires, Oregon**



Source: Oregon administrative data

### 3. D-SNAP Households That Enrolled in SNAP

In the 6 months following the D-SNAP application period, 32 of the 168 D-SNAP households (19 percent) enrolled in SNAP (see appendix C table C.1.7). Sixty-three percent of the heads of household identified

as White, and 22 percent as Hispanic. A little over half were employed, while 44 percent had no gross income. Nearly all households (94 percent) resided in an urban area.

## H. Geospatial Impact of D-SNAP

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A spatial assessment of D-SNAP households indicated that most D-SNAP beneficiaries resided in a small number of the counties deemed eligible for IA. The number of D-SNAP beneficiary households ranged from 0 to 20 within census tracts in Oregon. However, the map also indicates that some D-SNAP beneficiaries relocated outside D-SNAP counties after the disasters (see figure 5.7).

**Figure 5.7. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Wildfires, Oregon**

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## I. Data Limitations

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Oregon was transitioning from a legacy to an integrated eligibility system during the D-SNAP period, which may have contributed to differences in the data provided by the State compared with the data reported in Oregon’s postdisaster report. This transition meant the eligibility system did not reliably identify whether D-SNAP households later enrolled in SNAP; however, the State agency team was able to review the D-SNAP cases manually to determine whether households moved to SNAP in the 6 months following the D-SNAP. For the D-SNAP, Oregon only tracked data for the head of household. Because of this approach, the study team could not determine whether a child or an older adult lived in the household.

## J. Conclusions

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In 2020, Oregon operated a primarily virtual D-SNAP operation with region-specific opportunities for in-person applications. Staff and community partners noted several actions that resulted in positive outcomes in D-SNAP implementation:

- ▶ **Create a centralized approach to staffing** to ensure trained remote eligibility workers can serve clients quickly after their application or online registration is received. Remote eligibility workers were supported by a workshare team and a policy team and had access to an internal SharePoint site for training materials, resources, and process information.
- ▶ **Build a culture of caring** to help frontline staff feel supported throughout the difficult work environment of devastating wildfires and a pandemic. Frontline staff reported being proud to be able to assist with fire relief efforts, and all staff levels in ODHS demonstrated their dedication to their communities.

- ▶ **Provide flexibility** for clients to apply for D-SNAP and staff to meet the needs of clients. Applicants were able to use the online registration, visit open county offices, or go to disaster relief sites or community partner sites.

One of the primary challenges of Oregon’s 2020 wildfire D-SNAP was the limited knowledge of D-SNAP among staff, community partners, and the public because Oregon had not operated a D-SNAP in the 10 years prior to the 2020 wildfires. Staff and community partners identified the following opportunities to improve future D-SNAP operations and increase knowledge of the program:

- ▶ **Provide more training** to staff and community members, particularly trainings that are trauma-informed and speak to some of the main differences that may exist between current SNAP recipients and households that would be eligible for D-SNAP.
- ▶ As disasters in the State become more frequent, **strengthen community partnerships** within the State and across State lines to increase the alignment between the D-SNAP plan and other emergency preparedness initiatives.
- ▶ **Incorporate the lessons learned during the response to the wildfires into the annual D-SNAP plan**, including stronger perspectives from State emergency management staff, additional information on emergency response partners and potential funding streams, and knowledge gained from the Regional Office and other States while preparing for the 2020 wildfires D-SNAP.



## Chapter 6. Tennessee Case Study

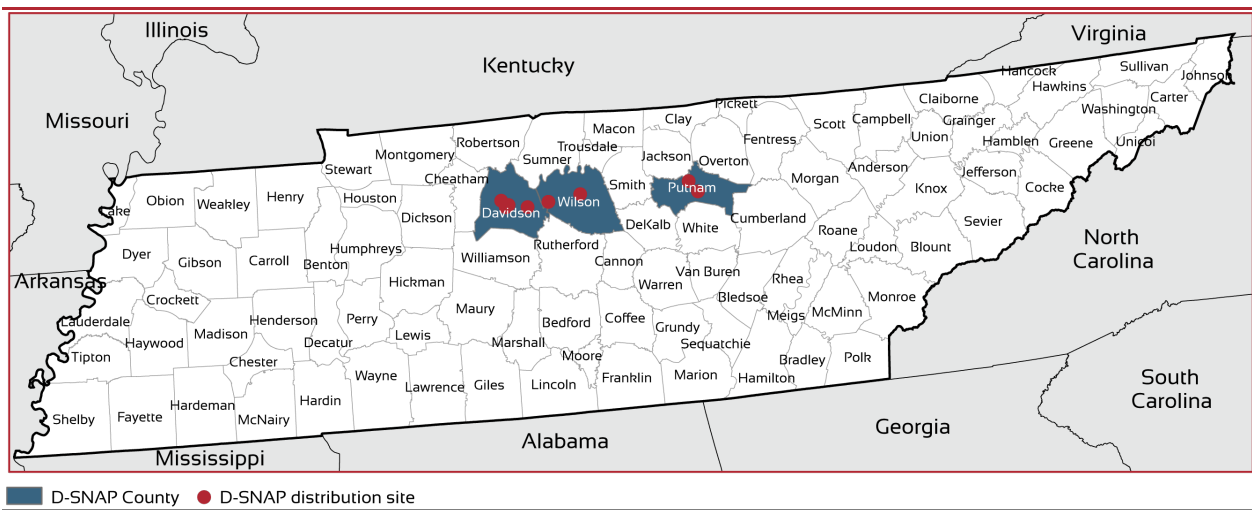
The case study assessment of Tennessee’s D-SNAP response to the March 2020 severe storms included interviews conducted virtually over a 2-week period and in person over a 2-day period in April 2022. The study team completed two interviews with SNAP State agency staff, two interviews with local office supervisory staff, one interview with local office frontline staff, and three interviews with stakeholders (i.e., one emergency management agency, one EBT vendor, and one SNAP State agency former staff). In total, the study team conducted eight interviews ranging from 1 to 2 hours each. This case study is unique because the D-SNAP began with in-person implementation and shifted to a virtual D-SNAP because of the onset of the COVID-19 pandemic.

Quantitative findings are based on SNAP and D-SNAP administrative datafiles received from the State’s information technology contractor. The datafiles contained information on household composition, economic characteristics, benefit amounts, and geographic location.

### A. Severe Storms (March 2020) Overview

On March 3, 2020, Tennessee was hit by severe storms that brought heavy rains, thunder, and high winds. The storms generated a tornado that moved through the middle region of Tennessee, severely affecting three counties. The severe storms and tornado destroyed homes and caused widespread power outages. The President issued a major disaster declaration on March 5, 2020; three counties operated D-SNAP in response to the severe storms (see figure 6.1).

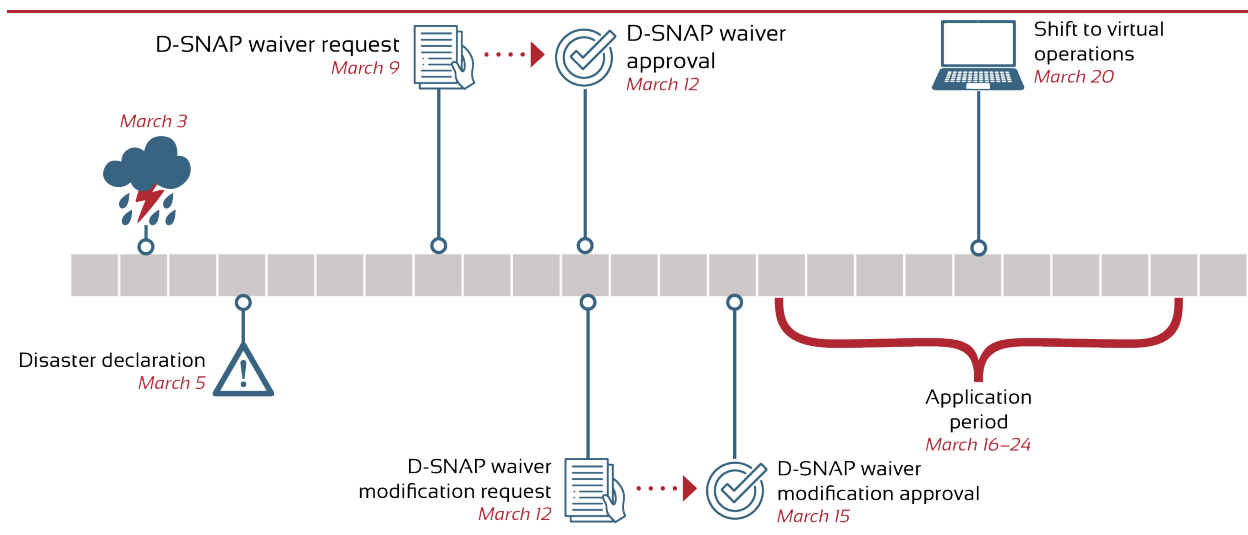
**Figure 6.1. Map of D-SNAP Counties and Sites, 2020 Severe Storms, Tennessee**



#### 1. Timeline of Events

On March 9, 2020, Tennessee submitted a D-SNAP waiver request to FNS and received FNS approval to operate D-SNAP in the three counties eligible for IA; FNS approved this request on March 12, 2020. Tennessee requested a modification to the D-SNAP waiver request because of the rapidly evolving COVID-19 pandemic (see figure 6.2). The resulting D-SNAP served clients from 2,354 households. Eligibility workers processed 3,389 applications and issued \$792,520 in total D-SNAP benefits.

**Figure 6.2. Timeline of the D-SNAP Operation, 2020 Severe Storms, Tennessee**



## B. General Planning

The Tennessee Department of Human Services (TDHS) is responsible for preparing the annual D-SNAP plan. Because Tennessee may be affected by a variety of disasters, the annual D-SNAP plan is generic to ensure it can be implemented regardless of the size or scope of an event. The plan includes information about the State and county offices' responsibilities during an emergency response, staff rosters, application procedures, eligibility criteria, staff training procedures, program integrity and fraud prevention measures, administrative hearings procedures, and checklists for application site review and closeout. When asked about special populations, State agency staff noted that the annual D-SNAP plan makes a concerted effort to focus on the State's older populations and individuals with disabilities, ensuring that planning efforts account for the varying needs and accommodations required to prepare for a D-SNAP.

Tennessee has continued to refine its D-SNAP approach over the course of several disasters in the past 5 years. As part of these refinements, TDHS established a field management team under its annual D-SNAP plan to assist with site selection, site operations, and facilitation of communication between the State and the local management team for the D-SNAP. The intent of this team is to identify and mobilize resources as needed to bring a disaster response to scale. Using input from stakeholders and district staff, the State annually updates its plan with lessons learned and best practices for operating a D-SNAP. DHS receives varying levels of input from its partners and stakeholders to update the State plan annually.

### 1. Relationships With Stakeholders

TDHS relies on other State agencies' partners to plan and execute a D-SNAP. It uses an emergency services coordinator to serve as the liaison between TDHS and Tennessee Emergency Management Agency (TEMA). The TDHS emergency services coordinator is embedded in TEMA in the early planning stages following an event and serves as the primary point of contact to gather information used in the needs assessment. In general, TEMA is not involved in D-SNAP plans or specific preparations before an event. TDHS also has a relationship with the Tennessee Public Information and Legislative Office (PILO), which led the public awareness campaign for the State during the severe storms in March 2020.

TDHS also has a close working relationship with Conduent, the State’s contracted EBT vendor. Conduent has provided EBT services to Tennessee for SNAP and TANF since 2017 and provides EBT services during D-SNAP, including handling and distributing EBT cards to D-SNAP sites. State agency staff receive regular updates from Conduent, especially when process or shipping procedures change.

State agency staff noted it was challenging to explain to community stakeholders the requirements of operating the D-SNAP—for example, that to request a D-SNAP, commercial channels of distribution (i.e., grocery and food retailer) need to be operating and have food available. Community stakeholders did not appreciate that although establishing a D-SNAP immediately after the disaster appears to offer benefits to affected individuals, the program needs affected individuals to accrue disaster-related expenses to determine D-SNAP eligibility.

## C. Event-Specific Planning

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In the hours that followed the severe storms, State agency staff began preparing their needs assessment, waiver request, and plans for training staff to establish the D-SNAP sites. The State agency staff began to implement Tennessee’s response plan and outreach to the counties affected by the storms.

### 1. Estimating Need

State agency staff relied on TEMA situation reports, aerial assessments of the storms’ path, and reports of power outages from the U.S. Department of Energy’s tracking system to complete the needs assessment for the March 2020 severe storms. These sources identified the affected ZIP Codes in three counties. Next, State agency staff reviewed U.S. Census data (e.g., income and household size) for households in these ZIP Codes to estimate the number of residents eligible for D-SNAP benefits. The needs assessment report estimated 1,952 new households eligible for up to \$985,760 in D-SNAP assistance and 27,942 SNAP-enrolled households eligible for up to \$5,333,448 in supplemental benefits. Interviews confirmed that district-level and local staff did not participate in the needs assessment process.

Staff noted challenges as a result of waiting for data from TEMA to complete the needs assessment. State agency staff needed data on the number of people who applied for TEMA benefits to complete the D-SNAP needs assessment and waiver request submitted to FNS, but the TEMA application had to close before the emergency services coordinator could provide data to State D-SNAP staff. When asked if other data might have been more useful, State agency staff did not suggest any other data because the detail from TEMA and the SNAP database were considered sufficient. The data used for the needs assessment for the March 2020 severe storms were consistent with sources used in prior D-SNAPs.

### 2. D-SNAP Waiver Request

The initial waiver request included eight sites selected to operate the D-SNAP (see figure 6.1). Additional information included hours of operation, accommodations for vulnerable populations, application procedures at the site using Tennessee’s D-SNAP system ServiceNow (via laptops and iPads) or paper applications, site staffing, and fraud prevention measures. TDHS finalized and submitted the D-SNAP waiver request on March 9, 2020, 6 days after the disaster. FNS approved this request on March 12, 2020.

On March 12, 2020, Tennessee submitted a modification request to allow participants to complete a preapplication online through ServiceNow. The modification stipulated that after completing their

preapplication, participants would call the D-SNAP line to finalize their application and complete their phone interview. This modification allowed participants to decide whether to go to the D-SNAP sites in person or complete the application process virtually; sites remained open for individuals who preferred to apply in person. FNS approved the D-SNAP modification on March 15, 2020. Staff noted that TDHS was able to quickly gather all the required documentation and draft both the initial D-SNAP waiver request and the modification request; they also noted the quick turnaround from FNS in approving the waivers.

Beginning in March 2020 and for subsequent D-SNAPs, Tennessee has requested permission to operate virtually. Staff commented that the virtual D-SNAP format expedited the application and approval process. State agency staff expressed that including plans for a virtual D-SNAP in the annual D-SNAP plan would be beneficial for States, even though this has never been a requirement. For example, this approach would ease the burden of submitting modifications or additional requests for D-SNAP events.

### **3. Other Waivers and Policy Flexibilities**

Tennessee opted for waivers and flexibilities that mirrored what the State had requested in previous disasters. This included a hot food waiver, timely household reporting of food loss waiver, and expungement of disaster benefits waiver. The State later decided to cancel the expungement of benefits waiver to allow clients to use their benefits until they were spent. Although TDHS did not request mass replacements, it did receive approval from FNS for policy flexibilities related to online submissions of affidavits of food loss and acceptance of online signatures.

## **D. Implementation**

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After FNS approved the D-SNAP waiver request, State and local staff initiated site selection and staffing procedures, launched the public awareness campaign, and began working with partners and stakeholders. Tennessee's 2020 D-SNAP implementation process was unique in that it straddled the release of recommendations and guidelines that encouraged social distancing in response to the COVID-19 pandemic. Tennessee began implementing a conventional, in-person D-SNAP that started with site selection but had to quickly adapt to a virtual D-SNAP operation that was primarily carried out remotely.

### **1. Site Selection**

The TDHS executive management team determined site selection. Once selected, local directors visited their designated D-SNAP site a few days early to complete a walkthrough and determine the procedure for processing benefits at the site. Tennessee opened eight D-SNAP sites across the three affected counties: four in Davidson County, two in Wilson County, and two in Putnam County. The physical space used for sites varied considerably and included multiagency offices, temporary office space, and local SNAP offices.

The following sections focus largely on sites in Wilson County because this location was the focal point for the in-person site visit.

#### ***Capacity and other considerations for in-person sites***

State and local staff agreed the number of D-SNAP sites was adequate for the size, area, and impact of the disaster.

In Davidson County, the State SNAP office and local DHS office were destroyed when the tornado went through downtown Nashville. State agency staff temporarily relocated all their routine SNAP operations and their D-SNAP operations to the surrounding sites, working primarily from the Wilson County DHS office.

In Putnam County, the multiagency Hyder-Burk Agricultural Center at Cookeville began site preparations, including increasing signage and seating, 1 day before the D-SNAP site opened on March 10. The Cookeville site was a high-capacity location with enough space to support several State agencies and serve as a one-stop shop for clients. The site continued to operate with a rotation of district (regional) and local staff over the next 2 weeks, closing on March 24.

Wilson County operated two D-SNAP sites: the Mount Juliet location at the Goodwill Career Solutions Center and the Wilson County DHS office. The Mount Juliet site included a waiting room and space to set up various stations. Despite the accessibility and physical accommodations of this site, staff mentioned technical challenges, such as ongoing connectivity issues. Prior to opening, site staff noted potential issues with the metal building structure and worked with the State IT department to strengthen internet connectivity at the location for staff and clients. Both sites were set up to operate at a lower capacity than the Putnam County site. These site locations offered accessible parking spaces, large parking lots, and access ramps at building entrances.

The Wilson County site at the county's DHS office was directly in the path of the tornado but only sustained minimal damage to a portion of the roof. The office was closed for damage assessment on March 4 (1 day after the tornado) and reopened on March 5. D-SNAP staff experienced few delays in setting up the D-SNAP site, which opened on March 11, 2020.

The Wilson County DHS office afforded several key advantages. The primary advantage was staff and client familiarity with the location. Local staff noted that clients in the area were more familiar with the Wilson County DHS office location than with the Mount Juliet site and pointed to the higher volume of traffic at the Wilson County office as evidence. For staff, the Wilson County DHS office continued to provide access to files, supplies, and printer/copier/scanner equipment; reliable connectivity; and the benefits of operating in a familiar environment. Wilson County DHS office was designed to meet ADA/civil rights compliance, offering an air-conditioned facility with an indoor seated waiting area, access to drinking water (no snacks provided), and wheelchair-accessible bathrooms with infant changing tables. Access to the office was located immediately in front of accessible parking spaces and offered level ground between the parking lot and office entry (no curb). Local staff noted the large parking lot of more than 100 spaces had no physical obstructions. However, local road closures hindered transportation to the site for 2 weeks after the tornado event. Staff did not report any issues with security or safety at the location. After the D-SNAP transitioned to a virtual implementation, the Wilson County DHS office remained open for appointments to provide in-person assistance and conduct eligibility interviews.



**Best Practices for Site Selection:** Familiarity with and awareness of D-SNAP site locations can drive program participation. D-SNAP operators should use county DHS offices and locations known to community residents and highlight D-SNAP site locations more explicitly in public awareness campaigns.

## **Closeout of in-person sites as a result of the COVID-19 pandemic**

Tennessee opened eight D-SNAP locations, with some sites permanently closing only 48 hours into the D-SNAP period and other sites closing in accordance with the nationwide lockdown associated with the COVID-19 pandemic. The closeout process was largely influenced by traffic volume, and the State provided 12- to 24-hour notice to site staff and instructions for closing out the site.

For example, the Goodwill location in Mount Juliet closed 3 days after opening. The site had not received any clients on the previous 2 days, and staff were informed in the morning of the last day that the State would likely be closing the site at the end of the day unless they saw a change in the number of clients seen. The closeout process for other sites was driven largely by the increasing concern about the pandemic and the shift to a virtual delivery. The Wilson County local office D-SNAP site opened on March 11 and closed on March 20. However, the Wilson County DHS office remained open and assisted community members by appointment with reduced staffing.

## **2. Adaptation to Virtual D-SNAP**

State agency staff said Tennessee was interested in moving toward a self-service option before the March 2020 D-SNAP, and the State worked closely with the TDHS IT group to implement this option. The severe storms and the evolving pandemic served as catalysts to rapidly advance this technological innovation for Tennessee's D-SNAP. Following the severe storms, the IT group moved quickly to set up ServiceNow and launch the platform to support the D-SNAP. The decision to select ServiceNow as the platform to use for the D-SNAP stemmed largely from pre-event discussions.

On March 20, 2020, Tennessee formally shifted to a virtual D-SNAP, using the ServiceNow platform. In the shift to virtual, clients completed the registration step online, followed by interviews and verifications conducted over the phone.

Staffing needs also shifted and became centralized through the Family Assistance Service Center (FASC) to provide dedicated staff to focus on and help with the virtual D-SNAP. The FASC was staffed by State eligibility counselors (ECs), who assisted with the interview and verification process, similar to the in-person D-SNAP operations. The State provided electronic just-in-time training for additional local county staff to respond remotely for high-volume periods when additional capacity was needed to answer calls. Adding staff greatly reduced the burden on local staff and enabled individuals to return to their county offices to resume routine activities under the evolving pandemic conditions.

The shift to virtual D-SNAP highlighted the disadvantages associated with technology, including limited connectivity and challenges with accessibility. These barriers primarily affected individuals over the age of 65, individuals with disabilities, and those experiencing housing instability and homelessness because they lacked access to or familiarity with technology. State agency staff also noted intentional design changes and revisions made to the original ServiceNow interface to accommodate the needs of vulnerable populations. Shortly after the transition to virtual, clients were able to check a box to identify individual needs or request accommodations, which helped State agency staff proactively address client needs over time and improve reporting accuracy. In a few cases, individuals encountering challenges were encouraged to visit the office locations in person, where they received IA with online registration and document uploads.

### 3. Staffing

The State provided D-SNAP site directors with the number of staff needed to operate each site successfully. D-SNAP site directors were responsible for determining how to meet the staffing requirements for each site. The staff included greeters, assistance staff (to help clients complete forms), ECs, staff for EBT issuance, and supervisors to assist with the workflow.

At its peak, the Wilson County office reported 13 ECs, filling all available cubicle spaces. Staff who greeted clients at the door and assisted with initial forms reported minimal wait times. Even during peak times, when all case managers were with clients, counselors were able to see clients at a rate of one per hour. Most of the D-SNAP sites were staffed from DHS offices in neighboring counties to support the continuity of regular office operations. In Putnam County, staffing of the Hyder-Burke location was filled by district (regional) and local staff. As a result, State and county offices did not have to hire temporary staff. The sites continued to operate with a rotation of local staff through March 24, when the D-SNAP transitioned to virtual. In addition to the staff working at local sites, local staff reported that the presence of a centralized team at the State level to support operations was very helpful. The centralized team ensured operations and communications were streamlined.

#### Training

Following the severe storms in March 2020, the State set up an online training for all staff assigned to D-SNAP. Virtual trainings helped staff establish a common understanding of the disaster response and the steps to be taken. The training was recorded to ensure consistency as additional staff were assigned. Training consisted of several modules, offering a more in-depth approach than the annual FNS D-SNAP trainings. Staff reported the training clearly identified roles and processes.

The State expanded its D-SNAP training for local staff to focus on the practicalities and procedures of operating D-SNAP sites. For example, the training included a day focused on D-SNAP policy and another day focused on completing a case in the ServiceNow system. Local staff noted the utility of keeping printouts of the training PowerPoint slides at their desk. They also highlighted the checklists from the training that helped them complete the paper applications and determine eligibility more accurately.

Although the training was informative, staff felt the practical experience of working in a D-SNAP helped them build knowledge and experience when they moved from one D-SNAP location to another. Staff from the same offices reported the added benefit of establishing rapport and trust, while new staff adapted to the team dynamics of the sites. These latter aspects may be more important for an in-person D-SNAP than for virtual D-SNAP operations.



**Key Consideration in Staffing:** Staff emphasized the importance of having experienced staff work in the D-SNAP. For newly hired staff, the lack of familiarity with D-SNAP and SNAP created confusion and challenges.

### 4. Public Awareness Campaign

PILO was responsible for the development and distribution of the public awareness campaign. The campaign provided information about the physical, in-person components of the D-SNAP operation, D-SNAP site locations, hours of operation, and eligible counties. The State office and PILO created media and press releases, websites to inform the public, posters to hang at local offices, and social media messaging.

Before opening any of the physical sites, the State office activated a D-SNAP hotline for residents to call for general assistance. The hotline used an existing call line to the FASC that had not been previously used for routine SNAP activities. When Tennessee implemented the virtual component of its D-SNAP, this call line became the primary access point for applicants to complete their interviews and move forward in the D-SNAP application process.

The perceived success of the campaign was mixed. While both State and local staff agreed the public awareness campaign was sufficient given the time constraints, local staff said communications and public awareness need improvement for future events. Staff at the local Wilson County office did not know how clients became aware of D-SNAP services. Several staff noted that people just “know” to come to the office. In contrast, residents in Putnam County did not have a familiar location and needed to be better informed of their D-SNAP eligibility. Local staff in Putnam County noted community members did not understand how to apply for the D-SNAP because the D-SNAP information lacked clarity. The State and local staff thought this confusion could be attributed to the short application window and limited discussion of the process in the community.

*“With the people in Putnam County, it felt like there was a misunderstanding of what they were supposed to do ... how they were supposed to apply, and what they were applying for.”*

—State agency staff

Local staff also suggested the misunderstanding stemmed from the community not knowing how the D-SNAP differed from SNAP, noting some confusion because the D-SNAP includes the name SNAP in its title. Staff also shared anecdotal comments that residents may have believed they needed to be on SNAP to receive D-SNAP benefits. Local staff also brought up the stigma associated with public assistance: People who have never depended on public assistance could have difficulty admitting they need help. They said the virtual D-SNAP helped reduce that barrier because residents did not need to appear in person at an office. Although this issue does not entirely fall within the public awareness efforts of the March 2020 D-SNAP, it does relate more broadly to the overall awareness of the D-SNAP.

For the virtual D-SNAP, the campaign materials were revised. A link to ServiceNow and the hotline number were added. The public awareness campaign continued to include brief details on eligibility requirements. Local office staff noted that a large part of public awareness was driven by community members who helped spread information about D-SNAP to neighbors who may not have been connected to social media or more traditional media outlets. One staff member noted the importance of social media, which they felt was notably better than newspaper and radio outreach used in earlier D-SNAPs. Staff suggested educating the public before a disaster strikes as part of emergency preparedness activities to increase awareness of the program before a disaster declaration and D-SNAP request.

## 5. Role of Partners and Other Stakeholders

The State worked closely with TEMA through its emergency services coordinator to establish and maintain a TDHS presence during the coordination of the overall emergency response to the event. TEMA also assisted with general outreach and promotion of the D-SNAP through its Multi-Agency Response Center, the disaster response centers, and general communications from the Department of



Health Services’ Public Information Officer. The State also worked with Goodwill Industries to identify and set up the Mount Juliet site.

*"Probably the site that got the most traffic and was the most consistent that stayed open the entire time was the Honey Alexander Center [in Davidson County]. They had multiple rooms that we could use, they had adequate parking, they were located downtown and ... I don't think very far from the office location, but I don't know national demographics as well because I lived in East Tennessee, but it didn't seem that they were very far from the county office. They were a little bit more used to foot traffic and serving a vulnerable population, and so they were ... a really good partner. "*

—State agency staff

## E. Operations

This section describes the D-SNAP application process, EBT card issuance, and the process for ensuring program integrity. The section also highlights the transition and slight changes in D-SNAP operations as it moved from in person to virtual.

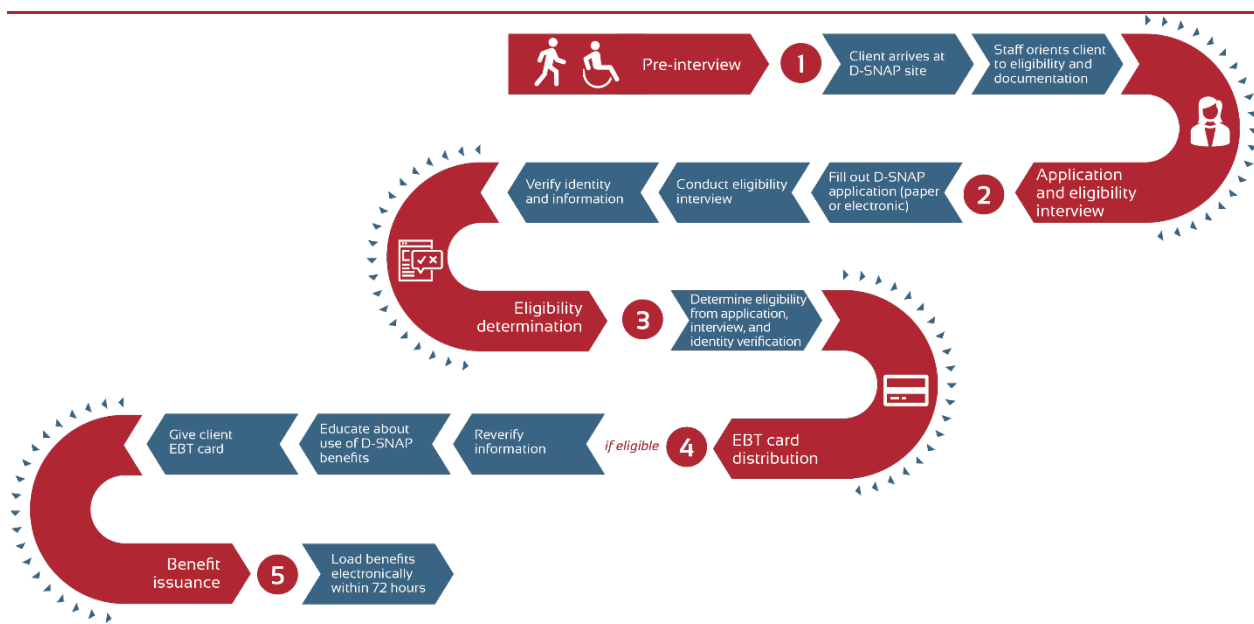
### 1. Application Process

The primary differences between the in-person and virtual D-SNAP emerged under steps 1–3 as part of the initial client intake and application process (see figure 6.3).

#### In-person D-SNAP operations

Across all D-SNAP sites, the application process followed the same sequence of steps: the application process, eligibility interview, verification, and issuance of benefits. Figure 6.3 presents an overview of the in-person D-SNAP application process in Tennessee, focusing on the application process implemented at the Wilson County DHS office. The process was similar in all other locations.

**Figure 6.3. Tennessee’s In-Person D-SNAP Application Process**

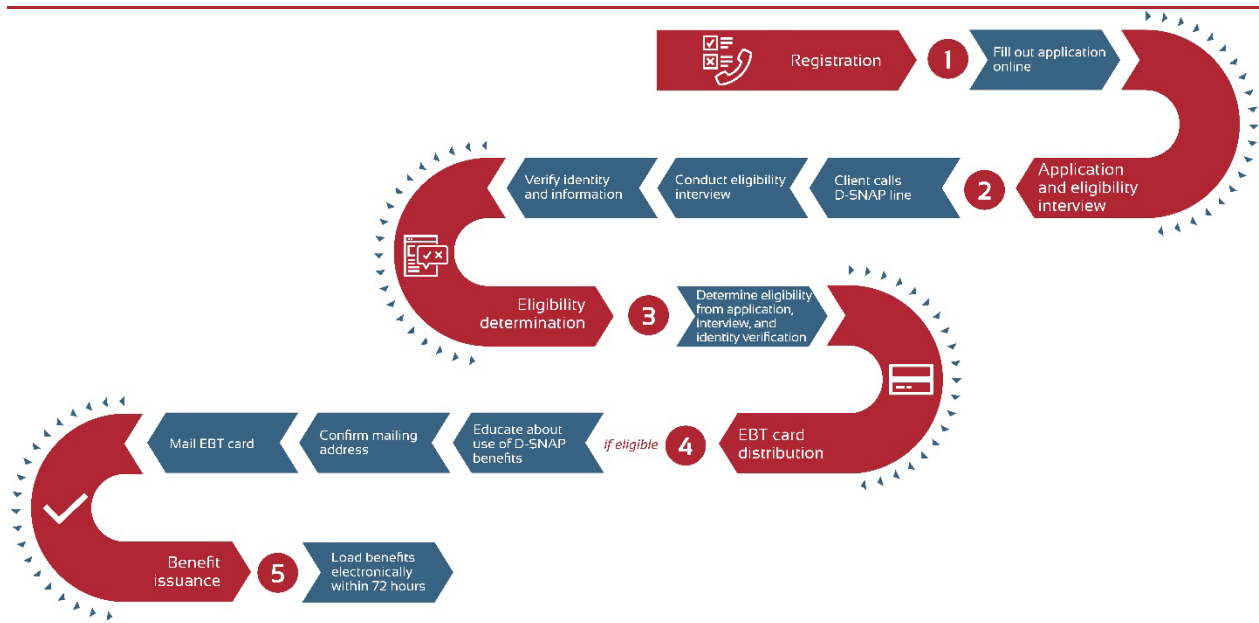


- ▶ **Preinterview:** Upon clients' arrival at the D-SNAP site, the eligibility assistant (EA) served as a greeter and determined whether clients needed assistance with D-SNAP or regular business (e.g., SNAP, Medicaid). If the client wanted to apply for D-SNAP, they received a copy of the application and were directed to the lobby/waiting area. The lobby/waiting area included a table with educational materials, rules and requirements, affidavits (for food loss), and other relevant materials. When asked about compliance with ADA and civil rights laws, staff at D-SNAP sites said they provided accommodations as needed, including assistance with completing forms. These needs were assessed immediately by the staff greeter when clients arrived and addressed as needed.
- ▶ **Application:** Initially, paper applications were printed for clients. Tablets were introduced later as the online system became available. Once the client completed the application, the EA reviewed it to ensure it was complete. The EA notified the EC, and the client was directed to the waiting area until the next EC was available. Staff noted that waiting times rarely exceeded 1 hour during peak traffic.
- ▶ **Eligibility interview and identity verification:** ECs escorted clients into the office space to conduct the eligibility checks and interviews. Although the interviews were short, lasting 5 to 10 minutes, ECs were also responsible for the more time-consuming task of verifying clients' identity (using the identification provided and Lexis-Nexus to confirm) and work information (using The Work Number, a State database). ECs also checked for duplicate participation in ACCENT (Tennessee's SNAP eligibility system) and reviewed the affidavit of combined food loss and property damage. Clients remained with ECs while these checks were completed.
- ▶ **Eligibility determination:** To determine eligibility and mitigate fraud, the State identified three points in the process where staff checked for duplicate participation in SNAP and verified eligibility. First, as described above, ECs checked participation during the interview and verification process. Second, site managers or State agency staff checked and verified eligibility before handing the client the EBT card (in-office or mail distribution). Third, before issuing the benefits (i.e., loading the card), State agency staff reviewed the application and checked again for duplicate participation. When ECs could not verify the applicant's identity or work details, they took client statements. If any issues or questions arose about eligibility or verification, ECs could refer the case to a program integrity staff member on site for additional review.

### **Virtual D-SNAP operations**

After the transition to virtual operations, the application process began with online registration, followed by eligibility phone interview and electronic application, verification, and finally issuance of benefits. The introduction of ServiceNow as the initial entry point for clients supported a consistent D-SNAP application process. Figure 6.4 presents an overview of the virtual D-SNAP application process in Tennessee, highlighting the differences in the first three steps.

**Figure 6.4. Tennessee’s Virtual D-SNAP Application Process**



- ▶ **Registration:** Under the virtual D-SNAP, ServiceNow became directly available to clients, enabling online access to the registration process and the completion of the phone interview at the applicants’ convenience. The online registration process also enabled individuals to register their information in the system once and allowed for updates for future D-SNAP applications.

*“And this way you can apply in the middle of the night. [ServiceNow] is 24/7, and then [clients] can call when it’s convenient to [them], not waiting in line and having to wait on somebody to get done to see you. So, I just think it’s a lot better process.”*

—State agency staff

- ▶ **Application and interview:** For reporting purposes, registrations were not considered to be applications until staff completed the phone interview with clients. In the shift to the virtual D-SNAP, ServiceNow incorporated a Lexis-Nexis identity verifier, which enabled an expedited identity verification that added a confirmation number to the application. Each applicant in the household was also screened individually by staff to ensure they lived within the affected area; staff cross-checked addresses with the TEMA-provided ZIP Codes.
- ▶ **Eligibility determination:** As part of the eligibility and program integrity checks, staff cross-checked duplicate participation between ACCENT (the State’s SNAP eligibility system), ServiceNow, and EPPIC (EBT administration system). These checks determined whether the clients were active SNAP participants or had a pending application.

## 2. EBT Card Issuance

- ▶ In person: During a traditional, in-person D-SNAP, Conduent provided the D-SNAP EBT cards in bulk to the State districts for D-SNAP events. EBT cards were locked in the director's office, with limited access to the cards. Once the client's eligibility was verified and approved at the in-person D-SNAP site, the client was escorted to another room to receive their card. A staff member reviewed EBT rules and guidance and gave the client the EBT card, informing them that their benefits would be loaded onto the card within 72 hours. Site staff were responsible for maintaining a log of the cards handed to clients. As part of closeout, all D-SNAP sites were responsible for returning remaining EBT cards and completing the chain-of-custody paperwork for the EBT card log. State agency staff then reconciled card inventories and logs. Staff did not report any issues managing card inventory.
- ▶ Virtual: In the transition to the virtual D-SNAP, Conduent took on a more active role managing the issuance of D-SNAP EBT cards directly to clients. Interviews with both State and vendor staff acknowledged the importance of communication and coordination, particularly the advance notice of the transition and ability to prepare vendor staff ahead of issuance. After a client's D-SNAP application was approved, Conduent received the client's home or mailing address and was required to initiate distribution of the EBT card within 72 hours. Conduent's revised role increased the separation of duties, providing the opportunity for batch processing of cards once eligibility was verified and approved. Staff reported that most clients received their cards within 24 to 48 hours.



**Best Practices for Issuance:** State D-SNAP staff worked closely with the EBT vendor, Conduent, and communication frequency significantly increased before the transition to virtual. This preparation was critical to meeting the program requirements for EBT distribution.

Following the card issuance and approval, State agency staff completed an additional review of the application to confirm and load the benefits to the client's EBT account. This step of the process remained the same throughout the D-SNAP event, reinforcing program integrity and safeguarding against potential financial loss compared with preloaded cards. Staff did not report any challenges with the process of issuing EBT cards, in person or virtual.

## 3. Program Integrity

The State D-SNAP staff employed a series of checks and reviews to prevent fraud and ensure program integrity. ECs were required to enter notes in ServiceNow to summarize the information acquired from the client, which aided the case review process. These notes detailed the verification information staff asked for and whether the information was provided, including damage reported by the client, whether the client was a State employee, and whether the client was on SNAP at the time of the interview.

Tennessee's program integrity process included a series of steps to verify questionable applications, as outlined below.

### **EC verification**

If ECs identified a questionable application during the in-person D-SNAP, they completed the interview but left the case pending and referred it to the program integrity staff. In these instances, the program integrity staff reviewed the application and determined whether it was associated with an older case, a recent case closure, or the client was eligible for D-SNAP because the client's SNAP application was still

pending (i.e., no duplication). The program integrity staff member then provided the EC with their final determination: Either the application could be approved, or the application could be denied because fraud was detected.

During the virtual D-SNAP, ECs transferred clients' calls to the program integrity staff, who proceeded through the eligibility and verification process. In some instances, the program integrity staff called clients back to continue the application process. State agency staff recalled only one instance of a questionable case referred to the program integrity staff. They determined the case was questionable based on the applicant's behavior and responses to questions during the interview.

### **Separation of duties**

At in-person, physical D-SNAP sites, staff maintained separation of duties by having clients meet with different staff in a different part of the office to complete each part of the process. For example, once approved, clients moved to another room, where a staff member handed them their EBT card. These cards were secured in a locked compartment in the director's office, and three staff were tasked with distributing the cards.

The separation of duties was also maintained during the virtual part of the D-SNAP: (1) clients completed their online registration; (2) clients called the hotline to complete their interview; and (3) if approved, the EBT vendor sent the cards directly to clients. During the virtual part of the D-SNAP, Conduent handled the EBT issuance step entirely.

Staff mentioned they did not experience many challenges related to program integrity; rather, the challenges they encountered were procedural. When the D-SNAP moved to virtual, State agency staff realized that ServiceNow was allowing individuals to create more than one account (i.e., applicants completed more than one online registration in the system) using different email addresses. Staff quickly noticed these duplication errors and shifted to using SSN instead of an email address to verify a person's account. If SSN was not provided in the online registration form, staff used the name and date of birth to identify duplicate accounts. To safeguard against the issuance of duplicate benefits, the ServiceNow system does not allow D-SNAP staff to approve a case until the staff member resolves the existence of multiple accounts. When asked about fraud cases, State respondents reported that no fraud cases were prosecuted.

## **F. Reporting and Closeout**

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### **1. Daily Reporting**

While Tennessee conducted its in-person D-SNAP, local staff relayed daily site reports over the phone, and State agency staff aggregated counts recorded in each site's daily reporting log. This approach was consistent with reporting for previous events. With the shift to virtual, daily reporting adapted as it moved to the online ServiceNow system; reports from the system included more precise detail on the number of preapplications received, the number of online registrations from outside the disaster counties, and other metrics available within the system. State agency staff were able to generate daily and summary reports to meet the reporting requirements in a more timely manner. With the added detail, State agency staff noted the number of pending cases routinely changed between daily reports because of approvals from an earlier day of the week. Staff noted that people who registered online were not counted as part of the application counts, contributing to a constant change in reporting numbers. Final case reporting combined the daily reporting logs from D-SNAP sites and the FASC call

center to report totals directly to FNS. State agency staff completed the final D-SNAP reporting requirements with minimal input from local and district staff.

## 2. Case Reviews

State D-SNAP staff assigned to program integrity conducted a case review for 0.5 percent of D-SNAP public cases and 100 percent of employee D-SNAP cases. The review of D-SNAP public cases began with case identification based on data exported from ServiceNow. To ensure a random selection, staff reviewing cases alternated between selecting 20 cases and skipping 20 cases to identify cases for review. State agency staff also confirmed that all D-SNAP employee cases were reviewed.

State and local staff did not report any challenges with closeout or reporting requirements, nor did the case reviews identify any issues of fraud among the cases. The most common types of case errors were related to ECs' incomplete case notes documenting the verification process and the extent of the damage the participant reported. In these instances, the applicants were still awarded benefits if they met the eligibility criteria. For subsequent D-SNAPs, State agency staff noted that they developed a guide for ECs to document their case notes.



**Best Practices for Case Reviews:** To reduce the number of inconsistencies in case notes, State agency staff developed a guide for ECs to support case notes and documentation.

## G. Characteristics of Affected Households

Administrative data provided the opportunity to examine the characteristics of households affected by the disaster. Tennessee tracked D-SNAP and SNAP enrollment during the D-SNAP application period in two separate systems. Appendix C tables C.1.8 and C.1.9 provide additional data for all D-SNAP and SNAP households during the severe storms D-SNAP.

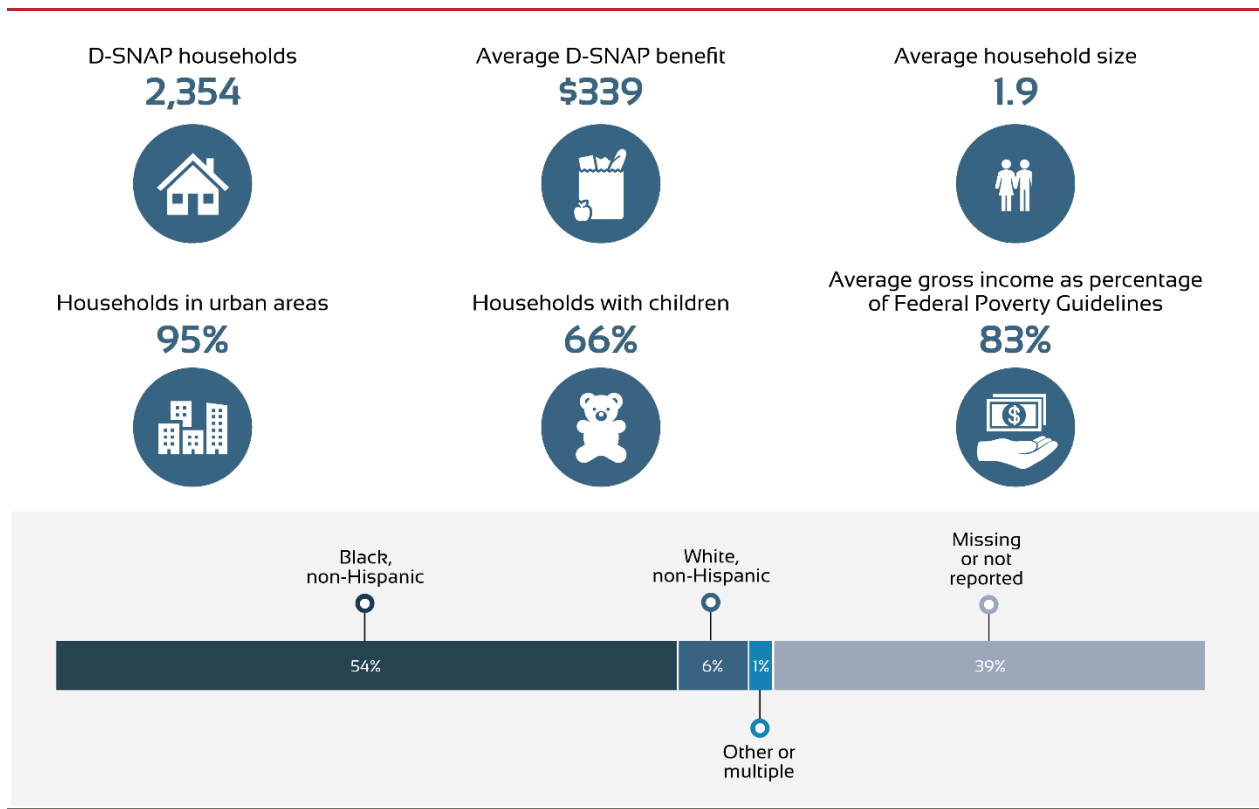
### 1. D-SNAP Household Characteristics

State eligibility systems recorded 2,354 households receiving D-SNAP benefits following the severe storms (see figure 6.5).<sup>15</sup> An average D-SNAP household consisted of 1.9 household members, with nearly half consisting of only 1 member. About two-thirds were employed. Ninety-five percent of D-SNAP households resided in an urban area. Nearly 40 percent of household heads did not report their race,<sup>16</sup> and over half identified as Black. The average D-SNAP benefit amount was \$339, with all households receiving a benefit over \$100. About a third had no net income after applying the D-SNAP deductions, while 16 percent had a net income above 130 percent of the Federal Poverty Guidelines.

<sup>15</sup> This number includes all unique D-SNAP households observed in September and October 2020. The number of households tracked in the administrative records may differ from other sources because of several factors, including limitations of the eligibility system, edits to the records, and differences in how the study team processed the data compared with the State data team.

<sup>16</sup> Tennessee's D-SNAP collected race and Hispanic ethnicity using one field.

**Figure 6.5. Characteristics of D-SNAP Households, 2020 Severe Storms, Tennessee**

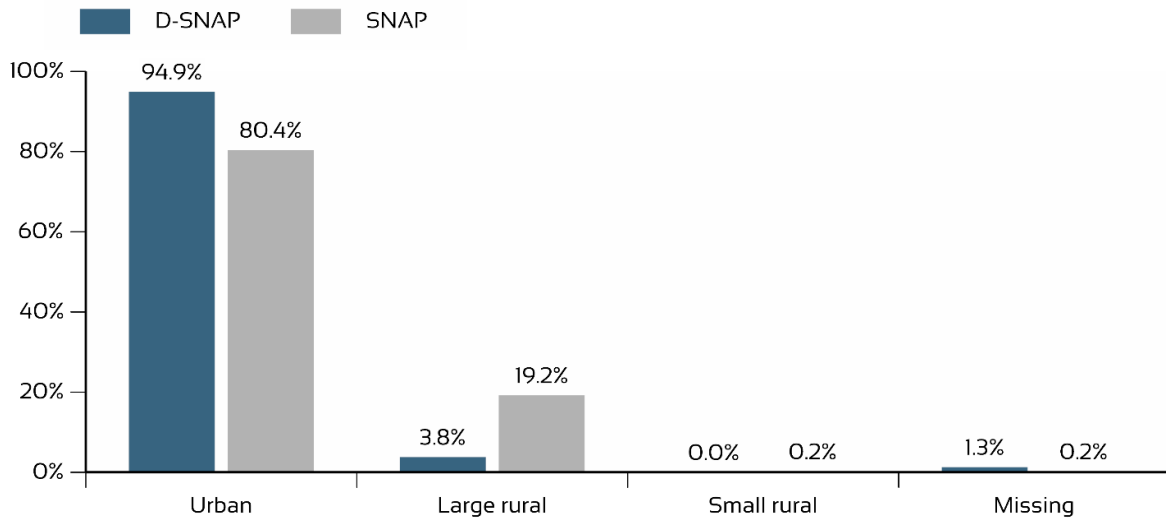


Note: Percentages may not add to 100 percent because of rounding.

## 2. D-SNAP Household Characteristics Compared With SNAP Households

During the D-SNAP application period, 42,746 SNAP households were located within the 3 D-SNAP counties, representing 10 percent of the total 423,311 SNAP households in Tennessee. SNAP households in the D-SNAP counties were mostly similar to D-SNAP households, with several differences. Despite living in the same counties, 95 percent of D-SNAP households resided in urban areas compared with only 80 percent of SNAP households (figure 6.6). Race data were available for 100 percent of SNAP households but missing for 39 percent of D-SNAP households. Based on reported data, only 6 percent of heads of D-SNAP households were White compared with 51 percent of SNAP participants in the same counties. About two-thirds of D-SNAP households reported having at least one employed member, while only 2 percent of SNAP households included an employed member (figure 6.7). As in the other States, the D-SNAP benefit amounts tended to be higher than the monthly SNAP benefit. The mean D-SNAP monthly household benefit was \$339 compared with \$262 for SNAP households. Appendix C table C.1.8 presents other characteristics of D-SNAP and SNAP households during March 2020.

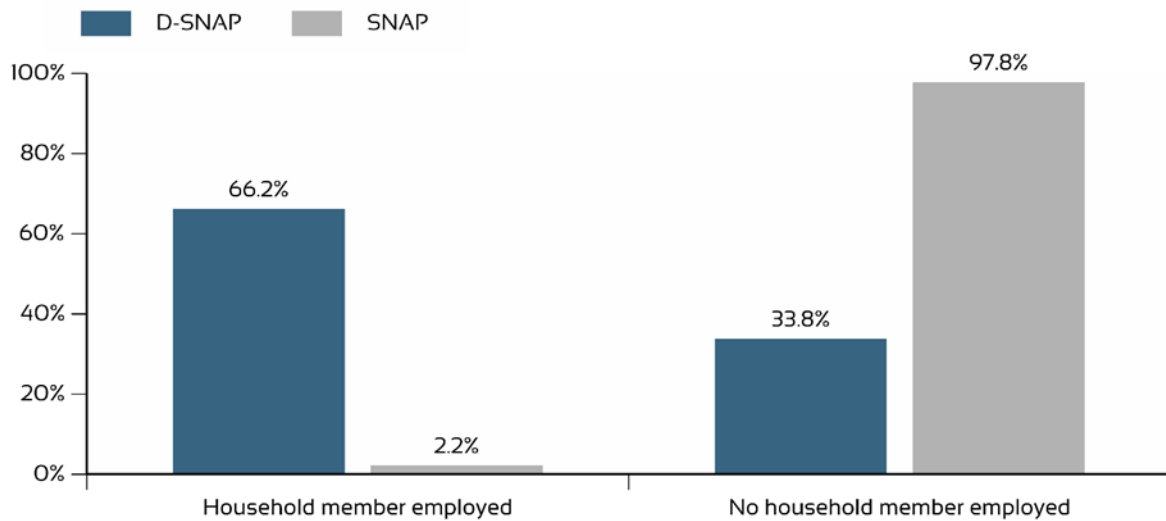
**Figure 6.6. Distribution of Urban and Rural Households Among D-SNAP and SNAP Households in D-SNAP Counties, 2020 Severe Storms, Tennessee**



Note: Urban and rural status was determined using the Rural-Urban Commuting Area (RUCA) codes (WWAMI Rural Health Research Center, n.d.). Missing data reflect households with missing address information or ZIP Codes that were not included in the RUCA codes.

Source: Tennessee administrative data

**Figure 6.7. Employment Status Among D-SNAP and SNAP Households in D-SNAP Counties, 2020 Severe Storms, Tennessee**



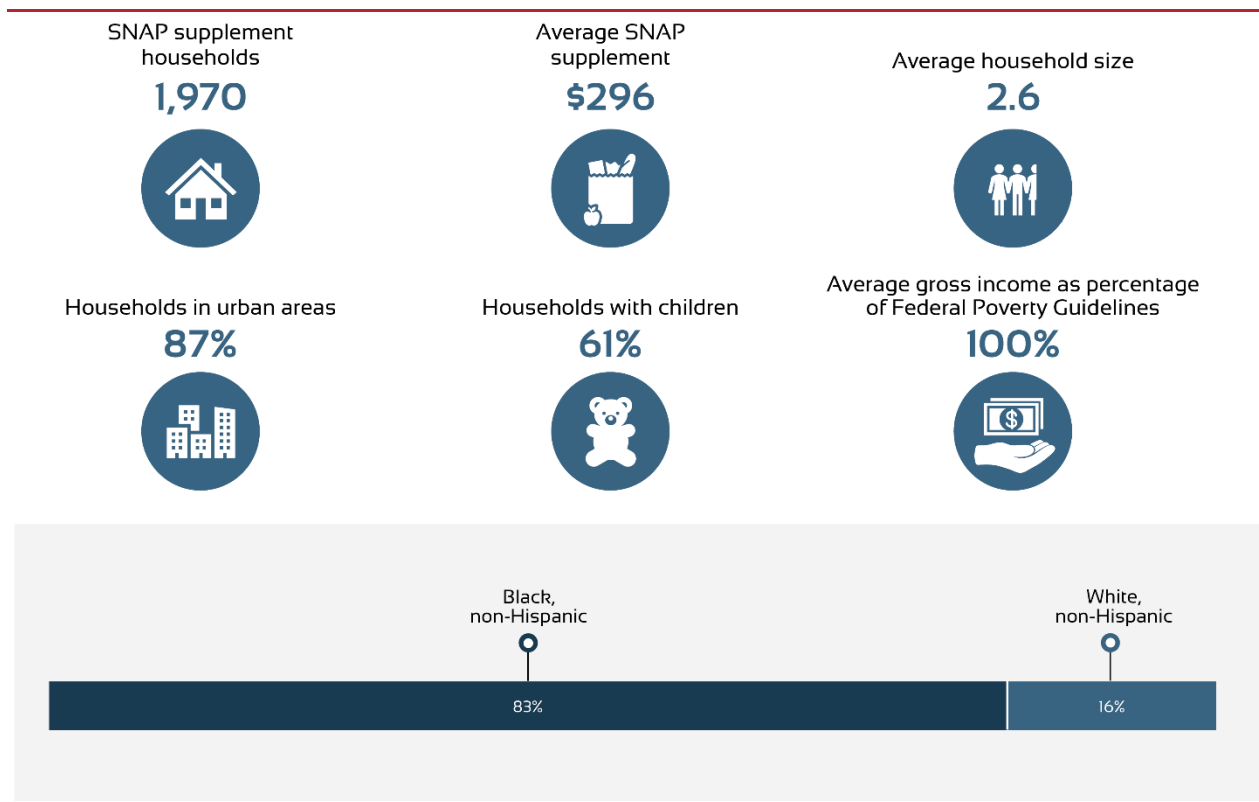
Source: Tennessee administrative data



### 3. Household Characteristics by SNAP Disaster Supplement Status

SNAP households affected by the March severe storms that were not already receiving the maximum allowable benefit were eligible for a one-time supplementary benefit. A total of 1,970 households, or 5 percent of the SNAP households in Tennessee in March 2020, received a SNAP supplement in relation to these storms (see figure 6.8). The average household supplement was \$296. Figure 6.8 describes the characteristics of households receiving a supplement. Households included an average of 2.6 individuals, with 61 percent including a child and about half including a person with a disability. Nearly all (99 percent) households were unemployed. Household heads were more than five times more likely to identify as Black (83 percent) than White (16 percent).

**Figure 6.8. Characteristics of SNAP Supplement Households, 2020 Severe Storms, Tennessee**

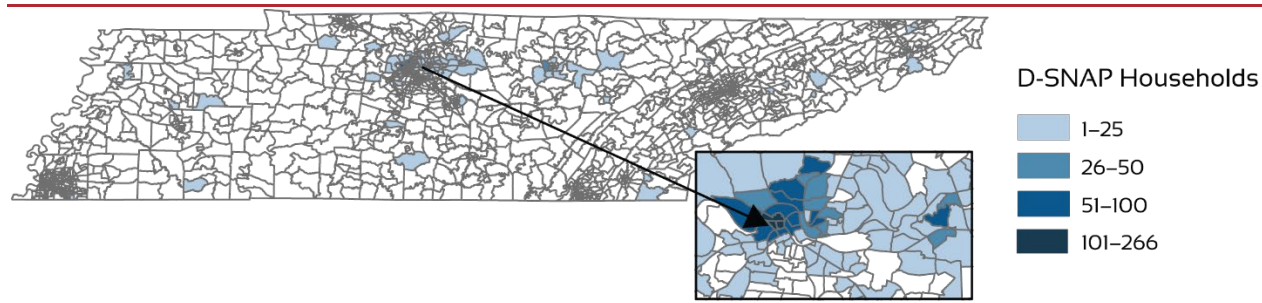


Note: Percentages may not add to 100 percent because of rounding.

### H. Geospatial Impact of D-SNAP

A spatial assessment of D-SNAP households indicated a wide distribution of D-SNAP beneficiaries throughout the State, even though the counties eligible for IA were clustered in the middle of the State. The distribution suggests some beneficiaries relocated outside D-SNAP counties after the disaster (see figure 6.9). The number of D-SNAP beneficiary households ranged from 0 to 266 within census tracts in Tennessee.

**Figure 6.9. Number of Households Enrolled in D-SNAP, by Census Tract, 2020 Severe Storms, Tennessee**



The study team also mapped the average distance of a household to the distribution site. In Tennessee the average distance to a distribution site was 6.5 miles (mean, median: 1.9 miles). The closest participants/beneficiaries lived 0.1 miles from a distribution site, while the farthest away was 234 miles, likely indicating a household that relocated after the disaster. About one-quarter (25.2 percent) of households lived within 1 mile of a distribution site. Of the eight distribution sites, half had fewer than five households within 1 mile. However, all of these sites had at least 25 households located within 5 miles.

## I. Data Limitations

The Tennessee D-SNAP system did not track data on all individuals in the D-SNAP household. The study team could not identify if households included a child, older adult, or participant with a disability. The study team also could not directly identify the number of individuals in the household; however, the D-SNAP benefit amount was used to determine the household size because it is automatically the maximum allowable benefit by household size. Tennessee also did not track gross income for D-SNAP households, although net income was recorded. The study team included net income as a percentage of the Federal Poverty Guidelines in appendix C tables C.1.8 and C.1.9, although net incomes for SNAP and D-SNAP are calculated differently. Because of these differences, the net income calculations are not directly comparable.

Tennessee's D-SNAP eligibility system did not include any unique identifier that could be linked to the SNAP eligibility system (e.g., SSN). The study team could not examine whether any individuals had transitioned from D-SNAP to SNAP in the 6 months following the D-SNAP operation.

## J. Conclusions

In March 2020, Tennessee operated a D-SNAP that transitioned from an in-person D-SNAP operation to a virtual D-SNAP operation. During this D-SNAP, as the global COVID-19 pandemic became an imminent threat, Tennessee amended its D-SNAP waiver to allow participants to complete and submit a preapplication online through the State's ServiceNow platform and complete their application and interview by phone. This change enabled Tennessee to help its affected residents while maintaining the health and safety of the public and staff. Since the 2020 severe storms, Tennessee has made efforts to incorporate plans and provisions for operating a virtual D-SNAP into its annual D-SNAP plan.

State and local DHS staff largely attributed the success of their D-SNAP transition to planning and partnerships. Staff and community stakeholders noted several areas of the D-SNAP that worked well:

- ▶ **Updates to the annual D-SNAP plan:** Staff focused on more general, high-level updates rather than more detailed prescriptive solutions in an all-hazards approach to its D-SNAP planning. The planning and preparedness efforts from staff included lessons learned from prior disasters. Staff noted the importance of annual FNS regional training as a forum to exchange best practices and lessons learned with other States in the region.
- ▶ **Early planning:** Tennessee began planning for a D-SNAP implementation as news of a storm that could affect the State was reported. Staff noted the importance of general knowledge of the steps to be taken: ensuring staff availability, identifying locations, determining resources, and delineating the division of labor and responsibilities. Staff's ability to understand the needs and actions to be taken was critical to avoid delays.
- ▶ **Close partnerships with stakeholders:** Staff noted the importance of communications with stakeholders, including the liaison with TEMA to coordinate disaster-related information, the Field Management Team to communicate with local stakeholders, and regional and local offices to staff site operations.

Only a few days after beginning in-person D-SNAP operations, Tennessee modified its D-SNAP waiver request to accommodate a fully virtual D-SNAP as a result of the social distancing guidelines associated with the COVID-19 pandemic. The transition to the virtual D-SNAP identified the following opportunities to improve future D-SNAP operations and increase the knowledge of the program:

- ▶ **Adjusted staffing needs:** Using an online portal such as ServiceNow requires fewer D-SNAP staff compared with the in-person process. Staff noted that ServiceNow reduced the need for additional followup and delays in issuance of benefits, contributing to the overall expediency of the D-SNAP application approval process.
- ▶ **Reduced burden:** Staff shared that the pivot to the ServiceNow platform enabled clients to register online and complete the application using their phones. Many clients were able to complete their application, interview, and eligibility determination process within about an hour. When the D-SNAP required paper applications, both State and local staff noted that gathering the necessary information and reports was challenging; using ServiceNow kept the D-SNAP from becoming an "unbearable burden."
- ▶ **Increased roles for contractors in the response:** During the March 2020 D-SNAP, constant communication between TDHS and Conduent helped State agency staff quickly implement a plan to deliver EBT cards to applicants. The EBT card issuance process dramatically shifted with virtual operations as Conduent began providing overnight delivery directly to clients.
- ▶ **Reduced access barriers:** Staff emphasized that a virtual D-SNAP helped minimize the stigma associated with public assistance, enabling individuals who had never depended on public assistance to seek help during the disaster.

## Chapter 7. Key Findings and Best Practices

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The study team drew on findings from interviews with FNS National and Regional Office staff, State agency staff, community partners, and other interested parties to identify key findings, best practices, and opportunities to improve the D-SNAP.

### A. Key Findings

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Interview respondents overwhelmingly expressed their desire to continue virtual D-SNAP operations after the end of the pandemic. Respondents noted that virtual D-SNAP—

- ▶ **Improves program access:** Individuals with disabilities, older people, those with limited transportation, and those who cannot take time off work may be better able to access D-SNAP benefits because they do not need to be present at a D-SNAP site. Preregistration systems also enable clients to begin the application process for benefits on their own time and outside business hours.
- ▶ **Reduces burden on frontline staff:** In-person D-SNAP operations require long and challenging workdays. Virtual D-SNAP operations could provide more flexibility for staff and enable States to distribute the workload across the State (e.g., staff outside the D-SNAP counties could help process applications).
- ▶ **Leads to cost savings:** Many costs, from renting port-a-potties to paying staff overtime, are associated with an in-person D-SNAP. If staff need to travel from other parts of the State to the D-SNAP application site, expenses also include lodging and meals. While a virtual D-SNAP has its own costs, they are significantly lower than an in-person operation. Respondents from Louisiana also noted that if staff do not need to travel to a D-SNAP site, they are no longer competing for hotel accommodations with the individuals who experienced the disaster.

Additional considerations to improve future D-SNAPs include:

- ▶ States need more guidance on needs assessments. None of the annual D-SNAP plans the study team reviewed contained a clear description of the process for conducting a needs assessment. Interview findings suggest SNAP State agency staff may not have received sufficient guidance from FNS about the needs assessment process. FNS should consider including a dedicated needs assessment section in the D-SNAP waiver request template that details the necessary data and how to acquire it. This guidance can help States complete the needs assessment more consistently.
- ▶ Several State agencies described formal processes for incorporating lessons learned from a disaster response into future versions of the annual D-SNAP plan. For example, Louisiana drafts After Action Reports that include recommendations intended to improve processes; actionable recommendations are then incorporated into the annual plan. FNS should consider developing standards for updating annual D-SNAP plans and incorporating this information into their D-SNAP training

- ▶ Most States highlighted the importance of new technology. Preregistration systems are a recent innovation in D-SNAP operations. These systems enable households interested in applying for D-SNAP to submit information on their circumstances before the application period and can be used for both in-person and virtual operations. Mobile payments (e.g., digital wallet) could help facilitate timely issuance of D-SNAP benefits to clients. Loading benefits through a smartphone app could also enable individuals who may have had to relocate as a result of the disaster to receive D-SNAP benefits.
- ▶ As natural disasters occur in more States that have little or no experience operating a D-SNAP, FNS could support a formal network for peer-to-peer learning that could help less experienced States get advice on implementation and operation.

## B. Best Practices and Opportunities to Improve Planning

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D-SNAP planning is composed of two aspects: (1) general disaster planning and response and (2) event-specific planning. Interviews with States identified several best practices and opportunities for improvement related to D-SNAP planning. A review of State annual D-SNAP plans highlighted further key considerations for developing these documents.

### 1. Best Practices

North Carolina and Tennessee shared it was helpful to **begin drafting the D-SNAP waiver request before the disaster strikes** to ensure it can be submitted to FNS as soon as FEMA issues an IA declaration and commercial food channels are restored. Both States also noted the importance of **consistent and early communication with the FNS Regional Office staff** to ensure a swift D-SNAP waiver approval process.

Three States—Louisiana, North Carolina, and Tennessee—noted the **importance of maintaining relationships and open lines of communication with community partners, contractors, or other State agencies (e.g., the emergency management agency)**. In Louisiana, State agency staff developed written agreements with vendors, and these agreements were instrumental in ensuring speedy D-SNAP operations. North Carolina county staff noted the importance of maintaining open lines of communication with county emergency management agencies through quarterly or biennial meetings to ensure readiness when disasters strike. Tennessee prioritized the importance of an ongoing relationship with its emergency management agency by creating a position for an onsite liaison.

Oregon described the benefits of consulting with a more experienced State prior to launching its D-SNAP operation. Before the 2020 wildfire D-SNAP profiled in this study, Oregon had not operated a D-SNAP in more than 10 years. The State agency staff noted their conversations with Louisiana provided tangible examples of how to organize and implement a D-SNAP operation, including elements such as data collection. States with limited D-SNAP experience should consider States with more experience as a potential resource. **As disasters become more prevalent, FNS may consider developing more comprehensive resources or opportunities to promote knowledge sharing across States and Regions.**

### 2. Opportunities to Improve

In Tennessee and Oregon, the public was not familiar with the D-SNAP program, and State agency staff experienced challenges related to disseminating information about D-SNAP timing and eligibility. A more comprehensive outreach campaign could be beneficial to help the public understand the differences between SNAP and D-SNAP.

A review of the study States' annual D-SNAP plans and interview findings revealed the following opportunities to improve annual D-SNAP plans:

- ▶ **Size and scope:** States that have seen a variety of disasters, such as North Carolina and Tennessee, noted the importance of having a general plan that can be used across disasters of various scope and size. Oregon's D-SNAP plan noted several possible types of disasters the State may experience, from tsunamis to wildfires. However, other States focus their planning efforts on the type of disaster that is characteristic of their region; for example, Louisiana's D-SNAP plan primarily focuses on hurricane response. States may need to decide which approach to follow based on their circumstances. States that have not experienced a large-scale disaster in recent years may want to consider a more general plan because they may not be able to accurately predict what type of disaster may strike.
- ▶ **Annual D-SNAP plan updates:** Tennessee staff shared the importance of refining the plan annually to ensure it is up to date. However, a review of the States' D-SNAP plans showed that States tend to make minimal alterations to their annual plans year to year. Most changes reflect lessons learned from a recent D-SNAP.
- ▶ **Use of available resources:** County staff in North Carolina noted that as they develop their county-level plans, they reviewed disaster plans from other counties in the State. These staff noted it was "unnecessary to reinvent the wheel" when other county's plans could serve as a blueprint. Similarly, states newer to D-SNAP, or those that wish to update their plans, may benefit from reviewing exemplary plans from other States.
- ▶ **Consulting with other agencies:** States varied in whom they involved in drafting the plans. When North Carolina first developed its D-SNAP plan, SNAP staff consulted with IT professionals to gain input and expertise on the sections of the plan related to the technology and information systems. Currently however, the State only makes small updates to its annual D-SNAP plan and input comes from State agency staff. Similarly, in Louisiana and Oregon, only SNAP State agency staff are involved in developing the plan. On the other hand, Tennessee regularly consults with its EBT provider, to make sure that any procedures necessary for distributing EBT cards are up to date.
- ▶ **Information on needs assessment in D-SNAP plans:** The annual D-SNAP plans reviewed as part of this study did not contain a clear description of the process for conducting a needs assessment. Findings suggest SNAP State agency staff may not understand the role or the importance of the needs assessment. FNS should consider requesting that States describe their needs assessment process, including the data they will use and their plans for acquiring these data, in their annual plans. FNS should consider revising the D-SNAP waiver request template so it includes a needs assessment section to help States complete this part of the request more consistently.

## C. Best Practices and Opportunities to Improve Implementation

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The implementation phase begins after FNS approves the D-SNAP waiver request. States prepare sites or virtual processes, select and train staff, coordinate with partner organizations, and conduct a public awareness campaign. The interviews highlighted several best practices and opportunities for improvement related to D-SNAP implementation.

## 1. Best Practices

Louisiana and Oregon created virtual teams of eligibility workers and staff in other supporting roles (e.g., policy SMEs). For example, both States had **policy staff supporting their virtual teams**. These staff facilitated eligibility workers' roles by responding to policy-related questions. Both States also used **group chats (e.g., Skype) so teammates could see questions and answers**.

North Carolina and Louisiana used hierarchical management structures to provide a clear chain of command. **Upper management in both States worked from a command room**, which enabled them to collaborate and make decisions efficiently. Louisiana noted this approach facilitates communication in fast-moving situations when several agencies that typically operate independently have to coordinate. The States also used **morning huddle meetings** to provide updates, answer questions, and maintain staff morale.

Three States—Louisiana, Oregon, and Tennessee—used **phone numbers or hotlines already known to the public as part of their D-SNAP public awareness campaign**. Louisiana and Oregon used 211, and Tennessee used a call line to its FASC.

## 2. Opportunities to Improve

All States conducted D-SNAP training before operating a D-SNAP, but differences among States in annual training protocols exposed additional opportunities for improvement. Two States—Oregon and North Carolina—did not conduct annual D-SNAP trainings, while the other two States—Louisiana and Tennessee—did. Although staff in Louisiana found the annual D-SNAP training redundant, staff in Oregon recommended **periodic D-SNAP trainings to keep staff aware of the program**; the use of annual trainings may be more beneficial in States that infrequently experience disasters.

Oregon highlighted the need for trauma-informed interview training, noting that staff voiced concern about retraumatizing D-SNAP clients when they had to ask applicants questions about being displaced by the wildfire. **Annual D-SNAP trainings could provide an important avenue for trauma-informed interview training** because it may not be able to devote the time necessary for such a nuanced topic during D-SNAP trainings that take place immediately prior to a D-SNAP operation.

Louisiana assembled 24 virtual teams of 40–45 staff but did not consider how team size or prior working relationships might affect team cohesion and productivity. Team leads were challenged to manage large teams of staff they were not familiar with. Following Hurricane Laura, Louisiana began forming teams around local offices and recommended future D-SNAPs **assemble virtual teams geographically to allow familiar teams to work together**.

Oregon faced challenges because the State had not operated a D-SNAP in over a decade. Both the public and staff were unfamiliar with the D-SNAP program. Lack of familiarity led to considerable confusion around timing and application requirements. In comparison, the public and staff in Louisiana were familiar with the D-SNAP program because the State experiences frequent disasters. The contrast between these States highlights an opportunity for **FNS to encourage States to proactively educate the public and SNAP staff about D-SNAP**.

## D. Best Practices and Opportunities to Improve Operations

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The D-SNAP operations phase consists of the process clients undergo to apply for D-SNAP benefits. This phase also includes State agency processes for issuing EBT benefits to approved clients in the 72-hour

timeframe and maintaining program integrity. Findings identified several best practices and areas for improvement for this phase of the D-SNAP. Respondents discussed the importance of continued access to virtual operations and novel ideas for distributing D-SNAP benefits.

## 1. Best Practices

North Carolina and Tennessee found **operating in-person D-SNAP from local offices (e.g., SNAP offices, county health department offices) worked well** because clients were familiar with the location and sites were already ADA-compliant and had internet and air conditioning. North Carolina also established a satellite site near the main office dedicated to serving individuals who required additional assistance.

Among the study States, only North Carolina operated a fully in-person D-SNAP. North Carolina county staff noted that a continuous client flow approach was one of their best practices. This flow included (1) keeping clients consistently moving from one station to the next rather than keeping them in one space and (2) informing clients of the next steps and approximate wait times. Although it occasionally took clients more than an hour to complete the D-SNAP application process, they felt they were making consistent progress.

Automating as much of the D-SNAP process as possible is also key for ensuring smooth operations. For many years, Louisiana has been using a **preregistration system** that allows residents to provide much of the information needed for a D-SNAP application before the disaster. Louisiana and North Carolina employed **prerecorded messages** (e.g., rights and responsibilities). Louisiana used these messages on the D-SNAP phone lines, saving time for eligibility workers and ensuring all clients received the same information. North Carolina played these messages for clients while they waited in line at the D-SNAP site.

Oregon and Tennessee set up online registration systems as part of their virtual operations. These systems enabled clients to apply for D-SNAP in their own time and limit the amount of information needed during the D-SNAP eligibility interview. This reduced errors and the length of time a client needed to be on the phone.

Ensuring program integrity is an important consideration while operating D-SNAP. **Redundancy in the D-SNAP process** helped eliminate fraud, mistakes, and misinformation in North Carolina. For example, having several staff in different positions review D-SNAP applications ensured suspected fraud was adequately communicated to integrity workers; this process also created more opportunities for quality assurance. Staff also shared program integrity information with clients at several points in the application process (e.g., in line, waiting for their EBT card) and in several formats (e.g., verbally, in writing).

Tennessee relied on eligibility workers' use of a case note system to identify potential fraud cases. To reduce the number of inconsistencies in case notes in Tennessee, SNAP State agency staff **developed a guide for eligibility workers to improve case notes and documentation**.

Louisiana **recorded all phone interviews** and reported that this process may have helped prevent fraudulent behavior: Some individuals hung up once they realized they were being recorded. Staff who work on **fraud could easily be added to the call** to help address potential fraud proactively. In all States, eligibility workers did not review employee D-SNAP cases. Instead, a **manager or lead worker was assigned to review employee cases**, ensuring privacy and program integrity.



## 2. Opportunities to Improve

The shift from in-person to virtual D-SNAP led to a parallel shift in the concerns around accessibility, from issues associated with physical access to issues associated with telephone and online access. Advocates were concerned about individuals with hearing impairments and persons with limited English proficiency. Louisiana’s virtual D-SNAP was able to accommodate these groups and suggested that States should **include information about accessibility and the types of accommodations available in all D-SNAP communications**.

One challenge associated with a virtual D-SNAP is ensuring clients receive their D-SNAP benefits on their EBT cards within 72 hours of application. Because disasters may affect mail and delivery services, **States need to carefully consider how to distribute EBT cards in the wake of a disaster**. Louisiana, for example, initially conducted distribution using Federal Express but quickly discovered that the main Federal Express distribution center, located in Lake Charles, had been affected and was operating at reduced capacity.

D-SNAP places a large burden on frontline staff. **Increased use of technology**, such as preregistration systems, can help reduce burden on staff. **Policy options such as automatic replacements or extended certification periods** can decrease foot and phone traffic during the D-SNAP operation and enable staff to focus on processing D-SNAP clients. States should consider requesting these waivers when applicable, and if necessary, FNS should provide technical assistance to States on these policy options.

## E. Best Practices and Opportunities to Improve Reporting and Closeout

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In general, States did not report many challenges or have many suggestions for best practices or program improvement related to daily reporting or closeout activities.

### 1. Best Practices

States reported minimal closeout activities for in-person and virtual D-SNAPs. Staff in Louisiana and Oregon participated in **meetings after the D-SNAP closed to discuss strengths and areas for improvement**.

### 2. Opportunities to Improve

All four States were able to provide daily reports to FNS. For the case review process, three States—Louisiana, Oregon, and North Carolina—noted the most common error found in the case review process was unreported or underreported income. Louisiana had over 2,000 cases to review and found reviewing this many cases challenging, especially in light of the back-to-back disasters the State experienced in 2020. To address this challenge, **Louisiana hired retired State workers to support the case review process**.

North Carolina recommended keeping a separate log of employee applications and matching applications to HR records. Louisiana had the highest volume of public cases to review and noted that **interview recordings made the case review process easier**.

## F. Study Limitations

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The findings reported in this study should be considered alongside the limitations that arise from the design of the study, the quality of the data, and the data collection challenges related to the COVID-19 pandemic.

### 1. Study Design

The study used a case study approach to assess States' actions in planning, implementing, operating, and reporting D-SNAPs associated with specific disasters. This report includes five disasters occurring in four States over a 3-year period (2018–2020). Examining a small number of events from a large pool of events may produce findings that are not generalizable.

### 2. Data Quality

The study used a combination of qualitative and quantitative data to describe D-SNAP planning, implementation, operation, and closeout. The study team's descriptions of these D-SNAPs and the findings and conclusions drawn from the case study report are subject to limitations of the data quality.

Qualitative data can be affected by participants' ability to recall and relay information. For example, during interviews with participants in Louisiana about the D-SNAP that followed Hurricane Laura in 2020, some mentioned that their recollections may have referred to the events and activities related to Hurricanes Delta or Zeta, which also affected Louisiana in 2020. In North Carolina, participants found it difficult to recall and report only on the 2018 D-SNAPs and tended to include information on D-SNAP planning and implementation that affected more recent D-SNAPs. Participants can also be biased by their role or position in the activity under study. A State agency director involved in the development of a training protocol would provide a more positive perspective on the protocol's value than a local office worker who participated in the training and had to rely on what they learned to carry out their job.

Comparability challenges emerged as the study team was working with data from States' SNAP and D-SNAP eligibility systems. Most of the case study States have separate eligibility systems for SNAP and D-SNAP. Each system has data fields and variable definitions suited to the specific needs of the program. Differences between the data provided from these two systems limited the study team's ability to compare SNAP and D-SNAP households. For example, some States used different variables to collect the same demographic characteristics (e.g., race and ethnicity). Three of the four States did not collect information on whether a household that received benefits through D-SNAP included individuals with a disability. In two States—Tennessee and Oregon—the D-SNAP eligibility system only included information for the head of household. For these States, the study team was not able to accurately determine whether households included children or older members. The study team had to rely on the D-SNAP benefit amount to estimate the household size, which could lead to errors.

The challenge of comparing SNAP and D-SNAP households was further complicated by the lack of a unique identifier linking households between the two systems. However, even the use of a common eligibility system did not completely solve this problem. In North Carolina, the only State that used a consistent eligibility system across the two programs, the study team found no D-SNAP households present in the SNAP caseload in the 6 months following the disaster. When the study team asked the State whether this finding was plausible, the State noted possible reasons D-SNAP participants did not enroll in SNAP (e.g., differences in eligibility requirements, geographic displacement because of the disaster). However, the available data were not sufficient to definitively conclude that no D-SNAP households had later enrolled in SNAP.

Other data quality issues that emerged included duplicate records for the same households in the same months, with different benefit amounts. These issues seemed to be related to the receipt of different benefit categories (e.g., SNAP, replacement, supplement benefits) at different times over the month. The study team also found States' eligibility systems did not track benefit issuance by specific disasters. Louisiana experienced three hurricanes from August through October 2020, resulting in three back-to-back D-SNAP operations. Data systems reflected that benefits were issued for D-SNAP but not for which D-SNAP. In Tennessee, the D-SNAP for the severe storms occurred concurrently with the beginning of the COVID-19 pandemic, resulting in several funding streams simultaneously issuing SNAP replacements and contributing to challenges interpreting these data.

### **3. Data Collection Challenges Related to the COVID-19 Pandemic**

Because of ongoing public health concerns related to the COVID-19 pandemic at the time of data collection (winter and spring 2022), site visits in States that did not conduct in-person D-SNAPs—and therefore did not have physical locations that required direct observation—were conducted virtually using remote meeting software. Although virtual site visits are becoming a common format for data collection, they may lack the depth and quality of in-person site visits.

Prior to the COVID-19 pandemic, all D-SNAPs were in-person operations. Of the five D-SNAPs studied for this report, two were in-person operations conducted prior to the COVID-19 pandemic, one started as an in-person operation and pivoted to a virtual operation midway, and two were primarily virtual. The need to address public health concerns required States to develop new strategies for implementing and operating virtual D-SNAPs. These new strategies introduced unexpected variations into the study that may limit comparisons from State to State.

The study team planned to compare SNAP households that received supplements and SNAP households that did not receive supplements. The Louisiana and Oregon D-SNAP operations occurred during the pandemic, when SNAP benefits were temporarily increased through the provision of supplements; therefore, all households received the maximum allowable benefit amounts. No disaster-related supplements were issued during this period, resulting in the inability to conduct the planned comparisons in these two States.

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