



Food and
Nutrition
Service

DATE: NOV 07 2018

SUBJECT: State Agency Responsibilities Relating to the Disaster Supplemental Nutrition Assistance Program (D-SNAP)

Park Office
Center

TO: All Regional Directors
Supplemental Nutrition Assistance Program (SNAP)

3101 Park
Center Drive
Alexandria
VA 22302

The Food and Nutrition Service (FNS) is issuing this memorandum in response to questions about State agency responsibilities relating to D-SNAP. The Robert T. Stafford Disaster Relief and Emergency Assistance Act provides the Secretary of Agriculture with the authority to operate a D-SNAP when affected areas have received a Presidential major disaster declaration and when commercial channels of food distribution are available. The Food and Nutrition Act of 2008 provides the Secretary of Agriculture with the authority to establish temporary emergency standards of eligibility for households who are survivors of a disaster that disrupts commercial channels of food distribution after those channels have been restored.

In July 2014, FNS issued Disaster SNAP Guidance: Policy Guidance, Lessons Learned, and Toolkits to Operate a Successful D-SNAP (D-SNAP Guidance). As stated in the D-SNAP Guidance, the primary responsibility for providing emergency food assistance rests with the State agency. State agencies must design their own D-SNAP plans and update them annually. After a disaster, if an affected area in the State has received a Presidential disaster declaration for individual assistance, the State must evaluate the need for a D-SNAP or another feeding program and, if desired, submit to FNS a detailed request to operate a D-SNAP. Once FNS has approved a D-SNAP, the State agency is responsible for effectively implementing the program, ensuring program integrity, complying with applicable Federal law, and submitting daily reports. After program operations close, the State must perform post-disaster reviews and report findings to FNS.

FNS supports States' efforts to provide D-SNAP benefits by providing 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 information provided in post-disaster reviews and assessments to improve D-SNAP policy, training, and technical assistance.

The D-SNAP Guidance includes detailed discussion of D-SNAP policy. As a reminder of major D-SNAP-related State agency responsibilities, enclosed with this memo is a chart that provides an overview of the D-SNAP Guidance.

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Please distribute this guidance to your State agencies and advise them to contact their respective FNS Regional Offices with any questions and for technical assistance. FNS Regional Offices should contact Sasha Gersten-Paal at Sasha.Gersten-Paal@fns.usda.gov with any questions concerning this memorandum.

Sincerely,

A handwritten signature in black ink that reads "Lizbeth Silberman". The signature is written in a cursive style with a long horizontal flourish at the end.

Lizbeth Silberman
Director
Program Development Division

Enclosure



**Disaster Supplemental Nutrition Assistance Program (D-SNAP) Guidance:
Overview of State Agency Responsibilities**

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The Food and Nutrition Service (FNS) must approve a State agency's request to operate a D-SNAP. State agencies are responsible for the activities in the following chart:

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D-SNAP Guidance Page #	State Agencies:
5	Design their own D-SNAP plans and update them annually.
5	Implement an approved D-SNAP, ensure program integrity, comply with applicable Federal law, and submit daily reports.
5, 10-11, 16-17	After a D-SNAP has ended, submit post-disaster reviews and report to FNS.
9, 33-43	Include detailed information about their policy choices in their D-SNAP request and must support their choices by submission of data and written justification.
9, 44-45	Submit written signed requests and receive FNS approval to change policy choices described in an approved D-SNAP. This includes requests to expand operations, extend the application period, or modify some other aspect of the D-SNAP.
18	Include Electronic Benefit Transfer (EBT) issuance procedures in their State D-SNAP plan.
20	Submit their current D-SNAP plans to Regional Offices by August 15 of each year.
20-23	Include in their State D-SNAP plan the required elements described in the Guidance under "Roles and Responsibilities", "Resource Readiness Plan", "Implementation Plan", and "Other State-Specific Considerations".
23	Provide introductory and regular ongoing training on disaster eligibility, application, and issuance procedures to relevant county/local and State staff.
31	Submit certain disaster-related waiver requests to Regional Offices for processing by FNS' Retailer Policy and Management Division; these most commonly include requests for automatic/mass replacements, hot foods, and timely reporting waivers.
52	Post duplicate participation, fair hearing, and fraud prevention notices at all application sites. The State agency must provide a written copy of the eligibility determination, as well as written notification of the option for an immediate onsite review for denied applications and of fair hearing rights to all applicants.

55-56	Screen for multiple types of duplicate participation.
56	Conduct an interview with all new D-SNAP applicants prior to certifying the household for benefits. All interviews must be conducted at the D-SNAP site, except under circumstances in which the State agency determines special alternative procedures are required to facilitate the interview for applicants otherwise unable to appear physically at the D-SNAP application site. Any special accommodations or alternative interview procedures should be included in the State D-SNAP plan and the disaster-specific D-SNAP request.
58	Verify identity for every applicant.
59	Refer clients without required verification or with inconsistent information to onsite investigators or highly experienced staff/supervisors for review.
60	Separate certification and issuance responsibilities in order to minimize the risk of employee fraud.
63	Provide for immediate, onsite supervisory review for denied applicants.
64-65	Develop a system for reconciling both EBT cards and D-SNAP benefits, must account for Personal Identification Number (PIN) security if PINs are assigned, and must reconcile the number of cards set-up with EBT accounts and the number of cards issued and then research and explain any discrepancies.
65-66	Submit daily reports to FNS, using the template provided by FNS.
66-68	Implement certain internal controls to prevent fraud, including special measures to prevent employee fraud.
71-74	After D-SNAP operations have ended, submit reports to FNS and must address reporting and reconciliation areas unique to EBT systems.
74-76	Conduct onsite supervisory reviews and fair hearings as required in the Guidance and follow their FNS-approved procedures for establishing claims.
76-82	Conduct a comprehensive review of general program performance and reviews of individual cases along with a problem analysis on the review findings, and incorporate these findings into a Post-Disaster Review Report submitted to FNS.