



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
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DATE: September 29, 2020

SUBJECT: Disaster Supplemental Nutrition Assistance Program (D-SNAP) –
California – 9 Counties – Approval – FY2020

TO: Jesus Mendoza
Regional Administrator
Western Regional Office

The Food and Nutrition Service (FNS) approves California’s request to operate D-SNAP in 9 counties in response to the impact of wildfires that began on August 14, 2020. On August 22, 2020, President Donald J. Trump issued a major disaster declaration and subsequent amendments designating the following counties as eligible for Federal Individual Assistance: Butte, Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo.

The State agency estimates that 15,094 new households may be eligible for up to \$4,769,500 in D-SNAP assistance. FNS recognizes that given the aftermath of this disaster along with the continued impact of COVID-19, households may be in need of temporary nutrition assistance.

In order to mitigate the potential exposure and spread of COVID-19, the State agency has proposed several novel procedures in addition to allowing on-site applications in order to serve impacted households, specifically:

- Before the application period starts, operating a basic telephonic pre-registration that will collect limited information from applicants who wish to apply over telephone. This is not integrated with the State agency’s eligibility systems.
- During the application period, conducting telephone interviews, primarily through a “call-out” model where staff will contact applicants. This process is highly unique as other States that have operated telephone interviews during COVID-19 have used a “call-in” model where applicants contact the State agency and are routed through a centralized call center, but is not an option available in California.

FNS appreciates the State agency’s efforts to provide impacted households with temporary access to food assistance, and given the constraints of COVID-19, approves these novel procedures proposed for this specific request.

However, FNS has concerns whether these novel procedures may pose risks to the D-SNAP application process, customer service, and timely issuance of benefits. Given these concerns, FNS is approving this request with specific additional data requirements detailed below. FNS further notes that, absent the presence of COVID-19 or a similar pandemic, these novel procedures may not be approvable for future D-SNAP operations in this State or elsewhere.

Conditions of Approval

FNS approves the State agency's request and proposed alternative procedures detailed below, subject to the following conditions:

- Regarding the requested novel procedures, the State agency will:
 - Comply with additional evaluation and reporting measures outlined in the reporting section of this approval in order to determine the feasibility of these models for future D-SNAP operations.
 - Notify FNS if the State changes these approved processes in any way or encounters any issues with the approved processes.
- The State agency will have sufficient staff to process applications and conduct telephone interviews in a timely manner, with the ability to augment staffing as needed.
- The State agency will make reasonable accommodations for the elderly and disabled.
- The State agency will take reasonable measures to encourage social distancing and mitigate the spread of COVID-19.
- Commercial channels of food distribution have been restored in the requested counties, and there are a sufficient number of authorized retailers open and available to redeem D-SNAP benefits.

FNS reserves the right to direct the State agency to modify any of the novel processes in the event any issues emerge that pose a significant risk to operations, access, including reasonable accommodations for the elderly and disabled, or integrity.

Disaster Areas

This approval is limited to the following 9 counties: Butte, Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo County.

If the State agency wishes to expand D-SNAP to other counties that subsequently receive a Presidential Disaster Declaration for Individual Assistance, it must submit a request to FNS for approval.

Application Procedures

Application Period

For Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo County, the application period will begin no earlier than Wednesday, October 14 through Friday, October 16, 2020, then resume on Monday, October 19 through Thursday, October 22, 2020.

For Butte County, the application period will begin no earlier than Wednesday, October 21, through Friday, October 23, 2020, then resume on Monday, October 26 through Thursday, October 29, 2020.

The State agency will notify FNS of any changes to this schedule. If more than 7 days are needed to serve applicants in any of the approved counties, the State agency may request an extension of either application period, with appropriate justification, subject to FNS review and approval.

Application Processing Timeliness

The State agency will consider the day an applicant completes their interview with eligibility staff as the filing date of the application. FNS notes this is the same standard used in traditional on-site D-SNAP operations, as well as recent D-SNAP operations approved by FNS in other States with virtual application procedures.

Telephonic Pre-registration

Before each application periods begins, the State agency will allow applicants to complete a basic pre-registration for D-SNAP using an automated, phone-based tool. By using this tool, the applicant will provide basic contact information in order to request that State agency staff call the applicant to apply and complete an interview during the application period. As described below, the State agency will call applicants who complete a telephonic pre-registration in the order received in order to complete their interviews. Telephonic pre-registration is not required in order to complete an application. Applicants will be able to contact their County office at any point during their respective application period to complete their application and interview.

For Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo County, the State agency will accept telephonic pre-registrations from Wednesday, October 7 through Tuesday, October 13, 2020.

For Butte County, the State agency will accept telephonic pre-registrations from Wednesday, October 14 through Tuesday, October 20, 2020.

Online Pre-Registration

During the respective application periods, the State agency will allow applicants to submit a comprehensive online D-SNAP pre-registration through a State portal that will route the online pre-registration to the appropriate approved County and is connected to the State agency's eligibility systems. This online pre-registration will contain the same information and questions as a paper application. As described below, the State agency will call applicants who complete an online pre-registration in the order received in order to complete their interviews. Applicants will be able to contact their County office at any point during their respective application period to complete their application and interview.

Telephone Interviews

During the respective application periods, each County will contact all applicants via telephone to either assist in completing their applications and interviews, or schedule their interviews for another date during the application period. Using a "call-out" model, each approved County will make three attempts to contact each applicant in order to complete the application or interview. If the State agency cannot reach an applicant within three attempts, the applicant can contact their County of residence at the time of disaster during its respective hours of operation to complete their interview.

Other Application Procedures

During the respective application periods, each County will accept on-site applications and verification documents at the sites listed and during the hours of operation detailed in its request. FNS notes that the hours of operation may vary between each approved County.

If necessary, the State agency may document in the case file that a client verbally attested to the information provided on the application. The State must document the client's name, date and time of application, a summary of the information to which the client verbally assents, and the client's response indicating agreement or disagreement.

Benefit Period

For Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo County, the State agency will determine eligibility based on a household's income, resources, disaster expenses, and other circumstances from August 14, 2020, through September 12, 2020.

For Butte County, the State agency will determine eligibility based on a household's income, resources, disaster expenses, and other circumstances from September 7, 2020 through October 6, 2020.

The State agency will certify eligible households for 1 month and issue the maximum allotment based on household size according to FNS' Fiscal Year (FY) 2020 Disaster Gross Income Limits (DGIL).

Other Eligibility Criteria

- Only households that resided or worked in the approved counties at the beginning of the respective benefit periods are eligible to apply.
- Household composition as it existed at the beginning of the respective benefit periods will be used in determining eligibility and benefits.
- Households that experienced food loss alone as their only disaster expense are eligible to apply.
- If a household has received or expects to receive reimbursement for disaster expenses during their respective benefit period, only the net amount of expenses paid or anticipated to be paid shall be deducted.

Ongoing Households

As the State agency is already issuing emergency allotments (EA) under the Families First Coronavirus Response Act of 2020, ongoing SNAP households have already received the maximum allotment for their household size for the month of August and September. The State will continue to issue replacement benefits if a household submits an affidavit in a timely manner.

Electronic Benefits Transfer (EBT) & Issuance

The State agency will process applications and issue benefits to eligible households who apply for D-SNAP within 3 days (72 hours), consistent with FNS' D-SNAP Guidance. However, the State agency may take up to 7 days to process D-SNAP applications when information presented is questionable.

The State agency affirms that it has a sufficient supply of EBT cards to issue to all anticipated D-SNAP applicants, and will carefully monitor the supply of card stock and the number of applications received and processed each day in order to arrange for the production and delivery of additional cards should the State's estimate of applicant households prove to be too low. The State agency will notify FNS immediately should difficulties arise with card stock volume or production.

Program Integrity and Quality Control

The State agency will adhere to the verification requirements in FNS' D-SNAP Guidance to the maximum extent possible. These requirements include:

- Mandatory verification of identity.
- Where possible, verification of residency and loss of income or inaccessibility of resources due to the storm.
- If questionable, verification of household composition and food loss used as a disaster expense.

The State agency will allow applicants to securely provide documents verifying identity and other circumstances through both the telephonic and online pre-registration systems, and will encourage applicants to do so ahead of their interview.

In addition, if verification is not readily available due to the circumstances caused by the disaster, the State agency will assist applicants obtain verification in other ways such as securely accessing utility accounts, referencing other statewide eligibility systems for other assistance programs, or assist in securing temporary identification.

The State agency will conduct a duplicate participation check for all household members in both the State eligibility system and vendor issuance system before authorizing benefits.

The State agency may delay issuing benefits in order to verify questionable application information or if it suspects fraud, but for no more than 7 days from the date of application.

The State agency must conduct anti-fraud efforts and warn households of the consequences of committing fraud through notices and prominent signage at all application sites.

The State agency will review 100 percent of all applications from permanent, temporary, and contract State agency employees who are involved with administration and operation of the D-SNAP and include the results in its Post-Disaster Report, as detailed below.

Quality Control will exclude D-SNAP cases from its samples. However, as detailed below, the State agency will review a number of both approved and denied cases as part of their Post-Disaster Report.

Reporting

Before the start of the application period, the State agency will provide the total number of telephonic pre-registrations received in each approved county.

During the application period, the State agency will provide daily reports, as well as a summary report after operations end, with the following information for each approved county:

- The number of online registrations received.
- The number of paper applications received.
- The number of households and persons approved for D-SNAP.
- The amount of disaster benefits issued to approved households.
- The number of households denied based on their eligibility.
- The average issuance amount per household.

During the application period, the State agency will provide FNS with a daily narrative describing the status of, and any updates to, its telephone interview operations.

No later than 45 days after the close of D-SNAP operations, the State agency will submit an FNS-292B report in the Food Program Reporting System (FPRS).

No later than 6 months after the close of operations, the State agency will provide a comprehensive Post-Disaster Report to the FNS Western Regional Office which will include problem analysis and proposed improvements to the State agency's D-SNAP plan. Due to the unique nature of this request, the State agency will also review a statistically significant percentage of households certified through telephone interviews as part of its Post-Disaster Report. FNS will specify this amount for the State agency after operations ends.

Authority

FNS approves this D-SNAP under the authority of section 412 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act and section 5(h) of the Food and Nutrition Act of 2008.

Sincerely,

Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program