

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for Human Services

September 30, 2021

Dear County Directors of Social Services

Attention: Food and Nutrition Services Managers and Supervisors

Subject: Tropical Storm Fred Disaster Food and Nutrition Services

Priority: Information & Action required

I. GENERAL INFORMATION

On August 16, 2021, Tropical Storm Fred impacted several areas of the state causing severe flooding in the western part of the state that left an estimated 25,000 households without power. The United States Department of Agriculture (USDA) has approved a Disaster Food and Nutrition Services (DSNAP) Program for the following three (3) North Carolina counties: **Buncombe, Haywood, Transylvania.**

II. POLICY PROCEDURES

Individuals and families may be eligible for Disaster SNAP benefits if they lived in one of the above counties and were impacted by Tropical Storm Fred and meet the eligibility criteria. Individuals may apply in any of the three disaster counties. Households not affected by the Tropical Storm are not eligible for DSNAP benefits. This letter provides instructions and procedures counties must follow while implementing and participating in DSNAP.

III. IMPLEMENTATION INSTRUCTIONS

Counties must:

- Take applications for a 4-day period.
- Begin taking DSNAP applications on Monday, October 4, 2021 through Thursday, October 7, 2021. Friday October 1, 2021 will be reserved to allow counties to complete interviews, keying, and distribution of EBT cards.

Hours of operation will be:

Buncombe County

- Monday, October 4, 2021 & Tuesday, October 5, 2021 7:30 am to 6:00 pm.
- Wednesday, October 6, 2021 & Thursday, October 7, 2021 7:30 am to 5:00 pm.

Haywood County

 Monday, October 4, 2021 through Thursday, October 7, 2021 – 7:30 am to 7:00 pm.

Transylvania County

- Monday, October 4, 2021 through Thursday, October 7, 2021 8:30 am to 6:00 pm.
- Designate a separate area for the disaster applicants as the implementation of DSNAP must not negatively impact the operation of the regular FNS program during normal business hours. Households must still be able to apply for regular FNS benefits if they choose to apply.
- Designate a separate area for those who need to apply for replacement benefits.
 Households may request replacement benefits using the affidavit process through September 27, 2021.
- Provide designated areas and lines and accommodations for the elderly and persons with disabilities.
- Provide basic human comforts such as adequate restroom facilities and water.
- Counties may utilize temporary, non-merit-based staff for the administration of the DSNAP Program to include retired eligibility staff, staff from other county or state departments, as well as contracted staff that are adequately trained and supervised by county merit-based staff. Staff from other social services agencies can take or enter applications.
- Contracted staff may perform all functions including, crowd control, screening of applications, interpretation services, and EBT card distribution. Only those individuals who have prior NC FAST training and experience are allowed to enter applications and process in NC FAST.
- The Social Services Director must designate management/supervisors to interview and determine eligibility for staff involved with the administration of the DSNAP applying for DSNAP. Applicants must be informed that 100% of these cases will be reviewed post disaster.

DSNAP Application requirements:

- Only allowable application for disaster benefits is the DSS-1432 (Rev.9-2021), Application for Disaster SNAP.
- DSNAP rules only apply to disaster applications taken during the 4-day time period.
- Ensure all prescreens and applications are tracked daily.
- Process and enter in NC FAST all approved and withdrawn applications within <u>three</u> <u>days</u> from the date of application.
- Process and enter all denied applications as soon as possible but no later than <u>one</u> day, this will assist in identifying households that are denied and return to complete another application.

All employees who are assisting with the application taking process must review the following instructions carefully before the application process begins.

DSNAP Online PDF Submissions:

 Potential applicants will be able to complete a PDF version of the DSNAP prescreen form and submit to a secure county email listed below:

Buncombe: dssmail@buncombecounty.org
Haywood: dss.mail@haywoodcountync.gov
Transylvania: dssmail@buncombecounty.org
Haywood: dss.mail@haywoodcountync.gov
Transylvania: dssmail@buncombecounty.org

- Applicants can also submit the DSNAP prescreen form via fax, telephone, drop-box or in person.
- The PDF version will be available during the application period from 8:00 am October 4, 2021 through 5:00 pm October 7, 2021.
- PDF application will allow the potential applicant to submit information on all household members, answer questions about income and expenses, and submit verification of identity.
- The information submitted on the PDF prescreen form is NOT an application. It is
 considered a DSNAP prescreen tool and is not considered an application until contact
 is made with the applicant to complete the application process. Contact can be either
 telephone or in person.
- The potential applicant will receive the following message in both English and Spanish upon submission of the prescreen tool.
 - This is not an application until your interview is completed. If you have not been contacted by your local County Department of Social Services within 24 hours, please call the county in which you applied at the number listed below:

Buncombe County: 828-250-5500

Haywood County: 828-564-4328 Transylvania County: 828-884-1674

- The local DSS must monitor the DSNAP prescreen tool email account multiple times throughout the day.
- Upon receipt of the DSNAP prescreen tool the county should attempt to contact the household to complete the interview process. The county must make three (3) attempts to contact the household. Document each attempt in NC FAST.
- If unable to reach the household after three (3) attempts, take no further action unless the household contacts the local DSS.
- All prescreen forms must be submitted by 5 p.m. on Thursday, Oct. 7. Any prescreener form or application submitted by email, fax or drop box and received after 5 p.m. on Thursday, Oct. 7 will not be a valid submission and cannot be processed for DSNAP benefits.
- Potential applicants that submitted a DSNAP prescreen form and do not call the local DSS by 5:00 pm on October 7, 2021 lose their right to apply for disaster SNAP.
 Potential applicants that contact the local DSS after the DSNAP application period cannot apply for DSNAP.
- To promote social distancing and reduce the number of individuals and amount of time at the application site, it is suggested that counties complete as many applications as possible by telephone. The applicant has the option to contact the county for a telephone interview and telephonic signature once the prescreen form is submitted.
- Telephonic Signature grants additional flexibility than permitted under the state option in allowing States to document in writing in the case file that a client verbally attested to the information provided on the application, to include worker signature, date and time of interview, instead of audio recording of the verbal attestation to constitute a valid telephonic signature.
- Approved disaster applicants must come to a designated site to collect their EBT card.
 Households may send an authorized representative to pick up the EBT card. The
 household needs to provide a note stating they give permission to the authorized
 representative to pick up the EBT card. The note along with the household and
 authorized representative's identification is all that is necessary.
- The county will mail the EBT card overnight delivery to any household that has not picked up their card by the close of the next business day after approval. Example: Household is approved on Tuesday. The card is not picked up by the close of business Wednesday. The county must mail the EBT card overnight delivery.

I. POLICY INSTRUCTIONS

A. General Procedures

 Dual participation is not allowed. An individual can only be included on one application. Each individual household member must be searched thoroughly in NC FAST to determine if the individual has an existing individual ID number and if the household has an existing FNS PDC or already approved DSNAP.

Note: Ineligible or disqualified household members of FNS cases that were active at the time of the disaster, including individuals that were active in another state, are eligible for separate disaster benefits as these individuals will not be included in the regular August FNS benefits.

- 2. If an individual is discovered to be included on more than one application or is included in an active FNS household take the following actions:
 - a. If an individual is a household member in an active FNS case in the month of the disaster, they will show as ineligible on the DSNAP application. This will exclude the ineligible and disqualified member who are eligible to apply for separate disaster benefits.
 - b. If an individual has already been approved on a DSNAP application, they will show as ineligible on the second DSNAP case as having concurrent benefits.
 - c. If an individual is discovered on more than one application prior to approval of either application, resolve the discrepancy before approving either application.
- 3. If a household is temporarily residing in a county that is not operating a Disaster FNS Program, take the following action:
 - a. Households should be encouraged to apply in the disaster county that they
 consider their permanent residence <u>and</u> resided in prior to the disaster.
 However, they may apply in any of the counties running a disaster program.

Note: Displaced applicants can only apply in counties approved to administer DSNAP.

b. If the household has no intent to return to the disaster county and considers the non-disaster county their permanent residence, they can apply for regular FNS benefits or apply for DSNAP in a county location that has been designated to take DSNAP applications.

4. Verifications:

- a. Verification of identity is mandatory for the head of household and authorized representative. This can be in the form of a picture ID or any other form of identification. This proof may include, but is not limited to, Social Security card, mail, or collateral statement. Identity is the only eligibility factor that must be verified.
- Accept client's statement for the following: total net (take home) income, disaster related expenses, resources, and Social Security Numbers, if available.
- c. Verification of residency and loss of income or inaccessibility of resources should be verified "when possible".
- d. Verification of household composition should only be attempted if questionable.
- e. Use county available resources for verification.
- f. If verification is not available, do not pend the application, accept client's statement.
- 5. Pend applications only when the household is required to:
 - Provide verification of identity.
 - Applicant is unable to provide a statement of information necessary to complete the application.
 - Applicant's statement is questionable.
 - Written request from the head of household is needed for an authorized representative to make on application on their behalf.
 - Authorized representative's identity (It is not necessary to complete the Authorization Form (DSS-1688) that is used in the regular FNS program).

If needed use the DSS-8650, FNS Notice of Information Needed, to request verification, **allow five calendar** days for the client to provide verification. Process the application as soon as possible, but no later than **two calendar** days of receipt of the verification. Deny the application on the sixth (6th) day if information is not provided. The application cannot be reopened.

- a. Other verifications should be verified when possible.
- b. OVS matches are not required.

B. Eligibility Criteria

- 1. The household must have lived in the disaster area for the counties operating a DSNAP Program at the time of the disaster; **and**
- 2. Must plan on purchasing food during the disaster period; and

- 3. Must have experienced a food loss due to the disaster and at least one of the following adverse effects:
 - a. Damage to or destruction of the household's home or self-employment; or
 - b. Lost or inaccessible income, including reduction or termination of income, or a delay in receipt of income for residents of the impacted counties; **or**
 - A disaster related expense that was paid during the benefit period, which was not reimbursed during the period of August 16, 2021 through September 15, 2021; or
 - d. Inaccessible liquid resources.
- 4. The total net (take-home) income received during the benefit period August 16, 2021 through September 15, 2021, plus accessible liquid resources, minus eligible disaster-related expenses shall not exceed the disaster gross income limit.

The above factors will be used to determine eligibility. **All other FNS eligibility factors are waived and must not be addressed.** This includes but not limited to eligibility requirements for citizenship/alien, students, **ABAWD**, substance abuse, required household members, disqualifications, and Intentional Program Violations (IPV).

C. Completing the DSNAP Application

- 1. Use the DSS-1432 Rev. (09/21) to determine eligibility.
 - Provide application to applicants while they wait and encourage them to complete before they are interviewed.
 - Interviewer must review the application with the applicant to ensure all required information is included.
 - Only the interviewer or other designated staff must complete the shaded portions of the application form.
- Complete all information on the front page of the application including county name, application date and case/PDC number, Name of Head of household, permanent address, phone number and authorized representative information. Enter the disaster authorization period beginning date August 16, 2021 through September 15, 2021.
- 3. Part A, Household Situation, provides information to assist the agency in determining eligibility. Question 1 asks if the head of household is currently receiving FNS benefits.
 - a. If **no**, proceed with the application.

b. If **yes**, and the household lived in the disaster area and is receiving FNS benefits, the household is not eligible for Disaster SNAP benefits. Deny the application. The extended replacement request period expired September 27, 2021. Request for August replacements submitted after September 27, 2021 must be denied.

The questions regarding if the applicant or any household member is a county or DHHS state employee involved in the administration of DSNAP is critical for the post disaster review process. This includes temporary staff or other county agency staff utilized to take and process DSNAP applications.

4. Part B, Household Members, include information for members of the FNS household. The applicant must include all household members who lived together and purchased, prepared, and ate together prior to the disaster, this includes household members who may be temporarily living apart. If the applicant's household is temporarily staying with another household because of the disaster, do not include the other household members on the application.

To avoid duplication the application should include the following information:

- a. Name Complete "proper" name of each household member.
- b. Social Security Number Applicant should provide a SSN for every household member, if available.
- c. Birth Date Applicant should provide birth dates for all household members.
- d. Race Complete for each household member.
- e. Sex Complete for each household member.
- 5. Part C, Income includes information regarding sources, types, and total net (take-home) amount of income received during the period August 16, 2021 through September 15, 2021, by each household member. <u>Use actual income, do not round, or convert</u>.

Note: FEMA payments are excluded as income as they are considered a reimbursement. Do not allow expenses covered by the excluded FEMA payment.

Remember to deduct business-related expenses from selfemployment income. It is very important to stress that the application must include all sources of income as well as total net income amounts. Part D, Resources - only accessible liquid assets such as checking and savings
accounts and cash available during the benefit period will be counted as
resources. Exclude any resource that was counted as income during this
period.

Example: The client states they have \$500 in the bank. \$300 of it was counted as income because they just got paid. Exclude the \$300 from resources and count \$200.

7. Part E, Expenses - include disaster-related expenses. The household should provide accurate amounts for all disaster-related expenses.

For disaster-related expenses, include expenses that the household paid between August 16, 2021 through September 15, 2021. Do not include expenses that were paid or reimbursed by someone outside the household during the disaster period, such as costs covered or reimbursed by insurance or landlords. Incurred regular expenses are not allowable.

EXAMPLE: A household claims a \$50,000 loss because their home was destroyed. The household incurred the expense, and it is very doubtful that the household paid for a new home by September 15, 2021. It is only acceptable to allow a deductible amount as an expense if the expense was paid by September 15, 2021.

The household should provide most accurate amounts for the following disaster-related expenses:

- a. Food destroyed in the disaster List total dollar amount of food lost or destroyed in the disaster that the household has replaced or will replace.
- b. Dependent care and related mileage due to disaster List amount paid or amount that will be paid by the household. This does not include regular dependent care expenses. The cost must be as a result of the disaster.
- Funeral/medical expenses due to disaster List actual expenses that are a result of the disaster and the amount paid or that will be paid by the household.
- d. Moving and storage costs List amount paid or amount that will be paid by the household.
- e. Temporary shelter costs List amount paid or amount that will be paid by the household. This can include lodging costs.
- f. Cost to protect property during disaster List amount paid or amount that will be paid by the household. This can include, but is not limited to plywood, tape, batteries, and generators.

- g. Cost to repair or replace items for home or self-employment property List amount paid or amount that will be paid by the household.
- Other disaster-related expenses The household must identify and describe other disaster-related expenses paid or amount that will be paid by the household.
- i. Total expenses add the total expenses.
- 8. Part F, Eligibility Computation
 - a. Add the total income for the household from Part C and enter in #1.
 - b. Add the total accessible resources for the household from Part D and enter in #2.
 - c. Add #1 and #2 and enter total in #3.
 - d. Add the total expenses from Part E and enter in #4.
 - e. Subtract #4 from #3 and enter total in #5.
 - f. Enter the Maximum Gross Income Limit from the Disaster Table.

Household Size	Disaster Gross Income Limit	Maximum Allotment
1	\$1,817	\$234
2	\$2,190	\$430
3	\$2,563	\$616
4	\$2,951	\$782
5	\$3,355	\$929
6	\$3,759	\$969
7	\$4,133	\$1,114
8	\$4,506	\$1,232
Each Additional Member	+\$374	+\$176

- h. If the amount in #5 is equal to or less than #6 indicate the household is eligible by checking the appropriate block.
- i. If the amount in #5 is greater than #6 indicate the household is ineligible by checking the appropriate block.
- 9. Part G, **Penalty Warning** includes penalty warnings that must be explained to the applicant. Review these warnings carefully with every applicant, preferably prior to completing the application process. The applicant's signature on the

application is also certification that they understand the penalty warning information.

Note: Penalty Warnings and Fraud posters must be clearly displayed at the entrances and various locations throughout the application sites.

- 10. Part H, Certification and Signature includes a statement of understanding that the applicant must read before signing the application.
 - a. If the applicant signed the application prior to the interview, review the statement during the interview. The application must be signed and dated to be valid.
 - b. The interviewer and the processor must print his or her name and sign the application. The processor must also date the approval/denial and complete the certification period information, if applicable. The processor must also complete the denial reason section when applicable.
 - c. The individual entering the application into NC FAST must sign and date the application. If the application is entered in a county other than the household's county of residence, the interviewer must include his name, county, and phone number.

11. EBT Card Issuance

Those applicants that are screened as eligible for DSNAP will give their application to a designated EBT card worker. When distributing the disaster EBT card, it is vital that the sticker on the card is removed and placed on the application, and that the card is given to the applicant. The sticker on the EBT card contains the SUI and PAN numbers and must be attached to the correct applicants' application when the EBT card is issued. This will assist staff with entering the SUI and PAN numbers in NC FAST correctly.

_	SUI#	PAN#
Example:	800 <u>0339756</u>	508161006881 <u>0453</u>

The PIN for the EBT card is the last four digits of the card. Applicants must be notified of how to change their PIN if they choose to do so. Advise applicants to select a PIN that is unique and not easily determined such as 1234 or using the same four numbers. Replacement, balance inquiries, and merchant disputes for DSNAP cards are handled through the EBT Call Center, 1-888-622-7328.

Note: SUI and PAN numbers keyed on incorrect cases must be resolved by the county. The county must retrieve the cards from the households involved and facilitate a switch.

12. EBT Card Delivery and Security

- Disaster EBT cards will be delivered from the state office to the person assigned by the local county to maintain and issue the cards at the DSNAP sites.
- All cards will be in sealed cartons with the EBT Card Manifest attached.
- Upon delivery, designated county staff will confirm receipt of the cards by signing the Food and Nutrition Services Disaster EBT Card Delivery and Receipt (DSS-8601). A copy will be kept at the local agency and the original form will be returned to the state office.
- During the DSNAP process, two staff members will always be present during the issuance of EBT cards.
- The client will sign the card manifest and verify that the correct card was received.
- Clients will be notified how to change their PIN if they chose to do so.
- At the end of each day, the remaining disaster EBT cards will be kept in a locked and secure location.
- Counties are required to conduct daily inventory of EBT cards. The local agency will provide an EBT card count daily to the state office. This will help determine if additional EBT cards are needed.

II. ACTIVE FNS RECIPIENTS

A. Manual Supplemental Benefits Requested

USDA <u>did not</u> approve automated supplements for <u>Buncombe, Haywood, or</u> <u>Transylvania counties</u> as requested. Households that experienced a disaster loss must make a request for a supplement by signing an affidavit attesting to food or other losses due to the disaster. To reduce the burden on the household and county, any active FNS household that requests a replacement of August benefits between **August 27**, **2021 to September 27**, **2021** will be considered as making a request for a supplement for the month of August. **Request received after September 27**, **2021 for replacement of August benefits must be denied.**

III. AUTOMATION INSTRUCTIONS

A. General Automation Procedures

Effective October 4, 2021, NC FAST will be available:

Do not send tickets via Help Desk Portal for disaster, call the Disaster Command Center number at **919-813-5490**. Any designated county staff can contact the Disaster Support Center to receive assistance with Disaster SNAP applications. The hours of operation are 8:00 am to 6:00 pm.

Instructions for keying are in **FAST HELP**.

- 1. These instructions are to be used in conjunction with the DSS-1432 (Rev. 9/2021), Application for Disaster Food and Nutrition Services.
- 2. Conduct a thorough Person Search on each household member.
 Register applicant(s) if not already registered in NC FAST. For more information, refer to the Registering Persons Job Aid.
- 3. If an individual being researched appears in another FNS household for the month of application, do not include this individual in the disaster FNS household.

B. Application Approval

 All disaster applications must be completed through NC FAST process, even if there has been a previous FNS case for the household. This does not apply to Food and Nutrition Services cases that are active as of the time of the disaster.

NOTE: NC FAST will not allow an approval for an application when the county of residence is not one of the counties designated for DSNAP.

- 2. When approving the application in NC FAST enter all required fields.
 - a. All applications will have a **one-month certification period (CP)** of **08/16/2021 to 09/15/2021.**
 - b. Benefits will not be prorated. The system will default to the maximum allotment for the household size.
 - c. Do not enter a Work Registration Code for any individual.
- 3. After case activation, return to the PDC and add Disaster EBT card. This must be completed in order to link the PDC to the EBT card.

Note: SUI and PAN numbers keyed on incorrect cases must be resolved by the county. The county must retrieve the cards from the households involved and facilitate a switch.

C. Disposition of Applications Pending in NC FAST Prior to Disaster Application

- 1. If a pending regular FNS application is discovered when NC FAST is searched for an existing case, a Disaster SNAP Application can be entered and approved if found eligible. Process the regular FNS application following the disposal of the DSNAP application. The disaster month will show as ineligible in the regular FNS case and begin the CP for the following month.
- 2. Disaster SNAP cases cannot be converted to an ongoing case. If the applicant wishes to receive ongoing benefits, they must apply for regular FNS benefits.
- 3. NC FAST will automatically close disaster cases at the end of the disaster certification.

IV. EFFECTIVE DATE

This policy is effective for all Disaster applications submitted from October 4, 2021 through October 7, 2021. Submit any questions regarding this information to the Operational Support Team (OST) at dss.policy.questions@dhhs.nc.gov. To ensure these questions receive priority response, please include "Disaster" as the subject line when submitting.

Sincerely,

Carle & West

Carla West, Senior Director for Economic Security Division of Social Services, Economic and Family Services Section

CLW/rc

Attachments (14):

D-SNAP Application Time-frame poster English and Spanish

D-SNAP Anti-Fraud poster English and Spanish

D-SNAP Change EBT PIN poster English and Spanish

D-SNAP Current Eligibility poster English and Spanish

D-SNAP Identification poster English and Spanish

D-SNAP Line poster English and Spanish

D-SNAP EBT Handout English and Spanish

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