Guidance for Administering

Disaster Supplemental Nutrition Assistance Program (DSNAP)

during COVID-19 Pandemic

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Summary

This playbook has been jointly developed by a workgroup of staff from DHHS, NC FAST, and counties to help in the planning and implementation of a Disaster Supplemental Nutrition Assistance Program (DSNAP) program during COVID-19.

Keep in mind that this document serves as a guide only, and counties are strongly encouraged to develop procedures that will best serve the residents of their county in the most effective and efficient, yet safe, manner.

DSNAP policy is contingent upon the approval of a DSNAP program by the United States Department of Agriculture (USDA). All policy and civil rights mandates must be adhered to based on said approval. Therefore, this material serves as a guide only and does not contain any specific Food and Nutrition Services policy guidance.

Things to Consider

COVID-19 has forced all of us to think more creatively about how to administer benefits to our citizens. During a DSNAP program, that process can change drastically and force counties to explore even new innovative methods to provide these necessary benefits. It is imperative that counties have a plan that is efficient and safe, while meeting the prescribed federal timeframes.

Here are some guidelines for counties to consider as counties develop a plan to administer DSNAP benefits:

- Ensure all DSNAP policy and client civil rights are adhered to when administering DSNAP program.
- Consider current staffing and how you may leverage others within your county to assist in administering DSNAP.
- Consider size of the location, accessibility, and security for any sites to be used for taking and administering DSNAP applications and benefits.
- Try to incorporate processes that limit applicants having to leave and return to complete the DSNAP process.
- Create a public webpage with information and application paperwork, descriptions, and expectations of the process, and if applicable, available appointment dates and times for interviews.
- If telephonic signatures are allowed, consider establishing a call center or use existing capacities to man phones to complete application processes. Ensure messaging on phone lines is consistent with updated processes and routing for these calls.
- Provide interpreters via phone for populations who may have language barriers.
- Consider locations that can be secured and have visible signage for entrance and exit.
- Post instructions and reminders at entrances and in strategic places on hand hygiene, COVID-19 symptoms, wearing cloth face coverings, and cough and sneeze etiquette. This should include signs for non-English speakers, as needed.
- Consider setting-up "walk-through" stations or mobile operations, as vehicle-only options may limit who can be reached. (See models below.)
- Consider staggered application process and EBT card distribution by having set days for identified paraments (i.e., A-G Monday, H-L Tuesday, etc.), understanding that any client has the right to apply at any time and DSNAP policy around timeframes must be followed.
- Provide services that extend outside of normal business hours.
- Identify locations for possible drop-off of paper and/or completed applications (boxes or drive through options). Establish procedures for pick up and processing of dropped off applications and communicate with the community said procedures.(Note: If utilizing community partners for drop-off paper applications, make sure they are aware of timeframes around distribution and cutoffs for DSNAP applications.)
- Consider use of technology that may allow scanning of documents and verifications without touch to be submitted. Video conferencing platforms may also be utilized to conduct interviews and applications.
- Have personnel on-site utilizing personal protective equipment (PPE) and practicing social distancing.

- Plan to work with media early to discuss changes in administration and how they can help foster awareness of benefit availability.
- For crowd control, law enforcement or some other type of security personnel may be needed. However, this may reduce the likelihood of certain populations from utilizing the services.
- To the extent possible, counties should consult with and follow recommendations related to the their current COVID-19 response.
- Anyone who has access to an applicant's confidential information must ensure they comply with confidentiality and privacy obligations.

Drive-Through Models

Counties with available site options, consider utilizing a drive-through model to receive completed applications, and/or to distribute cards. These could look like current COVID-19 testing sites as utilized by counties. See Appendix for [Drive-Through Model Examples A and B.](#)

When considering a change in process for DSNAP, counties should ensure they develop and implement good communication processes to make the public aware of application processes. Suggestions for consideration regarding broader public communications can be found in the section "[Communicating DSNAP Availability and Processes](#)."

Things to consider when determining whether to use this model:

- **Site Layout:**

    o   Is the site logistically sufficient - size of space, security, and accessibility? Identify locations that can be centrally located and accessed by all segments of the community.

    o   Identify what processes will be handled at site(s) and clearly communicate such information. If you intend applicants to already have their applications completed, how will you handle when someone has not completed the application prior to arrival?

    o   How will traffic flow be impacted? Develop a flowchart with layout and traffic flow through the site to assist in identifying any bottlenecks and other trouble spots.

    o   Identify how you will protect staff and supplies from weather elements.

    o   Identify where to store supplies and ensure they can be secured appropriately.

    o   Can checkpoints be utilized to assist in maximizing efficiencies? This may include having a checkpoint for application completion before entering interview and benefit administration or utilizing a numbered ticketing system that allows for applicants to pull into designated spaces and call/text when paperwork is completed and ready for review.

    o   Consider utilizing websites and fillable PDF files online to provide access to applications and affidavits to be completed and signed before an applicant comes to the drive-through site. Applicants can print applications and bring with them to speed up the process and limit time in contact with others. Having a designated online submission location (such as secure email options) may also be an option. Having this option may allow for applicants to bypass that station/checkpoint and proceed straight to interviews or EBT card pickup. Counties may also be able to utilize secure file transfer to work with unaffected counties to have applications processed, allowing affected counties to concentrate on EBT card distribution.

- If application and benefit issuance will not be at the same site, identify how you will give directions to EBT card pick up locations.

- Be prepared to batch and store applications several times per day, depending on volume and technology availability on site, and counties should take into consideration data security and privacy concerns. The time delay associated with this method should also be considered as delays in data entry can result in delayed issuance and benefit access for households in need.

- How will you address applicants without private vehicles? Will you have a walk-up station or signage identifying vehicle traffic only?

- Ensure you have facilities for human needs available. These could include, but are not limited to:

  - Portable toilets
  - Tents
  - Chairs and Tables
  - Water
  - First Aid

- Identify PPE possibilities to be utilized by staff and applicants throughout the process. (Examples: ticket booths with plexiglass barriers already installed, windows, disposable gloves, and masks, etc.)

• Staffing:

- Do you have adequate staff or access to additional county staff to handle crowd control, application taking, benefit processing, EBT card counts and reporting daily? Train other available DSS staff to conduct interviews or to screen applications for completeness.

- Staff should be available to deliver batches of applications several times per day, depending on volume and technology availability on site. Take into consideration data security and privacy concerns. The time delay associated with this method should also be considered as delays in data entry can result in delayed issuance and benefit access for households in need.

- How will you address applicants with limited or no proficiency in English or those with hearing and/or sight impairments? Use interpreters from other county departments if possible. Utilize a language line during transactions or identify interpreters you may be able to contract. Consider working with universities/colleges, churches, or community organizations who may have volunteers who can assist with translation as well. Volunteers may not participate in certification, data entry, interview, or issuance functions.

- Consult with law enforcement for security needs such as traffic flow and safety. Ensure that EBT cards are secured and that those who receive EBT cards are safe from acts of theft.

- Consider how you might utilize non-affected counties to assist your county.

- **Signage, Communication, & Right-of-Ways:**

  o **Required signage, such as program integrity and Americans with Disabilities Act, provided by the Division in Disaster packets must be incorporated at all sites.**

  o Utilize various forms of signage including posted signs as well as handouts, flyers, or other means to communicate clearly and consistently.

  o Create a public webpage with information and application paperwork, descriptions, and expectations of the process, and if applicable, available appointment dates and times for interviews.

  o Make sure to have adequate signage to help alleviate confusion and help with traffic flow and efficient processing. (Examples: "DSNAP Parking," "TEXT xxxx to let us know you are here with a DSNAP application," "TEXT xxxx to let us know you are here to pick up your EBT card," "ENTRANCE/EXIT" "Application submission" "Interviews" "EBT Card pick-up".) Ensure signage is in multiple languages.

  o Utilize temporary variable or changeable sign trailers to assist in giving directions or information earlier in the process while applicants are waiting in line inside their cars. (Examples: "Please pull forward to the designated space and remain in your vehicle." "DSNAP applications only. If you are currently receiving FNS assistance, please contact your worker for steps to address your needs." "There is a three-hour wait from here. Applications will be taken at this site until 7:00 p.m. every day through Friday.") Ensure signage is in multiple languages.

  o DHHS will utilize Alerts and provide information to 211 to let current FNS clients know they do not need to complete a DSNAP application, but rather to contact their caseworker for additional assistance as needed. Utilizing local posting and options, such as robocalls, may assist in this as well.

  o Coordinate with media to establish communications for DSNAP administration and processes.

- **Supplies:**

  o Make sure you can be well supplied as sites may not be located near usual DSS offices. Needs may include, but are not limited to applications, eligibility checklists, worksheets, desktop supplies, clipboards, tape, calculators, handouts, phones, copy/scanner devices, and sanitizing products.

  o Make sure you have enough supplies to last the duration of DSNAP. This also includes ensuring you have enough supplies so that they may be sanitized routinely without causing delays in processes.

  o Supplies utilized by public should be sanitized immediately per county protocols to minimize COVID-19 risks.

  o Ensure power is available to support operations.

- Identify where you will store supplies and EBT cards, keeping in mind that cards must be kept in a locked, secure location at all times when not being distributed. EBT cards must also be secure at the distribution site and at least two people should always be involved in card distribution.

- Designate a person to serve as contact for additional supply needs.

- PPE as needed for staff and applicants to utilize throughout the process.

Online/In-Person Models

A county may identify they do not have the staffing or site options to feasibly make a drive-through model work. In those situations, DSNAP may still be administered in-person or as a combination of online and in-person while also taking into consideration current COVID-19 limitations.

When considering a change in process for DSNAP, counties should ensure they develop and implement good communication processes to make the public aware of application processes. Suggestions for consideration regarding broader public communications can be found in the section "Communicating DSNAP Availability and Processes."

Note: DSS and NC FAST are currently working towards technology and automation improvements however, these may not fully be available before the end of the current hurricane season. Counties should be prepared to implement other COVID-19 considerations beyond these improvements so that if a DSNAP program is deployed, counties are able to administer a program safely and efficiently.

- **Site Layout:**

  - Is the site logistically sufficient - size of space, security, and accessibility? Identify locations that can be centrally located and accessed by all segments of the community, including elderly and disabled applicants and is able to allow for social distancing.

  - Consider a separate location or entrance/exit other than normal business locations to conduct DSNAP. Ensure it is secure, has adequate parking (including ADA compliance), and is accessible under the same guidelines for DSS buildings.

  - Ensure there is adequate parking for applicants to access.

  - Consider utilizing websites and fillable PDF files online to provide access to applications and affidavits to be completed and signed. Applicants can print applications and bring with them to speed up the process and limit time in contact with others. Having a designated online submission location (such as secure email options) may eliminate the need for an applicant to come into the office to apply. EBT cards could be provided for pick up at designated times. Counties may also be able to utilize secure file transfer to work with unaffected counties to have applications processed, allowing affected counties to concentrate on EBT card distribution.

  - If utilizing a drop box for applications, ensure disinfecting is occurring on a regular basis. Employ marking indicators for social distancing and signage that identifies what the process will be for dropped off applications. Consider having a drop off location for applicants to deposit completed applications and wait in their car or another location to complete interview via phone and then return to a designated pick up location to receive their EBT card upon approval.

- Consider delivering applications to community sites (i.e. churches, senior centers, libraries, community action agencies, shelters, etc.) where applicants can complete them and send them to you to be processed. If you choose this option, take into consideration any timeframes associated with it and compliance in DSNAP policy. Applications and client information must be secure and kept confidential, so it is not encouraged for them to be left at the community site to be held for staff pick up.

- Be prepared to deliver batches of applications several times per day, depending on volume and technology availability on site, and take into consideration data security and privacy concerns. The time delay associated with this method should also be considered as delays in data entry can result in delayed issuance and benefit access for households in need.

- For applicants entering locations, utilize COVID screening procedures as identified in your county's current COVID response. These screening procedures should consider both staff and applicants and protocols should be followed accordingly. Identify how you will provide the opportunity for those who may not be able to enter a facility to apply for DSNAP benefits.

- To limit foot traffic and contact with others if the client must return to pick up the EBT card, consider having a separate location specifically for this task or a design a drive-through option that allows the client to have an appointment time to pick up the card.

- Identify PPE possibilities to be utilized by staff and applicants throughout the process. (Examples: windows with plexiglass barriers already installed, kiosks that can quickly be disinfected, disposable gloves and masks, etc.)

- Consider use of ropes and barriers with 6-foot spacing markers to establish lines and direct traffic through the site. To minimize contact with other applicants, identify possible right-of ways that limit access to the building to one way in and one way out.

- Utilize checkpoints to assist in maximizing efficiencies. (Example: Having a checkpoint for application completion before entering interview and benefit administration areas. Utilizing a numbered system that allows for applicants to text/call and be placed in line that allows for them to wait in their cars until their number is called to be served.)

- **Staffing:**

  - Identify staff who may engage in the DSNAP process from various perspectives.

    - Utilize in-person staff for taking applications, interviews, and EBT card distribution or a combination thereof.

    - Remote workforce may be able to process mail-in, online or dropped off applications as well as conduct interviews (as approved by waiver).

    - Train other available DSS staff to conduct interviews or to screen applications for completeness.

- Staff should be prepared to deliver batches of applications or EBT cards several times per day, depending on volume and technology availability on site. Take into consideration data security and privacy concerns. The time delay associated with this should also be considered as delays in data entry can result in delayed issuance and benefit access for households in need.

- How will you address applicants with limited or no proficiency in English or those with hearing and/or sight impairments? Use interpreters from other county departments if possible. Utilize a language line during transactions or identify interpreters you may be able to contract. Consider working with universities/colleges, churches, or community organizations who may have volunteers who can assist with translation as well. Volunteers may not participate in certification, data entry, interview, or issuance functions.

- Ensure proper COVID screening protocols are being followed to minimize exposure risk to applicants and staff.

- Identify any COVID and PPE training staff may need to ensure safety and minimize exposure risk.

- Consult with law enforcement or security for security needs such as facility traffic flow and safety. Ensure that EBT cards are secured as well those that receive EBT cards are safe from acts of theft.

- Consider how you might utilize non-affected counties to assist your county.

• Signage, Communication, & Right-of-Ways:

- **Required signage, such as program integrity and Americans with Disabilities Act, provided by the Division in Disaster packets must be incorporated at all sites.**

- Utilize various forms of signage including posted signs as well as handouts, flyers, or other means to communicate clearly and consistently.

- Create a public webpage with information and application paperwork, descriptions, and expectations of the process, and if applicable, available appointment dates and times for interviews.

- Make sure to have adequate signage to help alleviate confusion and help with traffic flow and efficient processing. (Examples: "DSNAP Parking," "TEXT xxxx to let us know you are here with a DSNAP application," "TEXT xxxx to let us know you are here to pick up your EBT card," "ENTRANCE/EXIT" "Application submission" "Interviews" "EBT Card pick-up".) Ensure signage is in multiple languages.

- DHHS will utilize Alerts and provide information to 211 to let current FNS clients know they do not need to complete a DSNAP application, but rather to contact their caseworker for additional assistance as needed. Utilizing local posting and options, such as robocalls, may assist in this as well.

- Coordinate with media to establish communications for DSNAP administration and processes.

- **Supplies:**

  - Make sure you can be well supplied as sites may not be located near usual DSS offices. Needs may include, but are not limited to applications, eligibility checklists, worksheets, desktop supplies, clipboards, tape, calculators, handouts, phones, copy/scanner devices, and sanitizing products.

  - Make sure you have enough supplies to last the duration of DSNAP. This also includes ensuring you have enough supplies so that they may be sanitized routinely without causing delays in processes.

  - Supplies utilized by public should be sanitized immediately per county protocols to minimize COVID-19 risks.

  - Ensure power is available to support operations.

  - Identify where will you store supplies and EBT cards securely.

  - Designate a person to serve as contact for additional supply needs.

  - PPE as needed for staff and applicants to utilize throughout the process.

Possible Alternative Site Locations

Regardless of model, counties may choose to have separate locations for DSNAP processes (application completion, drop off, interviews, card distribution, etc.) to mitigate possible COVID exposure and concerns. Consider whether the site chosen has adequate parking, restrooms, availability for PPE use, signage options etc. Consider whether waiting applicants may be subjected to inclement weather conditions. If the disaster is pending, select an alternate site in case the primary site is unavailable for any reason. While the following list is not exhaustive, some alternative sites to administer DSNAP could include:

- **DSS or other county facilities**

- **Schools**

- **Churches**

- **Community colleges, colleges, and universities**

- **Community Centers**

- **Vacant storefront buildings**

- **Vacant shopping center parking lots**

- **Fairgrounds**

- **Event centers (Coliseums, Stadiums, etc.)**

- **Parking Decks**

- **Drive-In Theatres**

- **Mall/Shopping Center parking lots**

- **National Guard Armories**

Working with Non-Affected Counties

Temporary assignments to assist counties affected by disaster may be available for non-affected counties. Affected counties considering this option will need to contact the Division before making any assignments. When making this request, be prepared to specify the type of workers needed and what their job will be. Some possible activities non-affected counties may be able to assist with include, but are not limited to:

- Application keying

- Application processing

- Translation services

- Applicant telephone interviews

- Sending staff to disaster affected counties to assist

Note: DSS and NC FAST have worked, and continue to work, to streamline processes for non-affected counties to assist with DSNAP. While not all processes indicated below may be available before a disaster occurs, some of these planned improvements that may help identify ways non-affected counties may help include:

- Eliminating the need for non-affected workers to secure a second NCID to assist in DSNAP.

- Automation that would identify disaster vs. non-affected case workers and route assistance accordingly.

- Utilizing work queues, in conjunction with ePass applications, to process applications for disaster counties. This would possibly allow disaster counties to focus on card distribution efforts.

- Updating existing functionality to streamline notices and online verification specifically for DSNAP processes.

Communicating DSNAP Availability and Processes

It will be essential to have a communication plan prepared, to the extent possible, in advance to administering DSNAP. This will help applicants identify and plan on how to engage the county for DSNAP **AND** Replacement FNS benefits. Communication plans should be updated and prepared in advance so that they can be presented to DSS when a disaster occurs.

Materials should include DSNAP sites (including what processes are conducted at the sites). It is important to indicate the operating hours/days at each site, including if applications will be accepted on weekends or beyond normal business hours. Counties should also indicate where and how current FNS recipients can access replacement benefits as well.

Finally, counties should include what clients will need to bring or are encouraged to bring to assist in speeding up processing. This could include an application or affidavit already completed for benefits, any verifications encouraged, etc.

Below are some avenues to consider in your efforts to keep the public informed on how they can apply for assistance

- **DSS and other local government buildings**

- **Local tv and radio stations and newspaper outlets**

- **County webpages (consider including access to the application, affidavit, and information around operations for DSNAP as well as replacement benefits for FNS recipients)**

- **Utilize phone scripts and hold messaging for updates and information regarding DSNAP processes. Messaging could include hours for DSNAP, where to go online for information or application needs, or other pertinent information that directs clients to alleviate in-office volume.**

- **County social media messaging**

- **211 collaboration**

- **Other community partners who may be able to assist in communications, including DSNAP site hosts or partners who may be able to link application options to their websites. (Note: Counties will need to ensure community partners are aware of DSNAP timeframes for making applications available and when the cutoff dates occur.)**

Assistance to Active FNS Households

Active FNS households do not need to complete a DSNAP application; they only need to complete a replacement affidavit if food was lost due to flooding or power outages during the disaster (unless replacements have already been automatically issued). In addition, active FNS households' identities and circumstances are already known to the agency, so they do not need to participate in a DSNAP interview.

For policy information regarding replacement benefits, please see FNS 910 Replacement of Authorized Issuance in the FNS Manual. As an additional reminder, DSNAP Policy and Admin letters are available for review to assist with DSNAP assistance.

If active FNS clients are being served at the same site as DSNAP applicants, counties may want separate lines and workers designated to work with each group to expedite the process and mitigate COVID exposure risks.

Resources

The following resources are available for staff to utilize in preparing for DSNAP administration during the COVID-19 pandemic:

- Policy Manuals

  - FNS Policy Manual

  - DSNAP Policy

- FAST Help Resources

  - Disaster Intake

  - Disaster Resources

  - Disaster DSS-8551 Notice Text

- Learning Gateway Resources

  - Disaster Application and Interview

  - Disaster Progress and Planning

  - Disaster Replacements and Supplement

  - Disaster Resources

- COVID-19 Resources

  - NCDHHS COVID-19 Website

  - NCDHHS COVID-19 Dashboard

  - NCDHHS COVID-19 Information for Local Social Services Agencies

  - NCDHHS COVID-19 Resources and Materials

  - NCDHHS Hurricane Season and COVID-19

  - CDC COVID-19 Resources for Communities, Schools, Workplaces, and Events

Appendix

DRIVE-THROUGH EXAMPLE A:

Set up allows for drive through processing like an assembly line approach and allows for applicant to apply and receive benefits at one time.
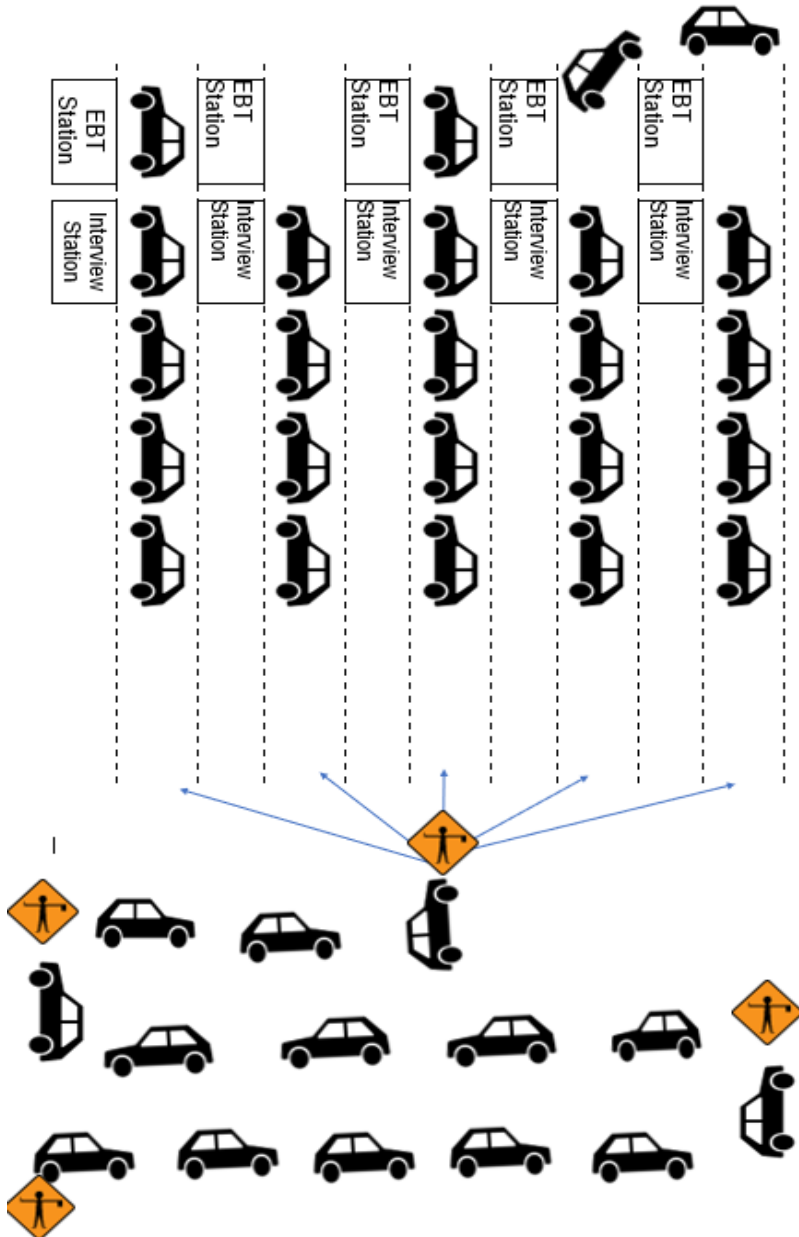
DRIVE-THROUGH EXAMPLE B:

Set up can be used for drive through process as below or for parking needs for ticketing/numbering system that allows for applicant to notify DSS that they are at site and wanting to apply for DSNAP benefits. It can also be used for EBT card pick up only. Counties could use instructional signs to let applicant know how to engage process at site.
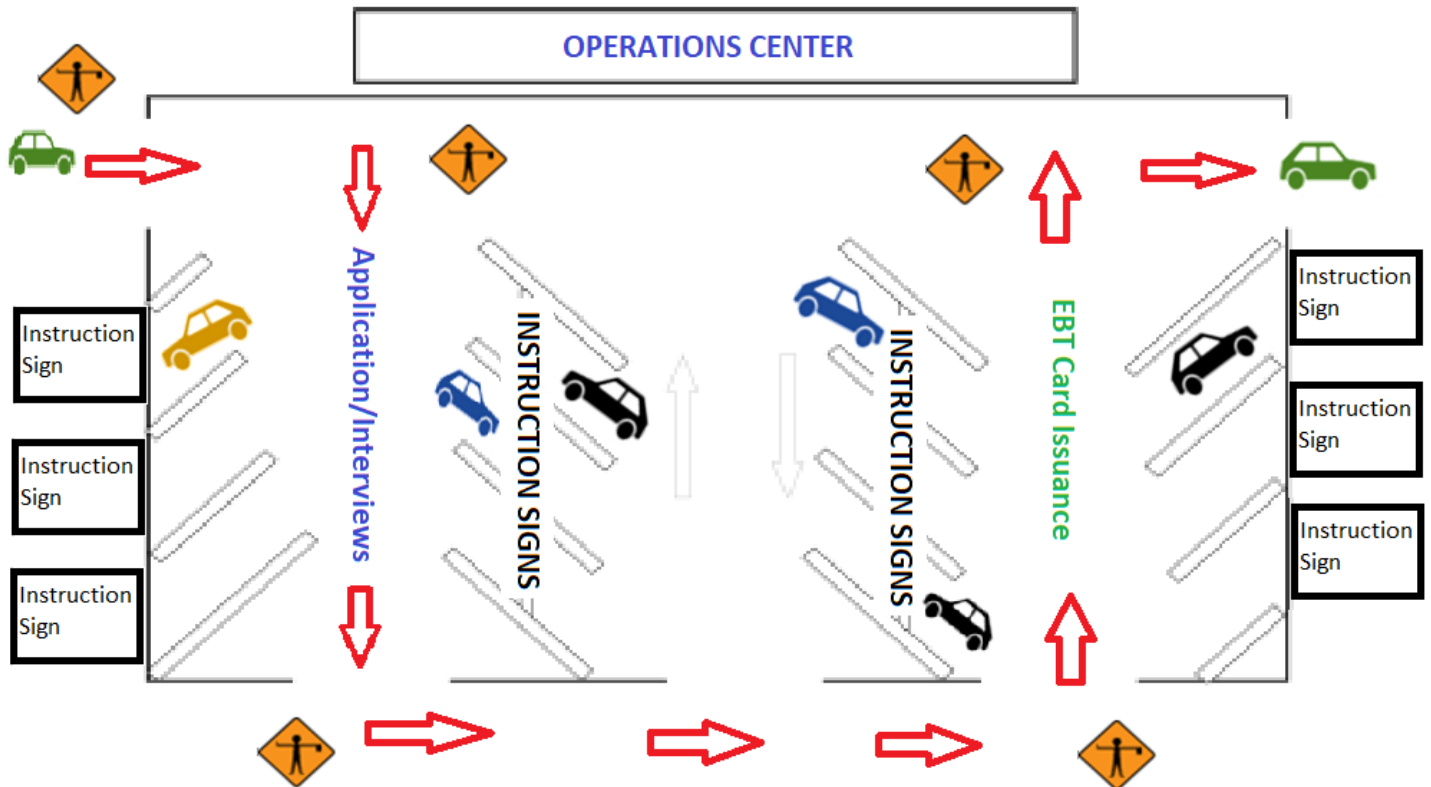
IN-PERSON STATION OR WALK-THROUGH EXAMPLE:

Set up could be used to administer full application process or possible hybrid of online application with in-person EBT card pick up. If using for full application process, consider setting up separate location nearby or on same site with EBT card pick up so that applicants can walk through and not have to return for EBT card pick up.

EXIT

ENTRANCE