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Employees' Manual  
Title 7  
Chapter L

# **DISASTER FOOD ASSISTANCE PROGRAM**



**Iowa Department  
of Human Services**

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	<u>Page</u>
<b>Overview .....</b>	<b>1</b>
Definitions .....	2
<b>Central Office Planning and Preparation.....</b>	<b>4</b>
Central Office Pre-Declaration Planning .....	5
Central Office Requesting Permission to Implement the Program .....	5
Central Office Waivers to Consider Requesting .....	9
Coordinating With Presidentially Declared Disaster Counties.....	10
Spoiled Food Requests.....	11
Anticipating Staffing Needs .....	11
<b>Local Office Responsibilities.....</b>	<b>12</b>
Supervisory Preparation for Disaster Program .....	12
Department of Inspections and Appeals (DIA) DFAP Role.....	13
Preparing to Deploy the Disaster Program .....	14
<b>Processing DFAP Applications .....</b>	<b>15</b>
FAP vs. DFAP .....	15
Household Eligibility Requirements .....	17
Adverse Effect .....	17
Eligible Disaster-Related Expenses .....	18
Food Purchase.....	18
Income and Resource Test for New Households (Available Funds) .....	18
Residency.....	19
Subsequent Applications for Regular Food Assistance.....	19
DHS Employee DFAP Applications.....	19
Claims and Lost Benefits.....	20
<b>Operating in a Pandemic .....</b>	<b>21</b>
Limited Public Contact - Applications .....	21
Interviews and Verifications .....	21
EBT Cards and Benefit Issuance.....	22
Waivers to Consider Requesting (Pandemic) .....	23
<b>DFAP Quality Control Review .....</b>	<b>24</b>
Post-Disaster QC Review.....	25
Participation Review.....	25
Client Interview .....	26
Application Review.....	26
Disaster-Related Expenses .....	26
Food Loss .....	26
Verification of Income Sources.....	27
Residency.....	28

---

	<u>Page</u>
Eligibility Redetermination.....	28
Claim Determinations.....	28
Quality of Service Summary.....	28
Problem Analysis Review.....	29
Final DFAP QC Report.....	29
<b>Central Office FNS Reports.....</b>	<b>30</b>
Daily DFAP Report.....	30
FNS-388.....	31
Other Reports.....	31
<b>Post-Disaster FNS Reports.....</b>	<b>31</b>
FNS-292.....	31
Post-Disaster Report.....	32

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## **Overview**

**Legal reference:** 7 CFR 280, Food and Nutrition Service (FNS) Handbook 320 (Disaster Handbook)

This chapter is the Disaster Food Assistance Program (DFAP) handbook for Iowa's central office administration, local office administration, and Quality Control procedures. State operation of the DFAP may vary with each disaster, but the basic principles and framework in this chapter apply to all disasters. See 7-L-Appendix for Comm. 388, the certification worker handbook for the program.

Specific federal approval must be obtained in order to implement a DFAP. **In no instance shall any local office implement DFAP without receiving specific instructions from central office to do so.**

A disaster may be officially recognized on a state level only or on both a state and federal level:

- ◆ A presidential disaster proclamation authorizes federal funds to assist the state with disaster response and cleanup. The areas covered under a presidential disaster declaration are posted on the Federal Emergency Management Agency (FEMA) website at <http://www.fema.gov>.

There are two types of presidential disaster declarations:

- FEMA uses the term **individual assistance** to approve help for individual households. A presidential disaster proclamation for individual assistance authorizes federal funds for individual households. An individual proclamation is required for DHS to apply to Federal Nutrition Service (FNS) for the DFAP.
  - A presidential disaster proclamation for public assistance only authorizes federal funds for costs of restoring public infrastructure. It does not provide funds for individual households. A public assistance proclamation does **not** allow DHS to request DFAP implementation.
- ◆ A governor's disaster proclamation authorizes state disaster programs to begin. The governor may or may not request federal help in conjunction with implementing a state-funded disaster response. A governor's disaster proclamation does **not** authorize the Department to implement the DFAP.

When a presidential disaster proclamation is issued for individual assistance, the state may ask permission from the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) to implement the DFAP. DFAP is **not** automatically authorized.

It is important for all who work with the regular Food Assistance program to understand that:

- ◆ The DFAP and the regular Food Assistance program have different rules.
- ◆ People who do not qualify for the regular program may qualify for DFAP. Examples include:
  - Ineligible or undocumented aliens
  - Ineligible students
  - Disqualified household members
- ◆ Households who receive benefits from the regular Food Assistance program may qualify for extra (supplemental) DFAP benefits. The amount cannot exceed a full allotment for the month of disaster.

### **Definitions**

The following terms are defined as used in the DFAP:

**"Application for Disaster Food Assistance"** is the form new households complete when applying for DFAP benefits. A face-to-face interview is required for clients who complete the *Application for Disaster Food Assistance*, form 470-4904.

**"Application period"** means the dates that Food and Nutrition Service (FNS) authorizes the state to accept *Applications for Disaster Food Assistance* and *Statements of Loss of Income or Disaster-Related Expenses*. Applications and statements of loss cannot be accepted before or after the application period authorized by FNS.

DFAP application periods are assigned to each area as approved by FNS. FNS usually authorizes an application period of five to seven days. The federal approval letter will state if the days are calendar or business. Central office must provide the period for taking applications to each area implementing the DFAP.

Application periods may vary for different areas affected by the same event. For example, a flood that is declared a disaster can worsen over time, creating additional disaster areas. The state must ask for a new presidential disaster declaration for each new area of damage, even though a singular event brought about the disaster. This would result in different application periods.

**“Director”** means the director of the state’s Food Assistance program. For Iowa, this is the chief of the Bureau of Financial, Health and Work Supports.

**“Disaster area”** means an area that received a presidential disaster declaration for individual assistance. FEMA defines the disaster area. Disaster areas can range from a few blocks to an entire town, one or more counties, or statewide. Entire counties have historically been the most common disaster areas.

Areas that do not receive a presidential declaration for individual assistance are not eligible to operate the DFAP. These areas are not considered **disaster areas** for the DFAP.

The state may choose to allow those working, but not living, in the disaster area to be eligible for benefits. Central office will notify the field if this exception is approved.

**“Disaster certification period”** means the dates for which disaster benefits are authorized. The disaster certification period is a 30-day period of time, not a calendar month. The disaster certification period will most likely span two months starting in one month and ending in the next. FNS provides the disaster certification period dates when authorizing implementation of the DFAP.

Central office provides the dates of the disaster certification period to the disaster area before implementing DFAP. These dates are very important. For example, the dates for the disaster certification period are used to determine:

- ◆ If a household is considered new or ongoing for the regular program;
- ◆ How much a household has in **available funds** for DFAP eligibility;
- ◆ The start date for a subsequent certification period for regular Food Assistance.

**“EPPIC™”** means the state’s electronic benefit transfer (EBT) system.

**“New household”** means an applicant household that has not received regular Food Assistance benefits in either the month before or the month of application. New households must complete the *Application for Disaster Food Assistance*, form 470-4904, to be considered for disaster benefits. New households **must** have a face-to-face interview. Households with a **pending** regular Food Assistance application with the local office are considered as **new** and not **ongoing** households.

If eligible, new households must receive their Vault Cards within three days. If the application is questionable, workers may hold the application for no more than seven days to allow for an investigation.

**“Ongoing household”** means a DFAP applicant household that received regular Food Assistance benefits at any point during the two months of the disaster certification period. Ongoing households **cannot** be required to have an interview. They are only required to complete the *Statement of Loss of Income or Disaster-Related Expenses*, form 470-4903 or 470-4903(S). If approved, ongoing households receive a supplement to their monthly Food Assistance benefits bringing them up to the maximum benefit amount for their household size. Households with a **pending** regular Food Assistance application with the local office are considered **new** and not **ongoing** households.

**“Statement of Loss”** means the form that an ongoing Food Assistance household uses to apply for disaster benefits. The official name of the form is 470-4903, *Statement of Loss of Income or Disaster-Related Expenses* (English), or 470-4903(S), *Declaración de pérdida de ingresos o gastos debido a catástrofe* (Spanish).

**“Vault Cards”** means the EBT cards used during a disaster. These cards are normally given to applicants immediately following the face-to-face interview.

### **Central Office Planning and Preparation**

Prepare to implement a DFAP when the governor asks for a presidential declaration for individual assistance. DHS will likely have DFAP conversations with FNS before DFAP approval, but may wait for the federal response before contacting FNS to apply for approval.

The order of authority to implement the program is as follows:

- ◆ The governor is the authority for making the request for a presidential disaster declaration for individual assistance. The response from the federal government may take hours to weeks, depending on the severity of the disaster and other damage assessments.
- ◆ The President is the authority to grant individual assistance, which gives the state authority to ask permission to implement the DFAP.
- ◆ Iowa’s Food Assistance director is the authority for asking permission from the Mountain Plains Regional Office (MPRO) of the USDA FNS to implement the DFAP.
- ◆ MPRO, with guidance from the FNS National Office, is the authority to approve or deny a request to implement the DFAP.

See also form 470-4905, [Central Office Disaster Food Assistance Checklist](#), in 7-L-Appendix.

### **Central Office Pre-Declaration Planning**

There are many things to consider before making a request to implement the program, as detailed in this chapter. Some of these things should be done in anticipation of being approved to implement the program.

Before a request is submitted:

- ◆ Consider locations where DFAP will operate. Gather as much information as possible about damage assessment and households and businesses affected.
- ◆ Learn whether grocery retailers are operating in the disaster area and if not, when the retailers anticipate reopening.
- ◆ Determine if waivers are needed. See [Central Office Waivers to Consider Requesting](#) for more information.
- ◆ Make an informal request for the DFAP by phone to MPRO. To the extent possible, provide MPRO with information that will be needed for the formal request. MPRO will:
  - Provide suggestions and guidance to meet the needs of the disaster victims;
  - Suggest waivers that may benefit the state and the victims;

### **Central Office Requesting Permission to Implement the Program**

Once the presidential declaration is approved for individual assistance and DHS decides to pursue the implementation of DFAP a written request should be drafted and sent to FNS immediately.

The chart below explains the federal informational requirements and can be used as a checklist for preparing the request. Include a similar chart with the information specific to the event as an attachment to your written request asking MPRO to implement a DFAP.



Send a scanned signed copy of the request to implement the program to MPRO by email. The original signed copy may be sent by regular mail. Include all information FNS needs to evaluate the request. MPRO generally responds to a request within 24 hours of receipt of all necessary information.

Inform the Iowa FNS staff when the decision has been made to request DFAP approval. They are located in the Federal Building in Des Moines. Keep the Iowa FNS office informed daily as to the progress of requesting the implementation, rolling out, and operational decisions.

<b>Federal Information Requirements for the Program Request</b>	
<b>Requirement</b>	<b>Explanation</b>
Date and type of disaster	Describe the event (tornado, flood, ice storm, etc.).
Description of geographic areas in need of assistance	<p>Define the geographical area in which the program will run. Provide maps, if available.</p> <p>The area is crucial to the success of the program. Define an area that strikes a balance between being large enough to serve those in need and limited enough to reduce the possibility that people who were not seriously affected by the disaster will apply and qualify for benefits.</p> <p>Defining factors could include:</p> <ul style="list-style-type: none"> <li>◆ ZIP code</li> <li>◆ Neighborhood or subdivision</li> <li>◆ Power grid location</li> <li>◆ City or town</li> <li>◆ County</li> </ul>
Statutory prerequisites	<p>State that:</p> <ul style="list-style-type: none"> <li>◆ A presidential declaration has been granted.</li> <li>◆ Commercial channels of food distribution are available (or estimate when they will be restored).</li> </ul>

Requirement	Explanation
Determination that low-income households have lost food or are unable to purchase sufficient nutritious food	<p>If food loss due to power outage is a criterion, state:</p> <ul style="list-style-type: none"> <li>◆ Duration of power outage</li> <li>◆ Geographical limits of outage</li> <li>◆ Percentage of customers affected by outage</li> <li>◆ Whether food loss alone will or will not qualify a household for the program</li> </ul> <p>NOTE: Outages of over four hours are associated with spoilage of refrigerated food.</p>
Proof that the food needs of affected households cannot be met by the regular Food Assistance Program	<ul style="list-style-type: none"> <li>◆ The program is needed to account for household disaster-related expenses not normally deducted for regular Food Assistance.</li> <li>◆ The Department cannot adequately serve the expected volume of applicants using regular Food Assistance program.</li> </ul>
Estimate of the number of households expected to apply	Give separate figures for ongoing households expected to ask for supplemental benefits and for new applicants for disaster assistance.
Expected length of application period	<p>Give start and end dates for the period you want to take program applications. Suggest a period not to exceed seven days. State whether the period of time is for calendar or business days.</p> <p>NOTE: It is better to request fewer days initially and then extend if necessary. Discuss this decision with MPRO before submitting the request.</p>
Expected length of the disaster certification period	Give starting and ending dates for a 30-day period.
Description of any additional waivers requested	Give a complete description. See <a href="#">Central Office Waivers to Consider Requesting</a> for more information.

Requirement	Explanation
Description of residency requirement	<p>State whether working in the disaster area but not living it will be considered an eligibility factor or if only those living in the disaster area will be eligible.</p> <p>NOTE: Communities with large employers may have many long distance commuters whose income is seriously affected by the loss of work. In this situation, you may want to include people who work in the disaster area.</p> <p>For example, many commuters from Indianola work in Des Moines. The employers in Des Moines are shut down due to flooding. The Indianola households would suffer as much as the Des Moines households from the shut down and loss of income.</p>
Description of security plan	Give a brief description of who is handling security (e.g., National Guard, local law enforcement, FEMA).
Description of crowd control measures	Give a brief description (same as security entry above).
Description of fraud control measures	Give a brief description (posters, volunteers, state employees, Department of Inspections and Appeals (DIA), etc.).
Description of process by which applications will be processed and benefits issued	<p>Estimate how long it will take to process applications. (6-8 minutes each if benefits issued on site.)</p> <p>If applications are processed on site but entered at a remote site, include the time it will take to transport applications and to complete EPPIC™ transactions.</p> <p>Where applicable, specify different procedures for:</p> <ul style="list-style-type: none"> <li>◆ Ongoing households</li> <li>◆ New applicants</li> <li>◆ Special needs populations (elderly, disabled, SSI)</li> </ul>
Plans for notifying the public	Describe plan for publicizing the program availability.
Quality Control (QC) and monitoring	Describe the Quality Control monitoring program for the disaster benefits.

**Central Office Waivers to Consider Requesting**

Request the appropriate waivers at the same time that you submit the request to implement the DFAP. MPRO will suggest waivers that may assist in managing the situation and the aftermath.

Policy Area/ Legal Reference	Requested Change to Policy	Description of Changes
Replacement period for regular Food Assistance benefits due to spoiled food 7 CFR 274.6(b)	Extend period for households to request replacement benefits.	This waiver allows the Department to extend the amount of time households have to report the loss of food purchased with Food Assistance benefits beyond the normal 10 calendar days. It may be appropriate if the state has determined that circumstances of the disaster make it difficult for clients to report losses.
Automatic replacement of Food Assistance benefits 7 CFR 274.6(b)(1)	Replace a portion of ongoing households allotments without requiring households to ask for a replacement.	This waiver allows the Department to automatically issue a replacement of a percentage of each affected household's monthly allotment.  The replacement percentage is not fixed and generally depends on the time of the month in which the disaster took place.  Under this waiver, households will not have the added burden of signing paperwork and local offices will not have to process cases manually for each household needing a benefit replacement.
Hot foods 7 CFR 271.2 <i>Eligible Foods</i>	Allow clients to purchase hot foods and hot food products prepared for immediate consumption.	Allows clients who may not have access to functional cooking facilities to have hot meals.

### **Coordinating With Presidentially Declared Disaster Counties**

Work directly with senior Department staff in the disaster counties to determine where the program will be offered. The DFAP:

- ◆ May be present at sites where FEMA and other disaster response agencies are located. Determine these sites with the help of the local office managers.
- ◆ Local office managers have previously found it easier to operate out of their local offices because computer systems and printers are already available. Discuss options with local office managers.

The program is intended to provide benefits to victims as quickly as possible. Disaster benefits, including supplements, **cannot** be issued through ABC. Disaster eligibility workers must issue benefits directly through EPPIC™, the state's EBT system.

Approved households will receive an Electronic Benefit Transfer (EBT) Vault Card on site. They are able to use the benefits on the Vault Card immediately upon completion of the EPPIC™ entries.

NOTE: Vault Cards are pre-set with a personal identification number (PIN). The PIN is the last four digits of the 19-digit number on the front of the card. Workers should encourage applicants to call the number on the back of the Vault Card and change their PIN immediately.

To facilitate quick delivery of service:

- ◆ Anticipate technology needs such as internet connections, computers or laptops.
- ◆ Deploy Vault Cards to the disaster counties before the application period begins.
- ◆ Obtain, as soon as possible, from the disaster counties the names of staff selected to certify applicants for the DFAP.
- ◆ Give the selected staff the data entry permissions necessary to set up disaster cases in EPPIC™.

All eligibility workers and supervisors already have regular EPPIC™ view and update permissions. However, the disaster function in EPPIC™ is hidden from everyone except central office EPPIC staff.

The central office EPPIC™ staff must manually enter information into the EPPIC™ system to authorize the disaster workers' permissions. The entries will allow the disaster workers to see and make entries into EPPIC™ to issue disaster benefits.

- ◆ Prepare a media release. The Department's public information officer must approve the content before releasing the statement to the public.
- ◆ Prepare signage to:
  - Guide applicants to the disaster sites, and
  - Inform applicants when and where they can apply to get regular Food Assistance benefits for the next month.
- ◆ Prepare fraud prevention posters to distribute to disaster sites. See [Comm. 387 and Comm. 387\(S\)](#) in 7-L-Appendix.

### **Spoiled Food Requests**

Immediately following the event, Food Assistance households will begin calling the local office or call center asking for a replacement of food spoiled in the disaster.

The time limit for a household to report the loss is normally 10 calendar days **from the date the household knows the food is spoiled** (not from the date of spoilage). In a flood, tornado, or other disaster that forces a household to leave its home, the loss may not be known until the household can return home.

A SPIRS note should be sent immediately to assist workers with this task.

NOTE: Spoiled food replacements are completed in ABC on the TD06, not in EPPIC™.

### **Anticipating Staffing Needs**

To the extent possible, identify in advance of a disaster the staff needed to operate a DFAP. Plan for the staff needed at:

- ◆ DFAP application and issuance sites
- ◆ Local offices to handle increased work
- ◆ The Income Maintenance Customer Service Center (IMCSC)
- ◆ The EBT customer service call center (XEROX)
- ◆ Central office

NOTE: Always notify XEROX in anticipation of a disaster. Provide a script for the EBT customer service representatives to use to handle calls regarding disaster assistance.

Prepare staff for the additional workload and emotional effort needed to operate the disaster program. Anticipate that staff also may need time away to prepare for or recover from the disaster personally. Not all local office staff in the disaster area may be available to handle normal and additional work.

In a large-scale emergency, you may consider the following suggestions for providing sufficient coverage for both regular Food Assistance ongoing work and the disaster site:

- ◆ Temporarily transfer work to unaffected areas of the state.
- ◆ Temporarily transfer staff from unaffected areas of the state.
- ◆ Seek help from volunteers, such as retired state workers, not-for-profit agencies, and the general public.
- ◆ Ask for help from neighboring states.
- ◆ Hire temporary staff. NOTE: Only persons hired under state merit system rules are allowed to determine eligibility. Employment records of temporary staff are subject to the same record retention rules as those of permanent staff.

### **Local Office Responsibilities**

It is important for each disaster location to use form 470-4906, [Field Disaster Food Assistance Checklist](#), in 7-L Appendix.

### **Supervisory Preparation for Disaster Program**

Supervisory staff needs to know DFAP policy and procedure to prepare for a disaster and for the disaster follow-up at the end of the program. See Comm. 388, *Disaster Food Assistance Issuance Handbook*, for samples of forms completed or issued during the application process.

- ◆ Be familiar with the DFAP rules, procedures, and documents.
  - Forms 470-4903 and 470-4903(S), *Statement of Loss of Income or Disaster-Related Expenses*, contain all required questions for **ongoing households** and space to determine eligibility and the amount of supplemental benefits. A perjury warning is on the form.

- Forms 470-4904 and 470-4904(S), *Application for Disaster Food Assistance*, contains all policy the issuance worker needs to determine eligibility for **new households**.

'Rights and Responsibilities' are plainly printed on the form. The last page of the form walks the worker through the steps and calculation of a household's eligibility determination.

- ◆ Review the DFAP Notice of Decisions (NOD). **Every NOD must be hand-issued.** Appeal rights are on forms 470-4072 and 470-4072(S), *Notice of Decision for Disaster Food Assistance*. A household can request an appeal verbally or in writing. If an applicant wants to appeal a decision:
  - An immediate supervisory review is required.
  - A supervisory review shall in no way interfere with the household's right to a fair hearing.

A household can withdraw its request for a fair hearing in writing or verbally. If withdrawn verbally, the withdrawal must be documented in the case record. Try to get written confirmation.

### **Department of Inspections and Appeals (DIA) DFAP Role**

It is important to be proactive against fraud during DFAP. DIA provides investigators at disaster locations when requested by central office.

DIA presence may help prevent people from applying for disaster assistance fraudulently. However, too strong of DIA presence may deter those who are there to apply legitimately.

Examples from previous disasters:

- ◆ A large county with dozens of people waiting to apply and be interviewed had the DIA investigators introduce themselves to the applicants, wear their badges openly, and help people complete applications and answer general questions in the waiting rooms. They were very visual and found that some people left immediately upon seeing them.
- ◆ A smaller county with a handful of applications had the investigator sitting discreetly off to the side, without their badge in sight, or in the back reviewing the applications after they were processed. If requested, they reviewed applications before processing.



The disaster site manager has the discretion on how visual and vocal DIA investigators are. Use their help in a way that is most appropriate for each office situation.

The disaster site manager should contact central office immediately when it becomes obvious that DIA presence is needed. This could be for a variety of reasons including:

- ◆ Large number of applicants at one specific office,
- ◆ Workers seeing trends in possible fraud applications,
- ◆ To investigate specific applications.

Central office will contact DIA and request an investigator be sent. If DIA indicates they cannot get to that office for the investigation within the seven day time limit, then the local office should process the application as is, but set it aside to be investigated when DIA arrives. DFAP benefits can be recouped if necessary.

Notify central office where the investigators are needed most. DIA investigators will be diverted to the requested location as soon as possible. The locations where DIA is needed often changes daily. Communication with central office is vital.

If an office receives an application believed to be fraudulent, but there is no DIA presence, you may hold the application until an investigation can be completed. However, disaster applicants must receive their benefits within seven days if eligible.

It is important to post fraud warning flyers at each disaster application site. (See [Comm. 387 and Comm. 387\(S\)](#) in 7-L Appendix.)

### **Preparing to Deploy the Disaster Program**

Brief the staff selected as disaster issuance workers. These **must** be state merit employees. NOTE: **Remember that no one who handles EBT Vault Cards can determine a household's eligibility for DFAP benefits. These duties must be kept separate.**

Provide the disaster issuance workers with:

- ◆ Printed or electronic copies of Comm. 388, *Disaster Food Assistance Issuance Handbook*. See 7-L-Appendix.
- ◆ Printed or electronic copies of all DFAP forms. See Comm. 388. If the site does not have printing capabilities, the forms will need to be printed elsewhere and provided to the workers.
- ◆ All DFAP training documents provided by central office. These include FAQs, Quick Reference Guides, and subsequent SPIRS announcements.

The application is the main tool for eligibility determination. The charts are meant to supplement the form to aid in eligibility determination. Review the forms and the chart with the eligibility workers.

## Processing DFAP Applications

### FAP vs. DFAP

<b>Eligibility Factor</b>	<b>FAP</b>	<b>DFAP</b>
Disaster status	N/A	One of the following: <ul style="list-style-type: none"> <li>◆ Damage to home or self-employment property</li> <li>◆ Disaster-related expenses</li> <li>◆ Income source disrupted</li> <li>◆ Inaccessible liquid resources</li> <li>◆ Food loss</li> </ul>
Identity of applicant	Verified	Verified
Residency	Verified	Disaster area
Household composition <b>new</b> households	As defined in <a href="#">7-A</a>	<ul style="list-style-type: none"> <li>◆ Persons living and eating together at the time of the disaster</li> <li>◆ Does <b>not</b> include members of a household with whom applicants are temporarily staying during the disaster</li> </ul>

Eligibility Factor	FAP	DFAP
Household composition <b>ongoing</b> households	As defined in <a href="#">7-A</a>	<p>The <i>Statement of Loss</i> form states: <i>If you receive regular Food Assistance benefits and list people on this disaster form that aren't on your regular benefits with you, they may be added to your regular Food Assistance case.</i></p> <p>Use prudent person to determine if persons listed on the DFAP <i>Statement of Loss</i> form should be added to the household's regular Food Assistance benefits once the disaster is finished.</p>
Interviews	As defined in <a href="#">7-B</a>	<p>New households are required to have an interview.</p> <p>Ongoing households <b>cannot</b> be required to have an interview.</p>
Foster care children	As defined in <a href="#">7-C</a>	<p><b>Ongoing</b> households can receive supplemental DFAP benefits for foster care children even if they don't normally receive regular Food Assistance benefits for them.</p> <p>The household does <b>not</b> have to include them in the regular FA household when DFAP is finished.</p>
Benefit amount	As defined in <a href="#">7-E</a>	Maximum allotment for household size.
Alien status	Citizenship and alien status are verified	Eligible. Citizenship and alien status are <b>not</b> applicable.
Students	As defined in <a href="#">7-1</a>	Eligible. Student status is <b>not</b> applicable.
Social security numbers	Denial of household member if not provided	Household is <b>not</b> required to provide.
Resources	If not categorically eligible, as defined in <a href="#">7-D</a>	<ul style="list-style-type: none"> <li>◆ No separate resource test</li> <li>◆ Only liquid resources are countable</li> <li>◆ Verify <b>if possible</b></li> </ul>

Eligibility Factor	FAP	DFAP
Income	<ul style="list-style-type: none"> <li>◆ As defined in <a href="#">7-E</a></li> <li>◆ Special provisions for elderly or disabled</li> <li>◆ Verified</li> </ul>	<ul style="list-style-type: none"> <li>◆ Only count <b>net</b> income (after all payroll withholdings) expected to be received <b>during</b> the disaster certification period</li> <li>◆ No special provisions for elderly or disabled</li> <li>◆ Verify <b>if possible</b></li> </ul>
Expenses	Deductions include: <ul style="list-style-type: none"> <li>◆ Standard</li> <li>◆ Earned income</li> <li>◆ Shelter</li> <li>◆ Childcare</li> <li>◆ Medical</li> <li>◆ Child support payments</li> </ul>	<ul style="list-style-type: none"> <li>◆ Allow disaster-related expenses that are not expected to be reimbursed <b>during</b> the 30-day disaster certification period</li> <li>◆ Maximum standard and shelter deductions are already incorporated into disaster eligibility standards</li> </ul>

**Household Eligibility Requirements**

**Adverse Effect**

The household must have suffered an adverse effect due to the disaster. Examples include:

- ◆ Food was lost due to disaster or spoiled due to power outage of four or more hours. The household’s home or self-employment business was damaged or destroyed.
- ◆ Income was lost or is inaccessible, including reduction or termination of income, or a delay in receipt of income for two weeks or more after the disaster.
- ◆ Liquid resources are inaccessible.
- ◆ Disaster-related expenses are not expected to be reimbursed within the disaster certification period.

### **Eligible Disaster-Related Expenses**

Eligible expenses may include the following plus any reasonable disaster-related expenses as determined by the Department:

- ◆ Food destroyed or spoiled (refrigerator, deep freeze, cupboards)
- ◆ Cost to protect property during disaster cleanup (wood, tarps, sandbags, sump pump, equipment rental)
- ◆ Cleanup costs (bleach, antibacterial cleaner, mops, shovels, equipment rental)
- ◆ Shelter expenses away from home (hotel, campground)
- ◆ Replace personal items (clothes, bedding, hygiene items, shoes, toys)
- ◆ Moving and storage costs (moving truck rental, storage rental)
- ◆ Vehicle repair or replacement
- ◆ Costs to repair or replace items for home or self-employment property (washer, dryer, beds, carpet, furnace, air conditioner, furniture, water heater, television, paint)
- ◆ Childcare because of the disaster
- ◆ Pet boarding
- ◆ Medical and funeral costs due to the disaster
- ◆ Other disaster-related expenses

### **Food Purchase**

The household must plan on purchasing food at some time during the disaster certification period to be eligible to receive DFAP benefits.

### **Income and Resource Test for New Households (Available Funds)**

Calculate eligibility by taking the:

- Total net (take-home) income received **during** the 30-day disaster certification period
- + Accessible liquid resources at the time of interview
- Eligible disaster-related expenses
- = Countable total

If the countable total is less than the disaster limit for their household size, they are eligible for DFAP benefits and will receive the maximum allotment for their household size.

Refer to the *Application for Disaster Assistance* for further details.

### **Residency**

The household must have lived in the disaster area during the disaster certification period dates provided by central office. Central office has the option to approve an exception for disaster residency to include those who worked, but do not live, in the disaster area during the disaster certification period. Central office will provide guidance if the exception is approved.

The household may be eligible if temporarily living outside of the disaster area, but their home was within Iowa at the time of the disaster. Verification of residency is preferred, but not required to obtain DFAP benefits.

### **Subsequent Applications for Regular Food Assistance**

Disaster and regular Food Assistance certification periods cannot overlap.

If a household who received DFAP benefits applies for regular Food Assistance, it cannot get benefits until the disaster certification period is completed. Provide a sign at disaster application processing sites to tell **new households** when and where they can apply to get regular Food Assistance for the next month.

Do not deny the regular Food Assistance program application. Hold it for processing so that the two certification periods do not overlap. Prorate the regular Food Assistance benefits from the date after the last day of the disaster certification period.

### **DHS Employee DFAP Applications**

Central office must receive a copy of every DFAP application that has a DHS employee included in the household.

It is important to set up protocol at each disaster site when a DFAP application is received with a DHS employee in the household. These applications need to be kept separate from the rest of the applications for disaster assistance.

One person at each disaster site must forward the name, case number, and social security number of the DHS employee applicant to the specified contact person at central office at the end of each working day.

### **Claims and Lost Benefits**

A claim must be established on any case found to have had benefits issued in error. Claims must be established **no later than six months after the close of the disaster certification period.**

Establish a claim according to the cause of the error: agency error, inadvertent household error, or intentional program violation (IPV) if founded through the IPV process.

Lost benefits must be provided immediately upon discovery or following a reversal of a denial or due to agency error. Central office staff will have to issue lost benefits in the EPPIC™ system when discovered after the close of a disaster because EPPIC™ system disaster permissions for county eligibility workers are revoked at the close of the disaster.

### **Reporting Disaster Issuance and Denials**

DFAP application approvals, DFAP supplemental issuances, and DFAP denials are always issued through direct EPPIC™ system entries. The EPPIC™ system automatically tabulates these issuances for daily federal reporting. Central office handles compiling those reports and submits a report to FNS each day, and at the end of the disaster certification period.

## **Operating in a Pandemic**

In the event of a human pandemic, areas of the state may be subjected to mandatory social distancing. Social distancing means that contact with the public is restricted, including limiting or prohibiting public gatherings. Nonessential businesses may be closed, nonessential workers may be told to stay home; businesses that remain open may limit business hours or how business will be conducted.

The impact of a human pandemic is unknown. However, generally there is some advance warning and preparation time. Many details for operation of the DFAP will need to be fleshed out at that time. The DFAP policies detailed above apply to pandemic or similar situations, with the exceptions as detailed in this section.

### **Limited Public Contact - Applications**

When public contact is limited, the state will implement a DFAP that allows households to file applications and to request disaster supplements without coming into a local office or applying in person.

Applications and statements of loss for disaster supplements will be filed by phone, email, regular mail, fax, and over the Internet. The Department may establish call centers to accept and process applications and requests for disaster supplements. Some workers may be assigned to work from home.

If in-person applications are taken, they will be taken at the sites where other emergency services are located. Emergency services will be located in open or semi-open areas such as hospital parking lots.

### **Interviews and Verifications**

Households filing phone applications will be interviewed by phone. The interview for households filing electronically may be held by phone, if possible, or waived entirely if the household cannot be reached by phone.

It will be necessary to process applications and requests for disaster supplements quickly, so interviews and verification of identity and residency must be accomplished quickly. If this cannot be done, the requirements will be waived and noted as such in the case record.



Verification of the applicant's identity and residency may be accomplished through the unusual means available to the Department such as driver's license look-up. Online queries such as a homeowner search on county tax assessors' websites or checking local phone books to see if the household's normal living address is listed may be used to verify the applicant's identity and residency. In some instances, it may be necessary to waive verification.

### **EBT Cards and Benefit Issuance**

DFAP benefits are issued exclusively through EPPIC™ system entries. The EPPIC™ system allows the user to issue a Vault Card or to mail a regular EBT card to the household.

Households who file electronically or by phone will receive a regular EBT card by mail. Vault Cards cannot be mailed. If regular mail service is not available, use of an alternate delivery method may be necessary. Mail service and mailing instructions will need to be provided at the time of the emergency.

In-person application sites will issue Vault Cards. It will be necessary to make an eligibility determination on site. If it is not possible to make the EPPIC™ system entries on site, the worker will need to tell the household when the application will be processed and to wait until that time to use the Vault Card.

Lack of Department personnel may mean that it is not feasible to make eligibility determinations on site. If so, applications will be taken but Vault Cards will not be issued. Applications will need to be processed off site and EBT cards mailed.

**Waivers to Consider Requesting (Pandemic)**

<b>Circumstance</b>	<b>Possible Waivers</b>
<p>A large area is anticipated to be affected or health and civic authorities anticipate quarantine.</p>	<p>A waiver to issue regular monthly benefits early to allow households to stock up on basic foods.</p> <p>A waiver for mass replacement of the current monthly allotment.</p> <p>A waiver to issue to all ongoing households an amount sufficient to allow stocking up on basic foods.</p> <p>A waiver to allow ongoing households to receive full disaster benefits rather than a disaster supplement. NOTE: Households will likely have spent their monthly benefits if the pandemic strikes after the issuance date.</p>
<p>The situation is estimated to continue for a lengthy period.                      (A pandemic outbreak is anticipated to last 6 to 8 weeks. Waves of community outbreaks could occur across the country, with each wave lasting 2 to 3 months.)</p>	<p>A waiver of the normal FNS-approved disaster period of 5 to 7 days to a sufficient length to cover the anticipated duration of the pandemic.</p>
<p>There are or likely to be restrictions on travel or a quarantine.</p>	<p>Waivers on the use of EBT, such as:</p> <ul style="list-style-type: none"> <li>◆ Allowing the PAN on an EBT card to be key-entered at a retailer location with the card not present.</li> <li>◆ Allowing telephone and Internet orders.</li> <li>◆ Allowing delivery charges to be paid for with Food Assistance if pick up is not allowed by authorities.</li> </ul>
<p>It is anticipated that the situation will seriously affect the ability of households in the affected area to provide care for themselves or others or to be able to cook.</p>	<p>A waiver for hot foods as an allowable Food Assistance purchase.</p>

### **DFAP Quality Control Review**

A random sample case review must be conducted within six months of the close of each DFAP. FNS may grant an extension if warranted. State Quality Control (QC) staff conducts the DFAP QC review.

The sample must consist of 0.5 percent of new DFAP cases, not ongoing cases. QC will review a maximum of 500 cases, and a minimum of 25 cases no matter how many DFAP cases were approved.

In addition to the random sample, 100 percent of all approved DHS employee cases must be reviewed. Ongoing cases that received disaster supplements are not subject to review, and are not to be included in the random sample.

The EPPIC™ system contains daily reports of all cases approved for DFAP benefits. The random sample must be drawn from the daily reports as these reports contain case numbers and county information. The disaster end reports do not contain this information.

Cases selected for review may not be dropped for any reason. Gather as much information as possible and report the information from the incomplete case reviews along with the completed reviews.

After QC staff reviews the selected case files, they will:

- ◆ Conduct an error analysis which will:
  - Break down information by geography and by type of household (employee or public cases).
  - Include error rates, the dollar issuance issued in error, and the number of cases in error.
- ◆ Determine what corrective action is needed to prevent future occurrences.

### **Post-Disaster QC Review**

A QC review of DFAP cases is different from a review of regular Food Assistance cases. There are fewer elements to review and less stringent review requirements. A different worksheet is used in the QC review process for DFAP cases.

The DFAP QC review is focused on identifying households who intentionally failed to report information known to them about their circumstances, such as residency, food loss, income sources, or loss of work.

In many situations, households are unable to predict what will occur during the DFAP certification period. The review is not intended to focus on households who simply were not able to project their circumstances accurately. Inability to accurately predict circumstances is not an intentional act.

For each sample case, the review must include:

- ◆ A review of the application.
- ◆ A check for duplicate participation.
- ◆ An interview with the household.
- ◆ Verification of the information on the application.
- ◆ Verification that all income sources were disclosed.
- ◆ A redetermination of the household's eligibility for Disaster Program benefits.
- ◆ A determination of whether a claim exists.
- ◆ Collection of any information the household provides about the level of service they received with the DFAP.

### **Participation Review**

DFAP cases exist only in the EPPIC™ system. When reviewing the case, it is necessary to check the ABC system to see if any member received regular Food Assistance benefits during the disaster certification period.

Also check EPPIC™ to see if any adult household member is found in the system. If an adult household member is found to have another disaster case, pull that case record to check for duplicate participation of the household members.

### **Client Interview**

The interview has two purposes. The interview is held to review the household's statements on the *Application for Disaster Food Assistance* and explore any inconsistencies found through data matching or other sources. The second purpose is to gather and document the household's reflections on the quality of the DFAP service the household received.

The interview can be held by telephone or face to face. Using available resources, make a reasonable attempt to contact the household to schedule the interview. If the household cannot be reached or does not attend the interview, review the case record and report the results.

### **Application Review**

Review the application and note any problems, such as missing or inconsistent information, lack of signature, etc. Redetermine the household's eligibility using the information provided on the application, and note the results.

Note any information the client gave on the client's place of employment at the time of the DFAP eligibility interview.

### **Disaster-Related Expenses**

Do **not** verify claimed disaster-related expenses. Households are not required to keep receipts for their disaster-related expenses and therefore will not likely be able to verify their expenses.

### **Food Loss**

If the household's only adverse affect from the disaster was food loss, confirm that the household's circumstances at the time of the disaster would likely have resulted in a food loss. If the household's residence was in an area that experienced a power outage of at least four hours, flooding, or an event that would have caused food loss, consider this factor verified.

Homeland Security maps of power outages, flooding, etc., can be used as a source of verification. The reviewer's personal knowledge of the disaster event may also be considered verification. In most cases, there will be no need to request additional verification from the household regarding a claim of food loss.

### **Verification of Income Sources**

Determine if the household reported all sources of income or income loss that was known to the household at the time of the DFAP eligibility interview.

Use normal verification sources to detect intentionally unreported income. Wage matches, Income and Eligibility Verification System (IEVS) matches, and any other information that is available at the time of the review may be used. Do not wait for wage data to become current to perform a wage match.

If a wage match shows employment before the disaster, contact the last known employer to see if the client was employed there during the disaster certification period. Discontinue attempts to verify the client's income if:

- ◆ The client was not employed at that business at the time of the disaster,
- ◆ The employer refuses to cooperate with the review, or
- ◆ Attempts to contact the household have been unsuccessful.

Only in very unusual circumstances would government payments be inaccessible. However, private sources of income such as alimony, direct child support, and contributions, may be delayed or unavailable.

If an employer states that the client should have had no reason to believe that the income would be interrupted, explore the client's rationale for anticipating an interruption in income during the household's interview.

If unreported income is discovered during the review, explore with the household during the interview why the household believed that income would not be available during the certification period.

- ◆ It is not an error if the household gave the best information available to it at the time. If it appears that the household gave its best prediction of household circumstances, accept the household's statement regarding anticipated income.
- ◆ It is an error only if the household intentionally hid income when applying for DFAP benefits.

### **Residency**

Verify that the household lived in the disaster area during the disaster certification period. Consider residency to be verified automatically if the client's address on the application is located in the disaster area.

There is no need to request further verification of residency from the household unless it is questionable that the household really did live at its stated address during the disaster certification period.

### **Eligibility Redetermination**

The QC reviewer will determine the correct DFAP eligibility and benefit level based on the:

- ◆ DFAP case review
- ◆ Interview with the household
- ◆ Verification from collateral contacts
- ◆ Any other information relevant to the review

The QC worksheet will be documented to show any under- or over-issuance for DFAP. Notify the local office if an error occurred so that adjustments can be made.

### **Claim Determinations**

If a DFAP over-issuance occurs, the local office will establish a claim on the Overpayment Recovery System (OPR) and notify the Division of Adult, Children and Family Services.

### **Quality of Service Summary**

QC will summarize any comments made by households during the review about the service they received from the DFAP. This summary will be included in the final program report to FNS.

### **Problem Analysis Review**

After QC staff reviews the selected case files, they will:

- ◆ Conduct an error analysis which will include:
  - A breakdown of error cases by:
    - Location
    - Type of household (DHS employee or public)
  - Nature and cause of the errors
  - Payment error rates with:
    - Dollar amount issued in error
    - Number of cases in error
  - Number of cases with established claims
  - Number of incomplete reviews
- ◆ Note any strengths or opportunities for improvement from the quality of service assessment
- ◆ Determine what corrective action is needed for program improvement

### **Final DFAP QC Report**

The final DFAP QC report should include:

- ◆ Results of the case review error analysis.
- ◆ Results of the problem analysis review.
- ◆ Major problems encountered during the operation of the DFAP.
- ◆ Interventions used to solve major problems during the operation of the DFAP.
- ◆ Information on any claims established, including dollar amount, number of claims, and whether agency or client error.

Compile and submit the report to FNS **within six months of the close of the** disaster certification period.



## **Central Office FNS Reports**

Central office is responsible for compiling and transmitting the following reports in a timely fashion.

### **Daily DFAP Report**

Central office should begin submitting reports to MPRO on the day after the first day DFAP is operated and continue submitting the reports until all applications are processed. If, in the first few days of program operation the state has not processed applications yet to report, still send a negative report to MPRO.

The Excel daily reporting template entitled *Publications – D-SNAP Daily Reporting Sheet for Submission of Daily Reports* is required to be used when submitting the daily reports.

If nothing different is specified in the memorandum approving the DFAP request, the daily report shall contain the following elements for:

- ◆ New households
  - Number of households approved
  - Number persons approved
  - Number households denied
  - Value of benefits approved
  - Average benefit per household
- ◆ Ongoing households
  - Number of households receiving supplements
  - Number of persons approved for supplements
  - Value of supplements approved
  - Average benefit per household

Do not complete the Replacements Approved section of the spreadsheet.

### **FNS-388**

The *Monthly Issuance Report* (FNS-388) shall reflect disaster issuance and participation figures, including replacement benefits.

### **Other Reports**

Other regularly submitted issuance and benefit inventory reports shall also reflect disaster issuance.

## **Post-Disaster FNS Reports**

### **FNS-292**

Within 45 days of the termination of a DFAP operation, central office shall submit the final disaster figures on the FNS-292, *Report of Food Stamp Benefit and Commodity Distribution for Disaster Relief*, in the Food Programs Reporting System (FPRS).

The FNS-292 should contain the following issuance data for DFAP operations:

- ◆ Total number of new households.
- ◆ Total number of new clients assisted.
- ◆ Number of ongoing clients issued supplements.
- ◆ Value of benefits issued: total of benefits issued to new households and supplements issued to ongoing households.

The FNS-292 report should **not** include the value of any replacements issued. The value of replacements should be reported on the FNS-388, *Monthly Issuance Report*.

### **Post-Disaster Report**

Central office shall compile and submit to MPRO a report containing the results of the comprehensive review and the individual reviews **within six months** of the close of each DFAP operation.

The report should describe the systems or methods employed and document any major problems encountered and the interventions used to solve those problems in:

- ◆ Certification systems
- ◆ Fraud control
- ◆ Issuance
- ◆ Public information and outreach
- ◆ Program accessibility
- ◆ Security