

October 18, 2018

ALL COUNTY LETTER (ACL) 18-125

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALFRESH PROGRAM SPECIALISTS  
ALL CalWORKs PROGRAM SPECIALISTS  
ALL CONSORTIA REPRESENTATIVES  
ALL QUALITY CONTROL PROGRAM COORDINATORS

SUBJECT: CALFRESH EMERGENCY RESPONSE HANDBOOK

REFERENCES: UNITED STATES DEPARTMENT OF AGRICULTURE, FOOD  
AND NUTRITION SERVICE (USDA FNS) DISASTER SNAP  
GUIDANCE; [ASSEMBLY BILL 607 \(CHAPTER 501, STATUTES  
OF 2017\)](#)

The purpose of this letter is to provide County Welfare Departments (CWDs) with detailed guidance related to Disaster CalFresh (D-CalFresh) and general CalFresh emergency response through the release of the CalFresh Emergency Response Handbook. This handbook provides information and policy guidance needed to successfully plan for and implement D-CalFresh when a Presidential Declaration with Individual Assistance (IA) has been granted. This handbook also provides guidance on CalFresh emergency response options available when a disaster strikes but D-CalFresh is not operational because there has not been, or will not be, a Presidential Declaration with IA.

California's unique climate and geography regularly exposes its population to disaster, such as earthquakes, wildfires, and widespread power outages. In response to the increased occurrence of disasters requiring food assistance, the California Department of Social Services' (CDSS) CalFresh and Nutrition Branch has developed the CalFresh Emergency Response Handbook to provide all CWDs with the necessary guidance to better serve residents in their county during times of disaster.

The handbook details emergency response options and covers the necessary steps for CWDs to execute when a disaster strikes while incorporating "lessons learned" and

“best practices” from previous D-CalFresh events and other emergency responses. The handbook clearly identifies the roles of all necessary entities involved during active emergency response efforts, including a D-CalFresh operation. It also serves as a valuable tool that CWDs can reference when they submit their annual disaster preparedness plans each federal fiscal year, now (Chapter 501, Statutes of 2017).

Over time, the handbook will be revised to include further policy guidance and resources, as well as to include additional best practices and lessons learned so that CWDs can plan for, and efficiently respond to, disasters in their counties.

The CalFresh Emergency Response Handbook, along with corresponding resources, can be located on the [CalFresh Disaster Resource page](http://www.cdss.ca.gov/inforesources/CalFresh/Disaster-CalFresh), found at: <http://www.cdss.ca.gov/inforesources/CalFresh/Disaster-CalFresh>.

This ACL, and other [CDSS Letters and Notices](http://www.cdss.ca.gov/inforesources/Letters-and-Notices), are available online at: <http://www.cdss.ca.gov/inforesources/Letters-and-Notices>.

If you have any questions regarding this letter, please contact the CalFresh Policy Bureau at (916) 651-8047.

Sincerely,

***Original Document Signed By:***

KIM JOHNSON  
Deputy Director  
Family Engagement and Empowerment Division

Attachment



# Emergency Response Handbook

cal  fresh  
BETTER FOOD FOR BETTER LIVING

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# GLOSSARY OF TERMS

Acronym	Term	Definition
<b>ACL</b>	All County Letter	
<b>AB</b>	Assembly Bill	
<b>CDSS</b>	California Department of Social Services	
<b>CBO</b>	Community Based Organization	
<b>CFR</b>	Code of Federal Regulation	
<b>CWD</b>	County Welfare Department	
<b>D-CalFresh</b>	Disaster CalFresh	
<b>DGIL</b>	Disaster Gross Income Limit	
<b>D-SNAP</b>	Disaster Supplemental Nutrition Assistance Program	
<b>EBT</b>	Electronic Benefit Transfer	
<b>EPPIC</b>	Electronic Payment Processing and Information Control	
<b>EFAP</b>	Emergency Food Assistance Program	
<b>FEMA</b>	Federal Emergency Management Agency	
<b>FNS</b>	Food and Nutrition Service	
<b>FDU</b>	Food Distribution Unit	
<b>FDPIR</b>	Food Distribution on Indian Reservations	



Acronym	Term	Definition
<b>IEVS</b>	Income Eligibility Verification System	
<b>IA</b>	Individual Assistance	
<b>IPV</b>	Intentional Program Violation	
<b>LEP</b>	Limited English Proficient	
<b>OES</b>	Office of Emergency Services	
<b>OSI</b>	Office of System Integration	
<b>PIN</b>	Personal Identification Number	
<b>USDA</b>	United States Department of Agriculture	
<b>QC</b>	Quality Control	
<b>RO</b>	Regional Office	
<b>SACHS</b>	Southern Area Consortium of Human Services	
<b>SNAP</b>	Supplemental Nutrition Assistance Program	

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# INTRODUCTION

The California Department of Social Services (CDSS) has developed the CalFresh Emergency Response Handbook to guide County Welfare Departments (CWDs) through the implementation of Disaster CalFresh (D-CalFresh) when a Presidential Declaration with Individual Assistance (IA) has been granted. This handbook also provides guidance on CalFresh emergency response options available when a disaster strikes but D-CalFresh is not operational because there has not been, or will not be, a Presidential Declaration with IA.

In short, when a Presidential Declaration with IA has been granted and D-CalFresh is operational, individuals and families living or working in the affected disaster area at the time of the disaster (whether previously participating in CalFresh or not), who meet specific eligibility criteria, can apply and potentially be approved to receive D-CalFresh benefits. Additionally, in the event that there is a disaster that has led to food loss, but no Presidential Declaration with IA has been granted, and D-CalFresh is not operational, this handbook will guide counties on how to issue replacement benefits on either an individual or automatic/mass basis.

The CalFresh Emergency Response Handbook clearly identifies the roles of all necessary entities involved when D-CalFresh is operational or not, and defines their respective responsibilities. It also describes D-CalFresh policy, incorporates lessons learned from previous D-CalFresh events, and contains tools to help CWDs plan for, and respond to a disaster.

The CalFresh Emergency Response Handbook should be referenced by each CWD when developing their county's annual D-CalFresh Plan.

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# **PART 1: NO DECLARATION WITH INDIVIDUAL ASSISTANCE (IA)**

The following information should be referenced when responding to a disaster in the event that there is no Presidential Declaration with IA, and therefore, D-CalFresh cannot be requested. The options outlined, which include issuance of individual and automatic/mass replacement benefits, may also be used in conjunction with D-CalFresh. Part 2 of this handbook, Declaration with Individual Assistance: D-CalFresh, discusses how these options can be incorporated into an emergency response when D-CalFresh is requested.

## **BENEFIT REPLACEMENT DUE TO FOOD LOSS**

When a disaster strikes, but there is no Presidential Declaration with IA, CWDs have options to address potential food loss. CWDs can issue replacement benefits on an individual or automatic/mass basis. (See below for more information on the Automatic/Mass Replacement Waiver.) In addition to replacement benefits, CWDs have the option of submitting a Timely Reporting Waiver, which gives households more time to report food loss on an individual basis. (See below for more information on the Timely Reporting Waiver.)

Both the Automatic/Mass Replacement and Timely Reporting Waivers should be submitted as soon as possible after a disaster strikes and there is potential food loss. Applying for either waiver early will not have an impact on a CWD's ability to consider other emergency response options, such as D-CalFresh, in the future. Early submission of the Automatic/Mass Replacement and Timely Reporting Waivers will ensure that households that have experienced food loss have access to additional benefits, and that CWD's lobbies and administrative operations are not unnecessarily burdened with individual requests for replacement benefits when staffing may be impacted as a result of the disaster.

Replacement benefits are authorized under federal Supplemental Nutrition Assistance Program (SNAP) regulations at Title 7 Code of Federal Regulation (CFR) 274.6(f). Only ongoing CalFresh households qualify to receive replacement benefits.

Please note, replacement benefits are always available by affidavit to CalFresh households any time they experience an adverse effect causing them to lose food purchased with their benefits. The replacement guidance in this handbook is specific to benefit replacement as a result of a disaster.

## **ISSUANCE OF INDIVIDUAL REPLACEMENT BENEFITS**

Households that request individual replacements via a [CF 303](#) Replacement Affidavit must:

- Have experienced a loss of food purchased with CalFresh benefits.
- Request the individual replacement by completing the CF 303 within 10 days of the disaster, unless the county has requested and been approved for a Timely Reporting Waiver.
- Request the individual replacement in person, by mail, or by telephone

Please note that when an individual replacement is requested by telephone, the CF 303 may be completed using electronic signature, if that option is available.

## **TIMELY REPORTING WAIVER**

This waiver extends the 10-day timeframe in which CalFresh households must report food loss in order to individually request replacement benefits. Typically, the waiver is requested to extend the 10-day timeframe to 30-days.

The CDSS and the CWD will work together to draft the Timely Reporting Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval. The waiver request should be submitted as soon as possible, but no later than 10 days from when the disaster that caused the food loss occurred.

The Timely Reporting Waiver should be considered a standard component of a CWD's disaster response because individual households may have experienced food loss of which the CWD is unaware, and the impact of the disaster may prevent these households from individually requesting replacement benefits within 10 days. The Timely Reporting Waiver request is most often submitted before the Automatic/Mass Replacement Waiver request. However, there are times when submitting both waivers simultaneously is possible.

A Timely Reporting Waiver request requires that the CWD justify the request by including documentation. The documentation must indicate the extent of the disaster and specify that the impact may prevent households from requesting replacement benefits within the normal 10-day timeframe.

## **ASSUMING 'FOOD LOSS' AS A RESULT OF A DISASTER**

Food loss must be assumed to issue replacement benefits on an automatic/mass basis. Food loss may be assumed in situations where the impact of a disaster is widespread, such as major flooding or extensive power outages. Power outages are a very common cause of food loss resulting from a disaster. To assume food loss due to power loss, a majority (50% of more) of residents in a given area must experience a power outage of four hours or more.

Most often, an area is defined as a ZIP code (see the section on *Utility Data for Automatic/Mass Replacement Waiver* for more information), but an area may encompass an entire county or other geographic zone. Regardless of whether using a county, other geographic zone, or single or multiple ZIP codes to define an area, the

majority of residents in the area must have experienced a power outage of four hours or more. Data to support the Automatic/Mass Replacement Waiver request must be obtained from the local utility company.

Other widespread impacts such as major flooding may suffice to assume food loss, but do not require the same level of documentation. Widespread impacts, such as those caused by major flooding, may provide sufficient evidence of potential food loss to allow the CWD to issue replacement benefits without requesting individual affidavits. Documentation of such impact may include flood maps, and reports issued by the local or state Office of Emergency Services (OES) or Sheriff, etc.

CWDs should work with CDSS staff to determine whether food loss can be assumed as a result of the disaster and what area, whether ZIP code based or otherwise, may be eligible for automatic/mass replacement.

## **DOCUMENTATION REQUIRED TO ASSUME FOOD LOSS**

When submitting an Automatic/Mass Replacement Waiver request for approval, CWDs are required to document widespread adverse effects as a result of the disaster that led to food loss. The most commonly used documentation is power outage data that indicates an extended power outage of four hours or more and affects the majority of residents in a specific area. As mentioned above, additional types of documentation may be accepted depending on the type of disaster and the area impacted.

When using power outage data to document assumed food loss, the data must be obtained directly from the utility company. In some cases, CDSS may be able to secure the required data at the state level. In other cases, the CWD may need to contact the local utility company directly. CWDs should coordinate with CDSS before making the request of the local utility company to avoid duplicating efforts.

If the CWD is contacting the local utility company directly, either by phone or in person, it is important to accurately explain the data request to the utility company. The following checklist can support a CWD in obtaining the required data in a timely manner.

### **Power Outage Data Request Checklist**

- Explain that you work for the county and are in need of specialized assistance.
- Explain that you need specific data, indicating extensive power outages, to provide assistance to disaster survivors who suffered food loss as a result of the outages.
- Explain that you are working on a tight timeframe that is federally mandated.
- Be specific about the data you need and double check that both parties are in agreement on what data is being requested.
  - You are requesting the following:

- A list of ZIP codes serviced by the utility company wherein a majority of households (50% or more) experienced a power outage of four hours or more (the utility may equate meters to households); and
  - Confirmation of the start and end date of the data pull. In other words, it is necessary that the timeframe in which the qualifying power outage occurred is included.
- To prevent the sharing of personally identifiable information, the utility may exempt from the ZIP code list any ZIP code with 15 households (or meters) or less.
  - Obtain the name of the person at the utility company who will be working on your case, as well as a direct line or extension, if available.
  - Ask for a case or reference number so that you can efficiently follow up.
  - Ask that, due to the circumstances, a status update be provided after one or two days. The requested data may take a utility company several days to prepare
  - Consider supplying the utility with follow-up information, such as the number of clients assisted and replacement benefits issued as a result of their assistance.

It can be challenging to obtain required documentation in post-disaster situations. Developing utility company contacts and lines of communication in advance will help ensure that CDSS and/or the CWD will be able to obtain information when needed. CDSS strongly recommends establishing relationships and developing contacts at one, or multiple, utility companies that service your county.

Once documentation has been secured, the CWD will work with CDSS to submit an Automatic/Mass Replacement Waiver request. The steps for doing so are described on the following page.

## **AUTOMATIC/MASS REPLACEMENT WAIVER**

As mentioned, this waiver allows for the replacement of a certain percentage of a household's benefit allotment (depending on the time of the month and the county's issuance cycle) without the need to submit individual requests.

The CDSS and the CWD will work together to draft the Automatic/Mass Replacement Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval. The Automatic/Mass Replacement Waiver request will most often be submitted as a follow-up to the Timely Reporting Waiver request. However, there are times when submitting both waivers simultaneously is possible.

An Automatic/Mass Replacement Waiver request requires that the CWD justify the request by including documentation indicating that food loss can be assumed due to widespread adverse effects of the disaster, such as major flooding or power loss, that impact a majority (50% or more) of residents in a given geographic area (e.g., ZIP code).

In addition to documentation, specific caseload data must also be secured. In some cases, CDSS may be able to secure the required data at the State level. In other cases, the CWD may need to contact their respective consortia directly. CWDs should coordinate with CDSS before making this request of the consortia to avoid duplicating efforts.

The following caseload data must be obtained for the geographic area:

1. Number of CalFresh households in affected area(s)
2. Number of CalFresh individuals in affected area(s)
3. Estimated amount of replacement benefits

Once the caseload data has been provided and CDSS and the CWD have completed the Automatic/Mass Replacement Waiver request, the request will be submitted by CDSS to FNS for approval. If approved, CDSS, the CWD, and their respective consortia, will work together to coordinate the automatic issuance of replacement benefits to CalFresh households in the geographic area.

**Tip:** An Automatic/Mass Replacement Waiver can be amended after it has been approved by FNS if the disaster impacts additional geographic areas. As with the original waiver request, an amendment requires documentation indicating that food loss can be assumed in the expanded geographic area.

## **ISSUANCE OF AUTOMATIC/MASS REPLACEMENT BENEFITS**

Replacement benefits can be issued automatically with an approved Automatic/Mass Replacement Waiver. The amount replaced on an automatic basis cannot exceed a household's normal monthly allotment.

The percentage of benefits replaced depends on a variety of factors, such as:

- The time of the month in which the disaster occurred and the CWD's issuance cycle.
- The type of food loss that likely occurred (perishable and/or non-perishable).

FNS will specify the percentage of benefits that will be replaced in their approval of a CWD's Automatic/Mass Replacement Waiver request.

Once the Automatic/Mass Replacement Waiver request has been approved, CWDs will work with CDSS and their respective consortia to schedule the issuance of automatic/mass replacement benefits. Most often, automatic/mass replacement benefits are issued via an overnight batch process. Only ongoing CalFresh households residing in the qualifying geographic area(s) at the time of the disaster are eligible to receive replacement benefits on an automatic/mass basis.

Please note that, if automatic/mass replacement benefits are approved on a ZIP code basis, individuals and families that are homeless will be excluded from the

automatic/mass issuance. This is because the CWD is unable to determine whether or not the homeless household was residing in the qualifying geographic area at the time of the disaster. Homeless households may always request replacement benefits on an individual basis if they have experienced food loss.

Lastly, households who request individual replacement benefits by means of a CF 303 Replacement Affidavit cannot be issued additional replacement benefits under the automatic/mass issuance. These households will also be excluded from the automatic/mass issuance.

The cost of replacement benefits, whether issued on an individual or automatic/mass basis, is a normal CalFresh cost. Therefore, replacement benefits will be reported on the FNS-388 *Monthly State Issuance and Participation Estimates Report*. Please note that CDSS completes the FNS-388 using data submitted by CWDs on the DFA 256 *Food Stamp Program Participation and Benefit Issuance Report*. CWDs should not include replacement benefits as a D-CalFresh cost.

## **PUBLIC INFORMATION AND OUTREACH WITHOUT A PRESIDENTIAL DECLARATION WITH IA**

CWDs should consider a public information and outreach strategy, even when no Presidential Declaration with IA has been made. CWDs may update their public facing website, social media accounts, and Interactive Voice Response systems with information about the availability of regular CalFresh benefits, replacement benefits for ongoing CalFresh households that have experienced food loss, and emergency food available at local food banks.

**Tip:** When issuing automatic/mass replacement benefits, automated outbound calls and text messages sent on the day of the issuance have proven particularly useful in informing households of the additional benefits that will be available to them. This strategy will also help reduce the volume of inquiry calls to the CWDs when households receive additional benefits on their Electronic Benefit Transfer (EBT) cards.

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## PART 2: DECLARATION WITH INDIVIDUAL ASSISTANCE: D-CALFRESH

The following information should be referenced while responding to a disaster when there is a Presidential Declaration with IA and D-CalFresh may be requested. D-CalFresh should be requested in conjunction with the options described in *Part 1, No Declaration with Individual Assistance*, of this handbook, which include benefit replacement and the Timely Reporting Waiver.

### ABOUT D-CALFRESH

An affected area must have received a Presidential Declaration with IA in order to request D-CalFresh. D-CalFresh provides temporary food assistance for households impacted by a natural or man-made disaster. The program provides temporary benefits to eligible disaster survivors while also facilitating the issuance of supplemental CalFresh benefits for ongoing households. To be eligible for D-CalFresh, a household must have lived or worked in the identified disaster area at the time of the disaster, been affected by the disaster, and meet certain D-CalFresh eligibility criteria.

#### WHY OPERATE D-CALFRESH?

D-CalFresh is designed for situations where a large number of households have disaster related expenses not considered by the regular program and where the need is so great that the vastly streamlined D-CalFresh certification process is warranted. Additionally, under the provisions of Assembly Bill (AB) 607 (Chapter 501, Statutes of 2017), all CWDs are required to request to operate D-CalFresh when there is a Presidential Declaration with IA for an affected area in the county, or for the entire county.

#### WHERE DOES IT HAPPEN?

An affected area must have received a Presidential Declaration of “Major Disaster” with IA in order to request to operate D-CalFresh.

#### WHEN DOES IT HAPPEN?

D-CalFresh timing varies with the unique circumstances of each disaster, but always begins after commercial channels of food distribution have been restored and individuals and families are able to purchase and prepare food at home. Before operating D-CalFresh, a CWD should ensure that proper public information, staffing, and other necessary resources are in place.

#### WHO DOES WHAT?

CDSS and the CWD share the responsibility of planning, requesting, and operating D-CalFresh. FNS approves requests to operate D-CalFresh and supports both CDSS

and the CWD's D-CalFresh efforts through policy guidance, training, and technical assistance.

#### *HOW MUCH IS THE D-CALFRESH ALLOTMENT?*

D-CalFresh provides a full month's allotment to households who may not normally qualify for, or participate in CalFresh. The D-CalFresh allotment for a household is equal to the maximum monthly allotment for the household size provided under regular CalFresh. D-CalFresh allotments are updated annually.

As part of D-CalFresh operation, CWDs may also supplement regular CalFresh benefits for ongoing households affected by the disaster to bring them up to the maximum allotment, for parity, with new D-CalFresh households. Supplements can be issued on an individual or automatic/mass basis.

#### *WHAT MAKES UP A D-CALFRESH HOUSEHOLD?*

The D-CalFresh household composition is established as of the date the disaster struck. A household includes those people living, purchasing, and preparing food together at the time of a disaster. D-CalFresh households do not include those people who are temporarily staying with the applicant due to the disaster.

### **AUTHORITY TO OPERATE A D-CALFRESH**

The Robert T. Stafford Disaster Relief and Emergency Assistance Act provides the Secretary of Agriculture with the authority to operate Disaster SNAP (D-SNAP; known as D-CalFresh in California) when affected areas have received a Presidential Declaration of Major Disaster with IA and when commercial channels of food distribution are available. The Food and Nutrition Act of 2008 provides the Secretary of Agriculture with the authority to establish temporary emergency standards of eligibility for households who are survivors of a disaster that disrupts commercial channels of food distribution, after those channels have been restored.

FNS has elected to approve the operation of D-SNAP under Stafford Act authority when affected areas have received a Presidential Declaration with IA. Receipt of an IA declaration is indicative of the need for assistance at the household level in the affected area. Using this measure helps FNS and their state partners target D-SNAP resources to the hardest hit areas likely to require intensive food assistance. Aligning D-SNAP with a Presidential Declaration with IA ensures that FNS can provide aid to affected households in a consistent manner.

Should an extraordinary situation occur that does not receive a Presidential Declaration with IA, yet merits some nutrition response beyond regular CalFresh, FNS can consider the use of the Food and Nutrition Act authority, but only after consulting with officials empowered to exercise the authority of the Stafford Act.

In addition to the aforementioned authority, please reference the following documents for additional information regarding D-SNAP:

- [USDA FNS Disaster SNAP Guidance](https://www.fns.usda.gov/disaster/d-snap-resources-state-agencies-and-partners): <https://www.fns.usda.gov/disaster/d-snap-resources-state-agencies-and-partners>
- California Manual of Policies and Procedures (MPP) Section [63-900](#) (CDSS is in the process of making technical changes to this section of the MPP)
- All County Letter (ACL) [08-30](#) and ACL [06-37](#)
- [CDSS Disaster CalFresh Guidance](http://www.cdss.ca.gov/inforesources/CalFresh/Disaster-CalFresh): <http://www.cdss.ca.gov/inforesources/CalFresh/Disaster-CalFresh>

## OTHER WAIVERS AVAILABLE UNDER A PRESIDENTIAL DECLARATION WITH IA

### HOT FOODS WAIVER

The Hot Foods Waiver allows households to purchase hot, prepared foods at FNS authorized retailers with their CalFresh benefits. The Hot Foods Waiver may be implemented in the disaster area, as well as in areas beyond those that received a Presidential Declaration with IA, if households that lived in the disaster area have been displaced or temporarily relocated to other parts of the State.

FNS notifies retailers of the Hot Foods Waiver approval via email, telephone calls, and text messages. A hot foods notice is posted on the FNS website, and FNS shares this notice with CDSS and retailer associations.

Under the provisions of AB 607, all CWDs are required to submit a Hot Foods Waiver when there is a Presidential Declaration with IA for an affected area in their county. CDSS and the CWDs (both those impacted by the disaster and those in the surrounding areas, if applicable) will work together to draft the Hot Foods Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval.

### EXPUNGEMENT OF D-CALFRESH BENEFITS WAIVER

CalFresh benefits are typically expunged after 365 days of inactivity post issuance. This waiver allows the State to expunge D-CalFresh benefits usually after 90 days of inactivity post issuance. CDSS and the CWD will work together to draft the Expungement of D-CalFresh Benefits Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval.

### EARLY ISSUANCE

This waiver allows a State agency to issue monthly benefits early, on a county-by-county or statewide basis. If applicable, CDSS and the CWD will work together to draft

the Early Issuance Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval.

## **STAND-IN PROCESS**

This waiver allows FNS to accept liability for up to a certain amount per transaction, per retailer, per client, per day. If a client has insufficient funds to cover his/her transaction, FNS will reimburse the store up to the designated dollar amount, once the store obtains authorization. This is a rare waiver and may only be approved in cases of extreme devastation when power is out and telephones are non-operational for a significant amount of time. If applicable, CDSS and the CWD will work together to draft the Stand-In Process Waiver request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval.

## **RELAXED PROCEDURES FOR KEY-ENTERED TRANSACTIONS**

Normally, for CalFresh transactions, the EBT card must be present for a key-entered transaction. This waiver allows for the client to purchase food without having the CalFresh EBT card available. The client needs to know the EBT card number and PIN. This is an extremely rare waiver and may only be approved in cases of extreme devastation. If applicable, CDSS and the CWD will work together to draft the Relaxed Procedures for Key-Entered Transactions request. Once complete, CDSS will submit the waiver request on behalf of the CWD to FNS for approval.

## **NON-STAGGERED BENEFITS**

States with staggered issuance schedules may choose to issue monthly benefits to households at one time, or on a non-staggered basis, as long as the time in between issuances does not exceed 40 days. This option allows the CWD to override staggered issuance of benefits in case of a disaster, in order to make them available in the client's EBT account earlier than normal. The CWD should consult with CDSS if interested in this option.

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## PART 3: D-CALFRESH PLANNING

### DISASTER LEVELS

In deciding how to address a disaster and to determine whether or not to move forward with a request to operate D-CalFresh, the first step is to determine the level of the disaster. Working with CDSS staff, determine if the disaster is a Level 1, Level 2, or Level 3. The disaster level will dictate the response that is warranted on behalf of the CWD.

#### LEVEL 1 – NO DECLARATION WITH IA

A disaster has occurred, but there is no disruption to the county's services. County sites are operational and unaffected structurally. For the most part, disaster survivors' usual access routes to service delivery are unaffected. EBT card issuance is not disrupted. CalFresh benefits can be issued at normal certification sites, and all operations are normal.

#### Level 1 – Response

- Utilize outreach partners in affected areas to identify and serve target populations or neighborhoods.
- [Request Timely Reporting Waiver](#).
- Issue individual replacement benefits due to food loss via the CF 303.
- [Request Automatic/Mass Replacement Waiver](#).

#### LEVEL 2 – DECLARATION WITH IA

A disaster has occurred that qualifies the county or region for a Presidential Declaration with IA. Disaster survivors' normal access routes to service delivery may be affected. Some county certification sites may be structurally damaged, and some automated systems may be disrupted. Only some normal certification sites are operational.

#### Level 2 – Response

- Utilize outreach partners in affected areas to identify and serve target populations or neighborhoods.
- [Request Timely Reporting Waiver](#).
- Issue individual replacement benefits due to food loss via the CF 303.
- [Request Automatic/Mass Replacement Waiver](#).
- Request Hot Foods Waiver.
- Request D-CalFresh, including request for mass/automatic supplements, if applicable.

### **Level 2 – Response**

- Consider implementing mutual aid, and request staff and technology support to address D-CalFresh and regular processing.
- If D-CalFresh is approved:
  - Request activation of D-CalFresh online application and system functionality.
  - Request activation of EBT System D-CalFresh functionality.
  - Set-up D-CalFresh application sites and prepare to address human comforts.
  - Prepare, train, and mobilize staff.
  - Inform and mobilize outreach partners.
  - Implement outreach plan, including media strategy.

### **LEVEL 3 – DECLARATION WITH IA; REGULAR BUSINESS OPERATION DISRUPTED**

A major disaster has occurred. The disaster qualifies for a Presidential Declaration with IA. All or most systems may be disrupted. EBT card issuance may be disrupted. Disaster survivors' normal access routes to service delivery are affected, and survivors may have little or no access to regular county certification sites. Regular county certification sites may be disrupted, non-operational, or non-existing. D-CalFresh benefits cannot be issued at some normal certification sites and operations, and access at some or all other sites may be affected.

### **Level 3 – Response**

- Utilize outreach partners in affected areas to identify and serve target populations or neighborhoods.
- Request Timely Reporting Waiver.
- Issue individual replacement benefits due to food loss via the CF 303.
- Request Automatic/Mass Replacement Waiver.
- Request Hot Foods Waiver.
- Request D-CalFresh, including request for automatic/mass supplements, if applicable.
- Implement mutual aid, and request staff and technology support to address D-CalFresh and regular processing.
- If D-CalFresh is approved:
  - Request activation of D-CalFresh online application and system functionality.
  - Request activation of EBT System D-CalFresh functionality.
  - Request additional EBT cards, including Disaster EBT cards.
  - Set-up D-CalFresh application sites and prepare to address human comforts.
  - Prepare, train, and mobilize staff to manually process and approve D-CalFresh applications.
  - Inform and mobilize outreach partners.

<b>LEVEL 3 – DECLARATION WITH IA; REGULAR BUSINESS OPERATION DISRUPTED</b>
○ Implement outreach plan, including media strategy.



## **ROLES AND RESPONSIBILITIES DURING D-CALFRESH OPERATIONS**

In addition to planning for a range of disaster levels, the CWD should be aware of the roles and responsibilities of each organization involved in D-CalFresh operations and general emergency response. The section below outlines the roles and responsibilities of several key partners and provides contact information when possible. This list is not exhaustive. Depending on the unique circumstances of a disaster, the partners required, as well as their roles and responsibilities, may change.

- Local CWD
- Local law enforcement agency
- Local fire department
- Local emergency responders
- Local utility companies
- Local media sources
- CDSS CalFresh Policy
- CDSS CalFresh Operations
- CDSS CalFresh Programs
- CDSS Emergency Food Assistance Program
- FNS
- Consortia
- Community Based Organizations
- Local Office of Emergency Services/Red Cross
- Public Health
- Public Housing
- Federal Emergency Management Agency (FEMA)
- Mutual aid region

When developing a D-CalFresh county plan, each CWD should also include local partners and contact information for each.

## THE ROLE OF THE LOCAL CWD

When D-CalFresh is operational, the CWD will be responsible for the following:

- Evaluating the need for other disaster waivers, extension requests, or other food programs.
- Reviewing the most current D-CalFresh County Plan.
- Providing local training to internal and external partners.
- Issuing press releases and coordinating public service announcements for local distribution.
- Providing staff to operate D-CalFresh at district offices, call centers, or D-CalFresh application sites.
- Selecting and securing D-CalFresh application sites, as well as ensuring human comforts at each site.
- Evaluating the need for assistance from neighboring counties (see *Cross-county Support and Mutual Aid* section for more information).
- Receiving and processing D-CalFresh applications.
- Issuing D-CalFresh benefits.
- Issuing supplemental benefits to ongoing CalFresh households.
- Providing immediate supervisory review of all denied D-CalFresh applications.
- Ordering additional EBT cards, including Disaster EBT cards if needed.
- Providing data for daily reports of D-CalFresh issuance totals to State.
- Maintaining communication with the State and FNS throughout operations.

When D-CalFresh is operational, key county staff include:

- Emergency Coordinator(s)
- First Responder Team Lead(s)
- Assistant Director(s)
- Regional Manager(s)
- SAWS Consotia Regional Managers(s)
- Deputy Director(s)
- Program Specialist(s)



## **THE ROLE OF THE LOCAL LAW ENFORCEMENT AGENCY**

Security is a concern in the event of a disaster. In very large disasters, crowds may disrupt disaster assistance efforts. If a situation escalates past the abilities of CWD security staff, police presence may be required to:

- Ensure peace and safety for customers and county staff.
- Assist with unruly crowds or dissatisfied customers.
- Assist customers with concerns not related to the issuance of benefits.

The CWD should have the telephone numbers of local law enforcement available and have designated those employees who have the authority to contact them. In the case of a major disaster, CWDs should connect with local law enforcement early and often, particularly if D-CalFresh operations will take place at a remote application site and a significant number of applicants are anticipated.

## **THE ROLE OF THE LOCAL FIRE DEPARTMENT**

Health and hazards can become a concern in the event of a disaster. The Fire Department may assist in the following ways:

- Determine if any hazardous substances are affecting the issuance sites.
- Provide medical assistance if needed.

The CWD should have the telephone numbers of the local fire department available and have designated those employees who have the authority to contact them.

## **THE ROLE OF LOCAL EMERGENCY RESPONDERS**

When D-CalFresh is operational, the CWD may need to work in partnership with a range of additional local emergency responders, including the local OES, public health, shelters, and Community Based Organizations (CBOs), each with their own responsibilities. When planning for a disaster, the CWD should identify local emergency response organizations and their specific roles in responding to a disaster. Relevant contact information should be included in the each CWD's D-CalFresh county plan.

## **THE ROLE OF CDSS CALFRESH POLICY**

When D-CalFresh is operational, CDSS CalFresh Policy will be responsible for the following:

- Assisting the CWD in submitting any additional waiver(s) or extension requests, or in implementing any other food programs.
- Providing policy training and/or policy resources as needed.

- Providing on-site policy support at remote application sites as needed.
- Assisting with the coordination of additional staff or technology support to operate D-CalFresh at district offices, call centers, or D-CalFresh application sites.
- Evaluating the need for assistance from neighboring counties. (Refer to the *Regional Planning – Mutual Aid* section for more information.);
- Providing daily reports of D-CalFresh issuance totals to FNS.
- Maintaining communication with CWDs and FNS throughout operation.
- Coordinating and leading daily conference calls between CWDs, FNS, consortia, the Office of System Integration (OSI) - EBT, CDSS Program Automation and Technology, and other applicable stakeholders.
- Providing the CDSS Executive Staff and the California Health and Human Services Agency (CHHSA) with a daily status report.

Please see below for key CDSS CalFresh Policy and Automation contacts:

Name	Title	Phone Number	E-mail
<b>Kim McCoy Wade</b>	CalFresh and Nutrition Branch, Chief	(916) 651-9915	<a href="mailto:KimMcCoy.Wade@dss.ca.gov">KimMcCoy.Wade@dss.ca.gov</a>
<b>Alexis Fernández</b>	CalFresh and Nutrition Branch, Policy Bureau, Chief	(916) 653-6162	<a href="mailto:Alexis.Fernandez@dss.ca.gov">Alexis.Fernandez@dss.ca.gov</a>
<b>Kyle Priess</b>	CalFresh and Nutrition Branch, Policy Bureau, Policy Unit Manager	(916) 651-6023	<a href="mailto:Kyle.Priess@dss.ca.gov">Kyle.Priess@dss.ca.gov</a>
<b>Jessica Lopez</b>	Program Technology and Automation Branch, Chief	(916) 651-6023	<a href="mailto:Jessica.Lopez@dss.ca.gov">Jessica.Lopez@dss.ca.gov</a>
<b>Raquel Givon</b>	Program Technology and Automation Branch, Program Integrity Bureau, Chief	(916) 654-1770	<a href="mailto:Raquel.givon@dss.ca.gov">Raquel.givon@dss.ca.gov</a>
<b>John Morton</b>	Program Technology and Automation Branch, EBT Unit Manager	(916) 657-3804	<a href="mailto:John.Morton@dss.ca.gov">John.Morton@dss.ca.gov</a>
<b>Joan Gifford</b>	OSI/EBT Operations	(916) 263-4163	<a href="mailto:Joan.Gifford@osi.ca.gov">Joan.Gifford@osi.ca.gov</a>
<b>Richard Terwilliger</b>	Research Services, Data Systems and Survey Design Bureau, Chief	(916) 653-1368	<a href="mailto:Richard.Terwilliger@dss.ca.gov">Richard.Terwilliger@dss.ca.gov</a>

## THE ROLE OF CDSS CALFRESH OPERATIONS

When D-CalFresh is operational, CDSS CalFresh Operations will be responsible for the following:

- Providing operations training and/or operations support as needed.
- Providing on-site operations support at remote application sites as needed.
- Attending daily conference calls.
- Conducting site visits in impacted counties as needed.
- Coordinating and completing Quality Control (QC) reviews.

Please see below for the key CDSS CalFresh Operations contact:

Name	Title	Phone Number	E-mail
<b>Tami Gutierrez</b>	CalFresh and Nutrition Branch, Operations Bureau, Chief	(916) 653-5420	<a href="mailto:Tami.Gutierrez@dss.ca.gov">Tami.Gutierrez@dss.ca.gov</a>

## THE ROLE OF CDSS CALFRESH PROGRAMS

When D-CalFresh is operational, CDSS CalFresh Programs will be responsible for the following:

- Implementing the D-CalFresh Outreach Plan, which includes:
  - Updating the CDSS D-CalFresh webpage.
  - Developing and distributing D-CalFresh outreach materials to affected counties and D-CalFresh community partners, including:
    - SNAP Education implementing agencies
    - Emergency Food Assistance Program (EFAP) providers
    - CBOs
    - Employment and Training or Community College partners
    - Immigration and Refugee groups (in coordination with the CDSS Immigration and Refugees Branch)
    - Women, Infant, and Children's Program centers (in coordination with the California Department of Public Health)
    - Local schools (in coordination with the California Department of Education)
  - Developing and distributing template press releases to affected counties.
  - Coordinating with CDSS' Public Information Officer to manage and issue statewide press releases and other media engagement.

Please see below for key CDSS CalFresh Programs contacts:

Name	Title	Phone Number	E-mail
<b>Brian Kaiser</b>	CalFresh and Nutrition Branch, Programs Bureau, Chief	(916) 657-3356	<a href="mailto:Brian.Kaiser@dss.ca.gov">Brian.Kaiser@dss.ca.gov</a>
<b>Jessica Cooper</b>	CalFresh and Nutrition Branch, Programs Bureau, Outreach Unit Manager	(916) 651-5243	<a href="mailto:Jessica.Cooper@dss.ca.gov">Jessica.Cooper@dss.ca.gov</a>

## THE ROLE OF CDSS EMERGENCY FOOD ASSISTANCE PROGRAM

The CDSS EFAP is responsible for administering the program at the state level and works with local EFAP providers to support individuals and families impacted by a disaster. The CDSS EFAP and local EFAP providers, with FNS approval, can provide individuals and families who remain in their homes with emergency food assistance through a Household Disaster Feeding Program. This program provides additional commodity foods to EFAP providers to supplement the nutritional needs of the community. Commodity foods may be provided without an approval to operate D-CalFresh.

When D-CalFresh is operational, CDSS EFAP will be responsible for the following:

- Acquiring and analyzing information provided by local EFAP providers in the disaster impacted area(s).
- Coordinating appropriate disaster assistance and distribution of food or funds, as needed.
- Establishing the Household Disaster Feeding Program using USDA Foods, as needed.
- Supporting necessary documentation and follow-up as it pertains to the close out of the Household Disaster Feeding Program.

**Please note:** households that receive food through the Household Disaster Feeding Program at their local EFAP provider are not eligible to receive D-CalFresh benefits.

Please see below for key CDSS EFAP contacts:

Name	Title	Phone Number	E-mail
<b>Brian Kaiser</b>	CalFresh and Nutrition Branch, Programs Bureau, Chief	(916) 657-3356	<a href="mailto:Brian.Kaiser@dss.ca.gov">Brian.Kaiser@dss.ca.gov</a>
<b>Don Williams</b>	CalFresh and Nutrition Branch, Programs Bureau, Emergency Food Assistance Program Manager	(916) 229-3336	<a href="mailto:Don.Williams@dss.ca.gov">Don.Williams@dss.ca.gov</a>

## THE ROLE OF FNS

FNS reviews, approves, or denies requests to operate D-CalFresh. In addition, FNS is responsible for the following:

- Providing policy and operations guidance.
- Providing on-site support at remote application sites, as needed.
- Approving all media and outreach materials related to the operation of D-CalFresh.
- Providing USDA Foods for shelters and other mass feeding sites.
- Providing USDA Foods for distribution directly to households in need in certain limited circumstances.
- Providing funding for 100 percent of D-CalFresh benefits and 50 percent of State administrative costs.
- Liaising with the FEMA.

## MUTUAL AID REGION

When disaster strikes, and evacuations are in place, mandatory or not, individuals and families will often cross county lines to seek out shelter with friends and family or others. As a result, households may apply for D-CalFresh benefits in counties outside of their counties of permanent residence. Additionally, depending on the extent of the disaster impact, county operations may be disrupted in the disaster area and additional support from regional, or statewide CWDs will be needed.

Coordinating with regional counties will ensure that D-CalFresh benefits are readily available to disaster impacted households. Additionally, under the provisions of AB 607, all counties are required to submit a D-CalFresh county plan annually, which includes a mutual aid region made up of two or more counties.

It is important to have a plan in place with counties in your region (bordering or not) to address mutual aid needs and support emergency response activities between CWDs. A good example is the disaster preparedness mutual aid plan that the Southern Area Consortium of Human Services (SACHS) has developed.

Among the SACHS counties, each county director has agreed to coordinate emergency preparedness and response efforts before, during, and in the wake of a disaster. A mutual aid plan is co-developed between counties and includes information such as primary contacts, roles and responsibilities, and staff support plans between counties, with the intention of establishing a foundation for coordinated emergency response efforts.

When selecting a mutual aid region, CWDs are encouraged to consider partnering with CWDs in the immediate vicinity, and further away, in case the disaster impact is widespread and crosses into neighboring counties. Additionally, CWDs should partner with at least one county in the same consortia, so that county may access the disaster impacted county's case records, if needed, and support D-CalFresh operations and regular business needs.

Each disaster and disaster response are different; with that said, robust planning with a regional partner is essential and will help ensure that CWDs are prepared to respond to a range of disaster scenarios. Possible mutual aid that can be offered by non-impacted counties, may include, but is not limited to:

- Providing remote or on-site call center support.
- Providing on-site eligibility staff support. Eligibility staff from non-impacted counties may process new D-CalFresh applications or support timely maintenance of the ongoing CalFresh caseload.
- Dedicating eligibility staff to assist displaced households with D-CalFresh application, including:
  - Conducting required interviews remotely.
  - Collecting verification/documentation remotely and sending it to the impacted county.
  - Printing EBT cards with D-CalFresh benefits remotely.
- Dedicating eligibility staff to assist displaced ongoing households with issuance of supplements.
- Printing replacement EBT cards for displaced ongoing households.

## PRE-DISASTER TRAINING

In addition to the development of a robust D-CalFresh County Plan, advance preparations, including staff training, will facilitate an efficient and effective D-CalFresh operation and emergency response. CWDs should provide staff with introductory and ongoing training on general topics, such as D-CalFresh eligibility, application, and issuance procedures. CWDs should also provide an overview of their broad emergency response plans.

Under the provisions of AB 607, CDSS will offer an annual D-CalFresh training and will maintain training resources and other materials on its website.

**Tip:** CWDs that have implemented D-CalFresh recommend providing all staff an introduction to D-CalFresh, including policy basics, before implementation. A refresher course leading up to implementation for those staff members that have been previously trained on the topic has also proven helpful.

Training sessions held prior to the start of D-CalFresh operations should include information specific to the disaster and may differ depending on the disaster response role of each staff member being trained. Training topics for a CWD's pre-disaster training may include the following:

- Overview of the D-CalFresh certification process.
- Roles and responsibilities for each person.
- Eligibility policy, including eligibility criteria, eligibility calculations, benefit period identification, and deductible disaster-related expenses.
- Verification requirements and acceptable documentation and procedures for handling questionable applications.
- Application forms and client notices.
- Issuance of benefits, including procedures for when the application site is at an alternative facility.
- Access to services for people with disabilities and Limited English Proficiency (LEP).
- Fraud prevention.
- Daily reporting procedures.
- Roles of outreach partners.
- Self-care.

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# **PART 4: D-CALFRESH POLICY**

## **KEY CONCEPTS**

### **ALLOTMENT**

D-CalFresh provides a full month's benefit allotment to households that may not normally qualify or participate in CalFresh. The allotment for a household is equal to the maximum monthly allotment for the household size provided under regular CalFresh. D-CalFresh allotments are updated annually and released via an All County Information Notice (ACIN).

### **HOUSEHOLD COMPOSITION**

Household composition is established as of the date the disaster struck as specified in the Presidential Declaration with IA. A household includes people who are living together and who are purchasing and preparing food together at the time of the disaster. A D-CalFresh household does not include those people with whom applicants are temporarily staying with due to the disaster.

Please note, household members excluded from the CalFresh household as of the date the disaster struck may be eligible for D-CalFresh. See the section on previously excluded household members for more information.

### **APPLICATION PERIOD**

FNS generally approves an initial application period of up to seven days. CWDs may opt to use some or all of the seven days. The CWD should inform CDSS, as part of the D-CalFresh request, if applications will be accepted outside of normal business hours, such as on Saturdays or Sundays.

The CWD may only accept D-CalFresh applications from new households and requests for supplements from ongoing households during the D-CalFresh application period.

The CWD should not begin accepting applications until public information and outreach has begun, staff have been trained, resources are in place (including adequate application sites and human comforts) and systems are ready to begin D-CalFresh processing and issuance.

CWDs that need to change the application period dates from those in their approved D-CalFresh request must seek FNS permission to do so. In limited circumstances, if demand for D-CalFresh benefits among the general community or specific groups/areas remains significant, FNS may consider requests to extend the application period beyond seven days and may do so for the whole area or a sub-area of the original approval.



## **BENEFIT PERIOD**

The benefit period is critical to determining household eligibility. It is the period during which disaster-related expenses may be counted and incorporates the start date used to determine household composition. Only income, resources, and expenses during the benefit period are considered in determining D-CalFresh eligibility. The benefit period approved by FNS for each D-CalFresh operation is 30 days, except in extraordinary circumstances.

The benefit period begins on the date of the disaster or the date of any mandatory evacuation preceding the disaster. This date is generally the first day of the “Incident Period” provided by the Presidential Declaration. In some instances, CWDs may deem it appropriate to select a date later than the first day of the incident period because of when the disaster struck a particular area. CWDs considering this option should discuss the appropriate start date of the benefit period with CDSS. Basic D-CalFresh Eligibility

To be eligible for D-CalFresh, a household must first meet basic criteria, including:

- Resided or worked in the disaster area.
- Purchased or planning to purchase food during the benefit period.
- Experienced an adverse effect due to the disaster.

## **BENEFIT MONTH**

The D-CalFresh benefit month is established as of the date the disaster struck as specified in the Presidential Declaration with IA. For example, if the disaster start date falls in July, D-CalFresh benefits will be issued as July benefits.

## **RESIDENCY**

The household must have lived or worked in the disaster area at the time of the disaster.

## **PURCHASED FOOD**

The household must plan on purchasing food during the disaster benefit period or have purchased food during that time, if the benefit period has passed. This will likely apply to the majority of households, except after very large disasters where households would remain in shelters and be served through congregate feeding throughout the benefit period.

## ADVERSE EFFECTS

Disaster-related adverse effects fall into three categories: loss of income, inaccessible resources, and disaster expenses. The household must have experienced at least one of the following adverse effects in order to be eligible:

- *Lost or Inaccessible Income*: Lost or inaccessible income includes reduction or termination of income, or a delay in receipt of income during the benefit period due to the disaster.
- *Inaccessible Liquid Resources*: Inaccessible liquid resources during the benefit period. (An example of this is banks being closed due to the disaster.) Please note that this is an infrequent occurrence, as households can usually access their resources via online banking or Automated Teller Machines, even if bank branches are closed in the affected area.
- *Deductible Disaster-related Expenses*: Out of pocket disaster-related expenses paid (not just incurred) by the household that are not expected to be reimbursed during the 30-day benefit period. This can include damage to, or destruction of, the household's home or self-employment business.

## PREVIOUSLY EXCLUDED HOUSEHOLD MEMBERS

Regular CalFresh restricted eligibility categories which include, but are not limited to, student status, citizenship status, Intentional Program Violation (IPV), work registration, ABAWD status. These restrictions do not apply when determining D-CalFresh eligibility. Therefore, previously excluded household members may be eligible for D-CalFresh, so long as all other eligibility criteria have been met. Previously excluded household members must apply for D-CalFresh as a household separate and apart from the ongoing CalFresh household, which may be eligible for a supplemental benefit, if it is not already at the maximum allotment for its household size.

If an excluded household member's income has been prorated and applied to the ongoing CalFresh household, steps may be taken to prorate the previously excluded household member's income for the purposes of determining D-CalFresh eligibility. See the section on proration of income for more details.

## D-CALFRESH ELIGIBILITY AND PARTICIPATION IN OTHER FNS PROGRAMS

A household is not eligible for D-CalFresh if it is already being served by the disaster household distribution of USDA Foods, which is separately authorized under disaster regulations. This disaster household distribution program is distinct from the normally operating Food Distribution on Indian Reservations (FDPIR) and EFAP as described below:

- *FDPIR*: If a household received regular FDPIR benefits after the disaster occurred, it would not be entitled to receive D-CalFresh in the same month.

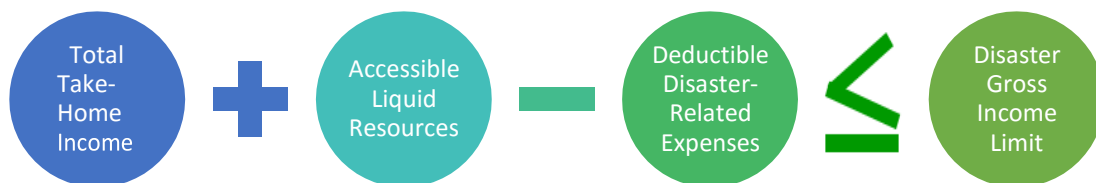
FDPIR benefits received by a household prior to the date the disaster struck should not be considered in determining a household's eligibility for D-CalFresh, since any benefits on hand at the time of the disaster were likely destroyed.

- EFAP: Households may participate in both EFAP and D-CalFresh (or regular CalFresh) in the same month; however, if a EFAP site offers an FNS approved disaster household distribution of USDA Foods, a household may not simultaneously receive D-CalFresh benefits and a disaster household food package.

## DISASTER GROSS INCOME LIMIT

Unlike regular CalFresh, which includes a separate test for income and resources, D-CalFresh groups income and resources together under one test. The household's take-home income received (or expected to be received) during the benefit period, plus its accessible liquid resources, minus disaster related expenses (paid or anticipated to be paid out of pocket during the benefit period) shall not exceed the Disaster Gross Income Limit (DGIL). In calculating the household's DGIL, care must be taken to avoid double counting of income and resources. Resources are determined on the first day of the benefit period. Anything received during the remainder of the benefit period is counted as income.

Figure 4.1 D-CalFresh Income and Resource Test



CDSS issues an annual Disaster CalFresh ACIN with the DGIL for the year.

### Disaster Gross Income Key Terms

- **Income**: the total take-home pay of household members. This includes:
  - Wages a household actually received after all payroll withholdings
  - Public assistance payments or other unearned income
  - Net self-employment income
- **Accessible Liquid Resources**: Accessible liquid resources include cash on hand and funds in accessible checking and savings accounts on the first day of the benefit period. It does not include:
  - Retirement accounts
  - Disaster insurance payments
  - Disaster assistance received or expected to be received during the benefit period
  - Payment from Federal, state, or local government agencies, or from disaster assistance organizations

- *Inaccessible Liquid Resources:* Includes otherwise liquid resources that are inaccessible for a substantial portion of the benefit period. This also includes receipt of income that has been delayed for a substantial portion of the benefit period due to the disaster.
- *Deductible Disaster Related Expenses:* Includes expenses that the household has paid or expects to pay out-of-pocket during the disaster benefit period. Please note that, if a household has received or anticipates to receive reimbursement for these expenses during the disaster period, only the net expense is deductible. In addition, expenses which are incurred, but not paid during the benefit period, such as those paid by credit card if the bill is due after the benefit period ends, are not considered out-of-pocket and are not deductible.

Eligible expenses may include, but are not limited to, the following, plus any reasonable disaster-related expenses as determined by the CWD:

- Home or business repairs
- Temporary shelter expenses
- Evacuation expenses
- Home/business property protection
- Medical expenses due to personal injury
- Disaster-related funeral expenses
- Disaster-related pet boarding fees
- Expenses related to replacing personal and household items, such as clothing, appliances, tools, and educational materials
- Fuel for primary heating source
- Clean-up item expenses
- Disaster-damaged vehicle expenses
- Storage expenses

Food lost or spoiled due to the disaster, or extended power outage, may also be considered a disaster expense if “food loss alone” has been included as a criterion in the D-CalFresh approval.

## **INCOME PRORATION**

When determining whether a D-CalFresh household’s income is under the DGIL, the CWD should prorate income, if applicable. Income proration only applies if the D-CalFresh household is comprised of previously excluded household members whose income had been prorated to determine the eligibility of the ongoing CalFresh household.

For example, a previously excluded father's income was prorated in the past to determine the eligibility of the ongoing CalFresh household, which includes the mother and two children. The father's income may be prorated to determine his eligibility for D-CalFresh as a household of one. The ongoing CalFresh household, the mother and two children, may be eligible for a supplemental benefit, if it is not already at the maximum allotment for its household size of three. D-CalFresh proration allows a household's income to be distributed across the D-CalFresh household and ongoing CalFresh household, if both exist during the benefit period.

## VERIFICATION REQUIREMENTS FOR D-CALFRESH

Verification rules are eased during a disaster to reduce administrative burdens and to reflect the reality that households and eligibility workers may not have access to the usual verification sources. Verification requirements for D-CalFresh are three-tiered:

- Identity must be verified.
- Residency and loss/inaccessibility of income or liquid resources should be verified where possible.
- Household composition and food loss can be verified if questionable.

Each disaster is unique, and the availability of verifications will likely vary depending on the circumstances. For example, in a disaster where strong winds caused extended power outages, households would likely be able to provide proof of residency, while households that lost their homes due to fires or hurricanes may not be able to provide documentation. When planning for D-CalFresh operations, preparing public information, and conducting staff training, CWDs should consider the types of verification (such as power outage maps, data matches, etc.) that may be available to the county, and to the household for a given incident. CWDs should also maximize electronic verifications, if available, to assist the household in gathering required documentation.

Please see the below table for detailed D-CalFresh verification requirements:

Applicant Information	Status	How to Verify
<b>Identity</b>	Mandatory for applicant	<ul style="list-style-type: none"> <li>• Photo ID</li> <li>• Two documents that verify identity and residency</li> <li>• Signed affidavit from a collateral contact attesting to the identity of the applicant, where other sources of identity are not available</li> </ul>

Applicant Information	Status	How to Verify
<b>Residency</b>	When possible and practicable	<ul style="list-style-type: none"> <li>Utility bills, tax bills, insurance policies, driver's licenses, other ID with address, bills or other documents that establish the applicant's home or work address</li> </ul>
<b>Household composition</b>	If questionable	<ul style="list-style-type: none"> <li>After taking the application, the eligibility worker can ask the applicant to orally list the names, ages, and birthdays of all household members.</li> </ul>
<b>Loss or inaccessibility of liquid resources or of income</b>	When possible	<ul style="list-style-type: none"> <li>Obtain a list of banks/ATMs that were closed due to the disaster and compare with damage maps.</li> <li>Check with the State Banking Commission.</li> <li>Confirm that the applicant's place of work was located within the most seriously damaged area.</li> </ul>
<b>Food loss</b>	If questionable	<ul style="list-style-type: none"> <li>Use maps or lists to verify that applicant lives within an area affected by power outage, flooding, evacuation, etc.</li> <li>Confirm with the power company.</li> </ul>

## DIRECT CERTIFICATION AND D-CALFRESH

Student eligibility for free meals is determined by application or direct certification. Direct certification is the process under which Local Education Agencies certify children who are members of households receiving assistance, such as CalFresh, as eligible for free school meals without further application, eliminating the need for paper

applications. CWDs are reminded that children who are members of D-CalFresh households are categorically eligible for free school meals and will be included in the State's direct certification process and should also be included in local direct certification data matches, if applicable.

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# **PART 5: REQUESTING D-CALFRESH**

## **DECISIONS TO BE MADE PRIOR TO THE REQUEST**

CWDs must make a number of decisions before drafting and submitting a D-CalFresh request. The following items will be discussed and considered with CDSS in the days leading up to the D-CalFresh request.

### **APPLICATION PERIOD**

The CWD must determine the desired application period. FNS generally approves an initial application period of up to seven days. CWDs may opt to use some or all of the seven days at their discretion. The application period may be made up of seven consecutive or non-consecutive days and may or may not include weekends. If additional days are needed, CWDs will work with CDSS to submit an amendment to the D-CalFresh request for FNS approval.

### **BENEFIT PERIOD**

The benefit period is the 30-day timeframe in which household income, resources, and disaster-related expenses are evaluated. The date the disaster struck should generally be used as the first date of the benefit period, in order to ensure that all disaster-related expenses can be captured within it. Household composition for D-CalFresh purposes is also established on the first day of the benefit period.

### **SUPPLEMENTS**

Supplements are an essential component of the disaster response, bringing ongoing CalFresh households affected by the disaster up to the maximum allotment for their household size. The request to issue supplements, paired with the supporting justification, should be included in the D-CalFresh request whenever possible.

For a given disaster, the CWD must also decide if it is appropriate to issue supplemental benefits on an individual basis, or automatically to all households in a designated area. Automatic/mass supplement issuance can help the CWD quickly and efficiently meet the needs of ongoing households, while freeing up staff and resources to assist the population of new D-CalFresh applicants.

CWDs must include their plan to issue automatic/mass supplements in their D-CalFresh request and must be able to effectively target the benefits to geographic areas that were heavily impacted by the disaster. The most common evidence of heavy impact is mandatory evacuation or extensive power loss. Mandatory evacuation maps and power outage data provided by the local utility company will need to be included in the D-CalFresh request as evidence.



It is important to note that automatic supplements need not be issued only at the county level. For example, if the data shows that a given ZIP code within a declared disaster area was most heavily affected, automatic/mass supplements can be targeted to those ZIP codes, and individual supplements can be made available to the rest of the county.

## **FOOD LOSS**

The loss of food due to a disaster can have a profound impact on vulnerable households. Households already known to be most in need – ongoing CalFresh households – can always request the replacement of lost food that was purchased with their CalFresh benefits. With FNS approval, CWDs may also allow new households whose only adverse effect was food loss to qualify for D-CalFresh, if they are otherwise eligible. If a county is interested in using food loss alone as an adverse effect, it must include this in the D-CalFresh request to FNS.

## **APPLICATION SITES**

For each disaster, the CWD must determine the exact number, location, and hours of operation for each application site. In small-scale disasters, CWDs may use the local office as the D-CalFresh application site. When the CWD predicts a large number of applications, or when local offices have sustained damage, CDSS strongly recommends the selection of an alternative site. Some commonly used alternative sites, include:

- Local Assistance Centers
- Schools
- Libraries
- Mobile Vans
- Auditoriums
- Parks

Please note, an extraordinary disaster may require extraordinary application sites. States that have implemented D-CalFresh on a larger scale after major natural disasters, such as hurricanes, have secured locations such as stadiums to accept tens of thousands of applications. These extraordinary circumstances require extensive planning and support. In the case of such a disaster, CWDs will work closely with CDSS and FNS to secure adequate operational support.

## **DRAFTING THE REQUEST**

The request should include thorough explanations for the components listed below. Well documented requests can be considered and approved more quickly, minimizing the need for follow-up and revisions. CDSS will work with the disaster impacted CWD to draft the request and provide technical assistance, as needed. Depending on the

disaster, some of the request components may be addressed by attaching an up-to-date D-CalFresh County Plan to the D-CalFresh request.

## **COMPONENTS OF THE D-CALFRESH REQUEST**

- *Disaster.* Describe the incident – what, when, where.
- *Area.* Note the geographic area included in the declaration and explain any difference between that area and the area in which D-CalFresh operation has been requested.
- *Application Period.* Give the start and end dates of the application period. If it will be staggered, give dates for each county/area.
- *Benefit Period.* Note the start and end date of the 30-day period. The start of the benefit period should generally match the first day of the “incident period” or the disaster declaration. If it does not, explain the reason for the difference.
- *Application Type.* Include information regarding the types of D-CalFresh applications that will be accepted: paper only or paper and online.
- *Eligibility Policy.* Include information on any options the CWD has chosen.
- *Ongoing Households.* Will supplements be automatic/mass or individual, or both? If automatic/mass, describe who is eligible and include supporting data. Also indicate an estimate of the value of issuance for automatic/mass supplements.
- *Anticipated Number of Applicants.* Estimate the number of anticipated D-CalFresh applicants, the number of ongoing households to be served, and an explanation of how both estimates were derived.
- *EBT.* Describe issuance procedures, the number of cards on hand, and plans for requesting, receiving, and distributing additional cards as needed.
- *Logistics.* Describe application sites, as well as plans for publicity and security/crowd control. Address potential access issues for the elderly and persons with disabilities.
- *Staffing.* Include plans for utilizing staff from other program areas or counties. Indicate the number of staff available and how staff/supervisors will be distributed among the application sites.
- *Public Information and Outreach.* Describe how program information will be disseminated to the public. List partner organizations involved and describe the responsibilities of each.
- *Duplicate Participation.* Indicate how/when checks will be conducted and include information on any special circumstances.
- *Employee Applications.* Describe procedures for identifying and handling applications submitted by CWD employees.

- *Additional Information.* Include supporting documentation, such as draft press releases, the declaration with IA, maps of the disaster area, evacuation maps, power outage data, etc.

Note: Sample requests can be provided to CWDs upon request.

D-CalFresh requests may be amended after they have been approved by FNS. Amendments may address operational changes, such as an extension to the application period or the addition of application sites. If an amendment is necessary, the CWD should work with CDSS, who will submit the amendment to FNS for approval.

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# PART 6: OPERATING D-CALFRESH

## PUBLIC INFORMATION AND OUTREACH

CWDs should create a public information plan to ensure that accurate and clear information reaches disaster-affected populations quickly, including those that are Limited English Proficient (LEP). In creating such a plan, CWDs should outline the roles, expectations, and responsibilities of key stakeholders, CBOs, and CalFresh Outreach partners, including those identified in the State Outreach Plan. CWDs may also consider including community volunteers.

CWDs and Outreach partners are reminded that during a disaster, the prohibition on using Federal funds for radio, television, and billboard advertisements does not apply when promoting D-CalFresh. This prohibition also does not apply to social media, so long as the message is not a recruitment activity designed to persuade people to apply for CalFresh benefits generally.

CWDs may coordinate disaster communications through email, telephone, or other means. Especially as part of a large-scale response, CWDs should plan to respond to requests from the news media, organize press events and news conferences, and coordinate communication for key media issues relating to the operation of D-CalFresh. Communication strategies should include outreach to non-English language media and media serving LEP populations.

When developing disaster communications, CWDs should address:

- The timeframe in which D-CalFresh applications will be accepted.
- The geographic areas eligible for D-CalFresh, as well as whether or not those individuals who lived or worked in the area, or both, may apply.
- Application site locations and operating hours.
- D-CalFresh eligibility and verification requirements, including reminders to bring proof of identification to the application site.
- D-CalFresh application information, including information specific to applicants with special needs, availability of language services, and assistance for people with disabilities.
- Instructions for ongoing CalFresh households, including information on supplements.
- Non-discrimination policy.
- Civil and criminal penalties for fraud.

- Comprehensive lists of additional resources to assist people in need, including information on 211<sup>1</sup> and emergency food.

## **CBOs AND OTHER OUTREACH PARTNERS**

CBOs and Outreach partners play vital roles in regular CalFresh operations and are especially crucial for public awareness during the operation of D-CalFresh. In order to increase public awareness during the operation of D-CalFresh, CBOs and Outreach partners may be responsible for the following:

- Providing a lead Outreach Coordinator and staff in the field when deemed necessary by CDSS CalFresh Outreach and the CWD.
- Assisting and collaborating with CDSS CalFresh Outreach and the CWD in the development and implementation of the public information plan, particularly for LEP, elderly, people with disabilities, and other hard-to-reach populations.
- Distributing Outreach flyers and press releases to local partners in the designated affected disaster areas.

## **VOLUNTEERS**

Outreach partners and other volunteers from CBOs may be utilized at D-CalFresh application sites for things such as crowd control, translation, application assistance, etc. However, volunteers cannot perform any eligibility or certification functions.

## **APPLICATION SITE SELECTION AND SET-UP**

### **D-CALFRESH APPLICATION SITES**

D-CalFresh applications may be processed at D-CalFresh application sites, including functional CWD offices. If CWD offices are not easily accessible (i.e., building structure failure, or distance from the disaster area) the county may be required to set up alternative sites.

### **D-CALFRESH APPLICATION SITE STAFFING**

D-CalFresh and CalFresh must run concurrently. In order to maintain regular CalFresh operations, office managers and the agency director may need to make daily staffing decisions. Staff may need to be moved from their normal work sites to cover shortages at other sites. Based on system availability, work can be moved from one site to

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<sup>1</sup> 211 is the dialing code for quick, free access to information about topics such as community, health, human, and disaster services. 2-1-1 is the Statewide network of local 2-1-1 information and referral providers. Please note that not all areas statewide have a local 2-1-1 service provider.

another and assigned based on staffing needs. Language needs should be considered when making staffing decisions.

## **SITE SELECTION PROCEDURES**

The following criteria can be used to identify suitable alternate facilities/locations for D-CalFresh application sites:

- Safety from natural hazard risk factors.
- Sufficient space and equipment to sustain the disaster team.
- Accessibility for people with disabilities.
- Consideration of human comfort and needs.
- Available communications with all essential internal and external organizations, other departments, affected customers, and the public.
- Reliable logistical support, services, and infrastructure systems, including water, electrical power, heating, air conditioning, restroom, parking, etc.
- Ability to sustain operations for at least 30 days.
- Appropriate physical security and access controls.

The D-CalFresh Application Site Adequacy Review Checklist may be used when pre-planning to support potential D-CalFresh application sites.

The checklist can also be used during site setup, to determine if the site meets the needs of the particular disaster. It can also be utilized in situations at the time of a D-CalFresh operation, where a planned site becomes unavailable and an alternative site must be selected.

## **ONSITE SECURITY**

Ensure that the level of security is commensurate with the anticipated number of applicants. A strong security presence can go a long way in maintaining control of large crowds.

**Tip:** Counties that have implemented D-CalFresh recommend contingency planning for large crowds, even when they may not be expected, such as an application numbering or an application triage system. CWDs should also identify additional space that may be available, in case the waiting or application processing area must be expanded.

Suggestions for improving security onsite are detailed in the following table:

Onsite Security List	
Security Type	Suggestions
<b>EBT Security</b>	<ul style="list-style-type: none"> <li>• Restrict access to issuance storage sites by arranging seating, eligibility determination areas, and queues away from this area.</li> <li>• Minimize the number of staff members that have access to the issuance/storage sites.</li> <li>• Coordinate card security procedures with onsite law enforcement personnel.</li> </ul>
<b>Staff/Applicant Security</b>	<ul style="list-style-type: none"> <li>• Arrange site to minimize crowd density during wait.</li> <li>• Provide private break rooms and bathrooms for staff.</li> <li>• Minimize visibility of special treatment for elderly and people with disabilities.</li> <li>• Post signs at certain places in line, estimating the wait from that point. Include hours and days of operation for clients who prefer to return at another time.</li> <li>• Give out numbers to reduce disputes over places in line.</li> </ul>
<b>Crowd Control</b>	<ul style="list-style-type: none"> <li>• Direct applicants with special needs to appropriate lines/waiting areas.</li> <li>• Utilize a zigzag pattern to manage a long line and create staging areas to keep people moving.</li> <li>• Use the public address systems to broadcast pre-recorded, looped informational messages in multiple languages.</li> <li>• Consider assigning application days within the application period based on an arbitrary factor, such as the first letter of last name.</li> <li>• If all applications in line cannot be accepted, designate a cut-off point and issue tickets to those beyond the cut-off for priority return the next day.</li> </ul>

## MEASURES TO ENSURE ACCESS

Facilitating access for LEP, people with disabilities, and elderly individuals is an important component of the disaster response effort. While it is the nature of disasters to create extenuating circumstances, it is important for CWDs to make their best effort to plan for and carry out solutions to ensure that all eligible applicants, including those who face special challenges or barriers to access, are able to apply for and receive benefits.

### ELDERLY AND PEOPLE WITH DISABILITIES

The Americans with Disabilities Act (ADA) and other laws require CWDs to provide equal access to people with disabilities, including the provision of reasonable

accommodations. In addition to the requirements of the ADA, special provisions should be made for the elderly and people with disabilities to ensure their safety and comfort.

<b>Elderly and People with Disabilities Provisions List</b>	
<b>Need</b>	<b>Suggestions</b>
<b>Outreach</b>	<ul style="list-style-type: none"> <li>• Provide a mobile D-CalFresh unit, using a bus or van, and visit neighborhoods where large numbers of elderly or people with disabilities live.</li> <li>• Send D-CalFresh workers to individual applicant homes, as resources allow.</li> </ul>
<b>Access to Site</b>	<ul style="list-style-type: none"> <li>• Select sites that will be physically accessible to the elderly and people with disabilities.</li> <li>• Select sites that are served by public transportation.</li> <li>• Notify local paratransit authorities of the application/issuance site locations.</li> <li>• Designate parking spots near the site entrance for elderly or people with disabilities.</li> <li>• Assign staff to escort elderly or people with disabilities from their car/bus using wheelchairs or golf carts.</li> </ul>
<b>Reduced Wait Time</b>	<ul style="list-style-type: none"> <li>• Designate a special waiting/eligibility/issuance determination area for use by the elderly and people with disabilities.</li> <li>• Equip eligibility and issuance staff assigned to the site for elderly or people with disabilities with large print, Braille, and/or audio versions of their state application materials.</li> </ul>
<b>Human Comforts</b>	<ul style="list-style-type: none"> <li>• Create a special waiting application/issuance area for use by the elderly or people with disabilities.</li> <li>• Equip application/issuance areas with accessible versions of state application materials, (e.g., large print, Braille, and/or audio versions).</li> <li>• Prepare staff to provide attentive service to applicants who need extra explanation of application questions and/or assistance completing the application.</li> <li>• Offer snacks and beverages to applicants and periodically query applicants about any immediate human comfort needs they might have.</li> <li>• Ensure that bathrooms are easily accessible (e.g., short distance, free of obstacles). If the county uses portable toilets, an appropriate number of handicapped-accessible portable toilets and hand washing units should be arranged.</li> </ul>



Elderly and People with Disabilities Provisions List	
<b>Authorized Representatives</b>	<p>All regulations governing the use of an authorized representative (AR) for regular CalFresh will be applied to D-CalFresh, including:</p> <ul style="list-style-type: none"> <li>• The AR designation will be made in writing by the head of the household, spouse, or other responsible member of the household.</li> <li>• The CWD will verify the identity of the AR and the applicant.</li> <li>• For complete regulations on this subject, see CFR 273.2(n).</li> </ul>

## WAIVING THE FACE TO FACE INTERVIEW REQUIREMENT

In addition to the special provisions highlighted above, under special circumstances, the CWD may consider requesting a waiver of the face to face interview requirement as an accommodation for elderly and people with disabilities. This alternative procedure may be requested to ensure access and facilitate the interview for elderly or people with disabilities who may not be able to appear physically at the D-CalFresh application site. A phone interview may be conducted in place of the face to face interview. As part of the D-CalFresh request, the CWD must include a description of the alternative procedures that will be used to ensure that phone interviews are effectively conducted for the target population. Interested CWDs should work closely with CDSS to incorporate a waiver of the face to face interview requirement into their D-CalFresh requests since FNS has not regularly approved waivers of the D-SNAP face to face interview requirement.

## CONTROLLING USE OF SPECIAL PROVISIONS

The table below addresses some ways that the county may maintain order, as well as the appropriate use of the special provisions for the elderly and people with disabilities:

Controlling Use of Special Elderly and People with Disabilities Provisions List	
Need	Suggestions
<b>A Large Number of Elderly and People with Disabilities</b>	<ul style="list-style-type: none"> <li>• Distribute a public service announcement, informing potential applicants that elderly and people with disabilities may designate an AR to apply for them.</li> <li>• If needed, issue a public service announcement, asking the community for additional volunteers to assist elderly and people with disabilities.</li> <li>• Increase staffing at application/issuance sites serving the elderly or people with disabilities.</li> </ul>

## Controlling Use of Special Elderly and People with Disabilities Provisions List

	<ul style="list-style-type: none"> <li>• Designate a separate area or site to serve elderly or people with disabilities.</li> </ul>
<b>People Feigning Illness, Injury or Disability to Get Faster Services</b>	<ul style="list-style-type: none"> <li>• Provide first aid staff or other medical professionals to identify applicants in need of special treatment.</li> <li>• Attempt to make special/faster services less conspicuous to persons in the regular line.</li> </ul>

## PROVISIONS FOR SERVING LEP APPLICANTS

CWDs should provide meaningful access to D-CalFresh applicants who are LEP through the use of bilingual staff, interpreters, and translated documents.

CWDs should consider the potential increase in the number and/or proportion of LEP applicants for D-CalFresh over regular CalFresh and plan for language services accordingly. In addition to normal language access measures, CWDs may consider increased bilingual staffing, translation of signs, and multilingual recorded crowd control messages. CWDs should also consider the need for backup interpreters (either in person, by telephone or video) to avoid undue delays for LEP customers.

D-CalFresh staff should be trained in the CWD's language access policies and procedures, including any special provisions that apply.

## LEP Provisions List

<b>Language Services</b>	<ul style="list-style-type: none"> <li>• Provide language services onsite for LEP customers.</li> <li>• Plan language services based on county language demographics.</li> <li>• Provide an American Sign Language interpreter on site.</li> <li>• Assign staff at the application site to identify and direct applicants with language barriers.</li> <li>• Provide access to the language line and/or contract interpreters for language services not covered by bilingual staff or staff interpreters.</li> <li>• Where documents have not been translated into the applicant's language, offer sight translation such as oral interpretation of original English-language documents into the language spoken by the applicant.</li> </ul>
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## PROCEDURES TO REDUCE APPLICANT HARDSHIP

Addressing the human comfort needs of applicants is very important to the disaster response effort. Applicants are unlikely to come prepared for a long wait and will need

some of their basic needs provided for at the D-CalFresh application/issuance site. Not only must these possible needs be addressed for humanitarian reasons, but also to decrease the likelihood of crowd control problems.

D-CalFresh application sites will offer the following for all applicants:

- Water
- Protection from the elements
- Bathrooms
- Snacks, when feasible
- Minor medical care, when feasible

**Tip:** These services can be provided by other agencies or resources.

## HUMAN COMFORTS

The table below lists potential steps counties may take to address human comforts during the operation of a D-CalFresh:

Human Comforts List	
Possible Need	Suggestions
Medical Care	<ul style="list-style-type: none"> <li>• Have ambulance and first aid personnel available on-site.</li> <li>• Allow volunteer doctors, nurses, and other health care workers onsite to handle basic first aid issues.</li> </ul>
Water/Food	<ul style="list-style-type: none"> <li>• Locate application/issuance sites near mass feeding sites.</li> <li>• Provide water tanker trucks with drinking water and/or several smaller water stations.</li> <li>• Provide small pre-packaged snacks.</li> <li>• Provide baby food and formula for infants (pre-made bottles, dairy, and non-dairy).</li> <li>• Provide a Red Cross canteen or other volunteer-run canteen.</li> <li>• Assign support staff to man water stations.</li> </ul>
Protection from the Elements	<ul style="list-style-type: none"> <li>• Provide tents for shade/protection from rain.</li> <li>• Set up fans/heaters as appropriate.</li> <li>• Use a large, protected structure for the application/issuance sites such as a stadium/coliseum, gymnasium, etc.</li> <li>• Run queues through hallways/breezeways to avoid exposure to the elements.</li> </ul>
Bathrooms	<ul style="list-style-type: none"> <li>• Select sites which include several toilets.</li> </ul>

## Human Comforts List

- Provide portable toilets and, if possible, place them in areas with privacy, as well as making them accessible to the elderly and people with disabilities.
- Ensure that toilets are serviced at least once a day.

## CROWD CONTROL

Crowd control measures are critical to the operation of the application site. In past disasters, large crowds have caused unanticipated problems, and even smaller crowds have raised issues that could have been addressed in advance.

The following table addresses some measures your county can take to ensure crowd control during D-CalFresh operations:

## Crowd Control Checklist

Issue	Suggestions
<b>Regulating the Number of People In Line and Wait Times</b>	<ul style="list-style-type: none"> <li>• Provide security at the entrance, at the line cut-off point, and at the parking lot entrance.</li> <li>• Post signs at certain locations in the line, suggesting alternative ways to apply, estimating the wait time from that point, and listing hours and days of operation.</li> <li>• Issue public announcements advising that applicants come later in the day, return later in the application period, or go to another location.</li> <li>• Provide staff to screen for basic requirements (residence, ID, etc.) in line to reduce the risk of people who are not eligible waiting in line.</li> <li>• Direct applicants with special needs (e.g., elderly, people with disabilities, non-English speaking, ongoing recipients) to appropriate lines for special handling.</li> </ul>
<b>Streamline the Process</b>	<ul style="list-style-type: none"> <li>• Use ropes, barriers, or features unique to the facility.</li> <li>• Post directional signs (e.g., "Wait Here Until Number is Called").</li> <li>• Use bullhorns or a public address system to provide information to applicants in line. Pre-recorded, looped informational messages in multiple languages may be used to inform the crowd about the application process, what will be needed, and the various areas located at the site.</li> <li>• Arrange the queue to move from one station to another to give applicants a sense of progress and reduce anxiety.</li> <li>• Give out numbers to reduce risk of arguments over place in line.</li> </ul>
<b>Security</b>	<ul style="list-style-type: none"> <li>• Provide an adequate number of visible security officers.</li> <li>• Maintain Disaster EBT cards in a secure location, out of the sight of the crowd.</li> </ul>

## **EBT SYSTEM FUNCTIONALITY**

In preparing to operate D-CalFresh, CDSS and the CWD will notify EBT Operations if access to disaster functionality on Electronic Payment Processing and Information Control (EPPIC) is required. From there, OSI-EBT Operations will notify the affected consortia and activate disaster services or other system procedures related to EBT. If the county is not able to access the eligibility system for whatever reason, CDSS and the CWD will need to request User IDs to access the disaster set up screens in EPPIC.

## **APPLICATION OVERVIEW**

### **D-CALFRESH PRE-REGISTRATION**

A D-CalFresh application can only be submitted during an approved D-CalFresh application period. Under the pre-registration option, a CWD can elect to collect client information during the period prior to the approved D-CalFresh application period and schedule the required face to face interview and verification collection to occur during the approved D-CalFresh application period. Under this option, the first day of the approved D-CalFresh application period is considered the application submit date for clients that have pre-registered.

### **D-CALFRESH PAPER APPLICATION**

Households may apply for D-CalFresh benefits by completing the D-CalFresh application ([CF 385](#)). D-CalFresh applications will always be accepted in person. Depending on the disaster response, applications may also be accepted online (see below). D-CalFresh applications are never accepted by mail, due to the limited length of the application period.

### **ONLINE D-CALFRESH APPLICATION**

Upon requesting to implement D-CalFresh, the CWD should decide whether or not to utilize D-CalFresh online application functionality. If the decision is made to utilize online application functionality, households applying for D-CalFresh benefits online must complete the interview and verification submission process. Online D-CalFresh applications can only be accepted during the approved D-CalFresh application period.

## **PROCESSING D-CALFRESH APPLICATIONS**

The basic principles and framework contained in this section will apply to any disaster. The county is responsible for complying with the following areas during a disaster:

## **COMPLETING THE APPLICATION**

Applicants must complete a D-CalFresh application in person or online. All D-CalFresh applicants, including online applicants, almost always need to be interviewed in person. (For more information, refer to the *Alternative Interview Methods to Ensure Access* section.) Interviews may take place at the D-CalFresh application site, or if operational, at the CWD office.

## **SCREENING**

Deploying pre-screeners to lines or to the pre-interview waiting area is a strategy to control crowds and improve customer service. Screeners should be familiar with basic eligibility requirements so that they can readily share this information with applicants. No applicant should be discouraged from applying. Screeners should simply offer information, so that each household can make an informed decision about whether or not to apply. Screeners can also check to see if applicants have the required verification documents. They can also direct ongoing clients and new D-CalFresh applicants to the correct lines.

Staff and/or volunteers should be available at the D-CalFresh application site to distribute applications and answer questions. Ensuring that applications are as complete as possible before clients reach the interview stage will help to keep the process moving quickly. Posting signs with simple instructions may also aid in this effort. CWDs should take into account LEP applicants and customers when preparing to make staff and/or volunteers available, as well as when creating signage.

## **DUPLICATE PARTICIPATION INFORMATION**

Information regarding duplicate participation checks should be announced in publicity materials and posted at the application site. CWDs may check for duplicate information up front or may accept applications and inform applicants that eligibility is contingent upon the subsequent duplicate check.

CWDs are required to screen for duplicate participation in:

- D-CalFresh and CalFresh
- D-CalFresh and household disaster distribution of USDA Foods
- Multiple D-CalFresh issuances with overlapping benefit periods
- Approved D-CalFresh and denied D-CalFresh applicants

## **INTERVIEW AND CERTIFICATION**

The D-CalFresh interview is an important element in the certification process because it allows the eligibility worker time to review potentially confusing concepts (such as the

benefit period or deductible disaster related expenses) with the applicant and to verify the information presented on the application. An interview is required prior to certifying the household for benefits. Similar to regular CalFresh, households unable to apply in person may designate an AR to apply on their behalf.

Interview areas should be set up to protect applicant privacy to the extent possible. During the D-CalFresh interview, the eligibility worker should ask about:

- Proof of Identity for head of household (Confirm names and birthdays of other household members.)
- Household composition as it existed the day the disaster struck.
- Residency (or employment, if applicable) in the disaster area.
- Income available/anticipated during the entire benefit period (Confirm places of employment for all working members of the household and record this information on the application.)
- Accessible liquid resources available at the start of the benefit period.
- Impact of the disaster on the household
  - What adverse effects did the household suffer (i.e., flooding, fire damage, power outage)?
  - How much did they pay (or do they anticipate paying) for these expenses during the benefit period?
  - How did they pay for these expenses? (Only expenses paid out of pocket, and not merely incurred, are countable.
  - Did they receive reimbursement for any of these expenses?

**Tip:** Households applying for D-CalFresh may not be familiar with the CalFresh “purchase and prepare” definition of a household. During the interview, CWD staff may need to provide information distinguishing the definition of a CalFresh household from a household based on a group of individuals who live together. This may prove especially true if families have applied for other disaster assistance for the household based on residence address.

## **ALTERNATIVE INTERVIEW METHODS TO ENSURE ACCESS**

All interviews must be conducted face-to-face at a D-CalFresh application site, except in circumstances where the county determines that special alternative procedures are required to facilitate the interview for applicants otherwise unable to appear physically at the D-CalFresh application site. Best practices for the county to consider in providing reasonable accommodations and interview access to the elderly, persons with disabilities, and other vulnerable populations include:

- Satellite application sites strategically located to serve vulnerable populations (i.e., community or senior centers).

- Special public transport to and from application sites.
- Home visits to conduct interviews for applicants with disabilities that make them otherwise unable to visit the application site.
- Skype or similar technology to facilitate off-site interviews.

As previously mentioned, in addition to the special provisions highlighted above, under special circumstances, the CWD may consider requesting a waiver of the face to face interview requirement as an accommodation for elderly and people with disabilities. Interested CWDs should work closely with CDSS to incorporate a waiver of the face to face interview requirement into their D-CalFresh request since FNS has not regularly approved waivers of the D-SNAP face to face interview requirement.

CDSS expects and encourages the CWD to consider the potential needs of disaster survivors with disabilities in their community and to include any special accommodations and alternative interview procedures as part of their D-CalFresh plan.

## **VERIFICATION**

Verification rules are eased during a disaster to reduce administrative burdens and to reflect the reality that households and eligibility workers may not have access to the usual verification sources. County eligibility workers should exercise reasonable judgment when evaluating the truthfulness of applicant statements. (See the section on *D-CalFresh Verification Requirements* for more information.)

Public information campaigns should indicate that applicants are expected to bring all available verification documents. In addition, CDSS encourages the use of data matching systems, such as the Income and Eligibility Verification System (IEVS), whenever possible. The data in the system will not be able to provide an updated picture of household circumstances post-disaster; however, the matches may assist in finding unreported sources of income, and suspect cases could be referred to program integrity staff for further investigation.

## **D-CALFRESH ISSUANCE**

Each CWD must be prepared to issue D-CalFresh benefits through their respective consortia and the state's EBT system.

A CWD's D-CalFresh issuance plan should incorporate procedures for:

- Ensuring that benefits are made available as soon as possible and no later than three calendar days (except for questionable cases in which issuance may be delayed up to seven days) from the date the application was filed.
- Accessing sufficient EBT card stock to operate D-CalFresh.
- Minimizing the number of times recipients return to a disaster assistance location for benefit application and issuance.



- Checking for duplicate participation of all household members.

After an applicant is determined eligible for D-CalFresh, an EBT card must be issued to allow client-access to D-CalFresh benefits. During the application period, the CWD will need to maintain a sufficient supply of EBT cards to ensure that certified households are able to access their benefits within 72 hours of application (except in cases of questionable applications). Whenever possible, the issuance process should minimize the number of times recipients return to the disaster assistance location for benefit application and issuance.

EBT cards are negotiable items and must be handled by benefit issuance staff only. Procedures must be in place to ensure that eligibility workers do not issue both the benefits and the EBT card.

Special Disaster EBT cards may be required if the CWD is unable to issue EBT cards using normal systems. In these circumstances, the CWD should work with CDSS to coordinate the supply of Disaster EBT cards. Disaster EBT cards are produced pre-pinned and stored in advance of disasters.

## PROCESSING OVERVIEW: PAPER VS. ONLINE APPLICATION

The table below provides a sample processing overview, comparing the differences in processing a D-CalFresh paper application versus an online application:

D-CalFresh Paper Application	D-CalFresh Online Application
<p>Support Staff:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Receives the paper application from the customer.</li> <li><input type="checkbox"/> Completes the file clearance.</li> <li><input type="checkbox"/> Pends the application.</li> <li><input type="checkbox"/> Places the paper application in a bin for a D-CalFresh worker to pull when ready to interview.</li> </ul>	<p>Support Staff:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Retrieves the D-CalFresh online application from the eligibility system.</li> <li><input type="checkbox"/> Completes the file clearance.</li> <li><input type="checkbox"/> Links the D-CalFresh online application.</li> <li><input type="checkbox"/> Contacts the household to schedule the face-to-face interview.</li> </ul>
<p>The D-CalFresh Worker:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Pulls the paper application from the bin.</li> <li><input type="checkbox"/> Completes the face-to-face interview.</li> <li><input type="checkbox"/> Determines D-CalFresh eligibility.</li> <li><input type="checkbox"/> Updates County Use Only section on the CF 385.</li> <li><input type="checkbox"/> Completes a journal entry.</li> </ul>	<p>The D-CalFresh Worker:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> At the time of the pre-scheduled face-to-face interview, receives the D-CalFresh online application and completes the interview.</li> <li><input type="checkbox"/> Determines D-CalFresh eligibility.</li> <li><input type="checkbox"/> Completes a journal entry.</li> </ul>

## SEPARATION OF DUTIES

Certification and issuance responsibilities must be separated in order to minimize the risk of employee fraud. Volunteers may not participate in any certification, interview, data entry, or issuance functions.

## ASSISTING ONGOING CALFRESH HOUSEHOLDS

During the D-CalFresh application period, the CWD will issue supplemental benefits to ongoing households that apply for D-CalFresh or submit a CF 303 so that they may receive the maximum allotment for parity with new D-CalFresh households. Supplements are authorized under the provisions of D-CalFresh and must be referenced in the request to operate D-CalFresh. Supplements can be issued individually or automatically, depending on the circumstances of the disaster and the CWD's capabilities in the aftermath of the disaster. Only households that received regular CalFresh benefits during the D-CalFresh benefit month are eligible to receive a supplement.

Please note, the CWD may issue supplements to ongoing households whose benefits were previously replaced as a result of the same disaster. The amount of the supplement is equal to the difference between the maximum allotment for the household size and the household's regular CalFresh allotment.

In limited scenarios, due to the timing of the D-CalFresh benefit period, it is possible to provide an ongoing CalFresh household with D-CalFresh benefits. This is possible because the D-CalFresh benefit month is tied directly to the disaster start date, which is specified in the Presidential Declaration with IA. For example, if the disaster start date is in July, the D-CalFresh benefit month will be *July*, but the D-CalFresh benefit period may run through *August*. In this scenario, an eligible D-CalFresh applicant household may receive D-CalFresh benefits for July and regular CalFresh benefits for August. As mentioned, only households that received regular CalFresh benefits during the D-CalFresh benefit month are eligible to receive a supplement.

## ISSUANCE OF INDIVIDUAL SUPPLEMENTS

As the name suggests, individual supplements are issued based on a request made by an individual household. Individual supplements work best in areas where there is only a small-scale disaster and the county can administer individual supplemental benefits to ongoing households at the same time as taking applications for D-CalFresh benefits from new households.

As the income status of all ongoing households is already known and verified, the CWD is not required to have ongoing households complete a separate D-CalFresh application or complete a D-CalFresh interview. That said, an ongoing household may inadvertently submit a D-CalFresh application and the CWD may use this to issue a supplemental benefit.

The preferred method to request a supplemental benefit, is for ongoing households to file a CF 303 Replacement Affidavit, in person or by telephone, during the D-CalFresh application period. The affidavit includes an attestation that the household has lost income or incurred disaster-related expenses. This information is sufficient to determine an ongoing household's eligibility for supplemental benefits.

## **ISSUANCE OF AUTOMATIC/MASS SUPPLEMENTS**

Automatic/mass replacements are issued to ongoing households based on information already known to the CWD, such as ZIP codes impacted by qualifying power outages or mandatory evacuations. Automatic/mass supplements generally work best when there is a large-scale disaster by allowing the county to more quickly and efficiently meet the needs of ongoing households affected by the disaster.

The decision to issue automatic/mass supplements depends on the severity and scope of the disaster event, and the ability of the county to address the needs of ongoing households at the same time that new households are applying for the D-CalFresh benefits. To issue automatic/mass supplements, the CWD must include automatic/mass supplements within the county's D-CalFresh request. As well, the CWD must indicate whether the automatic/mass supplements will be issued for ongoing households countywide or for a specific area within the county, for example, based on household ZIP code. This decision is based on the evidence of the disaster impact available to the CWD.

## **ONSITE REVIEW**

FNS requires that CWDs provide for immediate, onsite supervisory review for all denied D-CalFresh applicants. Eligibility workers should notify applicants of the right to this review and inform them that it will not affect their right to a fair hearing. Denied cases must be input into the CWD's system to allow for duplicate checks and may not be reopened. Clients whose circumstances have changed after they filed an application and were denied must reapply for the D-CalFresh during the application period. Previously denied households that reapply should be referred to supervisory staff or investigators for review.

## **EBT CARD STOCK & EBT ISSUANCE**

### **CARD STOCK**

CWDs are responsible for ordering sufficient EBT cards. EBT Operations must receive requests via e-mail at [ebtoperations@osi.ca.gov](mailto:ebtoperations@osi.ca.gov), or if email is unavailable, by calling EBT Operations at (916) 263-6600.

In addition to regular EBT cardstock, CWDs may need to order special Disaster EBT cards. Disaster EBT cards are only required when regular EBT operations have been disrupted.

CWD ordering instructions for Disaster EBT cards are as follows:

- Provide complete physical mailing address for cards. It must be a deliverable address (e.g., no county fairgrounds, no P.O. Box, etc.).
- Provide complete contact information for the person receiving cards (signing delivery documentation), including telephone number and cellular number, if available.

When ordering Disaster EBT cards, CWDs should be aware of the following:

- Disaster EBT Cards are delivered within 24 hours after receipt of order.
- The CWD contact person must be onsite to personally take delivery of Disaster EBT cards.
- Disaster EBT cards must be kept in secure storage.
- For security purposes, the county should validate the number of cards received.
- Disaster EBT cardstock can be ordered in quantities of 500.
- A Disaster EBT card is distinguishable from a regular EBT card by the word “DISASTER” printed on the EBT Card.
- Disaster EBT cards are pre-pinned, but not pre-loaded with benefits.
- Cardholders who receive a pre-pinned Disaster EBT card MUST use the Personal Identification Number (PIN) that is printed on the card carrier.
- PINs can be changed at any time via a PIN Select device or the Automated Response Unit, if the cardholder uses a valid Social Security Number and date of birth.
- D-CalFresh recipients who apply for regular CalFresh benefits after the disaster has ended can have their benefits added to the Disaster EBT card. However, a client should eventually obtain a new EBT card.

## **REPLACEMENT CARDS FOR ONGOING CLIENTS**

Ongoing CalFresh households may lose their EBT cards in a disaster, especially when they have relocated quickly to avoid harm. CWDs should be prepared to assist ongoing CalFresh households in securing a replacement EBT card. Further, displaced households may request a replacement card from any CWD statewide. At the time of a disaster, CWDs across the state should be ready and able to work with residents of disaster impacted counties and their corresponding CWD to replace the EBT card for the client remotely.

## **RECONCILIATION**

The CWD must develop a system for reconciling both cards and benefits. Cards shipped from a central location should be tracked until distributed locally to households. Each issuance site needs to maintain a beginning and ending inventory and track new cards received, total cards available, and cards issued. The method of distribution for cards – whether drop shipped, pulled from blank card stock, mailed, or delivered by some other means, will most likely dictate the specific requirements for reporting and reconciliation. If the CWD assigns PINs, it must also account for PIN mailers or envelopes to ensure adequate security, except when the PIN is formulated from the Primary Account Number. The CWD must also reconcile the number of cards set up with EBT accounts and the number of cards issued, as well as research and explain any discrepancies.

It is important that CWDs track disaster benefits separately from ongoing benefit issuance. The EBT contractor has added separate disaster benefit lines to administrative screens to enable the CWD to track disaster benefit drawdown distinctly from ongoing benefits. The CWD also must adhere to FNS reconciliation guidelines so that they can compare benefits posted to accounts to benefits issued by the CWD eligibility system.

## **EXPUNGEMENT**

As previously mentioned, CWDs may request the use of a shorter timeframe (typically 90 days) for expunging disaster benefits than for expunging regular SNAP benefits. Following the implementation of the Food and Nutrition Act of 2008, this requires waiver approval from FNS. This waiver must be submitted with the D-CalFresh request, so that FNS may transmit the waiver request to the Retailer Policy and Management Division.

Any CWD operating under this waiver must inform D-CalFresh households of the timeframe for expunging benefits. This waiver may only be used when the CWD has received a Presidential Declaration with IA and is operating D-CalFresh. System designers must work with the EBT contractor to develop a process for expunging disaster benefits from the EBT system. To do this, the CWD system must identify the disaster cases and benefits uniquely, which is also required for FNS reporting. The EBT provider should make a corresponding report to the state agency to identify the value of disaster benefits expunged.

## **FRAUD PREVENTION**

Effective fraud prevention strategies should be considered in the pre-planning phase and carried out through the length of the D-CalFresh operation. In the wake of a disaster, the focus is often on how to distribute benefits as soon as possible. CWDs must find a balance between responding quickly and encouraging participation, all while protecting program integrity.

Focusing on integrity during all phases of the disaster response will also minimize the likelihood that problems will need to be addressed through audits. Thorough training of all staff and supervisors on D-CalFresh policy and fraud prevention strategies will also aid in this effort.

## **APPLICATION/ISSUANCE SITE CONTROLS**

To ensure that only eligible households receive benefits and that the amount of benefits issued is accurate, counties operating D-CalFresh must:

- Input information for all household members into the eligibility determination system as soon as possible, in order to prevent individuals from obtaining D-CalFresh benefits as a member of more than one household.
- Input denied D-CalFresh applications into the eligibility determination system as soon as possible, so that households that are denied and later reapply are detected and referred to fraud prevention staff. Please note that such households may be eligible if their circumstances have changed.
- Check for duplicate participation using onsite or offsite computer databases or hardcopy participant lists. Update computer database or hardcopy participant lists every day.

In addition, CWDs may:

- Confirm household composition by asking applicants at the start of the screening interview for names and dates of birth for all household members and then request that they repeat the information later.
- For those households with a questionable application, delay issuance of benefits for up to seven days from the date of application to allow some verification and/or cross-checking.
- Request that households bring verification of non-required items (household composition, residency, income/resources and food loss), provided that applicants are not denied based solely on the unavailability of verification.

## **PREVENT EMPLOYEE FRAUD**

CDSS recognizes that, in many cases, CWD employees are affected by the disaster and may be eligible for D-CalFresh benefits. CWDs should balance encouragement of eligible employees applying for D-CalFresh benefits, while weighing the risk that someone close to the program may take advantage of his or her access and fraudulently apply for, or issue benefits. CDSS requires that CWDs take the following measures to prevent employee fraud:

- Use separation of duties for certification and issuance.

- Include a question on the D-CalFresh application asking if anyone in the household is employed by the affected CWD.
- Utilize supervisors or investigators to conduct employee certification interviews.
- Audit all approved CWD employee applications and publicize that policy.

CWDs can also exercise additional methods of preventing employee fraud, including:

- Auditing applications from all county employees.
- Auditing all applications from volunteers and others onsite, such as local police.
- Auditing denied applications from CWD employees.
- Conducting a wage match for all CWD employees prior to issuing benefits, if possible, or as part of the post-disaster review process.

## FRAUD MONITORING AND REPORTING

CWD staff should implement fraud prevention efforts throughout the application period. Specific fraud concerns (i.e., a household applying at two different sites) should be flagged and shared among all application sites and staff. Program integrity procedures should be modified as needed during D-CalFresh operations. Ongoing fraud issues, particularly those concerning employees, should be promptly reported.

## CLOSING OUT AN APPLICATION SITE

The CWD can follow the checklist below to close out an application site:

Subject	Suggestions
<b>Files</b>	<input type="checkbox"/> Organize applicant files. <input type="checkbox"/> Include issuance documents in files. <input type="checkbox"/> Review files to determine duplication. <input type="checkbox"/> Determine length of file retention. (The federal standard is a minimum of three years.) <input type="checkbox"/> Put files in boxes marked with site and box number.
<b>Issuance Records</b>	<input type="checkbox"/> Reconcile issuance at all sites. <input type="checkbox"/> Put issuance logs and records in boxes marked with site and box number.
<b>EBT Cards</b>	<input type="checkbox"/> Take inventory of EBT cards. <input type="checkbox"/> Return EBT cards to secure storage site.

Subject	Suggestions
<b>Equipment</b>	<input type="checkbox"/> Take inventory of all equipment (computers, copiers, fax machines, telephones) and other supplies, and compare with initial inventory. <input type="checkbox"/> Return equipment to lender, as appropriate.
<b>Staff</b>	<input type="checkbox"/> Complete time sheets for all personnel, including temporary personnel.
<b>Building</b>	<input type="checkbox"/> Clean as much as possible. <input type="checkbox"/> Maintain security until site is emptied.

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# **PART 7: FAIR HEARINGS, CLAIMS, AND RESTORED BENEFITS**

## **FAIR HEARINGS**

The requirement to conduct onsite supervisory reviews of denied applications should help to minimize the number of fair hearings requested. Even so, hearing proceedings may be ongoing for several months after the D-CalFresh application period has ended.

Any household who applied for D-CalFresh benefits and was denied may request a fair hearing. A household that disputes the household size used in calculating its D-CalFresh benefit amount may also request a hearing. Households who did not apply for D-CalFresh do not have the right to a fair hearing. This includes households who were unaware of D-CalFresh or who were not able to reach the application site during the application period.

A household which has requested a fair hearing is entitled to immediate onsite supervisory review. Households not satisfied with the outcome of this review retain the right to request a fair hearing through the normal process.

If a household wants to withdraw its request for a fair hearing, it may do so in writing.

## **CLAIMS**

In general, CWDs should follow existing claim collections requirements and procedures to establish a D-CalFresh claim. If a household receives D-CalFresh benefits to which it was not entitled, the CWD must establish a claim against the household consistent with the claims collection requirements of SNAP regulations. However, if a claim is

established against a household for an overpayment of CalFresh benefits, this amount may not be collected from the D-CalFresh allotment. Please also note that the D-CalFresh benefit cannot be used to pay an existing claim.

The CWD shall establish claims and issue repayment demand letters for over-issuances which are the result of:

- IPVs
- Inadvertent household errors
- Agency errors

## **RESTORED BENEFITS**

SNAP regulations require that CWDs issue restored benefits to households when benefits were lost:

- Due to an agency error.
- When a denial of benefits is subsequently reversed.

This requirement also applies to D-CalFresh benefits. CWDs should follow their normal procedures for issuance in such cases. The accountability system must clearly indicate that an issuance was a restored benefit.

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# PART 8: DAILY REPORTING AND POST DISASTER REPORTING

## DAILY REPORTING DURING D-CALFRESH

A CWD operating D-CalFresh must submit a daily report to CDSS, who will then submit the report to FNS. Daily reports are used to monitor program progress, troubleshoot problem areas, inform FNS policy officials, and respond to inquiries from the media and other government agencies. The CWD will begin submitting reports to CDSS on the day following the first day of the D-CalFresh application period and should continue submitting the reports on a daily basis until all D-CalFresh applications have been processed. Daily reports are usually due by 10:00 a.m. each day of the D-CalFresh operation. Daily reports must be submitted even if no or very few D-CalFresh applications have been submitted.

The Daily Report must contain:

- Number of new households approved
- Number of ongoing households receiving supplements
- Number of new persons approved
- Number of ongoing persons approved for supplements
- Number of new households denied
- Value of new benefits approved
- Value of supplements approved
- Average benefit per new household
- Average benefit per ongoing household

During D-CalFresh operations, CWDs will use the daily report template and reference the daily report instructions provided by CDSS. Please note that data collected in the daily report should be as accurate as possible, but will not be used to complete the post disaster review report. CWDs will have the opportunity to reconcile and finalize data at the end of D-CalFresh operations.

# CERTIFICATION REPORTING POST D-CALFRESH

## FNS-292B – 45 DAY REPORT

Within 45 days of the termination of D-CalFresh operations, CDSS must submit final disaster figures on the FNS-292B *Report of SNAP Benefit Issuance for Disaster Relief*. The FNS-292B must contain the following issuance data for D-CalFresh operations:

- Number of Households: New households issued D-CalFresh benefits
- Total Number of Persons Assisted: New persons issued D-CalFresh benefits
- Number of Certified Persons: Ongoing households issued supplements
- Value of Benefits Issued: Total benefits issued to new households and supplements issued to ongoing households

The FNS-292B report should not include the value of replacements issued, since they are not considered a disaster benefit. Once D-CalFresh operations are terminated, CDSS will contact the CWD to request the final data for the FNS-292 B submission. CDSS will submit the FNS-292B to FNS directly.

## POST-DISASTER REVIEW REPORT

To complete the required Post-Disaster Review Report, CDSS and the CWD will work together to conduct a comprehensive review of general program performance. In addition, CDSS and the CWD will complete individual reviews of D-CalFresh cases, along with a problem-analysis of the review findings. CDSS will then incorporate these findings, lessons learned, best practices, and proposed improvements to the CWD's systems, operational procedures, and D-CalFresh plan, into the review report. When complete, the review report will be transmitted to FNS.

The Post-Disaster Review Report must be submitted to FNS within 120 days of the termination of D-CalFresh operations.

## INDIVIDUAL REVIEWS

Individual reviews of D-CalFresh cases include both a sample of new D-CalFresh cases and a review of all approved CWD employee D-CalFresh cases.

CDSS must review a random sample of 0.5 percent of new D-CalFresh cases, up to a maximum of 500 cases, with a minimum sample size of 25 cases. The sample should include both approved and denied cases. Ongoing CalFresh households that received supplemental/replacement benefits should not be included in the sample, nor should CWD employee cases. (See below for CWD employee case review instructions.)

In addition to the review of public D-CalFresh cases, CDSS must review 100 percent of all approved CWD employee D-CalFresh cases and may, at its option, also review denied applications. In determining whether appropriate action was taken on the employee cases, CDSS must verify that the application was handled appropriately by a supervisor.

Depending on the size of the random sample and CWD employee cases, CDSS staff will complete the individual reviews. If additional support is needed to complete the reviews, CDSS will coordinate with CWD QC, when applicable.

No cases may be dropped for any reason. CDSS must report the information gathered even from incomplete case reviews. The results of the review will be included in the Post-Disaster Review Report.

D-CalFresh applications are not subject to QC review and are not included when determining SNAP timeliness and payment accuracy rates.

The required components of the individual reviews include case record review, verification, and interviews. A Disaster CalFresh Review Checklist was created to assist CDSS QC and CWDs, if necessary, in conducting individual reviews.

### Case Record Review

CDSS will review the household's application for problems (such as missing or inconsistent information, no identification provided, lack of signature, etc.) and re-determine eligibility using any new information provided. Additionally, the review will note any information the household has given about their place(s) of employment at the time of the disaster, which is helpful both for seeking verification of income and for locating the client for their interview.

### Verification

CDSS will focus the review of verification on identifying clients who failed to accurately report information about their circumstances, such as residency, food loss, income sources, or loss of work. CDSS will not focus on clients who could not accurately project their circumstances for the disaster benefit period.

Residency: CDSS will verify that the client lived (or worked, if applicable) in the disaster area. Residency can be verified by comparing the client's stated address to maps or lists compiled for use by workers during the operation of D-CalFresh. In most cases, CDSS will not need to request additional verification of residency from the household.

## Verification

Food Loss: If a CWD allowed food loss as a sole qualifier for D-CalFresh eligibility, CDSS will confirm that the household resided in a geographical area that experienced extended power outages (of the length designated in the D-CalFresh approval) or flooding, or that the household was otherwise affected by the disaster in a way that would be expected to lead to food loss. Verification can be achieved by comparing the client's stated address to maps of power outages, flooding, etc. In most cases, CDSS will not need to request additional verification of food loss from the household.

Income: Verification of income is intended to hold households accountable for accurately reporting sources of income or loss of work that were known to them at the time of the D-CalFresh application. It is not intended to penalize households for not being able to accurately determine their income/employment during the benefit period.

CDSS will review to see if the CWD performed data matching, which should include wage matching and IEVS matching (for each case selected for review), Beneficiary and Earnings Data Exchange matching, and any other matching the CWD normally uses to ensure that all known income sources were disclosed.

Disaster Related Expenses: CDSS will attempt to verify disaster-related expenses through discussion with the household during the interview. The reviewer will ask what expenses the household incurred and confirm that they are consistent with what the household reported at the time of the D-CalFresh application. The CDSS review will also ensure that the types of expenses claimed are appropriate. For example, if the CWD is aware that the household lives in a rental unit, claims for roof or window repair expenses would not be consistent with this type of living situation and should be further explored.

## Client Interview

The purpose of the interview is to review the client's statements on their D-CalFresh application, to explore any inconsistencies found through data matching or other sources, and to gather the client's reflections on the quality of the D-CalFresh service they received.

CDSS will make reasonable attempts to contact households and schedule interviews, using the resources available in the normal course of business, such as employers, internet searches, data brokering services, credit reporting services, etc. CDSS may conduct interviews at the same time as scheduled certification interviews for CalFresh, if the household is now participating in the regular program. If the client cannot be reached or does not attend the interview, CDSS will continue to review the case and report the results.

## PART 9: CONCLUSION

The Emergency Response Handbook was designed with the needs of the CWDs in mind. CDSS intends for the handbook to serve as a tool for effectively responding to a disaster, as well as planning and implementing a successful D-CalFresh operation that brings much-needed food assistance to disaster survivors. CDSS welcomes your insight on any of the topics highlighted in this document and invites CWDs to submit any recommended changes to this document. Future editions of the handbook will incorporate changes and updates based on lessons learned and best practices.

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