

An Advocate's Guide to the Disaster Food Stamp Program

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Food Research and Action Center

1875 Connecticut Ave. NW, Suite 540

Washington, DC 20009

(202) 986-2200

<http://www.frac.org>

ABOUT FRAC

The Food Research and Action Center (FRAC) is the leading national organization working for more effective public and private policies to eradicate domestic hunger and undernutrition.

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Attn. Wanda Putney
1875 Connecticut Avenue, N.W., Suite 540
Washington, D.C. 20009
Tel: 202-986-2200

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Introduction

Natural and human-caused disasters disrupt lives and inflict misery, and sometimes are of cataclysmic proportions. There is a natural human tendency to avoid thinking too long and hard about past disasters, and not to plan too much for future ones. Nevertheless, learning from the past and planning for the future are essential, especially in helping particularly vulnerable people—those with little income or resources—at particularly difficult times. Disasters may destroy personal property, cut access to financial resources, break off links to human services programs, interrupt employment, or result in sudden medical expenses. Particularly for low-income individuals and families, any of these misfortunes can precipitate a crisis.

Recognizing the need to assist low-income people in such precarious situations, the Food Stamp Act and the Robert T. Stafford Disaster Relief and Emergency Assistance Act grant the President and the U.S. Department of Agriculture (USDA) broad authority to provide emergency food assistance after disasters. This includes distribution of commodity foods, but the cornerstone of federal nutrition assistance in a disaster is the Disaster Food Stamp Program (DFSP). For example, the DFSP provided more than \$229 million in assistance in Florida after Hurricanes Ivan, Frances, Charley and Jeanne in seven weeks in 2004; \$56 million in Virginia after Hurricane Isabel in 2003; and nearly \$14 million after an ice storm in Oklahoma in 2001.

The DFSP provides replacement benefits for regular food stamp recipients who lose food in the disaster and extends benefits as well to many households which would not ordinarily be eligible but suddenly need food assistance. In order to ease the administrative burden on states, a DFSP typically includes temporarily relaxed verification and reporting requirements for the state's ongoing case processing activities. Like the regular Food Stamp Program, the DFSP is a state-administered program with fully federally-funded benefits that provide an economic boost to hard-hit communities.

In the aftermath of a disaster, advocates for low-income people are likely to find themselves drawn into the relief efforts. Advocates can play a critical role in urging their state and USDA to move quickly to implement a DFSP, distributing information about disaster benefits, assisting with outreach to vulnerable populations, and encouraging state agencies to design their relief efforts to reach as many victims as possible. State and local agencies, along with the clients themselves, are likely to need more support than usual from the advocacy, food bank and broader nonprofit communities when disaster strikes.

This paper explains how the DFSP works and what advocates, elected officials and service providers can do to help meet nutrition needs before, during and after a disaster. Whenever possible, it draws on the experience of recent disasters, including the terrorist attacks of September 11, 2001, the northeast blackout of 2003, and the hurricanes of 2003 and 2004. One particularly noteworthy resource is the Nutrition Consortium of New York State's report on the DFSP in New York City following the September 11, 2001 terrorist

attacks (hereafter the “Nutrition Consortium report”).¹ The report’s insights may be helpful for anyone involved in DFSP planning and advocacy.

Types of Disaster Food Assistance

There are a number of ways in which the federal government and the states can provide emergency food assistance following a disaster. Which program or programs are conducted depends on the nature of the disaster, the number of people affected by it, and the availability of normal infrastructure following the disaster. While most of this guide is about the DFSP, this section also reviews what other nutrition programs can do in a disaster.²

Disaster Food Stamp Program

The DFSP provides replacement benefits for food stamp households that lose food and also extends benefits to many people who would not ordinarily be eligible for food stamps. The latter part of the DFSP may be appropriate whenever there are large numbers of affected people who would not be helped under the eligibility criteria and benefit replacement processes of the normal Food Stamp Program. Conducting a DFSP requires that normal channels of food distribution, such as grocery stores, are operational. Subsequent sections of this guide provide extensive details on DFSP operations and rules.

Regular Food Stamp Program with Waivers

In lieu of a full DFSP, a state may opt to rely on the regular Food Stamp Program (FSP) but seek waivers from USDA to better meet the needs of those affected by the disaster. Under FSP regulations, it is always possible for individual food stamp recipient households which lose food in a “household misfortune” to obtain replacement benefits if they report the loss within ten days.³ In a disaster situation, however, this client-by-client process may not adequately serve the large numbers of people suddenly in need of replacement benefits. In past disasters, waivers granted by USDA have temporarily relaxed verification requirements, temporarily lifted restrictions on populations such as students, extended the usual ten-day time frame for reporting a loss of food, and temporarily waived employment and training requirements. Using this strategy to expand access to the regular FSP with

¹ The Nutrition Consortium report is available at <http://www.hungernys.org/programs/publications/disaster.html>.

²In past disasters, many localities have established a “disaster checkbook” to provide immediate cash assistance to those who did not meet eligibility criteria for the DFSP or other programs, or whose benefits would be delayed. Unlike the DFSP and the child nutrition programs, “disaster checkbook” benefits are not federally funded.

³See Code of Federal Regulations, 7 CFR §274.6. Available at <http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?TITLE=7&PART=274&SECTION=6&TYPE=TEXT>.

waivers may be an appropriate option if the disaster is relatively small or short-term, or if a few modifications to the existing program would meet disaster victims' needs.

One particularly effective and easy-to-administer waiver is automatic replacement of benefits. Following the 2003 blackout in the failure of the northeast power grid, Michigan obtained a waiver to automatically replace a half month's worth of benefits for all food stamp recipients in select counties.⁴ The replacement benefits were simply posted to each recipient's Electronic Benefits Transfer (EBT) card, with no special action required by the client. The waiver provided replacement benefits to many people quickly and easily, while leaving food stamp households experiencing more severe disaster-related need the option to apply for further benefits. Similar geographically-based waivers were used to put replacement allotments onto EBT cards for current recipients in many areas hit hard by hurricanes in the District of Columbia, Virginia, Maryland, North Carolina, and Florida in 2003 and 2004. Such broad-based replacement of benefits may also be a component of a full DFSP.

Commodity Distribution

With approval from USDA, states may release commodity foods—which are ordinarily intended for the National School Lunch Program, The Emergency Food Assistance Program (TEFAP), and other federal programs—and provide them to mass feeding sites. After the disaster is over, USDA replaces the commodities. If the President declares a major disaster, states may also distribute commodities directly to households.

The Federal Emergency Management Agency (FEMA), The American Red Cross, local food banks, and America's Second Harvest—The Nation's Food Bank Network also are likely to be involved. Many food banks distribute commodities from TEFAP and other federal programs, and in a time of disaster food banks likely will reach into their supplies of donated and purchased food as well. Commodity distribution is most appropriate in the immediate aftermath of a disaster, when ordinary channels of food distribution, such as grocery stores, may be disrupted. If such channels are available, however, FNS gives preference to the DFSP.

School Nutrition Programs

While the Food Stamp Program is the first line of defense in a disaster situation, other federal nutrition programs may make critical contributions to relief efforts. USDA has not developed specific guidance or regulations for disaster relief in relation to the School Breakfast, National School Lunch and Summer Food Service Programs. Instead, in disaster situations, USDA works closely with the state education agency to waive program requirements that would limit access to nutrition programs. In the past, for example, USDA has allowed the state to provide free meals to all students, regardless of income, in

⁴ Associated Press. "Food stamp recipients to receive new benefits." (19 August 2003). Available at <http://www.woodtv.com/Global/story.asp?s=1408944>.

hard-hit areas. Lee County, Florida obtained a waiver from USDA after Hurricane Charley to temporarily provide free school meals to all students in the county's public schools.⁵ USDA has also waived meal pattern requirements, allowing schools to serve meals that ordinarily would not meet nutritional guidelines because certain items, such as milk, were unavailable after the disaster.

The Child and Adult Care Food Program (CACFP)

In some cases, the Child and Adult Care Food Program, a federal program providing reimbursements for meals and snacks served to children in child care homes and centers, can continue to provide support even in a disaster situation. In the event of a disaster, state CACFP agencies can use an expedited waiver process to apply to USDA for permission to temporarily waive program requirements. USDA evaluates the waiver request to determine whether it is reasonable and necessary, consistent with the intent of the program, and protects the health and safety of the children in care. This process allows states to suspend or make more flexible program requirements that simply can not be met in a disaster including meal components, record keeping, enrollment and location requirements.

In the immediate aftermath of the September 11th attacks, some CACFP child care centers and family child care in New York City became a temporary home for the children in care and in some cases their parents. Transportation problems stranded children at child care centers and family child care homes, in some cases prevented parents from reaching their children and in others prevented parents from getting any further than the child care. To help support these CACFP child care centers and family child care, the New York State CACFP agency issued waivers allowing additional meals to be served, increasing the flexibility in meal component requirements to account for the lack of milk and other perishable items, eliminating the prohibition against residential child care and reducing the record-keeping requirements. In addition, New York State CACFP staff worked with anti-hunger advocates to connect the day care programs with emergency relief organizations.

When Florida was hit with back-to-back hurricanes last year, the state agency issued a waiver allowing CACFP child care centers that had survived the storms to accept and serve children from destroyed child care centers without requiring new CACFP enrollment forms. In addition, Florida waived the meal component requirements and allowed bottled water to count as a reimbursable expense. Some states have state disaster plans which include CACFP as part of a comprehensive response to disaster.

⁵ Breitenstein, Dave. "Students eat up free meals following Charley." *The News-Press*. (18 September 2004). <http://vh10066.v1.moc.gbahn.net/apps/pbcs.dll/article?AID=/20040918/NEWS0104/40918007/1006>

The Special Supplemental Nutrition Program for Women, Infants and Children (WIC)

In most low-income communities affected by a disaster the majority of pregnant women and infants and many of the young children (ages one through four) and new mothers will be WIC participants. In a disaster, it is crucial to preserve access to WIC, a federal program providing supplemental nutritious foods distributed monthly through WIC checks or coupons for specific food vouchers redeemable at a retail grocery.⁶

USDA's WIC Policy memorandum "WIC Disaster Policy and Coordination" provides guidance on how WIC should respond in disaster situations. State WIC agencies are strongly encouraged to prepare disaster plans assuring the continued delivery of WIC benefits and reaching potentially newly eligible individuals in the event of an emergency. Advocates should consider reviewing the state plan or offering to be part of an effort to create a plan if one doesn't exist. Without a pre-approved plan, the WIC state agency will have to seek approval during the disaster for all alternative procedures from USDA.

USDA strongly discourages the suspension of WIC services, because the program is regarded as an adjunct to health care and as such is considered a vital service in a disaster. There are a range of "alternate procedures" that state WIC agencies can employ to continue WIC services in a disaster including:

- Modifying WIC food package components to accommodate disaster conditions such as loss of refrigeration or unsafe drinking water, by issuing for example, ready-to-feed infant formula, UHT milk, or smaller packages of other food items.
- Replacing lost unredeemed WIC food vouchers, prorated for the remainder of the month. (WIC does not replace WIC food lost in a disaster.)
- Using mobile equipment to provide certification/issuance service to WIC participants in a disaster area.
- Simplifying income eligibility certification procedures by using automatic income eligibility of applicants who receive food stamps, Medicaid or TANF.
- Shifting to a direct WIC food distribution system, allowing WIC participants to receive food directly from WIC when the retail stores are out of commission. This strategy is generally used only after the initial mass distribution of Commodity Disaster Assistance.

⁶ WIC foods include infant formula, milk, cheese, eggs, iron fortified cereal, high vitamin C fruit juice, peanut butter and beans.

When Hurricane Andrew struck southeast Florida with a tremendous impact that left many people living in tent cities, Florida WIC set up temporary WIC sites in the tent cities and converted their usual WIC retail-purchase system to a direct distribution system, including ready-to-feed infant formula in single-serve bottles.

Administering the Disaster Food Stamp Program: Timelines and Key Players

The primary responsibility for requesting, planning and executing a DFSP rests with the state agency responsible for administering the Food Stamp Program. However, USDA headquarters, USDA regional offices, local food stamp offices, the Federal Emergency Management Agency (FEMA), other federal agencies, and advocacy organizations may and often should be involved as well.

Before a Disaster

All USDA regional offices are required to have a disaster plan, which is reviewed by USDA headquarters each year. The plan defines roles and lines of authority and lists current contact information for appropriate personnel. The regional offices also should conduct an annual disaster training meeting for program officials in the states in their regions, or at least maintain an annual check-in regarding disaster readiness.

State food stamp agencies also must have a disaster food stamp plan, which should include definitions of responsibilities, contact information for key personnel and private relief agencies, and procedures for informing the public about the program, preventing fraud, streamlining applications, training caseworkers, issuing benefits, and reviewing the disaster response after the fact.⁷ The FNS *Disaster Food Stamp Program Handbook* advises states to “establish working relationships and/or partnerships with other players involved in responding to disasters [in order to] increase the effectiveness of pre-disaster planning and disaster responsiveness.”⁸

Each state’s disaster food stamp plan must be approved by the Food and Nutrition Service (FNS). State food stamp agencies must review their disaster plans annually and submit any revisions to FNS by August 15th of each year. If states do not submit revisions, FNS assumes that the most recent disaster plan is current. Advocates who are interested in reviewing their state’s disaster plans should contact their USDA regional office.⁹

⁷ See the Food Stamp Act of 1977 as amended, Section 11(e), for this requirement. The text of the Food Stamp Act is available at <http://agriculture.senate.gov/Legislation/Compilations/FNS/FSA77.pdf>.

⁸ Food and Nutrition Service (1995). *Disaster Food Stamp Program Handbook*. FNS Handbook 320. p. 2-2. This handbook is not currently available online, but as of this report FNS is developing an updated handbook.

⁹ Regional disaster contacts are available at <http://www.fns.usda.gov/disasters/response/contacts.htm>.

Provisions for EBT service in a disaster situation must be negotiated in advance of a disaster with the state's EBT contractor. (Food stamp benefits in general are no longer delivered via coupons but electronically via a debit-like card for use at retail outlets.) States should consider planning an emergency manual voucher process and an expedited process for obtaining additional EBT cards in case either should become necessary.

When Disaster Strikes

Following a disaster, the President may, at the request of a state's governor, issue a declaration of a "major disaster."¹⁰ Intended for situations in which the state's capacity to provide emergency services is overwhelmed, the official declaration entitles the state to a broad range of federal assistance in relief efforts.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act authorizes the President to establish a DFSP following a disaster declaration, and Executive Order 12673 delegates this authority to the Secretary of Agriculture. This means that, following a presidential declaration of a disaster, USDA may conduct a DFSP without the President's further approval or involvement.

FEMA is charged with overall coordination of federal relief efforts in a presidentially-declared disaster, and FNS is the lead agency for food assistance under FEMA's leadership. Based on recent experience with the DFSP in New York and Florida, advocates have recommended efforts to increase FEMA's familiarity with the DFSP before a disaster and outreach on the DFSP after a disaster.¹¹

Although the majority of recent DFSPs have followed a presidential declaration of a major disaster, there is another statutory route for establishing a disaster program. The Food Stamp Act authorizes the Secretary of Agriculture to operate a DFSP at the request of a state, without requiring a presidential declaration of a major disaster.¹² However, the Food Stamp Act imposes an additional requirement for a DFSP under this route: commercial channels of food distribution must have been disrupted and subsequently restored. Indicators of disruption include: damaged transportation systems, hampered food deliveries, closure of retail food outlets for a significant period of time, reduced retail hours, reduced supplies that limit households' opportunity to purchase food, or a power failure that severely limits food outlets' operations. Commercial channels of food

¹⁰ See FEMA's "Guide to the Disaster Declaration Process and Federal Disaster Assistance," available at http://www.fema.gov/rrr/dec_guid.shtm.

¹¹ According to the Nutrition Consortium report, FEMA did not mention the DFSP specifically in its announcements on disaster assistance following the World Trade Center attacks. The report recommends that FEMA incorporate the DFSP in public announcements. In Florida, FEMA referred callers seeking food assistance to the hotline of the advocacy organization Florida Impact, rather than to the state food stamp agency. Close working relationships among FEMA, state food stamp agencies, and advocacy organizations before and after a disaster can greatly improve the efficiency and effectiveness of disaster food assistance.

¹² See the Food Stamp Act, section 5(h), available at <http://agriculture.senate.gov/Legislation/Compilations/FNS/FSA77.pdf>.

production are considered restored when conditions have improved enough that households have “reasonable access” to food outlets with “sufficient food supplies.”¹³

Whichever statutory route is invoked to authorize a DFSP, the process begins when USDA regional and field office personnel along with state officials conduct a damage assessment. The assessment collects facts on the extent and kinds of damage, determines what geographic areas are in need of assistance, and determines the viability of commercial food channels. Following the assessment, the state must evaluate its potential responses, including a DFSP, the regular FSP with waivers, and commodity distribution. As a recent memo from FNS regarding disaster preparedness notes, states can minimize the time needed to evaluate these options by having a thorough disaster plan in place before a disaster strikes.¹⁴

As the state evaluates its policy options, FNS assembles a Disaster Task Force, which includes senior FNS officials, representatives of the Food Stamp Program and other nutrition programs, and representatives from the USDA regional office(s) affected by the disaster. The Disaster Task Force oversees the disaster relief efforts from FNS headquarters and maintains contact with FEMA and the Department of Homeland Security.

If needed, FNS also sends a Disaster Assistance Response Team (DART) to the affected area. The DART includes federal staff with expertise in logistics, communications, and policy. The DART helps the state agency evaluate and negotiate DFSP details and provides a toolkit with handouts, applications, PR materials, checklists, and information on eligibility and verification requirements. FNS has also produced a *Disaster Food Stamp Program Handbook* (not yet available online) and an *EBT Disaster Plan Guide* for state agencies.¹⁵

If the state seeks authorization for a DFSP, it must submit an informal application to the regional USDA office by phone or fax within two weeks of the disaster, followed by a formal application in writing within 24 hours of the informal application. Of course, states normally should move as fast as possible, and not wait for up to two weeks. The formal application must include the date and type of the disaster, the geographic areas in need of assistance, a statement that a statutory prerequisite (presidential declaration or disrupted food distribution) has been fulfilled, a determination of how many low-income households are in need of assistance, and a recommended length of time for households to apply for assistance. The application must also describe security and crowd control plans, fraud control measures, application and issuance processes, and plans for notifying the public about the program.

¹³ Food and Nutrition Service (1995). *Disaster Food Stamp Program Handbook*. FNS Handbook 320.

¹⁴ See memo “FNS—Need to be Prepared for Requests for the Disaster Food Stamp Program,” from Clarence H. Carter, Deputy Administrator, Food Stamp Program, to FNS Regional Administrators, 23 June 2005. Available at <http://www.fns.usda.gov/fsp/rules/Memo/05/062305.pdf>.

¹⁵ The EBT Guide is available at http://www.fns.usda.gov/fsp/ebt/pdfs/disaster_guide_10_00.PDF.

The default length for a DFSP is a seven-day application period for households, and in most cases qualified households receive one month's worth of benefits. However, states may propose alternative application and benefit periods if reason exists for doing so. States may generate their own application forms for the disaster victims or use a template provided by FNS, but states may not make their eligibility criteria more restrictive than federal regulations.

Administering the DFSP

Once the application for a DFSP has been approved, the next step is to establish a command center and application and issuance sites. The command center may include staff from FEMA, FNS and the state agency, and is the coordinating hub for staffing, acquisition and distribution of supplies, and publicity. The command center also coordinates the DFSP's reporting systems, which help monitor the program and justify extensions if necessary.

The actual DFSP application and issuance sites are where most of the action happens. In the advent of a major disaster, local food stamp offices are unlikely to have the capacity to handle all of the potential new applicants, so additional or alternative sites may be selected on short notice. Schools, stadiums, piers, police stations, libraries, mobile vans, and rented trailers and tents all have served as application sites in the past. State officials should decide whether to co-locate the DFSP sites with FEMA and other emergency services, and whether to process new DFSP applicants and replacement benefit applicants together or separately. EBT cards may be issued immediately at the application site, by mail, or at a secondary issuance site such as a supermarket. States may use any of these issuance methods depending on which is most feasible in a particular disaster situation.

In planning the application and issuance sites, states should take measures to ensure the safety and comfort of applicants and maximize the efficiency of the process. Issues to consider include security, accessibility, capacity, and human comfort concerns, including water, restrooms, and the needs of elderly and disabled applicants. Signage and handouts can help applicants understand how the process works, what verifications are required, and what other resources may be available. Planners can improve service by designating staff or volunteers to answer questions, spot language issues, help applicants who cannot read or write, and screen applications for completeness and verification prior to the interview phase. State agencies should also try to provide immediate, on-site supervisory review for the cases of denied applicants.

Due to the potentially large number of applicants in a disaster area, state agencies should prepare to have additional staff and volunteers on hand. State, USDA regional and field office staff, field staff from non-affected areas, and temporary hires all can help fill staffing needs. All staff will need to be trained in the DFSP provisions, fraud prevention measures, public relations and personnel matters. Experience from past disasters suggests that each

interviewer can process approximately six applicants per hour, and one food stamp issuance clerk is needed for every nine to ten interviewers. Volunteers can help walk applicants through the process and help address human comfort concerns.

Concluding the DFSP

As the initial application period ends—usually after about seven days—the state agency should decide, based on how many people remain to be served, whether to continue the DFSP. States may extend the application period, the benefit period, or the geographic area of the program by submitting an informal and then a formal application, as described previously.

When the DFSP ends, states may also transition to the regular program with waivers if conditions warrant. For example, a state may experience or anticipate an administrative backlog in the regular Food Stamp Program after devoting workers and resources to the disaster effort. The state could apply to extend certification periods—increasing the length of time after which regular cases must be recertified, thus reducing the number of recertifications needed in the immediate aftermath of the disaster—to ease the administrative burden on caseworkers.

It is also worth noting that many people who receive DFSP benefits will be eligible for regular Food Stamp Program benefits over the longer term. This may be because they already were eligible before the disaster but had not applied, or because the disaster has adversely affected their income or resources. Advocates should make sure the state is taking steps (outreach; efforts to continue benefits by transitioning recipients from the DFSP to the regular benefits) to get these needy families and individuals into the regular Food Stamp Program.

The state must submit to FNS daily reports from each issuance site and a final Report of Disaster Issuance (form FNS-292) at the conclusion of the DFSP. The daily reports must include the number of households and persons approved, the number of households denied, the value of benefits approved, and the average benefit per household, all broken down by new and existing cases. The state agency also must select a one percent sample of cases and conduct an error analysis. Errors in the DFSP do not count against a state's general food stamp error rate for the purposes of awarding high performance bonuses or assessing liabilities for excessive error rates.¹⁶ The results of the error analysis, combined with the state's experience with the disaster program, may lead to amendments of the state DFSP plan.

¹⁶ However, states are not excused from higher error rates in the regular FSP that may arise as a byproduct of the extra administrative burden of a DFSP. For that reason, states affected by disasters should seriously consider requesting waivers that extend certification periods in the regular FSP or provide other administrative relief.

Eligibility and Benefits

This section details the eligibility criteria for and benefits of the DFSP. The eligibility criteria apply to persons who are not currently receiving food stamps. As noted above, existing food stamp participants are eligible for replacement benefits if they lose food or benefits in the disaster. Since those households have already met the generally more stringent eligibility requirements of the regular Food Stamp Program, they need only report their lost food or EBT card to be eligible for replacement benefits.

Income and Resource Test

To qualify for disaster food stamps, a household must meet the DFSP income and resource test. The household's income during the disaster period, plus its accessible liquid resources, less a deduction for its expected disaster-related expenses, must not exceed the disaster gross income limit. (See worksheet in Appendix 4.)

One key element here is that the resources counted are only accessible liquid resources (the assets test in the regular Food Stamp Program is generally more onerous). Accessible liquid resources include cash and checking and savings accounts, but do not include disaster insurance payments or other disaster assistance.

The deduction from income includes disaster-related expenses not expected to be reimbursed during the DFSP benefit period, such as repairs, temporary shelter, evacuation expenses, protection of home or business, or hospital or funeral expenses. The disaster gross income limit—shown in the chart on this page—for a given household size is equal to the sum of three maximums for the regular FSP: the maximum monthly net income limit plus the maximum standard income deduction plus the maximum excess shelter expense deduction.

Disaster Gross Income Limit (48 States & DC, FY05)	
Persons in Household	Income Limit
1	\$1,298
2	\$1,563
3	\$1,828
4	\$2,093
5	\$2,377
6	\$2,664
7	\$2,929
8	\$3,194
each additional person	\$265

Other Eligibility Requirements

To be eligible for the DFSP under USDA policy, applicants must reside in the disaster area (defined in the presidential disaster declaration or DFSP waiver request) at the time of the disaster.¹⁷ Working but not residing in the area is not sufficient. Applicants must plan to

¹⁷ Advocates have pointed out in past disasters that the geographic eligibility criteria FNS imposes have shortcomings. For example, the Nutrition Consortium report notes that the official disaster area following the attacks on the World Trade Center was Manhattan below 14th Street. The problem with this designation was that an individual who worked in lower Manhattan and lost his or her job but lived in New Jersey would

purchase food during the disaster benefit period. In addition, applicants must have experienced at least one of the following adverse effects: a loss of food or EBT card; damage to or destruction of their home or self-employment business; disaster-related expenses as described above; lost or inaccessible income, including a reduction, termination or delay of income; or inaccessible liquid resources. There has reportedly been some debate as to whether food loss alone should qualify a household for the DFSP if it is the only hardship experienced by the household as a result of the disaster. FNS has ruled that state agencies may decide for each individual disaster whether food loss alone is sufficient or whether households must experience other disaster-related losses to be eligible.¹⁸ Advocates should encourage their states to deem food loss alone to be a basis for disaster food stamp aid. After all, the core purpose of the program is to meet food needs.

DFSP Rules Broader than the Regular Food Stamp Program

A number of requirements for the regular Food Stamp Program are dropped for the DFSP. An applicant's citizenship or alien status does not affect eligibility for the DFSP, and applicants are not required to provide Social Security numbers. There are no special restrictions on students or strikers for the disaster program, nor are there any work or training requirements. Those who are disqualified from the regular Food Stamp Program for Intentional Program Violations (IPVs), such as falsely reporting income or resources on a food stamp application, generally may participate in the disaster program. However, an IPV in the disaster program does count against eligibility for the regular program.

Verification

The DFSP verification requirements are considerably relaxed in comparison with those of the regular Food Stamp Program. Only verification of identity is absolutely mandatory, and a signed affidavit from a collateral contact is sufficient verification for those who lack identification or lost it in the disaster. Residency and loss or inaccessibility of income or liquid resources are verified where possible. Household composition and food loss are verified only if questionable.

Benefits

The maximum disaster benefit is equal to the maximum monthly allotment under the regular Food Stamp Program for a given household size. (See chart on next page.) Households that are not currently food stamp recipients but are approved for disaster benefits receive the maximum disaster benefit.

be ineligible for disaster benefits, while an individual who lived below 14th Street and kept his or her job might be eligible. The Nutrition Consortium report points out that geographic eligibility criteria are not required by statute; however, FNS generally expects states to have a defined area for assistance.

¹⁸See memo "FNS—Food Loss as an Eligibility Factor for the Disaster Food Stamp Program," from Clarence H. Carter, Deputy Administrator, Food Stamp Program, to FNS Regional Administrators, 5 May 2005. Available at <http://www.fns.usda.gov/fsp/rules/Memo/05/050505.pdf>.

For households already in the regular program, states usually determine a uniform replacement amount (e.g. one month's or one half of one month's benefits), which may be added automatically to all clients' EBT cards, or only to those who come into the disaster application site to report lost food.¹⁹ Some existing food stamp recipients may need more assistance than they had received previously, as might occur if they faced significant disaster-related expenses or a termination of income. In those cases, already participating food stamp recipients may be eligible for both replacement benefits and a supplemental benefit up to the difference between the maximum disaster benefit and their usual benefit.

Maximum Disaster Benefit (48 States & DC, FY05)	
Persons in Household	Maximum Benefit
1	\$149
2	\$274
3	\$393
4	\$499
5	\$592
6	\$711
7	\$786
8	\$898
each additional person	\$112

Appendix 3 lists the total food stamp benefits issued after several recent disasters. After the 2004 hurricanes in Florida, for example, the average household in the disaster food stamp program received \$252 in disaster benefits, or \$98.17 per person.²⁰ Households already receiving food stamps received an average of \$142.78 in replacement benefits and supplemental disaster benefits. New households received an average of \$372.08 in disaster benefits.

Eligible households must receive their benefits within three days of the approval of their application. As in the regular Food Stamp Program, all benefits must be issued by EBT card. In the event of a prolonged loss of power or telephone connection, a manual voucher process may be used until those services are restored.

In most cases, all of the normal rules governing what recipients may buy with food stamps apply to disaster food stamps as well. Under some circumstances—for example, if many households suffer damage to their homes and are unable to cook at home—states may seek a waiver to allow recipients to use the food stamps for hot prepared foods, which are usually allowed in the regular program only for certain homeless, elderly or disabled recipients. In those cases, disaster food stamp recipients would be able to purchase prepared foods at stores that are authorized to provide food (at reduced prices) to homeless, elderly or disabled recipients under the regular Food Stamp Program.

¹⁹ In past disasters some states have combined automatic replacement benefits in the hardest-hit areas with on-request replacement benefits in other areas. For example, after Hurricane Isidore in 2002 Louisiana provided automatic replacement benefits to food stamp recipients in 11 parishes, and food stamp recipients in 18 other parishes were eligible for replacement benefits if they came in and reported lost food.

²⁰ Since the chart includes full DFSPs as well as disasters where only already participating households received disaster benefits, average benefits may not necessarily be comparable across different disasters.

How Advocates Can Make a Difference

Advocates can play a critical role in helping low-income people recover from disasters. This section suggests a few of the ways in which advocates can support and improve emergency food assistance following a disaster. See also Appendix 1 for FRAC's checklist of ten key ways in which advocates can help disaster food relief efforts.

Download this Guide and Other Documents Now

In the event of a disaster, you may not have power or an internet connection, and it would be very helpful to have hard copies of disaster-related materials in those circumstances. If you are reading this guide online, download and print it, along with other important documents such as disaster contacts and outreach plans.

Don't Wait Until a Disaster Hits

Talk with your state now about its disaster preparedness, including who would be your liaison for information on food stamp relief in the event of a disaster. Developing a constructive relationship with state and local food stamp agencies can be more difficult in the chaotic and fast-moving days following a disaster. Advocates who have regular meetings or working groups with state food stamp officials could bring up the topic of disaster plans at those meetings.

Influence the Disaster Response

The Food Stamp Act and the Stafford Act give state agencies and USDA a great deal of flexibility in how they respond to disasters. State agencies have a wide array of options as they apply for disaster waivers, and the pace of their response is critical as well. Advocates should engage with states to ensure that the disaster response reaches as many people as possible as quickly as possible. Advocates should stress that food stamp administrators can make life easier for caseworkers, as well as their clients, by seeking broad eligibility criteria and streamlined application and issuance processes. For example, an automatic issuance of replacement food stamps for existing clients not only saves many clients a trip to the food stamp office, it also saves administrative money and caseworker time. (As in the regular FSP, DFSP benefits are fully federally funded and administrative costs are shared nearly equally by the state and federal governments.)

One point to emphasize in advocating for disaster food stamp benefits is that a DFSP not only helps low-income people get through a difficult period, it also helps the local economy recover. Food stamp benefits become revenues for local retailers, generating a "multiplier effect" as the dollars cycle through the local economy. USDA researchers have estimated that, under certain conditions, \$1 in federal food stamp benefits generates approximately

\$1.80 in economic activity.²¹ Disaster relief more generally has begun to emphasize relief in the form of immediate purchasing power, like cash or EBT-based benefits, rather than in-kind donations, in part because it enables disaster victims to purchase what they need most but also because such relief helps local economies to recover from disasters. For example, the Red Cross in 2003 adopted a Client Assistance Card, which works like a debit card and enables recipients to purchase supplies they need to begin rebuilding their lives.²²

Food bankers often work closely with federal, state and local officials in distributing commodity relief in a disaster. They are well-positioned also to alert officials and other partners to the best practices in expediting disaster food stamp assistance and helping to incorporate information about disaster food stamps in communications with the public.

Advocate for Clients After the Program Is Under Way

In times of heightened stress and confusion following a disaster, states may be too slow to adopt DFSP programs, or, inevitably, officials will need help in identifying problems or clients whose needs are not being served. Following the 2003 blackout, End Hunger Connecticut! was unable to convince the state to provide automatic replacement food stamps, but was able to advocate successfully for clients who missed the usual ten-day deadline for reporting lost food. Also during the blackout, the Nutrition Consortium of New York State was informed that one county was denying replacement food stamps to clients who lost power for only six hours. By citing USDA food safety guidelines, which indicate that potentially hazardous food should be discarded after four hours without refrigeration, the Consortium persuaded the county that those clients were in need of replacement benefits.

Conduct DFSP Outreach

Advocates can play a central role in outreach efforts following a disaster. Due to the huge influx of applicants, state and local food stamp offices are unlikely to have a great deal of time, personnel or administrative resources to devote to outreach. Outreach plans should take into account the kind of disaster assistance offered, which populations are most likely to need help, and which channels of communication are most likely to reach those people. Advocates should be prepared to use any and all of their normal outreach channels, such as congregations and faith-based service agencies, organizations representing ethnic or immigrant groups, emergency food and shelter providers, child care providers, after-school and summer programs, other non-profits, supermarkets, community centers, and other

²¹ See Hanson, Kenneth and Elise Golan. (2002) "Effects of Changes in Food Stamp Expenditures Across the U.S. Economy." (Food Assistance and Nutrition Research Report Number 26-6). Available at <http://www.ers.usda.gov/publications/fanrr26/fanrr26-6/fanrr26-6.pdf>.

²² Guy, Eilene. "Better Red Cross Service is in the Cards." (8 October 2003). Available at http://www.redcross.org/article/0,1072,0_507_1747,00.html.

public gathering places. To the extent possible, advocates should provide information about other disaster benefits, such as disaster Medicaid.

Outreach efforts should be geared toward current food stamp recipients who are eligible for replacement or supplemental disaster benefits and not just toward those who are newly eligible for food assistance as a result of the disaster. Even if a state opts for automatic replacement benefits, outreach is still necessary because recipient households will not use the benefits if they do not know they have them, i.e., they have not been told that benefits have been added to their EBT cards. In areas where there are not automatic replacement benefits, advocates will need to conduct aggressive outreach to help ensure that eligible households report their food loss in a timely fashion.

Food bankers, advocates, and state and local elected officials also can help potential beneficiaries become aware of the DFSP by pressing for media attention for the program. Insufficient publicity of the DFSP has been a shortcoming cited by some advocates involved with recent disaster programs. The Nutrition Consortium report states that neither New York City nor the state nor FEMA actively publicized the DFSP after the September 11th attacks. That report recommends that disaster relief announcements mention disaster food stamps specifically, not just assistance in general.

Elected officials can play pivotal roles in encouraging the state to operate a broad DFSP as well as in publicizing the available benefits to their constituents. In cities, a press release or announcement from a mayor or city council member can significantly increase awareness of the program. The National League of Cities helped to get out the word about disaster food stamps to mayors in states affected by the 2003 power outages. The NLC “Cities Weekly” also featured an article co-authored with DC Hunger Solutions about how city officials and advocates worked together to leverage food stamp assistance for those affected by Hurricane Isabel.²³

In addition to conducting planned outreach, advocates should be prepared for a much greater volume of clients contacting them for help. During the 2004 hurricanes in Florida, for example, the Tallahassee-based advocacy group Florida Impact was deluged with phone calls from disaster victims in need of food assistance. Since state hotlines are likely to be overwhelmed with callers, advocates can be a crucial additional source of timely information on disaster benefits.

Help Clients Transition from the DFSP to the Regular Food Stamp Program

The DFSP is, by definition, a short-term program. While a DFSP benefit period typically ends after about 30 days, some households continue to be in need of food assistance thereafter, perhaps due to a disaster-related loss of employment or ongoing expenses. In

²³ Perry, Kim and Abby Hughes Holsclaw. “D.C. Officials Help Secure Post-Hurricane Emergency Food Stamps.” *Cities Weekly*. (27 October 2003). Available at http://oldweb.nlc.org/nlc.org/site/newsroom/nations_cities_weekly/display3.cfm?id=F3F576D4-47CE-41C7-951AAD8FBF03D88E.

addition, it is likely that many households which receive disaster food stamp assistance were eligible for the regular Food Stamp Program prior to the disaster but were not participating.²⁴ Ideally, state agencies and advocates should plan in advance to assist households in the transition from the disaster program to the regular program.

Since providing information about the regular Food Stamp Program at disaster application sites may cause unnecessary confusion about what clients should do in the short term, better strategies may entail follow-up with disaster assistance households after the emergency program is over. Contacting households after the disaster, while essential, also poses unusual challenges. As the Nutrition Consortium report notes, some households may experience “unstable living environments” after a disaster, and addresses provided on disaster applications may not be valid over time. Another post-disaster approach is to seek local media coverage of the regular Food Stamp Program after the disaster, perhaps profiling a family that received disaster assistance and then connected with the regular program. Once again, states and advocates should tailor their post-disaster outreach efforts to their particular circumstances.

No one would wish for a disaster, but the heightened attention to food stamps during a disaster can help eligible but nonparticipating families connect with the regular Food Stamp Program. According to the *Montgomery Advertiser*, officials in Alabama attributed an increase in regular FSP enrollment to Hurricane Ivan, which struck in September 2004. From January 2004 to January 2005, food stamp payments in three affected counties increased by 18 percent, while unemployment in the area remained virtually unchanged.²⁵ This experience indicates that the DFSP can reach low-income households that ordinarily would not have known they were eligible for food stamps.

Recognize a Job Well Done

Federal, state and local food stamp agencies deserve credit and recognition for what they do well, especially under the extremely difficult circumstances of a disaster. Letters to appropriate officials, op-ed pieces, and press releases are among the ways of providing this recognition. Advocates may also consider nominating local food stamp offices providing outstanding disaster service for a Hunger Heroes award from the Food Stamp Outreach Coalition. The Coalition is “a national group of interested organizations and individuals that provide a forum for the sharing of outreach ideas, strategies, and resources in order to improve the accessibility of the Food Stamp Program and increase participation by eligible persons.” Each year the Coalition selects two local food stamp offices that “provide exemplary service in assisting eligible clients [to] obtain food stamps.”²⁶ Praising effective

²⁴ According to the most recent estimate from FNS, only 54 percent of people who are eligible for the Food Stamp Program nationwide are participating in the program. Most eligible but nonparticipating households are unaware that they are eligible for food stamp benefits. See Castner, Laura A. and Allen L. Schirm. (2005) “Reaching Those in Need: State Food Stamp Participation Rates in 2002.” Available at <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2002.pdf>.

²⁵ Linn, Mike. “Ivan’s wake fuels food stamp program.” *Montgomery Advertiser*. (14 March 2005).

²⁶ See the Hunger Heroes webpage, available at <http://www.fns.usda.gov/fsp/outreach/heroes.htm>.

disaster relief efforts can help cement good relationships between advocates and food stamp agencies long after the disaster is over. Media attention to the positive contributions the DFSP makes to people and communities affected by a disaster also bolsters public awareness, confidence and support for the Food Stamp Program.

Conclusion

A main strength of the Food Stamp Program is its ability to respond to changes in need in a timely fashion, whether those changes are precipitated by economic downturns or disaster situations. By making use of the broad policy options available under the Disaster Food Stamp Program, federal, state, and local officials can maximize nutrition assistance for needy families affected by disasters. The infusion of federal disaster food stamp benefits also can assist local economies hit hard by disasters. As noted above, each dollar in federal food stamp spending generates nearly twice that amount in economic activity.

Planning and preparation for disasters are essential not only for food stamp officials, but also for advocates for low-income people. By becoming familiar with DFSP rules and policy options, developing positive working relationships with food stamp officials, and acting quickly when a disaster strikes, advocates can help ensure that low-income people receive the food assistance they need at such precarious times.

Links and Resources

Federal Statute:

The Food Stamp Act of 1977, as amended [disaster program authorized in Sections 5(h) and 11(e)(14)]: <http://agriculture.senate.gov/Legislation/Compilations/FNS/FSA77.pdf>

The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, sec. 412: <http://www.fema.gov/library/stafact.shtm#sec412>

Federal Regulations:

Replacement issuance of food stamps [7 CFR §274.6]:
<http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?TITLE=7&PART=274&SECTION=6&TYPE=TEXT>

Disaster procedures [7 CFR §280.1]:
<http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?TITLE=7&PART=280&SECTION=1&TYPE=TEXT>

Federal Resources:

USDA Food and Nutrition Service disaster assistance main page [includes disaster FAQ, information on disaster relief programs, and food safety information]:
<http://www.fns.usda.gov/disasters/disaster.htm>

Federal Emergency Management Agency (FEMA) webpage: <http://www.fema.gov/>

FNS memo with recommendations to improve state preparedness for the DFSP:
<http://www.fns.usda.gov/fsp/rules/Memo/05/062305.pdf>

USDA national and regional disaster contacts:
<http://www.fns.usda.gov/disasters/response/contacts.htm>

Food Stamp EBT Disaster Plan Guide:
http://www.fns.usda.gov/fsp/ebt/pdfs/disaster_guide_10_00.PDF

USDA Food and Nutrition Service page on disaster commodity distribution:
<http://www.fns.usda.gov/fdd/programs/fd-disasters/default.htm>

Information on past disaster programs:

Summary of disaster food stamp assistance since 1996:

http://www.frac.org/pdf/dfsp_chart.pdf

Nutrition Consortium of New York State's report on the DFSP in the aftermath of the 2001 World Trade Center attacks:

<http://www.hungernys.org/programs/publications/disaster.html>

Food Research and Action Center's webpage on 2004 hurricane disaster relief:

http://www.frac.org/html/federal_food_programs/FSP/Hurricane_2004.html

The *Florida Sun-Sentinel* reports on low-income children going hungry after a hurricane closed schools:

<http://www.sunsentinel.com/news/local/southflorida/orlasechhunger20082004aug20.1.2022474.story?ctrack=1&cset=true>

The *News-Press* in Florida reports on the free school meals waiver in Lee County, FL following Hurricane Charley:

<http://vh10066.v1.moc.gbahn.net/apps/pbcs.dll/article?AID=/20040918/NEWS0104/40918007/1006>

Press release from the Florida Department of Children and Families announcing that September 2004 food stamp and Temporary Cash Assistance allotments would be released early in preparation for Hurricane Frances:

http://www.frac.org/html/federal_food_programs/FSP/Hurricane_FL_DCF_Press_Release.pdf

Article on automatic replacement benefits for food stamp recipients in Michigan counties affected by the 2003 blackout: <http://www.woodtv.com/Global/story.asp?s=1408944>

Article on automatic replacement benefits in Washington, DC after Hurricane Isabel:

http://oldweb.nlc.org/nlc_org/site/newsroom/nations_cities_weekly/display3.cfm?id=F3F576D4-47CE-41C7-951AAD8FBF03D88E

Press release from the New York City Coalition Against Hunger on replacement benefits after the 2003 blackout: <http://www.frac.org/pdf/blacoutreplace.PDF>

Sample Outreach Materials:

Flyer from the Center for Civil Justice in Michigan:

<http://www.frac.org/pdf/NopowerNofood.PDF>

Benefits Guide from the New York Immigration Coalition for those affected by the World Trade Center disaster [DFSP information on page 11]:

<http://www.itapnet.org/chri/resources/911resourcekit/wtcbenefitsguide.doc>

State DFSP Manuals:

Illinois Department of Human Services Policy Manual on DFSP:

<http://163.191.134.21/pmwig/Web%20Files/PM%20and%20WAG/output/PM06109.html>

Iowa DHS Employees' Manual on DFSP:

http://www.dhs.state.ia.us/policyanalysis/PolicyManualPages/Manual_Documents/Master/7-l.pdf

Nevada State Welfare Division's Eligibility and Payments Manual on DFSP:

http://www.welfare.state.nv.us/elig_pay/epm_manual/d_0200.pdf

North Carolina Department of Health and Human Services:

<http://info.dhhs.state.nc.us/olm/manuals/dss/ei-70/man/FSDM-02.htm>

Appendix 1: FRAC's Ten Key Ways Food Stamp Advocates Can Help Low-Income People in a Disaster

✓	1. Develop a constructive relationship with your state and local food stamp offices <i>before</i> a disaster strikes.
✓	2. Ask your state about its disaster plans, or bring up disaster readiness at regular meetings or working group sessions.
✓	3. Encourage your state to apply as quickly as possible for a DFSP when a disaster occurs, and monitor its progress during the application process.
✓	4. Encourage your state to ask for automatic replacements for existing recipients, broad eligibility criteria for new recipients, and food loss as a sufficient criterion for assistance.
✓	5. Enlist the help of the local food bank community and a broad range of other non-profit organizations to promote the DFSP.
✓	6. Press local elected officials, the media, and FEMA to mention the DFSP specifically, not just assistance in general.
✓	7. Use all of your normal outreach channels and methods to inform people about the DFSP, and think of new channels and methods as the disaster situation requires.
✓	8. Advocate for clients who fall through the cracks of the disaster relief efforts.
✓	9. Work with your state to develop a plan to help DFSP recipients who might be eligible for the regular Food Stamp Program to apply for benefits.
✓	10. When the disaster effort is over, recognize your state for what it did well and make constructive suggestions for future disaster relief efforts.

Appendix 2: Disaster Food Stamp Legislation

The Food Stamp Act of 1977, as amended

Section 5

(h) Temporary emergency standards of eligibility; Food Stamp Disaster Task Force; direct assistance to State and local officials

(1) The Secretary shall, after consultation with the official empowered to exercise the authority provided for by sections 402 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 USC 5121 et seq.), establish temporary emergency standards of eligibility for the duration of the emergency for households who are victims of a disaster which disrupts commercial channels of food distribution, if such households are in need of temporary food assistance and if commercial channels of food distribution have again become available to meet the temporary food needs of such households. Such standards as are prescribed for individual emergencies may be promulgated without regard to section 4(c) of this act or the procedures set forth in section 553 of title 5 of the United States Code.

(2) The Secretary shall -

(A) establish a Food Stamp Disaster Task Force to assist States in implementing and operating the disaster program and the regular food stamp program in the disaster area; and

(B) if the Secretary, in the Secretary's discretion, determines that it is cost-effective to send members of the Task Force to the disaster area, the Secretary shall send them to such area as soon as possible after the disaster occurs to provide direct assistance to State and local officials.

(3) (A) The Secretary shall provide, by regulation, for emergency allotments to eligible households to replace food destroyed in a disaster. The regulations shall provide for replacement of the value of food actually lost up to a limit approved by the Secretary not greater than the applicable maximum monthly allotment for the household size.

(B) The Secretary shall adjust issuance methods and reporting and other application requirements to be consistent with what is practicable under actual conditions in the affected area. In making this adjustment, the Secretary shall consider the availability of the State agency's offices and personnel, any conditions that make reliance on electronic benefit transfer systems described in section 7(i) of this title impracticable, and any damage to or disruption of transportation and communication facilities.

Section 11

- (e) The State plan of operation required under subsection (d) of this section shall provide, among other such provisions as may be required by regulation—
- ...(14) that the State agency shall specify a plan of operation for providing food stamps for households that are victims of a disaster; that such plan shall include, but not be limited to, procedures for informing the public about the disaster program and how to apply for its benefits, coordination with Federal and private disaster relief agencies and local government officials, application procedures to reduce hardship and inconvenience and deter fraud, and instruction of caseworkers in procedures for implementing and operating the disaster program;

The Robert T. Stafford Act Disaster Relief and Emergency Assistance Act, as amended:

Section 412. Food coupons and distribution

(a) Persons eligible; terms and conditions

Whenever the President determines that, as a result of a major disaster, low-income households are unable to purchase adequate amounts of nutritious food, he is authorized, under such terms and conditions as he may prescribe, to distribute through the Secretary of Agriculture or other appropriate agencies coupon allotments to such households pursuant to the provisions of the Food Stamp Act of 1964 (Pub.L 91-671; 84 Stat. 2048) [7 U.S.C. 2011 et seq.] and to make surplus commodities available pursuant to the provisions of this chapter.

(b) Duration of assistance; factors considered

The President, through the Secretary of Agriculture or other appropriate agencies, is authorized to continue to make such coupon allotments and surplus commodities available to such households for so long as he determines necessary, taking into consideration such factors as he deems appropriate, including the consequences of the major disaster on the earning power of the households, to which assistance is made available under this section.

(c) Food Stamp Act provisions unaffected

Nothing in this section shall be construed as amending or otherwise changing the provisions of the Food Stamp Act of 1964 [7 U.S.C.A. 2011 et seq.] except as they relate to the availability of food stamps in an area affected by a major disaster.

Note: the President's authority in this section was delegated to the Secretary of Agriculture by Executive Order 12673.

Appendix 3: Data on Selected Disaster Food Stamp Assistance, 2001-2004

This chart summarizes all disaster Food Stamp assistance with total benefits of \$1 million or more from 2001 to 2004. When the data are available, caseload and benefits totals are disaggregated into existing households (those receiving replacement and in some cases supplemental disaster benefits) and new households. See FRAC's posting (http://www.frac.org/pdf/dfsp_chart.pdf) for a complete list of disaster programs since 1996. Since the chart includes full DFSPs as well as disasters where only already participating households received disaster benefits, average benefits may not necessarily be comparable across different disasters.

State*	Disaster	Application Period	Benefit Period	Caseload (households)	Benefits Issued
FL	Hurricanes Ivan, Frances, Charley and Jeanne	9/9-10/31/04	1 month; 1-3 month extension to some HHs	909,975 Existing: 476,519 New: 433,456	\$229,317,876 E: \$68,038,463 N: \$161,279,413
AL	Hurricane Ivan	9/14-10/13/04	1 month	138,804 Existing: 82,943 New: 55,861	\$37,031,270 E: \$16,397,167 N: \$20,634,103
NC	Hurricane Ivan	9/26-9/30/04	1 month	18,814	\$5,202,246
VA	Hurricane Isabel	7 days	1 month	194,331 Existing: 57,205 New: 137,126	\$56,080,202 E: \$4,660,897 N: \$51,419,305
DC	Hurricane Isabel	9/26-10/6/03	1 month	54,227 Existing: 43,101 New: 11,126	\$7,276,397 E: \$3,891,718 N: \$3,384,679
MD	Hurricane Isabel	10/1-10/9/03	1 month	59,033	\$5,829,439
NC	Hurricane Isabel	9/26-9/30/03	1 month	23,557	\$9,285,087
MI	Blackout (8/03)	N/A (automatic replacement)	½ month	159,905	\$14,366,480
TN	Windstorm	8/6-8/9/03	½ month	9,100	\$3,100,000
NC	Ice storm	12/13-12/21/02	½ month	50,515	\$5,684,544
LA	Hurricane Isidore	10/1-11/15/02	1 month	23,280	\$6,240,289
AZ	Forest fire	7/1-7/10/02	10 days	4,286	\$1,048,825
WV	Flash flood	5/2-5/31/02	1 month	7,611	\$2,057,123
OK	Ice storm	2/22-2/28/02	1 month	26,072	\$7,405,207
NY	World Trade Center Attacks	9/14-10/31/01	1 month	16,668	\$4,100,573
OK	Ice storm and freeze	1/16-1/24/01	1 month	138,787	\$13,687,562

*The DFSP rarely covers an entire state; typically, the program takes place in select parts of states.

Appendix 4: Disaster Eligibility Worksheet

DFSP Income and Resource Test: the household's income during the disaster period, plus its accessible liquid resources, less a deduction for its expected disaster-related expenses, must not exceed the disaster gross income limit. The disaster gross income limit equals the maximum monthly net income limit for the regular FSP plus the maximum standard income deduction plus the maximum excess shelter expense deduction.

The household in the example below has four persons and expects to receive \$1,900 in income during the one-month benefit period. The household head has \$100 in her checking account and \$350 in her savings account. Following the disaster, the household incurs costs of \$200 for roof repairs and \$400 for out-of-pocket hospital expenses. As the calculation below shows, this household is eligible for disaster food stamps.

Disaster Gross Income Limit (48 States & DC, FY05)	
Persons in Household	Income Limit
1	\$1,298
2	\$1,563
3	\$1,828
4	\$2,093
5	\$2,377
6	\$2,664
7	\$2,929
8	\$3,194
each additional person	\$265

	<i>Example</i>			
The household's income (actual or expected) during the disaster period...	\$1,900			
... plus its accessible liquid resources (checking and savings only; disaster-related cash assistance does not count)...	\$450			
... minus a deduction for its expected disaster-related expenses (not expected to be reimbursed during the benefit period)...	– \$600			
(TOTAL of first 3 lines)	\$1,750			
...must not exceed the disaster gross income limit for the household size.	\$2,093			