



**Guide to
Federal Nutrition Programs
During Disasters**

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About FRAC

The Food Research & Action Center (FRAC) improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions.

Acknowledgments

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For more information about federal nutrition programs, visit FRAC's website at [frac.org](https://www.frac.org).

Introduction

The best time to read this guide is before a disaster takes place. Unfortunately, the country has seen an increase in disasters such that they are no longer a seasonal issue — natural disasters are the new normal. It is also normal for these disasters to involve losses exceeding \$1 billion.¹ The personal and financial toll disasters take on communities is devastating, and local advocacy and agency workers involved with recovery efforts also may be working through their own stress and trauma.

August 29, 2005, opened the floodgates on a new era of natural disasters. Hurricane Katrina barreled into the U.S. Gulf Coast, leaving terrible devastation in its wake and approximately \$200 billion in losses.² The storm leveled homes, businesses, and property near the water and inland for miles. The human toll of Hurricane Katrina was also tremendous with more than 1,800 lives lost during and after the hurricane.³ Over three-quarters of a million people were forced to flee their homes⁴, relocating all over the country, and 10 months after the storm, repopulation estimates for Orleans parish (i.e., county) continued to hover around a mere 40 percent.⁵ Hurricane Katrina also exposed the longstanding and widespread problems of hunger and poverty that disproportionately affect communities with low incomes. Prior to the storm, close to one-quarter (23.2 percent) of New Orleans residents were impoverished, and the city's rate of childhood poverty was more than double the national average (38.1 percent as compared to 18.4 percent).⁶ Ironically, those with the least to lose were the ones who lost the most.

While Hurricane Katrina was uniquely catastrophic, each year, many lesser, albeit frequent, disasters can and do cause death or injury, wreck personal property, cut access to financial resources, break off links to human services programs, interrupt employment, or result in sudden medical expenses. Any of these misfortunes may precipitate a crisis for communities with low incomes. In recognition of the need to assist people with low incomes 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 Food and Nutrition Service (USDA FNS) broad authority to provide emergency food relief after disasters. The cornerstone of that federal nutrition assistance in a disaster scenario is the Disaster Supplemental Nutrition Assistance Program (D-SNAP).⁷ The federal child nutrition program Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the distribution of commodity foods, also play important roles in assisting people hit hard by disaster.

Advocates, agency workers, public officials, businesspeople, and individuals should be aware of the potential for SNAP and other federal nutrition benefits to expedite and strengthen the response to disasters of various types. In the past, D-SNAP has provided relief after flooding in North Carolina, forest fires in California, a tornado in Iowa, windstorms in Tennessee, a black out in Michigan, ice storms in Oklahoma, and terrorist attacks in New York City. In the case of the 2017 Atlantic hurricanes (Harvey, Irma, and Maria), over 3.2 million households were served throughout Texas, Florida, and the U.S. Virgin Islands, through D-SNAP and supplemental benefits.⁸

D-SNAP provides replacement benefits for current SNAP recipients who lose food in a disaster⁹ and extends benefits to many households that would not ordinarily be eligible for SNAP, but suddenly need, food assistance. To ease the administrative burden on states, D-SNAP typically includes temporarily relaxed verification and reporting requirements for the state's ongoing case-processing activities. Like regular SNAP, D-SNAP is a state-administered program with fully federally funded benefits that provides an economic boost to hard-hit communities.

In the aftermath of a disaster, there is usually a need for new and urgent assistance for households with low incomes. Advocates can play a critical role in helping their state and USDA move quickly to implement D-SNAP by:

- distributing information about disaster benefits,
- assisting with outreach to vulnerable populations, and
- encouraging state agencies to design their relief efforts to reach as many individuals 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 a disaster strikes.

This guide explains how federal nutrition programs work during disasters and what advocates, elected officials, and programs service providers can do to help meet nutrition needs before, during, and after a disaster. Whenever possible, it draws on the experience of domestic disasters, including the 2005 hurricanes (Katrina, Rita, and Wilma), the September 11, 2001, terrorist attack, 2012 Hurricane Sandy, 2015 Hurricane Matthew, 2017 hurricanes (Harvey, Irma, and Maria), 2017 and 2018 wildfires, and many others through 2024.

Types of Disaster Food Assistance

There are multiple ways in which the federal government and 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. Most of the federal nutrition programs are entitlements and can respond quickly and effectively in very substantial ways, without waiting for further legislative action.

Commodity Distribution

With approval from USDA, states may release commodity foods — which are ordinarily intended for the National School Lunch Program (NSLP), 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.

In Louisiana, congregate disaster feeding sites operated for over two months to serve those affected by Hurricanes Katrina and Rita. USDA headquarters also granted the state close to \$1.8 million in

additional commodities, nearly \$900,000 for TEFAP administrative costs, and an additional caseload allocation of 2,000 for the Commodity Supplemental Food Program (CSFP), which supplemented the diets of pregnant and postpartum women with low incomes, children under age 6, and seniors.¹⁰ Ten months after the disasters, some impacted households continued to access food through these channels.

The Federal Emergency Management Agency (FEMA), The American Red Cross, local food banks, and the Feeding America network of food banks, are also likely to be involved in commodity distribution. Many food banks utilize commodities from TEFAP and other federal programs, and in a time of disaster, food banks will likely 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, however, such channels are available, USDA gives preference to D-SNAP.**

Child Nutrition Programs

While D-SNAP is the first line of defense against hunger in a disaster situation, other federal nutrition programs can make critical contributions to relief efforts.¹¹ In a disaster situation, USDA works closely with the [state child nutrition agency](#), which is usually housed in the state's Department of Education, to waive program requirements that would limit access to child nutrition programs. USDA encourages state agencies to review the options available to ensure access to the child nutrition programs in order to prepare and plan prior to a disaster so the response can be swift. Policy guidance on disasters and the child nutrition programs can be found on USDA's website.¹²

School Meals Programs

USDA may waive certain regulatory requirements to increase children's access to nutritious meals during a disaster. In the past, USDA has allowed the state to provide free meals in hard-hit areas to all students, regardless of income, and did so for New York City after Hurricane Sandy in 2012 displaced around 40,000 of the city's families.¹³ USDA also has waived meal pattern requirements, allowing schools to serve meals that ordinarily would not meet federal nutritional guidelines because certain items, such as milk, were unavailable after the disaster.

Child Nutrition Programs at a glance: The National School Lunch and School Breakfast Programs, the Afterschool Nutrition Programs, and the Summer EBT Program, provide meals during the school year and benefits to purchase food in the summer months for children from households with low incomes, and help to lower childhood hunger and support good nutrition. In 2022–2023, just over 28.1 million children participated in school lunch, and over 14.3 million children in school breakfast.

After Hurricane Katrina in 2005, USDA allowed school officials to count displaced children as homeless, making them automatically eligible for free meals. Moreover, pursuant to current policy for homeless children, school officials were able to keep lists documenting eligibility for free meals in lieu of individual applications. In addition, children in households receiving D-SNAP are categorically eligible for free school meals and can be directly certified through the SNAP agency or through a school meal application. After Tropical Storm Harvey hit Louisiana, USDA allowed impacted schools participating in Community Eligibility Provision to recalculate their identified student percentage (ISP) — the basis for how participating schools claim meals. Typically, the ISP must be calculated by April 1 of the prior year. By being able to calculate a new ISP, schools were able to capture the increased number of students participating in SNAP or designated as homeless. Most recently, USDA released [a series of waivers](#)¹⁴ in response to the COVID-19 pandemic that increased children’s access to free school meals, while easing some operational and administrative challenges school districts faced as a result of the Public Health Emergency. School districts across the nation embraced the child nutrition COVID-19 waivers, which allowed schools to continue serving children healthy meals throughout the pandemic.¹⁵

It is important to note that children certified for free or reduced-price school meals because of a disaster situation, including eligibility based on homelessness or receipt of D-SNAP benefits, remain eligible for the entire school year and up to 30 days in the next school year. Households are not required to report changes in income or household size that take place during the school year.

Summer Nutrition Programs

The Summer Food Service Program (SFSP), which can be operated by school nutrition departments, local government agencies, and private nonprofit organizations, and the Seamless Summer Option (SSO), which can be operated by school nutrition departments, normally provide reimbursements for meals and snacks served during summer vacation or year-round schools’ extended breaks. State agencies may allow school nutrition departments and current summer food sponsors to operate SFSP or the SSO when schools or child care facilities must be closed due to disasters. USDA directs states to pre-approve school nutrition departments and sponsors to serve meals in the event of a disaster to accelerate the response. In addition, approval of summer meal sites can be expedited during an emergency.

After the wildfires in 2017, FNS approved Oregon’s request to operate meal service through an SFSP demonstration project that allowed children to take meals home with them. Due to the conditions following the wildfires, including poor air quality, many schools in Oregon were not in session. This demonstration, which allowed children to take home individually sealed meals served through the program rather than have them eat the meals on site, was for specific areas for which the National Weather Service had issued air quality alerts.¹⁶

Child and Adult Care Food Program (CACFP)

In some cases, CACFP, a federal program providing reimbursements for meals and snacks served to children in child care homes and centers, can continue to provide support 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 relax program requirements. USDA evaluates the waiver request to determine whether it is reasonable, necessary, and consistent with the intent of the program as well as protects the health and safety of the children in care. This process allows states to suspend or make more flexible program requirements that simply cannot be met in a disaster, such as defined meal components, record keeping, and enrollment and location requirements. Some states have disaster plans that include CACFP as part of a comprehensive response to disaster.

In the immediate aftermath of the September 11, 2001, terrorist attacks, some CACFP child care centers and family child care providers in New York City became temporary homes for the children in care, and in some cases, their parents. Transportation problems stranded children at child care centers and family child care homes, which, in some cases, prevented parents from reaching their children, and in others, prevented parents from leaving the child care location. To help support these CACFP child care centers and family child care homes, 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, state CACFP staff worked with anti-hunger advocates to connect the day care programs with emergency relief organizations.

After Hurricane Katrina in 2005, USDA acted quickly to issue a comprehensive set of waivers streamlining program operations and eligibility that allowed the maximum use of CACFP resources to feed children in homeless shelters, child care centers, and family child care homes in areas affected by the hurricane and other places where there were significant numbers of displaced families and children. Facilities serving homeless children could serve three meals each day to children through age 18 as well as elderly persons and adults with disabilities normally eligible to receive benefits in the adult day care segment of CACFP.¹⁷

In 2014, Norma Birckhead, manager, CACFP and Summer Food Service Program, issued a memorandum that details ways that CACFP, NSLP, and other programs can aid in the process of rebuilding after a disaster. Providing emergency shelter and food for children in these shelters were clearly outlined as eligible for CACFP participation.¹⁸

WIC in Disasters

During a natural or other disaster, state Special Supplemental Nutrition Program for Women, Infants and Children (WIC) agencies can contribute to relief efforts by supporting coordinated and continued access to WIC through planning and implementing administrative programmatic flexibilities.

Many disasters disproportionately impact people with low incomes, since they too often can only afford to reside in communities prone to flooding and environmental hazards and are less likely to be equipped with resilient infrastructure, emergency response plans, or financial resources, to deal with

disruptions to basic services like power, water, or housing.

Disaster planning to ensure uninterrupted access to WIC is of paramount importance given that many people in disaster zones are already participating in WIC and others will be newly eligible and will need access to the benefits of WIC during these trying times.

WIC at a glance: WIC is a federal nutrition program that provides nutritious supplemental foods, nutrition education, breastfeeding support, and health care referrals for nutritionally at-risk infants, children up to 5 years old, and pregnant and postpartum individuals from households with low incomes.

WIC policies allow state agencies flexibility in program design and administration to facilitate continuation of food benefits, nutrition and breastfeeding support, and referrals for health and social services, to current participants and those newly eligible during times of natural or other disasters.



To leverage these flexibilities, a major disaster or Public Health Emergency needs to be declared pursuant to section 301 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act ([42 U.S.C. 5121 et seq.](#)). A state Governor must [make a request](#) for a declaration, and the President must approve the request. [Federally recognized Indian tribal governments](#) now have the option of pursuing a declaration directly from the President. Once a disaster is declared, (USDA) can provide administrative programmatic flexibilities on a case-by-case basis when a request is made by a WIC state agency.

A new rule requires WIC state agencies to include a plan of alternate operating procedures, commonly referred to as a disaster plan, as part of their state plan. Plans must be submitted by August 15 of each year. Disaster plans are a vital opportunity to ensure continued delivery of WIC benefits to existing recipients and outreach to individuals newly eligible due to the emergency.

This [new rule](#) will improve WIC’s ability to meet the needs of WIC participants during disasters as well as presidentially declared emergencies, Public Health Emergencies, or supply chain disruptions, as determined by the Secretary of Agriculture by:

- providing permanent authority for USDA to issue waivers in the event of certain emergencies, disasters, or supply chain disruptions
- requiring infant formula cost containment contracts include remedies in the event of an infant formula recall
- requiring state agencies to develop alternate operating procedures that can be used to mitigate the impacts of a disaster

This rule implements the provisions of the [Access to Baby Formula Act of 2022 \(ABFA\)](#)¹⁹ and strengthens WIC’s ability to address certain disasters, emergencies, and supply chain disruption, ahead of a disaster. A FAQ on the final rule is available here: <https://www.fns.usda.gov/wic/abfa-qa>.

Preparing for a Disaster

WIC partners can support WIC state agencies' efforts to develop state disaster plans. State plans should include the full range of appropriate “alternative procedure” options that state and local WIC agencies could employ to continue WIC services in federally declared disaster areas. Including a range of alternative procedures in a plan will likely make it easier for a WIC state agency to submit a request seeking USDA’s approval for the appropriate “alternative procedures” during the disaster. The use of “alternative procedures” will depend on the nature of the disaster and its impact, which will also dictate the administrative programmatic flexibilities USDA will approve.

State WIC agencies have opted into [waivers to modernize](#) WIC, including through building or enhancing remote services or benefit issuance through September 2026. These waivers can be leveraged to support WIC access during a disaster.

Note: With the implementation of the ABFA final rule, WIC state agencies will be able to better respond to disasters given that their state plans will include disaster plans.

A state WIC agency disaster plan should include:

- **WIC food package and redemption flexibilities:** To accommodate disaster conditions, such as a loss of refrigeration or the presence of unsafe drinking water, WIC can modify WIC food package components by issuing, for example, ready-to-feed infant formula, shelf-stable milk, or smaller packages of other food items. For WIC shoppers in stores with reduced stock, WIC can allow substitutions for missing items, offering flexibility regarding the types (e.g., full-fat or low-fat milk, if non-fat milk is not available), brands, and sizes of WIC foods.
- **Benefit replacement options:** State WIC agencies can also exercise their authority to include a WIC benefits replacement policy as part of their disaster plans. By replacing lost, unredeemed WIC food vouchers, prorated for the remainder of the month, WIC restores a vital benefit when

WIC clients need it most.

- **Options to support continuation of WIC services (e.g., offering options for enrollment via phone or telehealth, where appropriate, using existing or temporary WIC clinics to meet need):** Many states have availed themselves of continued availability of waivers for services via phone and telehealth, which also will benefit WIC participants in times of disaster. Where appropriate during a disaster, WIC can establish temporary WIC clinics using mobile equipment to provide certification and benefit issuance services to WIC participants in the disaster area. Also, within the disaster area, existing clinics that remain operational can sometimes expand their caseload to accommodate clients and applicants from closed clinics. Outside the disaster zone, WIC should be prepared to serve WIC clients displaced from their homes if adjoining counties, states, or territories have been declared a disaster. Partners can offer space for temporary clinics.
- **Simplified income eligibility and flexibility around certification periods:** WIC can simplify eligibility procedures by allowing disaster-impacted families to qualify for WIC by signing a “self-declaration” form to demonstrate that they are income eligible. This accommodates the many people who lose their income documentation during a disaster. Using automatic income eligibility for applicants who are newly enrolled in Disaster-SNAP will simplify the process. During a disaster, WIC can shorten or extend WIC eligibility certification periods by up to 30 days. This can streamline the WIC certification process. Extending WIC re-certification due dates by 30 days can also remove unnecessary hardship on current participants. These options can also streamline the workload for WIC staff during disasters, potentially allowing them to meet the increased need for WIC.
- **Plans for WIC nutrition and breastfeeding support and services:** WIC can respond to disasters by offering special breastfeeding support hotlines for individuals who have been impacted by a disaster, providing in-clinic nutrition education and counseling on relevant food and water safety issues, and educating participants on the impact of disaster-related trauma on infant and child feeding behaviors and eating patterns. WIC also can modify nutrition education requirements. For example, WIC can consolidate the number of nutrition contacts needed or offer lessons that can be completed online or off-site from the WIC clinic (e.g., at home). Lessons can be shared in hard copy format if electricity and digital communications networks are not functioning.
- **Strategies for referrals to and coordination with needed disaster services:** Plans should include how WIC will fulfill its important function of connecting participants to services by making referrals to SNAP and FEMA emergency services. D-SNAP benefits are a primary source of food for families impacted by disasters. FEMA’s emergency services’ state and regional planning process should include state WIC and SNAP agencies.
- **Communications for disseminating WIC disaster services and policy information to impacted communities and populations:** State WIC agencies should plan using communications channels such as the [state WIC toll-free phone number](#), website, texting systems, and social media, to help WIC clients who are displaced by disasters to know how to

enroll and receive remote services available, to locate the nearest open WIC clinic, and to keep updated on WIC’s disaster policies. State and local agency disaster communications should be issued in the primary languages used by WIC applicants and participants.

WIC stakeholders can facilitate access to WIC during a disaster by fully utilizing their networks to share WIC’s toll-free numbers, the process for connecting to remote enrollment and services, the location of open or temporary WIC clinics, relevant WIC nutrition services, such as breastfeeding hotlines, and any other “alternative procedures” approved by USDA for the state to use to facilitate access to WIC benefits.

Regular SNAP With Waivers

In lieu of implementing a full D-SNAP or parallel to implementing D-SNAP, a state may opt to rely on regular SNAP and seek waivers from USDA to better meet the needs of those affected by the disaster. Under SNAP regulations, it is always possible for individual SNAP recipients who lose food in a “household misfortune” to obtain replacement benefits, *if they report the loss within 10 days*. 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 10-day time frame for reporting a loss of food, permitted the purchase of hot and prepared foods from authorized retailers, and temporarily waived employment and training requirements.²⁰ Using this strategy to expand access to regular SNAP with 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.

SNAP at a glance: SNAP is the nation’s first line of defense against hunger, feeding 40 million people with low incomes and their children in an average month. Program participants can purchase food from supermarkets, groceries, and other SNAP-authorized retailers using their SNAP benefits on an Electronic Benefit Transfer card.

One particularly effective and easy-to-administer waiver involves the automatic replacement of benefits without SNAP households having to report a loss of food to their local offices. Following Hurricane Matthew’s landfall in October 2016, North Carolina obtained a waiver to automatically replace 50 percent of a month’s worth of benefits for all SNAP recipients in select counties.²¹ 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 SNAP households experiencing more severe disaster-related hardships retained the option to apply for further benefits. Following Hurricane Harvey in 2017, USDA approved a request from Texas to provide automatic mass replacement of two months of SNAP benefits by transfer to EBT cards to households in the 32 declared counties.²²

The D-SNAP process can take some time to complete. First, the federal government must declare a disaster, then a state agency must apply for D-SNAP, and finally, USDA makes decisions on the D-SNAP request.

Rather than waiting for the disaster to be declared, states can and should proactively seek waivers for regular SNAP.²³

Puerto Rico Nutrition Assistance Program (NAP)

Puerto Rico’s Nutrition Assistance Program is structured differently from the SNAP entitlement that operates in the 50 states, the District of Columbia, and the Virgin Islands. NAP is a capped block grant with a set amount of funding annually that cannot expand to meet an increased need, whether due to a disaster or economic downturn.²⁴ Therefore, D-SNAP is not available for Puerto Rico. To change NAP, Congress needs to take special action; barring that, Puerto Rico only receives limited disaster assistance.²⁵ In 2022, after Hurricane Fiona²⁶, USDA waived some NAP rules and allowed the purchase of hot foods and a short-term extension of NAP certification periods.²⁷

Disaster SNAP (D-SNAP)

D-SNAP provides replacement benefits for SNAP households that lose food and extends benefits to many other households that would not ordinarily be eligible for SNAP. The latter grouping is helpful whenever there are large numbers of affected people who would not be helped under the eligibility criteria and benefit replacement processes of regular SNAP. Conducting D-SNAP requires that normal channels of food distribution, such as grocery stores, are (or are becoming) operational. Subsequent sections of this guide provide extensive details on D-SNAP operations and rules.

D-SNAP Administration: Timelines and Key Players

The primary responsibility for requesting, planning, and executing D-SNAP, rests with the state agency responsible for administering SNAP; however, USDA FNS headquarters and regional offices, FEMA, other federal agencies, and advocacy organizations may — and often should — be involved as well.

Before a Disaster

State SNAP agencies must have a D-SNAP 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 more.²⁸ The USDA Food and Nutrition Service *Disaster SNAP Guidance* advises states to “identify private disaster relief agencies within the State such as the Red Cross, Salvation Army, or community groups and a description of their role in D- SNAP implementation.”²⁹

Each state’s D-SNAP plan must be approved by USDA. State SNAP agencies must review their disaster plans annually and submit any revisions to USDA by August 15 of each year. Advocates who are interested in reviewing their state’s disaster plan should contact their USDA regional office.³⁰

Provisions for EBT service in a disaster situation should be negotiated in advance of a disaster with the state’s EBT contractor.³¹ States should consider planning an expedited process for obtaining additional EBT cards³² and procedures for handling SNAP transactions when food retailers are

open but unable to communicate with the EBT contractor, 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."³³ 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 federal Robert T. Stafford Disaster Relief and Emergency Assistance Act³⁴ authorizes the President to establish D-SNAP following a disaster declaration, and Executive Order 12673³⁵ delegates this authority to the Secretary of Agriculture. This means that following a presidential declaration of a disaster, USDA may conduct D-SNAP without the President's further approval or involvement.

FEMA is charged with overall coordination of federal relief efforts in a presidentially declared disaster, and USDA FNS is the lead agency for food assistance under FEMA's leadership. While FEMA was widely criticized for its overall disaster response to Hurricane Katrina in 2005, USDA's nutrition assistance delivery was considered effective;³⁶ however, coordinating the two agencies' messages to the public has been a challenge in past disasters. For example, after the terrorist attacks of September 11, 2001, advocates in New York recommended efforts to increase FEMA's familiarity with D-SNAP operations and effective outreach methods.

Although the majority of recent D-SNAP implementation has 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 D-SNAP at the request of a state without requiring a presidential declaration of a major disaster.³⁷ However, the Food Stamp Act imposes an additional requirement for D-SNAP 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' opportunities to purchase food, or a power failure that severely limits food outlets' operations. Commercial channels of food production are considered restored when conditions have improved enough that households have "reasonable access" to food outlets with "sufficient food supplies."³⁸

After a statutory route is invoked to authorize D-SNAP, the process begins:

- 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 which geographic areas are in need of assistance, and notes the viability of commercial food channels.
- Following the assessment, the state must evaluate its potential responses, including D-SNAP, regular SNAP with waivers, and commodity distribution.

As the D-SNAP guide from USDA regarding disaster preparedness notes, a state can minimize the time needed to evaluate these options by having a thorough disaster plan in place before a disaster strikes.³⁹

As the state weighs its policy options, the Federal Emergency Management Agency (FEMA) manages the overall federal response in a federally declared disaster. FEMA groups Emergency Support Functions (ESF) into 15 different areas, with food assistance being ESF-11.⁴⁰ To respond to ESF-11, USDA assembles a Disaster Task Force led by FNS. This Disaster Task Force oversees the disaster relief efforts from USDA headquarters and maintains contact with FEMA and the Department of Homeland Security. USDA also has produced a *Disaster SNAP Handbook* for state agencies.⁴¹

If the state seeks authorization for D-SNAP, it must submit an informal application to the regional USDA office by phone or fax within a “reasonable time” after the disaster. Most tools necessary for a state to apply for D-SNAP can be found on USDA- FNS’s website.⁴²

The default length for a D-SNAP application is seven days. In most cases, qualified households receive one month’s worth of benefits; however, states may propose alternative application and benefit periods. For survivors of hurricanes Katrina and Rita, the application period for disaster or expedited SNAP was extended until October 31, 2005, nearly two full months after the first hurricane occurred.

USDA’s series of policies pertaining to evacuees allowed households to participate at the maximum benefit level for the month of certification and the following complete three-month period. For example, households certified in September were able to receive benefits through the end of December with verification postponed for this entire time frame.⁴³ USDA also approved two months of federally funded D-SNAP benefits for Louisiana victims of the 2016 summer floods and for 2017 hurricane victims in Texas, Florida, and the Virgin Islands.⁴⁴

Taken as a whole, the post-Katrina 2005 evacuee policies marked an unprecedented move on the part of USDA. In issuing the policies, the agency exhibited not only its awareness of the magnitude of the catastrophe, but also its commitment to serving disaster victims in an appropriate and humanitarian way. USDA’s “overriding concern” was defined as “getting benefits to the evacuee as quickly as possible,”⁴⁵ and the agency showed great leadership in meeting its goal. As this example demonstrates, USDA will allow states to employ alternative application and benefit periods in the instance of a major disaster.⁴⁶ Additionally, states may generate their own application forms for the disaster victims or use a template provided by USDA, but states may not make their eligibility criteria more restrictive than federal regulations.

Examples of SNAP Assistance for Evacuees

In 2017, Hurricanes Maria and Irma had a devastating impact on Puerto Rico, with estimated casualties around 5,000.⁴⁷ Many residents evacuated from the island. USDA provided guidance to state SNAP agencies about how to serve individuals who had been receiving benefits under NAP and had been displaced due to the hurricanes.

Under the guidance, given that NAP benefits could not be used outside of Puerto Rico,⁴⁸ such evacuee NAP participants could receive SNAP benefits for up to 2 months in the area in which they were then currently residing. Regular SNAP eligibility rules applied, including expedited procedures as appropriate, which meant that households applying for SNAP were able to receive an eligibility decision within seven days rather than 30 days.

While D-SNAP was not available for Puerto Rico Storm victims, USDA did approve a waiver allowing residents to use their NAP benefits to purchase hot prepared meals.⁴⁹ More significantly, a special appropriation passed by Congress and signed by former President Trump on October 26, 2018, included additional funding to Puerto Rico for NAP disaster aid.⁵⁰

In February 2018, six months after Hurricanes Maria and Irma hit land, Puerto Rico received a \$1.27 billion grant to deliver temporary food assistance through NAP to assist families with low-incomes recovering from the disasters. By summer 2018, some members of Congress were seeking to extend the time that those special funds would remain available for Puerto Rico. USDA also provided temporary flexibilities in Puerto Rico for foods for WIC participants and meal patterns for children served through federally funded school meals and meals in child care settings.⁵¹ It also approved a Disaster Household Distribution request from Puerto Rico to provide food boxes to approximately 500,000 households.

Administering D-SNAP

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

The D-SNAP application and issuance sites are where most of the action happens. In the event of a major disaster, local SNAP offices and their staff are unlikely to have the capacity to handle all of the potential new applicants. Additional or alternative sites may be selected on short notice, and new caseworkers often have to be hired and trained in a matter of hours.

While encouraging an expedited rollout of D-SNAP, advocates should be aware that USDA's priority in a disaster situation is organization and efficiency, though this may slow the speed at which the program is implemented. USDA has advised that taking the additional day or two needed to establish well-coordinated sites with trained workers generally leads to better provision of service and assistance for disaster victims.⁵²

Schools, stadiums, piers, police stations, libraries, mobile vans, rented trailers and tents, high school parking lots, and regular social services offices have all served as application sites in the past. State officials must decide whether to co-locate D-SNAP sites with FEMA and other emergency services and whether to process new D-SNAP applicants and replacement benefit applicants together or separately.

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, such as water, restrooms, and the needs of applicants who are elderly or live with disabilities. Signage and handouts can help applicants understand how the process works, what verification is 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 also should 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 unaffected areas, and temporary hires all can help fill staffing needs.⁵³ After hurricanes Katrina and Rita, the American Public Human Services Association (APHSA), an organization of state and local human services agencies and individuals, facilitated efforts to bring out-of-state workers into the disaster areas.⁵⁴ Given the extent of the devastation, arranging transportation and housing for the out-of-state workers posed the most significant hurdle to this process;⁵⁵ once on the ground, the out-of-state workers were easily integrated into D-SNAP operations on account of their familiarity with the program. Newly hired staff not experienced with D-SNAP will need to be trained in the program's specific provisions, fraud prevention measures, public relations, and personnel matters. Volunteers can help walk applicants through the process and help address human comfort concerns.

Regarding the actual issuance of benefits, EBT cards may be given to clients immediately at the application site, by mail, or at a secondary site, such as a supermarket. States may use any of these issuance methods, depending on which is most feasible in a particular disaster situation. Mississippi experienced a learning curve⁵⁶ and its plans for disasters now include revising the layout of D-SNAP application to facilitate legibility, using the last four digits of the case number as the EBT card's personal identification number (PIN), distributing EBT cards on-site, and creating an online, real-time match with the Florida Department of Motor Vehicles to verify addresses.

Pre-Register for D-SNAP

Florida and Louisiana have launched another approach to disaster relief: having households pre-register for assistance. As soon as possible after a disaster strikes, Florida clients can pre-register by phone or internet, so that they may enter an express line upon arrival at an application site. After either swiping the client's driver's license or entering in the number manually, the worker links the electronic application to an EBT card. The client leaves with the EBT card in hand and receives notification of eligibility by mail. The mailed notification includes the EBT card's PIN, though this information also is accessible online. If the pre-registration process fails due to a technological shortcoming, Florida's plan includes manually processing all applications. The manual process — for clients who are not pre-registered — requires on-site identity verification and completion of paper applications before following the same steps to benefits issuance.⁵⁷

Louisiana's is similar to Florida's, with one key difference: Louisiana's D-SNAP pre-registration accepts year-round applications, not just immediately after a disaster.⁵⁸

Telephone Interviews

Typically, D-SNAP applicants must complete an interview in person. This can be a significant barrier, especially for people with mobility issues, where weather conditions pose health risks, and where transportation is lacking.⁵⁹ FNS has since opened up telephonic interview opportunities for all who are affected by the disaster.⁶⁰ Stakeholders should consider seeking a similar accommodation in planning future recovery efforts.

Virtual D-SNAP

The COVID-19 pandemic forced a lot of innovation to take place. Within D-SNAP, USDA approved virtual D-SNAP operations to take place on a case-by-case basis.⁶¹ As of August 2024, virtual D-SNAP has not been formalized into D-SNAP, but USDA continues to review and approve requests. To determine if an agency can administer this virtual option, they must meet all the tier 1 capabilities and three of the tier 2 capabilities listed in the footnoted August 2021 memo.⁶² On April 2023, USDA extended the August 2021 guidance and included learnings and best practices.⁶³

Phasing Out of D-SNAP

As the initial application period ends, the state agency should decide, based on how many people remain to be served, whether to continue D-SNAP. States may extend the application and benefit periods or expand the geographic area of the program by submitting an informal and then a formal application, as described previously.

When D-SNAP ends, states also may — and often should — facilitate the transition to regular SNAP with waivers. For example, a state may experience or anticipate an administrative backlog in regular SNAP caseloads after devoting workers and resources to the disaster effort. The state could apply to extend certification periods — increasing the length of time at the end of which regular cases must be recertified, thus reducing the number of re-certifications needed in the immediate aftermath of the disaster — to ease the administrative burden on caseworkers.

Many people who receive D-SNAP benefits will be eligible for regular SNAP benefits over the long 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 monitor and support the state's efforts to transition D-SNAP recipients to regular SNAP. Given their strong connection to the community, advocates can be essential to the state in assisting with identifying and reaching out to those individuals and families who are potentially eligible for ongoing assistance.

The state must submit to USDA-FNS daily reports on D-SNAP from each issuance site and a final Report of Disaster Issuance (form FNS-292) at the conclusion of D-SNAP. The daily reports must include the number of households and persons approved for D-SNAP, the number of households denied, the value of benefits approved, and the average benefit per household, all demarcated into

new and existing cases. The state agency also must select a 1 percent sample of cases and conduct an error analysis.⁶⁴ Errors in D-SNAP do not count against a state’s general SNAP error rate for the purposes of awarding high performance bonuses or assessing liabilities for excessive error rates.⁶⁵ The results of the error analysis, combined with the state’s experience with the disaster program, may lead to amendments of the state’s D-SNAP plan.

Eligibility and Benefits

This section details the eligibility criteria for and benefit amounts issued through D-SNAP. The eligibility criteria apply to persons who are not currently receiving SNAP. As noted above, existing SNAP 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 regular SNAP, they need only report their lost food or EBT card to be eligible for replacement benefits.

Income and Resource Test for D-SNAP

To qualify for D-SNAP, a household must not currently receive SNAP and must meet the Disaster Gross Income Limit (DGIL). This is a calculation combining the maximum:

- net income,
- standard income deduction amount, and
- capped shelter expense deductions.

A household's net income and available liquid resources after disaster-related expenses (as determined by the state) must be below the limit set for their household size during the disaster benefit period.⁶⁶ Accessible liquid resources include cash and checking & savings accounts but omit disaster insurance payments or other disaster assistance.

States can make it easier to qualify for D-SNAP by using a standard amount for disaster costs, called the Disaster Standard Expense Deduction (DSED). This covers disaster expenses, including lost food. *Important:* Only households with at least \$100 in other uncovered disaster costs can use the DSED. Lost food alone is not enough to qualify even if the state agency submitted “food loss alone” as a qualifying eligibility factor for D-SNAP.⁶⁷

Other Eligibility Requirements

To be eligible for D-SNAP under USDA policy, applicants must reside in, or have evacuated from, the disaster area (defined in the presidential disaster declaration or D-SNAP waiver request) at the time of the disaster.⁶⁸ Typically, working — but not residing — in a disaster area has not made someone eligible for D-SNAP benefits; however, USDA-FNS has made exceptions for certain circumstances.⁶⁹

Applicants must plan to purchase food during the disaster-benefit period. In addition, applicants must have experienced at least one of the following adverse effects⁷⁰:

- damage to or destruction of their home or self-employment business;
- disaster-related expenses
 - home or business repairs,
 - temporary shelter expenses,
 - evacuation or relocation expenses,
 - disaster-related personal injury (including funeral expenses),
 - lost or no access to income due to the disaster (including reduced, terminated, or delayed receipt of income, for a large part of the benefit period), or
 - inaccessible liquid assets;
- food loss alone can qualify as the sole adverse effect only if the state submitted a D-SNAP request that includes eligibility for households who suffered only food loss (which can be the case during power outages and flooding).⁷¹

State agencies decide for each individual disaster whether food loss alone is satisfactory or whether households must experience other disaster-related losses to be eligible.⁷² Advocates should encourage their states to deem food loss alone to be a basis for D-SNAP.

D-SNAP Rules Broader Than Regular SNAP

A number of requirements for regular SNAP are dropped for D-SNAP. An applicant's citizenship or immigrant status does not affect eligibility for D-SNAP⁷³, and applicants are not required to provide Social Security numbers. There are no special restrictions on students or strikers for the disaster program, nor is there any work or training requirement. Those who are disqualified from regular SNAP for Intentional Program Violations (IPV), such as falsely reporting income or resources on a SNAP application, generally may participate in the disaster program; however, an IPV in the disaster program does count against eligibility for regular SNAP.

Verification

D-SNAP verification requirements are relaxed compared to those for regular SNAP. 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 when possible. Household composition and food loss are verified only if questionable. FNS has uplifted preregistration as a best practice, where households can share information on their composition before a disaster online to simplify the eligibility and verification process after the disaster, and also recommends that eligibility systems include capabilities for data-matching with other state databases.⁷⁴

Benefit Amounts

The maximum disaster benefit amount is equal to the maximum monthly allotment under regular SNAP for a given household size. Households approved for D-SNAP receive the maximum monthly disaster benefit.⁷⁵

For households already receiving SNAP benefits, 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.⁷⁶ Because travel during disasters is likely to be difficult and/or dangerous, advocates should encourage their state agencies to add the replacement amounts for all households within the affected localities.

Some existing SNAP recipients may need more assistance than they had received previously, which might occur if they faced significant disaster-related expenses or a termination of income. In those cases, already participating SNAP 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.

An eligible household must receive its benefits within three days of the approval of its application. As with regular SNAP, benefits are delivered via EBT cards. In the event of a prolonged loss of power or telephone connection, a manual voucher process may be used until those services are restored.⁷⁷

The rules that govern what regular SNAP recipients may buy with their benefits generally apply to D-SNAP as well; however, states may seek a federal waiver of certain regulations when warranted by the circumstances of the disaster. For example, if property damage leaves a significant number of households unable to cook at home, the state may ask USDA to allow regular SNAP recipients to purchase hot and prepared foods from authorized retailers⁷⁸ — an option normally only available in regular SNAP for persons who are homeless, elderly, or have disabilities. Advocates should encourage their state agencies to waive the definition of food so that hot and prepared foods may be purchased with SNAP benefits.

Previously, USDA also has encouraged retailers in areas with such hot, prepared food waivers to post special notices. Based on their experiences with the disaster, some food retailers have suggested to USDA that “the hot foods waiver for authorized food stores be automatically triggered with a disaster declaration” since it is often “too difficult to communicate efficiently and clearly with the spotty telecommunications and power available after a disaster.”⁷⁹

How Advocates Can Make a Difference

Advocates can play a critical role in helping people with low incomes recover from disasters. This section suggests a few of the ways in which advocates can support and improve food assistance following a disaster. See also Appendix 1 for FRAC's checklist of 10 key ways advocates can help disaster food relief efforts.

Download This Guide and Other Documents Now

In the event of a disaster, you may not have electricity 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 documents⁸⁰, such as disaster contacts and outreach plans.

Don't Wait Until a Disaster Hits

Disaster programs used to be seasonal. Unfortunately, disaster requests are now coming in on a nearly monthly basis. Advocates must talk with their state about its disaster preparedness, including who would be the liaison for information on nutrition program relief during disasters. Ask to review the state's nutrition program disaster plans and note whether plans cover those components with which advocates can be particularly helpful, such as outreach. Advocates who have regular meetings or working groups with state and local SNAP officials should consider bringing up the topic of disaster plans during these times, since it can be difficult to develop constructive relationships during the chaotic and fast-moving days that follow a disaster.⁸¹

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 waivers⁸²; 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 quickly as possible. Advocates should stress that SNAP administrators can make life easier for caseworkers as well as clients by seeking broad eligibility criteria and streamlined application and issuance processes. For example, an automatic issuance of replacement SNAP for existing clients saves administrative time and money, while reaching more people in need by not requiring clients to visit their local SNAP office.⁸³

Should advocates be met with resistance from local officials, they should remind officials that D-SNAP not only assists people with low-incomes during a difficult period, but also helps the local economy recover. Bringing in federal funds, SNAP benefits signify revenue for local retailers, generating a “multiplier effect” as the dollars cycle through the local economy. USDA researchers have estimated that, under certain conditions, every \$5 in new SNAP benefits generates as much as \$9 of economic activity.⁸⁴ Disaster relief in the form of immediate purchasing power, such as cash or EBT-based benefits, rather than in-kind donations or commodities brought in from elsewhere, helps local economies to recover from disasters.

Additionally, financial institutions have touted prepaid and EBT cards as an effective form of disaster relief not only for pre-existing customers but also “unbanked” households that do not have the security of a savings or checking account.⁸⁵ To this end, the Red Cross adopted a Client Assistance Card in 2003, which works like a debit card and enables recipients to purchase supplies that they need to begin rebuilding their lives.⁸⁶ FEMA pursued a similar strategy after Hurricane Katrina, giving displaced individuals and families debit cards preloaded with \$2,000 for food, transportation, and other essentials.⁸⁷ Advocates should promote forms of relief, such as preregistering for D-SNAP, which streamlines access to the program once the disaster is declared. give households immediate purchasing power as well as insert much-needed funds into the local economy.⁸⁸

Advocates can also affect the disaster response by partnering with food banks, which often work closely with federal, state, and local officials in distributing commodity relief. Food banks are also well-positioned to alert officials and other partners to the best practices in expediting D-SNAP assistance and helping to incorporate information about D-SNAP into communications with the public. Feeding America partners with FEMA in disaster planning and response and thus could be a key contact for other advocates seeking involvement in publicizing or implementing emergency nutrition programs.⁸⁹

Advocate for Clients After Disaster SNAP (D-SNAP) Is Underway

In times of heightened stress and confusion following a disaster, a state may be too slow to adopt D-SNAP or unduly limit its scope or access to the program. Inevitably, officials will need help in recognizing problems, publicizing the program, and identifying clients whose needs are not being served.

In the days after Hurricane Sandy, AARP New York, Hunger Solutions New York, and 18 other New York-based organizations advocated to then-Mayor Bloomberg and NYC Human Resources Administration Commissioner Doar to seek authority to activate D-SNAP for parts of the city that were hit particularly hard by the storm.⁹⁰ Those organizations then supported disaster relief efforts once D-SNAP was activated for certain parts of the city. Also in New York City, the city settled a lawsuit with residents who have disabilities for violating their rights of reasonable accommodations to apply for D-SNAP.⁹¹

In Maryland (post-Hurricane Sandy), Maryland Hunger Solutions (MDHS) joined Members of Congress in urging the federal government to issue a presidential disaster declaration for Individual Assistance for Somerset County after the state's initial request had been denied. Once the declaration was secured, efforts to highlight the availability of D-SNAP benefits included a visit to the affected area by Senator Ben Cardin (D-MD) and a "Food Resource Day" sponsored by MDHS, AARP MD, Maryland Food Bank, and the Maryland Department of Human Resources. During the latter event, the groups provided D-SNAP information and application assistance.⁹²

Conduct Disaster Nutrition Programs Outreach

Advocates can play a central role in outreach efforts before and after a disaster. Before a disaster hits, advocates should work with the state to inform partner groups about the state's disaster plan. Advocates should also engage with local media beforehand to let them know to expect communication about this. Once the disaster is present, then the outreach strategies can proceed with groups knowing what to expect. This will help guide 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, given the nature of the disaster and the aftermath. 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 nonprofits, supermarkets, community centers, and other public gathering places. To the extent possible, advocates should provide information about other disaster benefits as well, some which are discussed earlier in this guide.

Outreach efforts should be geared toward current SNAP recipients who are eligible for replacement or supplemental disaster benefits as well as those who are newly eligible for food assistance because of the disaster. Even if a state opts for automatic replacement benefits, outreach remains necessary because recipient households should be informed why they are seeing a different benefit amount. In areas without 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 banks, advocates, and state and local elected officials also can help potential beneficiaries become aware of disaster nutrition programs by reaching out to local media to publicize the program. Insufficient publicity of disaster nutrition programs has been a shortcoming cited by some advocates involved with some prior disaster programs. After finding out that that D-SNAP was not publicized by New York City, the state, or FEMA after the September 11 attacks, Hunger Solutions New York recommended that future government disaster relief announcements mention D-SNAP specifically, not just assistance in general.

Elected officials can play pivotal roles in encouraging the state to operate a broad D-SNAP as well as 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.

According to the Food and Nutrition Act of 2008, funding authorized for SNAP may not be used for certain promotional activities, such as television, radio, or billboard advertisements. However, this prohibition does **not** apply to D-SNAP.⁹³ Therefore, advocates and agencies should consider various forms of media outlets and activities to increase awareness of D-SNAP logistics after a disaster. This should include using the zip codes from affected counties and targeting those locations with disaster nutrition programs' messaging.

In addition to conducting planned outreach, advocates should prepare 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 flooded 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. At the same time, advocates should ask states to expand their hotline capacity, knowing that the number of calls received after a disaster is likely to put a strain on normal operations.

Additionally, advocates should urge local, state, and federal officials to prioritize outreach in a disaster scenario. To this effect, FRAC has suggested that contingency funds be made available for disaster-related outreach. Others have supported the development of websites specific to each state, so that information about available disaster relief can be easily and quickly accessed by the public.⁹⁴ Rather than creating separate sites for each locality in county-based states, as residents are largely unaware of the SNAP administration models, a one-stop website for the residents should be managed by the state agency – which will decrease the amount of websites that need to be updated.

The USDA-FNS website posts an interactive map to find information about current and recent D-SNAP operations and related waivers approved for disaster areas.⁹⁵

Help Clients Transition From Disaster SNAP (D-SNAP) to Regular SNAP

D-SNAP is, by definition, a temporary program. While a D-SNAP benefit period typically ends after about 30 days, state agencies can request extensions. Whenever D-SNAP ends, some households will continue to need food assistance thereafter, perhaps due to a disaster-related loss of employment or ongoing expenses. In addition, it is likely that some households that receive D-SNAP assistance were eligible for regular SNAP prior to the disaster, but not participating.

State agencies and advocates should plan to assist households in the transition from the disaster program to the regular program.

Since providing information about regular SNAP 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 as the emergency program is ending or in the months following. For example, in the 10 months following Hurricane Sandy, Maryland Hunger Solutions coordinated four “Food Resource Days” in communities that had been hit hard and offered SNAP eligibility screenings.⁹⁶

Officials in Alabama attributed an increase in regular SNAP enrollment to Hurricane Ivan, which struck in September 2004. From January 2004 to January 2005, SNAP payments in three affected counties increased by 18 percent, while unemployment in the area remained virtually unchanged.⁹⁷ This experience indicates that D-SNAP can reach and bring into regular SNAP households with low-income that were unaware of their eligibility.

Recognize a Job Well-Done

Federal, state, and local SNAP 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.

Praising effective disaster relief efforts can help cement good relationships between advocates and SNAP agencies long after the disaster is over.⁹⁸ Media attention to the positive contributions D-SNAP makes to people and communities affected by a disaster also bolsters public awareness, confidence, and support for regular SNAP.

Shortly after the disaster period ends, it is critical to work with partners and the state to discuss the disaster plan’s strengths, weaknesses, opportunities for improvement, and threats, known as a SWOT analysis. This will ensure that the next disaster response will be better.

A Future World War?

D-SNAP has proven countless times to be an effective form of relief after hurricanes, blackouts, tornadoes, floods, fires, and even terrorist attacks.

During the COVID-19 public health emergency, food supply chains were disrupted and caused essentials like flour and baby formula to sell out and grocery prices to increase.⁹⁹ The dire situation paved the way for solutions from the federal government which included maximum SNAP benefits for households in participating states, school meals at no cost for all students, and child tax credits expanded. The government was able to respond to a global disaster with these critical, albeit short-lived, practices.

It is conceivable, however, that a considerably worse disaster could require nutrition programs to respond in entirely new and different ways. With freshwater scarcity¹⁰⁰, climate crisis affecting farm output¹⁰¹, nations seeing rises of far-right movements¹⁰², global stability at risk¹⁰³, and superpowers engaged in proxy wars¹⁰⁴, a global conflict seems inevitable.

While a global conflict on a scale of the previous world wars would impact everyone, people with low-incomes would be particularly vulnerable as they do not have enough funds to stockpile food and water in advance and, if they did, may not have the space to store it. Should a global conflict occur, it is likely that the food supply chain will be disrupted similar to the COVID-19 period with the addition of global trade routes affected due to military operations — whether it is nations utilizing resources for their military and/or trade vessels and routes being attacked.¹⁰⁵

Since rationing will likely occur as it did World War II¹⁰⁶, advocates for individuals with low incomes should work with state officials to help plan how to manage such a disaster. Topics to discuss include what worked during the COVID-19 public health emergency, what opportunities could have been attempted, and Considerations might include advancing SNAP participants an additional month's worth of benefits at the first signs of foreign attacks on US soil, which would allow households to buy extra food and water. While recognizing the program's limits, advocates also should explore the means by which D-SNAP could respond to a global conflict and work with SNAP officials to revise state disaster plans accordingly. Since the devastation would reach across geographic areas in various ways, large in-person application and issuance sites would not be recommended, and since food channels likely would be interrupted, D-SNAP — as it has been traditionally employed — might in fact not be the most suitable form of relief. Yet, it is nearly certain that some form of food assistance, particularly for individuals with low-income, would be necessary, and thus advocates should think creatively about how D-SNAP and other nutrition programs could be adapted to meet the need.

Conclusion

Because Hurricane Katrina's physical devastation was so extraordinary, there is a tendency to see the human tragedy that it exposed as out of the ordinary as well. In truth, many households in the U.S. today are one disaster away from a similar fate. Every day, tens of millions of individuals with low-income— similar to many of the people who were left behind in New Orleans — struggle with food insecurity, hunger, and poverty. Living day-to-day and week-to-week, those with low incomes

generally lack the material and financial resources needed to withstand a disaster: be it a car to leave the city, a home with a safe place to take shelter, disposable income to buy extra food and water, or health insurance to seek medical care. For them, a natural or man-made crisis often signifies a “second disaster,”¹⁰⁷ whether total economic ruin, physical harm, or worse. In recognizing disasters as a frequent occurrence, as well as understanding their devastating impact on households with low income, it is important to start facing such situations in a different way. All sectors of society, and particularly advocates for the poor, should engage collectively in the preparation for, and response to, disasters. Such collaboration should involve plans for meeting the nutritional needs of people with low incomes in a disaster’s aftermath by utilizing the federal food assistance programs. D-SNAP, regular SNAP with waivers, commodity distribution, the school meals programs, CACFP, and WIC all play important roles in emergency food relief. D-SNAP — with the broad policy options it offers to waive eligibility, verification, issuance, and reporting standards — has displayed an exemplary level of effectiveness and flexibility. It provides not only emergency nutrition assistance to affected households, but also economic support in the form of federal funds to hard-hit communities. As noted above, each dollar in federal SNAP spending generates nearly twice that amount in economic activity.

By becoming familiar with D-SNAP rules and policy options, as well as past examples of the program’s implementation, advocates for low-income individuals can push for a more inclusive approach to disaster preparation and response. Advocates should work with other involved players — primarily federal, state, and local officials, but also food retailers, the EBT industry, and other social service providers — to plan and stage disaster relief in a way that prioritizes aid to households with low income.

As a society, we share a responsibility to ensure that the needs of people experiencing poverty are neither forgotten nor disregarded, particularly in moments of crisis. To meet this charge, we must implement and improve programs that maximize assistance to the most vulnerable populations and most devastated communities in times of greatest need.

Links and Resources

Federal Statute:

- The Food Stamp Act of 1977, as amended (disaster program authorized in Sections 5(h) and 11(e)(14)): <https://www.congress.gov/95/statute/STATUTE-91/STATUTE-91-Pg913.pdf>
- The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Sec. 412: <https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended>

Federal Regulations:

- Replacement issuance of SNAP (7 CFR §274.6): <https://www.law.cornell.edu/cfr/text/7/274.6>
- Emergency food assistance for victims of disasters (7 CFR §280.1): <https://www.law.cornell.edu/cfr/text/7/280.1>

USDA-FNS Resources:

- Disaster assistance main page (with separate sections for individuals and states/territories): <http://www.fns.usda.gov/disasters/disaster.htm>
- Equity in FNS Disaster Nutrition Assistance Programs: <https://www.fns.usda.gov/da/equity>
- National and regional disaster contacts: <https://www.fns.usda.gov/fns-regional-offices>
- State contacts: <https://www.fns.usda.gov/fns-contacts?f%5B0%5D=program%3A39>
- EBT Disaster Guidelines: http://www.fns.usda.gov/sites/default/files/disaster_handout.pdf
- D-SNAP Allotments and Eligibility Standards: <https://www.fns.usda.gov/snap/dsnap/state-agencies-partners-resources/fy25-income-eligibility>
- D-SNAP Toolkit for State Agencies:
 - <https://www.fns.usda.gov/snap/dsnap/toolkit>
- D-SNAP Guidance Handbook: https://fns-prod.azureedge.us/sites/default/files/resource-files/D-SNAP_handbook.pdf
- D-SNAP policies issued after Hurricanes Katrina and Rita:
 - National Evacuee Policy: <https://www.fns.usda.gov/snap/dsnap/national-enhanced-policy-evacuees>
 - Expanded Disaster Evacuee Policy: <https://www.fns.usda.gov/snap/dsnap/expanded-disaster-evacuee-policy>
 - National Enhanced Policy for Evacuees: <https://www.fns.usda.gov/snap/national-enhanced-policy-evacuees>
 - Questions and Answers on Evacuees: <https://www.fns.usda.gov/snap/dsnap/questions-answers-evacuees>

- School Meals Programs policies issues after Hurricanes Katrina and Rita:
 - Emergency Feeding of Schoolchildren in Areas Devastated by Hurricane Katrina: <https://www.fns.usda.gov/emergency-feeding-school-children-areas-devastated-hurricane-katrina>
 - Extension of 30 Day Limit for Initial Carry-over of Previous Year's Eligibility due to Hurricane Katrina: <https://www.fns.usda.gov/extension-30-day-limit-initial-carry-over-previous-year%E2%80%99s-eligibility-due-hurricane-katrina>
 - School Meals Programs: Extension of Waivers due to Emergency Conditions Caused by Hurricane Katrina: <https://www.fns.usda.gov/school-meals-programs-extension-waivers-due-emergency-conditions-caused-hurricane-katrina>
 - School Meals Programs: Verification and Hurricane Katrina: <https://www.fns.usda.gov/school-meals-programs-verification-procedures-and-hurricane-katrina>
 - School Meals Programs: Verification and Hurricane Katrina: <https://www.fns.usda.gov/school-meals-programs-hurricane-rita-extending-waivers-hurricane-katrina>
- Summer Food Service Program (SFSP) policies after Hurricanes Katrina and Rita:
 - Summer Food Service Program (SFSP) Policy #02-2005: Extension of Waivers due to Emergency Conditions Caused by Hurricane Katrina: <https://www.fns.usda.gov/school-meals-programs-extension-waivers-due-emergency-conditions-caused-hurricane-katrina>
- Child and Adult Care Food Program (CACFP) policies after Hurricanes Katrina and Rita:
 - CACFP Policy #06-2005: Extension of Waivers due to Emergency Conditions Caused by Hurricane Katrina: <https://www.fns.usda.gov/child-and-adult-care-food-program-cacfp-policy-06-2005-extension-waivers-due-emergency-conditions>

WIC Disaster Resources:

- WIC Policy Memorandum #2024-3: Implementing ABFA Requirements in WIC State Plans <https://www.fns.usda.gov/wic/wpm-2024-3-implementing-abfa-requirements>

Other Federal Resources:

- Federal Emergency Management Agency webpage: <http://www.fema.gov/>
- Federal Disaster Assistance webpage: www.disasterassistance.gov/

Food Research & Action Center Resources:

- Supplemental Nutritional Assistance Program (SNAP): <http://www.frac.org/programs/supplemental-nutrition-assistance-program-snap>
- National School Lunch Program (NSLP): <http://frac.org/programs/national-school-lunch-program>
- Child and Adult Care Food Program (CACFP):

<http://frac.org/programs/child-adult-care-food-program>

- WIC:
<http://frac.org/programs/wic-women-infants-children>
- Disaster Supplemental Nutritional Assistance Program (D-SNAP):
<http://www.frac.org/programs/supplemental-nutrition-assistance-program-snap/disaster-snap-food-stamps>
- FRAC's Disaster SNAP Webinar:
<https://www.youtube.com/watch?v=u4UJ2cybDNw>

Other Information on Disasters and Resilience:

- National League of Cities' disaster preparedness resource page:
<https://www.nlc.org/article/2023/09/01/local-leaders-role-before-during-and-after-disasters/>
- USDA-FNS Disaster Relief page:
<https://www.fns.usda.gov/disaster/disaster-assistance>
- FEMA Disaster homepage. Contains searchable database of disaster declarations:
<https://www.fema.gov/disasters/grid/year>
- Initiative for a Competitive Inner City: The Resilience of America's Urban Food Systems:
http://icic.org/wp-content/uploads/2017/01/Rockefeller_ResilientFoodSystems_FINAL_post.pdf?x9688o

10 Key Ways Advocates Can Help Before, During, and After a Disaster

- 1** Develop a constructive relationship with your state and local SNAP offices and local media before a disaster strikes.
- 2** Ask your state about its disaster plans, or bring up disaster readiness at regular meetings or working group sessions before a disaster.
- 3** Encourage your state to apply to USDA as quickly as possible for D-SNAP when a disaster occurs, and monitor its progress during the application process
- 4** Encourage your state to ask for automatic replacement of benefits for existing recipients, waiver for hot/prepared foods, 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 other nonprofit organizations to promote nutrition assistance programs.
- 6** Press local elected officials, the media, and FEMA to mention D-SNAP specifically, not just assistance in general.
- 7** Use all of your normal outreach channels and methods to inform people about disaster nutrition programs 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 D-SNAP recipients who might be eligible for regular SNAP 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 SNAP (D-SNAP) 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 regular SNAP 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 SNAP 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 SNAP 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.

¹ NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2024). <https://www.ncei.noaa.gov/access/billions/>, DOI: [10.25921/stkw-7w73](https://doi.org/10.25921/stkw-7w73)

² <https://www.ncei.noaa.gov/access/billions/events>

³ CNN. (2016). *Hurricane Katrina Statistics Fast Facts*. Available at:

<http://www.cnn.com/2013/08/23/us/hurricane-katrina-statistics-fast-facts/>. Accessed on AUGUST 16, 2024.

⁴ U.S. Department of Homeland Security. (2006). *The Federal Response to Hurricane Katrina Lessons Learned*. Available at: <https://biotech.law.lsu.edu/katrina/govdocs/katrina-lessons-learned.pdf>. Accessed on August 16, 2024.

⁵ The Star Online. (2006). *New Orleans population whiter, smaller post-storm*. Available at:

<http://www.thestar.com.my/news/world/2006/06/08/new-orleans-population-whiter-smaller-poststorm/>. Accessed on August 16, 2024

⁶ For poverty-related data for New Orleans, see the 2004 American Community Survey at: <http://factfinder.census.gov>.

Enter table number “S1701” (entitled “Poverty Status in the Past 12 Months”), and then select “place” as the geographic type, “Louisiana” as the state, and “New Orleans city” as the geographic area.

⁷ An Epic Disaster Required Unprecedented Response | USDA, <https://www.usda.gov/media/blog/2012/05/16/epic-disaster-required-unprecedented-response>. Accessed July 17, 2024

⁸ Disaster Response Summary FY 2017: <https://fns-prod.azureedge.us/sites/default/files/resource-files/FNS-Disaster-Response-Summary-FY17.pdf>. Last accessed August 16, 2024

⁹ When included in the state’s D-SNAP request

¹⁰ Pursuant to the 2014 Farm Bill, CSFP now serves only seniors with low-incomes.

¹¹ <https://www.fns.usda.gov/fns-contacts?f%5Bo%5D=program%3A39>

¹² <https://www.fns.usda.gov/cn/disaster-response>

¹³ Patch. (2012). *USDA Will Fund Free Meals for NYC Schools Post-Sandy*. Available at: <https://patch.com/new-york/windsorterrace/amp/13558120/usda-will-fund-free-meals-for-nyc-schools-post-sandy>. Accessed on August 20, 2024.

¹⁴ <https://www.fns.usda.gov/disaster-assistance/child-nutrition-covid-19-waivers>

¹⁵ <https://frac.org/wp-content/uploads/large-school-district-report-2023.pdf>

¹⁶ U.S. Department of Agriculture, Food and Nutrition Service. (2017). *USDA Provides Oregon Children Impacted by Wildfires More Flexible Access to Meals Service*. Available at: <https://www.fns.usda.gov/pressrelease/2017/010517>. Accessed on August 20, 2024.

¹⁷ See the following source for an overview of CACFP, WIC, and other USDA-FNS programs’ involvement in relief efforts. Source: Congressional Research. (2006). *Federal Food Assistance in Disasters: Hurricanes Katrina and Rita*. Available at: <http://www.congressionalresearch.com/RL33102/document.php?study=Federal+Food+Assistance+in+Disaster+s+Hurricanes+Katrina+and+Rita>. Accessed on August 20, 2024.

¹⁸ The memo outlines protocol for many other programs that become vital in periods after a disaster.

Source: Child and Adult Care Food Program. (2014). *Memo regarding CACFP and SFSP participation*. Available at: <https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/CACFP%20%2312-2014%20Disaster%20Response.pdf>. Accessed on August 20, 2024.

¹⁹ <https://www.govinfo.gov/app/details/PLAW-117publ129>

²⁰ When applying for regular SNAP, households must verify identity, resources, income, and citizenship/immigration status, among other factors. Certain groups of people, such as students who neither work at least 20 hours per week nor care for a dependent, are ineligible for SNAP benefits. Certain so-called able-bodied adults without dependents (ABAWD) have to meet employment and training requirements in some localities to receive regular SNAP for more than three months. However, in a disaster scenario, many of these verification and eligibility rules and regulations are often waived. See USDA-FNS’s *Waivers of Rules* for more information: <https://www.fns.usda.gov/snap/waivers-rules>.

²¹ USDA-FNS approved more than one waiver in the wake of Hurricane Matthew in North Carolina. Many of the waivers focused on issuing replacement SNAP benefits; however, waivers were also approved to expand D-SNAP into more counties as well as augment child nutrition policies. The complete list of North Carolina waivers associated with Hurricane Matthew can be found here: <https://www.fns.usda.gov/disaster/north-carolina-disaster-nutrition-assistance>.

²² Food and Nutrition Service (2018). *Texas Disaster Nutrition Assistance Incident: Hurricane Harvey*. Available at: <https://www.fns.usda.gov/disaster/texas-disaster-nutrition-assistance> Accessed June 24, 2018.

²³ In 2022 and 2024, New Mexico sought waivers for the definition of food so that hot foods could be bought with SNAP benefits and for the 10-day requirement for reporting lost food to be waived before their D-SNAP was approved. [New Mexico Disaster Nutrition Assistance | Food and Nutrition Service \(usda.gov\)](https://www.usda.gov/new-mexico-disaster-nutrition-assistance)

²⁴ Food and Nutrition Service. *Implementing Supplemental Nutrition Assistance Program in Puerto Rico*. Available at: <https://www.fns.usda.gov/research/snap/implementing-snap-in-puerto-rico-feasibility-study> Accessed August 20, 2024.

²⁵ <https://www.fns.usda.gov/disaster/commonwealth-puerto-rico-disaster-nutrition-assistance>

²⁶ <https://frac.org/blog/tale-of-two-hurricane-responses>

²⁷ <https://www.fns.usda.gov/disaster/commonwealth-puerto-rico-disaster-nutrition-assistance>

²⁸ See 7 USC 51, §2020(e14) <https://www.govinfo.gov/content/pkg/USCODE-2020-title7/html/USCODE-2020-title7-chap51-sec2020.htm>, accessed August 20, 2024

²⁹ https://fns-prod.azureedge.us/sites/default/files/resource-files/D-SNAP_handbook.pdf, accessed August 20, 2024

³⁰ Regional disaster contacts are available at: <https://www.fns.usda.gov/fns-regional-offices>.

³¹ Based on its experience with the hurricanes of 2005, Texas Health and Human Services recommends formalizing disaster plans with EBT contractors by replacing verbal agreements with memoranda of understanding and developing strategies that can be scaled up or down appropriately (Kay Jones, “Disaster Services: The Tall Texas Tale – A Storm Named Katrina and Her Little Sister Rita,” PowerPoint, 2006 National EBT State Directors Meeting, May 2006).

³² States should consider whether to order additional EBT cards in advance, have the capacity to produce the necessary amount if a disaster strikes, or pursue a combination of these two options. Whichever route is followed will then affect the state’s plans for storing and shipping the cards as well.

- 33 <https://www.fema.gov/disaster/how-declared>
- 34 <https://www.govinfo.gov/content/pkg/COMPS-2977/pdf/COMPS-2977.pdf>
- 35 <https://www.federalregister.gov/executive-order/12673>
- 36 USDA’s response to the disaster – including commodity distribution, waivers for school meal programs, and implementation of D-SNAP – is described in the “What Went Right” section of the White House’s official report, “Federal Response to Hurricane Katrina: Lessons Learned” (February 23, 2006). This section of the report is available at <https://georgewbush-whitehouse.archives.gov/reports/katrina-lessons-learned/chapter5.html>. Also, on June 21, 2006, FRAC recognized the regional and national staff of USDA FNS with a Distinguished Service Award for their fast, effective, and compassionate efforts to get SNAP, WIC, and child nutrition benefits to those devastated by Hurricanes Katrina, Rita, and Wilma.
- 37 <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-280>
- 38 U.S. Department of Agriculture, Food and Nutrition Service. (2014). Disaster SNAP Guidance. Available at: https://fns-prod.azureedge.us/sites/default/files/resource-files/D-SNAP_handbook.pdf. Accessed on August 20, 2024.
- 39 U.S. Department of Agriculture, Food and Nutrition Service. (n.d.). Disaster Outreach. Available at: <https://www.fns.usda.gov/snap/dsnap/toolkit>. Accessed on August 20, 2024.
- 40 <https://dhhr.wv.gov/bfa/policyplans/Documents/FY24%20DSNAP%20State%20Plan.pdf>
- 41 https://fns-prod.azureedge.us/sites/default/files/resource-files/D-SNAP_handbook.pdf
- 42 See USDA-FNS’s “D-SNAP Resources for State Agencies and Partners” page on their website, available at: <https://www.fns.usda.gov/snap/dsnap/state-agencies-partners-resources>. Last accessed August 20, 2024.
- 43 USDA issued the “National Refugee Policy,” following Hurricane Katrina, and it was quickly replaced with the “National Evacuee Policy,” which removed the term “refugee” but was otherwise identical. Later, USDA issued the “Expanded Disaster Evacuee Policy,” “National Enhanced Policy for Evacuees,” and “Questions & Answers on Evacuees” to give guidance on eligibility and verification requirements, application and benefit periods and allotments, and EBT card replacement and usage. All of these policies are accessible through USDA-FNS’s website. <https://www.fns.usda.gov/snap/dsnap/national-enhanced-policy-evacuees>. Accessed August 20, 2024.
- 44 FNS reports on Texas, Florida, and the Virgin Islands can be found at: <https://www.fns.usda.gov/disaster/texas-disaster-nutrition-assistance>, <https://www.fns.usda.gov/disaster/florida-disaster-nutrition-assistance>, <https://www.fns.usda.gov/disaster/us-virgin-islands>. Accessed August 20, 2024.
- 45 <https://www.fns.usda.gov/snap/dsnap/questions-answers-evacuees>
- 46 On a related note, Senators Tom Harkin (D-IA) and Patrick Leahy (D-VT) pushed to further expand and sustain USDA’s authority with the introduction of their bill, “Hurricane Katrina Food Assistance Relief Act,” in the Senate on September 13, 2005. To access the full text, enter bill number S.1695 into the search engine at: <https://www.congress.gov/bill/109th-congress/senate-bill/1695>. Accessed August 20, 2024.
- 47 Study conducted by Harvard School of Public Health. <https://www.hsph.harvard.edu/news/press-releases/death-rate-increase-puerto-rico-hurricane-maria/>. Accessed August 20, 2024.
- 48 See USDA press release for updates to nutrition assistance and disaster response in Puerto Rico after hurricanes Maria and Irma: <https://www.usda.gov/media/press-releases/2017/10/01/usda-announces-snap-policy-displaced-puerto-rico-residents>.
- 49 Food and Nutrition Service. (2017, October 5). *USDA Continues Disaster Assistance in Puerto Rico* [Press release]. Available at <https://www.fns.usda.gov/pressrelease/2017/013017>. Accessed August 20, 2024.
- 50 Information on the history of the act is available at <https://www.congress.gov/bill/115th-congress/house-bill/2266/all-actions?overview=closed#tabs>. Accessed August 20, 2024.
- 51 Details can be found here: <https://www.fns.usda.gov/disaster/commonwealth-puerto-rico-disaster-nutrition-assistance>. Accessed August 20, 2024.
- 52 Section 5 of the “Disaster SNAP Guidance” Handbook, published by USDA-FNS, talks about the various factors that should be considered when choosing application sites, among other important needs to keep in mind when designing a D-SNAP site. This handbook is available at: https://fns-prod.azureedge.us/sites/default/files/resource-files/D-SNAP_handbook.pdf. Accessed August 20, 2024.
- 53 Based on its experience with Hurricanes Katrina and Rita, the Louisiana Department of Social Services recommended that states: 1) develop a database of staff willing to come from unaffected areas to provide disaster assistance; and 2) formalize agreements with other states for the exchange of staff. Source: Louisiana Department of Social Services. (2006). “Louisiana Disaster Planning 2006.” (PowerPoint at the 2006 National EBT State Directors Meeting in May 2006.) This is not available online.
- 54 Responding to a request from the Louisiana Department of Social Services for assistance with the state’s post-Katrina D-SNAP effort, 53 human service employees were rushed from Iowa, Kansas, Oklahoma, and South Dakota to Baton Rouge on September 14. Along with Delaware and Washington, several of these states again sent workers just two weeks later for

Hurricane Rita relief.

⁵⁵ Staff brought from non-disaster areas to work at the application centers set up after Hurricane Katrina were housed in the centers themselves or local church facilities, due to a lack of availability of rooms at hotels and motels. Source: Owen, A. D. (2006). “Mississippi’s Hurricane Katrina Disaster Management: Key Strategies.” (PowerPoint at the 2006 National EBT State Directors Meeting in May 2006.) This is not available online.

⁵⁶ Prior to Hurricane Katrina, Mississippi’s disaster plan called for not only issuance but also activation of EBT cards at the application sites. However, given the substantial number of persons seeking assistance after the 2005 hurricane, D-SNAP applications had to be batched and processed off-site at separate processing centers. The state was forced to issue inactive EBT cards and to instruct clients to activate them via phone three days later, using their date of birth and Social Security number. Florida also faced difficulties with benefits issuance, such as data entry errors, an overloaded phone system, and undeliverable mail, after Hurricanes Dennis and Wilma hit in 2005. Owen, A. D. (2006). “Mississippi’s Hurricane Katrina Disaster Management: Key Strategies.” (PowerPoint at the National EBT State Directors Meeting in May 2006.) This is not available online.

⁵⁷ Florida Department of Children and Families – ACCESS Florida, “Lessons Learned: Chapter 3, Dennis and Wilma,” PowerPoint, 2006 National EBT State Directors Meeting (May 2006).

⁵⁸ See the Louisiana Department of Children and Family Services press release at:

<http://www.dss.state.la.us/index.cfm?md=newsroom&tmp=detail&articleID=733>.

⁵⁹ In the wake of a class action lawsuit alleging that D-SNAP applicants with disabilities had not been accommodated at post-Hurricane Irma D-SNAP sites in violation of the Americans with Disabilities Act, FNS agreed to allow qualifying interviews for D-SNAP for certain clients over the phone rather than in-person. For information on USDA’s approval on Nov. 16, 2017, see <https://www.fns.usda.gov/disaster/florida-disaster-nutrition-assistance>. For background on the litigation, see <http://communityjusticeproject.com/dsnap/>.

⁶⁰ [Use of Virtual D-SNAP Operations Reminders and Updates | Food and Nutrition Service \(usda.gov\)](https://www.fns.usda.gov/operations/reminders-and-updates)

⁶¹ [https://fns-prod.azureedge.us/sites/default/files/resource-files/Use%20of%20Virtual%20Disaster%20SNAP%20\(D-SNAP\)%20Operations%20in%20Remainder%20of%20FY%202021%20and%20FY%202022.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/Use%20of%20Virtual%20Disaster%20SNAP%20(D-SNAP)%20Operations%20in%20Remainder%20of%20FY%202021%20and%20FY%202022.pdf) Accessed August 21, 2024.

⁶² [https://fns-prod.azureedge.us/sites/default/files/resource-files/Use%20of%20Virtual%20Disaster%20SNAP%20\(D-SNAP\)%20Operations%20in%20Remainder%20of%20FY%202021%20and%20FY%202022.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/Use%20of%20Virtual%20Disaster%20SNAP%20(D-SNAP)%20Operations%20in%20Remainder%20of%20FY%202021%20and%20FY%202022.pdf) accessed August 21, 2024.

⁶³ <https://www.fns.usda.gov/snap/virtual-dsnap-reminders>

⁶⁴ To ensure program integrity, Mississippi elected to review 100 percent of the post-Katrina disaster food stamp applications submitted by state and county employees on their own behalf, in addition to the customary 1 percent sample.

Source: Owen, A. D. (2006). “Mississippi’s Hurricane Katrina Disaster Management: Key Strategies.” (PowerPoint at the 2006 National EBT State Directors Meeting in May 2006.) This is not available online.

⁶⁵ States are not excused from higher error rates in regular SNAP that may arise as a byproduct of the extra administrative burden of D-SNAP. For that reason, states affected by disasters should seriously consider requesting waivers that extend certification periods in regular SNAP or provide other administrative relief.

⁶⁶ <https://www.fns.usda.gov/snap/dsnap/state-agencies-partners-resources/fy25-income-eligibility>

⁶⁷ <https://www.fns.usda.gov/snap/dsnap/state-agencies-partners-resources/fy25-income-eligibility>

⁶⁸ Advocates have pointed out in past disasters that the geographic eligibility criteria imposed by USDA-FNS have shortcomings. For example, a Hunger Solutions New York report noted that the official disaster area following the attacks on the World Trade Center in 2001 was Manhattan below 14th Street. A problem with that designation was that an individual who worked in lower Manhattan and lost his or her job, but lived in New Jersey, was ineligible for disaster benefits, while an individual who lived below 14th Street, while keeping his or her job, might be eligible. The same report underscores that geographic eligibility criteria are not required by statute; however, USDA-FNS generally expects states to have a defined area for assistance.

⁶⁹ Mississippi received approval for D-SNAP for those residing or working in the identified disaster areas.

<https://www.fns.usda.gov/news-item/usda-0082.23>

⁷⁰ <https://www.disasterassistance.gov/get-assistance/forms-of-assistance/5769>

⁷¹ <https://www.fns.usda.gov/snap/dsnap-policy-clarifications>

⁷² <https://www.fns.usda.gov/snap/food-loss-eligibility-factor-disaster-food-stamp-program>

⁷³ <https://www.fema.gov/fact-sheet/4562/citizenship-and-immigration-status-requirements-fema-disaster-assistance>

⁷⁴ <https://fns-prod.azureedge.us/sites/default/files/resource-files/dsnap-BestPractices-operations-planning-FinalReport.pdf>

⁷⁵ The benefit amounts can be found under “D-SNAP Allotments and Eligibility Standards” section at:

<https://www.fns.usda.gov/snap/dsnap/state-agencies-partners-resources>

⁷⁶ 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.

⁷⁷ <https://fns-prod.azureedge.us/sites/default/files/snap/Manual-Voucher-Process.pdf>

⁷⁸ After Hurricane Laura occurred in Louisiana during August 2020, USDA approved a waiver to permit disaster victims to use their regular SNAP benefits through November 2020, to purchase hot, prepared foods.

<https://www.fns.usda.gov/disaster/louisiana-disaster-nutrition-assistance>

⁷⁹ Food Marketing Institute. (2005). Statement of Rich Savner. Available at: <http://www.fmi.org/docs/newsletters-comments/food-stamp-benefits.pdf?sfvrsn=2>. Accessed on July 20, 2017.

⁸⁰ Best Practices in Disaster SNAP Operations and Planning <https://fns-prod.azureedge.us/sites/default/files/resource-files/dsnap-BestPractices-operations-planning-FinalReport.pdf>

⁸¹ Disaster Nutrition Assistance Timeline <https://www.fns.usda.gov/da/timeline>

⁸² Available here: <https://www.fns.usda.gov/da/disaster-assistance>

⁸³ As with regular SNAP, D-SNAP benefits are fully federally funded and administrative costs are shared nearly equally by state and federal governments.

⁸⁴ U.S. Department of Agriculture, Economic Research Service. (n.d.). Economic Linkages Supplemental Nutrition Assistance Program (SNAP) Linkages with the General Economy (webpage). Available at: <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/>. Accessed on August 20, 2024.

⁸⁵ Cheny, J. S. & Rhine, S. L. W. (2006). *How effective were the financial safety nets in the aftermath of Katrina?* Available at: <https://ideas.repec.org/p/fip/fedpdp/06-01.html>. Accessed on August 20, 2024. Following this publication, the Payment Cards Center Federal Reserve Bank of Philadelphia hosted a conference entitled “The Role of Electronic Payments in Disaster Recovery: Providing More Than Convenience” (May 2006), which included panelists from the U.S. Department of the Treasury, USDA, major U.S. banks, and the American Red Cross.

⁸⁶ Business Wire. (2015). *U.S. Bank Offers Prepaid Card Services for the American Red Cross*. Available at: <http://www.businesswire.com/news/home/20150408005686/en/U.S.-Bank-Offers-Prepaid-Card-Services-American>. Accessed on August 20, 2024.

⁸⁷ FEMA’s issuance of these preloaded cards, as part of the agency’s Expedited Assistance program, was halted after several days. Recently, FEMA announced improvements to the Expedited Assistance program that include “reducing the amount of assistance provided in this initial payment and eliminating the use of debit cards.” Source: FEMA. (2006). *Improving Safeguards in the Delivery of FEMA Assistance Programs*. Available at: http://www.fema.gov/txt/media/2006/safeguards_fact_sheet.txt. Accessed on August 21, 2024.

See also the statement of Donna M. Daniels, Acting Deputy Director of Recovery at FEMA, before the Investigations Subcommittee of the Homeland Security Committee, U.S. House of Representatives (June 14, 2006), available at: http://www.fema.gov/txt/media/2006/dannels_statement.txt. Note, however, that FEMA’s stance on the use of debit cards in disaster relief is not necessarily indicative of the entire federal government’s position. For instance, the following footnote of this report details the Department of Health and Human Services’ consideration of EBT cards as a primary and effective way to distribute disaster aid.

⁸⁸ In response to FEMA’s bungled disaster relief witnessed after Hurricane Katrina, the Bush administration charged HHS with improving the delivery of such relief, prompting the agency to consider the benefits of EBT cards. For the full RFI, see *Federal Register*: June 14, 2006 (Volume 71, Number 114), available at: <https://www.gpo.gov/fdsys/pkg/FR-2006-06-14/html/E6-9314.htm>. The RFI also poses good questions that could help guide the development of state disaster plans.

⁸⁹ FEMA engages with Feeding America and other members of the National Voluntary Organizations Active in Disaster (VOAD). For a list of organizations that VOAD members, go to: <https://www.nvoad.org/voad-members/https://www.nvoad.org/voad-members/national-members/>.

⁹⁰ The letter, compiled by 20 various organizations, was sent to Bloomberg and Doar on November 12, 2012. Available at: <https://www.legalservicesnyc.org/news/lsnyc-others-urge-hra-to-request-disaster-snap-approval/>

⁹¹ <https://www.nydailynews.com/2015/04/01/nyc-settles-lawsuit-with-disabled-citizens-over-hurricane-sandy-related-food-stamps-they-didnt-receive/>

⁹² Maryland Hunger Solutions. (2013). Press release regarding "Somerset County Residents Recovering from Hurricane Sandy Participate in *Food Resource Day*." Available at: http://www.mdhungersolutions.org/pdf/storm_sandy_food_resource_day_jan2013.pdf. Accessed on July 20, 2018.

⁹³ This information can be found in Section II of the following USDA-FNS final rule, under the heading “Disaster SNAP”: <https://www.federalregister.gov/documents/2016/12/20/2016-30621/supplemental-nutrition-assistance-program-promotion>.

⁹⁴ The Louisiana Department of Social Services notes that it learned from its experience with Hurricane Katrina that making the latest policies and procedures available via the internet is of great importance (Louisiana Department of Social Services,

“Disaster Planning – 2006,” PowerPoint, 2006 National EBT State Directors Meeting, May 2006).

⁹⁵ U.S. Department of Agriculture, Food and Nutrition Service. (n.d.). Food Assistance for Disaster Relief (webpage). Available at: <https://www.fns.usda.gov/disaster/disaster-assistance>. Accessed on September 3, 2024.

⁹⁶ Maryland Hunger Solutions. (2013). Press release regarding "Hundreds of Residents Benefit from Garrett County Food Resource Day. Available at:

http://www.mdhungersolutions.org/pdf/aug_2013_md_garrett_county_food_resource_day_release.pdf. Accessed on July 20, 2017.

⁹⁷ Linn, M. (2005). *Montgomery Advertiser*. “Ivan’s wake fuels SNAP.” This is not available online.

⁹⁸ On June 21, 2006, FRAC honored the Louisiana Department of Social Services, Office of Family Support, in recognition of the Family Assistance Program’s quick and effective delivery of disaster food stamps and other aid in the wake of Hurricanes Katrina and Rita as well as its ongoing efforts to combat hunger in Louisiana.

⁹⁹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9335023/>

¹⁰⁰ <https://www.fao.org/land-water/water/water-scarcity/en/>

¹⁰¹ <https://www.epa.gov/climateimpacts/climate-change-impacts-agriculture-and-food-supply>

¹⁰² <https://inthesetimes.com/article/global-far-right-meloni-milei-putin-bannon-orban>

¹⁰³ <https://www.un.org/en/un75/new-era-conflict-and-violence>

¹⁰⁴ <https://www.newamerica.org/future-security/reports/twenty-first-century-proxy-warfare-confronting-strategic-innovation-multipolar-world/>

¹⁰⁵ <https://www.nps.gov/articles/000/food-rationing-on-the-world-war-ii-home-front.htm>

¹⁰⁶ id.

¹⁰⁷ Pastor, M., Bullard, R. D., Boyce, J. K., Fothergill, A., Morell-Frosch, R., & Wright, B. (2006). *In the Wake of the Storm: Environment, Disaster, and Race after Katrina* Available at: https://www.e-education.psu.edu/geog882/sites/www.e-education.psu.edu/geog882/files/file/in_the_wake_of_the_storm.pdf Accessed on September 3, 2024.