

Minimizing Hunger In a Disaster: Advocacy Timeline

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When a disaster strikes, food banks and anti-hunger advocates are often on the front lines of relief efforts to provide food resources to those in crisis.

This brief is designed to help advocates understand the administrative and advocacy timeline to maximize the provision of public benefits and food assistance following a disaster.

Photos kindly provided by Redwood Empire Food Bank.

Before a Disaster Occurs:

Close participation gaps in SNAP, WIC, school meals & all federal nutrition programs

- Households whose members receive one or more of the following will be stronger going into a disaster situation and easier to provide with additional assistance.

Develop relationships with key partners

- State and local offices administering SNAP, WIC and Child Nutrition Programs.
- Voluntary Organizations Active in Disaster (VOAD), FEMA, state Office of Emergency Services.
- MOUs with food banks, Red Cross or the Salvation Army.

Ensure that State agencies have annual disaster plans with adequate anti-hunger tools

- Annual State SNAP Disaster Plans should include a detailed contingency plan for Disaster SNAP (D-SNAP), including education and application assistance, and factors the state will consider for food loss alone to be sufficient for D-SNAP eligibility.
- Request a state agency work group that includes advocacy stakeholders, if needed and depending on governance, include counties.
- Ensure state SNAP agency has relationships with utility companies, sister public agencies or others needed for data to support strong disaster declaration request.
- For food banks/emergency food providers, secure MOUs with each another, state agency for donated food, emergency TEFAP, etc.
- County/local offices to establish mutual aid with one another (send workers of appropriate language or extra Eligibility Workers), set up temporary eligibility hotlines, triage needs from existing caseload, or other actions.
- If possible – codify in state law these or other best practices available under federal law to respond to any scenario. E.g. California state law AB 607 (Gloria, 2017).

When Disaster is Imminent or Unfolding:

Sometimes signs of imminent threatening events, such as hurricanes, or unfolding events, such as the spread of wildfires, suggest the likelihood of disaster impact. In that case,

- Urge the state to consider requesting waiver authority for early distribution of the next month's benefits onto ongoing SNAP households' EBT cards.
- Print copies of the state Disaster SNAP Plan (and other nutrition program disaster plans) to advocate effectively on disaster relief policy and operational issues in case of power loss and access to electronic files and postings.

Post-Disaster Occurrence/Early Stages:

Maximize policy responses available for existing caseload and rules as well as D-SNAP

Partner with the State to prepare all appropriate federal waivers and declarations.

Encourage the state agency to work with the Governor's office to request a Presidential Disaster Declaration that includes Individual Assistance.

- Establish information feedback loops so that the state agency & administration has what they need to submit the strongest declaration request.
- Helpful information may include status of grocery stores, number of people evacuated in affected areas, lost workplaces, power outages, etc.

Advocate for SNAP policy requests, as appropriate, including for:

- Automatic mass supplemental benefits for people already receiving SNAP.
- Hot/prepared food waivers from FNS so that SNAP recipients can purchase such items with their benefits.
- Administrative relief such as authority to temporarily extend certification periods and periodic reporting requirements for ongoing households in the affected counties.

Advocate for WIC and Child Nutrition policies

Child Nutrition Program waivers allow schools to serve free meals to all children in the disaster area; allow schools and other providers to vary meal patterns from the normal requirements; expedite approval of summer meal sites; and facilitate meals to homeless children.

WIC policies allow modifications to the WIC food package; replace lost unredeemed WIC food benefits; use automatic income eligibility for participants of SNAP, Medicaid or TANF; modify WIC certification periods; and modify nutrition education components.

Advocating for D-SNAP—Interim Stage

Once Individual Assistance is granted, encourage the State to apply to USDA for D-SNAP as quickly as possible and monitor the process. Suggestions for D-SNAP request include:

- Benefit duration commensurate with the scope of the disaster: one month is common but severe disasters may warrant providing two or more months of federal D-SNAP benefits to households.
- Supplemental benefits along with replacement benefits for ongoing SNAP households to provide them the same benefit amount as a D-SNAP household.
- Adequate time for households to apply for D-SNAP (commonly a few days to a week but application periods can be longer and some states have a D-SNAP pre-registration built in to their systems to streamline D-SNAP enrollment).
- Face to face interview waivers to allow households to apply by phone.
- Eligibility for people who worked in the disaster area as well as for disaster area residents.
- Assist agency and trade associations to ensure SNAP authorized retailers are prepared for the new D-SNAP customer demand and to redeem SNAP benefits for purchase of hot/prepared foods when such waivers are in place.

During Disaster Program Implementation

D-SNAP

Monitor implementation for developments warranting additional action to:

- Extend 7 day D-SNAP application period and other waivers, add D-SNAP sites.
- Waive face-to-face interview requirement (if this has not been granted at the outset)
 - Document long lines, safety issues, need to serve caseload with disabilities, travel barriers, and/or other access issues. Prioritize phone interviews.

Education and Application Assisters

- Meet daily, even twice daily, to ensure effort is targeted and coordinated, share learnings, and compile feedback.

Emergency TEFAP

Monitor food banks and agency partners. Donations often spike and plummet, wrong items are donated, etc.

Communications

- Use all normal channels and methods to inform people about D-SNAP and think of new partners and channels to utilize as well, including social media.
- Do not jump the gun on publicizing news around D-SNAP. This includes approval of waivers “when approved but not actionable” etc.
- Community based organizations should carefully coordinate both internal and external communications (both with their communications and advocacy/policy teams).
- Prepare talking points for outreach workers and others assisting with D-SNAP outreach, providing talking points in other languages as needed.
- Work with local radio and media outlets to develop PSAs on where to get D-SNAP.
 - Work with state and county officials to ensure that press kits are available and identify spokespeople from the county and your organization.
 - Ensure local elected officials & media mention D-SNAP, not generic ‘food assistance’.

After Disaster Recovery Efforts

- Debrief! Gather as many people who participated in the policy & outreach efforts to collect learnings and feedback for administrators on what worked and what areas should be improved.
- Gather data on the persons served and federal dollars leveraged through the federal nutrition program disaster efforts, including the number of students in D-SNAP households who became newly directly certified for free school meals for the rest of the school year.
- Thank State, County, EBT processors, SNAP retailers, schools, health clinics and other stakeholders.
- Lift up the voices of disaster victims who received D-SNAP, school meals, WIC or other federal nutrition disaster aid.

After D-SNAP Implementation

- Advocate for policies, procedures and application assistance efforts that can help transition D-SNAP households who qualify for SNAP onto the regular program.
- Educate the public about how SNAP’s structure allows the program to respond quickly and efficiently, bringing federal dollars to the disaster area that stimulate economic activity.

Federal Statute

The Food Stamp Act of 1977, as amended (disaster program authorized in Sections 5(h) and 11(e)(14)): https://www.fns.usda.gov/sites/default/files/PL_106-580.pdf

The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, Sec. 412: <https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-actpublic-law-93-288-amended>.

Federal Regulations

USDA-FNS’s Proposed D-SNAP Rule: <https://www.federalregister.gov/documents/2016/05/10/2016-10923/supplementalnutrition-assistance-program-snap-disaster-supplemental-nutrition-assistanceprogram>.

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>.

California Association of Food Banks

Example MOU: <https://www.cafoodbanks.org/disaster-preparedness>.