



**MASSACHUSETTS
DISASTER SUPPLEMENTAL
NUTRITION ASSISTANCE PROGRAM
MANAGEMENT EVALUATION REVIEW
FEBRUARY 16TH – 17TH, 2012**

Conducted by:
Food and Nutrition Service
Supplemental Nutrition Assistance Program
Northeast Region



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ACRONYMS

ACS	Affiliated Computer Services, Inc.
BEACON	Benefit Eligibility And Control On line Network
BSI	MA Office of State Auditor Bureau of Special Investigations
CO	DTA Central Office
DSNAP	Disaster Supplemental Nutrition Assistance Program
DTA	Massachusetts Department of Transitional Assistance
EBT	Electronic Benefit Transfer
EPPIC	Electronic Payment Processing and Information Control system
FFY	Federal Fiscal Year
FNS	United States Department of Agriculture Food and Nutrition Service
FPM	DTA Financial Program Management
FPRS	FNS Food Programs Reporting System
HATS	DTA Fair Hearing Unit tracking system
MA	Massachusetts
MIS	DTA Management Information System
SNAP	Supplemental Nutrition Assistance Program
SSN	Social Security Number
TAO	DTA Transitional Assistance Office



TERMS & DEFINITIONS

Description	A summary of FNS observations, State agency's response to interview questions, post disaster report information, and results of FNS's case review.
Recommendation	Action suggested by FNS or State agency to improve or strengthen operations and procedures.
Key Issues	Concerns or problems encountered by the State agency which were felt to hinder program access or program integrity.
State's Best Practice	Statement of action that offers a best practice.

UNITS/PEOPLE INVOLVED IN REVIEW

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Claudette Champagne, DTA Director, Liberty Street Office
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Fiscal Year 2012 Massachusetts Disaster Supplemental Nutrition Assistance Program Management Evaluation

EXECUTIVE SUMMARY

On to February 16th and February 17th, 2012, the Food and Nutrition Service (FNS) staff conducted a Disaster Supplemental Nutrition Assistance Program (DSNAP) Management Evaluation of the Department of Transitional Assistance (DTA) compliance with 7 Code of Federal Regulations Part 280 and the FNS DSNAP Guidance, issued April 2008. Further, FNS used this management evaluation to explore best practices for disaster response and develop recommendations to improve federal and state DSNAP policies.

This report describes program areas reviewed at the State and local levels and the results of the evaluation of the State's performance and regulatory compliance. FNS would like to recognize DTA for the outstanding administration of its first DSNAP in mid-June in response to a series of devastating tornados that touched down June 1st, 2011 in central western Massachusetts (MA). FNS was impressed by the level of coordination and sophisticated systems that were developed in a matter of days to prepare for this operation, as well as the degree of customer service given to disaster victims seeking food assistance.

While DTA followed FNS DSNAP Guidance closely during the course of operation, FNS has identified some areas that could be improved upon by enhance planning and policy development. FNS advises the following critical recommendations be incorporated in the federal fiscal year (FFY) 2013 DSNAP State Plan:

- 1) Improve procedures to coordinate the reporting sources and reconciliation process to ensure disaster data can be compiled and reported out on a daily basis to FNS;
- 2) Enhance communications and relationships with utility companies in order to obtain power outage data immediately;
- 3) Develop methods to complete income, unemployment, and other matches to verify DSNAP case information during the post disaster review; and

- 4) Modify the DSNAP application to ask for (not require) income sources such as employment and use carefully worded public announcement to encourage (not require) applicants to bring in verification and proof of disaster expenses.

Several noteworthy initiatives are being recognized in this report which FNS feels contributed to the effective operation of the June DSNAP:

- 1) DSNAP information was disseminated quickly to various community contacts including media, public representatives, advocacy, community organization, and other disaster related sites;
- 2) DTA's designed Verification Checklist used at application, assisted documentation of verbal attestation and tracking documentation of disaster expenses and income sources;
- 3) DTA used a uniquely labeled pre-pinned Disaster electronic benefit transfer (EBT) card for the DSNAP client and EBT card reconciliation procedures were closely tracked throughout; and
- 4) DTA worked with their Electronic Payment Processing and Information Control (EPPIC) system vendor and DTA's Management Information System (MIS) during the DSNAP operation to quickly address reporting issues, implementing system fixes, and coordinating data sources.

Background

On June 1, 2011, tornados touched down in four counties in central-western MA. A MA Emergency Management Agency State of Emergency was announced for 19 communities. DTA was approved two days later for a 20% or 40% mass replacement waiver for four towns. On June 11 DTA was approved to extend individual replacement reporting by 10 days for 12 communities. While DTA waits for federal disaster declaration, the State agency prepares a disaster analysis and works with the Regional Office on a DSNAP request. On June 15, a federal Disaster Declaration for Individual Assistance is announced for Hampden and Worcester Counties. The same day DTA submits a formal DSNAP request to the Northeast Regional Office. By June 17, FNS approves a DSNAP operation for the month of June and several supporting waivers, including hot foods, early expungement, and supplements. DTA starts their operation on Saturday, June 18, at four sites: Springfield Liberty Street Transitional Assistance Office (TAO), Springfield State Street TAO, Southbridge TAO, and a Storm Assistance Center set up in Palmer. The application period runs seven days from June 18 to June 24. Citizens living or working from the following 12 communities were eligible to apply: Agawam, Brimfield, Charleston, Chicopee, Monson, Palmer, Springfield, Sturbridge, West Springfield, Westfield and Wilbraham. In total, DTA certified 5,054 households DSNAP benefits, totaling \$2,188,399, and denied 489 applications. Supplements were issued to 5,578 Supplemental Nutrition Assistance Program (SNAP) households with a total issuance of \$990,836.

Scope

To assess the State's actions in preparing for, operating, and reviewing the June 2011 DSNAP operation in Hampden and Worcester counties. FNS reviewers examined each Program Area described in the DSNAP Guidance and examined DSNAP case files.

Methodology

FNS gathered management information through interviews with DTA Directors, Assistant Directors, and Program Coordinators. Supervisors and case workers were interviewed on certification and verification procedures. All twenty-six cases sampled from DTA's Post Disaster Review were re-evaluated by FNS reviewers. DTA's standalone disaster system, called EPPIC, was observed.

Publication Notification & Outreach

Description: The same day the DSNAP was approved, DTA 1) released a prepared press release on locations and times of the DSNAP centers; 2) posted a story and frequently asked questions on the DTA website; 3) posted DSNAP information on a State storm recovery website; 4) issued a public service announcement; 5) informed local legislators; 6) hung DSNAP posters around the TAOs, disaster recovery centers, and DSNAP sites; and 7) issued operation memos and emails to all DTA staff. DTA worked with FNS to release a retailer notification in the two counties where a hot foods waiver was approved for. The DTA commissioner was designated as the spokesperson for the media.

During the interview with management staff, it was expressed that during disaster recovery there were many competing messages to the public. DTA recognized that the availability of food assistance through the DSNAP needs to be repeated to the public often. DTA thought improvements could be made in television exposure and outreach to the elderly. As well, they felt some potential applicants were turned off by the stigma of welfare attached to the SNAP name and changing the name of the program would help. Word of mouth appeared to play the biggest role in notification, though clients also heard on the news and saw the DSNAP tent outside the TAO.

FNS Recommendations:

- Issue press release to local television stations.
- Target hard to reach populations such as the elderly. Consider outreach at senior centers and housing.
- Continue messaging on DSNAP operation throughout application week.
- Consider delaying start of DSNAP operation to enhance early public notification and lessen competition with more immediate disaster assistance and news coverage.

State's Best Practices to Share:

- DSNAP information was disseminated to various community contacts including media, public representatives, advocacy, community organization, and other disaster related sites.
- DTA designated early on a single Public Affairs contact which all media inquires and announcements went through.
- DSNAP information was posted on the DTA website and special messaging added to the EBT call center.

Locations & Operational Structure

Description: DSNAP site locations were chosen by the Executive Office of Public Safety. Specific locations were decided internally then announced in a press release June 3, 2011. There were four sites open Saturday to Sunday, 7AM to 7PM (interviews started at 8AM). The crowd numbers were approximately over 5,000 applicants, one-fifth of the original estimate.

Greeters were stationed in front of the DSNAP site to direct applicants to appropriate starting points, answers general questions, and identify those who may have special needs. SNAP clients applying for replacements or supplements were directed to a separate line or area. Logs were kept of both SNAP and non-SNAP applicants. Non-SNAP applicants were given a number once logged in and had a designated waiting area. Average wait time was less than a half-hour though it could vary during the day. A case worker would interview the client, complete the application, and verify eligibility using a verification checklist. For questionable cases, a supervisor or manager would be on site to look over a case for a second time. A supervisor review would be necessary before a denial was issued. For denied cases, a manual denial notice was given with fair hearing information. Approved applicants were escorted to another waiting area for card issuance. Two DTA workers manned the card issuance table and provided brief training, answer questions, and have applicants sign a log next to a number that corresponded to their issued DSNAP EBT card. Second visits by clients were only necessary if critical verification was missing in the first visit. Within 2-3 days of application, benefits on the DSNAP EBT card activated after the client was screened for duplicate participation.

DTA staff at the DSNAP site wore brightly colored hats and shirts. Most staff worked long hours and had to take precautions against heat stroke. A church supplied food and water bottles were stocked on site. Police presence was valuable for directing traffic, parking and directing applicants to site. The city provided additional bus service to the site. DTA described a bottleneck forming at the card issuance table and a large number of SNAP clients showing up to request additional benefit replacements. In Springfield, SNAP clients were directed to the TAO and new DSNAP applicants to a tent outside of the TAO. Central Office (CO) and other TAOs from across MA assisted DSNAP operations by processing applications and SNAP replacements requests.

FNS Recommendations:

- To assist client flow through DSNAP site, hold group training sessions for the EBT Disaster Card while clients wait for turn at card issuance table.
- Dedicate a set of reporting staff to assist compiling daily disaster numbers.

State's Best Practices to Share:

- Physical separation of DSNAP applicants from regular SNAP clientele at TAO site. The use of outdoor tents as the DSNAP sites proved very effective, particularly with the mild season.
- Use of visual cues like signage and tent to help applicants identify DSNAP location and traffic flow. Use uniform brightly colored shirts and hats to identify DSNAP staff.
- Utilizing police and city services to assist crowd control and transportation.
- Consider comforts of staff and clients, especially with weather conditions, long hours, stress, and emergency needs.

Policy Dissemination & Issues

Description: DSNAP policies were disseminated to staff through operation memos. DTA sent operations memos to FNS for review. Eligibility workers received a briefing the day before and the morning of the start of the DSNAP operation. Workers were updated during shift changes. Supervisors and managers were stationed at each DSNAP site to assist with policy questions. Printed eligibility and benefit reference tables were available in the interview areas. Daily phone calls were held with the CO and the TAO management to update and resolve issues. DTA's SNAP Director maintained close communication with FNS throughout.

DTA found that the DSNAP application was not specific enough about income sources and this resulted in difficulty verifying financial eligibility during the post disaster review of cases. DTA found some overlap with applicants who were waiting for SNAP case determination and applying to the DSNAP. It was also hard to identify SNAP clients at zero benefit level who were automatically matched as a duplicate participate yet could be eligible for DSNAP. The State agency commented that DSNAP brought in applicants who were hard to reach in the regular program and served as an outreach tool for SNAP participation.

FNS Recommendations:

- DTA could modify the DSNAP application to ask for (not require) income sources such as employment.

State's Best Practices to Share:

- DTA CO and DSNAP site staff held daily calls during the operation to manage updates and discuss policy and procedure.
- Supervisors were available at each DSNAP location to assist eligibility workers with policy questions and give secondary reviews to questionable cases.

Staff Training

Description: Training occurred in a short time frame prior to the DSNAP operation starting. An operation memo was released to staff June 17, 2011 and most TAO staff was briefed the afternoon before the operation started. A Financial Program Management (FPM) representative provided a “train the trainer” session on the EPPIC system. DTA stated there has not been an annual training on the DSNAP. Eligibility workers interviewed said it was at first challenging to remember the different eligibility rules in DSNAP in the short time before the operation started. Income tables, policy binders, and supervisors on site assisted the learning process.

FNS Recommendations:

- Recommends holding an annual DSNAP plan training or run mock operations to prepare staff for future disaster response.

State’s Best Practices to Share:

- Using “Train the Trainer” sessions to quickly train staff on disaster eligibility system.

Automated Systems

Description: DTA worked with their EBT vendor, Affiliated Computer Services, Inc. (ACS), to build a standalone DSNAP eligibility system named EPPIC. EPPIC is an administrative terminal with special screens for entering and managing DSNAP cases. It does not interface with DTA’s SNAP eligibility system called Benefit Eligibility And Control On-line Network (BEACON). Duplicate participation checks must be conducted in EPPIC and then BEACON for each case. The CO staff and the Tauton TAO assisted with data entry and checks. Up to 50 staff members were needed at the height of the operation for case processing. EPPIC could update in real time, though DTA opted for batching. Approved cases were batched to ACS and benefits would be available on the client’s EBT card the next day. The backup to EPPIC would be sending DSNAP applications and card numbers directly to ACS to establish the case and issue the benefit.

At the time of the operation MIS was not able to network laptops at the DSNAP site back to CO so applications had to be initially faxed then scanned to the CO for processing. EPPIC had three layers of user security roles available to DTA: Administrator, Event Coordinator, and Worker. Replacements and supplements were issued to SNAP clients in BEACON. Unique identifiers for new replacement and supplement values had to be added to reference tables.

FNS Recommendations:

- Ensure EPPIC is laptop portable if case data processing becomes necessary on site.
- Conduct EPPIC training ahead of time and run mock DSNAP to look for data processing and reporting issues in different disaster scenarios.
- Prepare new coding in BEACON in the event of multiple or varied disaster situations.

State's Best Practices to Share:

- Well-designed standalone DSNAP eligibility system with backup solution in place.
- During course of operation, DTA recognized system and reporting issues early on and utilize vendor and MIS for urgent fixes. Response times from vendor and MIS were immediate.

Certification & Verification

Description: DSNAP applications were only available onsite. Eligibility workers were able to do some prescreening for applicants prior to the interview. To address language barriers, some staff on site were multilingual; some applications and posters came in Spanish; and the Qwest Telelanguage Line was available. There were no home visits or mailed in applications, though some applicants sent authorized representatives. The most common form of identification was a driver's license. Passports, school identification, collateral contacts and town registers were also utilized. Applicants who came with no identification to one DSNAP site were able to visit a nearby Registry of Motor Vehicles (RMV) to obtain temporary identification. Residency could be verified with the above identifications or with utility bills, tax bills, or insurance policies. For those who lived outside of the 12 communities designated for DSNAP but worked in one of the communities, additional information was sought on employment details. Eligibility workers went through a DSNAP Verification Checklist with each applicant. Documents, verbal attestation, or collateral contact were needed. Further, clients had to sign an Affidavit of Loss or Income or Disaster Expenses form. The only mandatory verification was identity.

The State agency struggled with certifying disaster expenses. Most expenses had to be taken as self-declarations. DTA noticed that after awhile applicants learned how to fill out an acceptable application and workers would see similar patterns of expenses. Due to FNS DSNAP policy, it was hard for workers to question these expenses. DTA would like to strengthen the income verification next time and ask for place of employment on the application.

FNS Recommendations:

- DTA could modify the DSNAP application to ask for (not require) income sources such as employment.
- DTA should consider modifying the DSNAP application to ask if the applicant is a state worker. If the response is positive, the application should be reviewed by a supervisor.
- Use carefully worded public announcement to encourage (not require) applicants to bring in verification and proof of disaster expenses.
- Post a pre-screening form online to inform applicants of some basic criteria for eligibility and encourage bringing verification documents.

State Best Practices to Share:

- DTA's designed Verification Checklist assisted documentation of verbal attestation and tracking documentation of disaster expenses and income sources.

- DTA provided multilingual staff and a Telelanguage Line for non-English speaking applicants.
- Directing applicants to nearby local government departments, like the RMV or the post office, for needed documentation.

Issuance

Description: Issuance of an EBT card was done on site after a client was found eligible in their interview. Clients signed for the card on a log sheet containing the card number, the date, the clerk's initials and the client's printed name. Client training included verbal explanation at the issuance table and giving out the standard EBT brochure. The EBT call center also had a specialized message for DSNAP. EBT disaster cards resembled the regular Bay State Access card but had the term "Disaster Card" displayed in the client name field. Disaster cards were pre-numbered and pre-pinned. Cards were unfunded when given to the client and prior to the case being established in EPPIC. Once in EPPIC, the DSNAP amount was based on the household size and FFY 2011 benefit table. Twenty-four hours were allowed for duplicate participation checks then the benefit was made available after midnight on day three.

Disaster cards are stored in three locations in MA. DTA utilized the Springfield Liberty TAO site for the majority of the supply. A DTA auditor distributed disaster cards to each DSNAP site using a predetermined amount of cards and signing a receipt with each TAO Director or designee upon removal of cards from one TAO and delivery to another. In addition to written procedures, card issuance process and reconciliation were monitored by the auditor at the DSNAP sites. EBT cards were secured in a lock box every night. At the end of the DSNAP, all disaster card stock was successfully inventoried, reconciled, and extra stock returned to long-term storage.

ACS developed several reports for DTA to monitor issuance including daily disaster benefit issuance and monthly disaster benefit expungement. One-time queries were also available for daily numbers in June 2011 and a listing of all clients issued a disaster card and/or benefits between June and August 2011.

DTA was approved for an early expungement waiver. The first expungement began in late October 2011. This was not advertised to clients and DTA reported hearing only one client complaint about expungement.

FNS Recommendations:

- Inform clients during EBT card training session about shorten expungement timeframe.

State's Best Practices to Share:

- DTA designed a uniquely labeled pre-pinned Disaster EBT card for DSNAP clients.
- Sufficient numbers of Disaster EBT cards are kept stocked in three locations in MA.

- DTA maintain rigorous auditing, reconciliation and security protocol throughout DSNAP operation.
- DTA requested customized reports from their EBT vendor to monitor DSNAP issuance.

Ongoing SNAP Clients

Description: Ongoing SNAP clients in designated areas were approved for replacements and supplements. DTA discovered early on that BEACON could not distinguish between individual replacements and mass replacements however DTA was able to develop new coding within a few days of the operation. Due to DTA's staggered issuance of benefits, BEACON was programmed to issue a 20% automatic replacement of May's benefit if a head of household's social security number (SSN) ended in 0, 1, 2, 3 or 4 and 40% automatic replacement if their SSN ended in 5, 6, 7, 8 or 9. Mass automatic supplemental benefits were handled similarly in BEACON for the three towns that received waiver approval. Individual supplements for June and replacements for May were allowed to be applied for in designated areas.

The State agency found that processing SNAP replacements was burdensome and wished replacements were completely automated so more focus could be placed on DSNAP at that time. As well, DTA found power outage data inaccurate for some areas in determining food loss, especially considering the nature of the tornados left some areas in the same zip code untouched and other areas devastated.

FNS Recommendations:

- Preplan various scenarios of issuing mass replacements at different points in the month based on staggered issuance cycle.
- Explore other forms of collateral contact to support food loss claims.
- Better public messaging on automatic replacements to reduce number of SNAP clients coming to office during DSNAP operation. Develop a procedure for SNAP clients seeking over the automated replaced amount and direct this client traffic away from DSNAP site.
- Improve communications and relationships with utility companies and state emergency management contacts in order to obtain power outage data immediately; if possible, on day of impact. Work with power companies on developing more precise power outage maps.

State's Best Practices to Share:

- During DSNAP, DTA quickly implemented programming fixes in BEACON to properly identify mass replacement benefits from individual replacement benefits.

Retailers

Description: DTA did not develop special notification to retailers. When the Hot Foods waiver was approved by FNS, DTA worked with FNS's Field Office to develop a FNS notification to authorized retailers in designated areas. DTA did not hear complaints from clients or retailers about accepting the Disaster EBT card at food stores.

State's Best Practices to Share:

- While FNS notified retailers in the affected area of the allowable hot food waiver, DTA also requested that retailers be informed of a new and unique EBT card. This would prevent any potential issues that would raise retailers' suspicion of counterfeit EBT cards.

DSNAP Client Integrity

Description: DTA observed during the operation that applicants learn quickly by simply standing in line for benefits what will make them eligible. Workers did see a pattern but there really is no way to fully verify income and expenses under DSNAP policy. In this operation, SSNs were readily provided by clients. Questionable cases were reviewed by supervisors and an on-site fraud investigator was available. Most questionable cases involved discrepancies with household composition and homeless individuals.

DTA conducted duplicate participation checks using match reports. Within EPPIC, ACS performed three matches on the batches sent over each evening. The demographics of household members for new cases were run against previously established disaster cases. ACS would transmit a daily disaster extract file of new DSNAP client demographic information back to DTA. DTA would run this extract against BEACON to look for matches with established SNAP cases.

Reports about duplicates from EPPIC and BEACON were made available to DTA's FPM staff. Initially FPM staff would cancel benefits when matches were found, however DTA's TAO staff took over the review of these reports since some cases were still eligible for DSNAP (due to late recertification or had applied for SNAP but had not received benefits yet). TAO would alert FPM if a benefit should be appropriately cancelled.

FNS Recommendations:

- Inform state agency employees about special audit of 100% review of employee DSNAP applications.
- Consider second party or supervisory reviews for any state agency employees application before issuance.

Best Practices:

- DTA had a fraud investigator on site at the DSNAP sites who was available for consultation.
- Though checks had to be done in two steps in two different systems, DTA conducted required duplication participation checks among DSNAP applicants and SNAP recipients.
- DTA self-corrected mid-way through the operation when the policy unit realized that some duplicate SNAP matches would be eligible for DSNAP under special circumstances.

DSNAP Reporting and Post Disaster Review

Description: For DTA, daily reports were challenging to deliver with the staff resources, operation novelty, and turnaround time. Administration and FPM prepared the New Approved portion. Ongoing Approved was completed by SNAP unit staff. Other numbers were pulled from MIS and EPPIC reports. Offsite daily case processing was necessary to keep up with volume and reporting demands.

The FNS-292B report was compiled by the DTA SNAP Director using MIS's and the SNAP Unit's cumulative totals from the daily DSNAP reports, and then submitted through FPM into FNS Food Programs Reporting System (FPRS) August 23, 2011. The report was rejected by FNS initially due to a discrepancy in dates of application and benefit periods. It was resubmitted September 12, 2011.

The Post Disaster Review process began with several meetings held with key staff from the CO, Springfield, Holyoke, Southbridge and Worcester. Disaster plan protocols and operation polices were reviewed and discussed. The case file review started with a random selection of cases. No DTA employee cases were found in the case population. The Local Office Quality Control staff reviewed the cases. In retrospect, DTA wishes it started the case review earlier since the agency found that it lacked the usual verification methods available for SNAP cases in BEACON. DTA reflects that sending sampled cases to the State's Bureau of Special Investigations (BSI) ahead of time would have allowed some additional verification matches to be done on unemployment benefits and employment income.

Case Review Summary			
<i>Case Statistics</i>	<i>Benefits Availability</i>	<i>Client Interview</i>	<i>Benefit Level</i>
5,054 new DSNAP cases 489 denial cases 26 approved cases sampled by DTA & FNS	Timely: 25 Untimely: 1* *One case had benefits issued 15 days beyond certification date	Yes: 8 No: 18	All 26 cases had correct benefit level determination
FNS Conclusion: FNS's case file review validated the results of the DTA's post disaster review and report.			

FNS Recommendations:

- DTA must develop a method to complete income, unemployment, and other matches to verify DSNAP case information during the post disaster review according to DSNAP Guidance. Since regular data matching for SNAP cases relies on cases being in BEACON (which DSNAP cases are not), FNS recommends DTA begins the case sample selection early after the DSNAP operation ends and refers cases to BSI for verification of client information; or, evaluate other methods to verify sources of income.
- DTA should attempt at least two phone calls when contacting a client for an interview. If the phone number does not work, consider locating another phone number or mail a request for contact at the last known address or through another third party contact like the post office or RMV.

- In view of the challenges DTA had with Daily Reporting, FNS recommends procedures are developed in DTA's Disaster Plan to coordinate the reporting sources and reconciliation process to ensure data can be compiled and reported out on a daily basis to FNS. Also consider assigning a staff member to be the reporting liaison to FNS during the operation and for the later FNS reports.
- Additionally, explore electronic applicant sign-in that can be uploaded to EPPIC to capture and compare to new and approved DSNAP cases for assistance in tallying daily numbers.

State's Best Practices to Share:

- DTA worked with their EPPIC vendor and MIS during the DSNAP operation to address reporting issues, implementing system fixes, and coordinating data sources.

Fair Hearings & Claims Management

Description: Applicants who were denied DSNAP eligibility received a manual denial notice which contained fair hearing information. Fair hearing process followed regular SNAP procedures. The DTA Hearing Unit noted the code "DSN" in their tracking system, called HATS. Overall DTA received 14 requests for fair hearings. Out of the 14, two were found favorable to the appellant, others were denied, dismissed or abandoned.

Claims were established following DTA's claim management plan. DTA's claims unit reported that standard procedures were followed. TAO staff would submit referrals relating to any potential claims that were identified. EPPIC reports were utilized to identify whether two payments were mistakenly issued for the same household; those cases identified would have overpayment claims established. Reviewing EPPIC reports before issuance alerted DTA to possible duplicate issuances before the benefit released, which allowed the State agency to avoid many potential overpayments.

FNS Recommendations:

- Consider developing unique claim establishment criteria for DSNAP if DTA's regular establishment threshold levels negate establishments of the average DSNAP overpayments discovered.

State's Best Practices to Share:

- DTA provided fair hearing information in client denial notice.
- DSNAP fair hearings were specially coded in DTA's fair hearing tracking system.

State Agency Input on Key Issues

- Identifying and managing SNAP replacements and supplements was resource consuming and burdensome for DTA. During the DSNAP, DTA wanted to focus on the operation, however that was made difficult since numerous SNAP clients showed up to request individual replacements. SNAP clients who received a 20% or 40% automatic mass replacement still came to the TAO to request the difference. DTA staffing was diverted to service these clients and other TAOs stepped in to help process the requests. DTA is requesting that FNS consider more generous automatic mass replacement and supplement waivers be allowed under certain disaster situation to reduce the administrative burden on the State agency.
- DTA expressed to FNS that they would run the DSNAP a little differently on reflection of their recent experience. Overall, DTA conceded that most of the operation decisions made for this DSNAP were reactive to the tornado events instead of from proactive disaster planning. For one, DTA would assign more administrative staff to help with processing applications. DTA also would consider delaying the start of the DSNAP to a later time since most of the disaster victims were still addressing immediate needs and were overwhelmed with other forms of assistance at the time.
- Daily reporting was a significant challenge during the operation. DTA is considering whether a system can be developed to help with the reconciliation process.
- DTA's DSNAP application was developed from a FNS template. During the post disaster review, it was discovered that the applications did not provide the needed client information, such as place of employment, to conduct appropriate verification checks on client resources. DTA is requesting FNS provide guidance on how to do verification checks on the limited client application data. FNS has suggested to DTA that the DSNAP application can be modified to request (not require) employment and other specific resource information.
- DTA is asking FNS if the DSNAP could be renamed. DTA thought that some eligible citizens did not apply for disaster assistance because of the perceived stigma of the program name being tied to a welfare program.
- DTA's feedback to FNS included the concept of disaster assistance being maintained at the federal level. DTA felt that FNS would be better equipped to do public notification and coordinate with other federal agencies assisting disaster victims, like FEMA. This would also allow DTA to enhance its level of service to SNAP clients during the disaster recovery.
- DTA frequently stated that having remote assistance from other DTA offices helped a lot with processing DSNAP applications and diverting regular caseload work.