

## **SNAP Pandemic Planning Guidelines**

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In a event of a declared pandemic, SNAP State agencies will need to deliver SNAP services under a combination of conditions unlike those of any other disaster. Since Disaster SNAP is not a likely or practical response to a pandemic, State agencies must work within their agency and with State-level pandemic planning authorities to update their pandemic plans to reflect this new direction.

State agencies should begin assessing their organizational needs and making necessary changes soon to ensure readiness for any severe pandemic conditions that occur in the short term. State agencies should also assess their business processes and technology to ensure that systems are capable of functioning in the most efficient manner possible.

State agencies must ensure the continuity of, and safe access to, SNAP during severe pandemic conditions or periods of social distancing. Should the pandemic be severe or prolonged, there may be an increase in demand for SNAP benefits due to income lost due to illness or unemployment resulting from the pandemic. State or local agencies may be called upon to operate SNAP with reduced or no face-to-face contact in order to reduce diseases transmission.

The tables that follow provide information and resources that should be helpful to State agencies as they begin or continue the work of SNAP pandemic planning.

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## Current SNAP Flexibilities

State agencies should always be prepared to use the following program flexibilities in the event of declared pandemic.

Requirement	Summary
Application Filing 7 CFR §273.2(c)(1)	<ul style="list-style-type: none"><li>• Allow clients to file applications by mail or telephone, or online.</li><li>• Develop a mobile application or mobile-enabled website for households to apply, submit verification, and report changes.</li></ul>
Interviews 7 CFR §273.2(e)(2)	<ul style="list-style-type: none"><li>• Substitute telephone interviews for face-to-face interviews.</li></ul>
Certification Periods 7 CFR §273.10(f)	Extend maximum allowable certification periods: <ul style="list-style-type: none"><li>• 24 months for households in which all adult members are elderly or disabled</li><li>• 12 months for all other households.</li></ul>
Verification 7 CFR §273.2(f)	<ul style="list-style-type: none"><li>• Maximize use of verification through online databases to reduce paperwork.</li><li>• Consider document imaging technology or electronic submission of verification documents.</li></ul>
Issuance and Redemption	<ul style="list-style-type: none"><li>• Replace any aspects of EBT card issuance that are currently only available by an over-the-counter method with card issuance by mail.</li></ul>
Work Requirements & E&T	<ul style="list-style-type: none"><li>• Consider whether it is appropriate to determine that circumstances beyond the individual's control provide good cause for the individual to not meet the work requirements. Applying good cause would allow households that do not meet the ABAWD work requirements or mandatory employment and training (E&amp;T) requirements to continue receiving SNAP benefits.</li></ul>

## Process and Technology Assessment

State agencies readying their operations for reduced or no face-to-face contact with SNAP clients should assess the following process and technological considerations.

Process	Question
Mail	<ul style="list-style-type: none"> <li>• Can your mailed application system (mailroom, mail distribution, key entry of application data) accommodate the anticipated volume of paper applications?</li> </ul>
Telephone and Call Centers	<ul style="list-style-type: none"> <li>• What is the maximum volume of incoming and outgoing calls can your telephone system accommodate?</li> <li>• What happens when the system is overloaded? Do callers get a hold message, busy signal, or are they disconnected? Can they leave a message and receive a call back or enter a queue to receive a call back?</li> <li>• Do you have a staff person answering the main line or automated system that will allow clients to proceed to their intended destination without having a bottleneck at a reception?</li> <li>• Do you have Interactive Voice Response (IVR) functionality that allows clients to obtain general and case-specific information?</li> <li>• Do you have call center software that allows you to track calls and distribute calls to staff?</li> <li>• Do you have the capacity for automated outbound calls to clients to give them information about changes to policy (like extended certification periods)?</li> <li>• Do you have, or can you implement, voice signature technology?</li> <li>•</li> </ul>
Systems & Technology	<ul style="list-style-type: none"> <li>• Do you have a web-based, online application?</li> <li>• A mobile application or mobile-enabled website?</li> <li>• Do you have manual or automated distribution of submitted web-based applications to staff?</li> <li>• Do you have an online case management system? Online case management allows households to perform a variety of routine tasks related to their SNAP case through a web-based portal. Case management tasks may include viewing case information and/or notices, reporting changes in factors that affect eligibility or benefit level, and/or uploading documents.</li> <li>• Do your servers have the capacity to handle increased web traffic?</li> </ul>
Staffing	<ul style="list-style-type: none"> <li>• Can you estimate what percent of your workforce will be absent from work during various stages of the pandemic? See <a href="https://www.cdc.gov/flu/tools/fluworkloss/">CDC  Pandemic Influenza (www.cdc.gov/flu/tools/fluworkloss/)</a>.</li> </ul>

Process	Question
	<ul style="list-style-type: none"> <li>• Which non-technical Program activities can be postponed until after the pandemic has ended?</li> <li>• How will you train staff to temporarily transition from non-critical tasks to critical ones?</li> <li>• Do you have telework policies and systems access that will allow your staff to work remotely?</li> <li>• Do you have case banking or electronic case files so you can move work should some offices need to close or staff need to work remotely? Electronic case files may include imaging paper files, such as paper applications or verifications, through the use of document imaging technology and/or receiving case file documents electronically (e.g. through an online portal, mobile application, email, etc.).</li> <li>•</li> </ul>
Issuance	<ul style="list-style-type: none"> <li>• Do you have enough EBT cards on hand to accommodate a potential increase in caseload?</li> <li>• Have you considered pre-pinning EBT cards so that the number of calls to the customer call center is reduced?</li> </ul>