

**Addenda 4**  
**Oklahoma Department of Human Services**  
**Disaster Supplemental Nutrition Assistance Program State Plan**  
**FFY 2014**

**Introduction**

Damages sustained as a result of natural disasters vary and are impossible to completely prepare for. This disaster plan will provide general solutions adaptable to all situations. This plan is to be used in conjunction with the FNS Disaster SNAP Guidance of April 2013.

The Oklahoma Disaster Supplemental Nutrition Assistance Program (DSNAP) plan incorporates the use of the Electronic Benefits Transfer (EBT) system with magnetic stripe cards as the vehicle for delivery of Disaster SNAP benefits. The public utilities necessary to utilize EBT as the delivery vehicle in SNAP disasters may not be available within hours of natural disasters such as tornadoes or ice storms but the necessary public utilities, electricity and telephones, can in most instances be restored within one to twelve days from the date of the disaster. Most disaster sites are not made operational until five to ten days from the date of the disaster because of the preparation necessary in declaring SNAP disasters and establishment of on-site locations. OKDHS will choose sites outside of the disaster area when large numbers of people have left the disaster area.

Any DSNAP that will be approved by FNS must begin with a Disaster Application by the Department of Human Services (OKDHS). The application can be made informally by telephone so it can be approved without delay but must be later submitted in writing to the Food and Nutrition Service within twenty-four (24) hours of the informal request. The formal application shall include the information below.

<b>Requirement</b>	<b>Specifics</b>
Date and type of disaster	
Description of geographical areas in need of assistance	Provide a map, if available. Provide specific description of affected areas within each county.
Statutory prerequisite	A statement that commercial channels of food distribution are available (or estimate of when they will be restored), and a statement that either: a presidential declaration has been granted, or commercial channels of food distribution were disrupted
Determination that low income households have lost food or are unable to purchase nutritious food	Assessment data

<b>Requirement</b>	<b>Specifics</b>
Estimate of the number of households total figure expected to apply	Total figure broken down by on-going and new applicants
Recommendation of length of application period	Not to exceed seven (7) days
Description of security resources available	To protect issuance documents/benefits; to protect staff; for crowd control
Fraud control measures	Plans to conduct checks for duplicate participation; preventing fraudulent applications; ways to deal with suspected fraud
Description of process by which applications will be processed and benefits issued	where applicable, specify different procedures for: on-going SNAP participants, new applications, special needs groups (e.g. elderly/disabled, SSI recipients)
Plans for notifying public of disaster program availability	The State will notify public of disaster program by press releases and Public Service announcement.

**Responsibilities**

The primary responsibility for operating a DSNAP rests with OKDHS. The resources of the Federal government through USDA-FNS supplement the State’s efforts.

The Federal Emergency Management Agency (FEMA) is the Federal Agency charged with the overall management of the Federal response in presidentially declared disasters. FEMA has grouped the types of assistance a State is most likely to need into twelve Emergency Support Functions (ESF) with each ESF having a lead agency for this assistance. The Food and Nutrition Service (FNS) is the lead agency within The United States Department of Agriculture (USDA) for ESF-11. The FNS Disaster Task Force coordinates all ESF-11 activities within USDA, FEMA, other support agencies and local disaster officials. USDA can provide food to the American Red Cross for mass feeding, emergency food distribution to households and/or disaster SNAP assistance to fulfill its responsibilities for food assistance under ESF-11. FEMA will provide information on State, local, and private resources for food to help determine the types and quantities of food FNS must provide.

The OKDHS Incident Command System is integrated into the State and Local level Office of Emergency Management, OKDHS along with volunteer, private, and community organizations are integrated into the Emergency Operations during a disaster or emergency event. The State Office of Emergency Management is the lead response agency within the State of Oklahoma when disasters occur and all coordination of response and resource coordination flows from the Emergency Management, Command Center.

OKDHS works in conjunction with all of the support organizations to fulfill the Human Services needs, deployments, and responses with in the affected areas. The State of Oklahoma has multiple support organizations that are activated, depending on the type and level of disaster and identified needs, some of those support organizations are:

1. The American Red Cross
2. The Salvation Army
3. The Baptist Men's Disaster Relief
4. Feed the Children
5. Multiple Community Faith Based Organizations
6. Multiple Community based Organizations

## Contact List

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### **The Disaster Declaration**

“As the DSNAP provides an entire month's benefits and is administratively challenging for State agencies to deliver, FNS must target DSNAP resources to areas where they are most needed. Therefore, for the vast majority of disasters, FNS has elected to approve the operating of the DSNAP under the Stafford Act authority when affected areas have received a Presidential declaration for individual assistance. However, FNS will consider other requests if an extraordinary situation occurs.”

Authority to operate a DSNAP is found in the Food Stamp Act of 1977, as amended, and the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988. The Secretary of Agriculture has discretion to operate a DSNAP

under both authorities pursuant to the Food Stamp Act and Executive Order 12673, which delegated the President's Stafford Act authority to the Secretary. Provisions of the Stafford Act require a Presidential declaration of "Major Disaster" and that the commercial channels of food distribution are available. The Secretary of Agriculture can invoke provisions of the Food Stamp Act in declaring SNAP disasters when commercial channels of food distribution are disrupted and the commercial channels of food distribution subsequently become restored.

According to Federal Regulations the Secretary of Agriculture shall, after consultation with the official empowered to exercise the authority provided for by Section 302 (a) of the Disaster Relief Act of 1974, 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. The Secretary of Agriculture also shall provide for emergency allotments to eligible households to replace food destroyed in a disaster. Such emergency allotments would be equal to the value of food actually lost in such disaster but not greater than the applicable maximum monthly allotment for the household size.

The disaster declaration will include the geographic boundaries of the areas included in the disaster; number of houses and businesses destroyed or damaged by the disaster; availability of commercial channels of food distribution; and, begin/end dates for the distribution of disaster SNAP benefits.

### **Assessment**

Because of the uncertainties of natural disasters such as tornadoes or ice storms, disaster preparedness must be broad enough to be customized to fit each disaster. The assessment phase of each disaster occurrence is critical in determining the resources needed to cope with the disaster. The damage to affected areas will determine if the disaster is manageable with the existing SNAP or if other State and Federal resources must be requested. The number of residents in the affected area, the economic base of the community, the damage to structures and the time anticipated for return to normal conditions will all have bearing on the type of disaster response. FEMA and the Office of Emergency Management (OEM) are responsible for assessing the damages caused by the natural disaster and for providing specific information to Family Support Services Division (FSSD) and Field Operations Division (FOD). AFS will participate in the evaluation of each disaster and cooperate with FEMA and FNS to ensure that the appropriate response is made to each disaster situation. OKDHS will communicate with FEMA and OEM to gather and evaluate demographic data in the disaster areas to determine income levels, percent of elderly population, percent of infant population, and primary language spoken.

## **Levels of Disaster Response**

FEMA has developed a three-tier protocol with Level III being the most severe and widespread. Levels I and II disasters may leave SNAP recipients in need of replacement benefits. In most cases, however, the degree of these disasters may not reach the level where a DSNAP is approved. A description of the three-tier protocol is found in the next section, 'Agency Responsibility and Response'. Oklahoma has adopted the use of the FEMA categories in determining the level of response to a disaster declaration.

## **Agency Responsibility and Response**

### **Level I Disaster**

When the disaster is defined as Level I, OKDHS will implement a response with existing SNAP rules. These efforts will primarily be focused on replacing food for SNAP recipients damaged or destroyed in individual household misfortunes. Replacement procedures are outlined in the FNS Disaster SNAP Guidance of April 2013 and in our state SNAP policy section, "340:50-11-64 – Destroyed food purchased with benefits":

*340:50-11-64. Destroyed food purchased with benefits*

*Revised 6-1-13*

*(a) In households where food purchased with benefits is destroyed in a household misfortune such as a fire, tornado, or flood, a replacement of the actual value of loss, not to exceed the household's monthly allotment, may be made if the loss is reported within 10 calendar days of the loss and the loss is verified. Food loss through loss of electricity or malfunction of appliances unless caused by a household misfortune, does not qualify for a Supplemental Nutrition Assistance Program (SNAP) replacement. • 1*

*(b) Prior to issuing the replacement, a household member must complete Form 08FB0012E, Request for Replacement of Destroyed Food, attesting to the loss within ten days of the report of the loss. When the Oklahoma Department of Human Services is not open for business on the 10th calendar day, the form must be received by the next business day. The worker must issue the replacement within 10 calendar days of the reported loss or within two business days of receiving the completed form, whichever is later.*

### **INSTRUCTIONS TO STAFF 340:50-11-64**

*Revised 6-1-11*

1. *The worker processes the replacement using the Food Stamp Replacement (FSRP) transaction. The worker documents in Family Assistance/Client Services*

*case notes each request for replacement, the date requested, the reason, and if the replacement was provided.*

Local county office facilities are capable of meeting the needs of recipients in this type of disaster response. Discretion of local county directors will prevail when requests for disaster assistance are made with each request considered individually. Electrical power outages are usually the primary cause of the food losses sustained by SNAP recipients. In cooperation with the electrical utility companies, power outage time frames will be assessed by disaster area and/or individual households if necessary. In most instances, replacement of food is not warranted if the electrical outage is less than 24 hours.

Level I Disaster response will utilize regular SNAP rules and will not require a Disaster declaration. This level of disaster may result in increased applications for SNAP benefits using regular program rules.

### **Level II Disaster**

When the disaster is defined as Level II, OKDHS will implement a response with modified SNAP rules. In these disasters, the extent of damage may be major but is confined to specific geographic boundaries. The FNS SNAP Disaster Guidance of April 2013 contains descriptions of waivers that have been requested by states that have experienced various disaster damages. Waiver requests are approved by FNS when the disaster has burdened state agencies to the extent they are not able to meet mandated program activities. The AFS SNAP will be responsible for obtaining waivers or other special approvals from FNS when implementing a Level II disaster response. The AFS SNAP Section will be responsible for providing designated county field staff with the modified rules. The county directors will be responsible for advising AFS of special needs such as office equipment (including telephones, computers, and furniture), staffing, or physical facilities.

The Level II disaster efforts will primarily be focused on service to SNAP recipients in replacing food damaged or destroyed in individual household misfortunes. Replacement procedures are outlined in the Federal Disaster SNAP Handbook and in our state SNAP policy section, "340:50-11-64 – Destroyed food purchased with benefits". Local county office facilities will, in most instances, be capable of meeting the needs of recipients in this type of disaster response. Discretion of local county directors will prevail when requests for disaster assistance are made with each request considered individually.

The Level II disaster response may result in increased applications for SNAP benefits using modified program rules.

### **Level III Disaster**

The Level III disaster response is implemented when disaster damage is widespread and catastrophic: households from all economic levels are affected;

large numbers of residences and businesses are damaged or destroyed; normal food distribution channels have been disrupted but are restored. A formal disaster application is submitted to FNS and approved. Regular SNAP rules are replaced by DSNAP rules, procedures, and processes. Eligibility criteria are relaxed in order to serve applicants who may not otherwise be eligible for the regular program. Verification rules are relaxed because county staff or the applicant household may not have access to usual verification sources.

The County Directors in counties within the designated disaster area, in coordination with Regional and State Office management will be responsible for assessing specific needs such as office equipment, staff, and disaster site location. The initial DSNAP application period is approved by FNS for a period not to exceed 7 days. Depending on the severity of the disaster, the county directors in the affected counties, with coordination from the State Office AFS, are empowered to make decisions as to whether the county office will be open seven days a week. The Regional Directors, in coordination with the State Office AFS and their respective county directors, are empowered to make staffing decisions during the DSNAP, temporarily moving staff from one county to another if needed.

Local county offices may be the most logical and accessible choice for disaster sites as it allows client's to apply statewide and local county offices are equipped with staff and the essentials needed to run a D-SNAP program. If OKDHS is granted a waiver by FNS to allow mass electronic food replacements to on-going SNAP recipients (this type waiver was requested and approved by FNS during the May 2013 tornado disaster), this will provide great relief to the county staffs involved.

The Level III response will result in substantial numbers of applications for Disaster benefits. OKDHS may also experience large increases in the number of applications for benefits using the regular SNAP rules. AFS will work closely with the OKDHS Office of Communications in dispersing information regarding the disaster. This is explained more fully in the section titled, "Communications".

### **Planning for the Tier III Disaster Response**

The OKDHS Data Services Division (DSD) has developed a comprehensive Disaster Recovery Plan (DRP). In the event a disaster occurs, the DRP is initiated to recover and/or restore data processing services. The purpose of the DRP is not only to react to an interruption of services but also to identify possible risks and develop structures to minimize the impact of services outages to the Department. The objectives of the DRP are to avoid disasters by reducing the exposures that could result in an outage and minimizing the outage once it occurs.

The OKDHS DSD Data Center is located at 1110 NE 12<sup>th</sup> Street in Oklahoma City, OK. The Data Center is on the campus of the University of Oklahoma

Health Sciences Center with physical monitoring performed by University of Oklahoma Security Police. The stand-alone Data Center is contained on the first floor of a three-story building with DSD staff occupying the other two floors and is operated on a 24-hour schedule. Access is electronically controlled and video monitored at all times both externally and internally. Computer rooms are protected by an FM200 fire suppression system and dry pipe sprinkler system. The center is supported by two (2) Uninterrupted Power Supply (UPS) systems consisting of 60-cycle battery backup with two (2) 500 KW generators and alarms. Additionally there is a backup Chilled Water System consisting of 100 Tons with alarm and a 500 KW generator. All support components of the computer operation are monitored and evaluated on a monthly basis.

The core Payments and Services 2 (PS2) application is a host-based case information and data management system. PS2 is a major client services system that contains general client demographics, and financial information to support eligibility for the Supplemental Nutrition Assistance Program, Medicaid eligibility, Temporary Assistance to Needy Families, Child Care, Energy Assistance and state services for the Aged, Blind and Disabled. It has a major client server-based front-end component called Family Assistance and Client Services (FACS). Information about the case certification, eligibility, services, authorizations and data exchange are written in COBOL.

The PS2/FACS System is a 2-tiered client server application consisting of a front-end PowerBuilder 10.5 GUI component with native drivers connected to DB2 databases, and the backend composed of IMS transactions using IMS DB and DB2 databases. There are around 150 IMS databases and 24 DB2 database schemas used by PS2, FACS and the web services applications. The FACS client resides on the users' local machine, and the FACS runtime module resides on the county file servers.

The Automated Caseload Evaluation System (ACES) application is a GUI tool designed to access IMS information about 1) individual cases, and 2) specific cases on a caseload. ACES performs the required functions of a federally defined Income and Eligibility Verification System (IEVS).

A recovery of the PS2/FACS and ACES applications involves the recovery of the underlying z/OS and z/VM operating system, the DB2 and IMS databases that house the data for this application, and a number of operating system subcomponents, as well as several Intel file servers.

Operating system, databases, and PS2 application backups are performed using IBM's Hierarchical Storage Manager (HSM), the backup/recovery component of the z/OS operating system. Backup tapes are created during the normal process of backing up the system. Files marked for disaster recovery test purposes are duplicated in a secondary pool and a second logical volume is created. This logical volume is stored on a physical volume and can be 'exported', which will cause the physical tapes to be ejected from the Virtual Tape System (VTS) for transport to the recovery site.

OKDHS is contracted for business continuity and recovery support with IBM Business Continuity and Recovery Services (IBM/BCRS). Actual recovery and some recovery exercises are executed at a Colorado facility. The test of the warm site data center in Boulder, CO, is conducted on an annual basis each November. The 2013 test is scheduled for Nov. 18-21.

<b>IBM/BCRS exercises</b>
March 2010 – For the first time a fully exercised remote site (Colorado) recovery of the PS2/FACS systems for SNAP, Child Care, TANF, Medicaid and other state eligibility programs including inter-agency and EBT interfaces.
March 2011 – On-site (Oklahoma) Business continuity of Oklahoma technical architecture, non- software specific
September 2011 – On-site (Oklahoma) Full recovery of state SACWIS system
April 2012 – On-site (Oklahoma) Business continuity of Oklahoma technical architecture, non- software specific
March 2013 – Planned/Fully exercised off – site (Colorado) recovery of state SACWIS system (Child Welfare) along with other applications (Adult and Family Services is in discussions on what eligibility applications could be included in this mix)

In the list above is information about the SACWIS system. During some of these exercises portions of the state IV-D (Child Support) system were also recovered. At OKDHS the eligibility, child welfare and child support systems are enterprise as far as the data center and technical platforms. Therefore even when an exercise focuses on an area other than eligibility software the infrastructure that the eligibility software requires is still being exercised. AFS business analysis and technical staff participate fully with these exercises in order to hone skills and improve execution plans for the eligibility systems.

On both the business and information technology sides of OKDHS there are full-time CBCP certified staff that coordinate with AFS on recovery operations. In between the exercises there are ongoing process improvement analysis and efforts. Additionally AFS works with the OKDHS Finance operations staff and the state EBT vendors to conduct the mandated EBT recovery operations. The State conducts an annual test of the ACS EBT system backup facility, beginning with the September 19-20, 2013, test. This test takes an estimated five minutes to switch to the backup system.

The exercises above in March 2011 and April 2012 were scaled back to on-site versus remote site software specific exercise because of cuts to the OKDHS information technology budget and a full remote site exercise scheduled for November 2012 has been cancelled due to the work involved with a transfer of the OKDHS data center and technology staff to a different state agency due to a state IT consolidation law that was passed. AFS has been working with the new consolidated infrastructure to jointly focus on the March 2013 exercise. A current

assessment indicates that the consolidation will improve the budget and resources available for recovery operations and exercises.

The OKDHS (EPS and Data Services) and Xerox State and Local Solutions conduct annual tests of the contractor's disaster preparations. The most recent test was conducted at 1 a.m. October 21, 2011. The test involved Xerox taking down the primary location in Dallas, Texas and routing all capabilities to the secondary site in Pittsburg, Pennsylvania. Down time was approximately 48 seconds during the switch. After the move normal operations of transaction processing, file movement between the state and contractor and contractor and state were conducted as well as IVR and CSR capabilities. OKDHS staff also confirmed AT access and capabilities. After each step was confirmed the process was repeated in moving the operations from Pittsburg back to Dallas. Down time for the switch was approximately 47 seconds. Testing of all components was repeated before sign off and the test was considered successful at approximately 2:05 am. Note in advance of the test the retail community was advised of the date and time and potential issues.

There were multiple objectives for this DR exercise.

1) The primary objective of this test was to perform an offsite recovery of the PS2 application to demonstrate OKDHS Data Services Division's (DSD) ability to recover effectively from an unforeseen long-term outage or disaster. The recovered PS2 application would be tested to determine that:

- data could be verified and viewed to confirm existing information;
- new eligibility could be created for a) financial benefits, b) food benefits, c) child care authorizations, and d) medical eligibility information.
- benefits on the new eligibility could be issued.

2) Another objective was the recovery of the FACS application such that data could be verified and viewed similar to activities for PS2 transactions.

3) Another objective was the recovery of the ACES Web Application in a closed network.

A secondary objective was to establish some transactions/files that could be transmitted between the platforms (e.g. FTPs from mainframe to AS/400, such as Diversion Assistance).

Another secondary objective was to perform the recovery of the Report Distribution System (RDS)

The DSD technical staff and the PS2 Subject Management Expert team developed a set of procedures that would provide for the recovery of the PS2 application's required files and databases, as well as recover a database web server at an offsite recovery

location. A dedicated DR LPAR was established at the DSD central site for the development, debugging and evaluation of the procedures.

A series of onsite exercises were planned to be performed in preparation for the remote exercise. The initial walk-thru exercise was completed Jan. 12, 2010. After the walk-thru was completed, a number of improvements were made to the existing procedures and incorporated into a single integrated onsite test spanning several weeks.

Two sets of recovery cartridges, one from each VTS, were prepared in advance for the exercise using the “as-of” date of March 12-14. One set was encrypted; the other was not, in case the encryption process was defective or otherwise unusable. The cartridges from the remote unit were encrypted and selected as the primary data source for the exercise. Each set of tapes was shipped separately via controlled courier, along with communications equipment and supplies to the BCRS facility in Boulder Co. in advance of the recovery test.

The DR test was successfully completed. Aside from the ACES application, all PS2 and Finance primary objectives were accomplished. The ACES application was recovered, but communication to it could not be made. The RDS application was recovered. The secondary objectives for file transfers were not met.

This DR test marked a milestone for the DR team, because in addition to recovering the Finance AS/400 system the DR team has now recovered to date the Child Welfare, Child Support and Family Support systems, which comprise 85% of the DSD transactions.

Timeline:

3/23/11 0745 - Exercise kickoff with IBM technical staff – network, mainframe, Intel, AS/400.

3/24/11 1629 - SYSPRD1 & SYSPRD2 up; database analysts performing recoveries of base IMS and DB2, then loading of files and tables for each.

3/25/11 0838 – Line of Business testing begins.

3/25/11 1509 – Line of Business testing successfully completed, benefits issued.

### **Disaster SNAP Pandemic Flu Planning**

A human pandemic is likely to receive a Presidential disaster declaration which provides the authority needed to approve State request for DSNAP. The DSNAP is likely to be the primary nutrition assistance response during a human pandemic. OKDHS will not be able to certify applicants at mass application/issuance sites or at local offices due to restrictions on social gathering and will need to accommodate a greatly increased workload. During peak periods of a pandemic flu, up to 40 percent of the workforce is expected to be

absent and may need food assistance. Adding to the complexity of benefit delivery, the key public health intervention to slow the spread of the disease will be social distancing, which will prevent State agencies from using many standard procedures, like face-to-face interviews. FNS has new flexibilities that OKDHS can request from FNS as apart of a DSNAP to aid persons affected by a pandemic flu. The new flexibilities include waiving the face-to-face interview altogether and filing DSNAP applications by telephone, internet or mail. These flexibilities are being made exclusively for response to the pandemic flu and are not available for use after other kinds of disasters. Current flexibilities with regular SNAP are Substituting telephone interviews for face-to-face interviews. OKDHS would use the standard one-month DSNAP certification period and extend as needed if pandemic conditions and/or social distancing continue. OKDHS can utilize pre-pinned EBT cards on new applicants. Current SNAP participant's benefits could be mass issued electronically to their EBT card without face-to-face contact.

OKDHS officials will also reference the 2007 Oklahoma Pandemic Influenza Management Plan from the Oklahoma Department of Health to ensure the agency is following proper health guidelines. The full 252-page state plan can be accessed with this link:

<http://www.ok.gov/health/documents/2007%20OK%20State%20Pandemic%20Plan%20.pdf>.

All pertinent documents related to EBT Pandemic Influenza plan are on file with the Director of Electronic Payment Systems.

1. XEROX Business Continuity Plan (BCP) for Data Centers – Pandemic Plan
2. XEROX Call Center BCP – Pandemic Plan
3. XEROX Oklahoma City Project Office BCP – Pandemic Plan

### **Contingency Planning for Disaster SNAP**

A group comprised of representatives from various OKDHS divisions and other state and federal agencies will meet at the onset and conclusion of a federally declared disaster to assess quality of service to applicant households. The OKDHS divisions included in this group are AFS, Data Services Division, Office of Finance, and Office of Support Services. Regional Office management staff of the designated disaster area will also be involved in the planning and administering of the DSNAP. AFS/SNAP Section designated staff are in continual contact with FEMA and the Oklahoma state desk manager from the Southwest Region Food and Nutrition Services (FNS) office in Dallas, giving updated information on the status of the disaster as well as requesting additional information, clarification, and coordination of disaster related activities.

When a potential disaster event is identified, several things happen at once. The OKDHS Office of Risk Management works immediately with the Office of Emergency Management (OEM) in identifying the degree of the disaster. The state office AFS staff begins to work with the county offices affected by the event.

Primary concern is given to the county office facilities, employee safety, and vulnerability of the clients. Personal contact is made with all vulnerable households such as foster homes, medically fragile, elderly, and disabled individuals. AFS SNAP Section and state office staffs meet to begin discussion and planning for the advent of a federally declared SNAP disaster. Once a formal request to activate the DSNAP is made and approved by FNS, the Contingency Group will begin immediate planning and implementation of the DSNAP. The nature and scope of the disaster dictates where the DSNAP sites will be located. It is left to the Regional and county management discretion in coordination with the AFS state office in deciding the best location for a DSNAP site. Sites will provide water and possibly snacks to applicants while ensuring they are as comfortable as possible. When indoor facilities are not available, portable toilets and tents for protection will be provided. Special consideration will be given to assist the elderly and disabled to include ease of accessibility to the application site, special parking and assistance with application procedures.

As a result of this group's post-DSNAP analysis, past improvements have been made in the state plan of operations including:

- May 3, 1999 tornado: Laptops were purchased for use in federally declared disasters. In the event of a DSNAP, the laptops are made available through the Area offices to the counties affected by the disaster. The laptops have on-line communications link to the state's system even when used in temporary off-site locations.
- January 2001 ice storm: Six complete sets of EBT equipment were purchased, one for each of the six area offices, for use in federally declared disasters. This equipment was replaced with new flat card printers. The State now has 10 flat card printers set aside for disasters. Five are located at the contractor's office in OKC and five are located in the EBS Office in Oklahoma City. The equipment is divided between two locations so that if either were impacted by a disaster the other would have printers to deploy.
- January 2002: The AFS SNAP Section is responsible for requesting mass quantities of the DSNAP application packet materials be printed in colored paper format and made available to the designated disaster counties. The DSNAP forms and related materials are delivered to the affected counties at the time training is conducted prior to the onset of the DSNAP.

### **Electronic Benefit Transfer (EBT) System**

The EPS Incident Management Team (IMT) is responsible for the following activities for recovery of EBT services to the OKDHS field offices:

- Keep a log of all activities and observations related to the incident. The log must include:
  - Date and time of major activities and events.
  - Date, time, and content of major decisions.
  - Any other information relevant to the recovery of EBT

services.

- Conduct an assessment of the office's operability.
- Is the office inhabitable?
- Does the office have telecommunications?
- Does the office have power?
- Has the EBT equipment been damaged?
- Use the EBT equipment list to check off equipment that is usable, repairable, or destroyed.
- With the help of the Data Services Division, determine whether network connectivity has been interrupted.
- Quickly obtain and ensure replacement equipment is installed.

### **Contractor Responsibilities**

The Contractor for EBT is responsible for certain activities related to the OKDHS Disaster Preparation Plan. OKDHS currently contracts with Xerox State and Local Solutions formerly Affiliated Computer Services (ACS) to deliver EBT benefits. Xerox is also contractually required to participate in yearly disaster tests in conjunction with OKDHS, must be able to support the OKDHS systems in the event of an extended outage and perform the following functions:

- Load disaster benefits to disaster cards in the event an OKDHS mainframe or communications outage.
- Print disaster cards.
- Pre-pin disaster cards.
- Store and account for all disaster cards until needed.
- Distribute disaster cards to federally declared disaster counties as needed. The number delivered to each county is determined by the Director of Electronic Payment Systems.
- Provide and set-up back-up flat card printers to counties participating in federally declared disasters.
- Add temporary messages to the EBT IVR as provided within 2 hours of request.
- Insure adequate staffing at customer call center to assist in delivering disaster information.
- Provide office space to Electronic Payment Systems office staff as needed.
- Provide settlement activities related to disaster benefits.
- Settle with retailers and TPP's.

In the normal course of business, the Contractor is to ensure retailers are supplied with and trained in the use of manual vouchers. The Contractor shall provide retailers with the quick reference guide for executing manual vouchers.

Each year by March 1, the Contractor will be required to contact all FNS certified retailers to confirm that an adequate stock of manual vouchers is on hand and to provide manual voucher refresher training.

The Contractor is expected to support State disaster relief operations for all aspects surrounding disaster operations including customer service.

**Non-Disaster Recovery Scenarios:**

There are a number of scenarios that would not be declared a disaster, or require the implementation of a fully deployed relocation of office functions. Assistance to the county office is dependent on the recovery procedures established by the County Director. Of the possible situations that could occur, the IMT will respond to the following situations described in the sections below.

**Scenario 1/Systems Down:** In this scenario, the building is viable and accessible and power is available, but one or more operational components (including network components) are down. It is doubtful that the county office would relocate in this situation. If the outage was expected to last less than 24 hours services would be provided by an adjoining county office and the EPS Project Office would not become involved. If the outage was expected to exceed 24 hours, the EPS Project Office IMT would coordinate with the Contractor and the OKDHS Data Services Center to access the system outside the OKDHS firewall to allow for the entry of client demographic and benefit data directly into the system.

- Coordinate the removal of firewall restrictions on the admin terminal.
- Reconfigure the flat card printer to accept a direct connection to the admin terminal (cards could not be printed remotely).
- Provide staff to enter demographic and benefit data directly into the system.
- Status and print cards.
- Coordinate the return of data from Contractor to the Data Services via the Activity File which is produced daily.
- Coordinate with Contractor to communicate with the Call Center for special handling instructions.

**Scenario 2/No Power:** In this scenario, the building is viable and accessible, but power is not available. In the event that City power or building power is out, the county office may or may not relocate to an alternate site until power is restored. If the office did not relocate then services would be provided by an adjoining county office and the EPS Project Office would not become involved. If the office relocates the EPS Project Office IMT would coordinate with

Family Support Services, Field Operations, Facilities Management, Data Services and the County Director to accomplish the following:

- Relocate the flat card printer or provide a temporary printer
- Relocate the admin terminal or the county office would utilize a portable notebook.
- Relocate the Verifone 510 pin terminal or provide a temporary pin terminal.
- Request installation of an emergency phone line for toll-free access to the XEROX IVR.
- Coordinate the installation of two network drops for printer and admin terminal. If the county has wireless capabilities only one network connection would be required for the printer.
- Coordinate with XEROX to communicate with the XEROX Call Center for special handling instructions.

**Scenario3/Building Not Viable/Accessible:** In this scenario, the building is not viable and/or accessible, but power is available and all operational components are functioning. (An example of this scenario would be toxic fumes.) In this case, relocation would depend on how long the building was likely to be inaccessible. If the office did not relocate then services would be provided by an adjoining county office and the EPS Project Office would not become involved. If the office relocates the EPS Project Office IMT would coordinate with Family Support Services, Field Operations, Facilities Management, Data Services and the County Director to accomplish the following:

- Relocate the flat card printer or provide a temporary printer
- Relocate the admin terminal or the county office would utilize a portable notebook.
- Relocate the Verifone 510 pin terminal or provide a temporary pin terminal.
- Request installation of an emergency phone line for toll-free access to the XEROX IVR.
- Coordinate the installation of two network drops for printer and admin terminal. If the county has wireless capabilities only one network connection would be required for the printer.
- Coordinate with XEROX to communicate with the XEROX Call Center for special handling instructions.

**Scenario 4/Building Not Viable/Accessible, No Power:** In this scenario, the building is not viable and/or accessible, and power is not available. Relocation would depend on how long the building was likely to be inaccessible. If the office did not relocate then

services would be provided by an adjoining county office and the EPS Project Office would not become involved.

If power, network connections and telecommunications was available at an alternate site and the office relocates the EPS Project Office IMT would coordinate with Family Support Services, Field Operations, Facilities Management, Data Services and the County Director to accomplish the following:

- Relocate the flat card printer or provide a temporary printer
- Relocate the admin terminal or the county office would utilize a portable notebook.
- Relocate the Verifone 510 pin terminal or provide a temporary pin terminal.
- Request installation of an emergency phone line for toll-free access to the Contractor IVR.
- Coordinate the installation of two network drops for printer and admin terminal. If the county has wireless capabilities only one network connection would be required for the printer.
- Coordinate with Contractor to communicate with the Call Center for special handling instructions.

If power, network or telecommunications connections were not available and staff had to relocate to alternate site the EPS IMT would coordinate the following tasks:

- Coordinate the removal of firewall restrictions on the portable wireless notebook tablets.
- Request generator for flat card printer.
- Reconfigure the flat card printer to accept a direct connection to the notebook tablet (cards could not be printed remotely).
- Provide staff to enter demographic and benefit data directly into the system.
- Status and issue cards.
- Coordinate the return of data from the Contractor to the Data Services via the Activity File which is produced daily.
- Coordinate with the Contractor to communicate with the Call Center for special handling instructions.

If power were available but network or telecommunications connections were not available and staff had to relocate to alternate site the EPS IMT would coordinate the following tasks:

- Coordinate the removal of firewall restrictions on the portable wireless notebook tablets.
- Relocate the flat card printer or provide temporary printer.

- Reconfigure the flat card printer to accept a direct connection to the notebook tablet (cards could not be printed remotely).
- Provide staff to enter demographic and benefit data directly into the system.
- Status and issue cards.
- Coordinate the return of data from the Contractor to the Data Services via the Activity File which is produced daily.
- Coordinate with Contractor to communicate with the Call Center for special handling instructions.

If power and network communications were available but telecommunications connections were not available and staff had to relocate to alternate site the EPS IMT would coordinate the following tasks:

- Relocate the flat card printer or provide a temporary printer
- Relocate the admin terminal or the county office would utilize a portable notebook.
- Relocate the Verifone 510 pin terminal or provide a temporary pin terminal.
- Request installation of an emergency phone line for toll-free access to the Contractor IVR.
- Coordinate the installation of two network drops for printer and admin terminal. If the county has wireless capabilities only one network connection would be required for the printer.
- Coordinate with the Contractor to communicate with the Call Center for special handling instructions.

**Scenario 5/No telecommunication:** In this scenario, the building may or may not be viable and/or accessible, and the telephone lines are non-operational. Actions would depend on determining the duration of the outage. It is doubtful that the county office would relocate. If the office did not relocate then clients would utilize the XEROX IVR for pinning cards from their home or another functioning facility. If the office relocates the EPS Project Office IMT would coordinate with Family Support Services, Field Operations, Facilities Management, Data Services and the County Director to accomplish the following:

- Relocate the flat card printer or provide a temporary printer
- Relocate the admin terminal or the county office would utilize a portable notebook.

- Relocate the Verifone 510 pin terminal or provide a temporary pin terminal.
- Request installation of an emergency phone line for toll-free access to the Contractor IVR.
- Coordinate the installation of two network drops for printer and admin terminal. If the county has wireless capabilities only one network connection would be required for the printer.
- Coordinate with Contractor to communicate with the Call Center for special handling instructions.

### **Electronic Benefits Transfer (EBT) Functions by Level of Disaster:**

The OKDHS has made advance preparation for a Level 2 or Level 3 disaster. This section will address the processes and procedures established to help the citizens, retailers, county offices and staff to recover from a disaster. As with all other aspects of disaster response services, the EBT support objective is to function as needed for the particular situation at hand while being able to shift quickly to meet changing demands. To illustrate the scope of possible services, a list of EBT functions commonly used by level of disaster is shown below, along with applicable waivers. It is important to remember, however, that these services should be interchangeable across all levels.

#### **Level 1 Disaster:**

Category 1 or 2 storm or equivalent

- Minimal numbers of residents and commercial establishments negatively impacted (25% or less)
- Limited power and telecommunications infrastructure impact; "spot outages" with restoration in 1 - 3 days
- Benefit redemption points available (over 80%)

#### **Service Options**

- Coordinate EBT activities to restore county office.
- Survey and monitor retailers after the disaster.
- Survey and monitor financial institutions after the disaster.
- Replace any damaged or lost EBT-only point-of-sale (POS) terminals.
- Process mass replacement of and/or supplements to benefits, if needed and approved.
- Provide customer service assistance to callers in the affected areas (e.g., informing callers of operational benefit redemption points and issuing replacement cards to alternate addresses for affected recipients).
- Add special services messages to the interactive voice response (IVR) system, if needed.
- Provide manual voucher processing with an extended authorization period, if needed.

## **Level 2 Disaster:**

### **Category 2, 3 or 4 storm or equivalent**

- Moderate to large number of residents and commercial establishments negatively impacted (25% - 50%)
- Power and telecommunications infrastructure outages, with restoration in 4 - 7 days
- Benefit redemption points available (over 65%)

### **Services Options**

- Coordinate EBT activities to restore county office.
- Survey and monitor retailers after the disaster.
- Communicate policy/procedural changes for benefit redemption points.
- Replace any damaged or lost EBT-only POS terminals.
- Replace any damaged or lost flat card printers.
- Provide manual voucher processing with an extended authorization period, if needed.
- Survey and monitor financial institutions after the disaster.
- Process mass replacement of benefits if approved.
- Implement a policy waiver, if needed, to permit purchase of hot prepared food items with SNAP benefits.
- Implement a policy waiver, if needed, to allow early release of SNAP benefits.
- Implement a policy waiver, if needed, to extend certification periods.
- Implement a policy waiver, if needed, to implement a Disaster SNAP, if approved.
- Implement a policy waiver, if needed, to shorten the expungement time frame to 90 days for disaster benefits.
- Implement a policy waiver, if needed, to permit key entry of the card number at the point of sale without the physical card present.
- Provide customer service assistance to callers in the affected areas (e.g., informing callers of operational benefit redemption points).
- Deliver preloaded/prepinned disaster cards.
- Modify security requirements for customer identification.
- Add special services messages to the IVR.
- Drop ship EBT disaster cards to designated sites.
- Process supplemental benefits as approved.
- Implement specialized disaster daily reporting.

## **Level 3 Disaster:**

### **Catastrophic category 4 or 5 storm or equivalent**

- Widespread damage with large numbers of residents and commercial establishments

negatively impacted (over 50%)

- Power and telecommunications infrastructure outages, with restoration in more than 7 days
- Benefit redemption points available (less than 65%)

### **Services Options**

- Coordinate EBT activities to restore county office.
- Survey and monitor retailers after the disaster.
- Provide manual voucher processing with an extended authorization period, if needed.
- Provide emergency manual vouchers, if needed.
- Communicate policy/procedural changes for benefit redemption points.
- Replace any damaged or lost EBT-only POS terminals.
- Replace any damaged or lost flat card printers.
- Survey and monitor financial institutions after the disaster.
- Process mass replacement of benefits if approved.
- Implement a policy waiver, if needed, to permit purchase of hot prepared food items with SNAP benefits.
- Implement a policy waiver, if needed, to allow early release of SNAP benefits.
- Implement a policy waiver, if needed, to extend certification periods.
- Implement a policy waiver, if needed, to implement a Disaster SNAP, if approved.
- Implement a policy waiver, if needed, to shorten the expungement time frame to 90 days for disaster benefits.
- Implement a policy waiver, if needed, to permit key entry of the card number at the point of sale without the physical card present.
- Provide customer service assistance to callers in the affected areas (e.g., informing callers of operational benefit redemption points).
- Add special services messages to the upfront IVR.
- Provide automated mass account reactivations.
- Deliver preloaded/prepinned disaster cards.
- Modify security requirements for customer identification.
- Drop ship EBT disaster cards to designated sites.
- Mail disaster card issuance in multiple daily card files.
- Provide enhanced customer service (e.g., additional customer service representatives (CSRs), separate toll-free number, special messages for any wait time, routing of certain call issues to CSRs for assistance).
- Process supplemental benefits as approved.
- Implement specialized disaster daily reporting.

### **Issuing Preloaded/Prepinned Disaster Cards:**

The State of Oklahoma has made the option available which is to be determined at each Level 2 or Level 3 disaster, to issue pre-loaded/pre-pinned disaster EBT cards. Advanced preparations for these cards have already been made for a Level 2 or Level 3 disaster, as we realize that disasters at these levels can impact thousands of citizens, multiple county offices and hundreds of retailers. This section will address the processes and procedures for issuing preloaded/prepinned disaster cards.

### **Disaster Case Number Range**

OKDHS has dedicated 200,000 case numbers to its disaster SNAP with a specific case identifier of "J" which will precede all disaster SNAP case numbers. The range dedicated is J799999 through J999999.

### **Processing Rules for Disaster SNAP Cards**

Disaster case will consist of the following information:

#### **Demographics:**

- 10,000 initial disaster cases will be established within system
- Each disaster case will be assigned a "J" case number by the State.
- Required fields for normal external file processing will apply.
- Once disaster accounts are utilized the State will transmit external file demographic updates to the account updating the account on system from a generic account holder to the issued account holder during the time of the disaster.

#### **Benefits:**

- Each of the 10,000 disaster cases will maintain a .01 cent balance
- Each benefit will be tied to the DFSNP benefit type.
- All disaster benefits will be tied to the State's liability on EPPIC.
- Disaster benefits will follow the State's aging and expungement processing rules unless a waiver has been approved to allow for shorten expungement timeframes.
- When a disaster has been declared, the remaining 149.99 balance of the disaster benefit will be loaded to "X" number of cards using the following criteria to determine load method:
- If OKDHS Data Services are available, then OKDHS will transmit "X" number of 149.99 benefits to complete the 150.00 benefit allowance on the pre-loaded disaster cards.
- If OKDHS Data Services is un-available, the State will notify XEROX to load "X" number of accounts with a 149.99 deposit utilizing the same document number contained on the original .01 cent deposit, but adding a D to the original document number to identify that a benefit has been issued against the disaster account.

### **Card Specifications**

The card stock used for the Oklahoma Disaster Cards is the same card stock that is used for the regular Oklahoma EBT card. The

disaster cards are embossed and encoded at the time of request using the same standards and process that is utilized for the regular Oklahoma EBT card. Cards are prepinned. The disaster cards physically look the same with the following differences:

- The disaster card is embossed with “DISASTER CARD” in place of the client name.
- The case number is embossed on the card as it is generated.
- Additional Disaster cards will be dropped shipped within 24 hours of their request.
- Disaster cards will be identified by the 7th digit of the PAN with a “9” identifier of disaster.
- All disaster cards will contain a pre-set PIN of “1111”.
- A PAN will not be pre-assigned to any “J” cases during account set-up
- A card mailer will be provided with each card informing the client that the card has been pre-pinned and is ready to use (the PIN will not appear on the card mailer but rather the worker will inform the client of the PIN number for security purposes) further the mailer will instruct the client that it is recommended that they call the number on the card to change their pin if phone communications are available.

#### **Card Storage and Controls:**

The card stock used for the Oklahoma Disaster Card is currently being stored at the Contractor Card Production Facility in Jefferson City, MO. This card stock is governed by the stringent controls in place at the Facility. Once the disaster cards are created, they are sent to the Oklahoma City Contractor’s office for storage. Contractor assumes the control and financial liability of the prepared Disaster Card stock until a disaster event occurs and Disaster Cards are requested and received by the State. At the point the State takes possession of the Disaster Cards, the State assumes control and financial liability of the prepared Disaster Card stock. The respective county director will then become the security officer for card receipt and issuance. The cards will be inventoried at the time of receipt and kept locked in the county director’s office. As cards are needed they will be noted on the inventory and signed for by the EBT specialists and initialed by the county director or designee. The cards will be under the control of the EBT specialist at all times. At the end of each day, the unused cards will be returned to the inventory, signed in by the EBT specialist and initialed by the county director or designee.

#### **Ongoing Cases:**

Ongoing cases are considered cases that have an existing EBT account on the system. When a Disaster type B is declared by the State, there is no additional case set-up or card request requirements to prepare the existing recipient for receiving disaster

benefits. In the event an existing EBT client has lost their EBT Card as a result of the disaster event, the normal card replacement procedures are followed. The process of disaster benefit authorizations for existing OKDHS clients on the system follows the current process of regular benefit authorization. The State performs a “supplemental” benefit issuance to all clients in the affected counties/areas (by individual case or mass allocation), sending the benefit adds via the on-line real-time interface between OKDHS and the EBT system.

**New Applicants:**

At the time the disaster cards are distributed to the clients at the County Office, State staff and the applicant complete the application data, noting the disaster card and case number assigned to the applicant. This information is added to the OKDHS PS-2 system which in turn transmits the information via on-line real-time communication protocols to EBT system. This process sync’s up the newly assigned case number with its corresponding disaster card and updates the system with the individual’s demographic information.

**Communication**

AFS will work closely with the OKDHS Public Relations staff in dispersing a faxed media release to approximately 30 high profile media outlets. A mailed media release will be sent the same day to 155 media outlets across the state of Oklahoma. These news releases will also be posted to the OKDHS Website at <http://www.OKDHS.org/ipublicinfo/news.htm>. Oklahoma News Network (ONN, composed of 52 radio stations), and the Associated Press (AP) are then aware of the DSNAP. The press release shall include: When the DSNAP is scheduled to begin; DSNAP eligibility and verification requirements; statement encouraging DSNAP applicants to bring all available verification; civil and criminal penalties for fraud; proper use of SNAP benefits; non-discrimination statement; location and operating hours of application/issuance sites; special provisions (approved waivers, etc.); instructions for on-going participants and applicants with special needs; and fraud control measures.

The Office of Finance Electronic Benefit Transfer section will work closely with the Director of the Grocers Association in notifying grocers of the impending DSNAP. Most independent grocers are members of this association.

The AFS SNAP Section is responsible for communication to the state field staff regarding the implementation and administering of the DSNAP. The most up to date program information will be provided to field staff via email. Communication with FNS Southwest Region office is maintained continuously during the DSNAP.

County staff will be notified within one working day of clarifications and modifications to the DSNAP.

### **Outreach**

OKDHS will be using the SNAP outreach toolkit for community organizations supplement at [www.fns.usda.gov/fsp/tool-kits.htm](http://www.fns.usda.gov/fsp/tool-kits.htm) and FRAC's Advocate guide to the Disaster SNAP at [www.frac.org/pdf/dfspguide06.pdf](http://www.frac.org/pdf/dfspguide06.pdf).

### **Training**

Training is provided by the AFS SNAP Section for all area and county office program staff involved in the delivery of DSNAP assistance to households affected by the disaster. The AFS SNAP Section will provide training on-site or by conference call for all staff involved in the delivery of assistance to citizens of Oklahoma affected by the disaster. As stated previously, the AFS SNAP Section is responsible for providing immediate ongoing updates on policy and procedure to the field staff using email. The State Disaster Plan will be sent to all county offices. It will be used in conjunction with other training materials in providing affected county office staff with the most complete information possible for administering the DSNAP.

A specific training packet has been developed for distribution to designated Area/County field staff when a DSNAP is implemented. The training packet includes copies of the OKDHS (FNS approved) English and Spanish version disaster applications, DSNAP calculation worksheet, Comparing the DSNAP and SNAP chart taken from the FNS Handbook 320, Appendix C-3-A – Maximum Income Limits and Benefit Allotments for FNS Declared Disasters, DSNAP Commonly Used Terms and Definitions (developed by AFS SNAP Section), DSNAP step by step application processing guide (developed by AFS SNAP Section), USDA Tips for SNAP Shoppers sheet, USDA DSNAP Safe Food sheet, Fraud and duplicate participation poster information, and the DSNAP Issuance Report form.

As stated previously, the AFS SNAP facilitates the copying of the DSNAP training packet in large quantities for distribution to the designated Area and County sites. This reduces the burden on individual county offices to copy the training packet and application materials for field staff and streamlines the DSNAP implementation by providing all needed application materials to the counties prior to the onset of the DSNAP. Colored paper is also used in the printing of the DSNAP application materials to more easily identify disaster related applications. The DSNAP application is available and printed in both English and Spanish.

OKDHS provides telephonic interpreter services through an agreement with Language Line Services. The agreement provides for statewide access to interpreter services, 24 hour a day, 7 days a week, 365 days a year. The service

is accessed via a toll free number. All calls go directly to a call center and are immediately transferred to the appropriate interpreter. The company provides interpreter services in approximately 150 languages. The majority of requests have been for Spanish interpreter services.

### **Application Processing and Disposition**

All persons wishing to apply for SNAP benefits at the time of a disaster will be given an opportunity to make application. OKDHS will also have non-Disaster SNAP applications available and distribute them if necessary, in addition to the DSNAP application. The non-Disaster SNAP applications will be distributed to individuals who live outside the disaster area but come into the disaster area. The applicant households must file the application during the time frame OKDHS has been authorized to accept DSNAP applications. The application for disaster SNAP benefits will consist of a face-to-face interview and completion of the FNS disaster SNAP application form. The worker must establish the applicant household resides in the designated disaster area during the interview. The household must pass the income and resource tests to meet eligibility. The household must have experienced one of the following adverse affects: lost food, sustained damage or destruction to the home and/or self-employed business, incurred disaster related expenses that will not be reimbursed, lost income or income becomes inaccessible as a result of the disaster, and inaccessible liquid resources.

The State can choose to use the Standard Disaster expense deduction with a \$100 minimum disaster expense threshold. This decision is made prior to each DSNAP application for a specific event. DSNAP instructions to county staffs are updated prior to each event and choosing to use this Standard Disaster expense deduction will be fully explained.

When an application is made for disaster SNAP benefits, the worker will first access the Information Management System (IMS) to determine if the applicant household is currently in the system and receiving regular SNAP benefits. The name and social security number (SSN) of the applicant, the address, the date of birth of the applicant will be entered. The application form will list all persons included in the household unit and their dates of birth. It is **not** mandatory that the SSN's of all household members be listed on the application form. Under the Disaster SNAP, eligible households always receive the maximum allotment for the household size.

If the household is already receiving SNAP benefits, a supplement action to replace food lost as a result of the disaster will be completed to provide the household with the maximum SNAP allotment provided through the DSNAP. Beginning FFY 2008, ongoing food benefit households will be required to sign an *Affidavit of Loss of income or Disaster-Related Expenses*, attesting to having experienced either loss of food or incurred disaster-related expenses as a result of the disaster event.

If the data information determines the household has already received disaster assistance at another disaster site, the application will be denied. IMS should be monitored for previously denied SNAP applications. OKDHS system is capable of supplementing eligible households for multiple and/or prior months when appropriate.

If the data information indicates the applicant is not known to the system, then the application process will continue.

OKDHS staff will advise applicants of the disposition of their applications immediately. The applicant and the social worker must sign the application.

In those rare instances where an immediate decision cannot be made due to questionable information provided by the household, the application can be held in pending status for a period of time not to exceed 7 days in order so that the household can either provide additional information and/or the worker can obtain needed information from a designated source to resolve the situation.

If an application is approved, the household will be advised of the amount of the allotment and the period the benefits are intended to cover. Clients who are certified to receive SNAP benefits will receive their EBT card the same day of application and approval for DSNAP or within three calendar days of the date of application for benefits. Clients approved for DSNAP will be sent to EBT specialists specifically dedicated to performing EBT card processing with the client households, separate and apart from the eligibility determination social workers.

If an application is denied, the social worker will explain the basis for denial. Households denied disaster SNAP benefits may request a fair hearing in accordance with normal procedures.

A specific computer code, "S-24R", is used to identify DSNAP actions when teleprocessing approval/denial actions. This ensures the disaster benefit issuance period is for no more than one month and specifically identifies the SNAP issuance as related to a federal disaster. The DSNAP actions are completed in the state's eligibility system without adversely impacting other program benefits such as TANF, etc. Computer generated certification and denial notices are sent to all households upon teleprocessing of the disaster SNAP benefit action in the system.

### **OKDHS Employee and DSNAP application**

All applications of OKDHS employees for the Disaster SNAP are approved by the county director or designee. FOD 11-004 memo issued 09/26/2011 updates protocol for notifying the county director of sensitive situations concerning case

assignment that may pose a security risk or the appearance of conflict of interest. County directors are expected to make appropriate case assignments to minimize security risks and the appearance of any conflict of interest once they are aware of sensitive situations. Effective 10/01/2011, to document and track sensitive case assignments, employees are required to complete and submit to the county director Form 09AD042E, Securing and Assigning Sensitive Case Records, when the employee, members of his or her household, relatives as defined per OAC 340:2-1-8(b)(1), or other persons identified as sensitive in nature due to their personal relationship with the employee:

- Apply for or receive benefits;
- Receive other payments approved by human services center staff such as TANF flexible funds, child care provider payments, or foster parent payments; or
- Receive APS or CW services.

The county director completes Part II of Form 09AD042E and keeps the original in a secure location separate from regular case files.

Imaging is now expanded state-wide to all human services centers. Paper records must be kept in a secure location until they are imaged. Imaged records do not need to be printed in order to secure paper records as doing so does not limit electronic access. Once the paper record is imaged, it may be destroyed.

### **Eligibility Criteria**

A household must meet all of the following criteria in order to qualify for the disaster SNAP assistance:

1. The household has been adversely affected by the disaster, and
2. The total of the household's currently available income and liquid resources, after deducting disaster related expenses, is less than or equal to the disaster income limit for its household size as shown in the Appendix C-3-A Maximum Income Limits and Benefit Allotments for FNS Declared Disasters, and
3. The household must be purchasing food and preparing meals together during the disaster benefit period, and
4. The household must be residing within the geographical area authorized for disaster relief at the time of the disaster.

### **Benefit Redemption**

The disaster SNAP benefits are posted to the system and are identified by the "S-24R" code designated for use only during a federal disaster period. The recipients will not be denied access to assistance through system help desks or other services provided to ongoing SNAP recipients.

The disaster assistance benefits are subject to the same aging rules that apply to normal SNAP benefits. Disaster benefits issued as supplements to ongoing SNAP households are not specifically identified as disaster benefits. However,

these benefits are identified by issuance during the disaster SNAP application period in the designated counties affected by the disaster.

### **Reporting**

Counties included in the DSNAP are required to submit daily statistical reports to the AFS SNAP and to their respective Area office via email or FAX. FNS requires that all states utilize the daily reporting template found in the DSNAP Toolkit for State Agencies. The Daily Reporting Sheet is sent to affected counties for use during the DSNAP application period. The daily reports submitted by the affected county offices include the number of new and ongoing households approved for the DSNAP, number of new and ongoing persons approved, total value of new and ongoing benefits approved, average benefit for new and ongoing households, and total number of households denied. "New" is defined as those households new to the system who have not previously received benefits. "Ongoing" is defined as those households currently in the system and receiving benefits. The SWR-FNS office requires states to submit a daily report of the dollar value of disaster-related replacement benefits issued and the associated participant count. In the event multiple disasters are being handled at the same time, the State will be and is able to collect and report disaster related benefit information by specific disaster.

Final DSNAP statistics are reported to the FNS Southwest Region office no later than forty five (45) days following the end of the DSNAP event. When completing the FNS-292B report, the State will use the current FNS guidelines for instruction on specific requirements. The State shall submit its final disaster figures electronically on the FNS-292B Report of SNAP Benefit and Commodity Distribution for Disaster Relief in the Food Programs Reporting System (FPRS).

Replacement benefits are reported for the month for which they are intended. The FNS-388 Monthly Issuance Report is used to report disaster issuances and participation figures, including replacement benefits.

### **Retention of Records**

DSNAP application forms with attachments, issuance records, and statistical reports will be retained by OKDHS for three (3) years following the specific DSNAP.

### **Fraud**

Fraud prevention measures will include computer cross-reference checks at the time of application to prevent duplicate participation and issuance, and displaying fraud posters in county offices informing the public of penalties for giving false information when making application for SNAP benefits. OKDHS staff will investigate complaints received alleging fraudulent receipt of SNAP benefits by DSNAP recipients. Complaints that local staff is unable to resolve will be referred to the Office of Inspector General for further investigation. SNAP policy

is in place indicating that all applications of OKDHS employees for the DSNAP are to be approved by the county director or their designee.

**Overissuance/Underissuance Claims**

OKDHS will establish claims against any household found to have received disaster SNAP benefits in excess of their entitlement and will restore lost benefits to households that received less than their entitlement due to agency error.

**Post-Disaster Review**

The AFS SNAP Section will conduct a post-disaster review of DSNAP activities by selecting and reviewing .05 Percent of new cases (not ongoing cases that received supplements), up to a maximum of 500 cases with a minimum sample size of 25 cases. OKDHS will check for employee fraud by auditing 100% of the State employee's cases who receive assistance for the DSNAP. Wage matches for State/County employees will be conducted as part of the post-disaster review process.