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United States
Department of
Agriculture

Food and
Nutrition
Service

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SUBJECT: Updated Supplemental Nutrition Assistance Program Pandemic Influenza Planning Information

TO: All Regional Administrators
Food and Nutrition Service

In December 2007, the Food and Nutrition Service (FNS) first transmitted guidelines for the operation of key nutrition programs during an influenza pandemic. FNS has recently reexamined our strategy for assisting low-income households during an influenza pandemic that causes a major increase in the need for nutrition assistance or requires State agencies to deliver programs without face-to-face contact with clients. This memorandum transmits updates to our influenza pandemic strategy as they apply to the Supplemental Nutrition Assistance Program (SNAP).

Originally, FNS projected that Disaster SNAP would be the primary nutrition assistance response during an influenza pandemic. The operation of Disaster SNAP requires a Presidential disaster declaration for Individual Assistance which may not be considered the appropriate response depending on the severity of a pandemic, its effect on States and other factors normally used to determine the need for a Presidential declaration. This makes reliance on Disaster SNAP as a primary response impracticable.

Currently, FNS is focusing efforts on ensuring that children who normally receive free or reduced price lunches at school continue to have access to nutrition assistance during school closures due to an influenza pandemic. Although the Centers for Disease Control and Prevention (CDC) now recommends school dismissal only when schools are not able to maintain normal functioning or when the pandemic starts to cause severe outbreaks, schools are still more likely to be subject to dismissal than other organizations or businesses. CDC recommends that when schools must dismiss students, they only do so for five to seven business days, so parents staying home to care for their children may not have lost income that would cause them to need the longer-term nutrition assistance offered by SNAP. Two responses are now available to State agencies: schools may serve meals through the Summer Food Service Program or the National School Lunch Program's Seamless Summer Option or may deliver Pandemic SNAP (P-SNAP) benefits to substitute for the value of the free or reduced price meals missed due to school closures. To view complete guidance on both options, please visit www.fns.usda.gov/disasters/pandemic/default.htm.

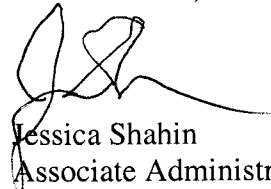
State SNAP agencies still must ensure the continuity of and safe access to their programs during severe pandemic influenza conditions or periods of social distancing. Should the pandemic be severe or prolonged, there may be an increase in demand for SNAP benefits due to household income loss due to illness 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 disease transmission. This revised guidance

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outlines flexibilities currently available through Federal regulations and suggestions for readying organizations to operate under such conditions.

When reviewing this guidance, State agencies will note that some of the flexibilities are appropriate for use at any time and others are appropriate only in a highly severe pandemic. SNAP agencies may wish to consult with State and local level pandemic planning authorities when determining when or if to employ any of these flexibilities.

The FNS influenza pandemic page at www.fns.usda.gov/disasters/pandemic/default.htm lists guidance and resources to help programs and communities plan for a pandemic. Please check the site periodically for updates. If you have questions about the SNAP Pandemic Influenza Planning Guidelines, please contact Melissa Daigle Katz at 415-705-1323, ext. 304.



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Attachment

SNAP Pandemic Influenza Planning Guidelines

State agencies will need to deliver SNAP services under a combination of conditions unlike those of any other disaster. Since Disaster SNAP is likely not to be a pandemic response option, State agencies must be prepared to operate SNAP using the flexibilities currently available through program regulations. State SNAP agencies should work within their agency and with State-level pandemic planning authorities to update their pandemic plans to reflect this new direction.

Making use of current policy flexibilities alone, however, is unlikely to prepare any State agency for successful program delivery during the most severe pandemic conditions. State agencies should also assess their business practices and technology to ensure that systems are capable of functioning in the most efficient manner possible. 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.

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

Updating Your State's Pandemic Plan

Not all State pandemic influenza plans currently contain procedures for nutrition assistance delivery during a severe pandemic. State agencies are encouraged to work with State pandemic planners to understand the conditions and constraints under which SNAP and P-SNAP may need to be delivered and to learn of non-SNAP nutrition solutions that may complement your program for households in need.

Actions	Resource
Obtain copy	www.pandemicflu.gov/professional/states/stateplans.html
Obtain contact information for State-level planning leadership	See www.pandemicflu.gov/professional/states/index.html#contacts and click on your State on the national map.
Find information on ongoing State-level planning activities	See www.pandemicflu.gov/professional/states/index.html#contacts and click on your State on the national map.
Understand the environment in which you may operate SNAP	<p><i>The use of social distancing</i></p> <ul style="list-style-type: none"> - What conditions will trigger the use of social distancing in your State? - How long will periods of social distancing be expected to last in your State? - What social distancing principles must you adopt for your own workplace?
	<p><i>State plans to distribute food to needy households</i></p> <ul style="list-style-type: none"> - How will food banks and pantries in your State deliver services during severe pandemic conditions? - Does your State plan to operate a Summer Food Service program or deliver P-SNAP benefits to ensure that children who qualify for free or reduced-price school meals continue to have access to adequate nutrition?
	<p><i>Grocery store operation</i></p> <ul style="list-style-type: none"> - What adaptive measures are planned by grocers in your State? These might include drive through service, home delivery, and internet or phone orders.

Policy Flexibilities

State agencies do not need to wait for severe pandemic conditions to make use of the following policy flexibilities. All are useful for improving program efficiency and access at any time.

Requirement	Summary	Regulation
Interviews	<ul style="list-style-type: none"> - Substitute telephone interviews for face-to-face interviews. - With an approved waiver, waive the recertification interview for elderly or disabled households with no earned income, although the State may not deny eligibility without an interview. - With an approved waiver, postpone the interview requirement for households eligible for expedited service. 	7 CFR 273.2(e)(2)
Application Filing	Allow clients to file applications by internet, mail or telephone.	7 CFR 273.2(c)(1)
Certification Periods	Use maximum allowable certification periods: 24 months for households in which all adult members are elderly or disabled, 12 months for all other households.	7 CFR 273.10(f)
Verification	Eliminate verification of items that are not required by Federal regulations.	7 CFR 273.2(f)
Issuance and Redemption	Allow participants to use the phone, fax, or internet to pre-order items.	
	Work with retailers to plan "drive-through" service at stores to avoid contact with others. Drive-through service necessitates the use of handheld EBT readers.	
	Work with retailers to gain internet-based food ordering and home grocery delivery service.	
	Partner with home meal delivery programs, such as <i>Meals on Wheels</i> -style services, for benefit delivery using the manual voucher process.	

Business Process and Technology Assessment

State agencies readying their operations for reduced or no face-to-face contact should consider at least the following process and technological issues.

<i>Question</i>	
Mail	Can your mailed application system (mailroom, mail distribution, key entry of application data) accommodate the anticipated volume of paper applications?
Telephone	<ul style="list-style-type: none"> - What volume of incoming and outgoing calls can your telephone system accommodate? - 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? - Do you have a staff person answering the main line or automation that will allow clients to proceed to their intended destination without having a bottleneck at a reception? - Do you have call center software that allows you to track calls and distribute calls to staff? - Do you have the capacity for automated calls to clients to give them information about changes to policy (like extended certification periods) so that they will not need to contact you? - Can you obtain or develop voice signature technology so that applicants can file their applications by phone?
Internet	<ul style="list-style-type: none"> - Do you have a web-based application for clients? - Do you have manual or automated distribution of received web-based applications to workers? - Do your servers have the capacity to handle increased web traffic?
Staffing	<ul style="list-style-type: none"> - Estimate what percent of your community's workforce will be absent from work during various stages of the pandemic. See www.cdc.gov/flu/tools/fluworkloss/ for an online tool. - Which administrative or technical activities are non-urgent and can be postponed until after the pandemic has ended? - How will you train staff that will temporarily transition from non-urgent tasks to essential ones? - Do you have work-at-home technology or policies that will allow your staff to continue to operate the FSP remotely?
Issuance	<ul style="list-style-type: none"> - Can you provide centralized mail issuance of EBT cards if you don't already? - Do you have enough EBT cards on hand to accommodate a potential increase in caseload? - Have you considered pre-pinning EBT cards so that the number of

Question

calls to the customer call center is reduced?

- Will grocers need hand held EBT card readers to accommodate drive-through service or will manual vouchers suffice? If manual vouchers are used, is there an adequate supply already available to grocers or could new supplies be generated quickly and in grocers' hands to use for drive-through or delivery sales?
- Will grocers in your area allow for internet-based food ordering and home grocery delivery with the use of an EBT food stamp debit card (without the entry of a PIN)? Currently, the commercial industry does not support the use of debit card payment over the internet when PIN-entry is required, but grocers can use manual vouchers, which allow a signature to substitute for a PIN.

Additional Pandemic Flu Resources

State agencies should find these Federal resources helpful as they update their pandemic plans.

Resource	Source	Purpose
www.Flu.gov	U.S. Department of Health and Human Services	State-by-State pandemic flu planning guidance for the workplace, the community, and individuals. Checklists, guides, copies of State plans, State-level contacts, and more.
www.cdc.gov/flu/tools/fluworkloss/	Centers for Disease Control	FluWorkLoss estimates the potential number of days lost from work due to an influenza pandemic. Users can change almost any input value, such as the number of workdays assumed lost when a worker becomes ill or the number of workdays lost due to a worker staying home to care for a family member. Users can also change the length and virulence of the pandemic so that a range of possible impacts can be estimated. FluWorkLoss provides a range of estimates of total workdays lost, as well as graphic illustrations of the workdays lost by week and percentage of total workdays lost to influenza-related illnesses.
www.cdc.gov/germstopper/work.htm	Centers for Disease Control	Downloadable tip sheet on workplace hygiene.
www.cdc.gov/flu/workplace/	Centers for Disease Control	Workplace posters, flyers, and online info for employee use.
http://training.fema.gov/EMIWeb/IS/is520.asp	FEMA	Interactive web-based course that introduces learners to the steps their organizations can take to minimize the effects of a pandemic.