DISASTER RELIEF ACTION PLAN

JUNE 2018

FEEDING TEXAS™
Feeding Texas wishes to thank Feeding America on behalf of various corporate and foundation donors for their contributions to our Hurricane Harvey relief efforts. This report would not have been possible without their support. We also wish to acknowledge our food banks for sharing their insights and expertise.

If you have any questions about this report, including the research or recommendations within this report, please contact Celia Cole | ccole@feedingtexas.org

ACKNOWLEDGMENT

Feeding Texas is a statewide, 501(c)3 nonprofit organization. Our mission is to lead a unified effort for a hunger-free Texas.

AUTHOR: Tara O’Neill, PhD
# Table of Contents

**Introduction** ............................................................................................................ 4

**Hazards Assessment** .............................................................................................. 6

**Governmental Response to Disasters and Feeding** ................................................ 7

**Review of Feeding Texas’ Response to Hurricane Harvey** ................................. 10

**Key Elements of Food Banks’ Disaster Preparedness** .............................................. 11

**Role of Feeding Texas During a Disaster** ............................................................... 13

**Feeding Texas Action Plan: Preparing for a Disaster** ............................................. 14

- Logistics/Supply Chain Management
- Communications
- Coordinating with Officials
- Operations at Feeding Texas

**Appendix A:** Timeline of Harvey Waivers and Programs ........................................ 18

**Appendix B:** Nutrition Programs and Disasters – An Advocacy Guide ................. 21

**Appendix C:** Sample Memorandum of Understanding .......................................... 26

**Appendix D:** General Emergency Management Process in Texas ..................... 28

**Appendix E:** Disaster Response Task List for Feeding Texas ............................. 29
INTRODUCTION

Purpose
Food banks fill a critical role in helping individuals, families, and communities survive disasters and recover afterward. The purpose of this plan is to prepare Feeding Texas and its network food banks to respond as quickly and efficiently as possible when the next disaster strikes.

This report serves two main purposes:

1. To gather in one place information that may be useful to Feeding Texas staff, board members and food bank staff when a disaster occurs or is imminent.

2. To identify the medium- to long-term steps that should be taken in the coming months to ensure a robust response from Feeding Texas and its network food banks to help with future disasters.

Scope
Feeding Texas will have a role to play whenever a disaster is large enough to trigger the need for mutual assistance among food banks. These are disasters that are too significant for a single food bank to respond to on its own or disasters that impact a food bank to the extent that it needs assistance maintaining its normal operations. This plan focuses on the roles and actions that Feeding Texas should be prepared to take in such situations.

This plan focuses on:

1. Disasters that overwhelm the ability of an individual network food bank to respond.

2. Disasters that have a large enough impact that coordination is needed at the local, state, or federal level.

Feeding Texas will also have role to play in smaller disasters. Even when a network food bank is able to respond adequately to a disaster, Feeding Texas may have a role to play in advocating for waivers that allow non-disaster nutrition programs to better serve people impacted by the disaster.

This plan is not an emergency operations or continuity of operations plans for individual food banks nor is it a business continuity plan for Feeding Texas.
Hazards Assessment

Because this plan focuses on disasters that are significant enough to trigger the need for mutual assistance among food banks, this section identifies those hazards that are most likely to create such a situation. The Texas Division of Emergency Management (TDEM) has identified the hazards that present the biggest threat to Texas based on frequency of occurrence and impact (Figure 1).

In the past ten years, Texas has had a total of 14 presidential major disaster declarations and five emergency declarations. These declarations were due to 12 different storms (and include damage from wind, flooding, and winter weather), three different wildfire outbreaks, and one explosion.¹

The hazards in Figure 1 are not a comprehensive list of those that might trigger a need for mutual assistance among food banks. There are certainly other hazards that are a threat to food banks in Texas. Rather, Figure 1 is meant to help illustrate how a major disaster in one area could tax the resources of a single food bank to such an extent that it requires assistance from other food banks. The recent devastation from Hurricane Harvey, which stretched across a 300-mile swath of Texas, makes it easy to imagine how a major disaster could disrupt food bank operations. However, wildfires across West Texas or a tornado outbreak in North Texas could easily tax a food bank’s resources to the extent that it needs assistance from the Feeding Texas network, especially if a food bank’s warehouse is impacted directly.

¹ Hurricane Ike, Hurricane Alex, and the fertilizer plant explosion in West, Texas, each received both a major disaster declaration and an emergency declaration.
TEXAS’ TOP HAZARDS OF CONCERN FOR MITIGATION

Figure 1: Texas Division of Emergency Management Identified Hazards
Adapted from State of Texas Hazard Mitigation Plan, 2013 Update

#1 Floods are historically one of the most frequently occurring, destructive and costly natural hazards facing Texas, constituting over 90 percent of the disaster damage that has been experienced in the state, with few areas completely free from the threat. Besides real property damage or loss and drowning deaths, other consequences are river bank erosion and infrastructure damage or loss. On the average, Texas suffers approximately 400 floods annually, particularly along the coast and in Central Texas.

ANNUALIZED LOCAL LOSSES
$5,574,820

#2 Hurricanes and Tropical Storms are the most destructive of all weather phenomena, hurricanes, causing damages from high winds and surge. The risk to the Texas Gulf coast counties and inland adjacent counties (22 counties, 181 jurisdictions) covers 28 percent of the total state population. Since 1953, Texas has experienced 23 federal disaster declarations due to hurricane/tropical storms events, the most recent being Hurricane Dolly (DR1780); Hurricane Ike (DR-1791); and Hurricane Alex (DR-1931).

ANNUALIZED LOCAL LOSSES
$1,488,691

#3 Wild Fires in 2011 caused Texas $500 million in wildfire and WUI damages. The Bastrop County Fire accounted for about $325. West Texas is highly susceptible to wildfire. Annualized local losses are not captured due to reporting standards.

ANNUALIZED LOCAL LOSSES
$N/A

#4 Tornado occurrences average about 125 a year. The annual total varies considerably, and certain areas are struck more often than others. Tornadoes occur with greatest frequency in the Red River Valley, just north of the Dallas/Fort Worth Metroplex.

ANNUALIZED LOCAL LOSSES
$3,100,000

#5 Droughts typically produce few physical losses but the economic losses can be tremendous. Drought extended across most of Texas during 2011-2012.

ANNUALIZED LOCAL LOSSES
$325,000,000

#1 Floods are historically one of the most frequently occurring, destructive and costly natural hazards facing Texas, constituting over 90 percent of the disaster damage that has been experienced in the state, with few areas completely free from the threat. Besides real property damage or loss and drowning deaths, other consequences are river bank erosion and infrastructure damage or loss. On the average, Texas suffers approximately 400 floods annually, particularly along the coast and in Central Texas.

ANNUALIZED LOCAL LOSSES
$5,574,820

#2 Hurricanes and Tropical Storms are the most destructive of all weather phenomena, hurricanes, causing damages from high winds and surge. The risk to the Texas Gulf coast counties and inland adjacent counties (22 counties, 181 jurisdictions) covers 28 percent of the total state population. Since 1953, Texas has experienced 23 federal disaster declarations due to hurricane/tropical storms events, the most recent being Hurricane Dolly (DR1780); Hurricane Ike (DR-1791); and Hurricane Alex (DR-1931).

ANNUALIZED LOCAL LOSSES
$1,488,691

#3 Wild Fires in 2011 caused Texas $500 million in wildfire and WUI damages. The Bastrop County Fire accounted for about $325. West Texas is highly susceptible to wildfire. Annualized local losses are not captured due to reporting standards.

ANNUALIZED LOCAL LOSSES
$N/A

#4 Tornado occurrences average about 125 a year. The annual total varies considerably, and certain areas are struck more often than others. Tornadoes occur with greatest frequency in the Red River Valley, just north of the Dallas/Fort Worth Metroplex.

ANNUALIZED LOCAL LOSSES
$3,100,000

#5 Droughts typically produce few physical losses but the economic losses can be tremendous. Drought extended across most of Texas during 2011-2012.

ANNUALIZED LOCAL LOSSES
$325,000,000
GOVERNMENTAL RESPONSE TO FEEDING AND DISASTERS

**Government Agencies Involved in Feeding During Disasters**

Governmental agencies at all levels are involved in feeding activities when a major disaster strikes. The federal government works closely with state and local agencies as well as non-governmental organizations (NGOs) that have been identified as partners. This section focuses on nutrition programs designed to respond to disasters. It also includes an overview of how nutrition programs that operate under normal circumstances can be modified to further help people impacted by disasters.

At the federal level, the strategy for disaster response is laid out in the National Response Framework. The Framework outlines how all partners — federal, state, local, and NGOs — work together to provide a coordinated response to domestic incidents. A series of annexes to the National Response Framework describes the Emergency Support Functions (ESF) that are the mechanisms through which resources and capabilities are coordinated and provided. Both ESF #6 and #11 address feeding: ESF #6 covers “Mass Care, Emergency Assistance, Temporary Housing, and Human Services” and ESF #11 covers “Agriculture and Natural Resources.”

The two major federal agencies that are a part of the feeding response are the Federal Emergency Management Agency (FEMA) and the U.S. Department of Agriculture (USDA). FEMA is charged with overall coordination of the disaster response. USDA’s Food and Nutrition Service (FNS) is the primary agency in charge of feeding and nutrition assistance. Both FEMA and USDA work through state partner agencies. In Texas, these agencies are the Texas Division of Emergency Management (TDEM), the Texas Health and Human Services Commission (HHSC) and the Texas Department of Agriculture (TDA). The state agencies are the connection between the federal agencies and local officials and NGOs.

**Disaster Programs**

**AFTER A DISASTER, FNS ADDRESSES FEEDING & NUTRITION ASSISTANCE IN 2 MAIN WAYS:**

1. Approval of the use of USDA foods already in local inventories
2. Approval for a state to implement a Disaster Supplemental Nutrition Assistance Program (D-SNAP).

**USDA Foods: Congregate Feeding and Household Distribution**

Although NGOs that provide food after a disaster get their food from a variety of sources, the USDA is frequently called upon to make food available after a disaster. States and local entities have on hand stores of USDA foods which can be critical after a disaster. For The Emergency Food Assistance Program (TEFAP), the National School Lunch Program (NSLP), the Commodity Supplemental Food Program (CSFP), the Child and Adult Care Food Program (CACFP), and the Summer Food Service Program (SFSP). After Hurricane Katrina over 22 million pounds of USDA foods were provided through congregate feeding and household distribution. After Hurricane Sandy, over 1.1 million pounds of USDA foods were provided through those programs.²

USDA foods can be supplied to congregate feeding sites, such as shelters, and directly to households through the disaster household distribution program. When USDA foods are needed to respond to a disaster in Texas, the Texas Department of Agriculture is responsible for making a request to the USDA. USDA foods can be released after the request is approved by FNS headquarters.

---

The sizes of food containers in local inventories of USDA foods can impact which foods are used for different distribution programs. Frequently, food purchased for programs such as the NSLP are more appropriate for use at congregate feeding sites because they are institutional size containers. Conversely, household distribution should use smaller containers; therefore, it’s often better to rely on inventories for programs designed for household distribution, such as TEFAP.

USDA foods that are deployed after a Presidentially-declared disaster will be replenished by FNS as long the requirements related to prior approval are met: For congregate feeding, the distributing agency (in Texas, TDA) has the authority to release foods; for household distribution, FNS headquarters must approve the release of food.

USDA foods may also be released following an incident that TDA or FNS believe warrants the use of USDA foods. In these “situations of distress,” foods will be replaced by FNS only to the extent that funds are available. For situations of distress that are the result of a natural catastrophe, the distributing agency (TDA) may approve the release of food for congregate feeding for up to 30 days. For situations of distress that are the result of non-natural disasters, FNS headquarters’ approval must be received prior to release. For household distribution, prior approval by FNS headquarters must be received in all cases.
### Table 1: Activation and Administration of Disaster Nutrition Assistance Programs

<table>
<thead>
<tr>
<th>Agencies Involved in Program Administration</th>
<th>D-SNAP</th>
<th>CONGREGATE FEEDING</th>
<th>HOUSEHOLD DISTRIBUTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS)</td>
<td>• U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS)</td>
<td>• U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS)</td>
<td>• U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS)</td>
</tr>
<tr>
<td>• Texas Health and Human Services Commission (HHSC)</td>
<td>• Texas Department of Agriculture (TDA)</td>
<td></td>
<td>• Texas Department of Agriculture (TDA)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Conditions That Must Be Met for Program to Be Activated</th>
<th>D-SNAP</th>
<th>CONGREGATE FEEDING</th>
<th>HOUSEHOLD DISTRIBUTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Presidential declaration of disaster OR Commercial channels of food distribution were disrupted and Commercial channels of food distribution are now available</td>
<td>• Presidential disaster declaration OR Situation of distress</td>
<td></td>
<td>• Presidential disaster declaration OR Situation of distress</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Approval Process</th>
<th>D-SNAP</th>
<th>CONGREGATE FEEDING</th>
<th>HOUSEHOLD DISTRIBUTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• HHSC submits request to operate a D-SNAP program to USDA/FNS Regional Office (RO)</td>
<td>• TDA identifies local disaster organization responsible for coordinating disaster feeding Disaster feeding organization makes a request to TDA for USDA foods for congregate feeding Presidentially-Declared Disasters TDA approves request and notifies FNS Regional Office Situations of Distress TDA approves request for natural disasters or forwards request to FNS Regional Office, which forwards it to FNS Headquarters</td>
<td></td>
<td>TDA begins application process once it receives reports from the State Operations Center that a need exists and that D-SNAP cannot operate at the time TDA submits request to USDA/ FNS Regional Office (RO) USDA/FNS RO transmits request to FNS headquarters</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Important Aspects of Program</th>
<th>D-SNAP</th>
<th>CONGREGATE FEEDING</th>
<th>HOUSEHOLD DISTRIBUTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• County officials determine locations for application sites</td>
<td>• TDA collects information about food available in local warehouses as part of the request to FNS</td>
<td></td>
<td>Request from TDA to FNS must request specific types and amounts of food TDA provides assurance that commodity assistance and D-SNAP benefits will not be provided simultaneously to the same household TDA must describe the system that will be implemented to prevent dual assistance</td>
</tr>
</tbody>
</table>

### Disaster Supplemental Nutrition Assistance Program (D-SNAP)

The Disaster Supplemental Nutrition Assistance Program (D-SNAP) is a complementary program to the SNAP program, the federal nutrition program formerly known as “food stamps.” Typically, D-SNAP is authorized only after a presidential declaration of a major disaster although the Secretary of Agriculture may also approve a state’s request to issue D-SNAP benefits when commercial channels of food distribution have been disrupted and then restored after a disaster. According to the Food Research and Action Center (FRAC)³, some examples of disasters for which D-SNAP has been authorized include “forest fires in Arizona, a tornado in Iowa, windstorms in Tennessee, a blackout in Michigan, (and) ice storms in Oklahoma” among others.

Like its counterpart, SNAP, D-SNAP benefits can be used by recipients to purchase food at grocery and other stores. Although D-SNAP eligibility is income limited, many people who would not normally qualify for SNAP qualify for D-SNAP.

---

Waivers for Non-Disaster Programs

In addition to implementing programs specifically designed to respond to disasters, federal agencies can grant waivers that allow regular federal nutrition programs to better serve people who have been impacted.

Programs that frequently receive waivers after a disaster include SNAP, NSLP, and the Special Supplemental Program for Women, Infants, and Children (WIC).

One common type of waiver expands the type of foods that recipients can purchase with their benefits. For SNAP recipients, waivers can allow them to buy hot foods. For people who are displaced from their homes or whose kitchens were damaged, buying prepared, ready-to-eat foods is an important option. For WIC recipients, waivers can expand the varieties of foods that they can buy. WIC benefits typically must be used to buy specific brands and sizes of packages for covered foods. However, when supply lines are disrupted, it can be difficult for WIC recipients to find these exact packages. Waivers provide needed flexibility at these times.

Another common waiver is mass replacement of lost food. Typically, individual SNAP recipients can request replacement of food lost to a hardship such as a power outage or water damage. After a disaster, when many SNAP recipients in an area likely lost food, state agencies can request approval to issue replacement benefits for all recipients in an impacted area.

Review of Feeding Texas’ Response to Hurricane Harvey

Hurricane Harvey made landfall in August 2017 as a Category 4 storm. Communities along the Texas coast experienced winds of over 130 miles per hour and a storm surge of 12 feet in some locations. Over the next five days, the storm dropped historic amounts of rain in the coastal areas of Texas, including over 50 inches in the Houston metro area. Homes, schools, and businesses were flooded from Corpus Christi to Beaumont – a 300-mile stretch of coastal Texas.

Although disasters as large as Harvey are rare, the experience provided an opportunity for Feeding Texas and its network food banks to evaluate their actions during the response and recovery phases. Six food banks in the Feeding Texas network were directly impacted by the storm. Many others were indirectly impacted as they supported their sister food banks as well as evacuees in their own service areas.

Five months after the storm, a survey was sent to all Feeding Texas food banks. A summary of the responses is included here. A more detailed write up can be found in Appendix B.

Food banks were asked to provide feedback about what they, their fellow food banks, and Feeding Texas/Feeding America did well in response to Hurricane Harvey and what they could do better in the future. In some cases, a given theme or issue came up multiple times across responses; in others, there was no single issue that clearly garnered more comments than others.
**With respect to managing the supply chain:**

- The highest number of positive comments were received about communication and coordination.
- The highest number of negative comments were received about inbound product and warehouse/storage space.

**With respect to communication:**

- The highest number of positive comments were received about “daily” communication and direct contact between food banks.
- No single issue received a clearly higher number of negative comments.

**With respect to coordinating with officials, comments were equally mixed positive and negative:**

This is true for both food banks that were in areas directly impacted by the storm and food banks that were indirectly impacted by the storm.

**With respect to volunteer management and donations:**

- The highest number of positive comments were received about managing/coordinating volunteers.
- The highest number of negative comments were received about the same issue, managing/coordinating volunteers.

---

**KEY ELEMENTS OF FOOD BANKS’ DISASTER PREPAREDNESS**

Although this plan focuses on Feeding Texas’ preparedness, there are many actions that all food banks should take as part of their own disaster planning. As the Hazards Assessment section above shows, there are multiple hazards that threaten all regions of the state. All Texas food banks should be prepared to handle a disruption to their operations and an increase in food insecurity in the communities they serve. This section provides a brief overview of some critical aspects of disaster planning that food banks should consider when evaluating their disaster preparedness.

**Business Continuity Plan**

Nearly all Feeding Texas Food banks have disaster plans in place. These plans should outline procedures to ensure business continuity when a disaster impacts the food bank’s operations directly as well as procedures for disasters that impact the service area of the food bank. These plans should be updated at least annually and when there are significant changes in the operations or organization of a food bank.

**Agency Management Plan**

The agencies that food banks support are an essential part of the supply chain that feeds their communities. When a disaster strikes, these agencies may have their operations interrupted. Food banks should develop plans that outline procedures related to:

- Contacting agencies when a disaster threatens to determine the agencies’ plan with respect to operations, and
- Establishing a communication plan to monitor whether agencies are open and operating as normal.

Food banks should also evaluate their procedures for adding new agencies and food distribution organizations. If not already in place, procedures should be developed that allow for the quick addition of new agencies to help meet the increase in demand for nutritious food after a disaster.
Memorandum of Understanding between Food Bank and Local Officials

Entering into a memorandum of understanding (MOU) with city or county officials is one of the best ways that a food bank can plan for a future disaster. An MOU outlines what assistance a food bank is able to provide to local jurisdictions following a disaster and what support the food bank needs in return. A sample MOU is provided in Appendix C.

Operational Lessons Learned from Previous Disasters

The logistics of receiving, sorting, and distributing food change after a disaster. Food banks should have operational plans in place to make sure they can quickly implement the necessary procedures.

1. Food banks need to be able to report on their inventories quickly when a disaster strikes.

As one of the first steps in preparing to release USDA foods, TDA will collect information about what foods are in inventories at food banks and other distributors. Food banks should have a good understanding of everything they have on-hand, not just USDA foods. This information will help them know exactly what types of food and what amounts are needed.

2. Food banks that are requesting USDA foods need to be able to request specific types and amounts of foods.

When TDA submits a request for food to FNS, it must submit a detailed request that breaks down the food needed by individual product and the amount needed. In order to do this accurately, TDA must collect this information from food banks. It can be difficult to provide this detailed information in the midst of disaster response, so planning ahead can help food banks do so more quickly and accurately.

3. Food banks should pass all requests through the State Operations Center (SOC) when it is activated.

The formal process for requests for food after a disaster require that requests to federal agencies go through state agencies. These agencies have representation at the SOC. Submitting requests through the SOC ensures that state officials are aware of the conditions throughout the state.

4. Food banks should be prepared to track the distribution of disaster foods separate from food that has been donated or otherwise procured.

After a major disaster, all of a food bank’s distributions might be related to the disaster. However, at some point after a disaster, a food bank will likely find that only some of their operations are related to the disaster. Food banks need to plan in advance for a system to easily and accurately track the amount of food that is being distributed due to increased demand from the disaster compared to normal distribution. Furthermore, food banks need to be prepared to track food from federal nutrition programs separately from disaster foods that come from other sources. Food banks will be required to report to state and federal officials the amount of food distributed under a federal program. Food banks will also want to be able to report to funders and donors about their total activities in response to a disaster.
ROLE OF FEEDING TEXAS DURING A DISASTER

When a disaster happens somewhere in Texas, the Feeding Texas network of food banks are on the front lines feeding people and providing food to NGOs that distribute it. Feeding Texas serves as the hub of the network, helping to improve the flow of goods through the supply chain, collect and disseminate information, manage fund and food donations, and provide operational support to food banks. Feeding Texas also represents the interests of network food banks and the people they serve with governmental officials.

The primary roles of Feeding Texas during a disaster are listed below:

Stay informed about conditions and response activities statewide
Because Feeding Texas has a presence at the state emergency operations center and/or on the statewide feeding task force, one of the primary roles that Feeding Texas plays during a disaster is to understand the statewide picture. Feeding Texas makes sure that information flows between network food banks and other emergency response organizations.

Stay informed about current needs and capacity of network food banks
During a disaster, conditions on the ground can change rapidly. Feeding Texas serves as a hub of information to help connect available resources from network food banks with needs on a daily basis to increase the effectiveness of our network to serve communities throughout Texas during a disaster.

Coordinate donations of money and product from external partners
When a major disaster strikes, people and organizations across the country want to send help. This assistance often comes in the form of large quantities of donated food and grocery supplies, as well as financial support. In the case of product donations, Feeding Texas takes on the role of understanding what product is being offered and knowing which food banks need and can receive the product and directing product accordingly. For financial donations, Feeding Texas serves as both a recipient and distributor of those donations.

Reach out to elected and other governmental officials
Feeding Texas is able to speak with a single voice for food banks throughout the state of Texas. During a disaster, Feeding Texas uses its voice to raise the profile of issues related to feeding and to engage elected officials and other governmental officials.

Serve as a point of contact for governmental partners
In addition to proactively communicating with government partners, Feeding Texas also serves as a known point of contact for officials. Feeding Texas’ understanding of the current status of network food banks during and after a disaster can help improve the flow of information and goods between state and federal agencies and food banks.

Communicate with news media
Feeding Texas communicates the role that food banks play under normal circumstances and during disasters. It also helps provide information about how individuals and community organizations can best contribute to response and recovery efforts.
FEEDING TEXAS ACTION PLAN: PREPARING FOR A DISASTER

One of the primary purposes of this document is to create an action plan for Feeding Texas as it prepares for future disasters that may impact network food banks. This section outlines specific steps that Feeding Texas should take over the next several months. The objectives and tasks below will:

1. Ensure that Feeding Texas is ready to serve as the hub of the network during a disaster.
2. Help Feeding Texas support network food banks as they develop their own disaster preparedness plans.
3. Help Feeding Texas fulfill its mission of leading the effort to fight hunger throughout Texas after a disaster.

Logistics/Supply Chain Management

Managing the supply chain of food supplies is at the core of what food banks do – during disasters and under normal conditions. When a disaster strikes, the amount of product that food banks move increases substantially. Ramping up to handle the increase is critical to successfully responding to a disaster.

One of the biggest challenges facing food banks after a disaster strikes is tracking how much and what type of product they move and reporting this information. Food banks need to be able to track disaster pounds separately from regular pounds so that they can report to government agencies. Also, they may need to report on their response to donors and will want to be able to tell the story of their response in the future.

Objective 1: Improve ability of Feeding Texas and food banks to track needed, available, and distributed product

Task 1.1: Build a system at Feeding Texas to keep track of product available from network food banks and product needed at network food banks that can be updated as information comes in

Task 1.2: Work with food banks to create a system to expedite or even automate reporting to Feeding Texas using or leveraging existing inventory software capabilities

Task 1.3: Document existing disaster box inventories throughout network food banks annually

Task 1.4: Work with Feeding America to develop conversion tables to allow food banks to convert requests for pallets or truckloads to pounds to make it easier for food banks to request disaster foods

Task 1.5: Work with Feeding America to develop cost conversion tables for FEMA reimbursements to convert pounds or truckloads to unit cost (used by FEMA)

Objective 2: Increase the ability of food banks to move product quickly during times of disaster

Task 2.1: Establish protocols with USDA and FEMA that will lead to earlier release of federal food supplies

Task 2.2: Create network plans to stage materials that identify how to pre-stage materials either before a disaster or in the immediate aftermath (for disasters that are not predictable).
Communications

Communications are always a challenge when a disaster strikes. The volume of phone calls and emails increases significantly, often at a time that some key people may be difficult to reach. External organizations – from donors and volunteers to members of the media – frequently do not know who to contact and will reach out to anyone they can get by phone or email. Developing plans to handle the increase in communications and to be proactive in disseminating important information is critical to managing communications after a disaster.

Objective 3: Establish communications protocols for when a disaster strikes somewhere in Texas

Task 3.1: Set up a schedule for communications between Feeding Texas and food banks in advance of and during a disaster

Task 3.2: Determine platform(s) for communication between Feeding Texas and food banks

Task 3.3: Identify top three points of contact at each food bank for matters related to the supply chain

Task 3.4: Develop a plan to handle the large volume of phone calls, texts, and emails that come into Feeding Texas during a disaster

Task 3.5: Establish protocols with Feeding America for communication related to inbound product

Objective 4: Develop communication materials that can be used when a disaster strikes

Task 4.1: Create social media messages that promote the role of food banks in responding to disasters

Task 4.2: Create social media messages that provide information to the public about the best ways to help after a disaster

Task 4.3: Create press releases for news media that promote the role of food banks in responding to disasters

Task 4.4: Create press releases for news media that provide information about the best ways for the public to help after a disaster

Task 4.5: Create content for the Feeding Texas webpage that directs external organizations and people to the appropriate places

Task 4.6: Establish contact points for external inquiries, including product donations, monetary donations, and press inquiries

Objective 5: Support food banks in their communication strategies and coordinate with their communication plans

Task 5.1: Develop network communication plan in conjunction with food banks that identifies ways that Feeding Texas can support food banks’ communication staff before, during, and after a disaster

Task 5.2: Work with network food banks to ensure consistent messaging to external audiences from Feeding Texas and network food banks

Task 5.3: Work with network food banks and HHSC to develop outreach plans to inform agency and shelter partners and evacuees about D-SNAP availability and eligibility
**Coordinating with Officials**

Feeding Texas is the center of a network of food banks that serve every county in Texas. After a disaster, many food banks are responding to the needs in their individual service areas and sometimes, when needed, other food banks’ service areas. At these times, it is especially important that Feeding Texas be able to communicate the overall picture of response and recovery to government officials.

**Objective 6: Strengthen formal relationships with state agencies on behalf of network food banks**

**Task 6.1:** Enter into an MOU with HHSC on behalf of network food banks that allows food banks to assist in the D-SNAP enrollment process and hand out water and snacks at D-SNAP registration sites

**Task 6.2:** Enter into an MOU with FEMA on behalf of network food banks that allows food banks to provide nutrition assistance to evacuees staying in transitional shelter assistance

**Task 6.3:** Work with state officials to have Feeding Texas be a part of the state disaster feeding plan

**Objective 7: Prepare to maximize the benefits of nutrition programs after a disaster**

**Task 7.1:** Establish a threshold above which Feeding Texas and its network of food banks begin advocating for the release of TEFAP for household distribution program

**Task 7.2:** Advocate with state and federal officials for a robust and effective D-SNAP as well as waivers to non-disaster programs

**Task 7.3:** Partner with network food banks and state officials to increase awareness of benefits of the D-SNAP program among local officials
**Operations at Feeding Texas**

When a large disaster strikes anywhere in Texas, the operations at Feeding Texas are impacted because Feeding Texas supports network food banks as they respond to disasters. Also, because Feeding Texas has a high profile and is recognized as the hub of the network of food banks throughout Texas, donations increase significantly to Feeding Texas, presenting a different kind of operational challenge.

**Objective 8: Develop an operations plan to offer quick, meaningful, and sustained support of network food banks during a disaster**

**Task 8.1:** Create a staffing plan to deploy key Feeding Texas staff to assist in the immediate disaster response

**Task 8.2:** Create a backup staffing plan for key Feeding Texas staff involved in disaster response and recovery

**Objective 9: Improve management of monetary donations to Feeding Texas**

**Task 9.1:** Develop system to handle the large number of donations that are received and that can track donations from multiple sources as they are received

**Task 9.2:** Develop guidelines that would govern disbursement of funds received by Feeding Texas to network food banks to allow for quick disbursement
**APPENDIX A: TIMELINE OF HARVEY WAIVERS AND PROGRAMS**

**Waivers and Approvals**

After Hurricane Harvey, the Texas Department of Agriculture (TDA) and the Texas Health and Human Services Commission (HHSC) requested many waivers from the federal agencies that administer several nutrition programs. A summary of these waivers is provided below.

*Table 2: Waivers and Approvals Related to Federal Nutrition Programs after Hurricane Harvey*

<table>
<thead>
<tr>
<th>DAYS AFTER LANDFALL</th>
<th>DATE</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>August 31</td>
<td><strong>SNAP hot foods waiver</strong> - This waiver allowed SNAP recipients to purchase hot, ready-to-eat foods with their benefits.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>SNAP September benefits issued on first day of the month</strong> - SNAP benefits are typically distributed to recipients throughout the month. Each recipient receives his/her benefits on the same day each month. The day varies from person to person. This waiver issued SNAP benefits to current recipients on the first day of September instead of the recipient's normal day.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Meal pattern waivers</strong> - This waiver allowed schools and other institutions to serve meals that did not conform to the standard meal pattern. These waivers apply to the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and the Commodity Supplemental Food Program (CSFP).</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Schools able to feed impacted students under NSLP</strong> - This waiver allowed schools in the impacted areas to serve free lunches to all students for at least one month after the storm. It also allowed displaced students to be served free lunches at the school they were attending.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Two CSFP boxes in September</strong> - This waiver allowed participants who received a box of food through the Commodity Supplemental Food Program in August to receive two boxes in September to make up for possible loss of August food. While USDA approved the waiver, no Texas food banks applied to TDA to make use of it.</td>
</tr>
<tr>
<td>7</td>
<td>September 1</td>
<td><strong>SNAP mass replacement of lost benefits</strong> - This waiver allowed HHSC to replace August SNAP benefits for all recipients in 29 impacted areas to replace any food that was lost due to the hurricane.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Extended time to apply for replacement benefits</strong> - This waiver gave impacted SNAP recipients in 58 impacted counties a longer period to apply for replacement benefits for food lost due to the hurricane.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>SNAP extension</strong> - This waiver allowed an extension of the certification period for SNAP recipients whose benefits were set to expire in August, September, or October.</td>
</tr>
<tr>
<td>10</td>
<td>September 4</td>
<td><strong>Expanded variety of certain WIC foods approved</strong> - This waiver reduced the limitations on the type and size of foods that can be purchased with WIC benefits in light of disrupted supply lines.</td>
</tr>
<tr>
<td>13</td>
<td>September 7</td>
<td><strong>Disaster Household Distribution approved</strong> - The use of USDA foods for household distribution was approved.</td>
</tr>
<tr>
<td>17</td>
<td>September 11</td>
<td><strong>D-SNAP approved</strong> - The implementation of a Disaster SNAP program was approved.</td>
</tr>
<tr>
<td>19</td>
<td>September 13</td>
<td>First D-SNAP application site opened</td>
</tr>
<tr>
<td>-2 months</td>
<td>October 27</td>
<td><strong>Extension of waivers for NSLP, SBP, and CACFP</strong> - The waivers granted at the end of August were extended for a limited number of counties.</td>
</tr>
<tr>
<td>-4 months</td>
<td>December 27</td>
<td><strong>Extension of waivers for NSLP and SBP</strong> - The waivers granted at the end of August were extended for a limited number of counties.</td>
</tr>
<tr>
<td>-5 months</td>
<td>February 1</td>
<td><strong>Extension of waivers for NSLP and SBP</strong> - The waivers granted at the end of August were extended for a limited number of counties.</td>
</tr>
</tbody>
</table>
Table 3 on the next page (p. 20) shows the counties where a D-SNAP program was operated and the dates that residents could apply for benefits. In most counties, the application period lasted seven days. The typical application center was opened to people by first letter of last name for the first five days. For example, the first day may have been open to people whose last names ended in A – C. The last two days of the seven-day application period were open to all residents.

As the table shows, the typical application period for a county was seven days.
- Harris County was granted an extension for the application period because of the number of people who were still in need after the initial application period. Application sites in Harris County operated for a total of 18 days.
- TDA submitted a request to extend the application period in Nueces County because of the number of people who were waiting to be helped on the last day of the regular application period. This request was submitted while the application center was still open and was approved by FNS.
- Fort Bend County requested to have its application period re-opened three weeks after the initial application period had ended. FNS denied TDA’s request to re-open applications in Fort Bend.

The dates of the application periods show how important it is for local officials to be prepared to act once a D-SNAP program is approved. While HHSC administers the program, the agency relies on county officials to provide the location for the application site in each county. After Hurricane Harvey, the D-SNAP program was rolled out in counties over a period of five weeks. The first application sites were opened in 11 counties on September 13 – a mere two days after the state received approval to operate a D-SNAP program from FNS. The last counties in the rollout took much longer: in six counties application sites opened three weeks or more after the D-SNAP program was approved for Texas. While many factors are involved in opening an application site in a given county, having a location for the site is a minimum requirement. Having county officials locate potential sites in advance and negotiate the terms under which these sites could be used will remove one of the potential barriers to opening D-SNAP application sites quickly throughout a disaster area.
Table 3: D-SNAP Application Periods after Hurricane Harvey

<table>
<thead>
<tr>
<th>County</th>
<th>Application Period Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aransas</td>
<td>Sept. 19 - 25</td>
</tr>
<tr>
<td>Austin</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Bastrop</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Bee</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Brazoria</td>
<td>Sept. 18 - 24</td>
</tr>
<tr>
<td>Calhoun</td>
<td>Sept. 18 - 24</td>
</tr>
<tr>
<td>Chambers</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Colorado</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Dewitt</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Fayette</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Fort Bend</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Galveston</td>
<td>Oct. 9 - 15</td>
</tr>
<tr>
<td>Goliad</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Gonzalez</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Hardin</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Harris</td>
<td>Sept. 22 - Oct. 6, Oct. 18 - 20</td>
</tr>
<tr>
<td>Jackson</td>
<td>Sept. 28 - Oct. 4</td>
</tr>
<tr>
<td>Jasper</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Jefferson</td>
<td>Oct. 2 - 8</td>
</tr>
<tr>
<td>Karnes</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Kleberg</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Lavaca</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Lee</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Liberty</td>
<td>Oct. 2 - 8</td>
</tr>
<tr>
<td>Matagorda</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Montgomery</td>
<td>Oct. 16 - 20</td>
</tr>
<tr>
<td>Newton</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Nueces</td>
<td>Sept. 19-25 and 27</td>
</tr>
<tr>
<td>Orange</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Polk</td>
<td>Sept. 18 - 23, Sept. 25 - 26</td>
</tr>
<tr>
<td>Refugio</td>
<td>Sept. 19 - 25</td>
</tr>
<tr>
<td>Sabine</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>San Jacinto</td>
<td>Sept. 27 - Oct. 3</td>
</tr>
<tr>
<td>San Patricio</td>
<td>Sept. 19 - 25</td>
</tr>
<tr>
<td>Tyler</td>
<td>Sept. 13 - 19</td>
</tr>
<tr>
<td>Victoria</td>
<td>Sept. 28 - Oct. 4</td>
</tr>
<tr>
<td>Walker</td>
<td>Sept. 25 - Oct. 1</td>
</tr>
<tr>
<td>Waller</td>
<td>Oct. 5 - 11</td>
</tr>
<tr>
<td>Wharton</td>
<td>Oct. 9 - 15</td>
</tr>
</tbody>
</table>
Federal nutrition programs – both those designed to respond to disasters and those that operate under normal circumstances – can play an important role in making sure that people impacted by disasters receive the food assistance they need. After Hurricane Harvey, the federal and state agencies that administer these programs took many steps that allowed nutrition programs to be used to respond to need throughout Texas. In the future, many of these same steps should be taken when a disaster happens; there are several other policies that should be implemented as well.

Below are some recommendations that will help improve the ability of governmental agencies and their NGO partners to meet the needs of people who have been impacted by disasters. The first section highlights policies and waivers that were implemented in Texas after Harvey. The second section focuses on other policies that should be adopted.

**Policies Implemented After Harvey**

**Food loss alone should serve as a basis for eligibility for D-SNAP benefits.**

To be eligible for D-SNAP, applicants must meet income limits. Households that have suffered economic losses due to a disaster should be evaluated using the same measures, whether the loss is due to damage to a residence, expenses related to evacuation, or loss of food. Furthermore, D-SNAP is specifically intended to prevent food insecurity, which is another reason loss of food alone should be enough to qualify for benefits under that program.

When states request to operate a D-SNAP program, the application to USDA’s Food and Nutrition Services (FNS) must indicate whether food loss alone will serve as a basis for eligibility. After Harvey, the Texas Health and Human Services Commission (HHSC) requested and was approved to serve people whose only disaster-related expenses were due to food loss. In the future, the state should continue to make this request in applications to operate D-SNAP.

**D-SNAP recipients should be able to choose a standard deduction in lieu of actual expenses.**

In determining income eligibility for D-SNAP, applicants are able to deduct disaster-related expenses, such as home or business repairs, evacuation costs, and medical expenses due to a disaster-related illness or injury. After Hurricane Harvey, households that had disaster expenses of at least $100 (including some expenses beyond food loss) were able to use a Disaster Standard Expense Deduction when applying for D-SNAP rather than having to track and report actual expenditures. This approach reduces the burden that families face documenting their economic losses at a difficult time, and future applications to administer a D-SNAP program should indicate that this approach will be used.

**SNAP recipients in the impacted areas should have monthly benefits automatically loaded at the beginning of the next month instead of their usual disbursement date.**

Although it is not specifically designed to respond to disasters, the SNAP program is a critical part of recovery for people who are already receiving benefits and are impacted by a disaster. After Hurricane Harvey, HHSC requested and received a waiver from FNS that allowed it to distribute benefits to SNAP recipients in 29 counties on September 1 rather than waiting for each recipient’s normal disbursement date. This meant that families could afford nutritious food even if they had suffered economic setbacks because of Harvey. Given the broad scope of the disaster, it was clear that thousands of SNAP recipients were likely impacted. Issuance of benefits on the first of the month meant that families experiencing economic hardships due to the disaster had one less thing to worry about at a time of crisis.
SNAP recipients in the impacted areas who are scheduled for recertification within 60 days of the disaster should automatically have their cases extended by six months.

SNAP recipients must periodically be recertified in order to continue to receive benefits. As part of recertification, recipients must submit a form and attend an interview (which may be conducted by phone). The majority of people continue to receive SNAP benefits after recertification.

After Harvey, HHSC received a waiver from FNS to extend the eligibility period for households in impacted areas who were due for recertification in August, September, or October. This extension reduced the burden on storm-impacted households and on HHSC staff who were also operating a D-SNAP program. HHSC should continue to seek this waiver from FNS in the future when disasters happen.

Current SNAP recipients should receive supplemental benefits to bring them up to the maximum allotment.

Under the D-SNAP program, recipients receive benefits equal to the maximum allotment for the regular SNAP program for a given household size. Setting benefits at the maximum amount recognizes the extra burden that most people impacted by disasters face as they recover. Because recipients of regular SNAP benefits are in the same situation and to achieve parity between the programs, current SNAP recipients should receive automatic supplemental benefits after a disaster.

The requirement that SNAP recipients who lost food in a disaster must complete a Form H1855 should be eliminated.

SNAP recipients who have had food purchased with SNAP benefits destroyed typically must complete a Form H1855 in person at a local office to request replacement benefits. The form must be completed within 10 days of the incident.

After Harvey, HHSC issue automatic, mass replacement benefit for the month of August to all recipients in counties that were part of the disaster declaration. This approach meant that SNAP recipients impacted by Harvey had lost food replaced without requiring tens of thousands of recipients to appear in person to complete forms at a time when hundreds of thousands more people were applying for D-SNAP. In the future, the requirement that recipients complete a Form H1855 to receive replacement benefits should be suspended as soon as a D-SNAP program is implemented.

The variety of products allowed to be purchased under the Women, Infants, and Children Program (WIC) program should be expanded because of potentially limited supplies of these products in stores.

WIC benefits can be used to purchase very specific types, brands, and sizes of foods. However, after a disaster, certain packages of food may be difficult to find because closed roads, limited fuel supplies, and lack of electricity can hinder supply lines. After Hurricane Harvey, FNS approved HHSC’s request to allow WIC recipients to substitute different varieties of eggs, bread, and milk because of limited availability of the normal types and sizes of these products. After a major disaster, HHSC should anticipate the supply lines that will most likely be disrupted and should request this same waiver in the future.

Schools in impacted areas should be able to provide meals to any student for a period of time after a disaster under the National School Lunch Program and the School Breakfast Program.

The National School Lunch Program and School Breakfast Program provide free and reduced-price meals to children from low-income households. After Hurricane Harvey, the Texas Department of Agriculture (TDA) requested and was approved for a waiver to allow schools in the impacted areas to serve free meals to all students for the entire month of September with no requirement to individually certify students’ eligibility. This waiver meant that students in 22 counties could receive meals at school if needed without having to go through the normal application process. In future disasters, the Texas Department of Agriculture should request the same waiver from the USDA’s Food and Nutrition Services.

Flexibility in the federal meal pattern, the requirements that govern the nutritional makeup of school meals, should be provided.

Federal regulations set requirements for meals provided through school nutrition programs that require certain types of nutritious foods to be provided and that limit the amount of unhealthy foods in meals. Because of disruptions to normal supply chains, disasters can make it difficult for schools to meet the federal meal pattern requirements. Waivers from the pattern mean that schools can continue to provide nutritious meals even if one component is incomplete. Schools in 22 counties in Texas received waivers from the federal meal pattern requirements after Hurricane Harvey for two months. Schools in the hardest areas had these waivers extended into 2018. A request for these waivers should be made after future disasters.
Recommended Policies for Future Disasters

Texans should be able to pre-register for D-SNAP to expedite registration if a disaster occurs.

In recent years, Louisiana and Florida have developed programs that allow people to pre-register for D-SNAP. In Louisiana, residents can pre-register at any time while Florida opens the pre-registration system only when a disaster has occurred.

Pre-registration can significantly reduce waiting times at in-person application sites. When implemented as Louisiana has, it also allows people to gather important information under normal conditions as opposed to after a disaster.

Implementing a pre-registration system would be a significant project for HHSC. However, Texas is at risk from multiple hazards that could trigger the need for D-SNAP. In fact, the State of Texas Hazard Mitigation Plan, 2013 Update ranks the risk from floods as “High Likely: Event probable in next year” and hurricanes/tropical storms, wildfires, and tornadoes as “Likely: Event probable in next 3 years.” Given the risks to Texas from hazards, HHSC should begin creating a pre-registration for D-SNAP to get needed nutrition assistance to Texans impacted by disasters as quickly as possible in the future.

The application period for D-SNAP should be 30 days long.

After Hurricane Harvey, the application period in 36 of 39 counties was seven days long. During that period, applicants and staff had to deal with high demand, long lines, and days designated for applicants by last name. By the end of October, 1.7 million Texans had applied for D-SNAP. The high demand for food assistance combined with the short application period meant that people waited in line for hours to apply. In fact, in Houston at one point, people reported waiting in their cars in traffic for one to three hours just to be able to park in order to get in the line to apply for D-SNAP. Adding to the burden, because applicants were only able to apply on certain days based on the first letter of their last name, in most cases people actually had only three days available to them to apply.

After a disaster, people may be displaced from their homes, have reduced access to transportation, and may have numerous storm-related tasks that they are attending to. To reduce long lines at application centers and reduce the burden on people who have been impacted by the disaster, HHSC should make the application period for D-SNAP 30 days in the future.

Potential D-SNAP application sites should be identified in advances and MOUs should be developed.

Once a D-SNAP program is approved by FNS, it is possible to open application sites quickly if state and local officials are prepared. One key component to preparedness is identifying appropriate facilities in advance and entering into MOUs with the entity in charge of the facility about using it as a D-SNAP application site. HHSC should work with county officials on these issues during a time when no disasters threaten and plan an annual or bi-annual review.

The D-SNAP benefits period should be more than one month for major disasters.

D-SNAP benefits typically last for one month. However, states can seek federal approval to extend the benefit period. In fact, after Hurricane Harvey D-SNAP recipients received two months’ worth of benefits. Benefits were also available for two months after the flooding in South Louisiana in 2016. These extensions recognized the reality that individuals and families in disaster zones frequently face hardships for months as they and their communities recover and rebuild.

D-SNAP is a critical component of recovering from a disaster because it not only provides nutritional food to recipients, but it also helps them devote more household resources to other aspects of recovery including home and automobile repairs. In disasters that cause significant damage to the housing stock and displace people for long periods of time, HHSC should request a longer benefit period as early as possible so that people can make plans for their recovery.

---

4 In two counties, extra days were added to the application period because lines were so long during the application period. In the final county, extra days were added because the original application period was less than seven days.
D-SNAP should be available to people employed in the impacted area in addition to people residing there. Disasters impact not only residents of an area but also employers in the area. When businesses are temporarily closed because of damage, transportation problems, or lack of electricity, workers lose wages. HHSC should approve D-SNAP benefits for workers who have suffered economic loss due to a disaster regardless of the county in which they live and indicate this in the request to FNS.

All food banks should be deputized to process D-SNAP applications following the current Community Partner Interviewing model.

Currently, five food banks in Texas are approved to conduct SNAP interviews under a waiver from FNS. Two more food banks have the ability to issue SNAP EBT cards. All network food banks should be deputized to process D-SNAP applications in an effort to increase capacity after a disaster. Food banks can deploy staff to shelters to process applications, and they can train volunteers and AmeriCorps*VISTA members to assist with the process.

Impacted residents should be able to apply for D-SNAP online.

Current D-SNAP procedures require applicants to travel to a limited number of locations (often only one per county) and wait in line (frequently for hours) on a limited number of days. This system can place a significant burden on people who have just experienced a disaster. Online application would reduce travel and wait times for applicants and allow them to apply at a date and time that is convenient. Because Texas already allows online application for SNAP benefits, it should implement the same option for D-SNAP.

Evacuees in shelters should be first priority for enrollment in D-SNAP.

Evacuees living in shelters are the people who were likely most impacted by the disaster and will likely need the most assistance to recover fully. When a D-SNAP program is implemented, HHSC should prioritize these people as they make decisions about the aspects of the program directly in their control. HHSC should also emphasize the importance of serving evacuees in shelters to other parties involved in administration, such as county judges.

Food banks should be allowed to provide assistance to D-SNAP applicants via call centers in the event that shelter staff are overwhelmed.

After a D-SNAP program is approved, the administering agencies face a challenge in getting important information out to as many eligible people as possible as well as correcting misinformation that may have been mistakenly shared by other sources. Food bank staff who are knowledgeable about D-SNAP can help reduce the burden on agency staff and can make sure that the correct information gets to peoples as quickly as possible. HHSC should allow D-SNAP applicants to enroll via food bank call centers so that food bank staffers’ expertise can be used to increase capacity quickly after a disaster.

A process for enrolling impacted residents who are eligible for SNAP upon exhaustion of D-SNAP benefits should be developed.

Many impacted residents who receive D-SNAP benefits may remain food insecure after their D-SNAP benefits are exhausted. HHSC should develop a process for identifying those D-SNAP recipients who may be eligible for SNAP, outreaching those households, and enrolling them in SNAP. Food bank staff who are trained to help with the SNAP application process can be deployed to assist in outreaching and assisting former D-SNAP recipients with the enrollment process.
The work requirements should be temporarily lifted for all adult recipients of SNAP.

Able-bodied adults without dependents who receive SNAP benefits are required to meet certain work requirements. This group represents a very small proportion of all SNAP recipients, and the majority of them work at some point during the year before or after the month in which they receive benefits. However, meeting the work requirements can be particularly difficult after a disaster even for adults who were working at the time of the storm. Employers may be closed for a period of time, and those that are open may have reduced hours, resulting in fewer shifts for workers.

States can request waivers from work requirements during times of high unemployment. Because of instability in local labor markets after disasters and because only a small percentage of SNAP recipients are impacted by the work requirements, HHSC should request these waivers after disasters.

Verification requirements for SNAP should be reduced.

When applying for SNAP benefits for the first time, applicants must provide documentation to verify eligibility based on many factors, including financial resources, earned income, medical expenses, and child care expenses. Households that are applying for SNAP benefits for the first time following a disaster are likely those who have been most significantly impacted. They may have a difficult time gathering all of the required documentation in a timely manner. Because SNAP provides critical nutrition assistance to families, verification requirements should be reduced to allow these families to begin receiving and using their benefits as quickly as possible.

Encourage TDA to establish a threshold above which it begins the process to request the release of TEFAP and other USDA foods for household distribution.

TDA is responsible for submitting a request to FNS to release USDA foods for use in a disaster household distribution program. TDA can establish internal policies to help speed up the process of determining whether to submit a request for release of USDA foods for household distribution. A threshold should be determined that provides a clear trigger for TDA to begin preparing a waiver request because food insecurity is increasing after a disaster. This threshold can be defined as a food bank in or near a disaster area distributing a certain amount of food above its normal level (calculated a percentage of average daily distribution).

Once this threshold is reached, TDA can quickly begin preparing a waiver request as well as begin collecting needed information about what types and how much food is needed to speed up the process of releasing TEFAP and other USDA foods.

43 MILLION POUNDS of FOOD and SUPPLIES distributed after the storm via the Feeding Texas network

43 MILLION POUNDS weighs as much as one and a half Brooklyn Bridges

Shelters Partner Agencies Mobile Pantries Food Banks Parking Lots
Emergency Preparedness
Memorandum of Understanding

Between __________________________ <Food Bank>
and __________________________ <Local Organization>

Purpose
______________________________ (the “Food Bank”) and ________________________________
enter into this Memorandum of Understanding (MOU) to facilitate cooperation before, during, and after
a disaster in the area of feeding operations.

Definition of a Disaster
A disaster is an occurrence such as a hurricane, tornado, storm, flood, high water, wind-driven water,
tidal wave, earthquake, volcanic eruption, drought, blizzard, pestilence, famine, fire, explosion, building
collapse, transportation wreck, or other situation that causes human suffering or creates human needs
that the victims cannot alleviate without assistance.

Responsibilities
The parties agree to the following:

1. Each party to this MOU is a separate and independent organization. As such, each organization
   retains its own identity in providing service, and each organization is responsible for establishing its own
   policies and financing its own activities.

2. The Food Bank’s primary responsibilities will be to

   a. Provide food items during a disaster as requested:

      • Pre-disaster:
        o Snacks and water to emergency shelters

      • During and Post disaster:
        o Ready to eat food items (without cooking) such as pop top cans, snacks, peanut
          butter, sausages and other items
        o Drinks
        o Cleaning supplies
        o Family Boxes – filled with specifically requested items
        o Random Family Boxes – comprised of available donated items that have been sorted
        o Feeding America category boxes
        o Upon request and when supplies are available, food will be provided to emergency
          kitchens, such as those operated by the ARC, Salvation Army, Texas Baptist Men
          and others.

   b. Maintain a current record of food available and be able to identify how much of that product is
      federal food or otherwise subject to restrictions.
3. The ___________________________ <Local Organization> will

a. Provide written documentation of requests made of the Food Bank at the time of the request where possible or in a timely manner otherwise to help the Food Bank with documentation and reimbursement requests.

b. Keep the public informed of the cooperative efforts between ___________________________ <Local Organization> and the Food Bank.

Term of MOU
This MOU shall be effective on _____________ and terminate on _______________. Six months prior to termination, the parties shall meet to review the progress and success of the MOU and determine whether to extend it.

Modifications
This MOU may be modified or amended only by an instrument in writing signed by the parties hereto.

Termination
Both parties understand that at any time this MOU may be terminated by written notification from either party to the other.

Miscellaneous
This MOU does not create a partnership or a joint venture, and neither party has the authority to bind the other.

Effective Date and Execution
This MOU becomes effective upon execution of the signatures of all parties to the MOU. The date of execution shall be the date of the last signature.

In Witness Thereof, the signing parties have caused this agreement to be executed by and between them.

__________________________________    ______________
Executive Director       Date

__________________________________    ______________
Executive Director       Date
APPENDIX D: GENERAL EMERGENCY MANAGEMENT PROCESS IN TEXAS

RESOURCE REQUEST PROCESS IN TEXAS
Adapted from presentation by the Texas Division of Emergency Management Preparedness Section, Plans Team

LOCAL JURISDICTIONS

Counties and cities are the first entities to respond to a disaster. When possible, they should use their own resources to respond.

When local resources are not enough, local officials – county judges, mayors, and emergency management coordinators – may contact the Disaster District Committee that serves their area.

DISASTER DISTRICT COMMITTEES (DDC)

DDCs are composed of representatives from the state agencies that sit at the State Emergency Management Council. They have resources to assist local jurisdictions respond to a disaster.

If a DDC cannot fill a request from a local jurisdiction, it passes the request to the State Operations Center.

STATE EMERGENCY MANAGEMENT COUNCIL

The Emergency Management Council consists of representatives from over two dozen state agencies and major NGOs involved in disaster response. The Texas Department of Agriculture and the Texas Health and Human Services Commission have representation on the Council.

If the Council does not have the resources to fulfill a request, they will ask the federal government for help through the Governor’s Office.
The following list identifies the actions that Feeding Texas should be prepared to undertake in the event of a disaster that affects one or more member food banks.

<table>
<thead>
<tr>
<th>ACTION</th>
<th>PERSON RESPONSIBLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alert Feeding Texas network that a disaster has occurred that impacts at least one network food bank</td>
<td>CEO</td>
</tr>
<tr>
<td>Make immediate contact with TDA to determine what the agency is planning in terms of waiver requests</td>
<td>CEO</td>
</tr>
<tr>
<td>Update Feeding Texas website with information about the disaster</td>
<td>Communications manager</td>
</tr>
<tr>
<td>Update and release Feeding Texas media messaging</td>
<td>Communications manager</td>
</tr>
<tr>
<td>Update and release Feeding Texas social media messaging</td>
<td>Communications manager</td>
</tr>
<tr>
<td>Monitor product needed by affected food bank(s) (at least daily during initial phase)</td>
<td>Disaster logistics coordinator</td>
</tr>
<tr>
<td>Monitor staffing and equipment needs of affected food bank(s) at frequently and regular intervals</td>
<td>Disaster logistics coordinator</td>
</tr>
<tr>
<td>Monitor and document activities of food bank(s) acting in a supporting role</td>
<td>Disaster logistics coordinator</td>
</tr>
<tr>
<td>Take the lead in making sure donated product is directed where appropriate</td>
<td>Disaster logistics coordinator</td>
</tr>
<tr>
<td>Track monetary donations to Feeding as they come in</td>
<td>CFO</td>
</tr>
<tr>
<td>Track disaster-related operating expenses (e.g., overtime) incurred by Feeding Texas</td>
<td>CFO</td>
</tr>
</tbody>
</table>
21 FOOD BANKS serving the greater state of Texas.

3,000 local partners serving all 254 counties.

MISSION shared by all.

Food Bank of West Central Texas
Abilene

High Plains Food Bank
Amarillo

Central Texas Food Bank
Austin

Southeast Texas Food Bank
Beaumont

Brazos Valley Food Bank
Bryan

Montgomery County Food Bank
Conroe

Food Bank of Corpus Christi
Corpus Christi

North Texas Food Bank
Dallas

El Pasoans Fighting Hunger Food Bank
El Paso

Tarrant Area Food Bank
Fort Worth

Houston Food Bank
Houston

South Texas Food Bank
Laredo

South Plains Food Bank
Lubbock

Food Bank of the Rio Grande Valley
Pharr

West Texas Food Bank
Odessa

Concho Valley Regional Food Bank
San Angelo

San Antonio Food Bank
San Antonio

Galveston County Food Bank
Texas City

East Texas Food Bank
Tyler

Food Bank of the Golden Crescent
Victoria

Wichita Falls Area Food Bank
Wichita Falls

Indicates Shared County