

Appendix - A

**Analysis of FEMA Flood Aid Registrations Used to Support the
State's Disaster Damage Assessment
(Data as of 11-3-2015)**

	County	Population by County*	FEMA Registrations	% of FEMA Registrations to the Population
1	Williamsburg County	32,535	5,086	15.632%
2	Clarendon County	33,775	3,379	10.004%
3	Lee County	17,896	1,658	9.265%
4	Sumter County	107,480	8,624	8.024%
5	Georgetown County	61,298	3,653	5.959%
6	Orangeburg County	89,208	4,796	5.376%
7	Calhoun County	14,781	640	4.330%
8	Richland County	407,051	16,051	3.943%
9	Florence County	138,900	4,524	3.257%
10	Colleton County	37,731	1,183	3.135%
11	Darlington County	67,548	1,421	2.104%
12	Dorchester County	152,478	2,843	1.865%
13	Berkeley County	202,786	3,693	1.821%
14	Charleston County	389,262	6,838	1.757%
15	Kershaw County	63,603	1,110	1.745%
16	Bamberg County	14,880	209	1.405%
17	Horry County	309,199	4,147	1.341%
18	Lexington County	281,833	3,666	1.301%
19	Fairfield County	22,747	242	1.064%
20	Marion County	31,747	314	0.989%
21	Newberry County	38,012	281	0.739%
22	Greenwood County	69,838	238	0.341%
23	Saluda County	20,053	31	0.155%
24	Dillon County	31,234	45	0.144%
25	Laurens County	66,623	75	0.113%
26	Abbeville County	24,932	18	0.072%
27	Hampton County	20,049	13	0.065%
28	Barnwell County	21,725	13	0.060%
29	Marlboro County	27,494	14	0.051%
30	McCormick County	9,706	4	0.041%
31	Chesterfield County	46,017	15	0.033%
32	Union County	27,777	9	0.032%
33	Edgefield County	26,514	7	0.026%
34	Aiken County	165,829	41	0.025%
35	Allendale County	9,433	2	0.021%
36	Spartanburg County	297,302	62	0.021%
37	Greenville County	491,863	65	0.013%
38	Lancaster County	85,842	9	0.010%
39	Cherokee County	56,194	5	0.009%
40	Anderson County	194,692	17	0.009%
41	Pickens County	121,691	10	0.008%
42	Chester County	32,267	2	0.006%
43	Beaufort County	179,589	11	0.006%
44	Jasper County	27,824	1	0.004%
45	York County	251,195	4	0.002%
46	Oconee County	75,713	0	0.000%
		4,896,146	75,069	1.533%

The twenty four counties highlighted were approved to receive D-SNAP benefits for low income households.

*Source: United States Census Bureau / "Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2015".
http://www.southcarolina-demographics.com/counties_by_population

Appendix - B

Appendix - C

United States Department of Agriculture
South Carolina Department of Social Services
**DISASTER SNAP
AFFIDAVIT OF LOSS**

Case Name: _____ Case Number: _____

Household Address: _____

City/State/Zip Code: _____

I hereby certify under penalty of perjury that my household experienced one or more of the adverse effects below as a result of 2015 Flood

that occurred in my county of residence during the period of October 3, 2015 through November 2, 2015.

- Loss of Income
- Inaccessible Liquid Resources
- Out-of-Pocket, unreimbursed disaster-related expenses

Recipient's Signature: _____ Date: _____

FOR DSS USE ONLY

Approved for Benefits

Denied for Benefits

Household Size: _____

Reason: _____

If approved:

1. Max allotment for household size \$ _____.

2. Amount of SNAP benefits received during disaster month(s) \$ _____.

DSNAP Supplement Amount: (Balance of 1 – 2) \$ _____

Worker's Signature: _____ Date: _____

Appendix - D

United States Department of Agriculture South Carolina Department of Social Services APPLICATION FOR DISASTER SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (DSNAP) (Pursuant to 7 CFR 280)		Application Date: _____				
		County: _____				
All applications will be considered without regard to age, color, race, sex, disability, religion, national origin or political belief.		Disaster Authorization Period: Begin: _____ End: _____				
PART A – HOUSEHOLD SITUATION (Please check all that apply below)						
1a. Are you currently a Supplemental Nutrition Assistance Program (SNAP) recipient? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, in what county: _____						
1b. Have you applied for or received DSNAP benefits already during this disaster? <input type="checkbox"/> Yes <input type="checkbox"/> No						
2a. Was your household living in the disaster area at the time of the disaster? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, answer the following questions:						
1. Did the disaster damage or destroy your home or self-employment property? <input type="checkbox"/> Yes <input type="checkbox"/> No						
2. Does your household have any additional expenses as a result of the disaster? <input type="checkbox"/> Yes <input type="checkbox"/> No						
3. Does your household plan to buy food before { _____ }? <input type="checkbox"/> Yes <input type="checkbox"/> No						
4. Did the disaster delay, reduce or stop your household's income? <input type="checkbox"/> Yes <input type="checkbox"/> No						
5. Does your household have any cash or money in checking or savings accounts which you cannot get because the bank/credit union/business is closed due to the disaster? <input type="checkbox"/> Yes <input type="checkbox"/> No						
PART B – HOUSEHOLD ADDRESS						
Permanent Home Address:		City:	State	Zip Code	Telephone	Verified <input type="checkbox"/>
Temporary Home Address:		City:	State	Zip Code	Telephone	
PART C – HOUSEHOLD MEMBERS				PART D - INCOME		
Name (Last, First, Middle)		Birth Date MM/DD/YY	Social Security No.	Source	Monthly Amount	
1. (Head of Household) Verified <input type="checkbox"/>						
2.						
3.						
4.						
5.						
6.						
If more than 6 household members, use DSS Form 3456 A.					TOTAL INCOME	
PART E – RESOURCES		Amount	PART G – ELIGIBILITY/BENEFIT COMPUTATION			
Cash on Hand			1. Income from Part D \$ _____ 2. Resources from Part E \$ _____ 3. Total (1 + 2) \$ _____ 4. Expenses from Part F \$ _____ 5. Adjusted Income (3 – 4) \$ _____ (If 4 greater than 3, enter 0)			
Checking Accounts						
Savings Accounts						
Other Available Resources						
TOTAL RESOURCES						
PART F – EXPENSES		Amount	Compare adjusted income to disaster income limits for the appropriate household size to determine eligibility and benefit amount. <input type="checkbox"/> Approved <input type="checkbox"/> Denied Date: _____			
Cost to Repair or Replace Items For Home or Self-Employment Property						
Dependent Care Expenses Due to Disaster						
Funeral/Medical Expenses Due to Disaster						
Moving and Storage Expenses Due to Disaster						
Temporary Shelter Expenses						
Expenses to Protect Property During Disaster						
Other Disaster Related Expenses						
TOTAL EXPENSES			Household Size:		Allotment Amt:	
PART H – CERTIFICATION AND SIGNATURE						
I understand the questions on this application and the penalties for hiding or giving false information. My household is in need of immediate food assistance as a result of the disaster. I certify, under penalty of perjury, that the information I have given is correct and complete to the best of my knowledge. I also authorize the release of any information necessary to determine the correctness of my certification. I certify that I have read the penalty warnings that were given to me. I understand that if I disagree with any action taken on my case, I have the right to request a fair hearing, orally or in writing.						
Signature of Applicant, Authorized Representative or Witness:				Worker Signature:		
Affix EBT Card Bar Code Label Here:						

Appendix - E

Disaster Guidance Attachment

Disaster Supplemental Nutrition Assistance Program Income Eligibility Standards and Allotments October 1, 2015 – September 30, 2016

48 States and DC

Household Size	Disaster Gross Income Limit ¹	Maximum Allotment
1	\$1640	\$194
2	\$1987	\$357
3	\$2334	\$511
4	\$2693	\$649
5	\$3069	\$771
6	\$3445	\$925
7	\$3791	\$1022
8	\$4138	\$1169
Each Additional Member	+\$347	+\$146

Alaska

Household Size	Disaster Gross Income Limit ¹	Maximum Allotment		
		Urban	Rural 1	Rural 2
1	\$2297	237	302	368
2	\$2730	435	554	675
3	\$3164	622	794	966
4	\$3597	790	1008	1227
5	\$4030	939	1197	1457
6	\$4481	1127	1437	1749
7	\$4914	1245	1588	1933
8	\$5347	1423	1815	2209
Each Additional Member	+\$434	178	227	276

¹ These figures include all necessary calculations. For example, for a 1-person household in the 48 States and DC, the maximum net monthly income = \$981; standard deduction = \$155; maximum shelter deduction = \$504. $\$981 + \$155 + \$504 = \1640 .

Hawaii

Household Size	Disaster Gross Income Limit ¹	Maximum Allotment
1	\$2028	343
2	\$2426	630
3	\$2824	902
4	\$3223	1146
5	\$3628	1361
6	\$4059	1633
7	\$4458	1805
8	\$4856	2063
Each Additional Member	+\$399	258

Guam

Household Size	Disaster Gross Income Limit ¹	Maximum Allotment
1	\$1885	\$287
2	\$2232	\$526
3	\$2579	\$753
4	\$2949	\$957
5	\$3354	\$1136
6	\$3758	\$1364
7	\$4104	\$1507
8	\$4451	\$1723
Each Additional Member	+\$347	+\$215

Virgin Islands

Household Size	Disaster Gross Income Limit ¹	Maximum Allotment
1	\$1515	\$250
2	\$1862	\$459
3	\$2211	\$657
4	\$2586	\$835
5	\$2962	\$991
6	\$3338	\$1189
7	\$3684	\$1315
8	\$4031	\$1503
Each Additional Member	+\$347	+\$188

Appendix - F

DISASTER SNAP PROGRAM

In the Fall of 2015, the South Carolina Department of Social Services (DSS) operated a Disaster Supplemental Nutrition Assistance Program (DSNAP) in each of the 24 counties declared eligible for individual assistance in the October 2015 Presidential Disaster Declaration.

DSNAP is intentionally designed as a disaster response program, allowing states to (quickly) offer short-term food assistance to families that have been impacted by a natural disaster.

The United States Department of Agriculture’s Food and Nutrition Service (FNS) funds 100 percent of the benefits issued in a DSNAP program and reimburses a state for 50 percent of the administrative costs of operating a DSNAP.

To be eligible for a DSNAP benefit, an applicant household must meet three basic criteria:

1. Reside in a disaster area.
2. Purchase or plan to purchase food during the disaster period.
3. Experience an adverse effect due to the disaster. This includes unreimbursed disaster-related expenses, unreimbursed loss of income, and inaccessible liquid resources.

FNS designed the DSNAP certification process to be “vastly streamlined,” and the requirements for an individual to receive DSNAP are significantly less stringent than for regular SNAP benefits. For example, verification of disaster-related expenses or loss is not required by FNS. States are advised to obtain verification “where possible.”

Individuals who receive regular SNAP benefits are not eligible for DSNAP.

DSNAP is a one-time payment equal to the maximum monthly allotment for the household size provided under regular SNAP. DSNAP benefit allotments are established by FNS.

As of January 11, 2016, DSS approved 179,102 of the 209,927 DSNAP applications taken, for a statewide approval rate of 85 percent.¹

The number of DSNAP applications received and approval rates vary by county, depending on the amount of flooding and the population. Approval rates ranged from 94 percent in Lee County, to 70 percent in Greenwood County.

- Richland County had the highest number of DSNAP applications received (31,264) and an approval rate of 85 percent.
- Newberry County had the fewest number of DSNAP applications received, at 615. 89 percent of the applications were approved.
- Of the 28,328 applications received in Charleston County, 84 percent were approved.
- In Greenville County, 12,772 applications were received and the approval rate was 81 percent.
- Spartanburg County received 9,393 DSNAP applications and approved 75 percent of them.

South Carolina’s approval rates are consistent with other states who have operated a DSNAP program:

DSNAP Approval Rates for Flood-Related Disasters, 2013 to 2015 (Source: FNS)

State	Application Period	Disaster Type	DSNAP Approval Rate
Maryland	January 2013	Flooding	85%
Illinois	June 2013	Flooding	90%
Colorado	September 2013	Flooding	85%
Arkansas	May 2014	Flooding/Tornadoes	99%
South Carolina	October 2015	Flooding	85%

¹ The sample size for the post-implementation case review was based on the total DSNAP applications approved as of January 11, 2016. The final report submitted to FNS on April 8, 2016, indicates 179,588 DSNAP approvals, increasing the approval rate from 85.3% to 85.5%.

DSNAP POST REVIEW

FNS requires states to complete a post-implementation Quality Control (QC) review of DSNAP. This review includes a random sample review of no more than 500 cases, and is focused on whether the agency followed procedure. FNS does not require states to review or audit recipient fraud.

In an effort to ensure program integrity, the Department conducted a post-DSNAP case review of approximately five percent of the approved DSNAP applications (9,029 cases).

To determine the number of DSNAP applications to be reviewed from each county, DSS developed a methodology that takes into account the DSNAP approval rate of all eligible households in a county and whether or not current SNAP recipients in a county automatically received a supplement or were required to file an affidavit.

The reason for the second criteria is that counties where current SNAP recipients had to file an affidavit to receive supplemental benefits suffered comparably less damage than other counties (e.g., Greenville and Greenwood). Therefore, incidences of fraud are likely to be higher in those counties that suffered less damage as a result of the historic flooding.

Cases were selected randomly according to the following methodology:

- **9 percent** of approved applications were reviewed from counties with a 75 percent approval rate of all eligible households. Marion is the only county that meets this criteria.
- **8.5 percent** of approved applications were reviewed from counties with a 40 – 74 percent approval rate of all eligible households (Orangeburg and Williamsburg) OR full affidavit counties (Bamberg, Greenwood, Greenville, Lee, and Spartanburg).
- **5 percent** of approved applications were reviewed from counties with a 31 – 39 percent approval rate of all eligible households. Clarendon, Darlington, Georgetown, Florence, and Sumter counties meet this criteria.
- **4.5 percent** of approved applications were reviewed from counties where: a) the DSNAP approval rate was less than 30 percent of all eligible households; and b) automatic supplements were issued to SNAP recipients in certain zip codes. Colleton, Dorchester, Fairfield, and Newberry counties meet this criteria.
- **3.5 percent** of approved applications were reviewed from counties where: a) the DSNAP approval rate was less than 25 percent of all eligible households; and b) automatic supplements were issued to SNAP recipients county-wide. Berkeley, Calhoun, Charleston, Horry, Kershaw, Lexington, and Richland counties meet this criteria.

Cases were randomly selected utilizing assistance from DSS IT to randomly select names corresponding to the number of cases needed for each county.

A breakdown of the number of cases reviewed by county is provided on page seven (7).

REVIEW RESULTS

Cases where the information indicated possible fraud or questionable information were referred for further investigation. 1,597 or 18 percent of the 9,029 DSNAP cases reviewed, were sent to DSS Benefit Integrity workers for a Phase II review. Of these 1,597 cases:

- 859 were classified as Unintentional Client Error (application had incorrect information, with no indication it was intentional)
- 51 were classified as Agency Error
- 297 were Intentional Program Violations, or “fraud”
- 390 were determined Unfounded (based on additional evidence gathered)

The number of cases referred for further review and possible claim establishment by county and outcome is provided in Table 1.

Table 1. Post-DSNAP Case Review, Phase II Reviews by Outcome

County	Unintentional Client Error	Agency Error	Intentional Program Violation	Unfounded	Total
Bamberg	1	1	2	1	5
Berkeley	55	4	6	16	81
Calhoun	1	1	2	0	4
Charleston	96	2	17	26	141
Clarendon	14	1	0	28	43
Colleton	7	2	2	7	18
Darlington	33	0	2	8	43
Dorchester	37	2	5	18	62
Fairfield	1	0	9	3	13
Florence	102	1	7	38	148
Georgetown	47	1	4	14	66
Greenville	73	2	68	50	193
Greenwood	3	0	5	6	14
Horry	48	2	4	25	79
Kershaw	7	4	7	6	24
Lee	20	0	0	7	27
Lexington	13	0	28	12	53
Marion	58	2	6	15	81
Newberry	0	1	0	0	1
Orangeburg	84	4	21	27	136
Richland	35	19	62	38	154
Spartanburg	49	1	37	20	107
Sumter	41	0	3	20	64
Williamsburg	34	1	0	5	40
Total	859	51	297	390	1,597

Inadvertent household errors, or “unintentional client error” claims are those resulting from a misunderstanding or unintended error on the part of a household who otherwise complies with program requirements. Of the 9,029 cases reviewed, 859 (9.5 percent) indicated client error.

The difference between an Unintentional Client Error and an Intentional Program Violation, or “fraud” is the ‘intent’ to lie or give incorrect information to the agency. For example:

A DSNAP recipient reported a job at Walmart on the DSNAP application but their income amount was not exactly correct. The agency cannot prove that the client ‘intentionally’ lied or gave false information. The recipient reported what they estimated their income to be for the month, and the federal program rules do not require applicants to provide proof of wages. Therefore, the claim would be an Unintentional Client Error.

However, if the recipient did not report the job at Walmart at all, this would be considered an intentional failure to give the agency correct information. Since DSS can prove the client was working at Walmart at the time he/she filed the DSNAP application, the claim would be an Intentional Program Violation.

297 cases, 3.2 percent of those reviewed, indicated an Intentional Program Violation, or “fraud”.

An agency error claim is an overpayment that occurs due to the fault of the agency. For example, a staff member entered the reported income or disaster expenses incorrectly into the formula, resulting in the applicant being approved when he/she was ineligible. An agency error could also be the result of misapplied policy. 51 cases (0.5 percent of those reviewed) indicated agency error.

CLAIMS ESTABLISHED

The Department has established overpayment claims on 1,207 of the DSNAP cases reviewed, totaling \$522,388. This represents 13 percent of the review sample.

- \$361,174 in overpayments resulting from unintentional client error (859 cases).
- \$19,159 in overpayments resulting from agency error (51 cases).
- \$142,055 in overpayments resulting from Intentional Program Violations, or “fraud” (297 cases).

Note: A small number of the IPV claims could change to either unintentional client error or unfounded in the next several months. If the DSNAP applicant does not admit/consent to the Intentional Program Violation, the agency requests an Administrative Disqualification Hearing for IPV claims, and the outcome is decided by an Administrative Hearings Officer. Typically, about 95 percent of Administrative Hearings decisions are rendered in favor of the agency.

Newberry County had only one case that resulted in a claim. Greenville County had the highest number of claims established, at 163, followed by Richland (116) and Charleston Counties (115).

Greenville and Richland Counties also had the highest numbers of Intentional Program Violations, at 68 and 62, respectively.

Counties with the highest numbers of unintentional client errors included Florence (102), Charleston (96), and Orangeburg (84).

Individual claim amounts range from \$122 to \$1,022. The average amount is \$433.

A breakdown of the number of claims established and total claim amounts by county is provided in Table 2.

The minimum threshold to prosecute a case for fraud in General Sessions' court is \$2,001. Cases falling below that threshold can be prosecuted in Magistrates court.

Table 2. Post-DSNAP Review, Claims Established by County and Claim Type

County	Unintentional Client Error (CL)	CL Claims Amount	Agency Error (AG)	AG Claims Amount	Intentional Program Violation (IPV)	IPV Claims Amount	Total Claims	Total Claims Amount
Bamberg	1	\$357	1	\$194	2	\$705	4	\$1,256
Berkeley	55	\$23,147	4	\$2,166	6	\$3,326	65	\$28,639
Calhoun	1	\$194	1	\$189	2	\$705	4	\$1,088
Charleston	96	\$37,237	2	\$388	17	\$7,169	115	\$44,794
Clarendon	14	\$5,678	1	\$194	0	\$0	15	\$5,872
Colleton	7	\$4,176	2	\$865	2	\$551	11	\$5,592
Darlington	33	\$15,068	0	\$0	2	\$867	35	\$15,935
Dorchester	37	\$17,611	2	\$1,022	5	\$2,222	44	\$20,855
Fairfield	1	\$511	0	\$0	9	\$3,650	10	\$4,161
Florence	102	\$43,085	1	\$357	7	\$3,796	110	\$47,238
Georgetown	47	\$20,541	1	\$194	4	\$2,536	52	\$23,271
Greenville	73	\$31,895	2	\$1,157	68	\$32,373	143	\$65,425
Greenwood	3	\$1,776	0	\$0	5	\$2,645	8	\$4,421
Horry	48	\$23,078	2	\$551	4	\$2,391	54	\$26,020
Kershaw	7	\$2,813	4	\$1,265	7	\$3,501	18	\$7,579
Lee	20	\$8,167	0	\$0	0	\$0	20	\$8,167
Lexington	13	\$4,835	0	\$0	28	\$13,965	41	\$18,800
Marion	58	\$21,840	2	\$609	6	\$2,220	66	\$24,669
Newberry	0	\$0	1	\$194	0	\$0	1	\$194
Orangeburg	84	\$31,633	4	\$1,385	21	\$10,386	109	\$43,404
Richland	35	\$12,137	19	\$6,896	62	\$29,987	116	\$49,020
Spartanburg	49	\$19,484	1	\$511	37	\$17,697	87	\$37,692
Sumter	41	\$19,642	0	\$0	3	\$1,363	44	\$21,005
Williamsburg	34	\$16,269	1	\$1,022	0	\$0	35	\$17,291
Total	859	\$361,174	51	\$19,159	297	\$142,055	1,207	\$522,388

FUNDS RECOUPMENT

DSS will use the same process for recouping DSNAP funds as it does with regular SNAP clients. If the review resulted in a claim being established, a DSS Benefit Integrity worker will contact the recipient to attempt to arrange a payment agreement.

1. If the client is currently receiving SNAP benefits, the amount owed for the DSNAP claim will be recouped from their current benefits.
2. If the client is not currently receiving SNAP benefits, they will have to pay the DSNAP claim in full or sign a repayment agreement.
3. If the client does not pay the overpayment in full or make arrangements to make monthly payments, the debt will be sent the Treasurer Offset Program (TOP) where the debt will be paid through tax intercept.

Unused benefits on a DSNAP card can be returned to pay the overpayment debt, and the agency receives a retention percentage for return of unspent DSNAP benefits.

As with SNAP claims collection, the agency will retain a certain percentage of DSNAP claims collected based on the classification of the claim. For unintentional client error (CL) claims, the agency retains 20 percent. For IPV/fraud (IPV) claims, 35 percent is retained by the agency.

The total amount DSS will retain (assuming 100 percent recoupment) from claims established as a result of the DSNAP Post Review is \$121,954.

APPENDIX A: NUMBER OF DSNAP CASES REVIEWED BY COUNTY

County	Total Applications Approved as of 1/11/16	% of Approvals to be Reviewed	Cases Reviewed
Bamberg	788	8.5%	67
Berkeley	12,004	3.5%	436
Calhoun	1,308	3.5%	46
Charleston	23,679	3.5%	829
Clarendon	2,694	5.0%	135
Colleton	2,245	4.5%	101
Darlington	5,843	5.0%	292
Dorchester	8,287	4.5%	373
Fairfield	1,728	4.5%	78
Florence	12,648	5.0%	635
Georgetown	5,445	5.0%	272
Greenville	10,291	8.5%	880
Greenwood	1,905	8.5%	162
Horry	15,685	3.5%	549
Kershaw	3,498	3.5%	122
Lee	2,531	8.5%	215
Lexington	6,305	3.5%	221
Marion	5,789	9.0%	521
Newberry	545	4.5%	25
Orangeburg	8,677	8.5%	738
Richland	26,686	3.5%	940
Spartanburg	7,023	8.5%	601
Sumter	10,167	5.0%	508
Williamsburg	3,331	8.5%	283
Total	179,102		9,029

Appendix - G

Start each call with:

Hello may I please speak to _____. If person not home, leave name and phone number on voicemail or give message to person answering the phone to have the individual call you back.

Once you get DSNAP applicant on the phone, let them know who you are and why you are calling (see below).

My name is Ms./Mr./Mrs. state last name and I am calling on behalf of the Department of Social Service. Your Disaster SNAP application was selected for review/audit therefore I need a few minutes of your time to go over the information you provided.

- Check to make sure applicant answered Part A correctly.
- 1a. Should be NO
- 1b. Should be NO
- 2a. Should be YES
- 2a 1-5, must answer YES to at least one of the following #s. #1, #2, #4, or #5.
- Review expenses with applicant to ensure consistent with what is on application.

- If social security numbers and dates of birth are not provided for anyone listed on the application, ask the applicant for that information.

- Check all SSN numbers to see if they received SNAP for October 2015

- Check all SSN numbers to see if they have any of the below hits:

Case Name: _____ Case or DSNAP number: _____

Source	Hit	No Hit	Comments
State wage data			
Unemployment			
Special benefit			
SDX/SSI			
Bendex/SS			
Work # (if needed)			

Were you able to contact client to complete review? Yes or No

Was a claim refer made? Yes or No

Part G- Eligibility/Benefit Computation.

- 1. Income from Part D \$ _____
- 2. Resources from Part E \$ _____
- 3. Total (1+ 2) \$ _____
- 4. Expenses from Part F \$ _____
- 5. Adjusted Income (3-4)
(if 4 greater than 3, enter 0) \$ _____

*If line 5 is zero, they are eligible

*If line 5 is not zero, compare the income to the disaster income limit chart for the appropriate household size to determine eligibility.

Disaster Income Chart.

Household Size	Disaster Gross Income Limit	Maximum Allotment
1	\$1,640	\$194
2	\$1,987	\$357
3	\$2,334	\$511
4	\$2,693	\$649
5	\$3,069	\$771
6	\$3,445	\$925
7	\$3,791	\$1022
8	\$4,138	\$1169
Each Additional Household Member	\$347	+\$146

Appendix - H



**United States
Department of
Agriculture**

August 31, 2016

**Food and
Nutrition
Service**

Southeast Region

**61 Forsyth St. S.W.
Room 8T36
Atlanta, GA
30303-3415**

Ms. Amber Gillum, Deputy State Director
Economic Services
South Carolina Department of Social Services
1535 Confederate Avenue, Room 629
P.O. Box 1520
Columbia, South Carolina 29202-1520

Dear Ms. Gillum:

We are in receipt of the Post Review Report and supporting documents for the Disaster Supplemental Nutrition Assistance Program (DSNAP) operated by South Carolina Department of Social Services (DSS) from October 3, 2015 through November 2, 2015.

Your reports confirm that South Carolina DSS successfully operated DSNAP in the 24 counties affected by severe flooding resulting from Hurricane Joaquin and declared eligible for individual assistance in the October 2015 Presidential Disaster Declaration. South Carolina DSS operated the program effectively, within the guidelines of your State's DSNAP Plan, and in accordance with the approved waivers.

This letter will serve as closure of the South Carolina DSS Disaster Supplemental Nutrition Assistance Program.

If you have any questions, please contact Regional DSNAP Coordinator, David Noble, at John.Noble@fns.usda.gov or (678) 704-2018.

Sincerely,

PEGGY FOUTS
Regional Director
Supplemental Nutrition Assistance Program

cc: Eugene Malveaux
Karama Bailey
Darise Graham
David Noble

File Code: FNS 16 DSNAP Closure Letter SC 2016

Appendix – I

South Carolina Department of Social Services

DSNAP PUBLIC AND DSS EMPLOYEE CASES REVIEWED: INTENTIONAL PROGRAM VIOLATION (IPV) CATEGORIES

An Intentional Program Violation, or “fraud” indicates that an individual intentionally provides false or misleading information in order to receive a benefit.

The Department conducted a post-DSNAP case review of approximately five percent of the approved DSNAP applications (9,029 cases). 297 cases, three percent of those reviewed, indicated an Intentional Program Violation, or “fraud”.

Non-Employee Cases Reviewed	
Reason for Claim	# of IPV Cases
One or more household members in open SNAP case and un-reported income	2
Benefit group (household) members reported incorrectly	3
Duplicate household member found	2
Duplicate household member found and income over the limit	1
Household received SNAP and DSNAP during the disaster period (duplicate participation)	12
Received DSNAP twice	1
Reported an incorrect social security number	1
Under-reported income	223
Under-reported income and income not reported for household member	30
Under-reported income and received SNAP and DSNAP during the disaster period	1
Under-reported income and household size reported incorrectly	1
Un-reported income	19
Un-reported income and received SNAP and DSNAP during the disaster period	1
Total	297

FNS requires states to complete a review of all DSNAP applications submitted by agency employees. DSS approved 259 DSNAP applications filed by agency employees, in 21 counties. Of these, 16 (six percent) indicated an Intentional Program Violation, or “fraud”.

DSS Employee Cases Reviewed	
Reason for Claim	# of IPV Cases
Falsified source of income (did not report job at DSS) and under-reported income	2
Falsified source of income (did not report job at DSS) and falsely stated loss of income	1
Falsely reported spouse’s loss of income	1
Under-reported income	1
Un-reported income	11
Total	16

Appendix - J

Concerns raised over flood food stamp applications



Tim Smith, tcsmith@greenvillenews.com
12:57 p.m. EST December 23, 2015

COLUMBIA — The number of South Carolinians approved for flood-related food stamp benefits is nearly double the number who have asked for federal flood aid.

According to figures provided to The Greenville News by the Federal Emergency Management Agency and the State Department of Social Services, the state has approved 184,173 applicants for one-time Disaster Supplemental Nutrition Assistance Program benefits in 24 counties, while a total of 96,132 people have registered in those same counties for flood aid from FEMA.

Lawmakers have raised questions about the apparent ease with which people have obtained the disaster food stamp benefits, particularly in areas that were not as hard hit by October's record rains. Some also have raised the possibility of fraud or of low-income residents being misled into thinking they could get the benefits just for living in a designated county.

In the Midlands, which suffered some of the most extensive flood damage, DSNAP approvals in Richland, Lexington and Sumter counties were about 1.3 times the number of FEMA flood aid registrations. In Greenville County, however, which saw comparatively little flood damaged, DSNAP approvals were more than 50 times the number of FEMA flood registrations. Just 200 in Greenville County applied for FEMA flood aid, but 12,741 applied for disaster food benefits and 10,926 were approved. In Spartanburg County, 200 registered with FEMA, but 9,389 applied for disaster food benefits and 7,471 were approved.

Karen Wingo, a spokeswoman for DSS, said that generally speaking, the difference is caused by more narrow requirements for FEMA aid. FEMA applicants, she said, must have had some flood-related damage to their property, while DSNAP applicants can qualify if they had flood damage, if they had lost income caused by the rains or had unreimbursed flood-related expenses.

However, some Greenville County lawmakers said they were "shocked" and "alarmed" at the large numbers of flood-related food stamp benefit applications taken in Greenville County, given what they saw as relatively minor damage in the area from the rains.

"It's a bit shocking to me," said Rep. Garry Smith, a Simpsonville Republican who sits on the House budget-writing committee. "We were very blessed that we did not get the kind of damage that other parts of the state did."

Sen. Mike Fair, a Greenville Republican and member of the Senate Finance Committee, said he also was surprised at the numbers and would like DSS to revisit the application process so that the system does not react too harshly next time because of some who may have taken advantage of the system this time.

“There’s a big difference between what happened in Columbia and in Spartanburg and having heavy rains, which we had,” he said. “I think maybe DSS needs to revisit the questionnaire and ask if they had any flood damage and what the damage was and if they had an estimate and who provided the estimate. Because those who really need it will have answers or get answers.”

According to DSS, some current food-stamp recipients in some areas of the state were given the difference between their benefits and the disaster benefits automatically. Wingo said federal officials approved giving supplements county-wide in 10 counties and in certain zip codes in another 10 counties. Those residents did not have to fill out applications. Greenville residents were not among those receiving the automatic supplements, she said.

The one-time benefits, paid for and regulated by the federal government, are based on the number in each household. A family of two, for instance, would receive \$357, while a household of three would receive \$511 and a household with five would get \$771.

For the 24 counties affected by flooding, DSS estimates it will issue a total of between \$75 million and \$80 million dollars in DSNAP benefits.

About 88 percent of applications received thus far have been approved. In Greenville County, that number was 85.7 percent.

According to DSS, residents in flood-affected counties could collect DSNAP benefits if there was damage to their residence, loss or inaccessibility of income related to the flood or unreimbursed flood-related expenses.

Applicants, according to DSS, were asked at the time of filling out the application to show proof of identity, address and income, as well as proof of unreimbursed expenses or lost income.

Each applicant was interviewed by a DSS worker, had to sign the application and was cautioned against providing false information.

“Furthermore, each individual who applied for benefits was given a brochure regarding food stamp fraud,” Wingo said. “And at every DSNAP site announcements were made throughout the day that alerted applicants to the criteria for receipt of benefits and advised individuals specifically that the benefits being provided were not “free food stamps” and individuals who obtained DSNAP benefits fraudulently would be subject to prosecution.”

Approved applicants were given debit cards on site that are loaded with funds within a week, she said.

She said under federal guidelines, up to 500 applications can be checked for compliance afterward. Some applications also might be flagged for review by DSS staff.

Wingo said the benefits integrity staff recently began checking some applications and that the agency is not aware of any criminal prosecutions related to the benefits.

The issue of fraud in the program was first raised last month during a Senate flood-relief hearing when one senator told the story of a Richland County man he said had subsequently bragged about getting benefits even though he was not in a flooded area.

Sen. Ross Turner, a Greenville Republican, told The News the program is a balance of getting disaster aid to victims without the normal red tape tied to benefits.

“When I hear 13,000 for Greenville County, it raises alarms for me,” he said. “I watched the river rise here but I sure didn’t think it was that bad here.”

He said the system is set up to help those hurt in a disaster.

“Unfortunately, not everybody operates in good faith,” he said.

Rep. Chandra Dillard, a Greenville Democrat, said she is glad those affected were able to get some financial relief.

“My concern is for people who may have gotten assistance who were not impacted by the flood, or were given the wrong information,” she said.

Dillard said she understands that it was easy to get assistance the first day of submitting applications in Greenville County.

“I’m not sure about the guidance given,” she said. “I don’t know if people thought, ‘Hey, I need to take advantage of this,’ not as in wrongdoing. There were a lot of people who showed up. We had a lot of water here in Greenville but nothing like the rest of the state. I’m concerned about the process and how it was presented to people.”

She said she also is concerned what will happen if reviews determine some of the applicants shouldn’t have received the money, saying that some would have difficulty repaying the funds.

Rep. Phyllis Henderson, a Greer Republican, said the numbers of Greenville County applicants surprised her.

“I’m not going to say nobody in Greenville was affected but it is a little surprising that there are people claiming they should be able to get benefits because of the flood,” she said.

She said it may be tough getting the money back from those who should not have received the benefits.

“I would think the best thing you can do is look at the procedure,” she said. “Put something in place so the next time we have some kind of natural disaster, at least you can say we have these extra safeguards in place.”

Sen. Thomas Alexander, a Walhalla Republican who chairs a Senate panel with oversight of DSS’ budget, said he is concerned about the numbers and magnitude of the program.

“I think the agency needs to do some accountability and report back to us,” he said.

Wingo said the numbers of DSNAP applications and approvals are still being finalized and are subject to change. The agency is expected to have final numbers, including the amounts of benefits issued, next month.

She said anyone aware of fraud involving the program can call the DSS fraud hotline at (800) 616-1309.