

From: Patel, Swati <SwatiPatel@gov.sc.gov>
To: Pisarik, HollyHollyPisarik@gov.sc.gov
Date: 10/16/2015 10:19:31 AM
Subject: Re: D-SNAP - Atty/Client Privileged

I'm fine with your recommendation if Josh and David are.

Sent from my iPhone

On Oct 15, 2015, at 10:38 PM, Pisarik, Holly <HollyPisarik@gov.sc.gov> wrote:

Swati,

The Governor needs to make a decision about the direction to head with D-SNAP based on what is allowed within the statute. She has to sign off on the application. My analysis is below:

Thus far, FEMA has declared 20 counties as disaster areas. In preparing its DSNAP application, DSS had two choices – allow folks that meet the criteria in any of the 20 counties to apply or only allow people in selected portions of the county (based on flooding data from EMD) to apply. DSS choose option 2 based on the Governor's guidance to "reasonably manage the scope." Here's how their application shakes out - 1) benefits for all who qualify in Calhoun, Charleston, Georgetown, Horry, Kershaw, Lexington, and Richland; 2) benefits for those that qualify in selected portions by zip code of the county for Berkeley, Clarendon, Colleton, Darlington, Dorchester, Florence, Lee, Newberry, Orangeburg, Sumter, and Williamsburg; and 3) no benefits available for residents in Bamberg and Greenwood. I've included DSS's rationale for these selections below and attached the data they used to arrive at these conclusions.

The decision point for us is whether to approve the "limited" application as written or ask them to expand the waiver for all that qualify in the 20 counties. Obviously, we will get push back in the counties where not all residents or no residents are eligible. The concern with allowing all in declared counties to apply is the process is basically "self-declaration," so while residents must meet income and "impact" criteria, they don't really have to prove it.

My recommendation is to ask them to submit an application so that anyone that meets eligibility criteria in the declared counties can apply. As you will see in DSS's explanation below, the data is very preliminary and people who may really have a need may have been carved out. Plus, it is very cumbersome to explain the rationale as to why some zip codes/counties were selected and others were not. And, based on the strong initial reaction when FEMA first announced the individual assistance eligible counties, I think she will get a lot of criticism for limiting the benefits. The feds pay for 100% of the benefits and 50% of the state cost for administering the program. But, I mostly think she should do it because it seems like the right thing to do. I would hate to carve out swaths of people from applying if they really need the benefit and otherwise would qualify but for DSS's determination of what areas to include.

Another consideration is that in most of these counties, DSS will be set up in the same location as FEMA. Doesn't FEMA require "proof," so there is at least some assurance that folks that are applying for FEMA benefits have had to produce something to apply.

DSS is anxious to submit the application and a number of folks have been asking about the status of DSNAP, so I think we need to make this decision quickly.

Thoughts? Josh and David may have more to add.

DSS's analysis below:

7 county-wide D-SNAPs (Calhoun, Charleston, Georgetown, Horry, Kershaw, Lexington, and Richland). These areas showed blue throughout the counties and in most cases, had higher numbers of FEMA registrants. Calhoun and Kershaw are the "outliers" in this category - both show significant flooding on the maps, but lower numbers of FEMA registrants.

11 partial D-SNAPs (selected zip codes in Berkeley, Clarendon, Colleton, Darlington, Dorchester, Florence, Lee, Newberry, Orangeburg, Sumter, and Williamsburg counties). These counties had certain zip codes with more blue/flooding areas on the maps and/or higher numbers of FEMA registrants. In areas where little or no blue appeared on the maps, we included any zip code with approximately 100 or more FEMA registrants. Newberry is the outlier in this category. While the maps show significant blue areas through a large section of eastern Newberry county, the number of FEMA registrants is relatively low.

Note: if you want to review each zip code in these counties, please let me know and I will make sure you have the final version.

The 2 counties we are proposing to exclude from the waiver at this point (though we have the option to amend once the assessments are closer to completion) are Bamberg and Greenwood. Neither the maps nor the FEMA registrant numbers indicate widespread damage at this point.

I will say that this is not an exact science. No one can produce any data at this time to definitively measure or pinpoint which areas of the state incurred actual damages as a result of the flooding, and which did not. This represents our best attempt to narrow the scope based on the information available as of this week.

From: Gillum, Amber [<mailto:Amber.Gillum@dss.sc.gov>]

Sent: Thursday, October 15, 2015 4:24 PM

To: Pisarik, Holly

Cc: Alford, Susan

Subject: D-SNAP

Holly,

Attached is the proposed D-SNAP implementation list. Of the 20 counties covered by the presidential declaration, the breakdown is:

7 county-wide D-SNAPs

18 partial D-SNAPs (delineated by zip code)

2 counties – no D-SNAP at this time. We can amend the waiver at a later date to include all or portions of these counties once the FEMA assessments are completed (or closer to completion).

Areas were identified using a combination of flood inundation maps and FEMA registrants by zip code (current as of yesterday). There were a number of areas where the # of FEMA registrants and the maps did not align (e. g., zip codes with relatively high numbers of FEMA registrants but little or no blue spots on the maps). Based on feedback from EMD, we erred in favor of the FEMA registrant list. I'm also attaching the flood maps and FEMA registrant list if you want to take a look.

The waiver is just about ready to go – if you have questions, or would like us to either add or delete a county or a zip code, please let me know so we can adjust the waiver application accordingly. I will not submit the application until I hear back from you.

Thanks,
Amber

Amber Gillum, Deputy State Director
South Carolina Department of Social Services
1535 Confederate Avenue, Columbia, SC 29201
Phone: 803-898-7474

Cell: 803-331-7350
Email: amber.gillum@dss.sc.gov

<Proposed D-SNAP Counties and Zip Codes.xlsx>

<Attachment B- Flood Maps.pdf>

<Attachment C- FEMA Applications by County.docx>