

**State Plan for Pandemic EBT  
Children in School and Child Care, 2021-2022**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

***Additional context and background for this document can be found at:***  
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

*The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660*

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2021-2022**

1. State **Oklahoma** \_\_\_\_\_:

2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);  
Continuing Appropriations Act, 2021 and Other Extensions Act;  
Consolidated Appropriations Act, 2021;  
American Rescue Plan Act of 2021

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment
  - for children in school
  - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households. **\$5,751,557**
  - Estimated amount issued to school children in non-SNAP households **\$19,255,214**
  - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households **14,688**
  - Estimated number of school children in non-SNAP households **49,172**
  - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
  - School children in SNAP households
  - School children in non-SNAP households
  - Children in child care
  
  - **Response: August 15, 2021 – May 30, 2022** ○ *For children in school Oklahoma will be using the average date of August 15, 2021 as the first day of the 21-22 school year as a simplified assumption.*

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

- *For calculating purposes there are 180 days of instruction per school year.*

- *The numbers available for benefits estimates are based on the 2020-2021 school year. An update will be submitted as more data becomes available.*

**4. P-EBT for School Children (see Q&As #6-24) A. Eligible Children**

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2021-2022, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application *and* the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
  
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 20202021 graduates and other non-students. *(Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.)* ***The Oklahoma State Department of Education (OSDE) is allowing each district a chance to review the data that was sent to OSDE from the district’s student information system provider through the near realtime collection process established in Oklahoma. This review will allow district staff an opportunity to ensure that each student’s Free and Reduced priced lunch status is accurate. The review will also allow districts to review the learning environment for each student. Finally, the review will allow districts to see individual absences and absences types. Oklahoma created a new absence type during the 19-20 SY for the purposes of collecting when students were learning in a virtual or distance learning environment for a short-term period, for COVID response. These codes, along with school calendar data (schools can annotate that a day or days are “virtual” days) allow OSDE to identify when***

*a student is participating in instructional activities in an “in-person”, a “blended or hybrid”, or a “virtual” environment. Once the data is verified and validated, the data is then used to calculate the number of days that a student participated in instructional activities but did not receive a meal due to not being on-site at a school that participates in the NSLP. This calculation is done on a day-by-day, student-by-student basis based on data sent and verified by school districts within the state.*

- ***\*\* The schools have been advised that if a student would like to complete an application for SY 21-22 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 20-21 and did not complete a F/R app for SY 21-22 the eligibility for SY 20-21 could be used for these benefits unless the school is offering in-person learning. This would not include seniors who graduated or no longer enrolled in the school in SY 20-21. The current year application supersedes the prior year’s data, if submitted. The process for parent-initiated applications will be achieved through an online form on the State Department of Education website called the parent benefit review form. The form will include a place for a parent signature or an acknowledgement that submission is considered a signature. Parent benefit review forms will include the following statement above the parent’s signature: “I certify (promise) that all information on this application is true and that the dates specified in my application are days that my child did not attend school in person for a school-approved COVID-related reason. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws.”***

***For private schools, DHS will request the information from the schools themselves. The accuracy of their eligibility determinations will be accomplished through the normal Administrative Review Process. That information will then be sent to DHS systems personnel using a spreadsheet. Said submission will be similar to the Direct Certification (DC) process that they are currently using.***

How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals<sup>2</sup>? Please describe separately for SNAP-recipient and non-SNAP recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year. ***The schools currently submit that information to the SDE on a regular basis as they determine the students F&R status at the school district. The OSDE only has the F&R data for public school children. OSDE will not be able to determine which students are SNAP recipients or non-SNAP recipients, DHS will have to determine that. If a child becomes eligible in the middle of the year and they are not a DC student, an application would have had to***

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<sup>2</sup> The burden associated with National School Lunch Program applications is covered under OMB Control # 05840026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

*be completed to determine the F & R status. However, schools have been advised that if a student would like to complete an application for SY 21-22 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 20-21 and did not*

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*complete a F/R app for SY 21-22 the eligibility for SY 20-21 could be used for these benefits unless the school is offering in person learning. This would not include seniors who graduated or no longer enrolled in the school in SY 20-21. In situations where no NSLP application were submitted in SY 20-21 or SY 21-22 P-EBT Eligibility will begin from the date of the NSLP application submission and not retroactively to the beginning of the school year.*

*Non-public schools will continue to rely on the schools themselves to make the eligibility determination.*

*DHS will be responsible for determining whether or not a student is a SNAP recipient by comparing data.*

*For OSDE, if a child becomes eligible in the middle of the year and they are not a DC student, an application will need to be completed to determine eligibility for the National School Lunch Program (NSLP). This would also hold true if a child transfers schools or is a new student attending a specific school in the middle of the school year. The process would be the same for students attending non-public schools. However, schools have been advised that if a student would like to complete an application for SY 21-22 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 20-21 and did not complete a F/R app for SY 21-22 the eligibility for SY 20-21 could be used for these benefits unless the school is offering in-person learning. This would not include seniors who graduated or no longer enrolled in the school in SY 20-21. The current year application supersedes the prior year's data, if submitted. In situations where no NSLP application were submitted in SY 20-21 or SY 21-22 P-EBT Eligibility will begin from the date of the NSLP application submission and not retroactively to the beginning of the school year.*

How will the State confirm each child's lack of access to meals at school? Please describe separately for children in public and non-public schools. *The Oklahoma State Department of Education (OSDE) is allowing each district a chance to review the data that was sent to OSDE from the district's student information system provider through the near real-time collection process established in Oklahoma. This review will allow district staff an opportunity to ensure that each student's Free and Reduced priced lunch status is accurate. The review will also allow districts to review*

*the learning environment for each student. Finally, the review will allow districts to see individual absences and absences types. Oklahoma created a new absence type during the 19-20 SY for the purposes of collecting when students were learning in a virtual or distance learning environment for a shortterm period, for COVID response. These codes, along with school calendar data (schools can annotate that a day or days are “virtual” days) allow OSDE to identify when a student is participating in instructional activities in an “in-person”, a "blended or hybrid", or a "virtual" environment. Once the data is verified and validated, the data is then used to calculate the number of days that a student participated in instructional activities but did not receive a meal due to not being on-site at a school that participates in the NSLP. This calculation is done on a dayby-day, student-by-student basis based on data sent and verified by school districts within the state. Only children attending NSLP-participating schools will be eligible for P-EBT benefits in SY 21-22.*

- Describe the process that the State will use to update and re-establish each child’s in person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.) *The district/school will establish this based on how their school was operating due to COVID at the local level of each school. Both public and non-public schools will be submitting their information by month to DHS for issuance of benefits. Any changes for students that were eligible, yet not included on the file transferred to DHS can be added to the next month’s data so that all eligible students receive the benefits that they are entitled to. Only children attending NSLP-participating schools will be eligible for P-EBT benefits in SY 21-22.*
- Describe the roles and responsibilities of each State agency or other partners involved in PEBT (e.g. which agency is responsible for confirming eligibility). *OSDE is taking the eligibility that the school has confirmed based on the students F & R status in SY 21-22, DC status, districts Provision 2/3 or CEP status.*

*DHS is responsible for the eligibility that the non-public school has confirmed based on the students F&R status in SY 21-22.*

*DHS is also responsible for benefit delivery and transfer of issuance file to Conduent for transmission of benefits to EBT card. Conduent is going to be responsible for issuing initial and replacement cards to students.*

- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions. *For ease in issuing benefits uniformly, the State will employ the simplified assumption of August 15, 2021 as being the first day of the 21-22 school year.*

*When estimating the monthly and total of benefits that the State will issue:  
\*\* During the 20-21 PEBT issuance SNAP recipients were 23% of the overall students that were issued PEBT benefits. The State will employ the simplified assumption that the same 23% of PEBT recipients for the 21-22 school year will be SNAP recipients for the calculation estimates. The plan can be amended once data have been received.*

*\*\* As the State limited, up to date data for the 21-22 school year, as to the number/percentage of students that are attending school virtually or in person. Given the current data available, the State will employ the simplified assumption that overall, 10% of students are receiving virtual instruction, 2% of students fall under a hybrid model, and 88% of students are attending completely in person (10/2/88) in order to estimate benefit levels. The plan can be amended once data have been received.*

*\*\* The State will base calculations on 180 instructional day per school year.*

## **B. School Status**

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools. *Each school will report this in the Reporting Platform (RP) that was developed for purpose of these benefits. The reason for this is every district operated differently during the school year based on COVID in their area. The RP can take into account the multiple instruction modalities that the schools have been using at various times throughout each month to capture the actual attendance of an eligible student. Non-public school will report very much the same way via the spreadsheet that is submitted. The school will be validating the information that is in the RP based on how they coded a student's attendance each day in their student information system. SDE is currently designing a different process regarding accountability. They are developing a way for the schools to review and correct any students data in a single use file to then be sent to DHS. The prior school*

*year data (2020/2021) will only be used to fill in missing NSLP enrollment when the current NSLP data is not supplied or missing due to not being collected since many schools are running a summer food program. When there is no NSLP application for a student SDE will direct parents and guardians to fill out and submit a NSLP free and reduced lunch application. The current year application supersedes the prior year's data, if submitted.*

*\*\* Newly eligible school children will be set up and paid from the month they are NSLP eligible to the latest month available for payment in the issuance process.*

*\*\* All eligible school children for the 21/22 school year will be monitored by SDE through September 15, 2022.*

- *How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days? The Oklahoma State Department of Education (OSDE) is allowing each district a chance to review the data that was sent to OSDE from the district's student information system provider through the near real-time collection process established in Oklahoma. This review will allow district staff an opportunity to ensure that each student's Free and Reduced priced lunch status is accurate. The review will also allow districts to review the learning environment for each student. Finally, the review will allow districts to see individual absences and absences types. Oklahoma created a new absence type during the 19-20 SY for the purposes of collecting when students were learning in a virtual or distance learning environment for a short-term period, for COVID response. These codes, along with school calendar data (schools can annotate that a day or days are "virtual" days) allow OSDE to identify when a student is participating in instructional activities in an "in-person", a "blended or hybrid", or a "virtual" environment. Once the data is verified and validated, the data is then used to calculate the number of days that a student participated in instructional activities but did not receive a meal due to not being on-site at a school that participates in the NSLP. This calculation is done on a day-by-day, student-by-student basis based on data sent and verified by school districts within the state.*
- *Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.) Since the program is starting late in the school year, we anticipate schools will be reporting August 2021 through February 2022 at the same time. For the months of March through May 2022, DHS would receive the data via monthly files from SDE that contain the attendance verification of the schools/districts as reported through the RP. If data is not available prior to the end of the school year, the data for the entire school year will be sent to DHS at one time and benefits will be paid in the summer of 2022. This will be the same process used by non-public schools. Minimal reporting will be done monthly, however due to the short time frame for issuing benefits, schools/districts will be submitting reports more frequently than required for each month since the school year began August 15, 2021.*



- Describe the State’s plan for monitoring changes in eligible school status between the State’s bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts. ***The schools will determine this based on the days that the school had to be closed, had reduced attendance or reduced hours due to COVID this will be what they are entering into the RP.***

***Non-public will follow the same method of determination to be submitted via the spreadsheet.***

***Benefits will be issued retrospectively and the benefit amount will be for the actual number of days attended virtually for accurate rate of benefit delivery. \* By utilizing the actual number of virtual days to calculate monthly benefit, there is not a need to calculate a separate hybrid benefit rate for actual issuance.***

REF Q&A regarding fixed benefits amounts

- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions. ***DHS will be making the assumption that the data that is received in the OSDE file has been reviewed and erroneous/inaccurate data has been removed from the file prior to sending to DHS. DHS does not determine eligibility and has no method of validating data that has been entered in the RP. Those tasks shall be the responsibility of OSDE. OSDE will have 30 days in which to review the initial data file and make any corrections prior to the file being sent to DHS.***
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

## 5. P-EBT for Children in Child Care (see Q&As #25-33)

*Standard for P-EBT Eligibility*

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child’s child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child’s inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child’s residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

- How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29) For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child’s eligibility?  
Specifically, how will the State determine that:
  - the child’s child care facility is closed or is operating with reduced attendance or hours, or
  - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for PEBT in those areas?
- Describe the process that the State will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated?  
(Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit?
- Describe the roles and responsibilities of each State agency or other partners involved in PEBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

**6. Benefit Levels**

*Standard for Benefit Levels*

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

<b>SY 2021-2022 July 1, 2021 - June 30, 2022</b>	<b>Free Reimbursements USDA School Meal Progra</b> <span style="float: right;"><b>ms</b></span>
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	Lunch	Breakfast	Snack	Daily Total
<b>Contiguous U.S.</b>	\$3.75	\$2.35	\$1.00	<b>\$7.10</b>
<b>Alaska</b>	6.03	3.78	1.63	<b>11.44</b>
<b>Hawaii, Guam, Virgin Islands, Puerto Rico</b>	4.37	2.74	1.17	<b>8.28</b>

**Notes:**

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs

Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail. ***DHS will issue benefits based upon the actual days each month that each student attends school virtually at the rate of \$7.10 per day. This will ensure program integrity and accuracy of amount of benefits issued, thus reducing the instances of over issuance and/or fraud. The Oklahoma State Department of Education (OSDE) is allowing each district a chance to review the data that was sent to OSDE from the district's student information system provider through the near real-time collection process established in Oklahoma. This review will allow district staff an opportunity to ensure that each student's Free and Reduced priced lunch status is accurate. The review will also allow districts to review the learning environment for each student. Finally, the review will allow districts to see individual absences and absence types. Oklahoma created a new absence type during the 19-20 SY for the purposes of collecting when students were learning in a virtual or distance learning environment for a short-term period, for COVID response. These codes, along with school calendar data (schools can annotate that a day or days are "virtual" days) allow OSDE to identify when a student is participating in instructional activities in an "in-person", a "blended or hybrid", or a "virtual" environment. Once the data is verified and validated, the data is then used to calculate the number of days that a student participated in instructional activities but did not receive a meal due to not being on-site at a school that participates in the NSLP. This calculation is done on a day-by-day, student-by-student basis based on data sent and verified by school districts within the state.***

## **7. Implementation Timeline, EBT Processing, and Benefit Issuance**

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the

- State’s plan (Day #0). *Training for RP use has been provided to schools by SDE. \*\* 0-30 days post launch- data for prior months should start being received by the State. Once a full month of information is received from OSDE (post review and correction if warranted), within 10-20 business days, the State shall send a file for benefit transmission to processing vendor Conduent to issue the benefits.*
  - \*Public media campaign will launch during this time as well.*
  - \*\*Subsequent month’s issuances will be sent to Conduent within 10-20 business days of State receiving the information files from OSDE and the non-public schools. Due to the limited amount of time that the state has to issue the benefits, there will not be a formal dated timeline as to when benefits will be issued. The State will issue benefits as soon as the validated monthly information from the schools is received and OSDE has had the opportunity to review and correct any corrupt/error laden files. This review process should not exceed 30 days before submitting the file to DHS to issue the benefits in a timely manner. The State will issue benefits in corresponding installments by month, over time.*
- The timeline must include the State’s tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to SNAP State agency (Day #5)
  - P-EBT hotline becomes active (Day #9)
  - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? *Yes, the State will issue PEBT benefits on a unique card design.* If so, who will receive these cards, non-SNAP households only? Or also SNAP households? households only? Or also SNAP households? *\*P-EBT benefits for the 2021-2022 school year will be issued on the same cards used for 2020-2021 school year P-EBT and Summer P-EBT benefits. Children eligible 2021-2022 School Year P-EBT that did not receive Summer P-EBT or P-EBT for School Year 20202021, will be issued a card. Each eligible student will have a card. Households with more than with one eligible child will have an individual card for each eligible child.*
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT. *PEBT benefits will be distinguished from SNAP and D-SNAP benefits with the use of a sub-benefit type code “LC” in the eligibility system.*

- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority. ***PEBT benefits will have priority and will be spent before SNAP and D-SNAP.***
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP. ***Oklahoma will follow the same expungement plan as the SNAP program. All PEPT expungements will be set to 274 days.***
- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases? ***The State will use the latest information provided to the local schools by parents/guardians of the child(ren). If a child does not receive a card, they can submit a ticket via the DHS best survey. The survey allows them to report the current address. If an address change is necessary a replacement card will be ordered from Conduent following the change of address.***
- Will you issue ***new*** P-EBT cards to existing P-EBT households?
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households? ***No, new cards will not be issued to existing households. Only children that were not previously eligible, but are eligible for 2021-2022 School Year P-EBT will receive new cards.***
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card? ***If an address change is necessary, the household can complete the DHS best survey and a replacement card will be ordered from Conduent following the change of address. When no changes are needed, the household can also order a replacement by contacting Conduent.***

## 8. Customer Service

### *Recommended Standard for Household Support*

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages States to provide a means to resolve disputes and answer from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential PEBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases. ***Eligibility questions as well as the***

*benefit amounts (based on the number of virtual instruction days per month) will be referred to OSDE and addressed by the local school districts if necessary. Card issuance and benefits transmission issues will be handled by DHS. The same process will be in place for non-public school staff as well. DHS has a BEST survey for families to access/respond to in regard to address changes and/or benefit transmission issues. SDE will notify DHS regarding incorrect data in the RP.*

- *Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities. Every public school student in the state is issued an identification number upon entering the OSDE system that follows them throughout their entire scholastic career. This unique identifier is known to families of the public school system as it is the identifier used to enroll the student in school each year as well as used for school lunch payments/tracking. This unique identification number will compensate for children without social security numbers, foster children and homeless children.*

*Non-public schools are assigning the same type of unique identifier to their PEBT eligible students. This assigned identifier will be using a different range of numbers than OSDE to avoid any duplication in numbers.*

*There is not an application process required by the state in order to receive PEBT benefits. The State will be issuing benefits and PEBT cards based on the information that is provided to DHS systems personnel by OSDE and the DHS unit responsible for non-public schools. There will be contact information included in the media campaign that will inform students and their families as to how and who to contact with possible issues related to the PEBT program.*

- *Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population). **Oklahoma will conduct a public information campaign with a media release as well as social media release alerting Oklahoman's about the PEBT program details as well as how the benefits can be used. DHS will send out a letter to households receiving PEBT that:***
  - \* Describes the program*
  - \* Explanation of how and where benefits can/cannot be used*
  - \* Explanations of violations and penalties (such as trafficking)*
  - \* Notification that benefits are non-transferable*
  - \* Information regarding a hotline, help desk, or website/portal that participants can reach out to, if they have questions and/or need assistance. Including when to contact their school and when to reach out to DHS*

***\* In addition, a buck slip will be inserted with PEBT cards that contains information about how to pin the card, what to do if the household does not want the benefit and a nondiscrimination statement.***

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc. ***Oklahoma will include a buck slip with the PEBT card that contains information about the program, including what to do if a household does not want the PEBT benefit that they have been issued.***
- Describe the information you will provide ***directly*** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
    - A description of P-EBT
    - Instructions for PINing a P-EBT card
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
    - Explanation of violations and penalties, such as trafficking
    - An indication that benefits are non-transferable
    - Instructions for destroying the card, if they want to decline benefits
    - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

***Oklahoma will include a buck slip with the P-EBT card with information about the program, how to activate the card as well as how the P-EBT card can be used. It will also inform how long benefits will remain on the card. The buck slip has one side English and the other Spanish. There are also two phone numbers on the buck slip with one to report problems with the card and one for contacting Oklahoma Human Services regarding problems associated with issuance itself or to decline the benefits. A letter has been developed and will be mailed to all P-EBT households identified that explains relevant program information to potential or actual P-EBT households. The State will develop a process for corrections regarding eligible P-EBT households who were not included in data match for P-EBT eligibility.***

- ○ How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households? ***Please see above response.***
  - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips. ***Oklahoma will utilize the use of both buck slips and a letter that will be mailed to both SNAP and non-SNAP households, that are PEBT eligible, with relevant information about the program.***

- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means? ***The State intends on providing information on social media platforms as a part of their public information campaign.***

## 9. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your State will manage P-EBT payment errors.

### **Response:**

***In coordination with the Oklahoma State Department of Education the Oklahoma Human Service Benefit Integrity and Recovery team will review all referrals of potential overpayments for validity. OSDE shall provide DHS with an improper data file that includes all cases that received PEBT payments in error, whether by amount issued or if completely ineligible for benefits. At this time PEBT overpayments are not being submitted to the Benefit Integrity and Recovery unit of DHS, per USDA/FNS guidance. Regardless, this data will be coded and stored separately from SNAP benefits. However, if the PEBT benefit remains unused or the card is never activated the PEBT benefit will be recouped from the EBT card to resolve the improper payment. If the over-issuance is disputed, the Agency will follow our Fair Hearing Appeal process. OSDE would cooperate with DHS on the establishment of any improper payment(s).***



*Given the 30 day review process by SDE prior to the file being sent to DHS for benefit issuance, we hope to drastically reduce the number of improper payments that take place. The state will contact USDA whenever an issuance error has been identified and provide a description of the error, the number of children involved, and the value of the over-issuance. This will be done before issuing a corrected benefit to a different household and before any attempt to reclaim benefits from anyone.*

## **10. Benefit Issuance Reporting**

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements. *The State agrees to comply with the above requirements.*

## **11. Administrative Funding**

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly. *DHS is in the process of collecting data to be included in a budget plan for administrative funding grant. This plan can be amended once that data collection is complete and State administrative costs have been confirmed.*

## **12. Release of Information**

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B.

Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

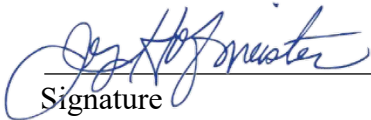
**13. Civil Rights Statement**

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.


**14. Administration of State P-EBT Plan**

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

**Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:**

  
Signature

Joy Hofmeister, State Superintendent of Public Instruction

  
Signature

Justin B. Brown, Secretary of Human Services and Early Childhood Initiatives

**Date of Request** May 12, 2022