

**State Plan for Pandemic EBT  
Children in School and Child Care, 2020-2021**

<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, 2020-2021
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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 school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

***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 should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.*

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2020-2021**

1. **State:** Alabama
2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);  
Continuing Appropriations Act, 2021 and Other Extensions Act;  
Consolidated Appropriations Act, 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).

*Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.*

**Response:** Alabama proposes to resume its previously approved P-EBT plan that issued P-EBT benefits for the months of March, April, and May 2020 (Cycle 1) while incorporating new revisions to the operating procedures for eligibility determination, household data transfer, and benefit issuance. This P-EBT plan will be split into two cycles identified as cycles 2 and 3. Benefits will be issued in these cycles as indicated later in this plan. During these cycles, students will be identified as virtual or hybrid learners. Virtual is defined as a student who only attended virtual classes during the month. Hybrid is defined as a student who participated in person and virtually during the month.

- a. The *date range* covered by this State plan or amendment
  - for children in school: August 2020 through May 2021
  - for children in child care: October 2020 through May 2021
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Total amount of P-EBT benefits for SY 2021 anticipated by the State is \$461,241,825
  - Estimated amount issued to school children in SNAP households.
    - \$194,612,230 (\*See calculations below)
    - $(226,567 \times 40\% \text{ Virtual} = 90,627) + (226,567 \times 60\% \text{ Hybrid} = 135,940)$
    - $(90,627 \times \$122.76 = \$11,125,371) + (135,940 \times \$61.38 = \$8,343,997) =$   
\$19,469,368
    - $\$19,469,368 \times 10 \text{ months} = \$194,693,680$

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

- Estimated amount issued to school children in non-SNAP households
    - \$211,265,880 (\*See calculations below)
      - $(245,956 \times 40\% \text{ Virtual} = 98,382) + (245,956 \times 60\% \text{ Hybrid} = 147,574)$
      - $(98,382 \times \$122.76 = 12,077,374) + (147,574 \times \$61.38 = \$9,058,092) = \$21,135,466$
      - $\$21,135,466 \times 10 \text{ months} = \$211,265,880$
  - Estimated amount issued to non-school children in child care:
    - \$110,564,531 (\*See calculation below)
      - $112,582 \times \$61.38 \text{ (Hybrid)} = \$6,910,283 \text{ monthly} \times 8 \text{ months} = \$55,282,265$
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
- Total number of P-EBT students for SY 2021 anticipated by the State is 585,105
  - Estimated number of school children in SNAP households
    - 226,567 (40% anticipated to have participated as virtual, 60% anticipated to have participated as hybrid)
  - Estimated number of school children in non-SNAP households
    - 245,956 (40% anticipated to have participated as virtual, 60% anticipated to have participated as hybrid)
  - Estimated number of non-school children in child care  
112,582

Note: Some children included in child care group may receive benefits in the SNAP student group. To prevent duplication of benefits, prior to issuing to child care children, P-EBT issuance file for SNAP school children will be compared to SNAP child care children file to identify and remove duplicates.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- The State will detail the estimated total amount of administrative funds needed to complete P-EBT on FNS-366(a).
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households:
    - August 2020 - December 2020: EBT cards will be issued in May 2021
    - January 2021 - May 2021: EBT cards will be issued in July 2021
  - School children in non-SNAP households:
    - August 2020 - December 2020: EBT cards will be issued in May 2021
    - January 2021 - May 2021: EBT cards will be issued in July 2021
  - Children in child care:
    - October 2020 - December 2020: EBT cards will be issued in June 2021
    - January 2021 - May 2021: EBT cards will be issued in July 2021

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<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

<b>Cycle 2</b>	
<b>School Districts</b>	<b>Cards Issued</b>
TBD	May 10
TBD	May 11
TBD	May 12
TBD	May 13
TBD	May 14
TBD	May 17
TBD	May 18
TBD	May 19
TBD	May 20
TBD	May 21
Child Care	June 12

<b>Cycle 3</b>	
<b>School Districts</b>	<b>Benefits Issued</b>
TBD	July 10
TBD	July 11
TBD	July 12
TBD	July 13
TBD	July 14
TBD	July 17
TBD	July 18
TBD	July 19
TBD	July 20
TBD	July 21
Child Care	July 25

- The State of Alabama commits to informing the USDA of any significant increase or decrease in these data points during the date range covered by this initial plan (or subsequent amendment).

#### **4. P-EBT for School Children**

##### **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 2020-2021, *or*
  - b. certified through submission of a household application processed by the child's school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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 2019-2020 graduates and other non-students.
  - The Alabama State Department of Education (ALSDE) will create a database of Alabama school districts. The database will indicate the school district's learning options due to the COVID-19 pandemic (i.e. V = Virtual or H = Hybrid). This database will also indicate which students participate in the National School Lunch Program (NSLP). Only active school children eligible for P-EBT will be included in the database for file sharing between the ALSDE and the Alabama Department of Human Resources (DHR).
- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals? 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.
  - ALSDE will obtain this information from the individual schools to identify children that are directly certified or have recently applied and been approved for the NSLP.
  - The ALSDE will provide DHR with the data for the students that are eligible for free or reduced priced meals and therefore eligible for P-EBT.
  - ALSDE is relying on a combination of SY 19-20 free and reduced-price eligibility data and new applications including direct certifications determined since the start of SY 20-21.
    - Students who were eligible for free and reduced meals for SY 19-20, remained eligible at the beginning of SY 20-21, as long as they were/are enrolled in school.
    - Graduates are not included in the file since they are not in enrolled status for SY 20-21.

- ALSDE has notified parents/guardians that if their income, has been reduced, their child may be eligible for the P-EBT program and advised them to contact their student's school to complete a free/reduced form.
  - SNAP and non-SNAP recipients in public schools will be included, if otherwise eligible.
    - ALSDE data will display a unique lunch code for SNAP recipients.
    - ALSDE data will display a unique lunch code for Non-SNAP recipients such as Direct Certified, TANF, Foster Care and Homeless children.
  - Children that attend private schools will have their eligibility and data sent directly to DHR in a procedure described in the later part of this plan.
  - Alabama will provide benefits retroactively for students determined eligible for NSLP anytime during the school year.
    - The retroactive benefits will be based on the predominate learning plan for the school and other students.
- How will the State confirm each child's lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
    - The ALSDE maintains a database that is updated monthly on the status of each school system that is virtual or hybrid. The ALSDE data will also notate schools that have experienced unexpected closures which resulted in virtual learning plans when reopened after a scheduled break.
      - ALSDE will identify students as Virtual when he/she participated in a virtual learning plan for the month.
      - ALSDE will identify students as Hybrid when the student participated in a hybrid learning plan for the month.
    - SNAP and non-SNAP recipients in public schools will be included in the same file provided by ALSDE.
      - SNAP recipients will be identified by a unique lunch code for SNAP recipients.
      - Non-SNAP recipients will be identified by unique lunch codes as follows: Direct Certified, TANF, Foster Care and Homeless.
  - 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 school district database maintained by the ALSDE is updated through an internal process monthly. This allows ALSDE and DHR to monitor the status of schools and determine student's access to school meals.
  - Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
    - DHR and ALSDE will serve as the principal partners for the P-EBT program. Eligibility for P-EBT will be determined by ALSDE as well as the transfer of the household data (i.e. name, date of birth, address, etc.) for the students deemed eligible for the program. DHR will be responsible for the issuance and of SNAP benefits and EBT cards.

- Community Partners will not be included in the determination of eligibility or the issuance of P-EBT.
- 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.
  - DHR is proposing to utilize simplifying assumptions for the issuance of P-EBT benefits based on the child’s learning plan.
  - Virtual students will be defined as students that learn remotely away from the school campus on a web-based platform. Virtual students will receive P-EBT benefits for a set number of days for each month (18 days) included in the P-EBT issuance.
  - Hybrid students will be defined as students that learn both in the classroom on the school’s campus as well as learn remotely away from the school campus on a web-based platform. Hybrid students will receive P-EBT benefits for a set number of days for each month (9 days) included in the P-EBT issuance.
  - DHR also proposes to issue P-EBT benefits retroactively to ensure that eligibility has been confirmed for each month of issuance in order to maintain program integrity and accuracy.

- **Alabama Private Schools Included**

The Alabama State Department of Education (ALSDE) has verified that the following private schools participate in the National School Lunch Program (NSLP) and School Breakfast Program (SBP):

Private Schools:

- |  |                   |
|--|-------------------|
| ○ Ft. Rucker Dependents School AOC         | (Ft. Rucker, AL)  |
| ○ Holy Family School A1Z                   | (Huntsville, AL)  |
| ○ Little Flower School A29                 | (Mobile, AL)      |
| ○ Maxwell AFB Elementary School A1V        | (Maxwell AFB, AL) |
| ○ Most Pure Heart of Mary School A2A       | (Mobile, AL)      |
| ○ Prichard Preparatory B1T                 | (Whistler, AL)    |
| ○ Resurrection Catholic School ADR         | (Montgomery, AL)  |
| ○ Sacred Heart School A23                  | (Cullman, AL)     |
| ○ St. Barnabas School A25                  | (Birmingham, AL)  |
| ○ Cornerstone Schools of Alabama, Inc. AX4 | (Birmingham, AL)  |
| ○ St. Vincent De Paul                      | (Mobile, AL)      |
| ○ St. James School A26                     | (Gadsden, AL)     |
| ○ Ephesus Academy B8U                      | (Birmingham, AL)  |
| ○ St. Mary’s School A2E                    | (Mobile, AL)      |
| ○ Trinity Lutheran Evangelical School      | (Mobile, AL)      |
| ○ Vivian B. Adams School ADH               | (Ozark, AL)       |
| ○ New Life Christian Church Academy B5F    | (Troy, AL)        |
| ○ Developing AL Youth Foundation B6B       | (Alabaster, AL)   |

- Holy Family Christo Rey Catholic BC0 (Birmingham, AL)
- Altapointe Health Mobile Mental Health Center A3H (Mobile, AL)
- Glenwood Mental Health Services (Birmingham, AL)

## 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.
  - DHR will defer to ALSDE to identify, confirm, and monitor the status of individual schools for the months included in the P-EBT issuances. ALSDE will provide this information to DHR.
  - ALSDE maintains the status of each school on a monthly basis to account for virtual students and hybrid students.
  - ALSDE maintains data for school/classroom closures due to COVID-19, which resulted in a change to virtual learning plans.
  - ALSDE will provide this data to DHR.
- 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?
  - ALSDE will confirm for DHR if a school was operating with reduced attendance or hours for a minimum of 5 consecutive days.
- 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.)
  - ALSDE will provide school status information to DHR (virtual, hybrid, in-person, delay). ALSDE updates this information monthly. The school status for the retroactive months included in the P-EBT plan are readily available to share with DHR.
  - ALSDE will analyze student learning plans for each school to determine the predominate learning plan for the school each month.



- ALSDE will analyze school delays and closures to determine the predominate learning plan for the school each month.
- ALSDE will provide the learning plan data to DHR on a student level.
- ALSDE will identify students as virtual regardless of the predominate learning model at the school, if the child is “parent-held” meaning parent elected to have child participate only virtually.
- Each student will be assigned a code identifying them as hybrid, virtual, in person, or delayed for each month.
  - Students who are assigned virtual (V) will receive the full monthly benefit
  - Students assigned hybrid (H) will receive one-half the benefit amount
  - Students assigned in-person (P) learning will not receive benefits for that month
  - Students assigned delayed (D) will be treated as virtual and receive the full monthly benefit amount
- ALSDE will provide data on April 23, which will better represent actual learning plans for students and allow for DHR to calculate benefits that are based on this more reliable data.
- 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.
  - DHR proposes to issue P-EBT benefits retroactively to allow accurate collection of the updated school data from the ALSDE. P-EBT benefits will not be issued prospectively.
- 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.
  - DHR acknowledges that the majority of schools in Alabama offer a virtual or hybrid option. In addition, many schools have experienced an unexpected closure and had to switch to virtual learning when reopening school after a scheduled break (i.e. summer break, holiday break, etc.) due to COVID-19 positive cases amongst students and/or staff. For this reason, many schools have met the minimum 5 day threshold due to a closure or operation at reduced attendance. DHR proposes to begin these considerations for the school’s operating status as early as August 2020. The data provided by the ALSDE will allow DHR to include the school’s unexpected closure or alternative plans when determining eligibility for P-EBT.
  - Most, if not all of Alabama’s school districts participated in virtual learning or hybrid learning plans during the beginning of the 2021 school year.
  - Most of Alabama’s school districts experienced delays in opening at the beginning of the 2021 school year.
  - Many of Alabama’s school districts switched to virtual learning when reopening schools after scheduled holiday/seasonal breaks.

- Most, if not all school districts met the minimum of the 5 day threshold due to reopening delays, closures or operated at reduced in-school attendance during the first one-half of the school year (Cycle 2)
- The data provided by the ALSDE will allow DHR to include the school's unexpected closure or alternative plans when determining eligibility for P-EBT.
- Alabama proposes to use actual monthly school data prior to issuance benefits for Cycle 2 and 3 to determine that school districts, schools and children are categorized correctly

## 5. P-EBT for Children in Child Care

### *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 received SNAP benefits at any time since October 1, 2020.
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.
  - Alabama DHR will identify children under age six through SNAP Participation files after P-EBT issuance to P-EBT school children.
  - If children under age six have not already received P-EBT benefits, they will be listed in a separate file, which will be used to issue P-EBT benefits on the household's SNAP EBT card.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
  - Each child's demographic information will be used to match SNAP records to identify SNAP participants and avoid duplication of benefits. SNAP children who are not found on the previously issued student P-EBT file during the current cycle will be issued benefits on the household's active SNAP card.
  - DHR does intend to issue P-EBT cards to all participants.
  - However, for children that are in childcare and currently receive SNAP, the State will issue the P-EBT benefits on the household's regular EBT card.
  - DHR will match the household's data file from ALSDE before adding P-EBT benefits to the SNAP case for child care aged children.
  - This is in an effort to avoid issuing P-EBT benefits to a child under age six who may also be in school.
- 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?
  - For the purpose of determining eligibility for child care aged children "area" is defined as county.

- ALSDE will collection student learning plan data from local school districts.
- ALSDE will identify the county in which each school district is located.
- ALSDE will provide monthly learning plan data for each school district by county, this document will include the number of hybrid, virtual, and in person students.
- DHR will use school district information provided by ALSDE for school children to determine that a child care aged child's residence is in an area where one or more schools were closed or operating with reduced attendance or hours.
- DHR will use school district information provided by ALSDE for school children to determine the benefit level for child care aged children.
- Based on preliminary information from ALSDE, all of Alabama's school districts in the 67 counties were affected by a delayed opening and closures, which resulted reduced attendance/hours based on recommendations from the Governor and ALSDE.
- Based on information from DHR's Child Care Division, childcare facilities have experienced reduced attendance; however, it isn't feasible to identify and collect data needed for children who attend childcare as well as children who are not attending childcare. DHR is proposing to utilize a more simplified approach by using data provided by ALSDE.
- All school districts/counties participate in various hybrid learning plans which include virtual learning; as a result, all school districts/counties have experienced reduced physical attendance/hours.
- DHR will reassess the P-EBT benefit amount based on monthly data received from ALSDE and will adjust as needed.
- DHR will submit any adjustments or amendments to the waiver if needed and will submit to FNS for approval.
- 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? N/A Specifically, how will the State determine that: N/A
  - 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? No If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas? N/A
- 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.)
  - ALSDE will provide to DHR monthly data for school children, which will be the basis for determining eligibility for child care children if they are located

in an area where one or more schools are operating with reduced attendance or hours.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
  - DHR and ALSDE will serve as the principal partners for the P-EBT program for child care children.
  - DHR will determine, using data from ALSDE, which school districts/counties are operating with reduced attendance based on those who participate in virtual learning instructions.
  - DHR will identify children ages 0 – 5 who receive SNAP benefits. Children who meet both requirements are deemed eligible for P-EBT benefits.
  - DHR will issue P-EBT benefits retroactively to allow accurate collection of the updated school data from the ALSDE.
  - DHR will be responsible for the issuance of P-EBT benefits on the households SNAP EBT cards.
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.
  - DHR proposes that based on FFCRA, USDA all children under the age of 6 are deemed to be enrolled in a covered child care facility.
  - DHR proposes to issue P-EBT benefits to SNAP children under age 6 who have not received P-EBT benefits as an eligible student enrolled in an institution which participates in the NSLP.
  - DHR proposes to determine based on current learning plans, one or more schools in each district/county participate in virtual learning plans, and therefore have and continue to experience reduced attendance.
  - Child care children will receive P-EBT benefits for 9 days, consistent with benefits which will be received by students with hybrid learning plans in school districts.
  - Child care children who reside and receive SNAP benefits in a county in which one or more school districts participated predominately in virtual learning will receive a benefit for 18 days.

## 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 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	<b>\$6.82</b>
Alaska	5.79	3.64	1.56	<b>10.99</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	<b>7.97</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-2020-07-22/pdf/2020-15764.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.
  - In an effort to structure the program in a way that is more beneficial to students, Alabama intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct amounts, one amount for students enrolled in a fully virtual learning mode (inclusive of students whose school district is operating an in-person or hybrid model but the family opts into fully virtual learning) and one amount for students enrolled in a hybrid learning mode (inclusive of students who are absent from an in-person learning model due to COVID and the need to quarantine and/or sanitize).
  - The fully virtual benefit amount will be calculated using a monthly average based on the school calendar. This method factors in school holidays and seasonal breaks; and allows Alabama to spread the total maximum benefit for the school year across multiple months. In Alabama, there are 180 days required per school year (10 months) which makes the average 18 days/month. Alabama believes using 18 days to determine the fully remote amount is reasonable. This allows the state to issue one consistent benefit of \$122.76 per month ( $\$6.82 \times 18$  days), thus mitigating household confusion.
  - For the calculation of the hybrid benefit amount, Alabama used the following information provided in communications with ALDSE, on a statewide average, it is anticipated that students learned virtually 2.5 days per week when schools operated a hybrid learning model. Using a standard conversion factor (18 days of benefits/5 days per week) of  $3.6 \times 2.5$  extrapolates to 9 days.
  - Based on the most reliable information to date, DHR reviewed data from ten randomly selected school district for the first nine weeks of school, 47% of

students participated virtually 48% of students participated in person and were identified to have participated in blended.

- Statewide 3% Alabama’s students were classified as “parent held” and participated 100% virtually.
- Calculating the hybrid amount to equal 9 days allows school districts operating in a fully in-person model to categorize any student’s absent due to COVID as “hybrid” for that month. The hybrid benefit amount will equal  $\$6.82 \times 9$  hybrid virtual days for the month= $\$61.38$ ). Alabama agrees to collect data to reassess this average every two months. This will confirm whether the current hybrid calculation remains the same or will change. Alabama reserves the right to revise these projections based on subsequent data received from ALSDE.
- The requirement to calculate the exact number of days each child missed is anticipated to lead to confusion with parents and other stakeholders when issuing P-EBT payments. Additionally, ALSDE has reported significant challenges in tracking and calculating the number of P-EBT eligible days. Variations in hybrid models is the primary contributor to the challenges. Many districts employed different hybrid schedules in different schools within their districts. This led to inconsistencies in administration within and across districts.
- To account for the fluid nature of the pandemic and that a student’s status may change mid-month, the state will be issuing benefits retroactively for previous months using the learning mode that the student is enrolled in for most of that month. Furthermore, for students who become eligible for P-EBT mid-month, the learning mode they were enrolled in for most of that month will inform their benefit amount.

P-EBT Benefit Level for School Year (SY) 2020 – 2021:

Breakfast \$2.26 + Lunch \$3.60 + Snack \$0.96 = \$6.82 (per child, per day)

**Virtual and Hybrid Students:**

P-EBT Months	Proposed Issuance Month
August 2020 - December 2020	May 2021
January 2021 - May 2021	July 2021

Learning Plan	Daily Total (\$6.82)
Virtual: 18 School days per month	\$122.76 Per month
Hybrid: 9 School days per month	\$61.38 Per month

**Child Care:**

P-EBT Months Child Care Children	Proposed Issuance Month
October 2020 - December 2020	June 2021
January 2021 - May 2021	July 2021

Learning Plan: Child Care Children	Daily Total (\$6.82)
Hybrid: 9 School days per month	\$61.38 per month

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

Please provide an implementation timeline for SY 2020-2021 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).
- The timeline must include the State’s tentative issuance dates. In SY 2019-2020, 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.

**Alabama proposes the following milestones:**March:

- P-EBT plan approval
- ALSDE will contact parents/guardians to provide current household information (i.e. current address) no later than March 31, 2021
- Parents/guardians that have experienced a change in income or household circumstance may apply for free or reduced lunch in an effort to establish eligibility for P-EBT
- DHR will establish a customer service plan with ALSDE to address discrepancies regarding household address, student information, parent/guardian information, school enrollment, learning plan, etc.

Additional Information

- During the 2020 P-EBT program, DHR addressed several discrepancies in which the household data (i.e. mailing address) was outdated, incomplete, or incorrect. In an effort to issue EBT cards to the correct households, the ALSDE advised school districts to notify parents/guardians to update household data for all children in the household by

March 31, 2021. ALSDE notified parents/guardians with a flyer and website information to update their address or apply for free or reduced lunch if the household's income had changed. In addition, some schools sent letters from the Child Nutrition Director to parents/guardians to encourage them to update their information in the event that P-EBT is implemented for the 2020-2021 school year.

April:

- ALSDE will provide a student data file to DHR for August 2020 through December 2020

May:

- P-EBT customer service hotline will become active
- Both DHR and ALSDE will staff the customer service hotline
- P-EBT benefits will be issued for August 2020 through December 2020 for virtual and hybrid students
- Child care benefits will be issued for October 2020 through December 2020
- Child care will be issued 2 weeks after virtual and hybrid grade school students

June:

- ALSDE will provide a student data file to DHR for January 2021 through May 2021

July:

- P-EBT benefits will be issued for January 2021 through May 2021 for virtual and hybrid students
- Child care benefits will be issued for January 2021 through May 2021
- Child care will be issued 2 weeks after virtual and hybrid grade school students

**Additional Information**

- DHR is proposing to administer P-EBT benefits in two issuances due to system constraints. DHR understands that there may be an additional issuance of P-EBT benefits available for the summer months, which will be addressed in the form of an amendment to the approved P-EBT plan, pending additional guidance from FNS. DHR has confirmed with the Alabama Grocers Association (AGA) that the issuance time frames proposed for P-EBT are feasible for AGA based on supply concerns. DHR will consider adjusting cycle 3 until the final week of the month.
- DHR will involve all relevant stakeholders as the P-EBT plan is revised, approved, and implemented. DHR will notify all stakeholders if there is a delay, discrepancy, or unforeseen circumstances in the implementation of the P-EBT program. DHR will utilize conference calls and/or virtual meetings to communicate challenges, questions, or possible amendments, in order to find feasible solutions.

**EBT Processing and Benefit Issuance:**

- DHR will utilize the data contained in the ALSDE file to confirm household records.
- Those household records will then be batched to the DHR EBT vendor to create new EBT accounts.



- The calculated benefit amount for the associated benefit month will be loaded on the EBT cards via a batch file to the EBT vendor.
- An EBT card along with a notice explaining the P-EBT program will be mailed to the household based on the address listed in the ALSDE file.
- EBT cards are mailed as “secured” mail and will be returned to the EBT card vendor if the address is incorrect or the address has a “forward mail” order.
- DHR is proposing NOT to implement an application process for P-EBT due to the readily available data from ALSDE.
- DHR confirms that it has access to sufficient card stock on hand to successfully begin operations for the number of households listed below.
- DHR is working with the EBT vendor, Conduent, and including them in the planning process for the P-EBT program.
- Returned or undeliverable EBT cards will be returned to the EBT vendor, Conduent, and the information will be sent in a file to DHR. The file will be reviewed and reconciled by DHR.
- Name and signature of head of household is kept on file as part of the ALSDE’s records for free and reduced lunch for Non-SNAP children and is on record in the DHR system for existing SNAP children.
- DHR agrees to complete the FNS-292 form on a timely basis in accordance with requirements 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.
- DHR plans to follow the same expungement pattern of benefits for P-EBT as regular SNAP benefits, which is 365 days.
- DHR reserves the right to amend this plan or submit changes for approval to the Food and Nutrition Service (FNS) based on any additional information received from the ALSDE, Conduent (EBT vendor), or State Office DHR.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
  - Yes, P-EBT benefits will be issued on a unique P-EBT card design. All students SNAP and non-SNAP will receive P-EBT benefits on a P-EBT card.
  - All child care aged children not previously identified as a student, will be added to the households active SNAP EBT account and issued a P-EBT card.
- 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 2019-2020. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.
  - The State will use a separate benefit type for P-EBT benefits – FSEVAC.
- 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.

- All P-EBT benefits will be issued on a unique EBT account therefore there will be no draw/spend priority as the P-EBT benefits will be the only benefits issued on that account.
- 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.
  - EBT benefits will expunge after 365 of non-usage. This is the same expungement rule as regular SNAP benefits.
- During SY 2019-2020, 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 EBT Processor (Conduent) will be responsible for processing all cards returned as “Undeliverable”. Returned cards will be destroyed by the vendor and marked as “Undeliverable” in the EPPIC system. All of the cards which have been destroyed will be included in the “Monthly Card Destruction” report.
  - Upon notification from the household that card wasn’t received, the EBT Help Desk will investigate to determine if a P-EBT card was issued; if it was activated or been returned to the vendor, if returned to vendor, card will be reissued based on address reported and verified by the household.
- Will you issue *new* P-EBT cards to existing P-EBT households?
  - Yes, new P-EBT cards will be issued to existing P-EBT households
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
    - All P-EBT recipients will receive their benefits on a P-EBT card (SNAP and Non-SNAP)
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card? N/A

## 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 questions from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT 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.

- DHR will establish a Customer Service Unit to resolve disputes or issuance errors of P-EBT benefits. A hotline phone number will be established for parents/guardians to contact DHR and report issues.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
  - DHR will work with ALSDE to assist households that have issues accessing to P-EBT.
  - Homeless children, foster children, and children without a social security number will have an opportunity to update household data with their school district to ensure P-EBT benefits are accessible.
  - Limited English Proficiency households may contact the customer service line and a translator service will be provide free of charge.
  - The EBT insert delivered with the EBT card will include instructions in English and in Spanish.
  - Individuals who are hearing impaired, hard of hearing or have speech disabilities can call the Alabama Relay Service at 711 or 800-548-2546 (TTY)
  - Free Communication Assistance information is included on the DHR website at: <https://dhr.alabama.gov/free-communication-assistance/>
  - ALSDE offers assistance accessibility. Inquires may be submitted at: <https://www.alsde.edu/accessibility>
- 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).
  - DHR and ALSDE will issue a joint press release to announce the P-EBT to the general public in order to inform parents, guardians, and the general public of program details and eligibility criteria
  - ALSDE will contact parents/guardians with text message notifications and printed materials (i.e. flyers)
- 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.
  - All eligible students will be issued P-EBT benefits according to the household data provided by the ALSDE
  - If a parent/guardian would like to opt out of the P-EBT program, instructions on how to destroy the P-EBT card will be included as an insert with the card
- 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 Spring and Summer of 2020, 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)
  - General information will be included as an insert with the EBT card such as: P-EBT program information, EBT card activation, instructions for choosing a PIN number, benefits are non-transferrable, violations and penalties, instructions for destroying the card
  - EBT (Conduent) customer service number and website will be located on the EBT card
  - Additional information will be provided by ALSDE through mass text messaging, website, and written announcements
  - P-EBT description and uses will be included on the DHR website
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
  - 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.
    - ALSDE will make flyers and brochures available to parents/guardians
    - Finalization of the plan for contact will be established prior to implementation of the P-EBT plan
    - DHR and ALSDE will issue a joint press release to announce the P-EBT to the general public in order to inform parents, guardians, and the general public of program details and eligibility criteria
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?
    - DHR will detail the P-EBT program and eligibility criteria on the DHR website for the general public at: <https://dhr.alabama.gov/>

- The State will provide the hotline number for inquiries when the contract for the vendor for P-EBT customer service has been finalized.

## **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.

- Alabama will make all reasonable efforts to detect over-issuances and improper payments. These efforts will include utilizing established methods and channels to receive tips, complaints, and referrals regarding P-EBT activity. We will coordinate with relevant state agencies and local authorities for case data collection and analysis, conduct follow up inquiries as appropriate, and refer cases to Alabama Food Assistance Claims Unit for final claims processing.
- Claims will be established for client caused errors according to the current SNAP policy in which benefit issuance meets the claims threshold of \$225.00
- Claims will not be established for administrative errors caused by DHR and/or ALSDE

## **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 of Alabama acknowledges the above statement regarding benefit issuance reporting.

## **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, 2020 through September 30 2021. 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.

- The State of Alabama acknowledges the above statement regarding administrative funding.

## **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.”

- The State of Alabama acknowledges the above statement regarding the release of information.

## **13. Civil Rights Statement**

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

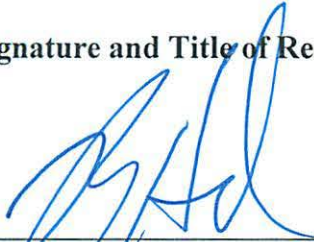
- The State of Alabama confirms that it will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

## **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.

- The State of Alabama acknowledges the above statement regarding the administration of the State P-EBT plan.

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



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Brandon Hardin, Director  
Alabama Department of Human Resources  
Food Assistance Division

*Angelice S. Lowe* 4-01-2021

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Angelice Lowe, Program Director  
Child Nutrition Programs  
Food Distribution/Statewide Procurement  
Alabama State Department of Education

Date of Request:

4/1/2021