

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
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Summary:	(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).
Disclaimer:	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.

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:** Kansas

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*¹ 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:

a. The *date range* covered by this State plan or amendment

- for children in school:

The date range that this State plan will cover for children in school is August 2020-May 2021.

- for children in child care:

The date range that this State plan will cover for Childcare P-EBT is October 2020-May 2021.

b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.

- Estimated monthly amount for School P-EBT: \$4,806,590
- Estimated total amount to be issued for August 2020- May 2021 = \$48,065,900 **school P-EBT** all benefits will be issued in a retroactive fashion.
- Estimated monthly amount for Child Care P-EBT: \$2,943,683
- Estimated amount to be issued for October 2020-May2021for **Child Care P-EBT** = \$23,549,458 all benefits will be issued in a retroactive fashion.

¹ 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 total P-EBT benefits School + Child Care = \$71,615,358
 - **Estimated amount issued to school children in SNAP households.**
Estimated amount of school children in SNAP households is \$20,771,150
 - **Estimated amount issued to school children in non-SNAP households**
Estimated amount for non-SNAP households is \$27,294,750
 - **Estimated amount issued to non-school children in child care**
Estimated amount issued to non-school children in child care is \$23,549,458
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
The estimated total number of children to which the state will issue P-EBT benefits is approximately 255,144
- Estimated number of school children in SNAP households 97,175
 - Estimated number of school children in non-SNAP households 127,695
 - Estimated number of non-school children in child care 30,274

NOTE: More accurate second semester estimates will be available after the second school survey is completed. The 2021 school year total was forecasted using the first survey and adjusting the figures by the number of months.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²

Activity	Estimated Costs
KEES Eligibility System Updates (Attached Change Request)	\$1,644,193
Additional FIS Costs (Attached FIS price estimate & CA)	\$1,110,029
DCF Administrative costs	\$982,957
Total Estimated Admin Costs	\$3,737,179

If needed an amendment will be submitted to this plan to request the additional funding.

- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households
 - i. Payment for SNAP households estimated to be issued within 30-45 days of plan approval to cover August 2020-May 2021.
 1. Benefits will be staggered payment schedule
 - School children in non-SNAP households

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

- i. Payment for non-SNAP households estimated to start issuance within 45 days of plan of approval. This payment will be for the months of August 2020-May 2021. Non-SNAP household issuance will be ongoing through an application process and estimated to take until September 2021 to complete issuance. These benefits will cover August 2020-May 2021.
 - 1. All payments will be issued through a daily issuance batch process.
- Children in Child Care
 - i. The agency will issue October – May 2021 in one payment with staggered issuance over a 10-day period by alpha. Issuance dates are TBD.

Kansas is committed to informing USDA of any significant increase or decrease in data points covered by this initial plan.

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.

Eligibility determinations by income application were conducted by all Kansas sponsors for school year 2020-2021. This data will be used to identify eligible school children for P-EBT.

DCF will use student information data provided by the LEAs to make a match to eligible children in KEES. If a match can be made KEES will issue the appropriate P-EBT benefit

to each child based on their school status by school type. This data will include eligible students in both public and non-public schools for 2020-2021 school year since LEA's are providing current SY20-21 data. DCF will not issue P-EBT benefits to 2019-2020 graduates and other non-students. KSDE will instruct Local Education Agencies (LEAs) not to include any students that have graduated or are no longer enrolled in their school district on their lists.

- 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.
 - For SNAP-recipients, Local Educational Agencies (LEAs) (public and non-public) will provide a list of directly certified students with DCF case numbers to KSDE who will then share securely with Department for Children and Families (DCF).
 - For non-SNAP recipients, who are eligible for free and reduced price meals via application or who are categorically eligible for free or reduced price meals (homeless, migrant, runaway, foster), LEAs (public and non-public) will provide a list of students to the Kansas State Department of Education (KSDE). KSDE will then issue a unique identification number for each qualifying student. The list of students with their unique identifier will be provided to DCF. Each LEA will receive a list of their students and unique identifiers.
 - The LEAs will provide instruction to the families that were not directly certified but are eligible for free or reduced price meals on how to use the unique identifier. The unique identifier sent by the schools to the family confirms that the student(s) are eligible for free or reduced-price meals. This unique identifier will be required to apply through the DCF Online Parent Portal. The identifier will also act as verification for DCF that the child(ren) are eligible for free or reduced-price meals. If the household does not receive or misplaces the unique identifier, they will contact their LEA to receive it. If the household is not receiving free or reduced-price meals the school will offer the household a paper or on-line household income application to determine if they are eligible for free or reduced-price meals and if determined eligible would receive a unique identifier for the child.

KSDE and DCF are using SY2020-21 data. Since benefits will be issued retroactively, new students and students who become eligible during the 2020-2021 school year will be reported by the LEA to KSDE/DCF on their benefits issuance lists.

- 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.

Kansas LEAs (public and non-public) are utilizing three learning modalities for SNAP and non-SNAP-recipient children during the 2020-2021 school year. KSDE surveyed all LEAs in December 2020 to collect data regarding learning modality by school type for

August – December. KSDE will survey all LEAs again in early spring to collect data regarding learning modality by school type for January – May 2021.

- On-site Learning Environment: students and teachers will be in school with or without social distancing practices put into place.
 - Students attending on-site did not lack access to meals at school.
- Hybrid Learning Environment: students would be spending part of their time in the classroom and part of their time learning remotely from home.
 - Students attending in a hybrid model lacked access to meals on some school days each month.
- Remote Learning Environment: students would be doing all of their learning from home and not entering the school building at all.
 - Students learning fully remotely lacked access to meals on all school days each month.
 - DCF will confirm each learning environment through the school survey. The school type information will be linked to the eligible student. The file will be shared through a secure online portal.

School districts will provide retroactive school type level learning models to KSDE/DCF. KSDE will be collecting retroactive school type level learning models for each benefit month. The data that is collected by district (elementary, middle, and high school) will show how many days each school building in each district was On-site, Hybrid, or Remote. This information will be shared in a secure file.

The data from the fall survey confirmed access or lack of access to meals at school:

- 57% of schools in Kansas were in person and did not have remote learning days during the first semester of the 2020-2021 school year.

****Note:** Virtual and Homeschooled students are not enrolled in Kansas LEAs thus, they are ineligible for P-EBT. The previous school year data will not be utilized for benefit eligibility/issuance.

- 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.).

Kansas is a local-control state. Each LEAs board determines the school schedule and learning modality. Individual child data is not available regarding in-person, hybrid and remote schedules. KSDE surveyed all LEAs to determine the number of remote learning days for each school type for each LEA for each month in the fall semester. KSDE will survey all LEAs to determine the number of remote learning days for each school type for each LEA for each month of the spring semester.

- 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).

Department for Children and Families (DCF) is responsible for issuance of P-EBT benefits, as well as the issuance of P-EBT electronic benefit cards and replacement cards, notices to clients and provision of customer service and support. DCF will issue P-EBT retroactively in one payment for the 2020-2021 school year.

End of May is considered the end of the 2020-2021 school year in Kansas. DCF will issue retroactively for January through May. The vast majority of schools will not have classes after May 31, 2021, no benefit amount will be considered for June 2021.

The Kansas State Department of Education (KSDE), in collaboration with LEAs, is responsible for eligibility determination through the direct certification process, the NSLP application process and the monitoring and collecting of learning modalities.

DCF and KSDE will provide guidance documents and support to LEAs and families.

- 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.

The following simplified assumptions are proposed for eligible children:

- Simplifying Assumption #1 - On July 20, 2020 Governor Laura Kelly issued Executive Order No. 20-59 that recommended all schools delay beginning any student instruction from August through September 8, 2020 due to COVID-19. Due to this recommendation by the Governor, we propose that Kansas LEAs that actually had remote or hybrid learning days have met the minimum 5 consecutive day threshold and are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19. This simplified assumption will only be applied to LEAs that indicated on their survey that they actually had remote or hybrid learning days during the fall and/or spring semesters.

The State must use this simplifying assumption because eligible schools would meet the 5-day threshold at various points in the year. Calculating special benefit amounts by school would add additional complexity and work effort that would result in additional administrative burden and delay in benefit issuance.

- Simplifying Assumption #2 - Any child that becomes eligible for free or reduced priced meals at any time during the 2020-2021 school year and are enrolled in a LEA utilizing a remote or hybrid learning model will be retroactively eligible for P-EBT benefits. Due to USDA's COVID-19 emergency meal service waivers, all LEAs were permitted to operate the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) of the National School Lunch Program (NSLP). Both of these programs provide free meals to all students, without the need for households to submit an application for child nutrition program benefits. Since all meals were being provided for free for all students, households may not have

submitted an application until they were notified by the LEA of other potential benefits of application, including P-EBT.

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.

Kansas LEAs (public and non-public) are utilizing three learning modalities for SNAP and non-SNAP-recipient children during the 2020-2021 school year. KSDE surveyed all LEAs in December 2020 to collect data regarding learning modalities by school type (Elementary, Middle and High School) for the months August through December. KSDE will survey all LEAs again in early Spring to collect data regarding learning modalities by school type for the months of January – May 2021.

- 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?

To meet this requirement for school status, the state is proposing the following simplifying assumption:

Simplifying Assumption #1 (same as above)- On July 20, 2020 Governor Laura Kelly issued Executive Order No. 20-59 delaying schools from beginning any student instruction from August through September 8, 2020 due to COVID-19. All LEAs in Kansas could delay their school start date by at least 5 consecutive days at the beginning of the 2020-2021 school year. Due to this Executive Order, we propose that all Kansas LEAs have met the minimum 5 consecutive day threshold and are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19. This simplified assumption will only be applied to LEAs that indicated on the learning modality survey that they had remote learning days during the fall and/or spring semesters.

The State must use this simplifying assumption because eligible schools would meet the 5-day threshold at various points in the year. Calculating special benefit amounts by

school would add additional complexity and work effort that would result in additional administrative burden and delay in benefit issuance.

- 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.)

KSDE surveyed LEAs in December to collect data for each month of the fall semester (August – December 2020). KSDE will survey LEAs in early Spring to collect data for each month of the spring semester (January 2021 – May 2021). The months of April and May shall be prospectively estimated. Most schools in Kansas have a plan in place for what their learning environments will be for the rest of the 2020-2021 school year. COVID-19 numbers are rapidly decreasing in Kansas and all K-12 school personnel have had the opportunity to be vaccinated for COVID-19.

- 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.

Schools will be expected to provide school type status retroactively. Benefits will be issued for the school type learning environment. KSDE is collecting data for each month of the 2020-2021 school year regarding number of days in remote learning by school type. The fall semester data was analyzed by a DCF consultant who determined a state-wide average of remote learning days for LEAs that utilized a hybrid or remote learning modality in the fall semester. See simplifying assumption justification below. For a school type that may change learning environments in April or May that conflicts with the information provided in early Spring they will contact KSDE who will then share that information with DCF to make appropriate adjustments to the benefit level.

Local data is not available to support providing full P-EBT benefits to students that elected to learn remotely but are enrolled in LEAs that are utilizing a hybrid or in-person learning modality. All LEAs in Kansas did provide emergency meal service options to fully remote learners. Kansas LEAs do not have data readily available or able to do a verification reconsideration process. LEAs do not indicate on attendance records why students are absent in Kansas because that would be a violation of HIPPA.

- 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.
- Simplifying assumption #1 for school status is listed above.

Simplifying Assumption #3: Capturing school learning environment by school type.

Reasoning - In Kansas for the first semester the predominate COVID-19 learning model was Hybrid. Any student who was in a learning environment of both on-site and remote in a month is considered in a hybrid learning environment. Any student considered hybrid in a month, will receive one of three hybrid benefit amounts for first semester and as determined for the second semester if eligible.

Although benefits could have been issued based on the entire range of 1 to 22 days remote in each month, it was determined through a statistical analysis of data that there were three clear benefit groups in the fall semester.

This approach provides a means to issue a reasonably appropriate benefit amount to students in the state given the limited data available. The groupings are more generous, meaning no family will get less than they would have received based on all 22 separate amounts. This simplified assumption reduces the administrative burden on the state agencies as well as the LEAs. It will also make it easier to explain to the public and families that are eligible for P-EBT why they received the amount they did. If not for this simplified assumption Kansas may not be able to participate in the P-EBT program. Kansas does not have student level attendance data nor student level learning model data. Each district will report number of days by school type when on-site learning did not take place meaning the school was in a hybrid or remote learning environment.

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.

Kansas will identify eligible children and confirm their eligibility by verifying a child under the age of 6 is currently enrolled in SNAP and resides in the boundaries of a LEA that was closed or operating with reduced attendance or hours. Kansas will auto issue child care P-EBT benefits to all children under 6 on Food Assistance whose address falls within a school district that has been identified as having remote or hybrid learning environment. Children who live within a school district that did not have remote or hybrid learning may apply for child care P-EBT and potentially be determined eligible if their daycare facility was closed or operating at reduced hours.

Learning model data is reported from LEAs to KSDE as outlined in the questions above.

Children who are attending school will receive School P-EBT based on school status. Children over 6 but not attending school may apply and receive child care P-EBT benefits if they meet all three criteria. Households who think they may be eligible for child care P-EBT will be instructed through PSA to contact DCF to obtain a paper application. When the application is processed the household will receive a notice in the mail informing them if approved or denied.

- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

DCF will determine and confirm the child's receipt of SNAP benefit by conducting a match using Kansas Enforcement Eligibility System (KEES). KEES is a secure integrated computer system that DCF uses to determine eligibility for public assistance programs such as SNAP, TANF and Child Care. DCF confirms that all relevant SNAP privacy requirements will be followed.

- 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?

Kansas DCF will use GIS boundary points for school districts to determine that a child's residence lies within the boundaries of a LEA that was closed or operating with reduced attendance or hours. The data is from the U.S. Census Bureau using the ArcGIS mapping tool. The goal is that DCF can enter a child's address and the DCF eligibility system will match the school district the address falls within to determine if the child resides in an area of a school district that meets P-EBT eligibility. DCF will use the district data from the school survey to determine which schools are closed or operating with reduced attendance hours. The mapping tool is defining boundaries based on longitude/latitude lines defined by the school district.

- 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?

For children whose residence is not within the boundaries of an LEA operating with reduced attendance or hours but the child attends a child care facility that is in the area of one or more schools that are closed or operating with reduced attendance or hours, or the child's child care facility is in the area of one or more schools that is closed or operating with reduced attendance or hours, DCF will offer an application process. A paper application will be used for these households. These households will be instructed to contact DCF for a paper application. Manual determination and verifications will be completed by DCF staff. The household may provide verification from the child care facility to verify if the facility was closed or operating at reduced hours due to COVID-19.

If the household is not able to obtain the information DCF will attempt to contact the child care facility for verification to determine that the child care facility was closed or operating with reduced 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 P-EBT in those areas?

There are no statewide prohibitions and it is not reasonably feasible to track local ordinances. This is verified by the state's childcare licensing and enforcement agency.

- 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.)

Kansas will use the process outlined in the first bullet of this section combined with KSDE who will re-establish P-EBT eligibility data through the use of a survey to obtain the number of remote learning days per month from LEAs. DCF does not have childcare facility data to leverage. DCF will use the application process described above to collect data on closed child care facilities.

- 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).

DCF is responsible for issuance of P-EBT benefits, as well as the issuance and replacement of Kansas Benefit Cards, notices to clients and provision of customer service and support. DCF will be responsible for confirming the child(ren) eligibility through KEES automation process and application process. The child care facility is responsible to provide the client with verification so DCF can confirm eligibility for paper applications.

KSDE will provide to DCF the respective districts our SNAP children's physical address resides in based on GIS coordinates.

KSDE will provide to DCF eligibility data through the use of a survey to obtain the number of remote learning days per month from LEAs.

- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Simplifying Assumption #1 –

The State must use this simplifying assumption because eligible school types would meet the 5-day threshold at various points in the year.

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	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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.

Response:

Simplifying Assumption #4 – **PEBT ESTIMATE LOGIC FOR THE STATE OF KANSAS**

All schools reported (to KSDE) the number of days remote for each month (August 2020 through December 2020) during the fall semester of the 2020-2021 school year. Each month and school type (Elementary, Middle, and High School) was reported separately.

Per the Governor's recommendation for all schools to learn remotely during this pandemic, each qualifying school (and each grade level within that school) that reported with any remote days were credited with 5 assumed days in the first month that they reported remote learning.

KSDE provided a count of all students within each school (regardless of grade level) who were determined to be eligible for free or reduced priced school meals during the 2020-2121 school year. That number was then divided by 3 to estimate the number eligible for free/reduced lunches for each school type (Elementary, Middle, and High School). Data in Kansas shows that high school students were more likely to be remote. The state will use a simplified assumption to get a high estimate benefit amount by dividing by 3, each school type, although

there are more elementary schools receiving free or reduced price meals, older children were more likely to have remote learning environment. See table below.

Any school with NO students eligible for free/reduced school lunches were NOT credited with any remote days, reported or not.

The number of students at each school type (divided by 3 to break it down to the 3 grade levels), were then multiplied by the number of days remote (including the credited 5 days at each qualifying grade level). This number was then multiplied by \$6.82.

-No rounding or truncating was included in the estimate numbers.

AUGUST	TYPE	ESTIMATE
08	ELEM	471280.19
08	MIDD	663017.67
08	HIGH	722676.75

		1856974.61
SEPT	TYPE	ESTIMATE
09	ELEM	2178730.84
09	MIDD	3165148.36
09	HIGH	3378757.58

		8722636.78
OCTOBER	TYPE	ESTIMATE
10	ELEM	1235177.02
10	MIDD	2927794.17
10	HIGH	3213945.46

		7376916.65
NOVEMBER	TYPE	ESTIMATE
11	ELEM	1803171.63
11	MIDD	2691040.15
11	HIGH	2945519.35

		7439731.13
DECEMBER	TYPE	ESTIMATE
12	ELEM	2008676.41
12	MIDD	3228178.80
12	HIGH	3395143.77

		8631998.98
		=====
GRAND TOTAL		34028258.15

For Childcare P-EBT the state will leverage the school district school type status data to determine the month benefit allotment amount. DCF will only issue to Child Care children that are in the area of schools that meet the School P-EBT criteria. Child care children will be issued the appropriate P-EBT benefits for the months of October 2020-May 2021 in one issuance. A paper application will be

available for those Child Care children whose Child Care provider was closed or operating at less hours that was not in a school district that was closed or operating at less hours.

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.

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?
- 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.
- 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.
- 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.
- 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?
- 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?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

In Kansas the goal is to issue August 2020 – May 2021 P-EBT benefits within 30-45 days of receiving the approved P-EBT plan. The state may need to change the issuance schedule depending on when the plan is approved. The tentative timeline is as follows:

Day 1 – Plan approval is received.

Day 2- Public Notice campaign begins. KSDE instructs SFAs to provide required data on school status for spring semester within 10 days.

Day 10 – Develop, Build and Test Auto Enrollment process in KEES.

Day 12 – KSDE will follow-up with Sponsors that have not yet submitted eligibility list. KSDE will assign unique identifiers to students eligible based on applications.

Day 15- KSDE will send DCF two lists. 1) Students Directly Certified by LEAs and 2) Students eligible by Application with unique identifiers.

Day 25- Develop, Build and Test DCF Online Parent Portal

Day 30-40 – DCF will begin to issue school and child care P-EBT benefits to directly certified households, notices sent to households.

Day 33 – P-EBT benefits available on cards, start of staggered issuance over a 10 day period for automated benefits.

Day 45- Parent Portal becomes accessible for families to register if not already auto enrolled. KSDE will send list of students eligible by application with unique identifiers to LEAs along with prototype communication for LEAs to communicate application process with eligible families.

Day 46 ongoing – daily P-EBT issuance.

DCF will use the regular Kansas Benefit Card for P-EBT benefits. DCF will not issue new EBT cards to P-EBT households unless the household does not have an active EBT card. A card will be sent to the household if one has never been issued in the past. Kansas will follow the same distribution model utilized in the previous P-EBT program. All EBT accounts are established in the name of the head of household. All P-EBT households will receive P-EBT benefits on an EBT card. If a household needs a replacement card the client will call FIS at Customer Service for a replacement card and it will be re-issued. All replacement cards will be sent from FIS via the mail. Undeliverable cards will be returned to FIS who will in-turn provide DCF with this information. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. The draw priority will be P-EBT, SNAP, and D-SNAP. P-EBT will draw first priority.

EBT Benefit Issuance

- Sub-benefit type to be used for P-EBT: **EBT25811**
- New Sub-benefit type to be used for Child Care P-EBT: **EBT25812**
- Benefit draw priority: The P-EBT benefits identified as EBT 25811 will be used first ahead of any existing SNAP authorizations or future SNAP authorizations. Kansas will follow the existing State SNAP expungement timelines.

- P-EBT benefits assigned to non-SNAP households will be subject to regular expungement rules.
- LEAs will send a letter that includes the unique identifier to all free and reduced price meal households informing them of the DCF Online Parent Portal. This letter will include instructions for how to use the unique identifier. KSDE will develop a prototype communication that LEAs will send to families in LEAs where there was NOT hybrid or remote learning and thus the family is not eligible for P-EBT. These students will not be assigned a unique identifier. KSDE will also develop a prototype communication for LEAs to send to those families that are eligible because they have had students in remote/hybrid learning environments to explain next steps along with the unique identifier.
- All children that do not receive school P-EBT through auto issuance will have to send a request for P-EBT through the DCF Online Parent Portal. Each household that is directed to the online portal by their school will have a unique identifier to confirm free or reduced-price meals eligibility. To identify 2020-2021 eligible school P-EBT children DCF will implement the DCF Online Parent Portal similar to P-EBT 2019-2020. Each eligible child that did not receive auto issuance to their EBT card will be screened for P-EBT eligibility. There will be a screening tool prior to the school P-EBT application. The tool will ask simple question such as-
 1. Was the child(ren) in your household approved to receive free or reduced priced meals for the 2020-2021 school year?
 - a. If No: The child(ren) in your household is not eligible to receive P-EBT. They must be approved to receive free or reduced priced meals for the 2020-2021 school year in order to receive P-EBT. If you feel the child(ren) in your household may be eligible, contact your local school district for more information. <Process Ends>
 2. What school district does the child in your household attend?
 - a. Non-Approved School District: The child in your household is not eligible to receive P-EBT. Your child's school district has not met the remote or hybrid criteria to qualify for P-EBT. Go here to apply for other DCF services. Is there another child in your home who attends a different district?
 - i. No <Process Ends>
 - ii. Yes <taken back to screen to select school district>
 3. Did the child in the household receive a unique identification code from their school?
 - a. No: You will need a unique identification code for your child in order to apply for P-EBT. The school the child attends is responsible for giving your household this code. Contact the child's school for more information. <Process Ends>
 4. Have you already applied for P-EBT with DCF for the 2020-2021 school year?
 - a. Yes: You do not need to complete another application. Check the status of your application here. <Process Ends>
 5. Have you already received a P-EBT benefit on a Kansas Benefits Card for the 2020-2021 school year?

- a. Yes: The child in your household was automatically enrolled to receive P-EBT. No further steps are needed at this time. You should receive a letter in the mail explaining your benefit amount. If you are not sure if the benefit covers all of the children in your household, or have additional questions, you can call 1-888-369-4777. <Process Ends>
- b. No: We need additional information from your household to determine eligibility for P-EBT. Click the *Start Application* button to continue.

Navigation Buttons:

- Start Application
- Exit

The Application within the DCF Online Parent Portal will ask for the following –

- Eligible Children
 - First Name/Middle Initial/Last Name
 - Date of Birth
 - Gender
 - Social Security Number (Optional)
 - School District
 - Name of School
 - Relationship to Applicant
 - School District
 - Grade during the 2020-2021 school year
 - Unique Identification Code
- Parent/Guardian Information
 - First Name/Middle Initial/Last Name
 - Address – Street/City/County/Zip Code
 - Phone number
 - Date of Birth
 - Gender
 - Social Security Number (Optional)
 - Relationship to Child(ren)
- All requests received from the DCF Online Parent Portal will be manually registered by DCF staff. DCF will then conduct a match test using Kansas Eligibility Enforcement System (KEES). The match test will enable DCF to issue benefits to children that were not able to be auto issued but known to KEES. If a match is not possible an eligibility worker will manually work the case to determine P-EBT eligibility and issue P-EBT benefits if all P-EBT eligibility requirements are met.

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.
- 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.
- 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).
- 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.
- 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)
- 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.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

Disputes or Issuance Errors:

Individuals can reach out directly to Department for Children and Families to dispute their benefit amount or eligibility amount for P-EBT benefits. DCF staff and customer service are equipped to answer P-EBT question and do appropriate case research to assist in resolving any disputes or errors regarding P-EBT benefits. The household maybe asked to provide additional information if DCF is unable to determine if there was an issuance error (for example, documentation of school status from the student’s school, verification of address of the student). Once any necessary information is provided and reviewed, DCF will contact the household to inform them of the final determination.

Access Issues:

Homeless individuals may need to contact DCF to provide an address for receiving their card if they do not already have one. DCF has an integrated eligibility system that includes Foster Children. P-EBT cards will be issued to the head of household not the child. Head of Household without a social security number will follow the same model utilized in the last round of P-EBT. The head of household without a social security number will contact DCF for assistance in setting up a up their card to access the benefits on the EBT card. For individuals that do not have a SSN they must contact their local DCF office to set up an alternate password to activate the EBT account. If a password is necessary, the password is directly entered into ebtEDGE by DCF staff. These individuals can then call and choose a Personal Identification Number (PIN). These instructions are included in a training brochure the client receives with their Kansas Benefits Card. Those with limited English proficiency will be able to speak with a DCF worker using interpreter services. Mailings will be provided in Spanish. Households do not need any kind of internet services to receive P-EBT benefits. Households without internet access may contact by phone to complete the screening tool and a paper application will be mailed to the client if eligible or upon request. Persons with disabilities will be served in the same manner the agency serves SNAP clients that require additional services.

Public Service Campaign:

DCF will conduct a public information campaign to alert those receiving P-EBT benefits and the general public of the purpose of P-EBT and how it is to be used. This will include posting on the Kansas DCF public website, social media, and press releases. KSDE will send P-EBT information to the schools to assist eligible households with questions and concerns.

Information to P-EBT participants:

Both SNAP and non-SNAP households will receive information about P-EBT by a notice of approval for P-EBT, DCF public website, social media or other electronic means. The information shall include the following.

- A description of P-EBT
- Instructions for setting the PIN for the EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e. only purchase food 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 the agency contact information and the DCF website with FAQs
- Phone number for FIS for replacement card requests

Clients who do not wish to receive P-EBT benefits will be provided with information on how to dispose of the card. This information is included with the instructions sent with the card to the household.

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.

Response:

Kansas DCF will make every effort to ensure only households with eligible children are approved for P-EBT benefits.

Any possible benefit over-issuance or improper payments that KS DCF becomes aware of will be investigated and appropriate action will be taken. DCF will investigate the over-issuance or improper payment by checking the information provided by the SFAs, checking the information in KEES and requesting additional information from the household if needed. If it is determined after investigation and research that there was an over-issuance or improper payment a DCF eligibility worker will take the appropriate action to initiate a claim. Examples of an over-issuance or improper payment would be duplicate benefits or issued to the wrong household. DCF will ensure that no additional benefits are issued to an ineligible household for future months. In no instances will Kansas DCF reclaim P-EBT benefits by reducing a household's SNAP benefit. Kansas will not recoup against SNAP benefits already issued.

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.

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.

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

Kansas 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

Kansas 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.

For questions or concerns please contact Kansas Department for Children and Families at 1-888-369-4777. This phone number is where USDA FNS National Office can direct any public inquiries about P-EBT in Kansas.

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



Signature
Laura Howard, Kansas DCF Secretary



Signature

Cheryl Johnson, MS, RD, LD
Director Child Nutrition & Wellness, KSDE

Date of Request: April 14, 2021