

**State Plan for Pandemic EBT
Children in School, 2022-2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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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 children in school during school year (SY) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

Additional context and background for this document can be found at State Guidance on Coronavirus P-EBT: [Click Here](#)

The submission of a P-EBT state plan, associated template, and related reporting obligations are addressed in OMB# 0584-0660, Pandemic Electronic Benefit Transfer (P-EBT), expiration 11/30/2023.

State Plan for Pandemic EBT
Children in School, 2022-2023

1. **State:** California

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

3. **Executive Summary:**

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

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

August 1, 2022 through May 11, 2023.

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

- Estimated amount issued to school children in SNAP households.
- Estimated amount issued to school children in non-SNAP households

Monthly Issuances

August 2022 through May 11, 2023: \$144,000,000 (total number of P-EBT eligible children (1.6 million) multiplied by the proposed benefit of \$90 per month).

Total Issuances

August 2022 through May 2023: \$1,368,000,000 (total number of P-EBT eligible children (1.6 million) multiplied by the proposed benefit of \$90 per month over 9.5 months).

Estimated Grand Total: \$1,368,000,000

- Estimated amount issued to school children in SNAP households is \$342,000,000.
- Estimated amount issued to school children in non-SNAP households is \$1,026,000,000.

¹ The date range covered by P-EBT state plan or amendment. A state's plan will typically cover the instructional months in the state's school year (September 2022 through June 2023, for example).

- c. Estimated total **number** of children to which the state will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households

The estimated total number of school children to which California will issue P-EBT benefits is approximately up to 1.6 million.

- Estimated number of school children in Supplemental Nutrition Assistance Program (SNAP) households is 400,000.
- Estimated number of school children in non-SNAP households is 1,200,000.

- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

P-EBT cards will be mailed in August through December 2023. The CDSS and EBT processor remain committed to issuing as many benefits as possible by September 30, 2023. Under no circumstances will benefits be issued beyond December 31, 2023.

- e. Names of state agencies involved in administering this plan.

The California Department of Education (CDE), in collaboration with county offices of education, local school districts, public schools, non-public schools, and private schools, is responsible for determining P-EBT eligibility for school-aged children.

The California Department of Social Services (CDSS) is responsible for issuing P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, and the provision of customer service and support.

4. P-EBT for School Children (see Q&As #7-25)

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 2022-2023, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2022-2023, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application **and** the school district has not made a new school meal eligibility

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully

virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?¹ 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- 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).
- 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. *(Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)*

Response:

Participating NSLP/SBP Schools

The CDE will create a Free and Reduced-Price Meal (FRPM) list of eligible children enrolled at a Local Education Agency (LEA) for School Year (SY) 2022-23, including state special schools, non-public schools, and private schools approved to operate the National School Lunch Program (NSLP) or School Breakfast Program (SBP). This list will include children enrolled in Transitional Kindergarten through children aged 22 years. CDSS has protocols in place to check for potential duplication and ensure transitional Kindergarten through age 22 children are being correctly identified as part of this plan. For children who are identified as being age 6 or older and attending a NSLP/SBP participating school, they are automatically defaulted to the SY 22-23 school-aged plan and are cross-referenced with the children in the SY 22-23 Young Child plan to verify duplication of benefits is not occurring. Young children under age 6 who are attending school will receive P-EBT benefits

¹ The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

under the childcare plan if they are in a household receiving CalFresh. If the child is not receiving CalFresh, they will be evaluated for eligibility in the school-age plan.

To identify students who are eligible for FRPM, CDE will use participating site data from SY 2022-23. The CDE will identify students attending private schools who are eligible for P-EBT benefits by collecting data directly from private schools in a separate one-time collection developed specifically for this program. Eligible private school students will be added to the FRPM list. The FRPM list will include SNAP-recipient and non-SNAP recipient students.

The CDE will identify FRPM students by identifying those students who have been:

- a. Directly certified or determined “other source categorically eligible” (students who are homeless, migrant, or foster) for SY 2022-23, *or*
- b. Determined eligible for FRPM based on an approved NSLP or SBP application or an Alternative Household Income Form for SY 2022-23, *or*
- c. Enrolled in a Community Eligibility Provision (CEP) school or a school operating under Provisions 2 or 3 for SY 2022-23.

The FRPM list will be based on existing enrollment and FRPM eligibility information maintained in the California Longitudinal Pupil Achievement Data System (CALPADS) and new FRPM eligibility information gathered from private schools.

The LEAs submit enrollment and FRPM eligibility data to CALPADS on an ongoing basis through the year. The CDE will extract data maintained in CALPADS to identify all public school students that are FRPM eligible and enrolled at a public school approved to operate the NSLP or SBP, including all students enrolled at a public school approved to operate a provision. The FRPM list will include students newly enrolled in or transferring into a participating public school, as well as students transferring into a participating provision public school from a non-provision school. The FRPM list will not include students who have graduated in SY 2021-22 or exited a public school and did not re-enroll in a participating school. To complete the FRPM list, the CDE will solicit student level FRPM eligibility data directly from private schools approved to operate the NSLP or SBP.

Independent Study

To identify lack of access to in-person school meals for students included on the FRPM list, CDE will conduct an ad-hoc data collection effort to identify students that are not attending school in-person and are enrolled in Independent Study (IS). The IS program allows students an alternative method to obtain schooling by allowing for virtual learning. In SY 2021-22, State law mandated that LEAs offer IS to students that did not wish to return to in-person instruction due to concerns around COVID-19. The IS requirement expired June 30, 2022; however, IS remained an option at many LEAs as California continued to navigate the pandemic in SY 2022-23. California began collecting IS data exclusively for P-EBT purposes and continued this data collection for SY 2022-23. This data was not collected prior to the pandemic. California proposes to provide P-EBT benefits to IS students that were

enrolled and eligible in IS in **both** SY 2021-22 and SY 2022-23. California will make the simplifying assumption that students who chose IS in SY 2021-22 did so due to concerns over COVID-19 and continued in IS for SY 2022-23 due to those same concerns. This assumption is supported by the fact that the national public health emergency for COVID-19 was still in effect at the start of the 2022-23 SY when students and families were making enrollment and learning modality decisions.

Under the previous SY P-EBT plan, approximately 726,000 eligible enrolled IS students were issued P-EBT benefits. The CDE estimates that 433,000 IS students may be eligible for SY 2022-23 P-EBT. This estimate may be further reduced if students were not free or reduced price eligible or were not reported as IS in SY 2021-22.

The CDE will confirm the total number of days a student attended IS monthly from August 2022 through May 11, 2023. If a student had five or more IS attendance days in any given month in SY 22-23, then all IS attendance days in that month will be considered P-EBT eligible. This data collection will be completed in July 2023 and will request retroactive data to ensure that virtual learning records are finalized at the time of request. California will ensure that IS students receiving SY 2022-23 P-EBT benefits also received P-EBT benefits in SY 2021-22 due to IS. The CDE will conduct a separate data collection for private schools to confirm enrollment in virtual learning due to COVID-19.

In-Person Excused Absence

In addition to collecting IS participation data, California will also request excused absence data in the ad-hoc data collection to identify lack of access to school meals for students attending in person. Excused absence data will be used to confirm lack of access to school meals for students on the FRPM master list who did not attend school in-person (were absent) assumed due to COVID-19 and were not enrolled in IS. California will assume that students who were FRPM eligible did not have access to meals at school on days they were absent. This will apply for public and private schools and for children in SNAP households and non-SNAP households. The CDE will collect excused absence data from private schools, in a separate data collection.

For schools submitting data during the ad-hoc collection, the CDE will consolidate student excused absence data for any students who were FRPM eligible at a participating NSLP or SBP school in SY 2022-23 and not enrolled in IS. Monthly attendance data will be collected from the ad-hoc collection, including the total number of excused absences a student had in each month of SY 2022-23. If a student had five or more absences in any given month in SY 22-23, then all attendance days in that month will be considered P-EBT eligible. As school districts in California utilizes a variety of data systems to record and track absences throughout the state, it was not feasible to confirm consecutive absences in a manner that would allow benefits to be issued in time.

Non-Participating NSLP/SBP Schools

P-EBT 4.0 Application

SY 2022-23 P-EBT eligibility for students attending virtual schools that CDE does not readily have data for or who are homeschooled will be verified via the P-EBT 4.0 Application. This narrow subset includes students who disenrolled from NSLP-participating schools due to concerns about the COVID-19 outbreak after January 27, 2020. The application will collect the data elements needed to determine FRPM eligibility and participation in a NSLP-participating school prior to COVID. The application will require the following information from parents/guardians:

1. Student's last known NSLP-participating school, specifying that the student must have exited the NSLP school after January 27, 2020 to be considered potentially eligible. If no school is chosen, an additional confirmation will be requested asking if student is in grades K-2 or has newly moved to the state after January 27, 2020.
2. The school which the student would attend in-person if they were not enrolled in virtual learning, or homeschooled, to confirm whether the student would attend a CEP/Provision 2 or 3 school.
3. A completed application for FRPM comparable to USDA's prototype school meal application.
4. Attestation of household income and number of individuals living in the household, including attestation that all information entered is true and correct to the best of the parent's/guardian's knowledge.
5. SY 2022-23 private school affidavit number (homeschooled students only) or proof of school enrollment.
6. Confirmation if student is enrolled in virtual learning because of COVID-19.
7. SNAP/TANF case number (if applicable).
8. Proof of student's identity. Acceptable forms of proof include the following:
 - a. Birth certificate
 - b. Immigration or naturalization documents
 - c. Hospital birth record
 - d. Passport
 - e. Tax forms with dependent information

All applications will be sent to the P-EBT Helpline for review and processing. The P-EBT Helpline will utilize a supplementary list of children who exited an NSLP/SBP school after January 27, 2020, provided by CDE. The P-EBT Helpline will verify the applicant student's identity and cross-match the student to the list of students who exited an NSLP/SBP school after January 27, 2020.

Once the student has been confirmed to have exited an NSLP/SBP school after January 27, 2020, the P-EBT Helpline will verify if the student was eligible for SNAP/TANF in SY 2022-23 or would have been attending a CEP/Provision 2 or 3 school. If either is true, the student will be eligible for SY 2022-23 P-EBT benefits. If the student is neither receiving SNAP/TANF nor would not be attending a CEP/Provision 2 or 3 school based on their home address, the P-EBT Helpline will review and process the applicant's meal application. The P-EBT Helpline will reconcile the list of approved applicants, sending the list to CDSS on a regular basis for P-EBT card distribution. All applicants, approved or denied, will be

contacted by the P-EBT Helpline informing them of the application outcome. The application will be posted on California’s P-EBT website, with client education efforts to refer potential applicants to the helpline being conducted by outreach partners and LEAs.

California will verify eligibility based on the following criteria (unless the applicant is confirmed to be directly certified or attending a CEP/Provision 2 or 3 school):

- California will use the documentation provided by households with their applications to verify the eligibility of the first 100 applicants.
- If the error rate for this first 100 is at or below 5 percent, California will review and verify the documentation for 10 percent of remaining applications.
- If at any time, the error rate rises above 5 percent, California will resume verifying the documentation for all applicants.

SY 2022-23 P-EBT Eligibility Verification Summary

SY 2022-23 P-EBT Eligibility Criteria Verification					
	Attends a Participating School	Left a Participating NSLP/SBP School After January 27, 2020 (Presumed Due to COVID)	Free or Reduced Price (F/RP) Eligible or Attends a Community Eligibility Provision (CEP) or Provision 2 School	COVID Related Absences or Independent Study Days of Five or More Days in a Month	Identification as a Person
Information Source					
Participating NSLP/SBP Schools					

Public–in person	Nutrition database and pupil database ¹	N/A	Nutrition database and pupil database	AdHoc data collection	Local ²
Public–independent study	Nutrition database and pupil database	N/A	Nutrition database and pupil database	AdHoc data collection	Local
Private–in person or independent study	Nutrition database	N/A	NSD data collection	NSD data collection	Local

SY 2022-23 Eligibility Criteria Verification

	Attends a Participating School	Left a Participating NSLP/SBP School After January 27, 2020 (Presumed Due to COVID)	Free or Reduced Price (F/RP) Eligible or Attends a Community Eligibility Provision (CEP) or Provision 2 School	COVID Related Absences or Independent Study Days of Five or More Days in a Month	Identification as a Person
Information Source					
Nonparticipating Schools					

¹ Nutrition database (known as CNIPS) contains participating NSLP/SBP sites and CEP/Provision 2 status. The pupil database (known as CALPADS) contains school information, individual f/rp eligibility and student information, such as address.

² Local indicates that the Local Education Agency (LEA), both public and private, verified the student was a person through collection of registration information. For public school students, the LEA then uploads the student registration information into the pupil database and assigns the student a state student identification number. Private schools do not have this requirement. Existing in the pupil database or receiving student eligibility information from a private school is positive affirmation the student is a person.

Public– Virtual	N/A–Self reported as primarily or exclusively virtual in school directory	Pupil database for those that left an NSLP school by June 30, 2021, or attestation from household	Pupil database	Eligible for the total days enrolled in virtual school from August 1, 2022 through May 11, 2023	Local
Private– Virtual	N/A–Self reported as private virtual school in school directory	Pupil database for those that left an NSLP school by June 30, 2021, or attestation from household	Student would attend a CEP/P2 school, or receives SNAP/TANF, or completes f/rp meal application	Eligible for the total days enrolled in private virtual school from August 1, 2022 through May 11, 2023	Collect private school affidavit ³ confirmation number, and one of the following: birth certificate, immigration documents, hospital birth record, tax forms with dependent information, child’s passport.
Homeschool	N/A–Self reported affidavit information on file with CDE	Pupil database for those that left an NSLP school by June 30, 2021, or attestation from household	Student would attend a CEP/P2 school, or receives SNAP/TANF, or completes f/rp meal application	Eligible for the total days enrolled in homeschool from August 1, 2022 through May 11, 2023	Collect private school affidavit confirmation number, and one of the following: birth certificate, tax forms with dependent information, child’s passport.

Simplifying Assumptions

The following simplifying assumptions will be made to confirm student eligibility for SY 2022-23 P-EBT:

1. Students enrolled in IS in SY 2022-23 will be assumed to have enrolled in IS because of COVID-19. Estimates indicate that participation in IS has decreased 44% from SY 2021-22 to SY 2022-23 as students are going back to in-person learning. However, a contingent of California students are still enrolled in IS given high COVID-case counts prevalent through summer 2022.

³ Private schools are required to complete a private school affidavit, which contains information about the school. Private schools of less than 6 students are considered homeschool. Thus, the affidavit requirement is extended to homeschooled households.

2. If a student had an excused absence for five school days or more in a month, the State will assume that the absences were related to COVID-19 and consider the student's absences in that month as P-EBT eligible days. California is proposing to use five excused absence days for this assumption based on the [California Department of Public Health COVID-19 Public Health Guidance for K-12 Schools in California, 2022-2023 School Year](#). The guidance advises that five days is the minimum quarantine period for unvaccinated students who are close contacts of a positive case and later test negative in five days. Otherwise, close contact students must quarantine for 10 days. As California is collecting absence data through the modification of existing reports, the State proposes to use total absences in a month as a simplifying assumption to determine P-EBT eligible days and streamline eligibility identification. This is because the State and LEAs do not track whether individual absence days are related to COVID-19 and gathering this additional data would lead to a severe delay in benefit issuances.
3. California assumes that virtual and homeschool students living in a CEP/Provision 2 or 3 area are automatically FRPM eligible. This will be based on the 2022-2023 CEP/Provision 2 or 3 designation of the school they would currently be attending. The P-EBT Helpline will utilize a supplementary list of all CEP/Provision 2 or 3 schools in the State to confirm if the applicant's assigned school is on the list.
4. California will assume all private schools with less than six enrolled students are homeschools. The State does not track homeschooled students in any database but homeschools must enroll as private schools and submit a private school affidavit confirming they are a private school. Homeschools receive a private school confirmation number upon submitting the affidavit, which is kept confidential. The P-EBT Helpline will match the affidavit confirmation number provided by applicants with a supplementary list of affidavit confirmation numbers of all private schools in the State with less than six enrolled students.
5. California will make the simplifying assumption that eligible children who attended an NSLP-participating school and enrolled in a fully virtual institution or began homeschooling between the January 27, 2020 start of the PHE through school year 2020-2021 did so due to concerns about COVID.

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.

B. School Status

- 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.
- 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?
- 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.)
- 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.

Response:

California will confirm reduced attendance for individual schools by utilizing the IS enrollment information and student absence data defined in the *Eligible Children* section. Enrollment in an IS program is a formalized, contractual agreement that is available to parents/guardians who choose not to enroll their children in in-person learning over concerns of COVID-19. The IS program is offered to allow students to learn from home for a sustained uninterrupted period. As such, a change in educational mode from at-home learning to in-person learning within a five-day period is very unlikely. California proposes to assume that any student enrolled in IS will not be attending school in-person for at least a five consecutive day period. Therefore, California proposes to assume that any schools with students enrolled in IS are operating at reduced in-person attendance for at least five consecutive days. Issuing benefits retroactively, rather than prospectively, removes the need to ensure there are no changes in status before benefits are issued.

5. 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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

Notes:

1. Lunch rates include the 8 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
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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:

Students will be issued benefits equal to the daily federal reimbursement rate of \$8.18 for a breakfast, lunch, and snack for SY 2022-23, as specified by USDA. The benefit is multiplied by the number of school days that the eligible child did not receive a free or reduced-price meal at the school due to the school's closure or reduced attendance or hours. California will determine benefit amounts using individual days students were receiving instruction through IS, and for students attending school in-person, using excused absences of five or more in a month. The individualized benefit amount will be based on the total number of days a student was enrolled in IS or not enrolled in IS but absent from school presumed due to COVID-19 related reasons.

Students determined P-EBT eligible via the application process will receive benefits of 18 school days per month (except May 2023, which will be nine school days) in the school year based on California's SY 2022-23 school calendar. Benefits will be provided on a monthly basis according to the issuance schedule for NSLP participating students. There will be two benefit levels based on whether the student was enrolled in IS or not enrolled in IS but had five or more excused absences in a month in SY 2022-23:

1. Students enrolled in IS (public schools and private schools): Benefits will be based on the number of school days greater than five in a month that the student was receiving instruction through IS. This will confirm the student's P-EBT eligible days. The CDSS will multiply the P-EBT eligible days in each issuance period by the daily rate (\$8.18) to calculate the benefit amount. A maximum of one benefit issuance will be delivered for SY 2022-23.

2. Students not enrolled in IS (public schools and private schools): Benefits will be based on the number of excused absence days in each month of SY 2022-23. California proposes to issue benefits in any month in SY 2022-23 where a student was absent for greater than or equal to five school days. All total absence days in a month greater than five will be considered P-EBT eligible days as consecutive absence data is not readily available. The CDSS will multiply the P-EBT eligible days in each issuance period by the daily rate (\$8.18) to calculate the benefit amount. A maximum of one benefit issuance will be delivered for SY 2022-23. Absence data will be collected via the ad-hoc data collection or direct school contact.
3. P-EBT Applicants: Students considered eligible via the P-EBT 4.0 Application will be eligible for all school days they were not attending a participating school in SY 2022-23. California has calculated 171 school days based on assuming 18 school days/month for the months of August 2022 through April 2023, plus an additional nine school days for May 2023.
4. Students that missed fewer than five days due to COVID: Households may apply by contacting the helpline. Benefits will be based on the number of days they attest to being absent due to COVID if all other eligibility criteria are met.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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 past years, 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 P-EBT issuances for previous school years. 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.
- 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:

Benefit Issuance Schedule

The SY 2022-23 P-EBT cards for school children will be mailed over the course of two months (depending on the number of eligible children). As such, benefit issuances will be naturally staggered based on when cards reach eligible families. This approach will ensure that P-EBT benefit issuance does not overburden the State’s EBT retailer or existing EBT infrastructure, including the California EBT customer service center.

The feasibility of this timeline depends on the date of plan approval. The State may need to change the issuance schedule depending on when the plan is approved. The tentative timeline is as follows:

Post-Plan Approval

- May 15 to May 31, 2023: Development of SY 2022-23 ad-hoc data collection tool, communications and training.
- June 1 to June 30, 2023: Ad-hoc data collection period for SY 2022-23.
- July 21 to August 15, 2023: P-EBT 4.0 Application collection period.
- July 21 to July 31, 2023: P-EBT eligible list via ad-hoc data collection for SY 2022-23 finalized.
- July 21 to September 15, 2023: P-EBT 4.0 Applications regularly reviewed, processed, and transferred to EBT processor.
- August 1 to August 10, 2023: P-EBT data via ad-hoc data collection prepped for and transferred to EBT processor.
- August 15 to September 15, 2023: P-EBT card mailing for benefit months August 2022 through May 11, 2023.
- September 16, 2023 to December 31, 2023: P-EBT card mailing for benefits that could not be determined prior to September 15, 2023.

The card mailing dates for children who have applied and are found eligible is dependent upon approval of this plan, and as such is subject to change. The State reserves the September 16,

2023 through December 31, 2023 timeframe to complete card mailing and income verification for this population. In addition, this time period will be used to issue benefits to students that may have been inadvertently missed because LEAs did not submit required info for benefits.

EBT Processing & Benefit Issuance

California will issue P-EBT benefits on dedicated P-EBT cards for all P-EBT recipients. All children, including those previously issued a P-EBT card and those that are newly eligible, will receive benefits on a newly issued card. The newly issued P-EBT card will be distinguishable as a “P-EBT 4.0” card. All P-EBT cards will be issued in the name of the eligible child and each child will receive their own P-EBT card.

P-EBT cards will be mailed to the mailing address maintained by schools that is in effect on the day the data is extracted from CALPADS or the mailing address provided by families who are approved via the P-EBT 4.0 Application. The CDE will inform LEAs to populate either the school or district address for any student records where no address is available, such as for students experiencing homelessness or otherwise having no permanent address. Undeliverable cards will be deactivated by the EBT vendor. Families may contact the P-EBT Helpline to request that a new card be mailed to the corrected address. All requests for replacement cards will also be handled by the P-EBT Helpline. Expanded P-EBT Helpline capacity will ensure that address change and card replacement requests can be processed timely.

P-EBT benefits will be distinguished from regular SNAP benefits via the use of a dedicated P-EBT benefit type. Because P-EBT benefits will be issued via a dedicated card and benefit type, there will be no draw/spend relationship between P-EBT, SNAP benefits, and Disaster SNAP benefits.

P-EBT benefits will be subject to a 365 day expungement. This is necessary given that some families who are automatically confirmed as eligible may not be aware of their P-EBT eligibility or that they received a P-EBT card. P-EBT cards will not become dormant at 180 days. This exception is warranted because P-EBT families will not be issued a dormancy notice. Removing dormancy balances the need for client access and the administrative burden associated with requests for card reactivation processed by the P-EBT Helpline.

7. 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.

To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -

- 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 and caregivers 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 over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - 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:

Client Education and Communications Campaign

California will take a multi-faceted approach to ensuring robust and accurate communication to all eligible households by launching a public information campaign through the length of the State's P-EBT operation to reach both the general public and P-EBT eligible families directly.

General communications strategies will include a dedicated P-EBT website and wide range of media, as well as resources for partners including schools and community-based organizations to engage in client education. Resources include flyers, fact sheets, communication templates, and informational videos. The P-EBT website and materials will be available in multiple languages (including English, Spanish, Vietnamese, Mandarin, Arabic, Cantonese, Tagalog, Korean, Punjabi, Russian, Farsi, and Armenian), reflecting the primary languages spoken at home by the California student population; and the corresponding media strategies will also be multilingual. The website will be Americans with Disabilities Act (ADA) compliant. Paid media will include digital (connected TV, YouTube, Steaming Audio) paid search, and paid social media (Facebook, Instagram). Partner materials will include flyers, template text/email language and sample social media posts and graphics in multiple languages. These outreach materials will be shared broadly with schools and community organizations.

California will issue a direct mail communication to P-EBT eligible families who are automatically confirmed as eligible. This will include both SNAP and non-SNAP households. P-EBT eligible families will receive a flyer that will provide general information and direct them to the P-EBT website for more information. The flyer will include an explanation of P-EBT, eligibility for the program, and updates on implementation and issuance timelines.

A notice will also be sent with each P-EBT card and will include information about how to check balances, how to request a replacement card, how to use P-EBT benefits, where P-EBT can be used, who to contact for questions, and how to opt out if they do not want P-EBT benefits. The mailer will also include details on where to go for step-by-step instructions on how to PIN your P-EBT card. Families will also be advised that P-EBT benefits are non-transferable. The information notice will be available in English and Spanish and will be accompanied by language assistance information.

P-EBT Helpline

The P-EBT Helpline will serve as first line customer support. To support P-EBT eligible families, California has significantly expanded its P-EBT Helpline capacity. Tier I P-EBT Helpline agents will assist callers with general information, PIN set-up, address changes, and card replacements.

More complicated calls that cannot be resolved by Tier I P-EBT Helpline agents will be addressed by Tier II P-EBT Helpline agents. Tier II P-EBT agents will have more in-depth knowledge of P-EBT eligibility, including the number of P-EBT eligible days used to determine benefit amounts. Both Tier I and Tier II P-EBT Helpline agents will be able to access language line support as needed to provide service in languages other than English. Neither Tier I nor Tier II P-EBT Helpline agents will be able to determine P-EBT eligibility.

Additionally, California has implemented a live chat feature on its P-EBT website. The live chat feature will be an additional avenue for families to receive P-EBT customer service. The P-EBT Tier II helpline agents will staff the P-EBT Live Chat. Helpline agents will assist families through the live chat by providing answers to general P-EBT questions, including questions related to PIN setup, providing eligibility details, where and how to use the P-EBT card, etc.

The P-EBT Live Chat will also be utilized to issue card replacements or process address changes. For inquiries in the P-EBT Live Chat related to card replacements or address changes, the user will be asked to provide the child's name, date of birth, and current mailing address prior to entering the chat. For address changes, the new mailing address will also be requested. Once the user enters their verification information in the pre-engagement form, they will be admitted into a chat with a live P-EBT customer service agent to process the change request. Verification information will not appear in the chat box itself once the client has entered their information in the pre-engagement form. No personally identifying information will be exchanged through the chat box itself. All chat and pre-engagement form logs will be deleted after 30 days to provide sufficient time for quality assurance reviews.

The P-EBT Helpline will also serve as the dedicated source for responding to inquiries related to incorrect benefits and denied eligibility. The P-EBT Helpline will investigate each case and provide the caller with additional information as to the result of the student's eligibility/benefit outcome.

P-EBT Appeals Process

To ensure that all eligible children receive P-EBT benefits, California will implement an appeal process for students who were not initially identified as eligible for SY 2022-23 P-EBT or who were unable to attend school due to COVID-19 for days that were not initially identified through the ad-hoc data collection. The appeal process would function as a part of the P-EBT Helpline, with dedicated staff to process appeals. The P-EBT Helpline will utilize a list of students eligible for FRPM in SY 2022-23 and a separate list of schools participating in NSLP, SBP, CEP, and Provisions. Both lists will be provided by the CDE based on information available in CALPADS and the California Nutrition Information and Payment System (CNIPS). The helpline will also have access to eligible students' number of excused absence days as received through the ad-hoc data collection.

Helpline staff will confirm if the appealing student is eligible for FRPM, was attending a participating school, and whether the student had any excused absences in the SY that they did not receive P-EBT benefits for. The Helpline will be able to view a monthly breakdown

of excused absences for students whose data was received through the ad-hoc tool. The parent/guardian will verify the number of days the student was unable to attend school in-person in SY 2022-23 due to COVID-19. The California P-EBT Plan SY 2022-23 helpline will inform parents/guardians as to what qualifies as a P-EBT eligible day. Specifically, they will communicate that P-EBT for SY 2022-23 is only available for COVID-19 related absences or virtual learning days. As part of the appeal process, parents/guardians will provide the following information:

Exact dates that the student did not attend school in-person because they were absent from school due to COVID related reason,
school name and location,
student name,
student date of birth,
mailing address,
email address,
and phone number.

There are instances where eligible students are enrolled in schools that do not show as participating in NSLP or SBP but who receive their meals at another site that is participating in NSLP or SBP. In these cases, California proposes that the P-EBT helpline accept client attestation of FRPM eligibility if the site where meals are consumed (and is participating in NSLP or SBP) differs from the school where the student is enrolled. The following message will be communicated to callers to attest to the accuracy of the information they provide:

“Do you certify (promise) that all information on this application is true and that the dates specified in the application are days that the child was attending school on an independent contract or was attending school in-person but was absent for a school-approved COVID-related reason. Do you understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. Are you aware that if you purposely give false information, your children may lose meal benefits, and you may be prosecuted under applicable State and Federal laws?”

The Helpline will not approve P-EBT eligible days greater than the amount shown in the student’s excused absence record. The P-EBT Helpline will follow up with all appeals with either an approval or denial notice. If applicable, the notice will explain why SY 2021-22 P-EBT benefits were denied.

Accessibility

The CDSS and CDE are committed to equitable access for all eligible families regardless of their circumstances. To serve households with limited English proficiency, California’s P-EBT plan includes access to information in languages other than English. To serve children without a social security number (SSN), P-EBT PIN set-up does not require an SSN. To serve households without internet access, California has included in this plan direct mail to P-EBT eligible families and has increased the P-EBT Helpline’s capacity to provide general program info. To serve people with disabilities, P-EBT information will be provided in simple, direct and user-friendly language and the P-EBT website will be ADA compliant.

While P-EBT cards must be received by mail, California will offer options to assist families that may lack a permanent residence address. More specifically, P-EBT eligible families may request that their P-EBT card be sent to a residence or commercial address, P.O. Box address, or general delivery. County human service agencies may also receive P-EBT cards on behalf of P-EBT eligible families experiencing homelessness.

8. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.

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

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

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

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

Response:

Due to the scale of California's P-EBT operation, California's plan proposes reducing the number of issuances. These measures will inherently eliminate the most common sources of issuance errors. Additionally, all P-EBT eligible children will be assigned a unique identifier. This unique identifier will be used throughout the data match process to ensure individual children are only issued P-EBT benefits once for each month the child is determined P-EBT eligible. The unique identifier will be used by the CDE, CDSS, and California's EBT vendor to review P-EBT data for potential duplicates at various points in the data match and benefit issuance process.

The State will contact USDA whenever it identifies an issuance error via the standardized over-issuance template provided by USDA. Further, the State will provide a description of the error, the number of children involved, the value of the over-issuance, and corrective actions taken or will be taken to prevent recurrence of the problem. The State may correct errors in P-EBT issuances in appropriate circumstances. The State commits to contacting FNS prior to recovering any P-EBT benefits.

9. 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.

10. 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, 2022 through September, 30 2023. 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.

11. 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.”

12. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

13. Administration of State P-EBT Plan


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

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


Andrea Brayboy (Jul 14, 2023 13:28 PDT)

Andrea Brayboy, Branch Chief
CalFresh Policy and Nutrition Branch
California Department of Social Services

Kim Frinzell

 Digitally signed by Kim Frinzell
Date: 2023.07.14 13:31:01 -07'00'

Kim Frinzell, Director
Nutrition Services Division
California Department of Education

Date of Request: Jul 17, 2023

Signature: 
Andrea Brayboy (Jul 14, 2023 13:28 PDT)

Email: Andrea.Brayboy@dss.ca.gov

Title: Chief, CalFresh and Nutrition Branch

Company: STATE OF CALIFORNIA DEPARTMENT OF SOCIAL