

**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
Document ID:	
Z-RIN:	
Date of Issuance:	January 29, 2021
Replaces:	N/A
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:** Connecticut
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* 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.

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Response:

Connecticut proposes to amend its currently approved P-EBT plan for the 2020-2021 school year covering the period of September 1, 2020 – September 30, 2021 to extend eligibility to children under six who have will not receive P-EBT benefits and who meet the following criteria:

- Is a member of a household where at least one member received SNAP benefits at any time since October 1, 2020;

- Is enrolled in a covered child care facility¹; and
- The covered child care facility is closed or has 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 child care facility, or in the area of the child’s residence, is closed or has reduced attendance or hours for at least 5 consecutive days.

The Connecticut Department of Social Services (CT DSS), using recipient data from CY 2021 estimates that there are approximately 43,026 children who are eligible for P-EBT child care benefits. The State commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

Using this number as its basis, CT DSS worked with the Connecticut State Department of Education (CSDE) to determine the predominate learning model of all students in Connecticut for each month of this proposal which informs the basis of the benefit amount provided to child care students.

Using the three P-EBT benefit amounts approved in the State’s P-EBT plan, Fully Remote, Mostly Remote, and Hybrid, as well as the approved benefit amounts associated with each, Connecticut estimates the following figures associated with approval of this amendment:

Benefit Month	Predominate Learning Model	Associated P-EBT Benefit Amount	Total Estimated Benefits
October 2020	Fully Remote – 42% of students learning remotely	\$122.76	\$5,281,871.76
November 2020	Fully Remote – 42.52% of students learning remotely	\$122.76	\$5,281,871.76
December 2020	Fully Remote – 55.55% of students learning remotely	\$122.76	\$5,281,871.76
January 2021	Mostly Remote – 43.27% of students learning remotely	\$88.66	\$3,814,685.16
February 2021	Mostly Remote	\$88.66	\$3,814,685.16
March 2021	Mostly Remote	\$88.66	\$3,814,685.16
April 2021	Mostly Remote	\$88.66	\$3,814,685.16
May 2021	Mostly Remote	\$88.66	\$3,814,685.16
June 2021	Hybrid	\$34.10	\$1,467,186.60
Total Benefits Distributed			\$36,386,227.68

¹ “Under the latest amendment to the FFCRA, all children under the age of 6 will be considered enrolled in a covered child care facility” - FNS Guidance P-EBT Q&A – **P-EBT Assistance for Children in Schools and Child Care**; January 29, 2021.

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

Response:

The State of Connecticut Office of Early Childhood (OEC) is the state agency responsible for the oversight of a network of programs and services that help you children from birth into grade school and their families. This includes the inspection and licensing of child care programs and facilities.

As a result of the COVID-19 Public Health Emergency, the Commissioner of OEC released a series of [memos](#) beginning March 3, 2020 and culminating with a comprehensive guide for centers and group child care homes and family child care homes during the emergency statewide issued May 29, 2020. These guides, [“Guidance For Child Care”](#) and “Guidance for Family Child Care Homes” during COVID-19, cover such topics as:

- Classroom Group Size
- Social distancing
- Health screenings
- Cleaning and disinfecting

Consequently, all child care facilities have met the required “5 consecutive days” criteria.

Additionally, on September 4, 2020, Governor Ned Lamont issued [Executive Order No. 9](#), directing the Commissioner of Education and Commissioner of Early Childhood, in consultation with the Commissioner of Public Health, to issue binding guidance, rules, or orders to promote the safety of adults and children in public schools and child care settings, including camps, in response to the COVID-19 pandemic or its effects.

As a result of that executive order, a [memo](#) with requirements was released to providers of services to young children statewide including but not limited to child care centers, group child care homes, family child care homes, youth camps, and child care facilities that are exempt from licensing requirements. These different directives all include two elements that directly result in “reduced attendance or hours” in child care centers:

- A reduction in the group size of students, with expanded reductions for infants and toddlers, allowed in a space in the facility as a result in the increased minimum square foot per child requirement has impacted enrollment limits, subsequently reducing attendance; and
- Prohibitions on mixing or combining of groups of children within a child care center as well as requiring staff to social distance throughout the day reduces staffing flexibility and has limited hours of operation for programs. This is done through:
 - Minimizing the number of transitions between groups for children and adults
 - Establishing cohorts of children and staff that remain together across the day
 - Planning activities that maintain physical distance between children whenever possible
 - Ensuring that staff maintain physical distance of 6’ between each other throughout the day as possible

Implementation of these statewide public health requirements confirms all child care centers, statewide, meet the minimum P-EBT eligibility requirements. Therefore, the State intends to certify all children under six who are or were a member of a household that received SNAP benefits at any time since October 1, 2020 as eligible for P-EBT.

The State will determine and confirm a child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements by issuing SNAP benefits through the CT DSS ImpaCT eligibility system as this system is already in compliance.

DSS will be responsible to work collaboratively with OEC to ensure the limit on group sizes of

children in child care facilities throughout the state, which in effect limits the number of children each facility can care for due to staff to child ratios remains in place statewide as this allows for statewide P-EBT eligibility. Should this requirement be removed, DSS will work in conjunction with OEC and CSDE to determine if guidelines remain in place in specific areas statewide, or if P-EBT eligibility for children in child care settings may be conferred through the use of school or school district learning models.

DSS will also be responsible for working with CSDE to monitor monthly predominate learning mode P-EBT school aged children are enrolled in and to use this data to determine benefit amounts (see details in the Benefit Level section).

CSDE, in accordance with Connecticut's previously approved P-EBT plan, is responsible for collecting and analyzing school attendance and learning model enrollment information for school aged P-EBT recipients. This data will be used to ensure that the correct P-EBT benefit amount is provided to non-school children in child care (see details in the Benefit Level section).

In addition, As the data pull will occur after the SNAP monthly issuances, DSS will ensure that a child's eligibility for P-ET benefits ends when a child's SNAP enrollment ends. For example, if a child receives SNAP benefits for the months of October 2020 – March 2021, this child will only receive P-EBT benefits for those same months. DSS will also utilize simplifying assumptions to provide benefits for children that were 5 years old on October 1, 2020, but have since turned 6 years old receive benefits for all months that that remain SNAP participants through the end of the current school year assuming they have not already receive P-EBT benefits through P-EBT for school children.

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:

Connecticut will build off its approved P-EBT plan for the 2020-2021 school year which approved the use of three P-EBT benefit amounts, to determine the correct P-EBT benefit for children in child care:

- **Monthly fully remote benefit amount: \$122.76 (\$6.82 x 18 days)**
- **Monthly mostly remote benefit amount: \$88.66 (\$6.82 x 13 days)**
- **Monthly hybrid benefit amount: \$34.10 (\$6.82 x 5 days).**

For non-school children in child care, the State proposes establishing the monthly P-EBT benefit amount based on the predominate learning mode of school aged children for that month. For example, if most of the school aged children receiving P-EBT are enrolled in a hybrid learning model then all non-school children in child care would be eligible for a hybrid benefit amount. This approach allows for the most accurate representation of school closures across the state, builds off data readily available to DSS and naturally builds in the necessary flexibility to account for changing circumstances.

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:

Connecticut currently plans to retroactively issue October 2020 – June 2021 P-EBT Childcare benefits on July 17, 2021 and then monthly thereafter.

As with P-EBT benefits for school children, the state may need to change the issuance schedule depending on when the plan is approved as well as other currently unanticipated technical challenges. The tentative approach is as follows:

May 24 – May 28 – System design changes and requirements finalized
June 1 – June 7 – Finalize extract of eligible households
June 14 – June 25 – Development of system changes
June 28 – June 29 – database change executed
June 30 – July 16 – system integration and user acceptance testing completed
July 17 – Benefits distributed

Note: schedule is subject to change based upon approval date, system development, testing and sign-off.

The state will continue its use of the SNAP subaccount code of 9002 for SNAP households which was specifically created for the separate tracking and payment of P-EBT benefits and differ from our SNAP and D-SNAP subaccount coding.

As with our previous submission, P-EBT will be given the highest spend priority amongst all benefit types to ensure it is used during the period for which it was intended. In addition, P-EBT benefits will follow the same expungement rules that the state follows for SNAP.

The state intends to follow the same distribution model used in previous iterations of P-EBT. DSS SNAP P-EBT childcare benefits on their pre-existing ConneCT EBT cards. To reduce costs and timeline for implementation, Connecticut will use the normal DSS SNAP EBT card design and will not be issuing a unique card for P-EBT childcare benefits.

For families whose card has been lost, damaged, or was not received, DSS will replicate the prior process for handling requests via its Benefit Center assistance line. DSS households whose card was not received or was lost or damaged will be have a replacement card issued via standard replacement card processes in the ImpaCT eligibility system. These new cards are issued daily.

