

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023**

Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 **without** a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.

1. State: District of Columbia

2. Primary Citation: Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

a. Estimated total amount of P-EBT benefits the state will issue within this amendment's date range. (Consult the appropriate table in Section 4, "Benefit Levels.")

- Estimated amount issued to school children
- Estimated amount issued to non-school children in child care

b. Estimated total number of children to which the state will issue P-EBT benefits.

- Estimated number of school children
- Estimated number of non-school children in child care

c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.

- School children
- Children in child care
 - Please provide tentative issuance dates for the *potential* benefit for children in child care. Note: USDA will release additional guidance before the start of the summer to confirm the availability and finalize the value of the summer 2023 P-EBT benefit for children in child care.

d. Names of state agencies involved in administering this plan.

Response:

Parts A & B

The following table contains the estimated total amount of P-EBT benefits the District will issue. This table assumes the Public Health Emergency (PHE) will terminate as planned, on May 11, 2023.

Flat Summer Rate		
\$120		
	Estimated # of Children	Estimated Total Payment
School Children	68,000	\$8,160,000
Children in Childcare	0	\$0
Total	68,000	8,160,000

- Estimated total amount of P-EBT benefits: \$8,160,000
- Estimated amount issued to school children: \$8,160,000
- Estimated amount issued to non-school children in child care: \$0
- Estimated total number of children to which the District will issue benefits: 68,000
- Estimated number of school children: 68,000
- Estimated number of non-school children in child care: 0

Part C

The District of Columbia proposes the following milestones for a tentative P-EBT issuance schedule:

March 2023:

- P-EBT SY 22-23 Summer plan submission

April 2023:

- Summer P-EBT plan approval

June 2023:

- DHS issues child care P-EBT benefits for August 2022- May 2023
- FARM application closes for SY 22-23

July 2023

- DHS receives data from OSSE
- DHS will use the established web form to address discrepancies regarding the household mailing address, child's information, parent/guardian information, etc. and then issue corrective payments until September 30, 2023.
- DHS issues schoolchild population Summer P-EBT benefits for SY22-23

July - September 2023:

- Issue clean-up file and reconcile cases that are appealed from households that state that they did not receive P-EBT benefits but should have been eligible. DHS will issue corrective payment benefits ongoing to resolve any discrepancies and submitted issues.
- DHS continues to use the established web form to address issues reported by parent/guardians and issue corrective payments until September 25, 2023.
- DHS issues a final corrective payment prior to program end on September 30 and removes all staff from the P-EBT allocation.

Part D

DC's Department of Human Services (DHS) and Office of the State Superintendent of Education (OSSE) are the state agencies administering this plan.

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

- Describe how the state will ensure that households with children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

Response: The District will identify school children who were eligible for free or reduced-price school meals under the NSLP and SBP in SY 22-23 by reviewing the last month of available student data. This will include all children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in SY 22-23, as well as children who were directly certified for free school meals or certified by application for free and reduced-price meals.

To issue benefits for children who became eligible over the summer, the District will run an eligibility match in the Student Information System (SIS) in the first half of July. Students can only become eligible for P-EBT if they had been enrolled in the previous school year, since this summer benefit is an extension of SY 22-23. Additionally, only students who attended an NSLP-participating school in the District in the last month of SY 22-23 will be eligible for P-EBT benefits. The application period for Summer P-EBT will be defined as children who apply and are approved for FARM on or before June 30, 2023 and are approved and updated in the SIS before July 15, 2023. A strict deadline will be communicated with residents so they have an understanding that FARM applications must be submitted to their respective schools and approved on or before June 30, 2023.

Additionally, OSSE Leaders will be informed that all FARM applications must be approved and updated in the SIS before July 15, 2023, to enable DHS to issue P-EBT benefits during the second half of July. In this way, the District will be able to issue summer P-EBT benefits to as many eligible students as possible to meet the disbursement deadline of end of September 2023.

5. Summer P-EBT for children in child care:

- Describe how the state will identify children under age 6 who are enrolled in SNAP during the covered summer period.
- Describe how the state will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period.

Response:

The District will not be issuing Summer P-EBT for children in child care due to the May 11, 2023 end of the PHE, causing this population to no longer be eligible to receive benefits through the Summer P-EBT program.

6. Benefit Levels

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	\$188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Marina Islands	\$139

(USDA will provide additional guidance at a later date on pro-rated summer child care benefits in the event that the PHE extends into the summer months but ends prior to the end of the summer.)

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 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.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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:

March 2023:

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June 2023:

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- DHS will use the established web form to address discrepancies regarding the household mailing address, child's information, parent/guardian information, etc. and then issue corrective payments until September 30, 2023.
- DHS issues schoolchild population Summer P-EBT benefits for SY22-23

July - September 2023:

- Issue clean-up file and reconcile cases that are appealed from households that state that they did not receive P-EBT benefits but should have been eligible. DHS will issue corrective payment benefits ongoing to resolve any discrepancies and submitted issues.
- DHS continues to use the established web form to address issues reported by parent/guardians and issue corrective payments until September 25, 2023.
- DHS issues a final corrective payment prior to program end on September 30 and removes all staff from the P-EBT allocation.

Additional information:

- DHS will consider adjusting clean-up issuances depending on the time frame needed to review the clean-up file and complete the appeals process with households.
- DHS will involve all relevant stakeholders as the P-EBT plan is revised, approved, and implemented.
- DHS will notify all stakeholders if there is a delay, discrepancy, or unforeseen circumstances in the implementation of the P-EBT program.
- DHS will also contact FNS if there is a delay, discrepancy, or unforeseen circumstance in the implementation of the proposed issuance schedule.
- The District will not issue P-EBT benefits on a unique P-EBT card design. All childcare benefits will be added to the household's existing SNAP EBT account.
- The District will use a separate benefit type for P-EBT benefits, a sub-benefit that is distinct from SNAP and D-SNAP.

- All P-EBT benefits will be added to the household's existing, SNAP EBT account. The benefit draw/spend priority will be "First In, First Out".
- Unused P-EBT benefits on the EBT card will be expunged after 274 of non-usage. This is the same expungement rule as regular SNAP benefits.
- DHS will not issue new P-EBT cards to existing P-EBT households. However, in the event that an existing P-EBT household needs a new card issued, such as their existing EBT card is lost, stolen, or destroyed, these customers are instructed to follow normal procedures for requesting a new EBT card.

8. Customer Service

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- 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 to 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:

- DHS will establish a contract-based Customer Service Unit to resolve disputes or issuance errors of P-EBT benefits.
 - Customers will file claims online via the existing online complaint form. Upon the report of a dispute, The Customer Service Unit will research the dispute, the EBT benefit issuance (if applicable) and determine if the dispute is valid or invalid.

- If the nature of the dispute involves SNAP case data or school enrollment data, the issue will be escalated to a second tier of Merit Staff who can resolve the issue.
 - The parent/guardian will be contacted by telephone with the resolution of the dispute.
 - If the disputes become excessive, DHS will designate additional, experienced staff members to address the disputes before September 25, 2023.
 - On September 25, 2023, the webform will close for final issue submissions and no more issues will be accepted after that date. This will be the latest date that the District can keep the webform open in order to issue any remaining benefits by September 30. This date will be well-publicized to ensure that families have plenty of advanced notice.
- DHS will assist vulnerable groups and/or households that express having challenges or issues with accessing P-EBT or P-EBT program information. Limited English Proficiency (LEP) households may view the District’s webform in multiple languages, and will receive notices and calls in multiple languages.
- DHS and OSSE will issue a joint press release to announce the P-EBT to the public in order to inform parents, guardians, and the general public of program details and eligibility criteria.
 - The press release will include the current P-EBT program information.
 - DHS will update the DHS website description of the P-EBT program and eligibility criteria and include a link to the web form.
 - DHS will ensure the website information and web form is available in multiple languages.
 - DHS will ensure that the PHE end-date of May 11, 2023 and its implications are highly publicized to ensure parents are informed.
- For current SNAP and P-EBT recipients, DHS plans to issue P-EBT benefits on the household's existing SNAP EBT card. However, if a parent/guardian does not want the P-EBT benefits, we will inform them that P-EBT benefits are not transferable, they are not required to use the P-EBT benefit, but we are also not able to redirect these funds to someone else. We will also inform them that if they choose not to use the benefits, they will be expunged after 274 days of non-use. Alternatively, they may destroy their card.
- For information provided directly to P-EBT customers, DHS will issue robo calls and a mailed notice when a P-EBT payment is made. Mailed notices include general information such as P-EBT program information, EBT card activation, instructions for choosing a PIN number, an explanation that benefits are non-transferrable, violations and penalties, instructions for destroying the card, and our website address for additional information. The EBT (FIS) customer service number and website will be located on the EBT card. Additional information will be provided by DHS through mass text messaging, website, and written announcements. Frequently asked questions and a link to our webform for further assistance are included on the DHS website.

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

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: DHS will make all reasonable efforts to detect over-issuances and improper payments. These efforts will include using established methods and channels to receive tips, complaints, and referrals regarding P-EBT activity.

DHS will contact FNS for additional guidance prior to taking any action when an over issuance or invalid payment is discovered and will fill out the FNS-provided required spreadsheet to track over issuances. DHS will describe the nature of the error, the number of children involved, the dollar value of the error, and the recommended action by the agency. The spreadsheet will include a thorough explanation of the corrective action that the District will take to prevent recurrence of the error, in addition to the aforementioned data.

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, FNS 388, and FNS 778 reports, on a timely basis in accordance with requirements.

The District of Columbia acknowledges the above statement regarding benefit issuance reporting.

11. Administrative Funding

A separate grant to cover state level administrative costs associated with the administration of P-EBT will be awarded to the SNAP state agency within each state. 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 10 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

The District of Columbia acknowledges the above statement regarding benefit Administrative Funding.

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: “Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

The District of Columbia acknowledges the above statement regarding release of information.

13. 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.

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

14. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:

Signature

Print Name and Title

Date of Request