

**State Plan for Pandemic EBT: Children in School  
School Year 2020-2021**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

*Additional context and background for this document can be found at:*  
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

**State Plan for Pandemic EBT: Children in School**  
**School Year 2020-2021**

1. State: Illinois
2. Primary Citations: Families First Coronavirus Response Act;  
Continuing Appropriations Act, 2021 and Other Extensions Act
3. Executive Summary:

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

- a. The *date range* covered by this State plan or amendment.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- 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

**Response:**

- a. **July 2020 through June 2021 is the full 2020-2021 school year for Illinois, however most schools operate on an August-June or September-June schedule. We have one district with 6 July school days, however we have not yet determined if any of those children will be eligible for July P-EBT benefits.**
- b.& c. **Below find an estimate of children derived by using combining data from: number of NSLP participating schools, current school learning model, number of direct certification SNAP students, Non-Public School Free and reduced price lunch data. An attachment of the analysis spreadsheet has been included.**

	<u>Number of kids</u>	<u>Total School Year amount</u>	<u>Average Monthly Amount</u>
SNAP Kids	538,127	\$ 536,082,414.53	\$ 59,564,712.73
Non-SNAP kids	461,555	\$ 459,801,141.08	\$ 51,089,015.68
<b>total</b>	<b>999,682</b>	<b>\$ 995,883,555.61</b>	<b>\$ 110,653,728.40</b>

- d. **Illinois does anticipate submission of request for administrative funds for the current Federal Fiscal Year. At this time, the State is still in preparation of proper estimates. An**

**Amendment will be submitted to this plan to request the additional funding.**

**e. Preliminarily, Illinois is looking to distribute P-EBT benefits to children on a monthly basis based on the first letter of their last name, spread from the 11<sup>th</sup> through the 20<sup>th</sup> of the month. The final determination of the availability spread based on last name will have to be done once we get the preliminary data to know the volume within each section. Illinois will submit any update to the issuance schedule for P-EBT to FNS. There will be no difference between SNAP students and Non-SNAP students.**

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

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

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

##### A. Eligible Children

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by a application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- 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).

**Response:** [please use as much space as needed]

- The State will use a survey to schools that participate in the National School Lunch Program to determine the school level eligibility. All NSLP participating schools (as of February 2020) public and non-public schools will receive this survey. Once a school is determined eligible, we will use current school year enrollment data to ensure we are only issuing to currently enrolled students.

- Eligibility for Free/Reduced Price Meals:
  - For public schools in Illinois, we have an existing system in the Illinois State Board of Education that has an indicator of eligibility for Free or Reduced-Price meals (FRL) retained on the student record. Additionally, we know what schools have community eligibility (CEP), and therefore all students at that CEP school would meet the FRL requirement piece of eligibility. We will make the simplified assumption that if a child is marked as eligible for Free/reduced priced meals at any point in the 20-21 school year, we will consider the student as meeting the FRL requirement for the school year. As this factor can be updated at any point in time and would not have been needed prior to the implementation of P-EBT for the student to receive a free meal.
  - The eligibility for Free or Reduced Priced meals (FRL) does not consider meals provided at no cost through SFSP/SSO program. FRL is a switch within the student information system at a student level. This switch is only turned on if the student has an approved application based on income guidelines or have been determined through the direct certification process with DHS (which is also income based). Children enrolled for the current school year, may already have this switch set to FRL eligible from the prior year determination. Additionally, any new students, new applications, or corrections to this switch will be detected. For schools that have CEP eligibility, all students will be considered eligible for the program, regardless of the FRL switch, as we know that all students were eligible to receive a Free or Reduced-Priced meal based on the community eligibility and therefore meet that aspect of P-EBT eligibility.
  - For private schools in Illinois, we are building an application that the schools will use to enter the student level data for only the students that are currently enrolled within the 20-21 school year, and were eligible to receive a Free/Reduced Price Meal based on either the CEP program, or from an income based application approval. Only those children will be entered by the school.
  - SNAP vs. Non-SNAP  
Whether or not the child receives SNAP is not a direct factor here. For public school students, SNAP children would have already had their FRL indicator set through our direct certification process, but that is only one way the FRL indicator gets set. Both SNAP and Non-SNAP children will be determined as described above.
- Access to Meal:
  - All NSLP participating schools will be surveyed and an indication monthly will be certified that the school meets the P-EBT criteria. This survey will be conducted initially, and then every 2 months.
  - Once the school is deemed P-EBT eligible for the month of benefits, ISBE will collect student level data including number of eligible P-EBT days by student. This will be done via the Student Information System and for non-public schools, a separate system in our Web Based Illinois Nutrition System (WINS).
  - For public schools, Illinois will make the simplified assumption that any day that was not reported as “In-Person” attendance will be considered a day without access to an in-school meal for a qualifying school. In Illinois, a school may have a learning model of “In-Person” but still allow students the option to be fully remote. Additionally, even though their learning model is “In-Person” they may have periods of in person school closure or individual student absence due to COVID outbreaks. By definition, the school would have to have one of these conditions occur for at least 5 consecutive days for us to consider their students potentially eligible for P-EBT

benefits. Our separate survey to schools will capture the learning model and the availability of in-school provided meals to those students who are not attending in person, therefore, allowing us to reach any student that qualifies and may be in need of this benefit. It is believed that distinguishing between “unexcused” and “excused” absences would cause an unneeded hardship to both schools and students. As there is no question that either would be a day without access to an in-school provided meal. Absences can be coded as “unexcused” when there is not a known reason. Student home internet issues, a delay in turning in a parent note, or delayed phone call can result in an “unexcused” absence. While these entries could be corrected and later issued benefits, this would create additional confusion and delay of needed assistance to student families, and possibly put more pressure and work on the schools to update given information within the student information system. However, we recognize the importance of data integrity, and not to issue benefits to students that have missed due to other reasons, such as truancy. To mitigate this risk, the State will not issue to any student whose eligibility is based on all “Unexcused” absences. Instead those students will be identified and ISBE will follow up with the individual schools to verify if these are “COVID” related absences before any record is sent to IDHS. If they are not, no benefits will ever be issued. If they are “COVID” related, then a corrected record will be submitted and sent to IDHS to establish an account and create an issuance for only the eligible days.

- Private Schools- As stated above, Illinois is building an application that private schools will use to enter P-EBT eligible student level data into. One of the data required data elements for each child is “The number of school days the child did not receive a meal provided in school” for the month.
- SNAP vs. Non-SNAP—Receipt of SNAP benefits will not be a factor in the determination if the child had access to an in-school meal.
- Redetermine Eligibility and Student Status:
  - Illinois will be using actual student data rather than estimates. Therefore, we will not need to come back and reassess a student’s status.
  - Schools will be able to update data at any point in the process to make corrections. Any updates will be detected and issued any needed benefits.
  - Data will be gathered initially on all students. Schools will have access to update data daily, but regular pulls of data will occur monthly after initial set-up.
  - School survey for in school provided meals will be evaluated at a minimum every 2 months.
- Agencies and Roles
  - Illinois State Board of Education (ISBE)
    - Establish new data fields and validations for public school data to include requiring address information for all P-EBT eligible students, not just the few types of students it is needed for now. Requesting more frequent updates to the attendance data to utilize for the P-EBT process.
    - Stand up an application to collect private school data.
    - Work with schools to ensure the data is entered by the schools and is accurate and as up-to-date as possible (addresses).
    - Distribute and evaluate (electronic) school surveys to determine which NSLP participating schools meet the eligibility threshold for P-EBT, and whether or not they provide meals to students at the school for children not attending

- 100% in person.
  - Based on the information provided in the survey, and in the student data, ISBE will make an eligibility determination as to which students are eligible for P-EBT benefits.
  - Track and send any changed or updated information regarding student eligibility and data to IDHS.
  - Generate a file to be consumed by IDHS.
  - Stand-up and maintain webpage with list of participating schools that customers can view to see if their school qualifies for P-EBT
- Illinois Department of Human Services (IDHS)
  - Intake eligible student file from ISBE.
  - Perform determinations to know if the child is already known to our eligibility system, or if a new individual must be established.
  - Establish P-EBT cases and corresponding Link accounts for each individual child.
  - Perform necessary edit checks to prevent duplicate issuance, or over-issuance (i.e. validate # of eligible days does not exceed the maximum).
  - Establish Link account for each child and mail an EBT card.
  - Stand-up webpage where families can report address changes.
  - Provide customer service to P-EBT families regarding access and use of their benefits.

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- 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 the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- 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:** [please use as much space as needed]

- The State will use a survey to schools that participate in the National School Lunch Program to determine the school level eligibility. Both public and non-public schools will receive this survey. The survey will have 2 parts
  - First, will ask what learning model the school is using: In Person, Remote, or Hybrid. Schools will be able to select a learning model for each month of the school year to accommodate for known changes throughout the year.
  - Second, we will ask if children not attending all-day in person were provided in school meals. Again, this answer goes with the one above and can be different month to month. As school plans change, we recognize that so could the eligibility of their students for P-EBT if meals begin to be provided at school.
- Once a school has met this eligibility threshold, they will be considered as an "eligible school" for the remainder of the school year, and we will not look for them to meet the 5-day threshold again. We will actively conduct this survey no less than every two months, however the survey will be available for a school to submit at any time. We will have a soft



deadline for initial survey submission, to result in a timely issuance. However, we will accept late submissions and not penalize students in those late submitting schools. For integrity purposes, benefits will not be issued until all eligibility factors have been confirmed.

Additionally, even though a school has met the initial eligibility threshold, should the school update their survey for a later month to show they are back completely in person and providing meals at school to the student, the data for the students at that time would not be provided for P-EBT benefits. The survey indication will be monitored monthly, prior to the creation of the benefit file provided from ISBE data to IDHS for issuance.

- Because Illinois will be issuing based on actual attendance data, updates and additional information student data can be entered by the schools at any time, daily. As stated above, the school level survey will also be available at any time to complete. The survey also contains a question regarding availability of in school provided meals and will be required to be certified by all NSLP participating schools with any updates as needed. Schools will have the ability to indicate which month their statuses have changed.
- Schools will have the ability to update student information at any time. Any changes in student attendance will be sent to IDHS where we will compare to what was already issued (if anything) and issue any additional benefits that remain. If the correction is made that would decrease the amount of benefits a student was eligible for, the record will be written off to a report of possible overpayments for investigation.
- Simplified Assumptions:
  - 1. If an NSLP participating school is operating fully remote, then no meal is provided to students at the school.
  - 2. For public school students, where attendance record is used, any partial day calculation will be rounded up to be a whole number of eligible days (this is provided the school does not provide an in-school meal for remote/hybrid students as per the survey).
  - 3. If a child at a public NSLP participating school does not have a day of in-person school attendance, the child did not have access to an in-school provided meal for that day.
  - 4. Once a school meets the 5-day threshold for school level eligibility, it will meet for the entire school year.
  - 5. If a child's status is updated to eligible for Free or Reduced-price lunch (FRL status) at any time in the school year, that status will be made applicable to the entire school year. As most schools did not need this eligibility requirement to provide meals to students and their level of need may not be properly reflected until the P-EBT program becomes active. Additionally, the FRL status is simply a switch in the Student Information System and does not contain any application date. From the school year 2019-2020 process, Illinois recognized there were numerous children that were not correctly marked as FRL, that truly had been eligible for the benefit since the beginning of the time period. Researching these children at an individual level took a high level of manual work on behalf of DHS, ISBE, and contacting the local school district to complete the research as to when the application was initially made. For every child that was individually researched, less than 10 students were found to have a later date application. With the increased caseload of this school year issuing to all eligible children, the State anticipates that researching each child individually for when the FRL application was initially submitted would not be sustainable.

## 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 and a lunch 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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

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:** [please use as much space as needed]

Illinois will issue benefits based on the actual number of days reported by the school as without access to an in-school meal. Schools will be requested to enter attendance data each month by the 25<sup>th</sup> of the following month to allow for timely issuance. Benefit amounts will be based on the number of eligible days multiplied by the \$5.86 daily rate. For non-public schools the number of days without access to a meal will be collected. For public schools the simplified assumption will be used that if a child is not marked as "in-person" attendance for a day, it will be counted as a day without access to in school provided meal. The simplified assumption of the child not having access to an in-school provided meal when the child did not attend in person is a logical assumption that is necessary to determine their benefit amount. The attendance level data the State will be using currently differentiates between in person and not in-person attendance for the students. The assumption that a student did not receive an in school provided meal if they were not in-person attendance allows the State to use existing data and does not create a hardship for our schools to gather and enter additional elements that can be reasonably deducted. IF a student was in person but the school has indicated on the survey for that month that the school is NOT providing in school meals for students, those student in person days would be eligible for P-EBT benefits and would be provided on the data file to IDHS for P-EBT issuance. This may occur as more schools transition to in person learning for reduced hours.

## 6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to SNAP State agency (Day #5)
  - P-EBT hotline becomes active (Day #9)
  - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

**Response:** [please use as much space as needed]

**Timeline:**

**Day zero-State receives plan approval from USDA FNS.**

**Day 1- Electronic survey distributed to all NSLP schools (private and public) to indicate learner model.**

- Based on school type and answer to survey, schools are given instruction on how to properly ensure the necessary student data is entered/collected.

Day 10\*- Deadline for initial student information submission for initial round of issuance. \*this day can vary based on how quickly plan approval is received, but at a minimum, 10 days will be given. Subsequent days are all based on prior step being complete.

Day 15- Notice to all eligible children will be mailed to notify them of eligibility and to expect a P-EBT card in the mail in the upcoming weeks.

Day 15- File sent from ISBE to IDHS to establish accounts and create issuances.

Day 16-30\*\*- Processing occurs on the IDHS side to establish the accounts and create the issuance files to EBT processor for account set up and card issuance. \*\*The number of students and issuances expected in the initial file will likely require us to process the initial account establishment and issuance creation in batches. Also, we are planning to do this process over the weekend when the online eligibility system is not available to avoid any processing degradation. As discussed with the EBT processor, initial account setup transactions to EPPIC will need to be bundled in 50,000 record files to avoid EBT degradation. The State is actively working with the EBT vendor to have a schedule of file transmittal that has the least impact on day to day processing, but still meets all needs of availability. The State will make every reasonable effort to spread the initial issuances produced over a longer period of time.

For ongoing issuances, Illinois will have a deadline of the “25<sup>th</sup>” of each month for schools to submit student/attendance data to the Illinois State Board of Education (ISBE) in order for the children to receive benefits in the following month. ISBE will submit the eligible student data to IDHS by the 1<sup>st</sup> of the following month, and IDHS will process the data over the first available weekend and set issuance to come available at the end of the month.

Any changes to student data, such as additional days or newly added students, will be picked up each month in the file submitted by ISBE. The State has the ability to create multiple months of issuances, or supplements based on the data provided from ISBE. Therefore, no month will ever be “missed” by a late submittal, it will just affect the timeliness of the issuance to the household if not submitted by the deadline each month.

- We will use a unique P-EBT card design. All P-EBT children will receive the same P-EBT card, both SNAP and Non-SNAP.
- As with the Spring issuances, Illinois will utilize an indicator in the eligibility system and within the State’s EBT system to distinguish P-EBT issuances from DSNAP issuances. This indicator allows the State to pull any needed reporting data from our systems related to P-EBT. The P-EBT issuances are flagged separately from DSNAP issuances in both the IDHS EBT system and the IDHS eligibility system. The EPPIC system, while it could be derived, will not flag the P-EBT issuances separately. In the event that we have a declared disaster (DSNAP), all reporting will be done from our eligibility and/or IDHS EBT system, which is the normal procedure.
- Illinois will load P-EBT into separate accounts for P-EBT only, therefore spending priority is not applicable to this round of P-EBT. For any of the P-EBT benefits from the 19-20 school year or potential child care benefits, if those are loaded into the existing SNAP, we will use the priority of first by availability date, then issuance type with these benefits spending before a regular SNAP issuance, as our current DSNAP spending priority is programed.
- Illinois will utilize the same expungement timeframe that is used for SNAP issuances, currently 365 days of availability and 365 days of no use.

- The EBT vendor will process undeliverable Link cards in the same manner as all undeliverable Link cards. They will be processed and marked as “undeliverable” in the EBT system. Our current logic for existing cases, will detect address changes and a currently undeliverable status to generate a new card be mailed upon address update. In addition, the State has the ability to generate reports detailing any undeliverable cards to children and target these children for address remediation.
- Illinois will issue new P-EBT cards to each child with this version of P-EBT. All cards will be new as we are issuing directly to eligible children with this plan.

## 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 a actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
    - A description of P-EBT
    - Instructions for PINing a P-EBT card
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
    - Explanation of violations and penalties, such as trafficking
    - An indication that benefits are non-transferable
    - Instructions for destroying the card, if they want to decline benefits
    - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
  - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?

- Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

**Response:** [please use as much space as needed]

- **Problem Resolution:**
  - Illinois will utilize the established designated P-EBT email box, [DHS.FCS.PEBT@Illinois.gov](mailto:DHS.FCS.PEBT@Illinois.gov) for inquiries regarding P-EBT.
  - Illinois will also put a one-page P-EBT student address change form available on the IDHS website for families to easily report address changes for eligible students.
  - Illinois will either stand up a designated 800 number or add an option to the existing help desk to route customers that have questions or concerns about their P-EBT benefits. Both options are available; Illinois will stand up whichever option is quicker.
  - IDHS will create a desk aid for Hotline staff to utilize for assisting with P-EBT callers.
  - At IDHS, 28-33 staff from both regional office and central office will be reassigned to work P-EBT inquiries and corrections. Additional staff may be brought in if needed, or staff may be reassigned if not needed.
  - ISBE will have staff available to assist with inquiries from schools and families that IDHS staff are unable to resolve.
- **Service Barrier groups:**
  - The State will partner with local school districts to arrange for card delivery to homeless households. Meetings are being held at the beginning of January. The final procedure still needs approval from all parties, but preliminarily the State is suggesting providing the Schools address for homeless students in lieu of the students home address. Homeless families or students with no known address on file at the school may be directed to pick up their P-EBT Link card from the school, the school will have the family sign an attestation that the EBT card was received by them, the attestation must be held on file and available upon request, and will be turned into IDHS as the end of the processing period. Under the current school year plan, Illinois will be issuing benefits to the address on file with the school. The address for foster children is already currently collected on all public-school children. We will also partner with our sister agency to ensure foster families have the current address on file with their schools. Additionally, Illinois will be utilizing existing relationships with outreach agencies to ensure adequate assistance is available for those that are in need, as we currently service our regular population.
- **Public Information Campaign:**

Illinois will utilize the communications departments at both ISBE and IDHS to complete an information campaign regarding the program. Information will be given to the public through both written press releases and included in news announcements. Additionally, information will be posted on the external website and announced over the various social media accounts. Any communication will be sure to include only students that attend an NSLP school without access to an in-school lunch are eligible

for the program.

- **P-EBT Customer Information**

Eligible children will be identified and receive an initial eligibility notice to let them know about the program and that a card is coming. The information notice will contain all of the dot points listed above. All SNAP and non-SNAP children will receive this notice with the detailed information.

Additionally, with the P-EBT card, there will be a buckslip and Link brochure. The Link brochure, hotline, and website in Illinois is available in 6 languages, English, Urdu, Arabic, Polish, Mandarin, and Spanish. Notices produced from our eligibility system are only available in English and Spanish. Illinois does have a translator service that is used for any telephone calls where translation is needed.



## 8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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

**Response:** [please use as much space as needed]

9. **Illinois will have the ability to track any detected over issuance of P-EBT data. This data will be available in report form for analysis to determine if a claim will be pursued. At this time, Illinois is looking at a \$500 threshold for pursuing a P-EBT claim against a household. Should a claim be established, repayment of the claim will not occur by recoupment of regular SNAP benefits, but rather through the other avenues of benefit repayment collection.**

## 10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

## 11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30, 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778

should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

**12. Release of Information**

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

**13. Civil Rights Statement**

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

**14. Administration of State P-EBT Plan**

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

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

*Leslie K. Cully*

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Signature

Print Name and Title

Leslie K. Cully, Illinois SNAP Director

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Signature

Print Name and Title

**Date of Request:** January 11, 2021