

**State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022**

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, 2021-2022
Document ID:	
Z-RIN:	
Date of Issuance:	August 26, 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 children in schools or child care during school year (SY) 2021-2022. (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:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

1. State Illinois:
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
 - 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. 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:

- a. August 2021 through June 2022 will be considered the full 2021-2022 school year for Illinois.

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 2021 through June 2022, for example).

b. & c. Below find an estimate of children derived from the most current available attendance data submitted by public schools, based on submitted plan eligible P-EBT school days.

Total Estimated School children served by P-EBT: 1,233,730

Total Estimated amount of P-EBT to school children: \$ 102,524,663.02

d. School P-EBT is anticipated to be issued in October 2022 based on actual attendance data from schools. Depending on availability of information, issuance may occur in November 2022.

4. P-EBT for School Children (see Q&As #6-24)

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 2021-2022, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, **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 determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals²? 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.

² 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.

- 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.
- 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).
- 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.

Response: [please use as much space as needed]

- For the 21-22 School year, Illinois proposes to utilize monthly attendance data to determine P-EBT eligibility for each student. Therefore, only enrolled children will be issued benefits. The State system stores a Free/Reduced Price lunch indicator for students. Additionally, the State can identify CEP schools to recognize all the students enrolled are eligible. To determine eligible days and calculate the issuance amount, Illinois proposes using the following:

Public schools:

- Automated P-EBT Issuances: FRL eligible Students or all enrolled students in a CEP approved participating NSLP schools who have:
 - 5 or more attendance days in a month coded as E-Learning, Remote Learning, or Excused; we will determine all days in these 3 statuses are P-EBT eligible days and create an automatic issuance in the amount for the total number of days in these 3 statuses multiplied by the daily amount.
 - Less than 5 attendance days in a month coded as E-Learning, Remote Learning, or Excused; we will determine that only Remote Learning attendance days can be assumed P-EBT eligible, an automatic issuance will be created for only the number of Remote learning days multiplied by the daily amount
- Non-Automated P-EBT Issuances: FRL eligible Students at participating NSLP schools who did not receive an Automated Issuance will have the ability to make a request to IDHS through the web or by hotline to attest that any additional excused absences or E-Learning attendance days were “COVID Related”. IDHS will use the attendance data received by ISBE to verify any customer attestation that the child was without access to an in- school meal.

Non-Public schools:

- These schools do not use the same attendance codes as our public schools. These Non-Public schools will be given instruction to report the number of P-EBT eligible days for each calendar month for any child that meets the eligibility criteria.
 - The definition of an eligible day will be: Any day a child missed access to an in-school provided lunch due to COVID related reasons.
 - We will automatically issue a benefit for the number of days the school provided.

- Simplified Assumptions:
 - Illinois does not collect COVID specific data related to attendance. Due to this, Illinois would like to make the reasonable assumption that Remote attendance days in the 21/22 calendar are “COVID related” for the purpose of P-EBT eligibility. Prior to the pandemic, only a small number of school districts were allowed to utilize e-learning or remote learning in very specific situations. Additionally, the definition of Remote Learning attendance days in the ISBE Student Attendance Requirements demonstrates the expectation that the majority of these days are Pandemic related. Definitions are provided below, and also available on the ISBE website:
 - **Remote Learning:** *If the Governor has declared a disaster due to a public health emergency pursuant to Section 7 of the Illinois Emergency Management Agency Act, the State Superintendent of Education may declare a requirement to use remote learning days or blended remote learning days for a school district, multiple school districts, a region, or the entire State. During remote learning days, schools shall conduct instruction remotely. A district may meet the requirement of a remote learning day in a number of ways, provided 5 hours of instruction and school work are provided. Further, ISBE strongly recommends that 2.5 hours of the 5 hours be synchronous instruction. See 105 ILCS 5/10-30.*
 - **E-Learning:** *Pursuant to state law, a school district may adopt an E-learning program. In order to adopt an E-learning program, a district must draft and adopt an E-Learning program within the specifications of Section 10-20.56 of the School Code. Additionally, the E-Learning plan must be verified by the applicable regional office of education or intermediate service center. As originally composed, the E-Learning law allowed districts to use an E-Learning day in lieu of an emergency day—and the number of E-learning days used cannot exceed the number of proposed emergency days on a district’s school calendar. However, amendatory language due to the pandemic allows a district with an E-Learning plan to use E-Learning days as its form of remote instruction if operating schools remotely. In such cases, there is not a limit to the number of E-Learning Days that may be used, provided they are being used due to the public health emergency.*
 - E-learning and Remote learning days are only considered eligible for NSLP eligible schools that do provide in-person learning for some/all students during the school year.
 - In Illinois, at the State level, we only receive monthly total attendance data. Illinois is unable to confirm consecutive excused absence, e-learning, or remote attendance days. Therefore, Illinois would make the reasonable assumption that 5 or more attendance days in these codes for a given month will meet the eligibility criteria of 5 or more consecutive days based on the best information available.
 - In Illinois, at the State level, we only receive monthly total attendance data. When ISBE will pass the total number of excused absences, Remote Learning,

and E-learning days to IDHS for each student, we will send whole number amounts, rounding any partial day to the next whole number for each month.

- Verbal attestation via telephone and submissions online of webforms from families of COVID related absence will be acceptable form of attestation for those days that require specific attestation.

- Agencies and Roles

- Illinois State Board of Education (ISBE)

- Develop method to collect Private School data.
 - Based on the information provided in the plan, and in the Student Data, ISBE will identify children who meet the FRL criteria for PEBT along with the number of Remote learning, E-Learning, and Excused Absence days each child has for each month of the 21/22 school year.
 - Collect and send student eligibility data to IDHS that specifies how many days each student had in attendance in the three attendance types.
 - Generate a File to be consumed by IDHS.
 - Provide the maximum number of school days per month in the 21/22 school year.
 - Provide IDHS with the most current RCDTS list with corresponding school information.
 - 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.
 - Build a process that will intake the multiple attendance days for all students that will determine if a child has a total of 5 or more days in one of the 3 attendance statuses for any month in the school year.
 - If the child does have 5 or more days in a month, IDHS will create an issuance for the daily amount multiplied by every day reported in all 3 attendance statuses for the given Benefit Month.
 - If the child does not have at least 5 days in a month, IDHS will create an issuance for any Remote days in that month multiplied by the daily rate. *IDHS will not systematically issue any Excused Absence or E-Learning attendance days in a month if there is not a total of 5 or more days in that month in the 3 statuses.
 - IDHS will also stand up an additional process that will store and display to workers what days were reported to IDHS from ISBE. In the event that P-EBT was not systematically issued, workers will be able to create a request to process additional days once attestation is received by the customer. Edits will be in place to prevent a worker from creating an issuance that would result in the child receiving benefits for more days than the total number of days reported by ISBE for the given month. There will be a method for a worker with appropriate access to create an issuance for additional days in the event the school verifies that the attendance reported to ISBE was incorrect, and there are additional days in an eligible status.
 - Provide a web form for families to attest that additional attendance days were “COVID related”.

- IDHS will review customer attestations from both the web and hotline and take appropriate action to issue or deny.
- 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. Or recognize existing P-EBT Case and add the additional benefit.
- 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 new 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.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response: [please use as much space as needed]

- Once the data is received by ISBE, IDHS will confirm that there is at least one school in each county that has at least one student that has 5 or more days in one month in the three attendance statuses. This will confirm that the schools in each county have met the 5 or more days with reduced attendance.
- IDHS will use the same attendance data described above to determine there is at least one student in each school meeting the condition. We anticipate having one data pull from ISBE for the 21/22 school year.

Simplified assumptions

- Any school that operates under a fully virtual model for the school year (i.e. a virtual academy) is not eligible to participate in NSLP and therefore their students will not be eligible for P-EBT benefits.
- E-learning and Remote learning days are only considered eligible for NSLP eligible schools that do provide in-person learning for some/all students during the school year.
- In Illinois, at the State level, we only receive monthly total attendance data. Therefore, Illinois would make the reasonable assumption that 5 or more attendance days in these codes for a given month will meet the eligibility criteria of 5 or more consecutive days based on the best information available.

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 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

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-2021-07-16/pdf/2021-15107.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 actual days missed multiplied by the daily rate of \$7.10.
- Eligibility
 - Any child that met the criteria for 5 or more days in a month will systematically be issued the P-EBT benefit for that month for all days in one of the 3 statuses.
 - Any month where a child had less than 5 days,
 - Remote status - Benefits will be systematically issued.
 - Excused Absence status- The family will have to submit a form attesting that the excused absence was COVID related and IDHS will use this information to validate any attestation received by a family with the attendance information provided by ISBE.
 - Benefits will only be issued up to the number of days the School information file shows the child was in one of the 3 statuses, without proper access authority and confirmation from the school

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 2020-2021, 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 2020-2021. 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 2020-2021, 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:

- If FNS approval is received, tentative schedule is to receive ISBE attendance and student data in the month of September 2022. School P-EBT issuance is expected to occur in October 2022 or November 2022 dependent upon system readiness and data availability.
- Issuance will be created in the same month, since P-EBT amount is expected to be lower, but availability will be spread as it was last year:

Availability Date	First Letter of Last Name
11	A
12	B
13	C
14	D, E, F
15	G
16	H, I
17	J, K, L
18	M
19	N, O, P
20	Q, R

21	S, T
22	U, V, W, X, Y, Z

- 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.
- We will utilize the same P-EBT accounts as the prior year.
- With the 21/22 school year issuances, Illinois has created a new benefit type of “P-EBT” in the eligibility system (IES), the State’s EBT system, and the Vendor EBT system to distinguish P-EBT issuances from SNAP and DSNAP issuances. This new benefit type allows the State to modify existing SNAP reports to pull any needed reporting data from our systems related to P-EBT. Additionally, once the new benefit type is established, we will be updating the previous P-EBT issuances to also reflect the new P-EBT benefit type.
- Illinois will load School P-EBT into separate accounts for P-EBT only, therefore spending priority is not applicable to this round of P-EBT.
- Illinois will utilize the same expungement timeframe that is used for SNAP issuances, which will transition to 274 days of availability and 274 days of no use, implemented by October 1st, 2022.
- 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 use existing logic to determine if a new P-EBT cards to each child will need to be sent with this round of P-EBT, as these are existing accounts. All Card will be issuing directly to eligible children with this plan.
 - One month after the initial issuance has occurred, IDHS will analyze any account that did not receive a new P-EBT card for usage. If no usage has occurred, the state will systematically generate a new card to the household. Using this method allows for any family that did hold on to their existing card to not have any delay in access to benefits but also ensures anyone that misplaced their card and is unaware new benefits are available the timely notification of new benefits.

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 from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children 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: [please use as much space as needed]

- Problem Resolution:
 - Illinois will utilize the established designated P-EBT email box, 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 DHS Website for families to easily report address changes for eligible students.
 - IDHS will put a one-page P-EBT COVID attestation form available on the DHS Website for families to easily attest to COVID related excused absences. This form will not be available until the initial systematic issuance has occurred.
 - Illinois will continue to use the designated 800 number to assist customers that have questions or concerns about their P-EBT benefits. Families can also use the hotline to provide verbal attestation of COVID related excused absences once the initial issuance has occurred.
 - IDHS will create a Desk Aid for Hotline staff to utilize for assisting with P-EBT callers.
 - At IDHS, staff from both Regional office and central office will be reassigned to work P-EBT inquires, attestations, and corrections. Additional staff may be brought in if needed, or staff may be reassigned if not needed.
 - ISBE will direct callers to IDHS for assistance.
- Service Barrier groups:
 - The State will partner with local school districts to arrange for card delivery to homeless households. IDHS will work with school districts and families to determine if the Schools address or the local DHS address should be used 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 or the local DHS office, 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 or a more recent address that the customer has provided. 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 an issuance 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. 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. In an effort to mitigate the confusion and hardship placed on families to remember specific attendance details from the previous year and to understand if their school utilized Remote versus E-Learning Attendance codes; the State will produce a letter to each eligible student detailing the number of eligible attendance days that were issued, in addition the number of possible excused absence and E-Learning days that were not issued. The letter will include a statement that days are only eligible if the missed attendance was COVID related. It will provide the phone number and website for the family to use in order to attest to any applicable absences as COVID related.

8. Over-issuance of P-EBT benefits

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

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

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

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

Response: [please use as much space as needed]

- Illinois has been diligent to mitigate the risk of Over Issuance of School P-EBT benefits.
 - Extensive testing of the calculations and logic used to produce the issuances is performed and reviewed before being executed in production.
 - As with previous years' processes, P-EBT benefit data is stored in a table designated for P-EBT by child (individual ID) by benefit month and amount.
 - A "sanity" check edit is used at the end of the issuance creation process to ensure that no other issuance (during a previous process or with current process) has been created for the specific child for the specific benefit month. This will prevent duplicate issuance of P-EBT for the same child.

Illinois feels that overpayment establishment for P-EBT would create an undo hardship on Illinoisians during a public health emergency. Any over issuance would be a result of Agency error rather than the customer. This accompanied with the complication of understanding if one has even received an over issuance leads Illinois to not pursue any over issuance of P-EBT benefits for this school year.

Accuracy and maintaining Program Integrity is a top priority of the Illinois P-EBT team, and will remain a priority even if overpayments are not pursued against the customer.

Any discovery of over-issuance of School P-EBT benefits will be reported to USDA, FNS upon request.

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.

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, 2021 through September 30 2022. 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 ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing 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:

Leslie Cully

Signature
Leslie K. Cully, Illinois SNAP Director

Signature
Print Name and Title

Date of Request July 28, 2022