

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

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, 2022-2023
Document ID:	
Z-RIN:	
Date of Issuance:	September 8, 2022
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) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

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

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

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

Response:

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

- a. Date Range
 - School: August 2022- June 2023
 - Child Care: August 2022 – May 2023
- b. Amount
 - School: \$118,119,963.87 *a better estimate may be available once school year 21/22 is issued.
 - Child Care: \$ 80,977,655.90
- c. Number
 - School: 1,233,730
 - Child Care: 325,218
- d. Schedule
 - School: July 2023 (systematic); July through 9/30/2023 for additional attestation.
 - Child Care: June 2023 (fall semester); July 2023 (Spring Semester)

*Make up run completed in August or September for late approval or updated children.

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

A. Eligible Children

Standard for P-EBT Eligibility

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

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined “other source categorically eligible” for SY 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. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25).

Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

- How will the state determine and/or confirm each child's eligibility for free or reduced-price meals?² Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child's lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state's schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child's in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the process that the state will use to identify individual students' COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g., which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the state will take to address program integrity when using the proposed simplifying assumptions. *(Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)*

Response: [please use as much space as needed]

For the 22-23 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: For the benefit months of August 2022 through April 2023, 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.
 - For the benefit months of August 2022 through April 2023, 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

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.

- Non-Automated P-EBT Issuances: FRL eligible Students at participating NSLP schools who did not receive an Automated Issuance for qualifying attendance days through May 2023 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.
 - Maximum number of qualifying days for the month of May 2023 will be 9 days. When accepting attestation, the State will specify to the family that only days through May 11th are potentially eligible for P-EBT. And that only missed access to a school lunch that occurred through May 11th should be attested to being COVID related. Customer attestation will be accepted as verification that the missed attendance was on or prior to May 11th, 2023, since ISBE only collects monthly level attendance data.
 - Illinois has built a module within the eligibility system that will intake attendance data from ISBE, of eligible students at NSLP public schools that have attendance days in at least one of the eligible attendance types. This module will identify any systematic issuances that can be made and will display any reported attendance that could not be automatically issued. This reported attendance section is where workers will be able to authorize additional benefits that families attest are COVID related. Edits within this module will prevent caseworkers from authorizing benefits for more days than what was reported by the school. Additionally, Illinois will document who and how attestation was given to the State.

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, only through May 11th, 2023 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.

Fully Virtual & Home Schooled Children:

- IDHS will have an application available online for fully virtual and homeschooled children that were enrolled in an NSLP participating school in January 2020 or later and then moved to home schooling due to COVID related reasons to apply for P-EBT benefits. The application will only be available until July 15, 2023 to allow for processing.
- The application will explain this is an application for P-EBT benefits and requirements for P-EBT eligibility, and then contain generally the same layout as the Free & Reduced Lunch application. Additionally, the application will capture the School and District the child attended prior to becoming homeschooled and an attestation that the reason for homeschooling is due to a COVID related reason.
- To verify income eligibility:
 - IDHS will first check the school listed on the application as the “currently assigned public school” for CEP eligibility. If the school is eligible for CEP, then the child will be deemed as meeting the financial requirement. If no, then the worker will move to the next step.
 - Next IDHS will verify if the child qualifies for direct certification by receiving SNAP, Cash, or Medicaid benefits. No further verification will be needed for income if the child qualifies for direct certification.
 - If the child does not qualify for direct certification, then income verification will be required for all remaining applications. Acceptable verifications will be the same as for SNAP. Verification can be submitted via email @ DHS.FCS.PEBT@Illinois.gov; via fax

@ 217-524-0474, via mail at PO Box 19401 Springfield, IL 62791, or in person at the FCRCs. Once verification is received, an income test will be completed.

- To verify prior enrollment in an eligible school, IDHS will send the child information to ISBE contacts to verify the last school enrollment and that schools NSLP status.
 - If a child only reached school age during the pandemic, then IDHS will have to verify identity rather than prior school enrollment. IDHS will do this through the same process that is used to establish and verify SNAP identity.
- Benefit calculation will be based on the standard estimate of 18 days per month (180 school days divided by 10 months) for the benefit months of August 2022 through April 2023. The benefit month of May 2023 will only be 9 days, as the PHE will end May 11th, 2023.
- Since applications will be collected and verified after the end of the school year, continued verification of status will not be needed.

- 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 22/23 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.*
 - The current Student information System in Illinois does not have COVID specific coding. Additionally, making changes to this system takes years to implement and would not be feasible to be in place in time to use for the current school year. Due to this, Illinois would like to use the reasonable assumption of using the here-in described attendance codes for the purpose of P-EBT eligibility.
 - 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 in NSLP schools, 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 22/23 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 22/23 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 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]

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 main data pull from ISBE for the 22/23 school year.

In the event that a school does not have a child meeting the condition above, the State will further analyze these schools' attendance data to see if any student has 5 or more days in the three attendance statuses in 2 consecutive months. Since Illinois only receives monthly data, this would be the only way to catch consecutive reduced attendance that would span across 2 months that do not total over 5 days in either calendar month.

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 unless these children were previously enrolled in an eligible school January 2020 or after and moved to virtual learning due to COVID related reasons. The child/family must submit an application for PEET to be considered for eligibility.

- 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.
 - Illinois feels the administrative burden to do a one-time data collection regarding school eligibility of over 1000 individual schools before the end of the school year would be too great on our schools and central board of education. In addition, due to the current issuance of prior year benefits, the State feels the attempted collection would prove to be only confusing for schools and not prove to be a cost benefit over using attendance data to complete analysis.

5. P-EBT for Children in Child Care (see Q&As #26-33)

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and

- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44³. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children's eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- How will the state determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #30)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine those children's eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?

³ The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

- Describe the process that the state will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

Response: [please use as much space as needed]

***Draft plan language for states that elect to use the CACFP data method.
Please replace the red text below with language specific to your state plan.***

Responsible state agencies

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- ***Illinois Department of Human Services are responsible for the development and administration of Child Care P-EBT for the 22/23 School Year.***
- ***Illinois State Board of Education will provide CACFP data to IDHS when needed.***

Identifying SNAP Enrolled Children

- ***Illinois*** will identify non-school children who began school year 2022-2023 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that non-school children who began receiving benefits as a 5-year-old earlier in school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- ***Illinois*** understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- ***Illinois*** will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits. ***Illinois will ensure that children attending pre-K programs at schools during the school year and receive School P-EBT benefits will not also receive school year child care P-EBT benefits***

- Illinois will identify children younger than 6 years who apply for SNAP between May 1 and May 11, and are found eligible for SNAP. These children will receive the pro-rated May benefit.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, *Illinois* will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches.
- *Illinois* will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

Setting Benefit Levels Using the CACFP Data Method

- *Illinois* will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using **the following three factors**:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. Based on *Illinois'* anticipated distribution of fall semester P-EBT child care benefits in *June 2023*, the state will use fall 2022 CACFP claims data for the months of *August 2022* through *December 2022*.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[180] \div [10 \text{ months}] = [18]$ days per month. *[If applicable: This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.]*
3. The school year 2022-2023 P-EBT benefit per day of \$8.18

Table 1: Reduction in CACFP lunch claims – fall semester
[States with school years that begin in September will delete the August row.]

Fall Semester				
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:
August 2019	2075381	August 2022	1773333	To be applied to daily

September 2019	1775736	September 2022	1519045	rate and number of school instructional days per month.
October 2019	2109904	October 2022	1532703	
November 2019	1736972	November 2022	1493954	
December 2019	1680368	December 2022	1386074	
Total (not inc Dec)	9378361	Total	7705109	-17.8%

Note:

CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Before calculating its monthly fall P-EBT benefit, *Illinois* commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the fall semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Spring semester benefit:

1. The spring semester benefit will be calculated as above but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of spring semester P-EBT child care benefits in *July 2023*, the state will use spring 2023 CACFP claims data for the months of *January 2023* through *March 2023*.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[180] \div [10 \text{ months}] = [18]$ days per month. *[If applicable:* This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.]
3. The school year 2022-2023 P-EBT benefit per day of \$8.18

Table 2: Reduction in CACFP lunch claims – spring semester

[States with school years that end in May will delete the June row.]

Spring Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester: To be applied to daily rate and number of school instructional days per month.
January 2020		January 2023		
February 2020		February 2023		
March 2019		March 2023		
April 2019		April 2023		
May 2019		May 2023		

June 2019		June 2023		
Total	TBD	Total	TBD	TBD%

Note:

CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Before calculating its monthly spring P-EBT benefit, **Illinois** commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months. **May Benefits will be prorated to ½ the calculated Spring amount.**

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

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

Notes:

1. Lunch rates include the 8 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

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

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the state propose? Why must the state make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

Average monthly P-EBT child care benefits, fall and spring semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Daily Benefit Amount	Average Monthly Benefit
Fall Semester	17.8%	18	\$8.18	\$26.21
Spring Semester	TBD%	18	\$8.18	TBD
May 2023	TBD%	9	\$8.18	TBD

Notes:

- 1. Percent Change in CACFP Lunch Claims:** These are the figures in the lower right-hand corners of Tables 1 and 2.
- 2. Average Number of Virtual Days per Month:** This is the number of school instructional days in the state’s school year divided by the number of benefit months in the state's P-EBT plan. Typically, this is 180 instructional days ÷ 10 benefit months (September through June or August through May).
- 3. Average Monthly Benefit:** This is the outcome of multiplying the figures in the three preceding columns.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 with estimated dates for major milestones in your plan.

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

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states’ ability to report and USDA to maintain accountability for P-EBT.

- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.
- How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Child Care:

- Dependent upon the timing of plan approval (for fall 2022 benefits), timely access to Spring CACFP data (Spring 2023 benefits), and other system availability factors (both semesters), the following is the tentative Schedule of Child-care P-EBT issuance:
 - Fall 2022 issuances: **June** 11th-21th, 2023
 - Spring 2023 issuances: **July** 11th-21th, 2023
 - Clean up issuances (late approvals, etc.): **September** 11th-21st
 - Benefit availability dates will be spread based upon the regular SNAP availability date.

Regular Availability Date	CC P-EBT availability date
1st	11th
2nd	12th
3rd	13th
4th	14th
5th	15th
6th	16th
7th	17th
8th	18th
9th	19th
10th	20th
13th, 17th, 20th	21st

- Child-care P-EBT issuances will be issued to the existing SNAP EBT account (as with prior year benefits)
- Child Care P-EBT issuances will be coded as P-EBT SNAP issuances and distinguished from regular SNAP issuances in both the eligibility and EBT system.
- P-EBT drawdown is prioritized over SNAP drawdown.
- P-EBT will follow the same expungement timeline. Since Illinois will move to 274 days for regular SNAP, so will P-EBT.
- Returned cards and/or New PEBT cards questions are not applicable to Child-Care P-EBT.

School P-EBT

Timeline:

- If FNS approval is received, tentative schedule is to receive ISBE attendance and student data in the month of June 2023. School P-EBT issuance is expected to occur in July 2023. A 2nd ‘clean-up’ file of any newly approved or missed children will be ran in September 2023. Attestation of additional COVID related absences will be taken through August 31, 2023.
- The Systematic Issuance will be created and available in July 2023, 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

- Illinois will use a Unique P-EBT card design. All P-EBT children will receive the same P-EBT card, both SNAP and Non-SNAP.
- Illinois will utilize the same P-EBT accounts as the prior year benefits. Most students will not need a new card as the 21/22 school year will have been recently issued.
- As with prior issuances, Illinois will utilize an unique issuance type in the eligibility system and within the State’s EBT system to distinguish P-EBT issuances from DSNAP and regular SNAP issuances. This issuance type allows the State to pull any needed reporting data from our systems related to P-EBT. The PEBT issuances are flagged separately from DSNAP issuances in both the DHS EBT system and the DHS eligibility system.
- P-EBT is prioritized to drawdown prior to regular SNAP.
- 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.
- 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.
- 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.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages states to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages states to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

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

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

- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [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.
 - Illinois will continue to use a designated 800 number to assist customers that have questions or concerns about their P-EBT benefits.
 - 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 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 or from IDHS staff that IDHS staff are unable to resolve on their own investigation.
- Service Barrier groups:
 - The State will still have all the same methods established in prior school years available to serve these groups. The most effective method for getting cards to families with barriers has proven to be to direct families into our FCRCs where they are issued a Link card. These families would receive a card that looks like a “regular” SNAP Link card but will function the same as the white cards and connect to their P-EBT account. Under the current school year plan, Illinois will be issuing benefits to the address on file with the school or updated address from the customer on the existing account. 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 eligible students that attend an NSLP school without access to an in-school lunch are eligible for the program.

- IDHS will reach out to the homeschooling associations in Illinois to work with them to get the message out to eligible families. By working with the associations, we are hopeful that there will be successful communication that P-EBT benefits are only available to a **narrow subset** of children who enrolled in a fully virtual institution or began homeschooling since the January 27, 2020 start of the pandemic due to concerns about COVID.

- **P-EBT customer information**

The P-EBT card comes on a tri-fold paper that contains all the important P-EBT program information.

The Illinois P-EBT webpage at www.dhs.illinois.gov/pebt will continue to be utilized.

Information regarding Summer P-EBT and an FAQ will be posted, as with prior years.

The IDHS website utilized Google Translate technology and is available in the many languages provided through Google Translate.

The Link Brochure, Hotline, and EBT 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.

9. Over-issuance of P-EBT benefits

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

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

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the state's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a state's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. states that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances

under which the state may attempt to recover benefits or reduce a future issuance. Under no circumstances may the state reduce a SNAP benefit to settle a P-EBT claim.

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

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

Response: [please use as much space as needed]

- Illinois has been diligent to mitigate the risk of Over Issuance of School P-EBT benefits. Mitigation actions include but are not limited to:
 - 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 undue 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 no 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.

Illinois commits to providing the nature of the error that gave rise to the over-issuance, the number of children affected, the aggregate amount of the over-issuance. Additionally, Illinois will provide a thorough description of the corrective action implemented to prevent reoccurrence of the P-EBT over-issuance via the spreadsheet that USDA provided to states to capture this information.

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, 2022 through September 30 2023. As the authorized grantee, the SNAP state agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP state agency, the SNAP state agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP state agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

As noted in Item 9 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

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 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.

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 Cully

Signature

Print Name and Title

Leslie K. Cully, Illinois SNAP Director

Signature

Print Name and Title

Date of Request: 06/12/2023