



Food and Nutrition
Service

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February 21, 2023

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Indiana's State Plan for Children in Schools
and Child Care, School Year 2022-2023

TO: Vista Fletcher
Regional Administrator
Midwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Indiana's enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Indiana Family and Social Services Administration, Division of Family Resources and the Indiana Department of Education will issue P-EBT benefits through the state's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The state's plan covers the months of August 2022 through May 11, 2023.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The state will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service through their schools or child care facilities.

Children in Schools

The state and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2021-2022 graduates and other non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes. The state will also provide a path for households with eligible homeschooled children and children in fully virtual schools to receive benefits; these children may be eligible if they began homeschooling or enrolled in fully virtual school due to concerns about the COVID health emergency.

In addition, Indiana has or will:

(for children currently enrolled in NSLP-participating schools)

- transitioned to a new Department of Education (DOE) attendance system for public and private schools that requires use of specific attendance codes for COVID-related absences and school-approved COVID-related virtual learning days,
- instruct NSLP-participating schools and districts to provide each student's P-EBT eligible days to the state's DOE database; the DOE database is continuously available to school staff for updating of student information:
 - schools will not report any COVID-related absences or virtual learning days after May 11, 2023
 - the state's data warehouse staff will follow up with DOE on any questions or concerns about the DOE data,
 - the state's EBT vendor receives student benefit information from the data warehouse and will load benefits into EBT accounts,
- tentatively issue benefits for the first semester of the school year by late April 2023,
- tentatively issue benefits for the second semester of the school year by late May 2023.

(for eligible children attending non-NSLP virtual schools and eligible homeschooled children)

- conduct a public information campaign to encourage households of potentially eligible children to apply for benefits:
 - the state's public information campaign will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children enrolled in homeschool or virtual school from the start of the public health emergency and the date of the plan approval by USDA,
- create a P-EBT application portal that will be available from mid-March through May 15, 2023 to collect the information necessary to confirm children's eligibility for P-EBT benefits:
 - applicants will provide basic contact and demographic information for parents/guardians and the child,
 - applicants will indicate whether their children are homeschooled or enrolled in a virtual school,
 - applicants will select the reason their children attend a non-NSLP virtual school or are homeschooled; only applicants that select COVID concerns as the reason will be potentially eligible for P-EBT,
 - children currently enrolled in virtual school will provide the name of the school; if the applicant claims current enrollment in one of the state's accredited virtual schools, the state will match the child's name

- against DOE's database of enrolled students; children not confirmed as currently enrolled in the named virtual school will not receive benefits,
- applicants will provide the names of their children's previous NSLP-participating schools or indicate they have never been in an NSLP school, if in kindergarten through second grade:
 - for non-K-2 children previously enrolled in an NSLP-participating school the state will match the children's names to the DOE school reporting system for confirmation of their previous enrollment at some point on or after the start of the pandemic; if not confirmed, the children will not receive benefits,
 - children who unenroll from an in-person school to begin homeschooling or to enroll in a fully virtual school after the date of approval of the state's P-EBT plan will be denied benefits,
 - for K-2 children and other students who entered Indiana schools since the start of the pandemic, and have always been homeschooled or always attended a fully virtual school, applicants will upload documentation (such as a birth certificate) through the portal:
 - state officials will review these applications on a case by case basis; if necessary, the state may also use its integrated eligibility system to confirm children's identity through enrollment in other state public assistance programs,
 - the state will collect information (such as but not limited to SNAP case number) to determine categorical eligibility for free meals; the state will also determine whether the child's local public school participates in CEP,
 - for children who are not categorically eligible for free meals or whose local public school does not participate in CEP, the state will confirm income eligibility through the P-EBT portal's free and reduced price meal application:
 - children determined income eligible for free or reduced price meals will be assumed income eligible back to the start of the school year if they submit their P-EBT applications in the first month of the application portal's availability; other households will be assumed income eligible from the date of their P-EBT application,
 - the state will use the income documentation provided by applicants to verify eligibility as follows:
 - the state will confirm that the documentation matches the income entered on the application for the first 100 applications received,

- if the error rate on the first 100 applications is at or above 5 percent, the state will continue to verify all applications,
- if the error rate is below 5 percent, the state will verify 10 percent of remaining applications; if at any time, the error rate rises above 5 percent, Indiana will resume verifying the documentation for all applicants,
 - the state will provide USDA the opportunity to review the application prior to implementation,
- issue benefits to homeschooled and virtual school students for up to 171 instructional days given the anticipated end of the public health emergency on May 11, 2023:
 - the state will issue benefits on a monthly basis, as applications are approved, if volumes are low,
 - the state tentatively plans to issue all benefits to these students no later than the end of June 2023.

Children in Child Care

At a minimum, the state will identify all children under age 6 who are enrolled in SNAP in the benefit month. The state will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the state will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Indiana has or will:

- identify SNAP-enrolled children under age 6,
- determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2022-2023 to the same months prior to the pandemic,
- issue an average monthly benefit to all eligible children statewide for the months Indiana experienced a reduction in child care access:
 - use the reduction in claims for August through November 2022 compared to August through November 2019 to calculate and issue benefits for August through December 2022,
 - use the reduction in claims for January and February 2023 compared to January and February 2020 to calculate and issue benefits for January through May 2023,
 - for all benefit months except May 2023, multiply the reduction in claims by the average monthly number of instructional days for school children in the same months (180 days over 10 benefit months for an average of 18 days per month), and by \$8.18, to determine the average monthly benefit,
 - for the month of May, set the benefit to half of the monthly spring semester benefit to account for the anticipated May 11 end of the public health emergency,

- provide USDA with the state’s tentative average fall and spring semester benefits for confirmation prior to issuing benefits,
- confirm that lunch claims, for the most current months where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months,
- tentatively issue benefits for August through December 2022 in April,
- tentatively issue benefits for January through May in May:
 - the state will schedule a clean up issuance after May, if necessary, for children in households who are determined SNAP eligible on applications submitted through May 11 but not approved in time for the May issuance.

Finally, the state will identify risks for improper payments and ensure a high level of integrity.

Estimated Caseload and Value of P-EBT Benefits

The state will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the state’s plan.

- Indiana estimates that it will issue \$15.8 million to approximately 90,000 school children for school closures and reductions in attendance and hours extending from August 2022 through May 11, 2023.
- Indiana estimates that it will issue \$27.5 million to approximately 96,000 SNAP-enrolled children in child care August 2022 through May 11, 2023.

Release of Information

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Indiana. Section 1101(e) of the Act states, “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.”

Plan Timetable and Revisions

Indiana will distribute benefits to households consistent with the timeframes identified in the state plan. Should the state encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the state must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the state to identify reasonable solutions and review revised plans for approval or further revision.

Civil Rights

Indiana 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.

Administrative Funds

The Indiana Family and Social Services Administration, Division of Family Resources will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the state's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the state's operational plan evolves.

Reporting

The Indiana Family and Social Services Administration, Division of Family Resources will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS values Indiana's partnership in the administration of Pandemic EBT. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long
Administrator