

**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: INDIANA

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– SY 2022-2023 (August 2022-May 11, 2023)
 - for children in child care– SY 2022-2023 (August 2022-May 11, 2023)
Note: May 11, 2023 is the date the Federal PHE is being lifted. Thus, May benefits would not exceed 9 days.
For school year, total benefit would not exceed 171 days
- 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– we do not differentiate the school children in SNAP and non-SNAP – total estimated school children for the first semester is 40,000 unique students and total approximate days virtual or absent due to COVID is approximately 115,000. $115,000 \times \$8.18 = \$940,700$. Homeschool/virtual at 10,000 estimated participants for 1st semester x 90 days = \$7,362,000. Eligibility for P-EBT benefits will end as of May 11th since that is the last day of the federal PHE. There are systems in place both for DOE and our data warehouse to make the necessary adjustments to ensure that benefit eligibility ends on this date.
 - Estimated amount issued to non-school children in child care – $96,000 \times \$30.20 \text{ per month} \times 5 \text{ months} = \$14,496,000$. For 2nd semester, the estimate would be for 4 months and then 9 days in May 2023. $96,000 \times \$30.20 \times 4 \text{ months} = \$11,596,800 + \$1,449,600 (9 \text{ days} \times \$8.18 \times 20.51\% \times 96,000) = \$13,046,400$.
 - Estimated number of non-school children in child care - 96,000 for 1st semester. 2nd semester estimate would be 96,000 in child care.
- c. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households– estimated issuance for first semester is targeted to occur by the end of April 2023

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).

- School children in non-SNAP households – same as above
 - Children in child care – estimated issuance for SY is targeted to occur by the end of May 2023. However, for those children applying and approved for SNAP with applications dated between May 1st and May 11th, we do plan to include their issuances in clean up files sent subsequent to May 2023.
- d. Names of state agencies involved in administering this plan.

Response: FSSA/Division of Family Resources and Department of Education

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.
 Schools have been informed of the school eligibility requirements for P-EBT being based on the period of closure or reduced attendance or hours must meet the minimum 5 consecutive day threshold this school year. For this school year, we are fully transitioned to the new DOE system of record for school attendance. This system does have specific coding for COVID related absences, and all schools have been informed and required to record this information when applicable. DOE does maintain enrollment and attendance information for all public and private schools throughout the State. DOE does have information in their system for accredited virtual schools but does not have any information on unaccredited virtual schools nor for homeschooled students.

Schools and DOE continue to be responsible for determining free/reduced lunch eligibility so if a student is added, the eligibility would be for the entire 2022-2023 school year. Schools collected school meal applications from all households at the beginning of the school year as required for P-EBT eligibility. For the sake of clarification, children whose families submit applications sometime in SY 22-23 would become eligible for P-EBT from the point of application submission through the end of the school year, but they would not be made retroactively eligible for P-EBT benefits prior to the date of application submission.

Non-NSLP participating in fully virtual or home school: for those applying and determined eligible for free/reduced lunch and P-EBT, the eligibility would be determined retroactively to the beginning of this current school year.

- 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.

The schools have been within the parameters for determining student eligibility for PEBT. Schools and DOE have been provided with the P-EBT school eligible requirements as well as student eligibility for NSLP and how to arrive at countable student days. Countable student days for P-EBT consideration would include for quarantines, other absences due to COVID related illness and approved virtual learning days for COVID related reasons. Schools have been informed that no other absences beyond this list would be allowable for P-EBT countable days. DOE has continued throughout this current school year with their communications to schools on coding of COVID related absences in anticipation of a P-EBT plan being approved. The following information is on the FAQ document to Schools: For students at home and engaged in academic programming 'virtually' (one-to-one device, packet pickup, course work emailed, etc.) due to any COVID reason, the Virtual Due to COVID attendance type is most appropriate. Virtual Due to COVID attendance types count as eligible days for determining PEBT eligibility if the student is enrolled at a school participating in the NSLP (National School Lunch Program). If the student is doing course work 'virtually' which may include one-to-one device without teacher participation, packet pickup, work emailed, etc., report Virtual Due to COVID. Students that may temporarily not be engaged in academic programming for absence due to having COVID, being quarantined or for any COVID related reason ARE also eligible for P-EBT benefits.

Non-NSLP participating in fully virtual or home school: An application portal will be created that leverages Family Education Rights and Privacy Act (FERPA) and other applicable security controls to support secure interaction. The portal design will be simple and compliant, while including all necessary functionality and requiring the client to acknowledge and confirm their understanding of pertinent interaction

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.

requirements. We are targeting the 2nd week of March 2023 for the portal to be active for homeschooled and virtual households to apply. Some example data elements may include:

The client will be taken to an application page that allows them to enter necessary personal information. This application will include the portal providing applicable federal and State rights and responsibilities information, a verification of addresses entered by the client (using a USPS address validation tool), and other data gathering to be validated against Department of Education (DOE) data (to confirm the student applicant was previously enrolled in an eligible school and withdrew during the PHE). Some basic example data elements of the application screen may include but not limited to:

- Parent/Guardian First Name
- Parent/Guardian Last Name
- Parent/Guardian DOB
- Parent/Guardian Email
- Parent/Guardian Phone
- Child Name
- Child Grade
- Child DOB
- Child Gender
- Child School (last attended from NSLP Schools)
- Parent/Guardian Address
- Parent/Guardian Mailing Address
- Child Student Number

After successful submission of the application by the client’s family, the State will need to review and approve and/or deny the application based on the client-provided data and verifications conducted by the State. Once an application is submitted for review and determination is made, the client will have the ability to view their final determination result, once it is available. Additionally, a Frequently Asked Questions (FAQ) page and further support details will be available to the client regarding helpdesk support and troubleshooting.

Indiana will conduct a public information campaign to encourage households of potentially eligible children to apply for benefits through the state’s P-EBT website portal. The 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.

As noted earlier in this section, we will develop an application that consists of a school year 2022-2023 free and reduced-price meal application, requiring applicants to provide documentation for all income sources, and requiring applicants to respond to a set of supplementary questions to confirm the remaining eligibility criteria. 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. Applicants will be required to 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. DOE does not maintain a list of virtual or home schooled children other than accredited virtual schools. Should there be a continued issue with the child’s proof of identity, we will reach back out to

the applicant for further verification such a birth certificate. The portal will have an upload feature for the applicant to provide the proof. We may opt to use the IEDSS eligibility system should the applicant have issues in providing a birth certificate and states that they had previously been on one of our public assistance programs.

For non-K-2 children previously enrolled in an NSLP participating school, we 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.

We will collect information (such as but not limited to SNAP case number) to determine if on direct certification list and thus categorically eligible for free meals; we 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 school district does not participate in CEP, we will confirm income eligibility through the free and reduced-price meal application portal.

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 applications in the first month of the P-EBT application's availability; other households will be assumed income eligible from the date of the application,

Indiana will use the income documentation provided by applicants to verify eligibility as follows:

- 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,

Indiana will provide USDA the opportunity to review the application prior to implementation,

- 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.
This will be determined based on the schools' attestation that students did not have access to meals at school. This same procedure would apply regardless of public or 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.).

The DOE database is continuously available to school staff for updating of student information.

- 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.
- Each of the schools and their respective school districts are responsible for confirming student eligibility for NSLP and P-EBT and reporting this information into the DOE database. The schools have been informed of the P-EBT eligibility requirements and are reporting eligible P-EBT days based upon these requirements. DFR staff are responsible for providing P-EBT policy and programmatic information to all partners. DFR also maintains communications with schools on eligibility requirements via the website, e-mails, and calls. DFR will continue to process the address change forms submitted by those whose children receive P-EBT and in turn we issue new P-EBT cards to the new address reported via Conduent EBT. Data warehouse is responsible for analyzing the data file received from DOE and communicating and confirming with DOE on any questions or concerns related to the data as DOE is the system of record. Conduent EBT receives the file from data warehouse and loads P-EBT benefits into accounts.
- 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).

DFR will be responsible for setting up and managing the portal for the home schooled/virtual population that applies for free/reduced eligibility and in turn opts to receive P-EBT benefits.

DOE is responsible for maintaining the school reporting database that tracks COVID related absences. Also DOE will provide match information for those applying for free/reduced lunch and are homeschooled/virtual to confirm previous NSLP school attendance.

- 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]

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.
As noted in responses above, schools have been provided the specific information needed on P-EBT eligibility both at school and student level. This information is collected through the new State DOE database system.
- 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?
Schools have been provided the specific information needed on P-EBT eligibility both at school and student level.
- 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.)
Student information will be obtained from the new State DOE database in which all schools are required to report attendance information including any COVID related absences.
- 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.
For the homeschool and virtual population, we will be confirming with DOE that the children applied for were part of a NSLP. However, we will through the portal confirm with the parent that the student was taken out of the NSLP school due to COVID.

Response: [please use as much space as needed]

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.

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.

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?
- 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]

Responsible state agencies

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

- **Indiana FSSA/Division of Family Resources and Indiana Department of Education.** We will rely on FNS provided CACFP data should that be more up to date than what is provided by DOE.

Identifying SNAP Enrolled Children

- **Indiana** 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. This will include those who apply for SNAP between May 1st and May 11th, 2023 and are approved.
- 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. [See [P-EBT Q&A #28](#) for additional detail.]
- *Indiana* understands that a child’s eligibility for P-EBT child care benefits ends when a child’s SNAP enrollment ends.
- *Indiana* 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.

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, *Indiana* 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.
- *Indiana* 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

- *Indiana* 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 *Indiana*’s anticipated distribution of fall semester P-EBT child care benefits in May 2023, the state will use fall 2022 CACFP claims data for the months of August 2022 through November 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 apart from May 2023. Since the federal PHE is ending on May 11, 2023, the May 2023 benefit will be based on 9 instructional days. 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

Fall Semester				Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		
August 2019		August 2022		
September 2019	835,642	September 2022	664,285	
October 2019	950,085	October 2022	644,946	
November 2019		November 2022	TBD	
Total	TBD	Total	TBD	TBD

Note:

2019 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 final monthly fall P-EBT benefit (with at least 2 months of CACFP), *Indiana* 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.

Calculations will be based on the August 2022 through November 2022 comparisons from table above:

Note: Adult centers are not included in these counts

% difference between 2022 and 2019 = TBD

Maximum days for Fall Semester

180 instructional days/10 months (August 2022 – Dec 2022) = 18 days per month

$$\begin{array}{rclclcl} \text{AVG Days} & 18 & \times & \$8.18 & = & \$147.24/\text{mo} \\ \text{TOTAL} & \$147.24 & & & \times & 1 \text{ month} & = & \$147.24 \end{array}$$

$$\$147.24 \times \text{TBD\%} = \$\text{TBD} \text{ monthly total P-EBT benefit}$$

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 May 2023, the state will use spring 2023 CACFP claims data for the months of January 2023 through February 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 apart from May 2023. Since the federal PHE is ending on May 11, 2023, the May 2023 benefit will be based on 9 instructional days.. 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

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		
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, Indiana 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.

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.

For the student P-EBT benefit, Indiana will issue student specific P-EBT benefit amounts for each month based on each student's number of approved virtual learning days and COVID related absences. Benefits are calculated for each month of the semester and will be issued on a retrospective schedule.

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	TBD%	18	\$8.18	\$TBD
Spring Semester	TBD%	18 (with exception of May 2023)	\$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.

We continue consistent communications with Conduent EBT and will ensure that the proposed schedule of issuance will be coordinated with them. Our current plan would be to load childcare P-EBT benefits by the end of May 2023 for the entire school year. As expected, most of these benefits will be loaded onto existing active SNAP EBT cards. This is estimated to be an average of 80,000 loaded onto current SNAP EBT cards and 16,000 would receive a new P-EBT card. We already have the existing communications set up for automated outbound dialer calls and updates to our P-EBT website to inform families/recipients of this issuance and the eligibility requirements.

For the student population, we anticipate being able to issue 1st semester benefits by the end of April 2023 and 2nd semester benefits by the end of May 2023. For the homeschool/virtual population, depending on the volume, it is possible to be issuing these benefits on a monthly basis should the volume of applications accepted remain low. We will be issuing these benefits no later than June 2023 so that we can prepare for our summer issuance to that eligible student population.

Based on the news release issued on January 31, 2023, the federal PHE will end on May 11, 2023. With that, we are responsible for ensuring that P-EBT eligibility determinations and benefits be calculated up to that date. Both the DOE system and our data warehouse have the system functionality to be able to determine benefits up to that date and no further. May 2023 school days can reasonably be estimated at 9 days of attendance. With

that, the 180 days of school year attendance will be reduced by 9 days. (18 days per month from August 2022 – May 2023 = 180 days – 9 days (May total of 18 days – 9 days) = 171 days. As noted previously, those with children under age 6 applying and approved for SNAP with applications dated between May 1st and May 11th will be considered for child care P-EBT and will be issued as part of clean up run of benefits should this information not be available by the end of May 2023.

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?
Since SNAP benefits receipt is a requirement of childcare P-EBT, most of these benefits will be loaded onto existing SNAP EBT cards. For those not currently receiving SNAP benefits, we will be issuing a P-EBT card in the name of the child.
- 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.
The State has several sub-benefit types still available and thus plans to use one of the different types to distinguish this childcare P-EBT benefit from any other benefit.
- 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.
We agree that P-EBT will be the 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.
The State will follow the same expungement rules that are currently followed 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?
This should not be an issue for childcare P-EBT since most of the benefits will be issued on the existing SNAP EBT card. This is estimated to be an average of 76,244 loaded onto current SNAP EBT cards and 15,186 would receive a new P-EBT card.
- 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: As noted previously, most of these childcare P-EBT benefits will be loaded onto existing SNAP EBT cards. For those not currently receiving SNAP, we will load and send a P-EBT card in the eligible child's name.

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.
The State has an e-mail box already established for taking such inquiries. Also, the current statewide DFR 800 number will be available and call script developed to handle inquiries concerning this benefit. The process of customer service for child care P-EBT matches the processes already in place for School age P-EBT. We do have some additional staff that can be added to assist with inquiries should the volume increase subsequent to issuance.
- 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.
Since the majority identified to receive these benefits are currently receiving SNAP benefits, we do not anticipate issues in serving these populations. For limited English proficiency, we do have immediate capabilities to translate any information as needed.
- 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).
As most are receiving SNAP, we will be reaching out to all with available phone numbers through automated outbound dialer messages to inform of this additional benefit. The State P-EBT website will be updated with this new benefit information. As well, we will update our FAQs, and communication with parents on eligibility. We will continue to post an address correction form on our website for parents to provide an updated address should the address in school file no longer be correct.

This is after each issuance and a replacement card will then be mailed to this new address.

- 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.
This information is contained on the buck slip with the P-EBT card noting that if do not wish to use the benefits that the card should be destroyed.
- 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?

For those not currently receiving SNAP, the buck slip information sent out with the P-EBT card does contain the information noted above. As well, the buck slip will contain reference to our P-EBT website for more information on the program. The buck slip is included as part of this plan submission for reference and will be posted on our P-EBT website.

Response: For those receiving SNAP benefits currently, we will contact each case through automated outbound dialer calls (aka “robo-call”). Further, our website will be updated with information on the Child Care P-EBT program. For those who are not currently receiving SNAP at the time of Child Care P-EBT is issued, we will be sending a new P-EBT card in

the child's name and the buck slip will be included which provides information on why they are receiving the card and benefit. In addition, we will be providing an updated message through our IVR system and will have an updated script for our staff who would be answering calls from the public. For the homeschooled and virtual population, we will inform through a public media campaign referring to our website and portal for more information and/or to apply for P-EBT.

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: The State confirms that we will not attempt to reclaim P-EBT benefits by reducing a household's SNAP benefit. Since P-EBT benefits are unsolicited benefits to many of the families receiving, the State does recognize that efforts must be taken to communicate and attempt to rectify questions and concerns. The State will research cases that come to our attention where perhaps custody recently changed such as to a guardian or custodial parent status changes. In these situations, if the benefit has already been spent, there is no further recourse available. If the benefit has not been spent, we are able to re-issue a P-EBT card for

the child. Indiana commits to completion of the USDA provided spreadsheet for all P-EBT overissuances.

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:

Adrienne M. Shields

Adrienne Shields
Director – FSSA/Division of Family Resources

Date of Request: 01/20/2023