

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

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

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

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

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 child care: **2 semesters of SY 2021-2022**
- 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 non-school children in child care
For first semester (Sept – Dec 2021), the estimated issuance total is \$14,046,084. We would be projecting that the second semester amount (Jan -April 2022) will be a similar issuance amount.
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of non-school children in child care
For first semester Sept – Dec 2021, an average of 97,542 per month of non-school children in child care will be provided P-EBT benefits. Number of children eligible per month for first semester:
September 2021: 97,149
October 2021: 98,394
November 2021: 98,207
December 2021: 96,419
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households **N/A**
 - School children in non-SNAP households **N/A**
 - Children in child care
The current plan would be to load these first semester Sept – Dec 2021) benefits during June 2022. Benefits would be loaded onto existing active SNAP EBT cards. For those not currently receiving SNAP benefits, we will issue a new P-EBT card for each child. This is estimated to be 80,494 loaded onto current SNAP EBT cards and 17,048 would receive a new P-EBT card.

¹ The date range covered by P-EBT State plan or amendment. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

4. P-EBT for Children in Child Care (see Q&As #25-33)

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.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

The State has completed a data extract from our eligibility system (IEDSS) to identify those children under age 6 receiving SNAP benefits for each of the months of the first semester SY 21-22. Each of these monthly counts is noted above under c. Benefits will be issued for all of the months that a child was actively receiving SNAP benefits and only for those months. All this population is deemed as enrolled in a covered childcare facility and with simplifying assumptions being requested, no further match is needed.

- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

The State has completed a data extract from our eligibility system to identify those children under age 6 receiving SNAP benefits in each of the months of September, October, November, and December 2021.

- 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 #29) See simplifying assumption below

- 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 that child's eligibility? 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?

See simplifying assumption below

- 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?

This is not applicable based upon the plan being submitted

- 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.) See simplifying assumption below

- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.) See below #1 and #2 and Section 5
- 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).

The Division of Family Resources under FSSA is primarily responsible for the determination of eligibility for childcare P-EBT with the use of the CACFP data received from our Department of Education.

What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

1. Meal access is reduced on a statewide basis
 - State as a whole is/isn't eligible for each month
 - One benefit amount for all children determined eligible, regardless of location of residence/child care facility.
2. A child under age 6 as of August 1, 2021, will remain enrolled in Child Care for the 2021-2022 school year
 - Children do not need to be assessed each month for age
 - Child Care enrollment does not need to be proven each month

5. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

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

Notes:
 1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
 Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

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

Response: [please use as much space as needed]

Child and Adult Care Food Program (CACFP) claims data is accessed to determine if:

1. Child Care meal access is reduced (yes/no)?
 - Fall 2021 compared to Fall 2019
 - Spring 2022 compared to Spring 2019
2. By how much is the access reduced? (rate determines benefit level for each semester)

	September through December 2019	September through December 2021
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CCC	2,157,431	1,510,092
Day care	1,165,479	968,131
Total	3,322,910	2,478,223

Note: Adult centers are not included in these counts

% difference between 2021 and 2019 = 25.42%

Maximum days for Fall Semester

September	21				
October	21				
November	20				
December	17				
AVG Days	20 (rounded up)	x	\$7.10	=	\$142.00/mo
TOTAL	\$142.00	x	4 months	=	\$568.00

\$568 x 25.42% = \$144 (rounded down) semester total P-EBT benefit

$\$144/4 = \36.00 *monthly benefit for Fall semester*

Spring Semester 2022 (Jan-May): TBD as is dependent upon the release of the CACFP data for this time period. Once received, if any of these months do not pass the reduced access test, will be dropped from the calculations.

Note: in regards to avg days being calculated at 20 per month, this matches up with our maximum required school days of 180/9 months = 20

Simplifying assumptions:

3. Meal access is reduced on a statewide basis
 - State as a whole is/isn't eligible for each month
 - One benefit amount for all children determined eligible, regardless of location of residence/child care facility.
4. A child under age 6 as of August 1, 2021, will remain enrolled in Child Care for the 2021-2022 school year
 - Children do not need to be assessed each month for age
 - Child Care enrollment does not need to be proven each month

In terms of ensuring no duplicate payments for a child under school and child care P-EBT, our data warehouse manages the files for both of these issuances. Thus, they can quickly match and exclude those under age 6 who have already received a student benefit.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between

them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).

- The timeline must include the State's tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

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 these childcare P-EBT benefits during the month of June if not sooner depending upon plan approval. As expected, most of these benefits will be loaded onto existing active SNAP EBT cards. This is estimated to be 80,494 loaded onto current SNAP EBT cards and 17,048 would receive a new P-EBT card. We already have the existing communications set up for robocalls and updates to our P-EBT website to inform families/recipients of this issuance and the eligibility requirements.

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 SY 2020-2021. 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.

- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?

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 80,494 loaded onto current SNAP EBT cards and 17,048 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?

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.

7. Customer Service

Recommended Standard for Household Support

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

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

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

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).

The State will release a statewide media statement concerning this new benefit. As most are receiving SNAP, we will be reaching out to all with available phone numbers through robo-call 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)

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.

- 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 receiving SNAP benefits currently, we will contact each case through robo-calls. As well, 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.

8. Over-issuance of P-EBT benefits

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

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

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to

pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

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

Response: 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.

9. Benefit Issuance Reporting

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

10. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

11. Release of Information

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

12. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

13. Administration of State P-EBT Plan

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

Signature and Title of Requesting SNAP State Agency Official:

Adrienne Shields, Director
FSSA/Division of Family Resources

Date of Request _____