

## Louisiana P-EBT Child Care Plan for School Year 2021-2022

### 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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment
  - for children in school
  - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
  - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households
  - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
  - School children in SNAP households
  - School children in non-SNAP households
  - Children in child care

### Response:

- The *date range* covered by this State plan or amendment
  - August 1, 2021 – May 31, 2022

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<sup>1</sup> 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).

- Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range.

Benefit Month	Total Expected Issuance Amount
Aug-21	\$2,263,678.40
Sep-21	\$2,215,343.55
Oct-21	\$2,291,134.75
Nov-21	\$2,380,440.85
Dec-21	\$2,424,802.05
Jan-22	\$2,911,199.24
Feb-22	\$2,880,856.72
Mar-22	\$2,817,783.36
Apr-22	\$2,869,240.80
May-22	\$2,944,554.30

- Estimated total **number** of children to which the State will issue P-EBT benefits.

Benefit Month	Expected Count for PEBT Child Care Issuances
Aug-21	100,832
Sep-21	98,679
Oct-21	102,055
Nov-21	106,033
Dec-21	108,009
Jan-22	107,266
Feb-22	106,148
Mar-22	103,824
Apr-22	105,720
May-22	108,495

- P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

October 5: PEBT-CC (Fall benefits)

October 12: PEBT-CC (Spring benefits)

## 5. 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.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- 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)
- 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?
- 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.)
- 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.)
- 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).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

## **Responsible state agencies**

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

- Louisiana Department of Children & Family Services

## **Identifying SNAP Enrolled Children**

- The state will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- The state understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- The state 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 through April 2022 relative to the same months immediately prior to the pandemic.
  - For purposes of this plan, 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-44. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state's lunch claims for the fall semester.

## **Setting Benefit Levels Using the CACFP Data Method**

- The state 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. See Table 1.
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.
3. The school year 2021-2022 P-EBT benefit per day of \$7.10

**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 *[October, 2022]*, the state will only have access to spring 2022 CACFP claims data through *[April 2022]* and will use the reduction in claims through that month to calculate the first factor.
2. Before calculating its monthly spring P-EBT benefit, the state commit 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 CCACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

**Table 1: Reduction in CACFP lunch claims – fall semester**

Fall Semester				Percent Change, Fall Semester:
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		
August 2019	957,520	August 2021	803,937	<b>To be applied to daily rate and number of school instructional days per month.</b>
September 2019	841,147	September 2021	626,584	
October 2019	966,587	October 2021	733,738	
November 2019	811,732	November 2021	714,733	
December 2019	843,508	December 2021	765,074	
<b>Total</b>	<b>4,420,494</b>	<b>Total</b>	<b>3,644,066</b>	

**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	924,646	January 2022	646,916	
February 2020	822,519	February 2022	697,515	
March <b>2019</b>	909,222	March 2022	781,327	
April <b>2019</b>	981,053	April 2022	739,342	
May <b>2019</b>		May 2022		
<b>Total</b>	<b>3,637,440</b>	<b>Total</b>	<b>2,865,100</b>	

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

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit
Fall Semester	17.56%	18	5	\$ 7.10	\$ 22.45
Spring Semester	21.23%	18	5	\$ 7.10	\$ 27.14

**7. Implementation Timeline, EBT Processing, and Benefit Issuance**

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

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to SNAP State agency (Day #5)
  - P-EBT hotline becomes active (Day #9)
  - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

**Response:**

It is Louisiana's goal to begin issuing P-EBT benefits in October 2022. The feasibility of this will depend on the date of plan approval. The state may need to change the issuance schedule depending on when the plan is approved. The approach is as follows:

- October 5: PEBT-CC (Fall benefits)
- October 12: PEBT-CC (Spring benefits)

Several previously approved sections from the State Plan for Pandemic EBT Children in School and Child Care, 2020-2021 will continue to be applicable to the State Plan for Pandemic EBT Children in School and Child Care, 2021-2022. Those sections can be reviewed in the State Plan for Pandemic EBT Children in School and Child Care, 2020-2021 and include:

- 8. Customer Service
- 9. Over-issuance of P-EBT benefits
- 10. Benefit Issuance Reporting
- 11. Administrative Funding
- 12. Release of Information
- 13. Civil Rights
- 14. Administration of State P-EBT Plan