

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

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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) 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:** Louisiana

2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021;
American Rescue Plan Act of 2021

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

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

Response:

- a) Date Range:
 - Louisiana proposes to build off its previously approved P-EBT plans for the school year and child care, 2021-2022. The date ranges for the current plans will be from August 1, 2022 through May 11, 2023. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this plan.

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).

b) Estimated Monthly and total amount of P-EBT benefits:

- School Year:** Louisiana proposes to issue approximately \$527,047 monthly through the end of the PHE (May 11, 2023). This approximate amount was calculated by using August 2022 – October 2022 data provided by LDOE as a baseline. The total average number of students eligible for P-EBT in the first 3 months of the school year is 3,746 students per month. Louisiana is to issue benefits in a tiered approach based on the number of days missed monthly. The tiered approach is based on this chart:

Tier	# of days absent	Benefit amount
1	1 to 5 days	\$24.54 (3 days)
2	6 – 15 days	\$81.80 (10 days)
3	More than 15 days	\$147.24 (18 days)

This chart provides the number of eligible children by month as if they were all Tier 3 for the first 3 months of the 2022-23 school year:

Tier 3		
August 2022	3,759	\$553,475
September 2022	3,775	\$555,831
October 2022	3,705	\$545,524
Averages	3,746	\$551,561

Based on max Tier 3 for August through April 2023 and max Tier 2 for May 2023, Louisiana can be expected to issue \$5,270,472 in total P-EBT benefits.

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

Benefit Month	Total Expected Eligible Children	Total Expected Issuance Amount
August 2022	112,527	TBD
September 2022	117,998	TBD
October 2022	123,321	TBD
November 2022	117,948	TBD
December 2022	117,948	TBD
January 2023	117,948	TBD
February 2023	117,948	TBD
March 2023	117,948	TBD
April 2023	117,948	TBD
May 2023	117,948	TBD

- c) Total approximate number of students eligible for P-EBT in August – October 2022 is 3,746. Total approximate number of child care children eligible for P-EBT in August – October 2022 is 117,948.
- d) The state intends to issue P-EBT benefits retroactively the month after plan approval for all eligible recipients. Child Care benefits will be issued after School Year benefits in order to avoid issuing duplicate benefits. The following is the tentative issuance schedule and FNS will be notified of any changes prior to the change:

SY 2022-2023

May 2023: August 2022 - April 2023

June 2023: May 2023

Child Care 2022-2023

July 2023: August 2022 - December 2022

July 2023: January 2023 - May 2023

- e) The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:
 - Louisiana Department of Education
 - Louisiana Department of Children and Family Services

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

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

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined “other source categorically eligible” for SY 2021-2022, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application **and** the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully

virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

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

Response:

- To identify eligible school children and confirm their eligibility, Louisiana Department of Children & Family Services (DCFS) will use data provided by the school districts. DCFS will instruct school districts to upload a list of currently enrolled students who are eligible for Pandemic EBT via a portal. Eligible students include:
 - The children eligible for free or reduced-price meals. This includes children who are:
 - i. directly certified or determined “other source categorically eligible” for SY 2022-2023, or
 - ii. Certified through submission of a household application processed by the child’s school district for SY 2022-2023 (to include all families of new students, such as kindergarteners, and to any family

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.

that may have become newly eligible for free or reduced price meals this year), or

- iii. Enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, or
 - iv. Children will not be determined eligible for P-EBT benefits in SY 2022-2023 based on prior year free and reduced price benefits. All schools will use new eligibility determinations this year for P-EBT and none will use free and reduced price lists from prior school years.
- The Louisiana Dept. of Education (LDE) will upload only students certified as eligible for Free/Reduced priced meals. Each month will be uploaded separately allowing newly certified students to be eligible beginning their first month of eligibility. SNAP and non-SNAP students, public and private students, and homeschool due to COVID students will be certified for P-EBT using the same criteria
 - Public and private schools must be closed or operating at reduced attendance or hours for 5 consecutive days during SY 2022-2023 for a student to receive P-EBT benefits. Once a school meets the minimum 5 consecutive day threshold, during SY 2022-2023, then that school does not need to meet that threshold again for the duration of the current federal public health emergency.
 - Public and private school districts are required by the state to track a school's learning mode (i.e. virtual, hybrid or fully in-person) and attendance data including if a child's absence was due to COVID. A school's learning mode classification, along with number of absences due to COVID will confirm their access to meals at school and P-EBT benefit level. Schools will also be responsible for identifying which students are enrolled in virtual classes 100% of the time or hybrid due to COVID and sharing this information with DCFS.
 - Public and private school districts will identify homeschool students who left their NSLP participating school due to COVID concerns and determine their eligibility for P-EBT.

In general, a homeschooled child or a child attending a non-NSLP-participating virtual school is eligible for P-EBT benefits if the child meets all three of these requirements:

- i. the child previously attended an NSLP-participating school at some point after the start of the COVID health emergency, **or** the child enrolled in kindergarten as a virtual or homeschooled student in school year 2020-2021 or later,
- ii. the child is not attending an NSLP-participating school *due to concerns about COVID*, and
- iii. the child would have received free or reduced price meals at their NSLP school if not for their virtual or homeschooled status.

The Parent/Guardian will apply in person for P-EBT at their participating local public school. Households will provide the name of the child’s previous NSLP-participating school, and the school district will validate the child’s previous enrollment using prior year school enrollment records. In situations where the child started school as a kindergartener in school year 2020-2021 or later and has always been homeschooled or has always been enrolled in a non-NSLP-participating virtual school, the local school district will validate current enrollment in a non-NSLP virtual school or confirm the child’s homeschooled status. The Parent/Guardian will attest using an FNS approved attestation statement that their child either left a NSLP participating school or began homeschooling since January 27, 2020 due to COVID concerns. The Parent/Guardian completing an application will provide proof of income eligibility for free or reduced meals at the time of application. Louisiana will verify income on all applications. Homeschool children will be submitted for benefits along with all hybrid/fully virtual students once eligibility for P-EBT has been established.

- The following entities are involved in the administration of P-EBT:
 - The Department of Children and Family Services (DCFS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to customers and provision of customer service and support.
 - The Louisiana Department of Education (LDE) trains local school districts how to make free and reduced eligibility determinations and provides continuous support throughout the school year. Local school districts determine school meal eligibility and track student learning mode classifications.

LDE and DCFS will work in conjunction to resolve any issues or concerns regarding P-EBT.

- The state intends to leverage simplifying assumptions to issue benefits based on three tiers, (more details are provided in the Benefit Level section). The tiers are based on this table:

Tier	# of days absent	Benefit amount
1	1 to 5 days	\$24.54 (3 days)
2	5 – 15 days	\$81.80 (10 days)
3	More than 15 days	\$147.24 (18 days)

The state plans to issue P-EBT retroactively as indicated in the above response. DCFS will request that school districts provide any updates to a school’s learning mode via the portal as outlined in Implementation Timeline, EBT Processing, and Benefit Issuance section below.

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the state will identify, confirm and monitor the status of individual schools. Also describe how the state will identify the period of duration of the closure, reduced hours, or reduced attendance of the state's schools.
- How will the state confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the state will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response:

To be eligible, the school must meet the minimum 5 consecutive day threshold (either closed for 5 days or operating at reduced attendance or hours for 5 days) and be eligible for free or reduced-price meals under the regular NSLP guidelines. Students will receive an average P-EBT benefit for days that they do not attend in person and do not have access to a meal service at the school due to COVID-19. Louisiana schools will track the learning mode for each student (fully virtual, fully in-person or hybrid). Louisiana will identify, confirm and monitor the status of individual student for P-EBT eligibility through bi-monthly reporting from school districts. DCFS and LDE will provide guidance to each district on how to classify and report a student's learning mode. All students in a fully virtual or hybrid learning mode who are eligible for free or reduced-price benefits under normal NSLP rules will be eligible for P-EBT. Districts or schools operating fully in-person will have eligible students if they meet the following criteria:

- Students who opt into fully remote learning (classified as "virtual" for the purposes of benefit calculation), or
- Students who are not able to attend school due to COVID-19 exposure (classified as "hybrid" for the purposes of benefit calculation).

5. P-EBT for Children in Child Care

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).

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.

- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

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

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

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

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 Education
- Louisiana Department of Children and Family Services

Identifying SNAP Enrolled Children

- Louisiana will identify non-school children who began school year 2022-2023 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that non-school children who began receiving benefits as a 5-year-old earlier in school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- Louisiana understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- Louisiana 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, Louisiana 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.
- Louisiana 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

- Louisiana will set an average monthly P-EBT child care benefit for the fall semester, a separate average monthly benefit for the spring semester, and a separate benefit for the prorated month of May. 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 Louisiana's anticipated distribution of fall semester P-EBT child care benefits in early July, 2023, the

state will use fall 2022 CACFP claims data for the months of August through December.

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 2022-2023 P-EBT benefit per day of \$8.18

Table 1: Reduction in CACFP lunch claims – fall semester

Fall Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:
August 2019	TBD	August 2022	TBD	To be applied to daily rate and number of school instructional days per month.
September 2019	TBD	September 2022	TBD	
October 2019	TBD	October 2022	TBD	
November 2019	TBD	November 2022	TBD	
December 2019	TBD	December 2022	TBD	
Total	TBD	Total	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 fall P-EBT benefit, Louisiana commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the fall semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Spring Semester Benefit:

1. The spring semester benefit will be calculated as above, but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of spring semester P-EBT child care benefits in late July, 2023, the state will use spring 2023 CACFP claims data for the months of January through April.

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 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	TBD	January 2023	TBD	
February 2020	TBD	February 2023	TBD	
March 2019	TBD	March 2023	TBD	
April 2019	TBD	April 2023	TBD	
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, Louisiana commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

May Benefit:

1. The May benefit will be calculated using the same Percent Change as determined above for the spring semester. See Table 2.
2. The actual number of school instructional days (9) in May.
3. The school year 2022-2023 P-EBT benefit per day of \$8.18

6. Benefit Levels

Standard for Benefit Levels

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

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

Notes:

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

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

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

Response:

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	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit
Fall Semester (Aug-December)	TBD	18	5	\$8.18	
Spring Semester (January-April)	TBD	18	4	\$8.18	
May 1- May 11	TBD	9	1	\$8.18	

Notes:

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

7. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

Please also address each of the following:

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

Response:

School Year:

It is Louisiana's goal to begin issuing P-EBT benefits in May 2023. 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 and how the timeline intersects with the holidays. The tentative approach is as follows:

Day 0 – Plan approval is received.

Day 1 – Inform school districts of the reporting criteria and the process for uploading their data to the portal Including instructions for submission.

Day 10* –deadline for school districts to submit files. By day 10, schools will upload student data for August 2022 through April 2023.

By day 40, schools will upload student data for May 2023.

Day 11 - Public awareness campaign commences.

Day 12* – File transfers to EBT processor INMAR, notice production begins

Day 13* – P-EBT cards will be mailed to the home address provided to DCFS from the local schools. Benefits will be posted and available on cards being mailed and clients are notified via social media, website, via community advocates.

Note: three to five days may need to be added to these dates based on weekend and holiday schedules.

For ongoing issuances, Louisiana intends to issue P-EBT benefits for multiple months on a retroactive basis. Students and parents were encouraged to retain their P-EBT card from last school year, however, we recognize that not all students kept their cards, therefore, we will work with INMAR to issue P-EBT cards as needed. All eligible school districts will provide the state with a list of students eligible for free and reduced-price meals and their respective learning modes by the designated due dates. This allows for the necessary data clean up and file transfer to the state's EBT processor, INMAR Louisiana issues SNAP benefits from the 1st through the 20th of each month. Louisiana issues SNAP benefits based off the last two digits of the social security number. Issuing P-EBT benefits on the 20th of the month allows for us to conclude our monthly issuance cycle. Louisiana has reached out to INMAR and this P-EBT will be operated using the same contract language as the prior P-EBT. The draft P-EBT plan has been shared with INMAR.

The state intends to adhere to the following distribution model: P-EBT Students will receive their benefits on a P-EBT card for this round. The cards will have the same look as SNAP EBT cards (Louisiana Purchase) but all P-EBT card numbers will have '99' as the first two digits making them slightly different than 'regular' EBT cards. Each month, P-EBT benefits will go on the same card. New P-EBT cards will be accompanied with a flyer that explains that the P-EBT card has the name of the student. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. For families whose cards have been lost or damaged, a replacement card request process via the P-EBT customer service assistance line will be available. The state will continue its use of the P-EBT benefit code which was modified specifically for P-EBT. P-EBT benefits will be identified on the system separate and apart from all other benefit types, including regular SNAP, DSNAP,

supplements (emergency allotments), and replacement benefits. Since the P-EBT cards will only have P-EBT benefits and no card will have both P-EBT and SNAP, there is no draw/spend priority. Undeliverable cards will be returned to INMAR. INMAR will provide the state with a report listing P-EBT cards that were returned, deactivated, and destroyed.

Child Care:

It is Louisiana's goal to begin issuing P-EBT benefits in July 2023. 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:

- July 2023: P-EBT-CC (Fall benefits)
- July 2023: P-EBT-CC (Spring and May benefits)

8. Customer Service

Recommended Standard for Household Support

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

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

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

- How will the state resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the state's public information campaign. That is, the information you will provide to the general public (i.e., ***not directly*** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

LA DCFS will utilize a customer portal and our Customer Support help line to field any calls received related to P-EBT issuances. This hotline is handled by a dedicated manager and staff. These staff are empowered to research and address such cases. State staff can update addresses, issue EBT cards, and check eligibility. DCFS Policy, Systems staff, Call Center staff, and LDE staff work in collaboration to resolve disputes and/or issuance errors. When necessary DCFS works with the appropriate school food director to validate information that is disputed by the client. Once validated, DCFS works with the Contractor, Deloitte to correct and/or issue corrected benefits; this is on a case by case basis.

DCFS will identify all eligible children, the children are not required to complete any type of application and are not required to do anything further to receive P-EBT benefit. If identified as receiving and or eligible for free or reduced-price meals, the child will receive the P-EBT benefit. The data utilized for each issuance is the most current data

received from schools to ensure that the P-EBT cards and benefits are issued to the correct addresses and all eligible children receive the benefit. LA DCFS has access to a point of contact with the School Districts and works closely with different advocates to address all the stated barriers. It is the intention of DCFS to use the child's state issued school ID in lieu of Social Security Numbers. Since there will be a Direct Certification process instead of an application process, we do not believe there will be any access issues.

Informing and engaging P-EBT participants and other primary and secondary audiences in P-EBT will be essential to the program's success. Louisiana DCFS proposes the following:

Interactive Online Portal

The hub of DCFS' communication effort will be its online P-EBT portal. The online portal will provide P-EBT information and assistance in an easy-to-navigate format. DCFS will collaborate with community partners in an effort to ensure the portal responds to the needs of the families it serves. The portal will feature the following:

- Basic information about the purpose of the P-EBT program and how to use the program, presented with family-friendly graphics and links.
- Links to customer service and assistance for common issues with P-EBT cases, EBT card activations, card balances, etc.
- Frequently-asked questions and tips in a user-friendly format
- Accessibility features, to allow users to view the portal in multiple languages and for ease of access

Mass Text and Phone Messages

DCFS will drive clients to the portal through regular mass text alerts. Targeted alerts will be sent to all SNAP households, SNAP households with school-age children, SNAP applicants, Disaster SNAP participants and previous P-EBT participants. Mass texts about food assistance and disaster food assistance in 2020 helped prompt a 300 percent increase in visits to the DCFS website, primarily to the pages devoted to food assistance. DCFS will also use phone messaging where a longer or more nuanced message may be required. The department will also provide sample text and phone messages for schools and school districts to use in communicating directly with families who are eligible for the program.

Flyers and/or push cards

DCFS will produce printable flyers and/or push cards for schools, partners and other stakeholders to use online and in person with potential P-EBT participants. The design will incorporate the same graphics and messaging as the online portal and feature the portal as the hub for P-EBT information, tips and assistance.

Social media campaign

Social media played a major role in communication around the first P-EBT application period in spring 2020. DCFS will develop social media graphics as part of a campaign to provide information and encouragement to families every step of the way, as they navigate the P-EBT program. The primary goal will be to direct households to the online portal for more information.

Media Announcements

DCFS will make major announcements about the availability of the program and its progress through press releases to all major news outlets, stakeholders, partners and public officials. Press releases are posted online and shared through social media. DCFS will provide messaging and talking points to the Governor's Office and other public officials and partners for their use in communicating about the program.

LAHelpU Customer Service Center Interactive Voice Response System (IVR)

DCFS will place on-hold recorded messages on its LAHelpU IVR to reach primarily households served by DCFS.

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:

DCFS will make all reasonable efforts to prevent over-issuances and improper payments. The DCFS PEBT system prevents duplicate issuance within the payment process using qualifying criteria provided by school agencies and where applicable parents. Because P-EBT benefits will be issued unsolicited to families, the State does recognize that efforts must be taken to communicate and attempt to minimize questions and confusion. In the event that an overpayment is made, DCFS will investigate the cause and if applicable refer the case to the state's Fraud and Recovery section for a cost-benefit analysis of a recovery. No attempt will be made to reclaim P-EBT benefits by reducing a household's SNAP benefit. DCFS will notify USDA, through the Southwest Regional Office, as soon as it discovers a P-EBT over issuance. DCFS will complete the over-issuance spreadsheet provided by USDA. The spreadsheet will document the size of the overpayment, the number of children affected, the reason for the error, and a thorough explanation of the corrective action that the state will take or has taken to prevent a recurrence of the error.

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:

Timothy Jenkins
Economic Stability Director
Louisiana Department of Children & Family Services

Date of Request: 03/02/2023