

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022
Document ID:	
Z-RIN:	
Date of Issuance:	August 26, 2021
Replaces:	N/A
Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 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 School and Child Care, 2021-2022

1. State Massachusetts:

- 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. - 478,600
 - 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 for this plan is School Year 2021-2022 (SY21-22) defined as beginning on 8/30/21 and ending on 6/23/22.

Based on SY20-21 P-EBT numbers, approximately 478,600² students are eligible for P-EBT. This equates to approximately 47% of the 1,015,857 students enrolled in public and private

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).

² Based on Summer P-EBT numbers removing 2021 graduates and students who moved out of state

schools in Massachusetts. Below is a chart informed by this logic and using the best available data.

Absence Range	Total number of excused absences in each range ³	Average number of excused absences per month ⁵	Estimated number of excused absences for P-EBT eligible students per month ⁴	Average cost per month	Total cost to date	Estimated total cost of P-EBT for SY21-22
1 – 5 days	497,086	82,848	38,938	\$1,362,844.12	\$8,177,064.70	\$13,628,441.17
6 – 15 days	82,164	13,694	6,436	\$688,671.26	\$4,132,027.56	\$6,886,712.60
16+ days	15,000	2,500	1,175	\$217,375.00	\$1,304,250.00	\$2,173,750.00
Total	579,250	99,042	46,550	\$2,268,890	\$13,613,342	\$22,688,904

Massachusetts intends to issue P-EBT benefits on a retroactive basis. The state will issue one lump sum payment on April 25th covering eligible days accrued from September 2021 – March 2021. After the initial lump sum payment Massachusetts will follow the same monthly issuance cycle utilized in the approved SY20-21 P-EBT plan.

4. P-EBT for School Children (see Q&As #6-24)

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.

³ Reflects data captured from September 1, 2021 – February 25th, 2022. Data does not include all districts, such as Boston Public Schools, and ineligible excused absences have not been backed out.

⁴ 47% of total student absences

⁵ Averaged over six months (September – February)

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals⁶? 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), and children who become eligible during the school year.
- 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.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- 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.

Response:

The following entities are involved in the administration of P-EBT:

- The Department of Transitional Assistance (DTA) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.
- The Department of Elementary and Secondary Education (DESE), in collaboration with the local school districts, is responsible for eligibility determination through the direct certification process, the NSLP application process and the monitoring and collecting of student learning mode classifications.

To identify eligible school children and confirm their eligibility, Massachusetts will use data provided by the school districts. DESE will instruct the districts to use last year’s P-EBT list, remove students who have graduated or moved out of district from this list and add students newly eligible by way of direct certification, students from newly eligible CEP schools, through other categorical eligibility sources or via the SY21-22 National School Lunch Program (NSLP) approved household applications (i.e., non-directly certified recipients). Using this list, districts will communicate to DESE the number of eligible absences by eligible student for the months of September – January, February – April and May - June.

⁶ 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.

Massachusetts will continue to assume P-EBT eligibility back to the start of the school year for newly eligible students in SY 21-22. School districts have not historically been asked to track individual student approval dates throughout the year for the purposes of determining P-EBT eligibility. Given the administrative burden associated with running P-EBT and accounting for the additional responsibilities of school administrators, it would be overburdensome to ask school districts to reorganize P-EBT data collection mid-year for SY 21-22.

Additionally, school districts and households have not prioritized collecting school meal applications, as they would have in previous years, since school meals continue to be universally free. For the purposes of P-EBT eligibility school districts have continued to have students fill out school meal applications and nutrition directors have been conducting direct certification. These checks have not occurred as frequently as in regular school years since the application and direct certification is largely irrelevant for the purposes of accessing school meals. As such, it can and should be assumed that households have been slower than usual in sending school meal applications to schools and school districts have been slower than usual in conducting direct certification considering meals are universally free, participation is up and their time and energy has been spent addressing persistent supply chain disruptions. Therefore, it is highly likely a newly eligible student for SY 21-22 would have been approved earlier in the school year if it was a regular school year. So, to not penalize households for these unusual, burdensome circumstances, Massachusetts will continue to assume eligibility back to the start of the school year.

Eligible absences

For the purposes of determining P-EBT eligibility the state will utilize FNS guidance provided on October 15, 2021⁷, specifically:

*Any absence where the school **directs** students to stay home for a COVID-related reason. As long as students are home at the school's direction, and the school is acting out of "concern" about COVID¹⁹ then these are P-EBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school's or the state's protocol for managing COVID outbreaks, positive tests, potential exposure, etc. USDA will not second-guess any state or school that **directs** students to stay home for COVID-related reasons.*

School districts will be advised to report only P-EBT eligible excused absences and remove all ineligible absences from the list sent to the state. School districts will use their judgement to identify COVID related absences in accordance with Protocols A – C of the state's COVID absence policy⁸. In discussions with state education leadership the state is

⁷ Guidance provided in email entitled "P-EBT Clarification on COVID-related absences"

⁸ Visit <https://www.doe.mass.edu/covid19/on-desktop/protocols/protocols.pdf> for Massachusetts COVID absence policies and protocols

confident in school district's ability to isolate COVID related absences from regular excused absences. In instances where school districts are unable to isolate COVID related absences the state will work with the district to assess the district's ability to capture consecutive absences. Should a district be able to capture consecutive absences then all students with 5 consecutive absences or more will be automatically issued P-EBT while all other students will be captured through a reconsideration process. In instances where a school district is unable to identify consecutive absences the state will work with that district to set up a reconsideration process. The state commits to re-evaluating the definition of COVID related absence should its COVID attendance policies change.

In response to the guidance provided in the P-EBT Q&A addendum provided on January 21, 2022, specifically section 1.a., the state will monitor and follow up on any outlier districts beginning March 1, 2022⁹.

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 the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition,

⁹ Beginning on this date accounts for the volatility caused by the Omicron variant and time periods when vaccines were not available for all school-aged children.

please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response:

At the time this plan was developed, all Massachusetts schools have resumed 100% in-person learning with no parental opt-out option. In some isolated instances, schools may secure a waiver from the state to allow for a temporary switch to remote learning in response to high COVID positive rates. No virtual learning days beyond those which occurred while under said waiver will be eligible for P-EBT.

In cases where an entire class or school closes for an extended period, the state will advise districts to add those days to the total number of eligible absences being reported for each student. For example, if a child has a total of 2 excused absences in a month and attends a school that operated remotely for 10 days in that month, the total number of P-EBT eligible days that will be reported for that child will be 12.

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.

Response:

Massachusetts removed childcare information from the plan at this time upon the request of USDA.

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 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:

The state intends to issue benefits based on the total number of P-EBT eligible absences accrued in one month’s time using the tiered chart below to inform how much each child is eligible for.

Absence Range	Total Amount of P-EBT	Actual Number of Days Paid
1 – 5	\$21.00	3
6 – 15	\$71.00	10
16+	\$128.00	18

Using a tiered approach mitigates the impact of “one-off” day discrepancies, thus limiting the number of client complaints directed at school administrative staff and keeping the volume of reconsideration requests to a manageable level. It is important to note that the burden of administering the program falls directly on the schools. Considering the FNS requirement that a reconsideration process be put in place, the only way to do so requires referral of families back to the schools. Putting schools in a position having to resolve “one-off” day discrepancies would be burdensome and fails to account for the additional work schools have taken on administering P-EBT in general.

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:

Massachusetts intends to issue P-EBT benefits on a retroactive basis. The state will issue one lump sum payment on April 25th covering eligible days accrued from September 2021 – March 2021. After the initial lump sum payment Massachusetts will follow the same monthly issuance cycle utilized in the approved SY20-21 P-EBT plan which issued benefits retroactively. For example, students will receive a payment on May 25th for eligible days accrued in April.

This data includes a list of students eligible for free and reduced-price meals and the number of qualifying excused absences. P-EBT benefits will be scheduled for issuance 15 days after receiving data from the school districts. This timing allows for the necessary data clean up and file transfer to the state's EBT processor, Conduent. Massachusetts issues SNAP benefits on a cyclical schedule; issuing on the 25th of the month allows for us to conclude our monthly issuance cycle.

The state intends to follow the same distribution model used in previous iterations of P-EBT. DTA households will receive their P-EBT benefits on their EBT card while non-DTA households will receive benefits on a unique P-EBT card. Unused P-EBT benefits will be expunged after 365 days. New P-EBT cards will not be universally issued to families who have already been previously issued a P-EBT card. For families whose card has been lost or damaged, DTA has developed an online replacement card request

portal and DTA is also accepting replacement card requests via its assistance line. The state will continue its use of the F9SS benefit code which was modified specifically for P-EBT. Currently the P-EBT draw/spend priority is last behind D-SNAP and SNAP. In consultation with Conduent, and in assessing the cost of the change order, the State has decided to keep this draw down order. Undeliverable cards will be returned to Conduent who will then provide the state with this information to share with school districts for outreach purposes (see proposal below in the “Customer Service” section).

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 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.
- 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:

DTA has a multi-faceted approach to ensuring robust and accurate communication to all eligible households regardless of primary language, lack of permanent address or access to technology. DTA's Assistance Line will continue to serve as front line customer support. To aid field staff in assisting callers, DTA has added a P-EBT page in its BEACON eligibility system to allow field staff to specifically investigate a child's P-EBT eligibility, benefit amount and card issuance status. Additionally, a specific internal email/inbox was created where field staff may forward issues that cannot easily be resolved to a dedicated team. This team will monitor this inbox and problem solve issues using records provided by the school districts. In instances where DTA is unable to locate a child in their records, or the family disputes the data provided by the school, the family will be referred to their respective school districts where issues of eligibility can be addressed.

DTA and DESE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with each school district's homeless liaison to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. School districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement, including signed attestations of P-EBT card receipt. At the end of the school year, the school district will be required to submit to DTA the signatures and any cards that were not picked up by families. DTA will continue its collaboration with the Department of Children and Families (DCF) established during the first round of P-EBT, which will inform DTA of

address/location updates for foster children. Collection of Social Security numbers (SSN) are not necessary to apply for NSLP, therefore children without SSNs may pursue eligibility for P-EBT through NSLP applications.

The state is also committed to serving all eligible children regardless of primary language. In the spring of 2020, the state stood up an independent P-EBT website, MAp-ebt.org, that is available in eight languages. In addition, all outreach materials have been translated into eleven languages. These materials will be shared with school districts to distribute to families.

Public Awareness Campaign: The state will conduct a public information campaign through use of the websites, Mass.gov/p-ebt and MAp-ebt.org, and social media platforms. The state will work with schools and community organizations to push out template emails, robo-calls as well as texts and flyers.

Direct Communication: After the first issuance, all eligible P-EBT children will receive a notice that will direct them to MAp-ebt.org or DTA's Assistance Line. The notice will include an explanation of P-EBT generally, eligibility rules for the program, benefit amounts, issuance cycles, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions and how to opt out. For newly eligible children, the notice will also include information on where to go for step-by-step instructions on how to PIN their card and what to do if they do not want to use the benefits. The notice is available in English and Spanish and is accompanied by DTA's translation card comprised of twenty languages. DTA is also actively working on an informational video in American Sign Language.

DTA will use the previously developed flyers, template robo calls/text/email language, social media posts and graphics in multiple languages housed on MAp-EBT.org. These outreach materials will be shared with schools, community organizations, and sister agencies. DTA tracks P-EBT card pinned rates by city and town and will use that data to continue partnering with school districts who have high rates of unpinned cards which may indicate that families may be having trouble accessing their benefits.

As mentioned earlier, DTA has built a replacement card request portal on its DTA Connect website. Included on this website are instructions on how to PIN a P-EBT card, obtain P-EBT account balances and request a new card. This information is available in five different languages. DTA has collaborated with its EBT processor, Conduent, to frontload a P-EBT specific message on their pinning hotline.

SNAP specific: P-EBT eligible households who also receive DTA benefits will receive a text message when benefits are issued, letting them know to check their balance via the Conduent IVR system, on DTA Connect or by calling the assistance line.

9. 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:

Massachusetts believes using the most up-to-date information available is essential to avoiding incorrect issuances. That is the main reason for DTA and DCF collaboration noted above which ensures the most up-to-date information is used in the issuance of P-EBT benefits to foster children. Moreover, the state has committed extensive time and resources to updating and correcting incorrect addresses. The state also remains committed to using all available resources to research and resolve issues related to child custody concerns, including the continued use of DTA's fraud unit to investigate claims of incorrect issuance. The state will contact USDA whenever issuance errors have been identified and provide a description of the error, the number of children involved, and the value of the over-issuance before issuing a corrected benefit to a different household and prior to attempting to reclaim any benefits. This plan reserves the state's right to take appropriate corrective action in cases of state 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, 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.

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.”

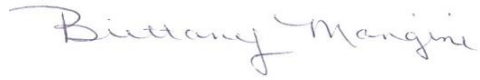
13. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the 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.

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:



Brittany Mangini
Director of Food Security and Nutrition Programs
Massachusetts Department of Transitional Assistance



Robert M. Leshin
Director, Office for Food and Nutrition Programs
Massachusetts Department of Elementary and Secondary Education

Date of Request January 13, 2022