

**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:** Maryland

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

Response:

The State of Maryland proposes to build on its previously approved plan to issue P-EBT benefits to eligible school and childcare recipients in School Year (SY) 2021-2022. The date range covered by this plan is August 27, 2021 through June 15, 2022. Maryland commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan (or subsequent amendment).

The estimated monthly and total amount of P-EBT benefits the State will issue within this plan/amendment's date range is **\$138,558,719**

- The estimated amount issued to school children in SNAP households is \$45,283,487.60

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).

- The estimated amount to school children in Non-SNAP Households is \$67,925,231.40
- The estimated amount of benefit for children on P-EBT based on the Childcare Eligibility provision is **\$25,350,000**

The estimated total number of children to which the State will issue P-EBT benefits is **358,189**

- The estimated number of school children in SNAP households is 113,276
- The estimated number of school children in non-SNAP households is 169,913
- Estimated number of non-school children in childcare is **75,000**

The tentative P-EBT issuance schedule is as follows:

School Children Benefit Issuance Schedule

- The State will issue benefits for the months of September 2021 through February 2022 in a single distribution in May 2022.
- The State will issue benefits for the month of March 2022 and April 2022 in a single distribution in June 2022.
- The State will issue benefits for the month of May 2022 and June 2022 in a single distribution in August 2022.

Child Care Children Issuance Schedule

- Fall Semester P-EBT benefits will be issued in a single distribution by the end of October 2022
- Spring Semester P-EBT benefits will be issued in a single distribution by the end of November 2022

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.

- 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 meals²? 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 Maryland Department of Human Services (MD DHS) and the Maryland State Department of Education (MSDE) will collaborate in SY 2021-2022 to issue P-EBT benefits.

The Local Education Agencies (LEAs) and private schools in Maryland will be the source for identifying P-EBT eligible school children. LEAs and individual private schools are already responsible for conducting eligibility determination for students seeking to enroll in the National School Lunch Program (NSLP). The MSDE will collect information on eligible students from each LEA and private school. The identification of students will be based on students' eligibility and enrollment in the National School Lunch Program (NSLP) for SY 2021-2022. Therefore, SY 2020-2021 graduates and other non-students will be excluded.

The LEAs and private schools will be responsible for identifying and confirming P-EBT eligible school children and providing the data to the MSDE. Eligible children include all students identified through Direct Certification and through household forms. Eligible students will also include all students enrolled in Community Eligibility Program schools and school systems during SY 2021-2022.

The LEAs and private schools will follow their processes for new households to apply and enroll children in Free and Reduced-Price School Meals programs. All LEAs will provide and process new NSLP applications for students and for families to determine those who may become newly eligible for free or reduced-price meals during SY 2021-2022. Benefits for the newly eligible children will be provided starting with the month the application was submitted.

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.

Students in any given school will become eligible for P-EBT benefits this school year 2021-2022 once the school is closed or has been operating with reduced attendance or hours at least 5 consecutive days due to the Pandemic Health Emergency (PHE).

The following State agencies are involved in the planning and execution of the P-EBT program activities for SY 2021-2022. The roles and responsibilities for each entity are described below:

- MSDE will work with Local Education Agencies (LEAs) to identify children eligible for P-EBT. The MSDE will develop a process for collecting the data from LEAs and private schools that meet the required timeline and include school and student data to support P-EBT. The MSDE will submit the data to the SNAP Administering Agency. The MSDE will continue to oversee the National School Lunch Program (NSLP) application process.
- MD DHS is the SNAP Administering Agency. The agency will develop and maintain systems to process P-EBT benefits; review, analyze, and cleanse data received from schools and LEAs via MSDE; work with the State’s Electronic Benefit Transfer (EBT) vendor to manage customer benefits; develop and implement a customer service strategy; and manage sub-contractors.

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, 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:

The Maryland State Board of Education and the Maryland State Department of Education continue to prioritize safe full-time, in-person instruction with minimal disruptions. MSDE and the Maryland Department of Health issued school guidance stressing layered public health strategies proven effective in keeping schools open to in-person instruction. MSDE is committed to supporting LEAs in the effort to keep public schools open for in-person instruction, especially with readily available state and federal resources. If an LEA feels that it must temporarily adapt to virtual learning at an individual school or in a targeted manner to keep its school community safe, the flexibility exists for the LEA to do so.

MSDE will work with each LEA to identify the initial month in which schools qualify for P-EBT by missing or operating at reduced hours for five consecutive days. Once the school is identified as eligible, it will remain eligible for the entire school year. LEAs will provide assurances by month of schools that met the reduced operating status. (Because a relatively small proportion of students began the 2021-2022 school year before September and, few schools in the state will have met the 5-day threshold prior to the start of September, August 2021 is not included in these benefits.)

Month	Number of Schools Identified with Reduced Operating Status	Percent of Schools Identified with Reduced Operating Status
September 2021	1253	88%
October 2021	1261	88%
November 2021	1190	83%
December 2021	1301	91%
January 2022	1223	86%

Due to the complex nature of issuing P-EBT benefits this year by student and by the number of days an individual student is absent, Maryland will use some simplifying assumptions.

Simplifying Assumption 1: Benefits for P-EBT eligible students will be based on a standardized tier aligned to the number of days absent.

Students are eligible for P-EBT benefits if they are eligible for free or reduced-price meals or are enrolled in a CEP school but are unable to receive those meals at school due to the

reduced operating status of their school. Once the reduced operating status is met, students are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19. Students will receive standard tiered benefits for the number of days they are absent from school due to COVID-19.

The COVID-19-related absences include students asked to quarantine or isolate by the school, a health care provider, recommended by the local or state health department due to symptoms or exposure, or any other, COVID related issue aligned to the LEA attendance policy and reopening plan.

Students will receive benefits based on the chart below:

Table 1: Maryland Tiered P-EBT Benefits

Tier	Number of Days Absent	Standard Benefit
Tier A	1 to 5 days	3 days = \$21.30
Tier B	6 to 15 days	10 days = \$71.00
Tier C	16 and more days	18 days = \$127.80

Each LEA will submit to MSDE the required school- and student-level data for all students that were eligible for P-EBT for each month. Each eligible student will receive benefits based on the Tier aligned to the number of days absent by month. (Table 1).

For LEAs that are tracking COVID-related absences, the LEA will provide the actual count of COVID-related absence days per student. For LEAs that cannot track COVID-related absences, any excused absence of 5 consecutive days or more will be presumed COVID-related. The LEA will provide the actual count of the excused absence days for the month and the student will be assigned to the appropriate tier for benefits. For families attending schools using the 5 consecutive day threshold as a proxy for a COVID-related absence, the family may make a claim with the state for any COVID-related absence that is less than 5 consecutive days. The family will attest on a reconsideration form created by the state that the absent days are COVID-related, and the state will verify with the school that the absence was excused before issuing benefits for those days.

Simplifying Assumption 2: Maryland will issue the maximum standard tiered benefits for P-EBT eligible students in Full-Time Virtual Programs.

Maryland is using a simplifying assumption to set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year. Each LEA will submit to the state, the names and addresses of all P-EBT eligible students that were enrolled in the fully virtual program for each month.

PRIVATE SCHOOLS

Surveys and additional collections put in place for non-public private schools will be continued to support P-EBT for SY 2021-2022. Student and school-level information reported will be consistent with the information reported by public LEAs.

To minimize the risk of issuing benefits to children whose absences are not COVID related, the State will review school data submissions and follow-up on any unusual claims that are clearly out of line with known community COVID incidence rates, the P-EBT benefits requested by nearby schools, or data collected through the State's school testing and contact tracing process.

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 childcare facility is closed or is operating with reduced attendance or hours, or
 - the child's childcare 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:

Identifying SNAP Enrolled Children

- The state will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered child care facility.
- The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- The state understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- The state will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year through January 2022 relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, the state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state's lunch claims for the fall semester.
- The state 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

- The state will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using **the following three factors**:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.

2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[180] \div [10 \text{ months}] = [18]$ days per month. This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.
3. The school year 2021-2022 P-EBT benefit per day of \$7.10

Spring semester benefit:

1. The spring semester benefit will be calculated as above but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of spring semester P-EBT child care benefits in November 2022, the state will only have access to spring 2022 CACFP claims data through June 2022 and will use the reduction in claims through that month to calculate the first factor. Maryland will update Table 2 and notify FNS once the June CACFP claims data is available.
2. Before calculating its monthly spring P-EBT benefit, the state 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.

Table 1: Reduction in CACFP lunch claims – fall semester

Fall Semester				Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		
September 2019	446,878	September 2021	302,944	
October 2019	513,021	October 2021	309,616	
November 2019	436,140	November 2021	310,542	
December 2019	414,953	December 2021	289,294	
Total	1,810,992	Total	1,212,396	

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	494,366	January 2022	273,486	
February 2020	470,981	February 2022	317,982	
March 2019	517,931	March 2022	402,104	
April 2019	517,055	April 2022	341,128	
May 2019	554,157	May 2022	346,752	
June 2019	TBD	June 2022	TBD	
Total	2,554,490	Total	1,681,452	

6. Benefit Levels

<p><i>Standard for Benefit Levels</i></p> <ol style="list-style-type: none"> 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:

- 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.
 - Breakfast rates are those received by "severe need" schools.
 - 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:

School Children

Maryland will not provide P-EBT benefits to students enrolled in schools fully in-person and receiving meals through NSLP. Maryland will issue a fixed monthly benefit of \$127.80 for fully virtual students.

This amount was determined by taking the number of scheduled instructional days in the state’s school calendar (180 days) and dividing that by the number of months in the school year (10) multiplied by the daily meal rate (\$7.10).

Table 2 below shows the number of monthly absences by Tier Group.

Table 2

Monthly absence by group	Frequency	Benefit Amount per individual	Total Amount
Tier A: 1-5 absences	211,119	\$21.30	\$4,496,834.70
Tier B: 6-15 absences	42,016	\$71.00	\$2,983,136
Tier C: 16 or more absences (including children in fully virtual programs)	30,054	\$127.80	\$3,840,901.20
Total UNIQUE SASIDs with absences info	283,189		\$11,320,871.90

Each LEA will submit to MSDE the required school and student data of all students that were eligible for P-EBT for each month. Each eligible student will receive benefits based on the Tier aligned to the number of days absent by month.

Child Care Children

Following the CACFP Data Method described in Section 5, the state has calculated P-EBT child care benefits as follows:

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

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit	Full Semester Benefit
Fall Semester	33.1%	18	5	\$ 7.10	\$ 42.24	\$ 211.21
Spring Semester	34.2%	18	5	\$ 7.10	\$ 43.68	\$ 218.39

Spring Semester benefits may change slightly after the June CACFP claims data is available.

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:

- All Maryland's P-EBT recipients, will receive a P-EBT card on which benefits will be loaded. A customer who previously received P-EBT cards but lost it will be able to obtain a replacement card by calling the EBT hotline.
- Maryland maintains a separate D-SNAP eligibility system which is not being used to issue P-EBT benefits.

- Maryland will observe SNAP expungement rules for the P-EBT program. The benefit will be expunged after 275 days from the date of issuance.
- Maryland will maintain its existing process for handling returned cards. Returned P-EBT cards are handled in accordance with the following procedure:
 - Maryland’s EBT processor, Conduent, receives returned cards
 - Conduent statuses the cards in the EBT System (EPPIC)
 - Conduent sends a daily returned card file to the SNAP Administering Agency (DHS). The file contains the first and last name of the recipient, case number, and the date on which the card was returned.
 - DHS matches the returned file against the list of customers who have reached out to DHS to report address changes
 - DHS removes those who have already been issued a replacement card then provides the rest to MSDE
 - MSDE sends the list to Local School Systems to outreach to students/families to obtain updated address
 - Local School Systems provide found updated addresses to MSDE
 - MSDE provides found updated addresses to DHS
 - DHS transmits a demographic file one time per week to update addresses based on the data provided by MSDE or customer contacts
 - A team of EBT managers manually request card replacements in the EPPIC system one day following the demographic data update
 - Impacted customers receive a new EBT card within 7-10 days.
 - Maryland has also adopted a protocol allowing Local Departments of Social Services to issue Over The Counter (OTC) EBT cards for children on as needed basis (i.e. if mail delivery has not been successful).

Maryland will not stagger benefits throughout the issuance month. We believe that staggering benefits will cause confusion and lead to unmanageable call volumes. The State will work closely with the Maryland Retailers Association to ensure that grocers are informed about the P-EBT issuance timelines so that they can anticipate and plan for local demands.

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:

The State of Maryland has a dedicated P-EBT hotline (1-833-330-PEBT or 1-833-330-7328) to provide customers with basic program information. Customers are also able to call

the EBT hotline to PIN their cards, obtain balance information, and request a new card. Maryland will provide a refresher training to call center agents so that they are trained on the new program details.

In addition to the call center, the State will provide customers with an option to submit P-EBT inquiries using an online form which is monitored daily. The online form sends an acknowledgement email so that a customer has a record of his or her inquiry. The form has not only served as an effective communication tool, but also, it provides analytics that the DHS uses to send targeted messages via social media and customer emails addressing recurring questions.

Maryland has also developed a dedicated P-EBT webpage, dhs.maryland.gov/EBT. The page provides ongoing updates and serves as a central resource of information for customers and the public.

Maryland does not require a Social Security Number for one to participate in the P-EBT program, thus it has not been an access barrier. The State uses Homeless Coordinators in each LSS to assist with the delivery of P-EBT cards to homeless students. DHS oversees child welfare programs in addition to administering public benefits. The department uses data from its child welfare administration division to obtain the most current addresses for children in foster care. To address language barriers, all P-EBT communication material including customer notices, flyers, webpages, and emails are translated in Spanish- the language spoken by 95% of Maryland’s Limited English Proficiency (LEP) population. DHS and MSDE collaborate in the development of outreach material.

DHS has a contract with Language Line, a telephonic interpretation company, to provide interpreters as needed. This service is available to Call Center Agents as well as the over 6,300 agency employees. Language Line provides interpretation services in over 70 languages.

Our P-EBT material includes reminders that customers may use their benefits at approved Online SNAP Retailers, an option that supports students with disabilities.

In addition to the P-EBT webpage, flyers, and mass email to over 639,000 contacts in MD DHS’ online consumer portal; Maryland uses meetings with hunger advocates as avenues for public outreach. DHS uses meetings with advocates and SNAP outreach providers to share updates regarding P-EBT.

MSDE leverages existing meetings with LSSs to share P-EBT information and answer questions that school administrators and educators may have. P-EBT outreach material is also shared with local school systems. The table below includes information that will be shared with P-EBT recipients and the public.

Information	Recipients (Non-SNAP & SNAP)	The Public	Delivery Methodology

A description of P-EBT	X	X	P-EBT webpage, P-EBT Notice
Instructions for PINing a P-EBT card	X		Buckslip to be inserted in the P-EBT card mailer, P-EBT notice
Explanation on how benefits cannot be used	X	X	P-EBT website, P-EBT Notice
Explanation of violations and penalties, such as trafficking	X	X	P-EBT website, P-EBT Notice, Email, Social Media
Explanation of violations and penalties, such as trafficking	X	X	P-EBT website, P-EBT Notice, Email, Social Media
An indication that benefits are non-transferable	X	X	P-EBT website, P-EBT Notice, Email, Social Media
Instructions for destroying the card, if they want to decline benefits	X	X	P-EBT website, P-EBT Notice, Email, Social Media
Information regarding how customers may contact the state if they have questions	X	X	P-EBT Notice, Email, Social Media, P-EBT webpage

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: Because many households in Maryland's schools will receive their P-EBT benefits without an application, Maryland will not pursue overpayments that are not fraud-related – this includes benefit received as a result of an error of entities involved in the administration of P-EBT including but not limited to DHS, MSDE, Local School Systems, private schools, and paid contractors.

The State will pursue overpayments only in instances of proven attempts to defraud the program. We will pursue overpayment collection from adults who used benefits not intended for a child in their household (i.e. a non-custodial parent uses benefits intended for his or her child living in a separate household and use of stolen P-EBT card).

The State will contact USDA whenever it identifies an issuance error and will provide a description of the error, the number of children involved, and the value of the over-issuance before the state issues a corrected benefit to a different household and before the state attempts to reclaim benefits from anyone.

Maryland will align its P-EBT overpayment collection to the existing Supplemental Nutrition Assistance Program (SNAP) Claims Management process; however, SNAP benefits will not be reduced as part of the repayment arrangements. P-EBT overpayments will be collected through the department's direct billing. Individuals with overpayments will be referred to Maryland's Department of Budget Management Central Collection Unit (CCU) if they fail to make a repayment arrangement with the SNAP Administering Agency.

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:

Signature
La Sherra Ayala, Executive Director
Family Investment Administration

MD DHS

Signature
Mohammed Choudhury, State Superintendent of Schools
MSDE

Date of Request: _____