

**State Plan for Pandemic EBT: Children in School
School Year 2020-2021**

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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 school children during the school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

State Plan for Pandemic EBT: Children in School
School Year 2020-2021

- **State:** _____ Maryland
- **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act
- **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.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. 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

Response:

The State of Maryland proposes to build on its previously approved plan for August/September P-EBT to issue benefits for the rest of the School Year (SY) 2020-2021. The date range covered by this plan is August 27, 2020 through September 30, 2021. Maryland commits to informing USDA of any significant increase or decrease in these data points during the date range¹ 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 \$67,074,700.

- The estimated amount issued to school children in SNAP households is \$22,465,080
- The estimated amount to school children in Non-SNAP Households is \$33,697,620
- The estimated amount of benefit for children on P-EBT based on the Childcare Eligibility provision: \$109,120,000

The estimated total number of children to which the State will issue P-EBT benefits is 530,000.

- The estimated number of school children in SNAP households is 180,000
- The estimated number of school children in non-SNAP households is 270,000
- The estimated number of children on P-EBT based on the Childcare Eligibility provision: 80,000

The total estimated amount of P-EBT benefits for the remaining SY 2020-2021 for school children is \$617,789,700.

The total estimated amount of P-EBT benefits for the remaining SY 2020-2021 for childcare eligible children is \$109,120,000.

The total estimated amount of P-EBT benefits for all the remaining children for SY 2020-2021 is: \$726,909,700.

The estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment is \$50,883,679, or 7% of the total benefit cost.

The tentative P-EBT issuance schedule is as follows:

- The State will issue retrospective snack benefits for August and September 2020 after the plan approval,
- The State will issue benefits for the months of October, November, December 2020 in a single distribution in May 2021
- The State will issue benefits for the months of January and February 2021 in a single distribution in June 2021,
- The State will issue benefits for the months of March and April 2021 in a single distribution in July 2021
- The State will issue benefits for the months May and June in a single distribution in a single distribution in August 2021,
- The State will issue benefits for the months of July and August 2021 in a single distribution in September 2021

Maryland issued September benefits based on the prior daily benefit rate of \$5.86. Since the rate has increased to \$6.82, the State intends to issue retroactive adjustments to the nearly 440,000 children who have already received September benefits. The State will issue the retroactive underpayments depending on the timing of the State Plan approval.

P-EBT for School Children

Eligible Children

Standard for P-EBT Eligibility

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

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:

certified or determined “other source categorically eligible” for SY 2020-2021, *or* directly

through submission of a household application processed by the child’s school district for SY 2020-2021, *or* certified

Community Eligibility Provision school or a school operating under Provisions 2 or 3, enrolled in a

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certified, determined other source categorically eligible, or certified by application in SY 2019-2020 directly
and the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.

The child does not receive free or reduced-

- Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? 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 SNAP-recipient and non-SNAP-recipient children, and 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).

Response:

The Local School Systems (LSSs) and private schools in Maryland will be the source for identifying P-EBT eligible school children. LSSs and individual private schools are already responsible for conducting eligibility determination for students seeking to enroll in the National School Lunch Program (NSLP). The Maryland State Department of Education (MSDE) will collect information on

eligible students from each LSS and private school. The identification of students will be based on students' eligibility and enrollment in the National School Lunch Program (NSLP) for SY 2020-2021. Therefore, SY 2019-2020 graduates and other non-students in SY 2020-2021 will be excluded.

The LSSs 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 districts during SY 2020-2021.

The LSSs and private schools will follow their processes for new households to apply and enroll children in Free and Reduced-Price School Meals programs. All LSSs will provide and process new NSLP applications for students and for families who may have become newly eligible for free or reduced price meals during SY 2020-2021. Benefits for the newly enrolled children will be retroactive to the beginning of the school year- assuming all other P-EBT eligibility requirements are met.

Maryland will confirm each child's lack of access to meals at school through data that will be collected from LSSs and private schools at least every other month. All students within the same **school** will receive a benefit consistent with the predominant learning model of their school for the given month. The determination of school status as virtual, hybrid or in person will be determined no less than every other month for the remainder of SY 2020-2021.

Maryland will confirm the enrollment of each child in a public or private school. Surveys and additional collections will be developed for non-public private schools. The MSDE collects enrollment and attendance data from each LSSs which includes information on entry and exit dates of students into and out-of public schools. The MSDE will collect from each LSS school and LSS level information on school status at least every other month. LSSs and non-public private schools in Maryland will be the source for identifying and confirming the plan for school schedules.

The following State agencies are involved in the planning and execution of the P-EBT program activities for SY 2020-2021. The roles and responsibilities for each entity are described below:

- MSDE will work with Local School Systems (LSSs) to identify children eligible for P-EBT. The agency will develop a process for collecting the data from Local School Systems and private schools, monitor the operational status of each LSS, and submit the data to the SNAP Administering Agency. The agency 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 LSSs 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.

P-EBT for Children in Childcare

- 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?
- 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 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:

Based on the USDA/FNS interpretation of the childcare eligibility provision of the Consolidated Appropriation and Other Appropriations Act, a child who is not in school is eligible for P-EBT if she or he is:

- Under the age of six
- Is a member of a household receiving SNAP benefits
- Lives in an area the child lives in the area of a school that is closed or operating at reduced capacity/hours, or the child's childcare facility is in the area of such a school.

Maryland understands that the December changes to the P-EBT statute deems all children under age 6 to be enrolled in a covered child care facility for purposes of P-EBT. Maryland has determined that based on this definition, all children under the age of six who are on SNAP currently meet eligibility requirements for P-EBT. Maryland will identify these children using SNAP administrative data. The

data will be analyzed on a monthly basis and the benefits will be issued in accordance with the timeline shown in Figure 2.

The state confirms the following statements:

- MD DHS will identify the LSS of residence for each SNAP-enrolled child under age six,
- For each month from October through the end of the school year, the state will determine whether any school in the LSS has at least one school with a predominantly virtual model in the month,
- If the State identifies at least one such school, all SNAP-enrolled children under age six whose residence is in the area of the LSS will receive a fully virtual P-EBT benefit equal to the appropriate monthly amount
- If the State does not identify at least one fully virtual school in the LSS, but identifies at least one school with a predominantly hybrid model, then all SNAP enrolled children under age six whose residence is in the area of the LSS will receive a partial P-EBT benefit in the same amount as the children in the LSS is predominantly hybrid schools.
- If the local school system is 100% in person no childcare children in that local school system area will receive the PEBT benefit.

There are public health advisories that limit the capacity of childcare facilities in response to COVID-19. A childcare program is required to close and quarantine close contacts if:

1. There is a person (child care staff, child, or other person) with laboratory confirmed or probable COVID-19 who was present in the child care program building within the 2 days prior to developing COVID-19 symptoms or while symptomatic, and had close contact as defined by the CDC, with program staff and/or children
2. There is a person (child care staff, child, or other person) with laboratory confirmed or probable COVID-19 who is asymptomatic, was present in the child care program building within the 2 days prior to the date that they were tested, and had close contact as defined by the CDC, with program staff and/or children
3. There is a person (child care staff, child, or other person) with COVID-19-like illness who was present in the child care program building within the 2 days prior to developing symptoms and does NOT receive a negative RT-PCR test or another specific diagnosis from a health care provider

The State will update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the childcare facility or area schools. The State will rely on the operational status data that local school systems are already required to submit to MSDE. Similarly, MD DHS will obtain childcare closures and reduced capacity data from MSDE.

MD DHS will be responsible for confirming SNAP eligibility while MSDE will confirm the closure or reduced capacity of local schools and/or childcare facilities.

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:

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.

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.).

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.

Response:

The MSDE collects data from Local school systems (LSSs) in regard to the status of their schools and students during the closure of schools. At the end of the first marking term for the state of Maryland, approximately 94% of Maryland students were learning in a 100% virtual learning mode. At the end of the second marking term this rose to 98% due to the increasing cases of COVID-19 in the state. Each Local Board of Education has the authority to approve school schedules and reopening plans. Maryland LSSs will provide to MSDE the predominant learning mode (virtual, hybrid, or in person) for schools in their jurisdiction starting from October 2020. LSSs will also provide to MSDE any schools that may have a different predominant learning mode than reported for the schools in their jurisdiction.

The predominant learning mode for each school will be determined retroactively. The MSDE will collect the school status from LSSs and will compile the information into a State file to provide to DHS. For the months of October through January, schools in several LSSs operated entirely virtually. For those LSSs, reporting school-level learning mode by month will be as simple as confirming that all schools were virtual. In LSSs where some schools operated a hybrid or in-person schedule in one or more of these months, the LSSs will report school-level predominant learning modes by school for each month.

Maryland is utilizing simplifying assumptions to maximize benefits to students, expedite benefit issuances and minimize administrative burden to schools. There are no federal or state requirements for schools to track or report individual student level learning modes (virtual vs hybrid vs in-person). Additionally, Maryland does not have a statewide student information system with student level in-person or virtual attendance data. Therefore, Maryland is proposing school level data be utilized to determine the level of benefits based on the average number of days students are scheduled to attend school.

- The predominant learning model for the school is when the majority $\geq 51\%$ of students are scheduled for a particular mode (virtual, hybrid, in-person).
- The school status determination will be based on the predominant learning model being in place for the majority $\geq 51\%$ of the operating days in the month for each month.
- The “majority” ($\geq 51\%$) model represents what is feasible to calculate.

Many schools in Maryland are using a “phased in” approach to bringing students back to schools. For example, K-1 students may return to school one week, the next week grade 2 may be added, and the following week grades 3-5 return. Additionally, some schools in Maryland are bringing students back to school based on need, with vulnerable populations having priority (Students with Disabilities, English Learners, homeless). The majority model is the simplest and quickest way for LSSs and schools to assess the predominant learning model and report the data to MSDE for P-EBT benefits.

Maryland LSSs will determine a school status for each of their schools based on the average number of days students are scheduled for virtual or in person learning.

The MSDE will also collect a new student level collection of P-EBT eligible children that have chosen to continue in a virtual learning mode as their school reopens. This additional collection will ensure maximum benefits are provided to students.

Each private school will follow the requirements of the public LSSs and provide school status, benefit level of the schools, and student level file of the virtual students.

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.

The state has collected data from the LSSs for the schools in their jurisdiction from the start of the school year. In accordance with FNS requirement, the state will collect retroactive school level data from the LSSs soon after the plan approval to confirm LSS data already collected. The first round of school-level data from the LSSs will cover through March.

The LSSs will report predominant learning models for each school for the remaining months of the school year and will be collected in two collections- at the end of April and middle of June.

● **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 and a lunch for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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-2020-07-22/pdf/2020-15764.pdf>

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

Response: [please use as much space as needed]

No P-EBT benefits will be provided for students enrolled in schools fully in-person and receiving meals through NSLP.

Students in schools with a predominantly virtual schedule in a given month will receive a fully virtual benefit equal to the appropriate month’s value in the rate chart on p. 12 of this plan. Students in schools

with a predominantly hybrid schedule for the month will receive a benefit based on an LSS-determined average number of virtual days for children with hybrid schedules in the LSS in that month.

Maryland will observe the daily meal rate of \$6.82. The table below shows the average number of school days by month, which will be used to calculate P-EBT benefits. Maryland will provide P-EBT benefits to eligible children during summer months, in accordance with the American Rescue Plan Act. The number of school days for the summer months (June, July and August) will be determined later. Benefits for September will be calculated based on SY 2021-2022 reopening schedules which school systems have not yet released.

Below is the Average # of School Days by month for Maryland Public Schools.

Month	# School Days	Benefit Amount for Fully Remote Learners	Benefit Amount for Hybrid Learners
August	0	\$ -	N/A
September	18	\$122.76	
October	22	\$150.04	
November	17	\$115.94	
December	15	\$102.30	
January	19	\$129.58	
February	19	\$129.58	
March	22	\$150.04	TBD
April	19	\$129.58	TBD
May	20	\$136.40	TBD
June	TBD	TBD	TBD
July	TBD	TBD	TBD
August	TBD	TBD	TBD
September	TBD	TBD	TBD

Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 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 2019-2020, 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 2019-2020. 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 2019-2020, 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, including school aged children with an active SNAP case, children under the age of six on SNAP, and Non-SNAP recipients, will receive a P-EBT card on which benefits will be loaded in accordance with the issuance timeline discussed on page 3 of this plan. The State has already instructed individuals who received a P-EBT card last year to keep their cards as the benefits will be uploaded on those cards in order to expedite access. Customers who lost their cards are able to call the EBT hotline to request a replacement card.

Maryland maintains a separate D-SNAP eligibility system which is not being used to issue P-EBT benefits. Benefits issued through the SNAP eligibility system (CARES) are issued under a separate benefit sub-type for tracking purposes.

Maryland will observe SNAP expungement rules for the P-EBT program. The benefit will be expunged after 365 days from the date they were issued.

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 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.

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.

USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.

USDA strongly encourages States to provide relevant program information to actual and potential P- EBT households.

- How will the State resolve dispute 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 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 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 Spring and Summer of 2020, 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. Beginning in the month of November, DHS doubled the number of Call Center Agents in anticipation of increased call volume related to P-EBT and other programs. The State believes that this increase in capacity equips us to address ongoing P-EBT inquiries. Maryland has granted access to the EPPIC system to select Agents who will handle P-EBT calls. The agents have been trained and will receive refresher training on a wide range of customer inquiries including but not limited to benefit amount, eligibility process, perceived case errors, and P-EBT card replacement.

In addition to the call center, the State provides 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 650,000 contacts in 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

Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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.

Response:

Because many households in Maryland's schools will receive their P-EBT benefits without an application, Maryland will not request a repayment of 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).

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.

- **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.

- **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, 2020 through September 30 2021. 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.

- **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.”

- **Civil Rights Statement**

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

- **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

Print Name and Title: La Sherra Ayala, Executive Director, Family Investment Administration

Signature

Print Name and Title: Karen B. Salmon, Ph.D., State Superintendent of Schools

Date of Request: _____