

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

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| <b>Issuing Agency/Office:</b> | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program   |
| <b>Title of Document:</b>     | State Plan for Pandemic EBT: Children in School and Child Care, 2022-2023   |
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| <b>Summary:</b>               | (1) This document is a template to assist states in the development of state plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2). |

*Additional context and background for this document can be found at State Guidance on Coronavirus P-EBT: [Click Here](#)*

*The submission of a P-EBT state plan, associated template, and related reporting obligations are addressed in OMB# 0584-0660, Pandemic Electronic Benefit Transfer (P-EBT), expiration 11/30/2023.*

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

1. **State:** \_\_\_\_\_

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

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

**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

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<sup>1</sup> The date range covered by P-EBT state plan or amendment. A state's plan will typically cover the instructional months in the state's school year (September 2022 through June 2023, for example).

collaboration with the local school districts, is responsible for eligibility determination through the direct certification process, the National School Lunch Program (NSLP) application process and the monitoring and collecting of student learning mode classifications. Further, DESE is responsible for verifying free or reduced-priced eligibility for any homeschooled or virtual student who does not qualify for NSLP direct certification.

This P-EBT plan covers school year 2022-2023 beginning on 8/30/22 and ending on 5/11/23. Payments will be issued on June 25, 2023. As this plan closely mirrors last year's approved plan the below estimates are based on last year's figures.

Estimated monthly<sup>2</sup> 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.
  - i. \$4,923,932 monthly**
  - ii. \$41,853,424 total<sup>3</sup>**
- Estimated amount issued to school children in non-SNAP households
  - i. \$27,545,938 in total**
  - ii. \$3,240,698 monthly**
- f. Estimated total *number* of children to which the state will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
    - i. 338,620**
  - Estimated number of school children in non-SNAP households
    - i. 276,036**

#### **4. P-EBT for School Children (see Q&As #7-25)**

##### **A. Eligible Children**

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<sup>2</sup> Based on the monthly average from SY21-22 total issuances

<sup>3</sup> Calculated by 8.5 months

*Standard for P-EBT Eligibility*

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

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

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.
- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?<sup>4</sup> Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g., which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition,

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<sup>4</sup> 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.

please describe any proposed measures that the state will take to address program integrity when using the proposed simplifying assumptions. *(Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)*

**Response:** [please use as much space as needed]

### **Eligible Enrolled Students**

To identify eligible school children and confirm their eligibility, Massachusetts will use data provided by the school districts. Effective July 1, 2022, DESE has instructed districts to resume regular direct certification and application approval processes used to confirm income eligibility for NSLP or are enrolled in a CEP school or operating under Provision 2 or 3. Students who meet one of these criteria will be considered eligible for P-EBT so long as they meet the COVID absence criteria. Using this list, districts will communicate to DESE the number of eligible absences by eligible student for each month of the school year.

### **Eligible absences**

For the purposes of determining P-EBT eligibility the state will advise school districts 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 policy<sup>5</sup>. Informed by the execution of the SY21-22 P-EBT plan, the state is confident in the school district’s ability to continue to isolate COVID related absences from regular excused absences. The state commits to re-evaluating the definition of COVID related absence should its COVID attendance policies change. Lastly, the state will monitor and follow up with any districts who report disproportionately higher rates of COVID related absences compared to other districts with similar economic and demographic make-up.

### **Virtual and Home-schooled students**

The state intends to create an online SY-22-23 P-EBT application for virtual and home-schooled students on the current P-EBT DTA Connect landing page for eligible families.<sup>6</sup> This application will remain open for a minimum of four weeks and will include fields to collect all information necessary to certify eligibility for free or reduced-price meals, including proof of identity and income eligibility. The state will send a notice to any family identified in its database as attending a non-NSLP virtual academy or is known to be home-schooled regarding the application process and will also conduct a public awareness campaign to notify households.

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<sup>5</sup> Visit <https://www.doe.mass.edu/covid19/on-desktop/protocols/protocols.pdf> for Massachusetts COVID absence policies and protocols

<sup>6</sup> Eligible families have children who are learning virtually or are being homeschooled in a non-NSLP participating setting and have either left public school on January 27, 2020 or later or never entered the public school system (i.e. Kindergarteners, first graders, second graders or out of state transfers) and have elected to home-school due to concerns about COVID .

The application will require all applicants to provide income information in the event the child is ineligible to be directly certified. The online P-EBT application will be modeled after the income reporting section of DESE's existing Supplemental Low-Income Form to collect income information based on household size. This form, adapted from the NSLP household application, uses current NSLP income eligibility guidelines to determine if the applicant meets P-EBT income eligibility standards. Upon submission of the application a household will receive a statement confirming the application has been successfully submitted. The confirmation page will also advise households that they may be required to submit additional verification if they are not determined to be residing in a CEP or Provision 2 district or if their enrollment in SNAP, TANF or eligible categories of Medicaid during the time period between 9/1/22 – 5/11/23 cannot be verified in the state's database. The confirmation page will advise applicants that they will receive notice from the state if any subsequent documentation is necessary to verify their eligibility to receive P-EBT benefits and that verifications can be submitted via mail, fax or in-person at a local Transitional Assistance Office.

Upon submission of an application, the state will create a case in DTA's BEACON eligibility system. For the purposes of determining eligibility for P-EBT a student may be "directly certified" if they were enrolled in SNAP, TANF or eligible categories of Medicaid at any point between 9/1/22 – 5/11/23 or if the school they would have attended participates in CEP or Provision 2. All entries will be matched to check for "direct certification" eligibility through either confirmation the child is or has been enrolled in the programs identified above or if the address provided on the application confirms they would have attended a CEP or Provision 2 school. Applicants whose direct certification eligibility can't be confirmed will receive a notification that their reported income must be verified via document submission within 10 days of when the notice is generated. If the applicant reports an income higher than allowable, the application will be denied. In instances where a child's identity cannot be confirmed through the state's data match systems, documentary evidence will be required to confirm the child's identity prior to certifying them for P-EBT. Households will receive a notice informing them of the documents that are necessary to process their application. Unlike regular SNAP processing rules, the application will remain open until 9/1/23.<sup>7</sup>

### **Proof of Income**

The following documents will be allowable to verify annual household income. Any documents submitted which confirm the household was income eligible at any point between 8/31/22 – 5/11/23.

- ***Jobs:*** Paycheck stub or pay envelope that shows the amount and how often the pay is received; letter from employer stating gross wages and how often you are paid; or, if you work for yourself, business or farming papers, such as ledger or tax books.
- ***Social Security, pensions, or retirement:*** Social Security retirement benefit letter, statement of benefits received, or pension award notice.

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<sup>7</sup> This date allows for the time needed to process the verifications and make the 9/30/23 issuance deadline.

- ***Unemployment, disability, or worker’s compensation:*** Notice of eligibility from state employment security office, check stub, or letter from the worker’s compensation’s office.
- ***Public Assistance:*** Benefits letter from the Massachusetts Department of Transitional Assistance for SNAP or TAFDC, or the Executive Office of Health and Human Services for MassHealth.
- ***Child Support or Alimony:*** Court decree, agreement, or copies of checks received.
- ***Other income (such as rental income):*** Information that shows the amount of income received, how often it is received, and the date received.
- ***No income:*** A brief note explaining how you provide food, clothing, and housing for your household, and when you expect an income.
- ***Military Housing Privatization Initiative:*** Letter or rental contract showing that your housing is part of the Military Privatized Housing Initiative.

### **Proof of Identity**

In instances when an identity can’t be verified in the state’s databases or via historical enrollment records and an SSN is not provided, the household will be required to prove identity through submission of documentary evidence including:

- Birth Certificate
- Hospital Birth Record
- U.S. Passport
- Immigration or Naturalization Documents
- Any other documentation that may be used to verify identity including but not limited to a letter from a collateral contact such as the child’s pediatrician or from a faith-based organization.

### **Enrollment Validation**

All applicants will be required to attest that the reason their child is homeschooled or attending a virtual school is due to concerns related to COVID. Applicants will also select whether the child has ever been enrolled in a Massachusetts school district. For students previously enrolled in a qualifying school district the application will request the date of departure. DESE will verify, through data matching, if the child was enrolled in a MA public school district and has withdrawn since 1/27/20. Students who were never enrolled in a Massachusetts school district due to age or prior residence in another state will be required to self-attest to the date they began schooling in the qualifying district.

### **Certification Statement**

Example: “I certify (promise) that all information on this application is true and correct and that all income is reported. I also certify that the reason my child is being homeschooled or is attending a fully virtual school is due to concerns about COVID. I understand that this information is given in connection with the receipt of Federal funds. I understand that the state may verify (check) the accuracy of information in this application. If my child’s homeschooled

or virtual school status changes during the school year, and my child enrolls in an in-person school, I will notify the state immediately. I am aware that if I purposely give false information or fail to promptly notify the state of my child’s enrollment in an in-person school, my child may be denied benefits, and I may be prosecuted under applicable state and federal criminal laws.”

## Quality Control

To determine the error rate, DESE will use documentation provided to manually verify the income eligibility of the first 100 applicants. If the error rate for this first 100 is at or below 5 percent, DESE will review and verify the documentation for 10 percent of remaining applications. If at any time, the error rate rises above 5 percent, DESE will resume verifying the documentation for all applicants.

## B. School Status

### *Standard for P-EBT Eligible School Status*

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

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

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



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

**Response:** [please use as much space as needed]

All Massachusetts schools have resumed 100% in-person learning yet students continue to miss school due to COVID related absences. As such, COVID related absences confirm a school is operating at reduced attendance due to COVID and therefore meets the statutory requirement of operating with reduced hours or attendance for five or more consecutive days.

## 5. P-EBT for Children in Child Care (see Q&As #26-33)

### *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.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.

- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44<sup>8</sup>. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

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

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

- How will the state determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #30)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine those children’s eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
  - the child’s child care facility is closed or is operating with reduced attendance or hours, or
  - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the state will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

**Response:** [please use as much space as needed]

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<sup>8</sup> The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

Please see the state’s approved child care plan for SY22-23.

**6. Benefit Levels**

*Standard for Benefit Levels*

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

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

**Notes:**

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

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

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

**Response:** [please use as much space as needed]

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 approach proposed in FNS’ guidance. For the month’s of September – April students will be eligible for one of three payments outlined below.

Due to the expiration of the PHE on May 11, 2023 students will be eligible for only two payment amounts for the month of May.

| Absence Range | Total Amount of P-EBT | Actual Number of Days Paid |
|---------------|-----------------------|----------------------------|
| 1-5           | \$25                  | 3                          |
| 6-9           | \$65                  | 8                          |

| Absence Range | Total Amount of P-EBT | Actual Number of Days Paid |
|---------------|-----------------------|----------------------------|
| 1 – 5         | \$25                  | 3                          |
| 6 – 15        | \$82                  | 10                         |
| 16+           | \$147                 | 18                         |

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

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

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using

specific dates, describe important milestones and realistic durations between them. USDA suggests that states build their timelines from the date USDA approves the state's plan (Day #0).

- The timeline must include the state's tentative issuance dates. In past years, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to SNAP state agency (Day #5)
  - P-EBT hotline becomes active (Day #9)
  - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

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

**Response:** [please use as much space as needed]

Massachusetts intends to issue P-EBT benefits on a retroactive basis. The state will issue one lump sum payment on June 25, 2023 covering eligible days accrued from September 1, 2022 – May 11, 2023. Massachusetts issues SNAP benefits on a cyclical schedule; issuing on the 25<sup>th</sup> 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 274 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 questions from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

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

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

USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:

- A description of P-EBT
  - Instructions for PINing a P-EBT card
  - Explanation of where benefits can be used
  - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
  - Explanation of violations and penalties, such as trafficking
  - An indication that benefits are non-transferable
  - Instructions for destroying the card, if they want to decline benefits
  - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
- Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

**Response:** [please use as much space as needed]

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](http://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](http://Mass.gov/p-ebt) and [MAp-ebt.org](http://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](http://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](http://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

*To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.*

states should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. states cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, states should develop P-EBT-specific rules and procedures and include those in their state plans. states must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the state's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a state's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. states that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the state may attempt to recover benefits or reduce a future issuance. Under no circumstances may the state reduce a SNAP benefit to settle a P-EBT claim.

Finally, the states recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold state agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your state will manage P-EBT payment errors.

**Response:** [please use as much space as needed]

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 FNS NERO whenever issuance errors have been reported, identify the cause and take steps to ensure the issue does not occur again. Further, Massachusetts will utilize the spreadsheet provided by FNS to communicate a description of the error, the number of children involved, the steps taken to prevent the issue recurring, 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, 2022 through September 30 2023. As the authorized grantee, the SNAP state agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP state agency, the SNAP state agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP state agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP state agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP state agency's letter-of-credit until this plan is submitted and approved. The SNAP state agency's Budget Plan should include the estimated administrative costs for all state agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

#### **12. Release of Information**

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

#### **13. Civil Rights Statement**

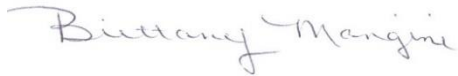
The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation),

disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

**14. Administration of State P-EBT Plan**

The state will administer P-EBT according to the terms of its approved state plan. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

**Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:**



\_\_\_\_\_  
Signature

Brittany Mangini, Associate Commissioner for Food Security and Nutrition Programs  
Massachusetts Department of Transitional Assistance



\_\_\_\_\_  
Signature

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

**Date of Request: March 28, 2023**