

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School 2021-2022
Document ID:	
Z-RIN:	
Date of Issuance:	August 26, 2021
Replaces:	N/A
Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

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

1. **State:** North Carolina

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

3. **Executive Summary:**

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

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care (addressed in 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
 - Estimated amount issued to non-school children in child care (addressed in amendment)
- 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 (addressed in amendment)
- 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 (addressed in amendment)

Response:

North Carolina (NC) proposes to build off its previously approved P-EBT plan for SY 2020-2021, inclusive of the summer period. The date range for the current plan will be from September 1, 2021 through May 31, 2022 in anticipation of a potential SY 2021-2022 P-EBT summer period.

¹ The date range covered by P-EBT State plan or amendment. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

Most NC public schools have returned to in-person instruction however, they are fluidly responding to COVID-19 outbreaks through quarantines and temporary closures with virtual instruction and/or reduced attendance in hybrid schedules as necessitated by infection rates and quarantines. Because of this uncertain landscape, the estimates presented here will be monitored and NC will inform USDA of any significant increase or decrease in these data points during the period covered by this initial plan.

North Carolina reviewed actual data on school closures, virtual instruction and COVID-19 related absences in the 2021-22 school year to develop P-EBT estimates with increased confidence. The resulting estimates of P-EBT issuance during the date range coverage period are as follows:

- Estimated monthly amount issued to school children is \$17,040,000 assuming eligible students impacted by quarantine/closure monthly is 20,000 averaging 15 days of benefits each month and eligible students in allowable fully virtual learning is 100,000 with 21 days of benefits each month
 - Estimated monthly amount issued to school children in SNAP households (35% of \$17,040,000) is \$5,964,000
 - Estimated monthly amount issued to school children in non-SNAP households (65% of \$ 17,040,000) is \$11,076,000
- Total issuance of \$153,360,000 (total monthly estimate of \$17,040,000 multiplied by 9 months in the 2021-2022 school year)
 - Estimated total amount issued to school children in SNAP households is \$53,676,000
 - Estimated total amount issued to school children in non-SNAP households is \$99,684,000
- The estimated total *number* of school children to which the State will issue P-EBT benefits is approximately 248,000 (distinct annual student count) assuming the number of virtual students will remain the same throughout the school year and that in each month 80% of the students affected by quarantine or school closure will be receiving benefits for the first time in the 2021-2022 school year and 20% will have received benefits in at least one month previously in the 2021-2022 school year
 - Estimated number of school children in SNAP households (35% of total) is 86,800.
 - Estimated number of school children in non-SNAP households (65% of total) is 161,200.

The tentative monthly P-EBT issuance schedule is outlined in Section 7, Implementation Timeline, EBT Processing, and Benefit Issuance.

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

A. Eligible Children

Standard for P-EBT Eligibility

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

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

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals²? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

² The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

Response: [please use as much space as needed]

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

- The North Carolina Department of Health and Human Services (NC DHHS) is responsible for the planning, coordination, policy development, and monitoring of the P-EBT program as well as NC Food and Nutrition Services SNAP and Child and Adult Care Food Program (CACFP) data. NC DHHS is also responsible for development of primary communications regarding P-EBT (i.e. website, partner toolkits, social media).
- The North Carolina Families Accessing Services through Technology (NC FAST) 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 North Carolina Department of Public Instruction (NC DPI), including but not limited to the School Nutrition, Data, Research and Federal Reporting, Accountability, Federal Programs, Charter Schools, Communications and other Divisions, collaborates with local Public School Units (PSU) to address pandemic-related initiatives for students. The department is responsible for student eligibility determinations and the reporting of student enrollment, and attendance data, coordination of P-EBT initiatives with vulnerable student populations, communications with education leaders and stakeholders and other outcomes as needed to support overall program integrity, equity and inclusion.
- Cherokee Central Schools (CCS) is responsible for eligibility determinations for free or reduced meal benefits for students that attend CCS, the National School Lunch Program (NSLP) application process, and the monitoring and collecting of student, enrollment, and attendance data.

NC DHHS will work with its EBT processor, all relevant State agencies, and other stakeholders, to ensure a successful P-EBT program, timely implemented, with realistic expectations.

To identify eligible school children and confirm their eligibility, NC will use data provided by the PSUs and non-PSUs directly. North Carolina will not apply prior year free or reduced-price meal eligibility to the 2021-22 school year. Schools collected school meals applications from all interested households at the beginning of the current school year in order to reset all children's eligibility for free and reduced-price school meals. NC DPI will instruct PSUs and non-PSUs to provide them with a list of all students eligible for free or reduced-price meal benefits by way of application, direct certification (SNAP recipients), and other new categorically eligible students. This list will contain the minimum necessary data elements to issue benefits in accordance with USDA guidance and the processes described in this plan. NC DPI will also instruct the PSUs and non-PSUs to remove data for students who have graduated or moved out of the district from this list and to update current school and household information.

Cherokee Central Schools will provide a list directly to NC FAST of all students eligible for free or reduced-price meal benefits. This list will contain the minimum necessary data elements to issue benefits in accordance with USDA guidance and the processes described in this plan. CCS will remove students who have graduated or moved out of the district from this list, update current school and household data, and include students newly eligible by way of direct certification (SNAP recipients), other new categorically eligible students, and SY 2021-2022 approved household applications (non-SNAP recipients).

A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm their eligibility for P-EBT benefits.

For the purposes of P-EBT, public schools, charter schools and non-public school units who administer the NSLP will be instructed to record individual student's attendance using virtual instruction and quarantine codes and provide that information to NC DPI. These codes will confirm a student's eligibility for free or reduced-price meal benefits at school and the P-EBT benefit level. Students receiving virtual instruction or who are absent due to COVID-19 conditions will be eligible for benefits for the days in which they were in virtual instruction, absent and/or quarantined (including COVID-19 related symptoms or illness).

North Carolina schools use a common Student Attendance and Student Accountability Handbook (Handbook) which provides school administration and personnel (including teachers) information regarding the application of attendance policy and recording of attendance in the student information system (PowerSchools). The quarantine and virtual instruction codes which will be utilized for P-EBT are included in the Handbook. North Carolina recognizes the ongoing need for districts to be able to respond to local COVID-19 conditions. School Superintendents and local School Boards of Education have the authority to make decisions that are best for their students. Though the Handbook provides a measure of consistency across school districts, local control will govern the details which are developed or adjusted based on need in response to COVID-19 conditions through structured processes within the school districts and control measure requirements have been adopted. To specifically address the ongoing impact of COVID-19 on student attendance, the State Board of Education agreed to update the Handbook to provide additional guidance on COVID-related absences and to clarify what can be documented under quarantine. This change updates the definition and use of "quarantine" in the Handbook to be "when isolation of the student is ordered by the local health officer or by the State Board of Health or when isolation or quarantine of the student is a required state or local control measure", thereby schools may use the quarantine code for both school enforced quarantines as well as parent-initiated isolation of students due to COVID-19 illness or symptoms. Further guidance has been provided to North Carolina school districts through a memo titled Lawful Student Absence Pursuant to Required Control Measures which states "schools are required to comply with control measures, including excluding students from school who meet the criteria to isolate or quarantine. A formal isolation or quarantine order does not have to be issued". Control measures are outlined in the StrongSchoolsNC: Public Health Toolkit (K-12). This memo was sent immediately School Superintendents and all public school unit officials for immediate adoption and action. To be clear, COVID-related absences considered for P-EBT do not extend to circumstances that may impact a student's ability to attend school but which are not directly related to COVID-19, such as staffing shortages in the schools or bus system. This condition, however, would not apply to situations where a COVID-related staff quarantine of School Nutrition personnel would prevent meal service for students; in this situation, eligible students could receive P-EBT benefits based on their attendance record as described elsewhere in this state plan.

North Carolina will monitor for outliers in COVID-related absences as the data is received and processed each month. If any large discrepancies are detected, NC will reach out to the location

to inquire and verify that the data recorded and submitted are in accord with the Student Attendance and Student Accountability Handbook and local school district guidance.

The State recognizes that students enrolled in full virtual academies that are ineligible to participate in the NSLP are not eligible for P-EBT and therefore will not be included. Student attendance records will be reported on a monthly basis and will determine student eligibility and benefit amount each month. If the student is no longer eligible or withdraws from school during the month, benefits will be based on the period of time the child was eligible for that month. NC DPI will request the PSUs and non-PSUs to provide student, enrollment and attendance records no later than the 10th of the following month and will provide this data to NC DHHS for issuing benefits. Benefits will be issued monthly retrospectively on or about the 25th of each month following implementation through June 2022 (benefit months September 2021-May 2022).

B. School Status

Standard for P-EBT Eligible School Status

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

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

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response: [please use as much space as needed]

North Carolina will identify, confirm, and monitor the status of individual schools and students through monthly reporting from PSUs and non-PSUs to NC DPI. The State will use student attendance records from the 2021-22 school year to confirm schools have met the 5 consecutive days of school closure or reduced attendance/hours. NC DPI will provide guidance to each district on how to classify and report a student's attendance. PSUs and non-PSUs operating fully in-person will have eligible students if the student meets the requirements in section 4.A., Eligible Students.

North Carolina schools will be asked to use specific codes when documenting student attendance, including a code for virtual instruction and a code for quarantine or COVID-related absence which will be used to determine P-EBT eligibility and benefit amount. Students will be eligible for P-EBT benefits if their attendance record contains evidence of days in quarantine and/or virtual instruction. A school will be considered to have met the 5 consecutive day requirement by way of reduced attendance if one or more students are in quarantine and/or virtual instruction for 5 or more consecutive days as reflected in their attendance record. Schools will submit this information via a data file to NC DPI monthly.

North Carolina will also identify, confirm, and monitor the status of individual schools and students through monthly reporting from CCS.

5. P-EBT for Children in Child Care (see Q&As #25-33)

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or

- the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

This section will be addressed in an amendment to the state plan.

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

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

Response: [please use as much space as needed]

North Carolina is using its experience in administering P-EBT during the 2020-2021 school year to better inform its 2021-2022 benefit issuance strategy. Additionally, PSUs and their local Board of Education are making decisions about instructional environments and the need for quarantining students, teachers and faculty on a daily/weekly basis based upon the changing COVID-19 metrics at the State, local and school level. This year continued flexibility is essential to support student, staff and community health while minimizing community spread of the virus.

To account for the fluid nature of the pandemic and that a student’s school attendance, virtual instruction or quarantine status may change throughout the month, the State will be issuing benefits monthly retrospectively for the previous month. Students will receive P-EBT benefits equal to the daily rate times the number of days in virtual instruction and/or quarantine reflected in their school attendance record (inclusive of students who are absent from an in-person learning model due to COVID-19 symptoms or illness and the need to quarantine). NC schools will also provide changes in each student’s attendance record so that corrected benefits can be issued if needed.

Additionally, it is the State’s goal to issue P-EBT benefits to children who were excluded or under issued benefits in the P-EBT issuances during the prior iterations of the P-EBT program. In these instances, NC acknowledges the need to email SERO explaining the nature of the error, the number of children affected, and the amount before making the corrections.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Key milestones within the tentative timeline for implementing the 2021-2022 P-EBT program are listed below. The issuance schedule may change from that described below depending on when the State Plan is approved and when system updates are ready for deployment.

The tentative timeline for initial implementation in SY 2021-2022 is as follows:

Day 0 – Plan approval is received

Day 1 – Inform PSUs, non-PSUs, CCS of the reporting criteria and submission instructions (Discussions and information on anticipated approach and expectations will occur in advance)

Day 3 – Finalize system requirements to update P-EBT system in accordance with SY 2021-2022 approved State Plan approach

Day 8 – Initiate P-EBT system updates (planning, scheduling, coding)

Day 40* – Deadline for PSUs, non-PSUs, and CCS to submit student files for September, October and November records

Day 47* – File transfers from NC DPI to NC DHHS

Day 67* – System readiness complete (coding, testing, promotion)

Day 67* – Public awareness campaign commences

Day 71* – File transfers to EBT processor FIS and customer notice production begins

Day 71-75* – Benefits for September, October and November are deposited for both non-SNAP and SNAP households, staggering the issuance over several days

*Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

North Carolina intends to issue P-EBT benefits for September 2021-May 2022 retrospectively on a monthly basis beginning in January 2022. The feasibility of a January 2022 implementation (September-December benefits) is dependent on State Plan approval and stakeholder and system readiness. If a January issuance cannot be achieved, NC plans to implement SY 2021-2022 (September-January) issuances in February 2022. NC will update USDA if there are significant changes to the approved issuance schedule. NC will stagger the issuances over several days in anticipation of fewer recipients each month, other food assistance benefit issuances, lessons learned from the 2020-2021 P-EBT program, and consultation with stakeholders.

The typical monthly timeline for issuances is as follows:

Day 1 – Start of month

Day 10* – Deadline for PSUs, non-PSUs, and CCS to submit student files

Day 15* – File transfers from NC DPI to NC DHHS

Day 25* – File transfers to EBT processor FIS and customer notice production begins

Day 25* – Social media post informing on issuance

Day 25-30* – Benefits are deposited for both non-SNAP and SNAP households, staggering the issuance over several days

*Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

Each month, by the 10th day of the month, all eligible PSUs, non-PSUs and CCS will provide the State with the necessary data to issue P-EBT. This data includes a list of students eligible for free and reduced-price meals and their respective student, enrollment, and attendance data. CCS will provide the data directly to NC FAST. The PSUs and non-PSUs will provide the data to NC DPI. NC DPI will collate the data and transfer the resulting files to NC FAST on or around the 15th day of each month. This allows for the necessary data clean up and file transfer to the state's EBT processor, FIS. The goal is to issue the P-EBT benefits by the 25th day of each month following an eligible month (15 days after receiving the data from the PSUs and non-PSUs). NC will notify USDA if the issuance in any month will be delayed beyond the month of expected issuance.

The State intends to follow the same distribution model utilized in the 2020-2021 P-EBT. North Carolina Food and Nutrition Services (NCFNS) households will receive their P-EBT benefits on their EBT card while non-NCFNS households will receive benefits on a unique P-EBT card. New P-EBT cards will not automatically be issued to households who have already been previously issued a P-EBT card. Newly eligible households will be mailed benefit cards to their household address and newly eligible CCS students will receive P-EBT cards mailed to CCS where they will be distributed to parents/caretakers centrally. For families whose card has been lost or damaged, NC DHHS has developed an online replacement card portal and NC DHHS is also accepting replacement card requests via its call center assistance line. Undeliverable cards will be returned to the EBT processor, FIS, who will in-turn provide the state with information on undeliverable cards. This information will be shared with PSUs for outreach purposes as needed.

P-EBT benefits will follow the same expungement rules that the state follows for SNAP. 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. The state recognizes

FNS' recommendation that P-EBT be listed first in the draw/spend hierarchy and will work with EBT processor, FIS, to assess the feasibility of making that change.

8. Customer Service

Recommended Standard for Household Support

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

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

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits

- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

NC DHHS 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.

NC DHHS' EBT Call Center will continue to serve as front line customer support. To aid field staff in assisting callers, staff has access to EBTedge to allow field staff to specifically investigate a child's P-EBT eligibility, benefit amount and card issuance status. NC DPI also stood up and staffed a P-EBT phone line to assist callers with concerns specific to school data. In Spring 2020, NC stood up an independent P-EBT website (www.ncdhhs.gov/pebt) which provides information on the State's P-EBT program and answers to frequently asked questions and continues to be maintained and updated to provide the most current information. NC DHHS is exploring the option of adding a chat bot to the website to provide an additional option for customer support. Additionally, a specific email/inbox exists internally at NC DHHS where counties and state field staff may forward issues when they cannot easily be resolved. A dedicated staff member will monitor this inbox and forward the emails to the appropriate staff to problem solve issues utilizing the records provided by the PSU. In instances where NC DHHS is unable to locate a child in their records, the family will be referred to their respective PSU where issues of eligibility can be more easily determined.

The state is committed to serving all eligible children regardless of primary language. The P-EBT website (www.ncdhhs.gov/pebt) is translated into multiple languages upon selection from 23 language options. Furthermore, all outreach materials have been translated into Spanish as required. These materials will be shared with PSUs, partners and other community organizations to distribute to families.

The Federal Programs Division of NC DPI will collaborate with other divisions within the department and NC DHHS to educate and distribute P-EBT cards for students who are experiencing homelessness, including unaccompanied homeless youth, students in foster care, and students who have been identified as migrant and other students who may need the assistance of a school social worker to help ensure access to P-EBT benefits if and when this additional distribution method is warranted. If needed, a program specialist will be assigned

to coordinate the access and the distribution of P-EBT cards to the appointed homeless liaison in each PSU and training, technical assistance, communication tools, documentation templates, summary reports, and an action plan for supporting vulnerable populations will be completed. Collaboration with the NC DHHS and NC DPI's Child Nutrition and Federal Monitoring and Support Division will occur regularly to ensure resources are allocated appropriately and in a manner that supports program integrity.

Public Awareness Campaign: The state will conduct a public information campaign through use of websites www.ncdhhs.gov and www.covid19.ncdhhs.gov and social media platforms. North Carolina intends to issue a press release in English and Spanish to target state-wide and local news organizations and Senior Leadership to announce at a press conference. Similar to the 2020-2021 school year, the State will create communication toolkits and will work with schools and community organizations to push out P-EBT materials in required languages (sample website copy, sample social media posts and graphics, flyers, etc.). These outreach materials will be shared with schools, community organizations, partner agencies and other stakeholders.

Direct Communication: All eligible P-EBT children, upon the first month of SY 2021-2022 P-EBT eligibility, will receive a notice similar to what was sent in the 2020-2021 school year. The notice will include an explanation of P-EBT generally, eligibility 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 will be available in English and Spanish and will direct clients to www.ncdhhs.gov/pebt or NC DHHS' EBT call center for further information or assistance. Notices containing the same information as the one mailed out to SNAP/non-SNAP recipients will be provided to CCS to hand out as part of the P-EBT card distribution process.

The EBT processor, FIS, tracks P-EBT card pinned rates by city and town. The State can use that data as needed to partner with PSUs that have high rates of unpinned cards which may indicate that families are having trouble accessing their benefits.

9. Over-issuance of P-EBT benefits

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

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider

reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

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

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

Response: [please use as much space as needed]

With regards to P-EBT over-issuances, NC DHHS will model its approach after the established NCFNS SNAP claims management plan. The state will generate a monthly report to identify all potential over-issued P-EBT benefits. These cases will be tracked in the NC FAST eligibility system and will be coded as administrative error claims, unless proven to be due to household error or misrepresentation, to avoid reduction of NCFNS SNAP benefits as part of the repayment arrangement. NC has considered the fact that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data and that reclaiming benefits under those circumstances would likely burden affected households. NC has also considered the likelihood of recovery with respect to the costs and administrative burden for recovery. With these considerations, and that NC DHHS believes it does not have the authority to pursue claims against households or children that were incorrectly issued benefits to which they were not entitled, NC will not pursue claims against recipients of P-EBT benefits. When NC DHHS discovers instances where a child's benefits went to the wrong household or child, NC DHHS will research those cases individually and issue benefits only when the state confirms that its original issuance was made in error. NC DHHS will not issue duplicate benefits in cases of disputed guardianship if the state believes the original issuance was correct.

10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30, 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will

be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

12. Release of Information

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

13. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

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

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

Susan G. Osborne

Signature

Susan G. Osborne, Assistant Secretary for County Operations
North Carolina Department of Health and Human Services

Lynn Harvey

Signature

Lynn Harvey, Director, School Nutrition and District Operations Divisions
North Carolina Department of Public Instruction

Date of Request: 09/30/2021, Revised 11/10/2021