

**State Plan for Pandemic EBT: Children in School
and Child Care, 2020-2021**

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

**State Plan for Pandemic EBT: Children in School
and Child Care 2020-2021**

1. **State:** North Carolina

2. **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act

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).

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- 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. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Response:

North Carolina proposes to build off its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from October 1, 2020 through June 30, 2021.¹ The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

North Carolina will issue child care P-EBT benefits for the date range of October 1, 2020 to June 30, 2021.

The upper-bound estimates of P-EBT issuance during the date range coverage period are as follows:²

- Monthly issuances of \$90,510,150 (total number of students from spring 2020 (899,748) assuming 75% fully remote ($\$6.82 * 17$ days per month), 20% hybrid ($\$69.82 * 10$ days per month) and 5% in-person ($\$0$ per month)
 - Estimated monthly amount issued to school children in SNAP households (35% of \$90,510,150) is \$31,678,553
 - Estimated monthly amount issued to school children in non-SNAP households (65% of \$90,510,150) is \$58,831,598
- Estimated monthly amount issued to non-school children in the child care group is \$19,867,172
- Total issuance of \$814,591,350 (monthly estimate multiplied by the nine months remaining in the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$285,106,977
 - Estimated total amount issued to school children in non-SNAP households is \$529,484,382
- Estimated total amount issued to children in the child care group is \$178,804,544
- The estimated total *number* of children to which the State will issue P-EBT benefits (based on spring 2020 figures) is approximately 899,748.
 - Estimated number of school children in SNAP households is 314,912.
 - Estimated number of school children in non-SNAP households is 584,836.
- Estimated number of non-school children in child care is 194,205.
- The estimated total amount of administrative funds the State needs to complete the work described in this plan is \$3,372,000⁵.

North Carolina will issue the \$0.96 snack reimbursement, retroactively to students that received an August/September benefit as part of the August/September amendment. The aggregate value of this adjustment is \$17,917,002. North Carolina will issue adjustments in February with the initial P-EBT benefit issuances. The adjustment for students that already received August and September will receive a supplement in the month of February for the retro benefits. All others will include the snack benefit in their initial issuance and will not require a supplement. The new total estimated annual benefit is \$857,893,666. This assumes a monthly benefit of $\$87,932,912 * 11$ months, minus the \$109,368,365 already issued for August and September.

1 Estimates provided in this plan amendment are not applicable to August or September 2021 as these months are part of a separate school year and data to inform estimates for those months is not yet available. The state will notify FNS should we proceed with P-EBT for SY21-22 and provide the associated estimates

2 Estimates are subject to change as student/school learning modes fluctuate

3 The state anticipates these numbers to ultimately be lower as many public-school units are operating in a hybrid status

4 The state's proposed monthly benefit allotment for schools operating in a fully remote status

5 These estimates cover the anticipated administrative costs from October 2020 – June 2021.

4. P-EBT for School Children

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 2020-2021, *or*
 - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

Response: [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.

- 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 (DPI), including but not limited to the School Nutrition, Data, Research and Federal Reporting, Accountability, Federal Programs, Charter Schools, Communications and other Divisions, collaborate 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 learning mode classifications, 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 is responsible for eligibility determination for free or reduced Meals for students that attend Cherokee Central Schools (CCS), the NSLP application process, and the monitoring and collecting of student learning mode classifications.

To identify eligible school children and confirm their eligibility, North Carolina (NC) will use data provided by the PSUs and non-PSUs directly. DPI will instruct PSUs and non-PSUs to provide them with a list of all students eligible for free or reduced-price meals. This list will contain the minimum necessary data elements to issue benefits in accordance with USDA guidance and the processes described in this plan. This list will be developed using the SY19-20 list of free and reduced-price eligible students as its base. DPI will also instruct the PSUs to remove students who have graduated or moved out of district from this list, update current school and address data, and add students newly eligible by way of direct certification (SNAP recipients), other new categorically eligible students. The SY20-21 National School Lunch Program (NSLP) data will be used to capture newly approved household applications that did not receive in the SY19-20 (non-SNAP recipients).

Cherokee Central Schools will provide a list of all students eligible for free or reduced-price meals. This list will contain the minimum necessary data elements to issue benefits in accordance with USDA guidance and the processes described in this plan. This list will be developed using the SY19-20 list of free and reduced-price eligible students as its base. CCS will remove students who have graduated or moved out of district from this list, update current school and address data, and add students newly eligible by way of direct certification (SNAP recipients), other new categorically eligible students, and SY20-21 National School Lunch Program (NSLP) 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. Public and non-public schools will track a students' learning mode (i.e. Remote, Hybrid or In-person) and report to the state on a monthly basis.

Learning modes are defined as:

- In-Person Learning mode = The student is attending school in-person 100% of the time.
- Remote Learning mode = The student is attending school in a 100% virtual learning mode.

- Hybrid Learning mode = The student is attending school any combination of in-person and virtually.

For the purposes of P-EBT, charter schools and non-public school units who administer NSLP will be required to track a student's learning mode and provide that information to DPI. A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. The state intends to leverage simplifying assumptions to issue two benefit amounts, one amount for students in hybrid learning mode and one amount for students in remote learning mode (more details are provided in the Benefit Level section).

Initial P-EBT multi-month issuance:

The initial P-EBT multi-month issuance will be staggered over several issuance days. Benefits will be issued for the months of August through December in one distribution in February. Benefits for January and February will be issued in one distribution in March. These issuances will be staggered throughout February and March. Students who are receiving the snack supplement for August and September 2020 will receive that payment in February. A student will be eligible for the initial multi-month issuance of August, September, October, November, December, and January if they meet one of the following conditions:

1. The student is not included in the 2020-2021 FRP or CEP files and has not been determined ineligible for the 2020-2021 school year but received FRP last year and is still enrolled at a NSLP school – therefore they will receive P-EBT if their school is virtual or hybrid or the student calendar shows virtual or hybrid.
2. The student is included in the 2020-2021 FRP or CEP files with a start date of 10/1/2020, has not been determined ineligible for the 2020-2021 school year, and was included in the Spring P-EBT issuance. The student will be considered to have carryover eligibility for the months of August and September ongoing.
3. The student is included in the 2020-2021 FRP or CEP files with a start date of 8/1/2020 or later, has not been determined ineligible for the 2020-2021 school year, and was not included in the Spring P-EBT issuance. The student will be considered eligible for the months of August ongoing unless later found ineligible for FRP or CEP.

Ongoing P-EBT issuance:

After initial multi-month issuance to provide P-EBT benefits for prior months, the state plans to issue P-EBT retroactively in one-month increments. Benefits will be based on the higher of the school's or the child's learning mode, student status, and number of days in virtual learning in the prior month. If the child 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. DPI will request the PSUs to provide any updates to a child's learning mode no later than the 10th of the following month. New students that become eligible for FRP will start receiving P-EBT retroactively to August 2020.

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.

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 to DPI. DPI will provide guidance to each district on how to classify and report a student's learning mode. The majority of PSUs that were confirmed P-EBT eligible through the approval of our September 2020 P-EBT plan have still not resumed fully in-person instruction. PSUs operating fully in-person will have eligible students if the student meets the requirements in section 4. A. Eligible students. The Benefits for those students will be based on the criteria listed in section 5. The state will use the School status from the power school calendar day table (school calendar) provided by DPI to search for and confirm the 5 consecutive days of school closure or reduced attendance/hours.

North Carolina schools track the learning mode for each student (remote, in-person or hybrid) and attendance records. All Students in a remote or hybrid learning mode (inclusive of the in-person exceptions listed above) will be eligible for P-EBT if they meet the minimum criteria

and are in a virtual learning mode. Schools will submit this information via a data file to DPI. North Carolina schools also track any changes in each student's instruction mode so that DPI will receive up-to-date information in the monthly data files.

North Carolina will identify, confirm, and monitor the status of individual schools and students through monthly reporting from the Cherokee Central Schools using the same process as listed above for DPI.

Please see the state's intended use of simplified assumptions outlined below in the "Benefit Levels" section

5. P-EBT for Children in Child Care

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 received SNAP benefits at any time since October 1, 2020.
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?
- For children whose residence is not in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

- Per the guidance, North Carolina will assume all children under the age of 6 (as of October 1, 2020) to be enrolled in a covered childcare facility.
- North Carolina will identify all children less than 6 years of age (as of October 1, 2020) that are part of a household that received North Carolina Food and Nutrition Services (NCFNS) benefits any time since October 1, 2020.
- If a household with a child under 6 years of age begins to receive NCFNS benefits the State will issue P-EBT benefits retroactively back to October 2020 at the initial issuance. Ongoing benefits will be provided beginning with the first month of FNS eligibility.
- If an active NCFNS household adds a newborn to their household, P-EBT benefits for child care will be provided retroactively back to month of birth.
- If the child turns 6 years old while being served and is not picked up in student P-EBT records, the State will continue to provide benefits to them through July 31, 2021.
- If a child is removed from the NCFNS household or if the NCFNS case closes, child care P-EBT benefits will terminate with the last month of NCFNS eligibility.
- North Carolina will exclude children who are already receiving P-EBT benefits for children in school to prevent over issuance by matching First Name, Last Name, and Date of Birth.
- North Carolina will use data from the NC FAST eligibility system along with school data from DPI to determine child care P-EBT eligibility and benefit level. All data matches will be run on a monthly basis to determine eligibility and child care P-EBT benefit level.
- After the initial issuance for prior months, child care P-EBT benefits will be issued retroactively on a monthly basis.
- Issuances will be staggered to account for grocery supply pressure and program integrity.
- Due to limited data North Carolina will use the following simplified assumptions:
 - The County DSS office's address that has the NCFNS case will be used to determine the child's county of residency.
 - The child's county of residency will be used to determine the public school system(s) that will be used to determine eligibility and benefit level.
 - North Carolina will use the NCFNS county of residence for each child to determine benefit level. Benefit levels will be determined based on the following criteria:
 - If one or more schools in the public school system(s) within the county is operating on a fully remote learning mode, the child care P-EBT amount for children residing in that county will be the remote learning benefit amount.

- If not eligible for the remote learning benefit amount and one or more schools in the public school system(s) within the county is operating on a hybrid learning mode, the child care P-EBT amount for children residing in that county will be the hybrid learning benefit amount.
 - If all schools in the public school system(s) within the county are operating on an in-person learning mode children residing in that county will not be eligible for child care P-EBT.
- There are no State or local public health ordinances that limit the capacity of child care facilities due to COVID-19 in North Carolina.
- The same agencies and partners will be involved in child care P-EBT as outlined in section 4. A. of this document.
- There are no significant differences in the P-EBT for students and the P-EBT for child care. North Carolina will use the same processes as used for P-EBT for students for selection of children, issuance of benefit levels, issuance to EBT card, and communications in the P-EBT child care.

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

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

Notes:

1. Lunch rates include the 7-cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs.

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be

determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

In an effort to structure the program in a way that is easier for the PSUs to handle and more easily communicate to clients and stakeholders, North Carolina intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct amounts, one amount for students enrolled in a Remote learning mode (inclusive of students whose school district is operating an In-person or hybrid model but the family opts into fully virtual learning) and one amount for students enrolled in a hybrid learning mode (inclusive of students who are absent from an In-person learning model due to COVID and the need to quarantine).

The Remote Learning Mode benefit amount will be calculated using an average of 17 school days per month. North Carolina used an average of the total number of instructional days required by state law, which is 185. 185 days averaged over 11 months equals 17 days per month. North Carolina believes using 17 days to inform the remote learning mode amount is reasonable. This allows the state to issue one consistent benefit of \$115.94 per month, mitigating household confusion and thus reducing inquiries to North Carolina's EBT call center. All schools and students that are 100% virtual, or that have ≥ 17 virtual days within a month, will receive the Remote Learning Mode benefit amount.

The Hybrid Learning Mode benefit amount will be calculated using data from all students in schools that are not fully virtual or fully in-person during a month (hybrid). North Carolina will calculate the average number of virtual days that these students attend school across the state for each month of issuance. North Carolina has student level calendar data for all students, so this calculation will be based on the actual learning mode of students down to the actual count of days.

The general calculation logic is as follows:

Total number of virtual days for all students in hybrid schools for a month divided by the total number of hybrid students for a month = average virtual attendance for hybrid students.

With the student calendar data, North Carolina will have monthly records for each student showing the total number of days virtual, the total days live (in-person), and the total days absent. North Carolina will allocate absences proportionally between virtual days and live days. For example, if a student record for a month shows 5 days virtual, 5 days live, and 6 days absent, the count will be 8 days virtual and 8 days live.

NC will exclude student records with incomplete monthly calendar data from the calculation of the Hybrid Learning Mode average to prevent artificial skewing of the data.

NC will also exclude student records for students in hybrid schools with 17 or more days virtual in a month from the calculation of the Hybrid Learning Mode average, since those students will already be receiving the Remote Learning Mode benefit rate.

The first PEBT issuance covering August 2020 through December 2020 will be done using a combined hybrid average from those 5 months. Subsequent months will be done using the previous month's data and the Hybrid Learning Mode benefit amount will be updated based on those calculations.

North Carolina is using its experience in administering P-EBT earlier this year to better inform its 2020 – 2021 benefits issuance strategy. The state was challenged to issue benefits in the fall given the new configurations for hybrid and virtual learning and the requirement for per pupil attendance data based on one of the three learning modes previously described. In the absence of this data (at the time the P-EBT plan was due) in the Statewide Student Information System in early September, the state was unable to issue benefits to all eligible students. PSUs and their local Board of Education were making decisions about learning modes on a daily/weekly basis based upon the state's changing COVID metrics. This flexibility was required to support student, staff and community health while minimizing community spread of the virus. This dynamic made it difficult for PSUs to provide "just-in-time" data for P-EBT issuance.

To account for the fluid nature of the pandemic and that a student's status may change mid-month the state will be issuing benefits retroactively for the previous month. The student will receive the remote learning mode benefit amount if they attend in a 100% virtual learning mode. North Carolina will provide the remote learning mode benefit amount for students that attend school virtually for more than 17 days as part of a hybrid schedule.

Benefit levels will be determined for the initial payments as well as the ongoing payments on a monthly basis using the data received from DPI using the following logic to ensure no child is under issued and the equitable issuance of benefits:

- Eligible students attending school in a fully virtual mode will receive the remote learning mode benefit amount P-EBT benefits for the month.
- Eligible students attending in a hybrid learning mode school will receive the hybrid learning mode benefit amount that is equal to the daily reimbursement amount times the average number of virtual days a that hybrid students attend school for the month.
- Eligible students enrolled in an in-person or hybrid learning mode school and the student opts for a remote learning mode will receive the remote learning mode P-EBT benefits for that month.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP

households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.

- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

It is North Carolina's goal to issue P-EBT benefits to children who were excluded or under issued in the P-EBT issuances prior to the P-EBT 2020—2021 program. North Carolina will then issue August, September, October, November, and December P-EBT benefits in the month of February. P-EBT benefits issued in February will be staggered issuing one month of benefits every other day for a total of 10 days. North Carolina is exploring a methodology to issue the remaining P-EBT issuance every other day over a 10-day period for each subsequent month. January and February P-EBT benefits will be issued in the month of March and monthly on a retroactive basis for March benefits ongoing. The feasibility of this will depend on the date of plan approval and ongoing consultation with EBT processors and other state agencies. The state may need to change the issuance schedule depending on when the plan is approved and system implementation issues. The tentative approach is as follows:

P-EBT for Children in School

Day 1 – Plan approval is received.

Day 2 – Inform PSUs of the reporting criteria and submission instructions.

- Discussions have been occurring with PSUs in December on how to filter their lists appropriately (i.e., reconciling lists used in September with new direct certification or school meal approvals).

Day 10* – Deadline for PSUs to submit files.

Day 20* – File transfers to EBT processor FIS, notice production begins and public awareness campaign commences.

Day 25* – Benefits available on cards and clients are notified via text message.

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

For ongoing issuance between March and September 2021, North Carolina intends to issue P-EBT benefits monthly on a retroactive basis. Beginning in April, by the 10th day of the month, all eligible PSUs 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 learning modes. If a child or school has changed its learning mode mid-month the school will provide the date the change was made. The goal is to issue the P-EBT benefits by the 20th (10 days after receiving data from the PSUs). This allows for the necessary data clean up and file transfer to the state's EBT processor, FIS.

The state intends to follow the same distribution model utilized in previous iterations of 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. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. New P-EBT cards will not be issued to families who have already been previously issued a P-EBT card. 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 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. 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 what would need to happen to make that change. Undeliverable cards will be returned to the EBT processor, FIS who will in-turn provide the state with this information. This information will be shared with PSUs for outreach purposes (see proposal below in the "Customer Service" section).

P-EBT cards will be mailed to CCS, where they will be distributed to parents/caretakers centrally.

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.

- How will the State resolve dispute or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State’s public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a

flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.

- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

NCFNS 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 Line 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. 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 Federal Programs Division of 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. 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. 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 NCDPI's Child Nutrition and Federal Monitoring and Support Division will occur regularly to ensure resources are allocated appropriately and in a manner that supports the program integrity.

The homeless liaison in the PSU will attend training provided by the NCDPI on the P-EBT cards as well as related laws and policies. The homeless liaison will be required to track the distributions of cards, document strategies/challenges, and other issues associated with the P-EBT cards and with recipients. An annual report of findings will be submitted to the program specialist. The homeless liaison will collaborate with the PSU's School Nutrition Department and the local social service agency to distribute cards, informational literature, and other resources distributed to students, including unaccompanied youth, parent/guardians, school buildings, and local organizations.

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. Training, technical assistance, communication tools, documentation templates, the collection of data, focus group, summary report, and an action plan for supporting vulnerable populations will be completed. Collaboration with the NC DHHS and NCDPI's Child Nutrition and Federal Monitoring and Support Division will occur regularly to ensure funding is allocated appropriately.

The state is also committed to serving all eligible children regardless of primary language. In the spring the state stood up an independent P-EBT website, www.ncdhhs.gov. Furthermore, all outreach materials have been translated into required languages. These materials will be shared with PSUs to distribute to their families.

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 will announce at a press conference. The state will work with schools and community organizations to push out template emails, robo-calls and texts.

Direct Communication: For the first issuance all eligible P-EBT children will receive a notice similar to what was sent in the spring and in September that will direct them to www.ncdhhs.gov or NC DHHS' EBT call center. 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 is available in English and Spanish. 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.

Similar to the spring and September issuances, NC DHHS will create template robo calls/text/email language and sample social media posts and graphics in required languages. These outreach materials will be shared with schools, community organizations, and sister agencies. The EBT processor, FIS tracks P-EBT card pinned rates by city and town and will use that data to continue partnering with PSUs who 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 manage cases of benefit over-issuance. The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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

Response: [please use as much space as needed]

With regards to P-EBT over-issuances, NC DHHS will model its approach after the established 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 our 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 a SNAP benefits as part of the repayment arrangement. NC DHHS recognizes that neither FNS or NC DHHS currently has authority to pursue claims against households or children that were incorrectly issued benefits to which they were not entitled. 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, 2020 through September 30, 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

The forms associated with P-EBT will be modified accordingly.

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 Meals program under the Richard B.

Russell National School Meals 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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

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

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

Signature

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

Date of Amended Request: 03/05/2021