

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 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), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328)

Additional context and background for this document can be found at:

<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

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

Children in School and/or Child Care, Summer 2023¹

Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 *without* a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.

1. **State:** Ohio

2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

a. Estimated total amount of P-EBT benefits the state will issue within this amendment's date range. (Consult the appropriate table in Section 4, "Benefit Levels.")

- Estimated amount issued to school children \$81,322,560 (\$120 *677,688 students)
- Estimated amount issued to non-school children in child care² Ohio does not estimate issuing any benefits to this population as the PHE is set to end on May 11, 2023, therefore, are ineligible for P-EBT.

b. Estimated total number of children to which the state will issue P-EBT benefits.

- Estimated number of school children 677,688
- Estimated number of non-school children in child care Ohio does not plan to issue any benefits to this population as the PHE is set to end on May 11, 2023, and therefore, are ineligible for P-EBT.

c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.

¹ Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

² Conditional on the federal public health emergency declaration for COVID-19 extending into the summer months.

- School children Ohio will begin issuing summer benefits by June 20, 2023. Due to the number of children eligible and number of approval notices that will have to be printed and mailed, the benefits will have to be divided into three separate files with several days in between processing. The number of approval notices to be printed will take several days per file. Once one file is finished, we will begin processing the next file. All benefits will be available to families by the end of June 2023.
- Children in child care
- Please provide tentative issuance dates for the *potential* benefit for children in child care. Note: USDA will release additional guidance before the start of the summer to confirm the availability and finalize the value of the summer 2023 P-EBT benefit for children in child care. Ohio does not plan to issue any benefits to this population as the PHE is set to end on May 11, 2023, therefore, are ineligible for P-EBT.

d. Names of state agencies involved in administering this plan. Ohio Department of Job and Family Services and Ohio Department of Education

Response: [please use as much space as needed] Ohio commits to informing USDA of any significant increase or decrease in these data points during the summer period covered by this initial plan (or subsequent amendment).

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

- Describe how the state will ensure that households with children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

Response: [please use as much space as needed]

In April 2023, Ohio schools will be asked to provide data of all children who are eligible for free or reduced-price meals under the NSLP or SBP (including all students at Community Eligible Provision (CEP) and Provision 2 eligible schools) regardless of whether they received P-EBT benefits in the year. This data will be submitted by June 10, 2023. The Ohio Department of Education (ODE) will send a communication to all eligible schools and school districts explaining the eligibility criteria for summer P-EBT, and procedures for submitting eligible student data. This communication will state that graduating seniors are to be included in the data. Schools are responsible for: verifying school year 2022-2023 NSLP eligibility through the direct certification process, community eligibility provision or Provision 2, or the NSLP application process.

Management Council Ohio Education Computer Network (Management Council) has developed a web service that will enable each participating school or school district to submit verified and updated data for eligible students. Management Council will securely host this data and make that data visible only to identified contacts at each school.

ODE will provide Management Council with a file of all participating schools and school districts in the NSLP, including CEP or Provision 2 status for buildings and districts. Management Council will coordinate all activities with ODE and ODJFS, including file transfers, data collections, verification of NSLP participating schools, and data transfers. Management Council will securely deliver to ODJFS data files via secure file transfer. Then ODJFS will transfer the data file to the EBT vendor for card and benefit issuance.

Schools will be directed to collect NSLP applications through the end of their school year and determine eligibility and submit these students for summer P-EBT benefits. Schools will not be required to collect applications through the summer as Ohio needs to have all administrative activities related to summer P-EBT completed by 9/30/2023.

5. Summer P-EBT for children in child care:

- Describe how the state will identify children under age 6³ who are enrolled in SNAP during the covered summer period.
- Describe how the state will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period.

Response: [please use as much space as needed]

Ohio does not plan to issue any benefits to this population as the PHE is set to end on May 11, 2023, and therefore, are ineligible for P-EBT.

6. Benefit Levels

³ See school year 2022-2023 P-EBT Q&A #29 ([click here](#)) for additional information on children who reach their 6th birthday after the start of school year 2022-2023.

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139

(USDA will provide additional guidance at a later date on pro-rated summer child care benefits in the event that the PHE extends into the summer months but ends prior to the end of the summer.)

7. Implementation Timeline, EBT Processing, and Benefit Issuance

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

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that states build their timelines from the date USDA approves the state's plan (Day #0).
- The timeline must include the state's tentative issuance dates. In past years, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP state agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.

- How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

As stated above, Ohio will begin issuing summer benefits by June 15, 2023. Due to the number of children eligible and number of approval notices that will have to be printed and mailed, the benefits will have to be divided into three separate files with several days in between processing. The number of approval notices to be printed will take several days per file. Once one file is finished, we will begin processing the next file. All benefits will be available to families by the end of June 2023.

Schools will be directed to collect NSLP applications through the end of their school year and determine eligibility and submit these students for summer P-EBT benefits. Schools will not be required to collect applications through the summer as Ohio needs to have all administrative activities related to summer P-EBT completed by 9/30/2023.

All students who can be matched to a current SNAP household will have their benefits issued to the SNAP account. For students not in receipt of SNAP or who could not be matched to a current SNAP household, benefits will be issued to the active P-EBT card for the child. Families have been informed by Job and Family Services to keep the P-EBT card with previous issuances, therefore new P-EBT cards will only be issued to newly eligible children not in receipt of SNAP. The P-EBT card is a general P-EBT design and is different than Ohio's SNAP card. Any P-EBT replacement cards ordered by a family will also be the P-EBT card. Communications to families about the P-EBT program and eligibility tell them to keep their cards.

If a family needs a replacement card, they are first directed to call the EBT vendor, Conduent. If they are unsuccessful, the family can call Management Council customer service line. When a family calls Management Council the following process is used:

- Replacement card request and child information is recorded on a tracking sheet.
- Management Council sends ODJFS the tracking sheet daily.
- ODJFS staff update the address in the EBT system and issue a replacement card.

P-EBT cards that are returned as undeliverable from the Post Office to the EBT card vendor will be flagged in the EBT system as "returned". On a daily basis ODJFS will send a returned cards report to Management Council, who will then be able to determine if a family reporting they did not receive a benefit had a card returned or if data was not provided from the school. When the families or schools provide a correct address, Management Council will provide the updated information to ODJFS. ODJFS staff will then issue a replacement card through the EBT system.

The sub-benefit type will be P-EBT and the availability date will be determined by the child's last name (as described above). The P-EBT benefit will have the highest spend priority amongst all benefit types and will follow the standard 9 month expungement rules.

At the request of Ohio's grocers, ODJFS staggers the availability date of the benefits. The availability date depends on the date the benefit file is sent to the EBT vendor, how many days are remaining in the month, and the first letter of the last name of the child. More specifically, from the date of the benefit file generation, Ohio will divide 26 (number of letters in the alphabet) by the number of days remaining in that month. Then the availability of benefits will be staggered on those remaining days by groups of letters in the alphabet. For example, in June if the benefit file is sent on 6/14, there will be 15 days left in the month. $26 \div 15 = 1.7$, rounded up to 2. Thus, the availability date for kids whose last name is starting with A and B will be 6/15; availability date for C and D will be 6/16; and so on and so forth until the availability date for all alphabet letters (i.e. kids) is established.

8. Customer Service

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- 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 to 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]

In order to communicate with families about the summer P-EBT program and eligibility criteria, ODJFS and ODE will develop a Q&A document that schools will be asked to make the available to all families, utilizing multiple methods of communication. The document will explain how to PIN the card, what to do if they do not want the benefits, how benefits can or cannot be used, and the customer service number to call with questions. The Q&A document, and the P-EBT card buck slip (with instructions on how to PIN the card) will be translated into other languages, including but not limited to Spanish and Somali. ODJFS will post both the English and non-English versions of the documents on its website and will share them with our advocate partners. ODJFS will also use social media to announce the summer issuance under this plan. ODE will publicize this information on their webpage and link to the ODJFS website and tools and use social media to promote awareness.

ODJFS implemented functionality in its SNAP eligibility system to assist in automating the file process to the EBT vendor. This functionality will produce a notice for each child that is issued a P-EBT benefit. It will provide the following information: child's name, child's DOB, benefit amount, benefit month, benefit issuance date, whether the benefit was issued to an active SNAP account or to a P-EBT card, and a brief description of what benefits can and cannot be used for. It will also provide a phone number for clients to call with questions about the program or the benefits. This notice will be issued with each monthly benefit issuance. It will also contain static text in both Spanish and Somali providing the customer service phone number to call for translation assistance.

The P-EBT customer service line has been operational since May 2020 and will continue to be operational through at least September 2023. Management Council manages all customer service calls as it is best situated to research benefit issues. It will be responsible for handling all the phone support for parents regarding P-EBT benefits, including benefit disputes and issuance errors. Management Council will provide, host, and manage the Service Desk software that will track each customer contact and child query being handled by Management Council Service Desk. Management Council will provide JFS and ODE service desk reports reflecting activity and performance. Management Council has access to translation services to assist limited-English proficient families.

If a family contacts support stating a belief that their child should have received a benefit, Management Council will collect the relevant information and work with ODJFS to determine if eligibility exists.

As with previous P-EBT benefits, schools and school districts can offer to have P-EBT cards mailed to them for homeless youth.

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

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]

Management Council and ODJFS will log and track over-issuances identified. If an overpayment occurs, Ohio proposes to reduce future P-EBT benefits by the amount of the overpayment until it is repaid in full upon approval from FNS. If the benefit cannot be repaid in full by offsetting with future benefits, then Ohio will not seek recovery of the remaining amount. SinceThe benefit per child is only \$120 and the state would incur more administrative costs in establishing the claim and seeking recovery than the cost of the actual overpayment, we would not pursue claims that are only \$120.

When reducing P-EBT benefits to repay an overpayment, Ohio would notify the families through a robo-call or robo-text that would provide the specific amount of the overpayment and the amount of benefits reduced. If the schools did not provide a valid phone number in the data, Management

Council will work with the schools to make contact with the family to provide notice of the overpayment and offset of current benefits.

Ohio will notify USDA of all over-issuances through the over-issuance spreadsheet from USDA and will not attempt to reclaim benefits from households before consulting with and receiving approval from USDA.

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

12. Release of Information

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

13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:



Signature
Betsy Suver, SNAP Director



Signature
Brigette Hires, Child Nutrition Director

Date of Request: 4/14/23 Revision