

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

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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 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: Ohio

- 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
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Response:

This plan covers August 2021-June 2022 for all children in school. P-EBT benefit files will sent to the vendor as follows:

- The first issuance for August, September, and October 2021 benefits will be issued by end of November (if FNS plan is approved before the end of the November).

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).

- Then benefits for each month will be issued by the end of the following month. (E.g. **November** benefits will be issued by the end of **December**, **December** benefits issued by the end of **January**.)

At the request of Ohio’s grocers, ODJFS is going to stagger the availability date of the benefits. The availability date will depend 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 **November** if the benefit file is sent on 11/20, there will 10 days left in the month. 26 divided by 10 equals 2.6, rounded up to 3. Thus, the availability date for kids whose last name is starting with A, B, and C will be 11/20; availability date for D, E and F will be 11/21; availability date for G, H and I will be 11/22 and so on and so forth until we established the availability date for all alphabet letters (i.e. kids). This process applies to all SNAP and non-SNAP school children. **If for some reason benefit files get delayed beyond the end of the month, the benefit will be combined with the next month’s benefit and follow the staggered issuance process.**

Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment’s date range. (Ohio made estimates based on **August and September data received from schools which shows 126,500 school students eligible for an average of 7 days per month.**

- Estimated amount issued to school children in SNAP households = **\$2,514,820** per month and **\$27,663,020** for the school year
- Estimated amount issued to school children in non-SNAP households = \$**3,772,230** per month and **\$41,494,530** for the school year

Estimated total **number** of children to which the State will issue P-EBT benefits.

- Estimated number of school children in SNAP households = **50,600**
- Estimated number of school children in non-SNAP households = **75,900**
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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.

Response:

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

- The Ohio Department of Job and Family Services (ODJFS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards (through its vendor), and providing notices to clients.

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.

- The Ohio Department of Education (ODE), in collaboration with Management Council Ohio Education Computer Network (Management Council) are responsible for communicating with local school districts about P-EBT eligibility criteria and data submission requirements. Local school districts and schools are responsible for identifying P-EBT eligible children and submitting data to Management Council. Management Council Ohio Education Computer Network (Management Council) will compile all school data into one file on a monthly basis and send to ODJFS. Additionally, they will manage the customer service and support call center.

To identify eligible children, Ohio will use data provided by eligible schools and school districts directly. Eligible schools or school districts include those that traditionally participate in the National School Lunch Program and have all students participating in fully remote learning, schools that have students in a hybrid learning scenario and schools with all students in attendance, but have students whose parents opted for fully remote learning due to COVID-19 (not virtual learning academies), or have students that have had to quarantine due to COVID-19. .

ODE will send a communication to all eligible schools and school districts explaining the eligibility criteria for P-EBT, and procedures for submitting eligible student data and number of eligible days. Schools will also be directed to remove students who have graduated or moved out of the school or school district, and add students newly eligible for free or reduced meals. Schools are responsible for: verifying NSLP eligibility through the direct certification process, community eligibility provision or Provision 2, the NSLP application process, or through 2019-2020 or 2020-2021 eligibility; ensuring a meal was not received by the student at school (for both SNAP and non-SNAP recipients); and the number of days the child is eligible for P-EBT. **Schools will use their most recent eligibility determination which could be from any of three school years. If a school or school district collected applications at the start of this school year for purposes of returning to normal NSLP operations, those applications – and not a prior year’s applications – must be used to determine P-EBT eligibility.**

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. Every month the schools and school districts will have to submit student data for the *previous month* with the exception being the month of October where schools will submit applicable August and September data. Issuing benefits retrospectively removes the potential for schedule changes occurring before benefits are issued.

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, as well as any newly qualified or participating schools or school 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.

Ohio is not using any simplifying assumptions.

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:

Every month schools and school districts will submit their students for the previous month, which will include how many days each NSLP eligible student was not scheduled to attend in-person (or attend at reduced hours) and did not receive a meal at school. After the first issuance, benefits will be issued retroactively on a monthly basis. Issuing benefits retroactively, rather than prospectively, removes the need to ensure there are no changes in status before benefits are issued. No simplifying assumptions will be used.

In addition to the eligibility criteria described above, the following clarifications are based on FNS guidance:

- Students (who are eligible for free or reduced-price meals) will be eligible for P-EBT when they are absent from school due COVID-19 (e.g. student is sick or quarantined **by the**

school's quarantine criteria). Once eligible, the student will receive benefits for each day they are absent from school due to COVID-19, regardless if their attendance schedule is normally fully in-person or hybrid.

- Districts or schools operating fully in-person with an option for families to choose fully remote learning due to COVID-19 will have eligible students if a single student has opted into a fully remote learning for 5 consecutive days.

Eligible children will include Preschool (Pre-K) through 12th grade students within the eligible school buildings who are eligible for free or reduced-price meals through NSLP or SBP and did not receive a free or reduced-price meal to eat at school.

A quarantine day will be determined based on a school official directing a child to quarantine and remain home based on school quarantine criteria. Examples of a school's quarantine criteria includes: a child remaining at home because of exposure to another student who tested positive for COVID-19; the child has tested positive for COVID-19 and is not permitted to return to school; and a family member of the child has tested positive for COVID-19 and the child is not permitted to attend school. Quarantine days will not include families reporting a child is sick and is unrelated to COVID-19.

If a school has to tell a class of students to not attend school because their teacher is sick with COVID-19, these days will qualify as reduced attendance for P-EBT purposes. This would apply as well to days when the school tells children not to attend school because bus drivers are sick with COVID-19. Staff shortages due to being unable to fill positions do not qualify as COVID-19 related. For example, a school having to close school because they do not have enough bus drivers on staff to transport children would not be used in determining eligibility for P-EBT. However, bus drivers on staff who become sick due to COVID-19 and school had to be closed as a result would be used in determining P-EBT eligibility.

ODE is providing guidance to schools that a student must be enrolled in and attending a school that qualifies to participate in the National School Lunch Program and that school must either be participating in the National School Lunch Program or the Seamless Summer Option in school year 2021-2022 to qualify for P-EBT. Online Learning Schools/ Virtual Academies with no assigned/ affiliated physical school building do not qualify for the National School Lunch Program and enrolled children do not qualify for P-EBT.

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:

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:

Ohio will provide \$7.10 for each eligible day the student is learning remotely or scheduled to be at school with reduced hours of attendance and did not receive a meal at school; or for each day they are not at school due to COVID-19 (e.g. sick or quarantined). Ohio will not be using any simplifying assumptions for school age students.

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:

On September 10, 2021 eligible schools and school districts were notified that P-EBT was authorized for the school year and were urged to begin taking NSLP applications for new students if they had not already done so.

Ohio plans to collect student data from the schools and school districts every month and issue benefits retroactively. The first round of benefits will be issued by the end of October and will be for P-EBT benefits in August and September. After the first issuance in October, benefits will be issued monthly based on data from the previous month. For example, the second issuance will occur by the end of November for October benefits. The timeline for the first issuance is:

- ODE sent a communication to schools in mid-late September regarding who is eligible to receive P-EBT for the 2021-2022 school year and will include instructions on data submissions.
- Data collection from the schools will begin on October 1st and will conclude October 14th.
- If the plan is approved by FNS, ODJFS plans to send the benefit file (for August/September/October benefits) to the EBT vendor in the last two weeks of November.
- All benefits will be made available during the month of November.

- If the plan is not approved by FNS in November, then benefits will be issued in December along with November’s benefits in accordance with the staggered issuance process outlined above.

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 told 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.

P-EBT cards that are returned 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 in section 3 above). The P-EBT benefit will have the highest spend priority amongst all benefit types and will follow the standard expungement rules.

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:

In order to communicate with families about the P-EBT program and eligibility criteria, ODJFS and ODE will develop a flyer and a Q&A document that schools will be asked to make the communication available to all families, utilizing multiple methods of communication. The documents 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 flyer, 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 first issuance

under this plan. ODE will publicize this information on their webpage and link to the ODJFS website and tools and also use social media to promote awareness.

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

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 June 2022. Management Council manages all customer service calls as it is best situated to research benefit issues and make contact with the schools. It will be responsible for handling all of the phone support for schools and 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 student 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 contact the school. Upon verification that the student should have received a benefit, the school can then submit the student during the next data collection for all previous months in which a student did not receive a benefit. If the family is questioning the number of days for which the student should have received the benefit, upon verification the school can submit an updated number of applicable days. Additionally, for disputed custody issues, families will be directed to work with the school, and the county agency if necessary, to have the information corrected. Once the schools submit the corrected information, benefits will be re-issued to the correct family for the first full month custody and PEBT eligibility began in the school year.

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:

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

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:

Management Council will log and track over-issuances reported by schools and school districts or by individuals who call the customer service line. If an overpayment occurs, Ohio will reduce future P-EBT benefits by the amount of the overpayment until it is repaid in full. If the benefit cannot be repaid in full by offsetting with future benefits, then Ohio will not seek recovery of the remaining amount. Since benefits are issued a monthly basis, the most an overpayment for a month would be is \$142 (assuming 20 days of benefits). The state would incur more administrative costs in establishing the claim and seeking recovery than the cost of the actual overpayment.

When reducing P-EBT benefits to repay an overpayment, Ohio will notify the families through a robo-call or robo-text that will 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.

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:

Betsy Suver Betsy Suver, SNAP Director

Signature
Print Name and Title

Brigette Hires Brigette Hires, Director

Signature
Print Name and Title

Date of Request _____ 11/4/2021 _____