

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for 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).
<b>Disclaimer:</b>	<b>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.</b>

*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 should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.*

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

1. **State:** Oklahoma
2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);  
Continuing Appropriations Act, 2021 and Other Extensions Act;  
Consolidated Appropriations Act, 2021

3. **Executive Summary:**

***\*\*Note that P-EBT benefits for school children are available from the start of 20-21 school year for newly eligible NSLP students. However, P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.***

***\*\*Oklahoma has already received approval for the population of children in school. This plan is strictly for children under 6, that are currently receiving SNAP .***

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

*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.*

***\*\*Oklahoma has already received approval for the population of children in school. This plan is strictly for children under 6, that are currently receiving SNAP and in childcare.***

- a. The *date range* covered by this State plan or amendment
  - for children in school-
  - For children in child care- ***October 1,2020 – May 30, 2021***
  - ***For anticipated benefit amount calculation, the state will assume the 180 days of School Year (SY) instruction for maximum total amount of benefits to be issued. DHS will utilize the FNS assumption that every child under the age of 6 must be receiving SNAP benefits in order to be considered eligible for the child care PEBT benefit.***

- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.

**For the 19-20 SY, SNAP households were 20.94% of the overall households that were issued PEBT benefits. Oklahoma will make the simplified assumption that the same 20.94% of PEBT households for the 20-21 SY will be SNAP households for the calculations below. This process mirrors the process of our School Children PEBT for SY 20-21.**

- Estimated amount issued to school children in SNAP households.  
*Not applicable in this plan as it is strictly concerning childcare and school children are not included in this population. Oklahoma's school age PEBT plan was approved 6/14/21. DHS has a process in place that will compare the list of those 5&6 year olds from the school age list with that of the children that are under the age of 6 that are SNAP recipients that would be eligible for Childcare PEBT benefits to ensure that there is no double issuance of the benefits.*

- Estimated amount issued to school children in non-SNAP households

*Please see the response above regarding school age children in SNAP households as the response applies to this section as well.*

- Estimated amount issued to non-school children in child care. *DHS has run a query as to the number of non-school children under the age of 6 currently receiving SNAP. That number is 68,966. DHS will utilize the FNS assumption that all children under the age of 6 are considered to be enrolled in child care. For estimate purposes, DHS will assume that 50% of the population will receive the full benefit of 6.82 and the remaining 50% to receive the partial rate of 3.41. Therefore 50% of this population, 34,483 children will receive the full rate of 6.82. That is  $6.82/\text{day} \times 180 \text{ days} \times 34,483 \text{ children} = \$42,331,330.80$ . Furthermore 50% of this population, 34,483 children will be estimated to receive the partial rate of 3.41. That is  $3.41 \text{ per day} \times 180 \text{ days} \times 34,483 \text{ children} = \$21,165,665.40$ . Total cost estimate at this time is the sum of  $42,331,330.80 + 21,165,665.40 = \$63,496,996.20$ . That being said, the State of Oklahoma has the intention of issuing non school age PEBT benefits equal to the statewide average of benefits issued to school age children by month. Said benefit amount will be determined by DHS running a query as to the total amount of PEBT benefits issued to school age children and averaging that amount monthly. For each month from October through the end of the school year, DHS will determine whether any school in the county has at least one school that is issuing PEBT benefits to its students. If the state identifies at least one school in a county that is issuing PEBT benefits to its students, all SNAP enrolled children under the age of 6 in the county will receive a PEBT benefit equal to the average statewide PEBT benefit for school children during that month. The statewide average child care PEBT benefit will be equal to the total value of PEBT school benefits issued in the month divided by the number of PEBT student beneficiaries. This amount will then be issued as PEBT benefits for non school age children residing in SNAP households that are considered by FNS assumption to be enrolled in childcare. It should also be noted that the number of children under 6, currently receiving SNAP will fluctuate throughout the year and the rate will not be the full rate of 6.82 for all of the beneficiaries. However, DHS will have to wait until we issue school age PEBT benefits before we can determine the overall issued monthly benefit amounts for non school aged children. In addition, there will be some of these children that have already received PEBT as school children as they attend kindergarten and receive their meals at school. Those children will not be included in the child care PEBT benefit population.*

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
- Estimated number of school children in SNAP households  
*Not applicable in this plan as it is strictly concerning childcare and school children are not included in this population. Oklahoma's school age PEBT plan was approved 6/14/21. DHS has a process in place that will compare the list of those 5&6 year olds from the school age list with that of the children that are under the age of 6 that are SNAP recipients that would be eligible for Childcare PEBT benefits to ensure that there is no double issuance of the benefits.*
  - Estimated number of school children in non-SNAP households  
*Please see the response above regarding school age children in SNAP households as the response applies to this section as well. .*
  - Estimated number of non-school children in child care **68,966 non-school children receiving SNAP benefits that are in child care. The guidance issued by FNS states that states can make the assumption that all children under the age of 6 that are SNAP recipients are considered to be enrolled in child care.**
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup> *The full amount of administrative costs are not known at this time. Currently:*
- \*The cost associated with Conduent is budgeted at \$10M. This may change as DHS will be paying for each card this round and the processor will be responsible for handling all replacement card requests.*
  - \*The contract associated with development of the RP is for \$310K. However, that is only for the actual development of the program. There are other costs related to this project. Oklahoma's change order with Conduent was provided with the school age PEBT benefit state plan.*
  - \*The plan will be updated once all administrative costs are known to DHS and the administrative grant request is prepared for submission.*
- 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

***Children in child care: DHS must compare 5 & 6 year old school children with the same age group of child care children, to avoid duplicating benefits. As such, DHS will begin issuing benefits to SNAP recipients under the age of 6, in child care on or after October 15, 2021.***

<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

#### 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 for P-EBT. Also describe what measures the State will take to prevent the issuance of 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).
- 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.

## **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.

## **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. ***According to FNS guidance, all children under the age of 6 that are current SNAP recipients, are considered to be enrolled in child care for the purposes of PEBT.***
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements? ***The State of Oklahoma has run a query for a count of all SNAP recipients under the age of 6. The result was 68,966 SNAP children that will be considered to be enrolled in child care via FNS guidance.***
- 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? ***DHS will take an average of the total PEBT benefits issued to school children each month and apply that benefit amount to non school age children that by FNS assumption are considered to be in childcare. In addition, DHS has comprised a calendar for the maximum potential virtual days per month and will be cross referencing data to identify possible cases of reporting errors and to ensure that we do not over issue benefits that would result in an overpayment.***
- 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 ***DHS does not have the capacity nor the data available to make such a determination.***
  - 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? ***Please see explanation above.***
- 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? ***N/A***
- 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.) ***Please see the 3<sup>rd</sup> bullet point above for explanation.***
- 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).

*DHS has run a query for a count of all SNAP recipients under the age of 6. The result was 68,966 SNAP children under the age of 6 that will be considered to be enrolled in child care via FNS guidance.*

*DHS will compare this list of children to those that received school aged PEBT to ensure that any children that are receiving PEBT as they were in kindergarten do not receive duplicate benefits.*

*Oklahoma State Department of Educations (OSDE) will provide DHS with a list of the predominant learning model by county and by month for all 77 counties in the state.*

*DHS will issue child care PEBT benefits to eligible children that are currently receiving SNAP equal to the statewide average benefit for school children in that month. All recipients will receive childcare PEBT benefits on their current SNAP EBT card.*

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

## 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 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 (NEW)	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

*DHS will issue non-school child care PEBT benefits equal to the statewide average benefit for school age children in a particular month, they must currently be receiving SNAP, and not have been issued school aged PEBT benefits. This will ensure program integrity and accuracy of amount of benefits issued, thus reducing the instances of over issuance and/or fraud. Holidays and other days in which there is no school instruction will not be counted as eligible days.*

## 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 Reporting Platform (RP) was completed in June 2021. Training will have to be arranged for the schools by OSDE which will be done as soon as we have the RP demo to them. The “go live” date for the RP was approximately 7/1/21 and school districts received guidance for use at that time. The plan can be amended once the “go live” date has been determined. OSDE planned on having all information/data to DHS by July 17, 2021. However, there was some misunderstandings with the school districts as to how to enter data, coding the data correctly. Some districts had to revise and resubmit data causing a delay in the accurate reporting.*

***\*\* 0-30 days post launch- data for prior months should start being received by the State. Once a full month of information is received, within 7 business days, the State shall send a file for benefit transmission to processing vendor Conduent to issue the benefits.***

***\*Public media campaign will launch during this time as well.***

***\*\*Subsequent month's issuances will be sent to Conduent within 7 business days of State receiving the information files from OSDE and the non-public schools. Due to the limited amount of time that the state has to issue the benefits, there will not be a formal dated timeline as to when benefits will be issued. The State will issue benefits as soon as the monthly information from the schools is received. Oklahoma will be issuing the different classifications of PEBT benefits in stages. Oklahoma's standard process of benefit issuance is staggered by case number groups. These groups are defined by the last number of their 6 digit case number. For example, case Q482697 would be considered to be in group 7. Issuance occurs in groups of 3 (789, 456, 0123). The 3 staggered groupings will each receive a one-time standard issuance of \$375. This will take place after we complete the regular 20-21 school year benefits scheduled to begin 9/17/21. We have the intention to begin issuing Child Care PEBT benefits by 10/31/21. Our intent is to issue school age benefits starting 9/17/21, followed by child care benefits starting 10/31/21 and then summer benefits after 11/30/21.***

- 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? ***Yes, the State will issue PEBT benefits on a unique card design.*** If so, who will receive these cards, non-SNAP households only? Or also SNAP households? ***All PEBT recipients will receive a unique card that will have a buck slip included in the envelope with the card, and a letter will be mailed out to each recipient giving them more detailed information about the program, how to pin/use the card, what kinds of goods the card can be used for and what to do if the recipient does not want the benefit. PEBT cards began being sent to recipients on 9/17/21. The letter of explanation began being sent to recipients on 9/17/21. The timing was done intentionally so that the recipients receive the letter and the card at approximately the same time.***
- 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. ***PEBT benefits will be distinguished from SNAP and D-SNAP benefits with the use of a sub-benefit type code "LC" in the eligibility system.***
- 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. ***PEBT benefits will have priority and spent first before SNAP and D-SNAP.***

- 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. ***Oklahoma will follow the same expungement plan as the SNAP program. All PEPT expungements will be set to 274 days.***
- 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? ***The need for replacement cards will be handled by EBT vendor Conduent.***
- Will you issue ***new*** P-EBT cards to existing P-EBT households? ***Yes, any recipient of PEPT benefits for SY 20-21 will receive a new unique PEPT card.***
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households? ***All recipients for SY 20-21 will receive new, unique PEPT cards for use.***
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card? ***N/A***

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

## 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 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. ***Eligibility questions as well as the benefit amounts (based on the number of virtual instruction days per month) will be addressed by the local school districts. Card issuance and benefits transmission issues will be handled by DHS. There will be an e-mailbox ([PEBT@okdhs.org](mailto:PEBT@okdhs.org)) set up for schools to contact DHS if they are showing that they have the correct data for a child entered into the RP and that the benefits were not issued. Said e-mailbox will be monitored by the DHS SNAP unit at State Office. The same process will be in place for non-public school staff as well. Any public inquiries that reach National Office can be forwarded to the same email address. In addition, DHS has established a BEST survey for families to access/respond to in regard to address changes and/or benefit transmission issues. This document is currently active and accessible via DHS website at [www.okdhs.org](http://www.okdhs.org). The individual may call the (405)522-5050 Benefits Line***

*and or their worker for information regarding the issuance of their benefits or card issues. However, if the inquiry is regarding eligibility, they will be referred to the SDE website to fill a form regarding the issue. SDE will have that form available on their website effective 10/15/21.*

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, and children with limited English proficiency, households without internet access, and people living with disabilities. *Every public school student in the state is issued an identification number upon entering the OSDE system that follows them throughout their entire scholastic career. This unique identifier is known to families of the public school system as it is the identifier used to enroll the student in school each year as well as used for school lunch payments/tracking. This unique identification number will compensate for children without social security numbers, foster children and homeless children.*

*Non-public schools are assigning the same type of unique identifier to their PEBT eligible students. This assigned identifier will be using a different range of numbers than OSDE to avoid any duplication in numbers.*

*There is not an application process required by the state in order to receive PEBT benefits. The State will be issuing benefits and PEBT cards based on the information that is provided to DHS systems personnel by OSDE and the DHS unit responsible for non-public schools. There will be contact information included in the media campaign that will inform students and their families as to how and who to contact with possible issues related to the PEBT program.*

- 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). *Oklahoma will conduct a public information campaign with a media release as well as social media release alerting Oklahoman's about the PEBT program details as well as how the benefits can be used. DHS will send out a letter to households receiving PEBT that:*
  - \* *Describes the program*
  - \* *Explanation of how and where benefits can/cannot be used*
  - \* *Explanations of violations and penalties (such as trafficking)*
  - \* *Notification that benefits are non-transferable*
  - \* *Information regarding a hotline, help desk, or website/portal that participants can reach out to, if they have questions and/or need assistance. Including when to contact their school and when to reach out to DHS*
  - \* *In addition, a buck slip will be inserted with PEBT cards that contains information about how to pin the card, what to do if the household does not want the benefit and a nondiscrimination statement.*
- 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. *Oklahoma will include a buck slip with the PEBT card that contains information about the program, including what to do if a household does not want the PEBT benefit that they have been issued.*

- 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)

*Oklahoma will include a buck slip with the P-EBT card with information about the program, how to activate the card as well as how the P-EBT card can be used. It will also inform how long benefits will remain on the card. The buck slip has one side English and the other Spanish. There are also two phone numbers on the buck slip with one to report problems with the card and one for contacting Oklahoma Human Services regarding problems associated with issuance itself or to decline the benefits. A letter has been developed and mailed to all P-EBT households identified that explains relevant program information to potential or actual P-EBT households. The State will develop a process for corrections regarding eligible P-EBT households who were not included in data match for P-EBT eligibility.*

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households? *Please see above response.*
  - 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. *Oklahoma will utilize the use of both buck slips and a letter that will be mailed to both SNAP and non-SNAP households, that are PEBT eligible, with relevant information about the program,*
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means? *The State intends on providing information on social media platforms as a part of their public information campaign.*

## 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.

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

*In coordination with the Oklahoma State Department of Education the Oklahoma Human Service Benefit Integrity and Recovery team will review all referrals of potential overpayments for validity. If an over-issuance can be proven, Benefit Integrity will issue notices and begin collection efforts against the payee recipient of the PEBT benefit. This data will be coded and stored separately from SNAP benefits. This separation of data will meet the requirement that SNAP benefits not be reduced for this debt; even in the case of an individual who has both a SNAP claim and a PEBT claim. If the PEBT benefit remains unused or the card is never activated the PEBT benefit will be recouped from the EBT card to resolve the overpayment. If the over-issuance is disputed, the Agency will follow our Fair Hearing Appeal process. OSDE would cooperate with DHS on the establishment of any overpayment.*

## 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. *The State agrees to comply with the above 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.

*Oklahoma acknowledges the responsibility and accountability above.*

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.

*Oklahoma has already submitted this information via of a corrected 366A on 9/24/21.*

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. *DHS is in the process of collecting data to be included in a budget plan for administrative funding grant. This plan can be amended once that data collection is complete and State administrative costs have been confirmed.*

## **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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

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

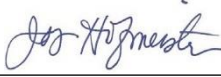
The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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

Signature

Print Name and Title

Joy Hofmeister, State Superintendent of Public Instruction




Digitally signed by Joy  
Hofmeister Date: 2021.09.03  
09:21:34 -05'00'

Signature

Print Name and Title

Justin B. Brown, Director of Oklahoma Human Services



Justin

Digitally signed by Justin  
Brown Date: 2021.09.22  
13:49:48 -05'00'

**Date of Request:** September 30, 2021