



Food and Nutrition
Service

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January 18, 2023

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Ohio's State Plan for Children in Schools
and Child Care, School Year 2022-2023

TO: Vista Fletcher
Regional Administrator
Midwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Ohio's enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Ohio Department of Job and Family Services, the Ohio Department of Education, and the Ohio Education Computer Network (Management Council) will issue P-EBT benefits through the state's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The state's plan covers the months of August 2022 through May 2023.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The state will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days those eligible children do not receive a meal service through their schools or child care facilities.

Children in Schools

The state and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2021-2022 graduates and other non-students and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes. The state will also provide a path for households with eligible homeschooled children and children in fully virtual schools to receive benefits; these children may be eligible if they began homeschooling or enrolled in fully virtual school due to concerns about the COVID health emergency.

In addition, Ohio has or will:

(for children currently enrolled in NSLP-participating schools)

- communicate the P-EBT eligibility requirements to NSLP-participating schools and school districts including current eligibility for free or reduced price meals and lack of access to meals at school due to a COVID-related absence or school-approved COVID-related virtual learning day,
- instruct NSLP-participating schools and districts to provide each student's P-EBT eligible days to the state's P-EBT portal managed by Management Council ahead of the state's planned benefit issuances:
 - NSLP schools that are tracking COVID-related absences and virtual learning days will report those P-EBT-eligible days for each student,
 - parents of children with COVID-related absences or virtual learning days in NSLP schools that are not tracking that information will contact their schools and attest that specific days are COVID-related; the schools will confirm that the days are at least recorded as excused absences before entering those days into the P-EBT portal,
- tentatively issue benefits for the months of August 2022 through December 2022 in a single issuance in January or February,
- issue benefits retrospectively, on a monthly basis, for the rest of the school year,
- issue benefits on a staggered schedule each month based on the first letter of the child's last name,
- monitor the data submitted by the SFAs; the state will contact the SFA if any outliers are identified,

(for eligible children attending non-NSLP virtual schools and eligible homeschooled children)

- conduct a public information campaign to encourage households of potentially eligible children to apply for benefits through the state's P-EBT website:
 - the state's public information campaign will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children enrolled in homeschool or virtual school from the start of the public health emergency and the date of the plan approval by USDA,
- develop an application that consists of a school year 2022-2023 free and reduced price meal application, requires applicants to provide documentation for all income sources, and requires applicant to respond to a set of supplementary questions to confirm the remaining eligibility criteria:
 - applicants will select the reason their children attend a non-NSLP virtual school or are homeschooled; only applicants that select COVID concerns as the reason will be potentially eligible for P-EBT,

- applicants will provide the names of their children's previous NSLP-participating schools or indicate they have never been in an NSLP school, if in kindergarten through second grade:
 - for non-K-2 children previously enrolled in an NSLP-participating school the state will send the children's names to the school for confirmation of their previous enrollment at some point on or after the start of the pandemic; if not confirmed, the children will not receive benefits,
- applicants of children in virtual schools will provide the name of their children's virtual school; applicants of children in homeschool will provide the name of the public school district where the child's homeschool plan is filed:
 - the state will send the children's names to the applicable virtual school or public school district; children not confirmed as currently enrolled in virtual school or homeschool will not receive benefits,
 - children who unenroll from an in-person school to begin homeschooling or to enroll in a fully virtual school after the date of approval of the state's P-EBT plan will be denied benefits,
- the state will collect information (such as but not limited to SNAP case number) to determine categorical eligibility for free meals; the state will also determine whether the child's local public school participates in CEP,
- for children who are not categorically eligible for free meals or whose local public school does not participate in CEP, the state will confirm income eligibility through the free and reduced price meal application:
 - children determined income eligible for free or reduced price meals will be assumed income eligible back to the start of the school year if they submit their applications in the first month of the P-EBT application's availability; other households will be assumed income eligible from the date of the application,
 - the state will use the income documentation provided by applicants to verify eligibility as follows:
 - the state will confirm that the documentation matches the income entered on the application for the first 100 applications received,
 - if the error rate on the first 100 applications is at or above 5 percent, the state will continue to verify all applications,
 - if the error rate is below 5 percent, the state will verify 10 percent of remaining applications; if at any time, the error rate rises above 5 percent, Ohio will resume verifying the documentation for all applicants,
- the application will require parents to promptly notify the state if their children return to an in-person school during the school year,

- the state will provide USDA the opportunity to review the application prior to implementation,
- issue benefits to homeschooled and virtual school students as their applications are approved:
 - the state will issue initial benefits for all prior months in the month following application approval,
 - tentatively open the online P-EBT application for virtual and homeschool children in February 2023,
 - tentatively issue benefits for the months of August 2022 through application approval in a single payment,
 - issue benefits retrospectively on a monthly basis for the rest of the school year,
 - issue benefits on a staggered schedule each month based on the first letter of the child's last name, consistent with the issuance schedule for all other school children.

Children in Child Care

At a minimum, the state will identify all children under age 6 who are enrolled in SNAP in the benefit month. The state will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the state will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Ohio has or will:

- identify SNAP-enrolled children under age 6,
- determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2022-2023 to the same months prior to the pandemic,
- issue an average benefit to all eligible children statewide for the months Ohio experienced a reduction in child care access:
 - multiply the reduction in claims by the average monthly number of instructional days for school children in the same months (180 days over 10 benefit months for an average of 18 days per month), and by \$8.18, to determine the average monthly benefit:
 - issue benefits for August through December 2022 in January or February based on the reduction in CACFP claims for August and September 2022 compared to August and September 2019,
 - issue January 2023 benefits in February based on the September and October 2022 data compared to September and October 2019,
 - issue February 2023 benefits in March based on October and November 2022 data compared to October and November 2019,

- issue March 2023 benefits in April based on November and December 2022 data compared to November and December 2019 data,
 - issue April 2023 benefits in May based on December 2022 and January 2023 data compared to December 2019 and January 2020 data,
 - issue May 2023 benefits in June based on January and February 2023 data compared to January and February 2019 data,
- provide USDA with the state’s tentative average benefit for confirmation prior to issuing benefits,
 - confirm that lunch claims, for the most current months where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months.

Finally, the state will identify risks for improper payments and ensure a high level of integrity.

Estimated Caseload and Value of P-EBT Benefits

The state will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State’s plan.

- Ohio estimates that it will issue \$11.5 million to approximately 14,000 school children for school closures and reductions in attendance and hours extending from September 2022 through May 2023.
- Ohio estimates that it will issue \$84.2 million to approximately 206,000 SNAP-enrolled children in child care from September 2022 through May 2023.

Release of Information

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Ohio. Section 1101(e) of the Act states, “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.”

Plan Timetable and Revisions

Ohio will distribute benefits to households consistent with the timeframes identified in the State plan. Should the state encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the state must notify the FNS Regional Office as soon as possible. The FNS

Regional Office will work with the state to identify reasonable solutions and review revised plans for approval or further revision.

Civil Rights

Ohio 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.

Administrative Funds

The Ohio Department of Job and Family Services will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the state's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the state's operational plan evolves.

Reporting

The Ohio Department of Job and Family Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS values Ohio's partnership in the administration of Pandemic EBT. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long
Administrator