

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

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 School and Child Care, 2020-2021

1. **State:** Ohio

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

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

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.

¹ 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.

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

Response:

Ohio proposes to amend its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from August 1, 2020 through September 30, 2021 for 2020-2021 school year benefits. Ohio’s original plan estimated 490,000 students were eligible for P-EBT, and with the new eligibility criteria, it is estimated an additional 110,000 students will now be eligible for benefits, totaling 600,000. Based on the first iteration of P-EBT issuances in Spring 2020, it is expected 41% of eligible students will be matched to a current SNAP account. **Based on a data from October 2020, Ohio estimates 202,000 non-school children under the age of 6 and in a SNAP household will be eligible on a monthly basis.** Ohio will be issuing \$6.82 for each day a child is eligible for P-EBT; **No simplifying assumptions will be used to issue an average amount for school age children. In order to calculate benefit estimates, an average of 15 school days per month for each student was used for school aged children We now have data for the months of October, November and December, and know the average number of days in October was 17 days, therefore, 17 days was used to calculate the estimated benefits for non-school children under the age of 6 and in a SNAP household.**

The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

- **Date range of plan**
 - **August 1, 2020-September 30, 2021 for children in school**
 - **October 1, 2020 – September 30, 2021 for non-school children under the age of 6 and in a SNAP household**
- **Estimated monthly amount of benefits to be issued**

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

- For children in school =\$52,740,000
- For non-school children under the age of 6 and in a SNAP household = \$23,419,880
- Estimated total amount of benefits to be issued = \$703,018,920 (This amount includes an additional \$17,580,000 issued for students now eligible for P-EBT in August and September, and a monthly estimate of \$52,740,000 for 600,000 students for January -June benefits.)
 - Estimated amount issued to school children in SNAP households = \$201,818,400
 - Estimated amount issued to school children in non-SNAP households = \$290,421,600
 - Estimated amount issued to non-school children under the age of 6 and in a SNAP household = \$210,778,920
- Estimated total number of children to receive benefits = - 802,000
 - Estimated Number of school children in SNAP households = 246,000
 - Estimated number of school children in non-SNAP households = 354,000
 - Estimated number of non-school children under the age of 6 and in a SNAP household = 202,000
- Estimated administrative funds for 10/1/20 through 9/30/21 = \$13,130,841
- Tentative PEBT issuance schedule for SNAP and Non-SNAP households = P-EBT benefits are to be issued on the same day for SNAP and Non-SNAP households. The benefit files for October and November benefits (and August and September benefits for students now eligible under the Continuing Appropriations Act) were sent to the EBT vendor on February 5, 2021. SNAP recipients will have access to the funds immediately after the file has processed. The non-SNAP cases will be generated a new card. The card vendor is limited to printing a certain number of cards per day. We anticipate children having their card in hand by mid-February. After this first issuance, benefits will be issued on a monthly basis. The first issuance of benefits for non-school children under the age of 6 and in a SNAP household is planned to be issued by the end of March, and will include benefits for October, November, December, and January. This is the planned date if the P-EBT plan amendment is approved and the Conduent change order is finalized before the last week of March. Otherwise, it will have to be issued in early April. After the initial issuance, benefits for school children and non-school children under the age of 6 and in a SNAP household will follow the same cadence. The planned schedule is:

	February	March	April	May	June	July	August	September
Benefit Issuance Schedule	Issued October and November (and any Aug/Sept)	Issue January benefits (and corrections) by end of month	Issue February benefits (and corrections) for school age	Issue March benefits (and corrections) for school age	Issue April benefits (and corrections) for school age children	Issue May benefits (and corrections) for school age children	Issue June benefits (and corrections) for school age children	Issue corrections for school age children and non-school

		benefits on 2/5/21 Issue December benefits (and corrections) by end of month	Benefits for non-school children under the age of 6 and in a SNAP household October, November, December and January by end of the month.	children and non-school children under the age of 6 and in a SNAP household by end of month	children and non-school children under the age of 6 and in a SNAP household by end of month	and non-school children under the age of 6 and in a SNAP household by end of month	and non-school children under the age of 6 and in a SNAP household by end of month	and non-school children under the age of 6 and in a SNAP household by end of month	children under the age of 6 and in a SNAP household by end of the month	
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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.

Response: [please use as much space as needed]

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 (beginning with the issuances in March).
- 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 (e.g., virtual academies) or have students that have had to quarantine due to COVID for at least 5 consecutive days and are engaged in remote learning. 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 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. 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 other month the schools and school districts will have to submit student data for the *previous two months*. 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.

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.

- How will the State confirm that the child’s school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State’s plan for monitoring changes in eligible school status between the State’s bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

Schools and school districts will submit their student data every other 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. 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 for 5 consecutive days due COVID-19 (e.g. student is sick or quarantined). 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 will have eligible students if the 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.

Schools will submit their student data no later than the following dates:

		February	March	April	May	June	July	August	September
Data Submission Schedule		Data for Oct, Nov, Dec (and Aug and	Data for Jan, Feb by 3/11	Corrections submitted by schools	Data for March, April by 5/13	Corrections submitted by schools	Data for May and June by 7/8	Corrections submitted by schools	Corrections submitted by schools by 9/9

		Sept for newly eligible schools) by 2/2		(if any) by 4/8		(if any) by 6/10		(if any) by 8/12	
		Corrections submitted by schools (if any) by 2/23							

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?

- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child’s eligibility? Specifically, how will the State determine that:
 - the child’s child care facility is closed or is operating with reduced attendance or hours, or
 - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

For purposes of P-EBT, Ohio considers all SNAP children under the age of 6 to be enrolled in a child care. There is no State order limiting the number of children in a child care program due to COVID-19 (licensing requirements still apply around ratio) in Ohio. Any limits in ratio would be a voluntary reduction by a child care facility.

For the “area of the child’s residence” Ohio will use the county where at least one school is closed or operating with reduced hours of attendance. Ohio has 88 counties but has 610 traditional school districts, 279 charter schools, 49 Joint Vocational School Districts, and 51 Educational Service Centers. Additionally, the 610 traditional districts are broken up into city districts, local districts, exempted village districts, island districts, and one shared district that crosses state lines. Moreover, Ohio’s SNAP statewide automated eligibility system only captures the county of residence for a child, but not the school district or the child care center a child may be enrolled in. However, the county(s) where a school district is located can be easily identified. Not only is using the county as the “area” an administrative necessity, it is a more encompassing geographic area of where families can find available child care since not all children are enrolled in a child care center that is located within their school district.

Ohio proposes using a simplifying assumption for the benefit amount. Ohio will use a statewide average number of days P-EBT was issued in the month for school children. As stated above, the school districts information is not captured in the SNAP statewide automated eligibility system. However, the statewide average number of P-EBT days in a month is already available through the data received from school districts for school-age children and creates no additional administrative work. Furthermore, the burden on the P-

EBT call center will be eased by being able to answer questions about P-EBT benefits for non-school children under the age of 6 and in a SNAP household by having only one amount per month rather than varying amounts for each child that would have to be researched. This reduces the amount of time the representatives are on each call, thus reducing the number of additional call center representatives that would otherwise be needed.

In order to determine eligibility and issue benefits, ODJFS will create a monthly file that includes the entire population of SNAP children under the age of 6 (which will include the county of residence) and send the file to Management Council. Management Council will compile a list of counties that have at least one school district with students qualifying for P-EBT due to fully remote or reduced hours or attendance. Management Council will then compare the SNAP child's county to its list of counties with a P-EBT eligible school and its P-EBT student reported data. If a child resides in one of those counties and has not already received benefits as a school student (e.g. 5 year old not in kindergarten), the child will be eligible for P-EBT. Management Council will then send ODJFS the list of SNAP students eligible for P-EBT, and ODJFS will send the file to the P-EBT vendor for benefits to be added to the SNAP account. Furthermore, a child's eligibility will coincide with any changes a school may make in how it is operating. The data for school districts is submitted every other month for the *previous two months*. Management Council will update its county list based on this data, then compare the non-school children under the age of 6 and in a SNAP household against this list. Issuing benefits retroactively, rather than prospectively, ensures any change in how schools are operating is accounted for before issuing benefits. In October 2020- January 2021, all 88 counties had a least one school district providing remote education or operating at reduced attendance or hours, thus making all SNAP non-school age children in child care eligible for P-EBT. Ohio anticipates every county will have at least one school district that is operating at a reduced attendance from March-June 2021 due to the option for students to learn remotely while all other children return to in-person education.

If the plan amendment is approved and the Conduent change order is finalized before the last week of March, the first benefit issuance for non-school children under the age of 6 and in a SNAP household will occur at the end of March. Otherwise, the benefits will be issued in early April. This first benefit issuance will include benefits for October, November, December and January. Then the benefits will be issued monthly in accordance with the schedule for school children listed above (i.e. February benefits issued at the end of April, March benefits issued in May, etc.).

It is expected that the SNAP statewide automated eligibility system should issue an approval notice for benefits issued at the end of March, but no later than the issuance in April. If Ohio cannot issue approval notices for the first issuance, robocalls will be used to notify families of the P-EBT benefit amounts for each child.

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]

In September 2020, benefits for August and September were issued for students that met the criteria under the Families First Coronavirus Response Act (FFCRA). Each student received \$5.86 per day they were not in school.

With this amendment, Ohio will provide **\$6.82** 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). This will include issuing benefits for August and September to students who now qualify under the Continuing Appropriations Act. Ohio will not be using any simplifying assumptions.

For non-school children under the age of 6 and in a SNAP household, Ohio will use a simplifying assumption of the average number of days P-EBT is issued in the month for the state. For each day, the child will receive \$6.82.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

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

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.

- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

On 12/4/20 and 12/14/20 eligible schools and school districts were notified that the Continuing Appropriations Act authorized P-EBT for the remainder of the school year and were urged to begin taking NSLP applications for new students if they had not already done so. In an effort to reduce the number of cards returned to the EBT vendor, additional communications will urge families to update their addresses on file with the school.

Ohio plans to collect student data from the schools and school districts every other month and issue benefits retroactively. The first round of benefits to be issued in January will be for two or more months of benefits (October, November, and August and September for any newly eligible students). After the first issuance in January, benefits will be issued monthly based on data from two months in the past. The timeline for the first issuance is:

- Within 3 days of FNS approval of Ohio’s plan, a communication from ODE to the schools and school districts explaining the P-EBT eligibility criteria and the data submission procedures.
- By January 21, 2020, school districts will be required to submit their student data for October, November and December and August and September data for newly eligible students as well (i.e. hybrid schools that were not eligible under FFCRA).
- Management Council will submit, to ODJFS, one file of all student data within 5 days of the data submission by schools. This file will only include data for October and November benefits, and August and September benefits for newly eligible students.
- Once ODJFS receives the file from Management Council, it will send a file to Conduent with children who can be matched to a current SNAP household, and a separate file of all children who will receive benefits on a P-EBT card. The files will be sent on January 29, 2021.
- December benefits will be issued by the end of February.

Timeline for data submission and benefit issuance through September 30, 2021:

	January	February	March	April	May	June	July	August	September
Data Submission Schedule	Data for Oct, Nov, Dec (and Aug and Sept for newly eligible schools) by 1/21	Corrections submitted by schools (if any) by 2/12	Data for Jan, Feb by 3/12	Corrections submitted by schools (if any) by 4/9	Data for March, April by 5/14	Corrections submitted by schools (if any) by 6/11	Data for May and June by 7/9	Corrections submitted by schools (if any) by 8/13	Corrections submitted by schools by 9/10
Benefit Issuance Schedule	Issue October and November (and any Aug/Sept) benefits by 1/29/21	Issue December benefits (and corrections) by end of month	Issue January benefits (and corrections) by end of month	Issue February benefits (and corrections) by end of month	Issue March benefits (and corrections) by end of month	Issue April benefits (and corrections) by end of month	Issue May benefits (and corrections) by end of month	Issue June benefits (and corrections) by end of month	Issue corrections by end of the month

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 a P-EBT card. Families were not told to keep the P-EBT card with previous issuances, therefore new P-EBT cards will be issued in January and the card mailer will tell families to keep the card for any future benefits. After that new card issuance, any replacement cards ordered by the family will also be the P-EBT card. Communications to families about the P-EBT program and eligibility will tell them to keep the new cards. After January, any newly eligible students will receive a new P-EBT card with their first benefit issuance.

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 the date the benefit file is processed by Ohio's EBT vendor, Conduent. 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 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.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe 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 Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card

- Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
- Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

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. On 12/4/20, ODE notified all schools and school districts of the upcoming P-EBT program for the remainder of the school year and urged the districts to encourage families to submit NSLP applications and updated addresses.

ODJFS is implementing 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. The system functionality is expected to be operational in February 2021. 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 September 2021. This was originally operated by ODJFS, but as of December 2020 Management Council manages all customer service calls. Management Council is best situated to research benefit issues and make contact with the schools, therefore, 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 is adding additional customer service agents to assist with anticipated increased call volume upon the addition of P-EBT benefits to non-school children under the age of 6 and in a SNAP household.** 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.

If a family needs a replacement card, they 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.

Response: [please use as much space as needed]

Management Council will log and track over-issuances reported by schools and school districts or by individuals who call the customer service line. Ohio will work with FNS regarding procedures for overpayments should any be reported or identified.

Ohio has the ability to create a "shell case" within its SNAP automated eligibility system in order to establish an overpayment. The "shell case" does not require a current or past SNAP case in order to create the overpayment and collects on the claim through direct payment.

10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school 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:

Betsy Suver Betsy Suver, SNAP Director

Signature
Print Name and Title

Brigette Hires
Brigette Hires, Child Nutrition Program Manager

Signature
Print Name and Title

Date of Request: 3/17/21