

**State Plan for Pandemic EBT: Children in School  
School Year 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, School Year 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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<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>

**State Plan for Pandemic EBT: Children in School**  
**School Year 2020-2021**

1. **State:** Pennsylvania

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

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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment.
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment’s date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- 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

**Response:**

a. This plan will cover July 1, 2020 through June 30, 2021, not to exceed 180 school days.

b. P-EBT Benefit Amounts

Monthly P-EBT	Total P-EBT	SNAP Households	Non-SNAP Households
\$83,706,325.40	\$1,004,475,904.74	\$393,754,357.26	\$610,721,547.48

c. Estimated number of children who will receive P-EBT

SNAP Households	Non-SNAP Households	Total Children
363,794	564,252	928,046

d. Estimated administrative funds required: \$17,750,000 – This total includes funds for necessary system, contract, and staffing changes at the Pennsylvania Department of Human Services (DHS).

e. P-EBT benefits will be issued to both SNAP households and non-SNAP households on the same days. Based on the state’s experience with the Spring 2020 issuance, there is no significant benefit to splitting the children between SNAP households and non-SNAP households and in fact doing so created more confusion and frustration for P-EBT families as

some parents who had been receiving SNAP thought they were in the SNAP group and parents who were not on SNAP were frustrated that they were not given priority since they had not received assistance and the SNAP families were already getting some food assistance. Pennsylvania is proposing to collect data from the schools in two stages: 1) data collection for September 2020 through February 2021; and 2) data collection for March 2021 through May 2021. Pennsylvania is proposing to issue benefits in three stages. This schedule accounts for the school year being 180 school days between July 1, 2020 and June 30, 2021. Pennsylvania proposes using a simplifying assumption that each month from September 2020 through May 2021 has 20 school days. Pennsylvania's planned issuance schedule is as follows:

- i. Stage One – Eligible children for the period of September 1, 2020 through November 30, 2020. While Pennsylvania is already communicating with schools regarding additional P-EBT and schools have started putting data together, the first stage will be issued approximately six weeks after Pennsylvania receives FNS approval. These six weeks will allow up to four weeks for the Intermediate Unit (IU) to work with schools to finalize and submit their lists for the first stage and two weeks for preparing the files for transmission to the EBT vendor. The issuance will be spread across a maximum of 10 days but may be less depending on the quantity of children, with approximately 100,000 children sent per day.
- ii. Stage Two – Eligible children for the period of December 1, 2020 through February 28, 2021. The second stage will be issued in early June using information provided as a part of the data collection for Stage One. The issuance will be spread across a maximum of 10 days but may be less depending on the quantity of children, with approximately 100,000 children sent per day.
- iii. Stage Two – Eligible children for the period of March 1, 2021 through May 31, 2021. The third stage will be issued in mid-July to allow schools the month of June to report all eligible children and two weeks for preparing the files for transmission to our EBT vendor. The issuance will be spread across a maximum of 10 days but may be less depending on the quantity of children, with approximately 100,000 children sent per day.
  - i. Because many schools in Pennsylvania did not begin reviewing eligibility for the National School Lunch Program (NSLP) for the current school year until recently instructed, Pennsylvania recommends any child determined eligible for free or reduced price meals through NSLP at any point in the school year be treated as eligible for P-EBT for the entire period during which the child was enrolled at the school.

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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.

<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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue 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).

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

#### **Identifying Eligible School Children**

DHS will identify eligible students using a data collection process coordinated with the assistance of the Central Susquehanna Intermediate Unit (IU 16). IU 16 is one of 29 intermediate units in Pennsylvania that assist schools and the state with coordinating instructional development and providing technical and administrative assistance.

IU 16 will be responsible for obtaining a data spreadsheet from each school, both public and

non-public, for Stage One and Stage Two concurrently and Stage Three. For each stage, the spreadsheet will contain all currently enrolled students and will indicate whether the child would have normally had access to meals through NSLP. The data collection will be coordinated through IU 16 and forwarded to DHS. Information to be collected from each participating school for each student includes the following: county; school or School Food Authority name; child's first and last name, date of birth, case and record (if applicable); primary contact's first and last name, mailing address, and, if available, the primary contact's phone number or email; eligibility for free/reduced price or paid meals during the 2020-2021 school year (SY). In addition, schools will report the month that students attended 100 percent of the days in person, 100 percent remote, or other. This spreadsheet will be compiled by each school or School Food Authority and submitted as one single file based on the two phases of the plan. Though slightly updated, this spreadsheet will be compatible with DHS's issuance process that was established as part of the initial P-EBT issuances covering March through June of 2020, meaning Pennsylvania can reuse our previous issuance process.

### **Determining Eligibility for Free or Reduced-Price Meals**

Pennsylvania understands that because of COVID, schools have not focused on applications for NSLP and that schools will solicit current school year applications from families that are not yet determined as eligible for free/reduced meals. However, Pennsylvania's plan will include providing benefits for students that were eligible for free/reduced-price meals in the 2019-20 SY but not determined eligible for the 2020-21 SY. The student must still be enrolled in a participating school to qualify. When the list is submitted for the schools, DHS' system contractor, Deloitte, will perform a cross match with the previously provided lists from the 2019-20 P-EBT issuance. Any children identified as eligible for NSLP during the 2020-21 SY or identified in the cross match as receiving P-EBT in the 2019-20 SY will be treated as eligible for P-EBT for the entire period they were enrolled in school for the 2020-21 SY.

- **SNAP students:** Each school receives information from DHS regarding all directly certified SNAP students. Each school will be responsible for putting the correct data in the spreadsheet regarding each student. Schools will provide the DHS case record if available. DHS will be able to verify this information, but schools will be primarily responsible for compiling data.
- **Non-SNAP students:** Schools will be responsible for providing data regarding NSLP applications processed in the 2020-21 SY and should compile it on the spreadsheet. Deloitte will cross check the records of enrolled students for the 2020-21 SY not indicated as free/reduced eligible to determine if they were eligible in the 2019-20 SY. If currently enrolled in a participating school, DHS will issue benefits based on instructional model simplified assumptions.
- **Public school students:** Each public school that participates in the NSLP will be responsible for providing the list containing all currently enrolled students.
- **Non-public school students:** Each non-public school that participates in the NSLP will be responsible for providing the list containing all currently enrolled students.
- **New students:** Schools will provide data on every student enrolled in the 2020-21 SY. Kindergarteners and transfer students will be captured in this data. Students who have graduated or otherwise unenrolled will not be included.
- **Students who become newly eligible:** The school will capture a child's eligibility for NSLP. Because the list for Stage Three will not be provided until the end of the school year, any students that became eligible after Stages One or Two were issued will be captured in Stage Three and receive the full amount for the period that they were enrolled at the school.

### **Determining Lack of Access to School Meals**

Due to the large number of school buildings in Pennsylvania and the very diverse and fluid instructional models being utilized, students will be categorized in one of three categories for each month (September 2020 through May 2021):

1. Attended 100 percent of the days for the respective month in person; or
2. Attended 100 percent of the days for the respective month virtually/remotely; or
3. Other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).

Pennsylvania schools have implemented blended instructional models in a variety of ways to meet their respective student and community needs. Examples include a set number of virtual days per week, having some grades attend in person while others are virtual, scheduling virtual days based on the first letter of the student's last name, having students attend every other week online, etc. Tracking benefits for hybrid/blended models at the school or district level is not feasible or practical because it is overly burdensome on the schools.

Pennsylvania proposes to use a simplified assumption that any student in a hybrid/blended instructional model (i.e., not 100 percent in person or 100 percent remote/virtual) will receive a benefit equal to 65 percent of the amount a fully virtual student would receive. Based on information available, most schools are using a hybrid/blended model in which students attend virtually for half to two-thirds of each month. Pennsylvania polled its schools and received over 300 responses from schools operating some form of blended model. The majority of reporting schools confirmed that their students were attending virtual classes at least 50 percent of the time (178 schools), with the vast majority (126) operating virtually three days per week. The remaining blended schools that responded indicated students were attending virtual classes less than 50 percent (119 schools) or could not accurately classify the number of days because of the blended model that they were operating (69 schools). Using these numbers, Pennsylvania is erring on the side of caution and proposing to issue benefits for students participating in blended instruction at a rate of 65 percent of the amount that a fully virtual student would receive. For example, Stage One (September 1, 2020 through January 31, 2021) will contain 100 school days. Students identified as fully virtual will receive benefits for 100 days. Students identified as fully in-person will not receive a benefit. Students who are neither fully virtual or fully in-person will be identified as blended/hybrid and will receive benefits for 65 days (or 65 percent). With each data submission, schools will attest the information being provided is true and accurate to the best of their ability. A template Excel file illustrating the benefit amount for virtual and blended schools is included with the state plan. In late April or early May, the Pennsylvania Department of Education (PDE) will poll the hybrid schools again to determine whether the 65 percent rate is still appropriate or should be adjusted before the final stage of benefits are issued in mid-July.

- **SNAP students:** Students will be categorized in one of three categories for each month from September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).
- **Non-SNAP students:** Students will be categorized in one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).

- **Public Schools:** Students will be categorized in one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).
- **Non-public Schools:** Students will be categorized in one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).

### **Updating In-Person and Virtual Schedules**

Schools will be responsible for categorizing students in one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended). Hybrid/blended model students will receive a benefit equal to 65 percent of the amount issued to fully virtual students. In late April or early May, PDE will poll the hybrid schools again to determine whether the 65 percent rate is still appropriate or should be adjusted before the final stage of benefits are issued in mid-July.

Schools will upload a new, complete spreadsheet containing the full data set as of the point in time of the data collection to the IU. The IU will review the uploaded spreadsheet to ensure data is entered correctly and will upload the file to Deloitte. Deloitte then will compare the new spreadsheets with data from prior collections to identify changes such as address, enrollment, eligibility, etc. and issue benefits accordingly.

### **Responsibilities of Participating Agencies**

- **Schools:**
  - Each individual school, whether public or non-public, will gather all necessary information about their enrolled students and submit it via a secure online portal to IU 16.
  - Schools will answer questions directed through the IU related to data submitted.
- **PDE:**
  - PDE will work with DHS and IU 16 to communicate expectations and dates to schools and conduct a webinar for school administrators explaining P-EBT, the data collection process, and schools' role in P-EBT.
  - PDE will assist DHS in developing messaging for P-EBT recipients/community at large to provide consistent, simplified, and transparent information about P-EBT.
  - PDE will work with IU 16 to establish appropriate messaging that schools may send to families regarding P-EBT, if any.
- **DHS:**
  - DHS will contract with and ensure IU 16 is working with schools to collect data via the approved methods.
  - DHS will work with Deloitte to ensure P-EBT benefits are issued as quickly and accurately as possible. DHS will receive data transmitted into secure data portal.
  - DHS will establish a secure data transmittal portal in order for data to be transmitted from the school to IU 16, and IU 16 to Deloitte.
  - In partnership with PDE, DHS will develop communication to the public to include

the P-EBT webpage on DHS' website as well as notices or letters to P-EBT recipients/families and will work with Deloitte and the state Department of General Services (DGS) to ensure these notices are mailed timely.

- These notices will include the Web Emergency Operations Center (WebEOC) and hotline information for all questions related to P-EBT.
- DHS will administer and oversee the WebEOC and hotline by which families can ask questions regarding their P-EBT benefits. DHS staff will be responsible for researching and answering any questions that are submitted via public-facing avenues and referred to DHS by IU 16 and PDE.
- DHS will provide a webinar to County Assistance Offices on P-EBT, so they are able to answer general questions about the program.
- **Deloitte (IT Contractor):**
  - Deloitte will process the data collected from each school through the appropriate software to modify the lists into a format that can be accepted by DHS's EBT vendor to issue P-EBT benefits. This includes comparing 2020-21 SY enrollment data to 2019-20 SY data received during the Spring 2020 P-EBT issuances to capture all eligible children.
  - Deloitte will provide a mailing file to Conduent so that households in need of a P-EBT card receive one.
  - Deloitte has also developed and will maintain a bot to assist DHS staff in researching issues by automatically searching the lists of eligible children and presenting all necessary information so that DHS staff does not manually have to search lists.
  - Deloitte will provide any necessary technical support to issue benefits.
- **Conduent (EBT Contractor):**
  - Conduent will receive the P-EBT issuance and mailing files from Deloitte and issue P-EBT cards accordingly.
  - Conduent will issue replacement cards as needed.
- **DGS:**
  - DGS will process and mail all notices to families.
- **Intermediate Unit:**
  - Using an Intergovernmental Agreement, DHS will contract with IU 16.
  - IU 16 will collect data from public and non-public schools within designated timeframes via a secure portal, reviewing data templates at a high level to ensure data fields are complete and that data appears reasonably accurate (first name in first name field, date of birth in correct format, etc.)
  - IU 16, in coordination with PDE and DHS, will communicate with schools about the P-EBT process and data collection.
  - IU 16 will answer questions from schools regarding completing data templates, communicate with schools when data templates are incomplete or appear problematic, transmit data via secure portal to Deloitte, track schools for data submission, issue stipends to schools, research inquiries from schools related to the data collection, and report results back to DHS.
  - IU 16 will maintain a call center to answer questions from schools related to data collection and general P-EBT information. This call center will be exclusively for schools and will not support calls from parents, guardians, or the general public.
  - IU 16 will research and respond to questions that DHS is unable to answer based on the information provided in the spreadsheets regarding student eligibility. IU 16 will reach out to schools as needed regarding specific students.



## 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]

### **Monitoring school status**

- Schools will report data based on Stage One and Stage Two concurrently and Stage Three in a separate data collection. They will attest to the accuracy of the information they are submitting.
- Schools will categorize students into one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended).
- Information will be collected on a formatted Excel spreadsheet that is compatible with DHS' current benefit issuance process. Schools will be required to submit their point in time spreadsheets at the end of each reporting period.
- Because the information is collected in a format compatible with DHS' current process, benefits will be issued to children using the most recent data uploaded to DHS from schools.

### **Simplifying assumptions:**

- As stated previously, students will be categorized in one of three categories for each month September through May: (1) attended 100 percent of the days for the respective month in person; (2) attended 100 percent of the days for the respective month virtually/remotely; or (3) other, a combination of in-person and virtual/remote (generally referred to as hybrid or blended). A simplified assumption will be applied to all students that fall into the hybrid/blended instructional model. Hybrid/blended model students will receive a benefit equal to 65 percent of the amount issued to fully virtual students. Many schools using a blended model have tailored their model to what best serves the students in their schools. There is no statewide blended model and with over 3,000 public and non-public school entities in Pennsylvania, the variations in blended models makes it impossible to accurately capture and issue benefits for blended schools based on each individual school's type of blended model. Based on information available, most schools are using a blended model in which students attend virtually for half to two-thirds of each month. Pennsylvania polled its schools and received over 300 responses from schools operating some form of blended model. The majority of reporting schools confirmed that their students were attending virtual classes at least 50 percent of the time (178 schools), with the vast majority (126) operating virtually three days per week. The remaining blended schools that responded indicated students attending virtual classes less than 50 percent (119 schools) or could not accurately classify the number of days because of the blended model that they were operating (69 schools). Using these numbers, Pennsylvania is erring on the side of caution and proposing to issue benefits for students enrolled in blended learning at a rate of 65 percent of the amount that a fully virtual student would receive. In late April or early May, PDE will poll the hybrid schools again to determine whether the 65 percent rate is still appropriate or should be adjusted before the final stage of benefits are issued in mid-July.
  - An average of 20 school days per month will be used throughout the issuance periods for students enrolled or disenrolled throughout the school year.
  - The P-EBT issuance period will be from September 1, 2020 through May 31, 2021. Since the school year is required to be 180 school days, this period provides 180 days when using the average of 20 school days per month. The eligibility period of July 1, 2020 to June 30, 2021 will capture all school start and end dates.

## 5. 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 and a lunch 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 <b>(NEW)</b>	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.

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]

- Pennsylvania will issue benefits based on the \$6.82 Daily Total provided by FNS. This benefit will be multiplied by the number of school days that the student is not in school, based on simplified assumptions. The school year is 180 school days, so a school that operates in full virtual mode throughout the entire school year would see its eligible students receive \$1227.60 in total benefits.
- In determining blended totals, a simplifying assumption is made that each student attended school virtually 65 percent of the month. Many schools using a blended model have tailored their model to what they believe will best serve the students in their school. There is no statewide blended model, and with over 3,000 schools in Pennsylvania, the variation in blended models makes it impossible to accurately capture and issue benefits based on each individual school's type of blended model. Based on available information, most schools are using a blended model in which students receive virtual instruction between half to two-thirds of each month. Pennsylvania polled its schools and received over 300 responses from schools operating some form of blended model. Most reporting schools confirmed that their students were attending virtual classes at least 50 percent of the time (178 schools), with the vast majority (126) operating virtually three days per week. The remaining blended schools that responded indicated students attended virtual classes less than 50 percent (119 schools) or could not accurately classify the number of days because of the blended model that they were

operating (69 schools). Using these numbers, Pennsylvania is erring on the side of caution and proposing to issue benefits for students receiving blended instruction at a rate of 65 percent of the amount that a fully virtual student would receive. In late April or early May, PDE will poll the hybrid schools again to determine whether the 65 percent rate is still appropriate or should be adjusted before the final stage of benefits are issued in mid-July.

- Pennsylvania will not issue any P-EBT benefits to students that were fully in person for the entire school year.
- Pennsylvania will make a simplifying assumption that each month of the school year consists of 20 school days for the purposes of issuing P-EBT. This assumption takes into consideration the large number of schools in Pennsylvania, the range of instructional models being used by schools statewide, varying school calendars (i.e., school start dates, school recognized holidays, in-service days) and other potential differences in days that a student may attend school, either virtually or in person. Since the school year is 180 school days, making a 20 day per month simplified assumption allows Pennsylvania to issue P-EBT benefits based on a total of nine months, from September 1, 2020 through May 31, 2021.

## 6. 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]

### Implementation Timeline

- IU 16 will coordinate with the schools to provide lists of eligible students for the Stages One and Two through the approved upload method within 30 days of State Plan approval.
- Within 17 days after all lists have been submitted, Stage One benefits will begin to be

issued.

- Stage One benefits will be issued over 10 days or less, depending on the number of files, with approximately 100,000 children per file.
- Within seven days of Stage One completion, a mailing file will be provided to DGS to send notices to eligible families.
- Stage Two benefits will begin to be issued on June 7, 2021.
- Stage Two benefits will be issued over 10 days or less, depending on the number of files, with approximately 100,000 children per file.
  - Because Stage Two benefits will be issued using the same data collected for Stage One, no notices will be necessary for Stage Two as no new students will be identified.
- IU 16 will coordinate with the schools to provide lists of eligible students for the Stage Three by June 30, 2021.
- Stage Three benefits will begin to be issued on July 19, 2021.
- Stage Three benefits will be issued over 10 days or less, depending on the size of the files and how many files can be sent to Conduent each day.
- Within seven days of Stage Three completion, a mailing file of any students not included in Stage One will be provided to DGS to send a notice to these newly eligible families. Households that received a notice in Stage One will not receive a notice in Stage Three.

### **Additional Information**

- If Pennsylvania can verify that the child is actively receiving SNAP or TANF benefits, the benefit will be issued to the household's regular EBT card. If Pennsylvania cannot verify the child as an active recipient, the benefit will be issued on a P-EBT card. The P-EBT card will be the same design that Pennsylvania used for the Spring 2020 issuance: a white P-EBT card that specifically states "Pennsylvania" on the front of the card.
- Pennsylvania created a separate FS99 code in Conduent's EBT system for P-EBT issuances. Pennsylvania will continue to use this existing code to distinguish P-EBT from any other SNAP or D-SNAP benefits.
- For Spring 2020, Pennsylvania designated P-EBT first on its draw/spend priority. This process will continue to be used for the 2020-2021 P-EBT issuances.
- Pennsylvania will permanently expunge benefits after nine months of inactivity to align with the new expungement time periods (nine months of inactivity result in permanent expungement) detailed in the most recent Farm Bill which must be in place by September 30, 2021.
- Returned cards will be returned to Conduent, which will capture the information and destroy the card. Conduent will provide reports to DHS of returned cards for potential outreach to determine correct addresses so that replacement cards can be mailed. Pennsylvania already has a process for parents to request a replacement card through the WebEOC or hotline and this process will continue to be available during the 2020-2021 P-EBT issuances.
- Pennsylvania will issue new P-EBT cards for this issuance.
  - If DHS can identify that the student is an active SNAP or TANF recipient, the benefit will be issued to the household's EBT card.
  - If DHS cannot identify the child as an activate SNAP or TANF recipient, or the file provided by the school district indicates a different parent has custody for purposes of NSLP, the P-EBT benefit will be issued to a P-EBT card.

## 7. 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 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]

### **Resolving Disputes**

- DHS will utilize a contact center comprised of DHS staff that will triage all voicemails received. The contact center will respond to basic inquiries. Anything they are unable to address will be entered into a WebEOC database launched by the Pennsylvania Emergency Management Agency (PEMA) in response to the original P-EBT issuances for the 2019-20 SY. DHS staff will be responsible for reviewing, resolving, and responding to all inquiries in the WebEOC database.
- IU 16 will research inquiries that arise and will contact schools as necessary to resolve questions related to submitted data, such as a student missing from the files or a student indicated as paid (no benefit on file), but the parent/guardian believes the student is eligible for free/reduced price meals.
- In any dispute regarding free/reduced eligibility, enrollment or instructional model, the school will be contacted via IU 16 to confirm data submitted.

### **Serving Households with Access Problems**

- Pennsylvania will continue to comply with civil rights requirements, including providing equal access to individuals with disabilities and individuals who are limited English proficient.
- Communication will be sent in English and Spanish and will include a tagline in Pennsylvania's other priority languages instructing households to contact the Statewide Customer Service Center to obtain translator services. These translator services will also be available to DHS staff responding to parent inquiries.
- Children experiencing homelessness, foster children, and children without social security numbers will be included on the lists from school districts, as will best known contact information. Schools will work with these families to collect needed information. Because some children do not have social security numbers and schools do not collect social security numbers, Pennsylvania took steps to ensure the P-EBT can be issued with the social security number, such as using the last four digits of the zip code for activating the P-EBT card.

### **Public Information Campaign**

- Pennsylvania will issue a press release and use social media to disseminate information regarding P-EBT.
- DHS, in consultation with PDE, will provide scripted information to schools if they are contacted with questions about issuances. This will include the WebEOC link and phone number to the contact center. DHS will disseminate information to students about this benefit and the eligibility requirements via a notice when each stage of benefits is issued.
- DHS and PDE will coordinate a webinar for interested school administrators to participate to receive information and ask questions about the 2020-21 P-EBT. Any questions will be captured and added to a Questions and Answers document that will be shared with all schools and county assistance offices.
- The DHS Staff Development team will provide a similar webinar to all County Assistance Office staff to ensure that everyone interacting with the public has the most accurate P-EBT



information.

**Information Provided Directly to Participants**

- DHS will issue a mailer to all households that will receive a P-EBT benefit. This mailer will include high-level information about P-EBT, including that the benefit is non-transferrable, that non-SNAP households who wish to decline the benefit may simply destroy the EBT card, and that benefits will be permanently expunged after nine months of inactivity. This mailer will include contact information such as DHS's P-EBT website and the WebEOC link and the contact center phone number. This mailer will be sent in English and Spanish and will include a tagline in Pennsylvania's other priority languages instructing households to contact the Statewide Customer Service Center to obtain translator services. This mailer will be sent when benefits are issued.
- Each P-EBT card that is issued will include the same detailed pamphlet that DHS sends with current EBT cards explaining what the EBT card is, where and how to use the EBT card, how to PIN the card, and what items are eligible.
- Each P-EBT card will include a buck slip reiterating some of the benefit information included in the mailer.

## **8. Over-issuance of P-EBT benefits**

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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]

- Pennsylvania will only issue benefits based on the data provided by the schools through IU 16. Regarding custody arrangements, if a household provides verification of full primary custody for the time period in question, benefits will be reissued and the originally issued benefits will be captured on a spreadsheet as an administrative overpayment.

## **9. 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.

## **10. 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.

## **11. 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.”

**12. 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.

**13. 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:**

*Elizabeth M. Tilahun*

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Elizabeth M. Tilahun  
Deputy Secretary, Office of Income Maintenance  
Department of Human Services

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Danielle Mariano  
Deputy Secretary, Office of Administration  
Pennsylvania Department of Education

**Date of Request:** March 1, 2021