

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School, School Year 2020-2021
Document ID:	
Z-RIN:	
Date of Issuance:	November 16, 2020
Replaces:	N/A
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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
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>

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

1. State: INDIANA
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*¹ 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.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

Response:

The State does commit to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan (or subsequent amendment).

- a. **The State is submitting our P-EBT to cover the period of FFY 2021 from October 2020 through September 2021. Estimates on number of students and amount of issuance will be updated and provided each quarter to FNS since the school and student status would be subject to significant change due to the PHE.**
- b. **We are not planning to issue separate benefits based on whether the student is currently receiving SNAP benefits. We plan to issue a new P-EBT card to each eligible student at the January 2021 issuance point and inform parents of the need to retain this card. Newly added students at each subsequent quarter of issuance will receive new cards.**

Given the understanding of the pandemic and its impacts on schools and students, we are anticipating that the first two issuances (quarters) will be a similar count due to availability of vaccinations and the promulgation approach in the Spring. In analysis of the student base and the targets of Indiana for vaccinations, we then are

anticipating that our count would go down by half in the third quarter. Further, see the attached, updated forecast details. Our preliminary estimate was based on September in-person versus virtual, which is the best data that Indiana has available. This data is from several months ago when many schools were attempting to have in-person attendance at schools. As a result of the COVID positive rate increasing dramatically in Indiana, a significant number of schools moved to hybrid and/or at-home versus earlier in the school year. Consequently, we cannot estimate more accurately than this count at this time. We hope to understand more clearly as we approach the date how close we are in our forecast. This is our forecast based on the evidence we have available to us now.

Indiana commits to providing on time reporting as required throughout the Federal Fiscal Year on actual issuance. We are committing to this not only to ensure that all stakeholders are aware of status, but also as a mechanism to immediately right-size our forecasts as soon as possible.

- c. As noted in b., we do not plan to issue separate benefits based on SNAP/non-SNAP households. The estimated number of school children to be issued P-EBT benefits for quarter October 2020 – December 2020 will be: 209,753. We feel that this number of students would be the best available estimate for the remaining quarters of the FFY.
- d. Estimated amount of administrative funds the State needs to complete this work: Preliminary administrative costs will include development of template for completion by schools, technology staff costs, project manager, project management analysts and reporting which will total approximately \$563,207 for the FFY. Conduent has just provided the State with their change order for EBT cost projection to cover the FFY and this is currently under review.
- e. Proposed P-EBT issuance schedule: we plan to issue benefits over the last 5 days of the month in which the information is collected from schools for the previous quarter. Our plan is to provide schools a two-week period to report student information each quarter. For example, we will provide schools a two-week timeline in January 2021 projected to be January 4th – January 15th in which to report information. As information is submitted by schools, our data warehouse will load files in the appropriate format for transmission to Conduent EBT. On January 24th, the transmission of quarter October 2020 – December 2020 would be completed with Conduent. We would determine if issuance would need to be made over a period of 5 days based on that quarter's volume. Card issuance would then proceed once issuance is completed. This schedule would be projected at this time to re-occur in the months of April (for January 2021 – March 2021), July (for April 2021 – June 2021) and in September (for July 2021 – September 2021). For the last quarter of FFY 2021, we would have to allow schools to project student attendance for at least part of September in order that the funds were expended in FFY 2021.

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.

² 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.
We will require schools to attest up-front to their eligibility based on the period of closure or reduced attendance or hours must meet the minimum 5 consecutive day threshold this school year. Once this attestation is met, the school will be permitted to report student level data. As well, the schools and DOE are responsible for determining free/reduced lunch eligibility so if a student is added, we will assume that this eligibility covers the time period of October 2020 – December 2020. Reporting will be for restricted to school year 2020-2021, specifically the quarter from October 2020 – December 2020 for this first quarterly issuance.
- 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.
The schools will be provided with the parameters for determining student eligibility for P-EBT. Schools will be provided with a webinar training which will define school eligible requirements as well as student eligibility for NSLP and how to arrive at countable student days. Eligibility will be determined based upon the child receiving free or reduced price school meals under the NSLP and SBP if not for the COVID health emergency including those directly certified or certified by application and CEP schools or those operating under

Provisions 2 or 3 and 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.

- 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.

This will be determined based on the schools’ attestation that students did not have access to meals at school. This same procedure would apply regardless of public or 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.).

Eligibility and issuance of benefits will occur on a quarterly basis.

- 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).

FSSA/DFR will be responsible for the communications and overall processing of P-EBT benefits. We will work with DOE to determine the most up to date contact information for all schools. Schools will be sent communications on how to determine student eligibility, calculation of days and submission protocol. We will also work with DOE on the determination of free/reduced status of students since that determination may have been paused due to SFSP being available for this first semester.

Response: [please use as much space as needed]

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.
Webinar training for school administration on program overview and specific eligibility requirements.
Webinar training to school staff specifically responsible for data entry of student level information.
Data collection methodology will include edits and safeguards such as DOB field not allowing anyone over the age of 22, student ID will include character limits and edits, limit on allowable days that can be entered, verification of file receipt and acceptance, and how to contact the State if errors are identified after transmission.
- 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?
The State will require all schools who wish to report student information to first attest to meeting the above noted requirements.
- 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.).
School reporting of student eligibility will occur on a quarterly basis throughout school year 2020-2021.
- 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.
See previous response above.
- 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.
The State will not be using any simplified assumptions particularly since we will be determining eligibility retrospectively.

Response: [please use as much space as needed]

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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

The State will not be using any simplified assumptions particularly since we will be determining eligibility retrospectively. Student P-EBT amount will be equal to the value of the daily allotment for breakfast and lunch multiplied by the number of school days in the specified quarter where the students were not physically in-person at school, for each eligible child in the household. The value of the school meals is equal to the Federal reimbursement rate for breakfast and lunch at the free rate, which is \$5.86, as specified by USDA. School corporations will have to provide the details on days whether the student is not present due to the COVID-19 protocol. For those schools who have been in virtual instruction the entire time or in a hybrid setting, the schools will be required to provide the number of days in virtual learning for the specified quarter.

Response: [please use as much space as needed]

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 State’s plan has been developed cooperatively with our Department of Education as well as with Conduent EBT. We have informed Conduent of our issuance plan being on a quarterly basis and that parents will be informed to retain their P-EBT card from the January issuance in case their child(ren) continue to remain eligible for P-EBT in future quarterly issuances. Conduent has requested to be provided with a copy of this plan and it will be provided once finalized.

- 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.

Tentative P-EBT issuance schedule: we plan to issue benefits over the last 5 days of the month in which the information is collected from schools for the previous quarter. Our plan is to provide schools a two-week period to report student information each quarter. For example, we will provide schools a two-week timeline in January 2021 projected to be January 4th – January 15th in which to report information. As information is submitted by schools, our data warehouse will load files in the appropriate format for transmission to Conduent EBT. On January 24th, the transmission of quarter October 2020 – December 2020 would be completed with Conduent. We would determine if issuance would need to be made over a period of 5 days based on that quarter’s volume. Card issuance would then proceed once issuance is completed. This schedule would be projected at this time to re-occur in the months of April (for January 2021 – March 2021), July (for April 2021 – June 2021) and in September (for July 2021 – September 2021).

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?
The State will use the same card design that we used for our previous two P-EBT issuances which was the unique P-EBT card for Indiana. Cards will be sent to each eligible student.
- 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.

The State will continue to use our sub-benefit type as was used previously which would be separate and apart from D-SNAP.

- 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.

The State will follow the same expungement rules as 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?

P-EBT cards will be returned to Conduent EBT. Parents will be informed of card replacement procedures.

- 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?

Each student eligible at January issuance will receive a new P-EBT card. The parents of each student will be informed to retain this card in case eligible for future P-EBT eligibility. Newly identified students at each quarterly issuance would receive a new P-EBT card.
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

If the P-EBT household no longer has their card from previous P-EBT issuance, they will be informed of how to request a replacement card.

Response: [please use as much space as needed]

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.

The State will have an e-mail box established for taking such inquiries. Disputes over amount of benefits can be addressed with schools and the schools will have an opportunity to correct previous quarter issuances at next quarterly issuance cycle.

- 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.

For limited English proficiency, we do have immediate capabilities to translate any information as needed. For homeless children, we will work with schools to ensure that there is a mailing address by which to provide benefits and as well someone at the school to assist in getting the benefits to the student. For foster children, we will communicate with our Department of Child Services to inform of this next issuance and to advise that foster parents update their addresses with their respective schools. Those without a SSN should not be a problem since that is not included in the data being collected nor is it necessary to pin the card.

- 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).

The State will release a statewide media statement concerning the continuation of P-EBT benefits for this coming FFY. The State P-EBT website will be updated at least quarterly with a list of schools who submitted student data, FAQs, and communication with parents on school/student eligibility.

We will continue to post an address correction form on our website for parents to provide an updated address should the address in school file no longer be correct. This is subsequent to each issuance and a replacement card will then be mailed to this new address.

- 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)

The buckslip information sent out with the P-EBT card will contain most of the information noted above. As well, the buckslip will contain reference to our P-EBT website for more information on the program. The buckslip is included as part of this plan submission for reference and will be posted on our P-EBT website.

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?

Information will be provided via the buckslip sent with the P-EBT card as well as on our P-EBT website.

- 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?

We will have to rely primarily on communication with all schools, social media and our website for information concerning P-EBT.

Response: [please use as much space as needed]

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.

The State confirms that we will not attempt to reclaim P-EBT benefits by reducing a household's SNAP benefit. Since P-EBT benefits are unsolicited benefits to many of the families receiving, the State does recognize that efforts must be taken to communicate and attempt to rectify questions and concerns. The State will research cases that come to our attention where perhaps custody recently changed such as to a guardian or custodial parent status changes. In these situations, if the benefit has already been spent, there is no further recourse available. If the benefit has not been spent, we are able to re-issue a P-EBT card for the student.

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]

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 State Agency Official:

Adrienne M. Shields **Date: 12/10/2020**

Signature
Adrienne Shields, Director
FSSA/Division of Family Resources