

**State Plan for Pandemic EBT
Children in School, Summer 2023**

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Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 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), the Consolidated Appropriations Act, 2021 (P.L. 116-260), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328)

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

The submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

**State Plan for Pandemic EBT
Children in School, Summer 2023¹**

1. State: California

2. Primary Citation: Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

- a. Estimated total amount of P-EBT benefits the state will issue within this amendment's date range. (Consult the appropriate table in Section 4, "Benefit Levels.")
 - Estimated amount issued to school children: **\$480,000,000**
- b. Estimated total number of school children to which the state will issue P-EBT benefits.
 - Estimated number of school children: **4,000,000**
- c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.
 - School children: **June – August 2023**
- Names of state agencies involved in administering this plan:

The California Department of Education (CDE), in collaboration with county offices of education, local school districts, public schools, non-public schools, and private schools, is responsible for determining P-EBT eligibility for school children.

The California Department of Social Services (CDSS) is responsible for issuing P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, and the provision of customer service and support.

¹ Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - School children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023, or school children who are determined newly eligible for free or reduced-price meals.
- Describe how the state will ensure that households with school children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

Response:

California will use data from the Operational Data Store (ODS) of the California Longitudinal Pupil Achievement Data System (CALPADS) to identify students eligible for 2022-23 summer P-EBT benefits. Specifically, California will identify school-age students whose last enrollment in SY 22-23 was for one or more days in May 2023, at:

- A school participating in the National School Lunch Program or School Breakfast Program (SBP) that was operating under the Community Eligibility Provision, or Provision 2 or 3, OR
- A school participating in the NSLP or SBP but not operating under a provision, and the student was P-EBT eligible based on being one of the following in SY 22-23: being free-reduced price meal eligible via application or alternative income form, homeless, foster, migrant, or direct certification.

School children who exited school or graduated early, transferred to a school not participating in SBP or NSLP, or who transferred out of state, will not be issued summer P-EBT benefits. The CDE encourages school districts to accept NSLP applications year-round. For SY 22-23 P-EBT, April 30, 2023 will serve as the final NSLP application deadline to determine summer P-EBT eligibility given the deadline to issue P-EBT benefits before September 30, 2023. The CDE will notify schools of the NSLP meal application deadline for summer P-EBT benefits. California will issue summer P-EBT benefits to school children identified as eligible as of June 1, 2023. On June 1, 2023,

CDE will extract information from CALPADS to identify school children determined eligible for summer P-EBT. This timeline provides schools the month of May 2023 to complete the processing of NSLP applications received and enter relevant information into CALPADS before the CDE pulls the information from the system to determine summer P-EBT eligibility. California will not issue summer 2023 P-EBT benefits to school children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

5. Benefit Levels

Summer 2023 P-EBT Benefit

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 2023 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 past years, 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.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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 P-EBT issuances for previous school years. 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.
- 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:

Implementation Timeline

The feasibility of this timeline depends on the date of plan approval. The State may need to change the issuance schedule depending on when the plan is approved. The tentative timeline is as follows:

Post-Plan Approval

- June 1 to June 30, 2023: P-EBT eligible list for SY 22-23 finalized.
- July 1 to July 15, 2023: P-EBT data prepped for and transferred to EBT vendor.
- July 16 to August 30, 2023: P-EBT card mailing for benefit months June through August 2023.

EBT Processing & Benefit Issuance

California will issue P-EBT benefits on dedicated P-EBT cards for all P-EBT recipients. All school children, including those previously issued a P-EBT card and those that are newly eligible, will receive benefits on a newly issued card. The newly issued P-EBT card will be distinguishable as a "P-EBT 4.0" card. All P-EBT cards will be issued in the name of the eligible child and each child will receive their own P-EBT card.

P-EBT cards will be mailed to the mailing address maintained in CALPADS. Undeliverable cards will be deactivated by the EBT vendor. Families may contact the P-EBT Helpline to request that a new card be mailed to the correct address. All requests for replacement cards will also be handled by the P-EBT Helpline. California will establish a deadline of September 15, 2023 for replacement card requests to allow time for appropriate winding down of the program before the September 30, 2023 deadline. Expanded P-EBT Helpline

capacity will ensure that address change and card replacement requests can be processed timely.

P-EBT benefits will be distinguished from regular SNAP benefits via the use of a dedicated P-EBT benefit type. Because P-EBT benefits will be issued via a dedicated card and benefit type, there will be no draw/spend relationship between P-EBT, SNAP benefits, and Disaster SNAP benefits.

P-EBT benefits will be subject to an expungement rule of 365 days. This allows families that may not be initially aware of their eligibility for P-EBT 4.0 to receive and use their P-EBT benefits. P-EBT cards will not become dormant at 180 days. This exception is warranted because P-EBT families will not be issued a dormancy notice. Removing dormancy balances the need for client access and the administrative burden associated with requests for card reactivation processed by the P-EBT Helpline.

7. Customer Service

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- 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 and caregivers 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 to 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 over the past year, 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:

Client Education and Communications Campaign

California will take a multi-faceted approach to ensuring robust and accurate communication to all eligible households by launching a public information campaign through the length of the State’s P-EBT operation to reach both the general public and P-EBT eligible families directly.

General communications strategies will include a dedicated P-EBT website and wide range of media, as well as resources for partners including schools and community-based organizations to engage in client education. Resources include flyers, fact sheets, communication templates, and informational videos. The P-EBT website and materials will be available in multiple languages (including English, Spanish, Vietnamese, Mandarin, Arabic, Cantonese, Tagalog, Korean, Punjabi, Russian, Farsi, and Armenian), reflecting the primary languages spoken at home by the California student population; and the corresponding media strategies will also be multilingual. The website will be Americans with Disabilities Act (ADA) compliant. Paid media will include digital (connected TV, YouTube, Steaming Audio), paid search, and paid social media (Facebook, Instagram). Partner materials will include flyers, template text/email language and sample social media posts and graphics in multiple languages. These outreach materials will be shared broadly with stakeholders.

California will issue a direct mail communication to P-EBT eligible families. P-EBT eligible families will receive a flyer that will provide general information and direct them to the P-EBT website for more information. The flyer will include an explanation of P-EBT, eligibility for the program, expungement rules, and updates on implementation and issuance timelines. The flyer will also note that summer P-EBT benefits will be \$120 for the summer period and that young children under age six are not eligible to receive summer P-EBT benefits.

A notice will also be sent with each P-EBT card and will include information about how to check balances, how to request a replacement card, how to use P-EBT benefits, where P-EBT can be used, who to contact for questions, and how to opt out if they do not want P-EBT benefits. The mailer will also include details on where to go for step-by-step instructions on how to PIN your P-EBT card. Families will also be advised that P-EBT benefits are non-transferable. The information notice will be available in English and Spanish and will be accompanied by language assistance information.

P-EBT Helpline

The P-EBT Helpline will serve as first line customer support. To support P-EBT eligible families, California has significantly expanded its P-EBT Helpline capacity. Tier I P-EBT Helpline agents will assist callers with general information, PIN set-up, address changes, and card replacements. The Tier II P-EBT Helpline will assist callers who were denied benefits, explaining P-EBT rules and conducting an additional search for the child in the P-EBT lookup system. CDSS will work directly with CDE to confirm information for school children who may have been missed in the initial eligibility collection.

Additionally, California will make available a live chat feature on its P-EBT website. The live chat feature will be an additional avenue for families to receive P-EBT customer service. The P-EBT Tier II helpline agents will staff the P-EBT Live Chat. Helpline agents will assist families through the live chat by providing answers to general P-EBT questions. This can include questions related to PIN setup, providing eligibility details, where and how to use the P-EBT card, etc.

The P-EBT Live Chat will also be utilized to issue card replacements or process address changes. For inquiries in the P-EBT Live Chat related to card replacements or address changes, the user will be asked to provide the child's name, date of birth, and current mailing address prior to entering the chat. For address changes, the new mailing address will also be requested. Once the user enters their verification information in the pre-engagement form, they will be admitted into a chat with a live P-EBT customer service agent to process the change request. Verification information will not appear in the chat box itself once the client has entered their information in the pre-engagement form. No personally identifying information will be exchanged through the chat box itself. All chat and pre-engagement form logs will be deleted after 30 days to provide sufficient time for quality assurance reviews.

Given the standard benefit amount of \$120, all school children eligible for summer P-EBT benefits will receive the same benefit amount, therefore no incorrect benefit amounts will be provided.

Accessibility

The CDSS is committed to equitable access for all eligible families regardless of their circumstances. To serve households with limited English proficiency, California's P-EBT plan includes access to information in languages other than English. To serve school children without a social security number (SSN), P-EBT PIN set-up does not require an SSN. To

serve households without internet access, California has included in this plan direct mail to P-EBT eligible families and has increased the P-EBT Helpline's capacity to provide general program information. To serve people with disabilities, P-EBT information will be provided in simple, direct and user-friendly language and the P-EBT website will be ADA compliant.

While P-EBT cards must be received by mail, California will offer options to assist families that may lack a permanent residence address. More specifically, P-EBT eligible families may request that their P-EBT card be sent to a residence or commercial address, P.O. Box address, or general delivery. County welfare departments and schools may also receive P-EBT cards on behalf of P-EBT eligible families experiencing homelessness.

8. 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.

Please describe how your state will manage P-EBT payment errors.

Response:

Due to the scale of California's P-EBT operation, California's plan proposes reducing the number of issuances. These measures will inherently eliminate the most common sources of issuance errors. Additionally, all P-EBT eligible school children will be assigned a unique identifier. This unique identifier will be used throughout the data match process to ensure individual school children are only issued P-EBT benefits once for each month the child is

determined P-EBT eligible. The unique identifier will be used by CDSS and California's EBT vendor to review P-EBT data for potential duplicates at various points in the data match and benefit issuance process. The State will ensure that school children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits.

Because P-EBT eligible families will receive P-EBT benefits without application and eligibility will be determined based on the State's own administrative data, individual children and families will not be held liable for any administrative over-issuance of P-EBT benefits. The State will contact USDA whenever it identifies an issuance error via the standardized over-issuance template provided by USDA. Further, the State will provide a description of the error, the number of children involved, the value of the over-issuance, and corrective actions taken or will be taken to prevent recurrence of the problem. The State may correct errors in P-EBT issuances in appropriate circumstances.

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. 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 10 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 by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

13. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:

Signature
[Print Name and Title]

Signature
[Kim Frinzell, Director Nutrition Services Division
California Department of Education]

Date of Request: _____

