

**State Plan for Pandemic EBT  
Children in School and Child Care, 2022-2023**

<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 and Child Care, 2022-2023
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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 children in schools or child care during school year (SY) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

*Additional context and background for this document can be found at State Guidance on Coronavirus P-EBT: [Click Here](#)*

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

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2022-2023**

1. **State:** Ohio

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

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this state plan or amendment
  - for children in school
  - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the state will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
  - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the state will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households
  - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
  - School children in SNAP households
  - School children in non-SNAP households
  - Children in child care
- e. Names of state agencies involved in administering this plan.

**Response:**

For children in school, this plan covers August 2022 through June 2023, or when the federal public health emergency (PHE) ends, whichever comes sooner. For all children under the age of 6, on SNAP, and not in school (hereinafter referred to as SNAP Under 6), and for virtual or homeschool children, this plan covers August 2022 through May 2023, or the month after the PHE ends, whichever comes sooner.

The following entities are involved in the administration of P-EBT:

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<sup>1</sup> The date range covered by P-EBT state plan or amendment. A state's plan will typically cover the instructional months in the state's school year (September 2022 through June 2023, for example).

- The Ohio Department of Job and Family Services (ODJFS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards (through its vendor), and providing notices to clients.
- The Ohio Department of Education (ODE), in collaboration with Management Council-Ohio Education Computer Network (Management Council) are responsible for communicating with local school districts about P-EBT eligibility criteria and data submission requirements. Local school districts and schools are responsible for identifying P-EBT eligible children and submitting data to Management Council. Management Council will compile all school data into one file on a monthly basis and send to ODJFS. Additionally, they will manage the customer service and support call center.

### Estimates

Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.

For school children, Ohio made estimates based on April 2022 P-EBT data for school children which shows 14,206 school students eligible for an average of 9 days per month.

- Estimated amount issued to school children in SNAP households = \$418,309 per month and \$4,601,397 for the school year
- Estimated amount issued to school children in non-SNAP households = \$627,537 per month and \$6,902,906 for the school year

Estimated total *number* of children to which the State will issue P-EBT benefits.

- Estimated number of school children in SNAP households = 5,682  
Estimated number of school children in non-SNAP households = 8,524

For children on SNAP under 6, based on CACFP data from May 2022, Ohio estimates an average of 5 days of P-EBT benefits per month. When multiplied by \$8.18 per day, the average monthly benefit per child is \$40.90. Benefits will be issued for August 2022 through May 2023, totaling 10 months. This means a child on SNAP under 6 from August 2022 to May 2023 could receive a total of \$409 for the school year. With an estimated 205,903 on SNAP under 6, this equates to an estimated monthly P-EBT issuance of \$8,421,432.70 and an estimated total P-EBT issuance for the school year of \$84,214,327.

Estimated total *number* of children on SNAP under 6 to which the State will issue P-EBT benefits is 205,903.

For virtual and homeschool children, Ohio estimates 10,000 children will be eligible. Ohio intends to assume eligibility from August to May (unless the federal public health emergency ends sooner) with 18 days of benefits per month equals \$1,472,400 per month, and \$14,724,000 for the school year.

### Issuance:

ODE will send notice to schools for student data collection to begin in December for the months of August-November 2022, and the message will also include due dates for the monthly data

collection for each month following. Management Council's online P-EBT application for virtual and homeschool students will be ready in November but will not be made available to the public until the P-EBT plan is approved. Once the P-EBT plan is approved by FNS:

- School students:
  - First issuance - Ohio will issue benefits at the end of the month the P-EBT plan is approved for any months that school student data has been submitted. This is contingent upon the plan being approved at least 10 days before the end of the month. If approved in the last 10 days of the month, the benefits may be issued in the following month.
  - Ongoing issuances - After the first benefit file for school students, P-EBT benefits will be issued the month following the month benefits are for. For example, P-EBT benefits for December will be issued by the end of January; benefits for January will be issued by the end of February.
  
- Virtual/homeschool students:
  - First issuance - Ohio will issue benefits at the end of the plan approval month for any applications that have been received and approved after plan approval and before the benefit file is processed. This is contingent upon the plan being approved at least 10 days before the end of the month. If approved in the last 10 days of the month, the benefits may be issued in the following month.
  - Ongoing - Any applications (virtual/homeschool) received in that month after the benefit file is processed will be put in the next month's benefit file.
  
- SNAP under 6:
  - First issuance – The earliest an August payment can be issued is in the month of December. If the P-EBT plan is approved and the August payment amount has been approved by FNS, the benefit will be issued by the end of December. If it cannot be issued in December, it will be issued in January.
  - Ongoing – the monthly benefit will be issued 3 months retroactively due to when CACFP data is available (90 days later). For example, October data will be available in January, therefore, benefits for October 2022 will be issued by the end of January 2023.

### **Benefit Availability**

At the request of Ohio's grocers, ODJFS staggers the availability date of the benefits. The availability date depends on the date the benefit file is sent to the EBT vendor, how many days are remaining in the month, and the first letter of the last name of the child. More specifically, from the date of the benefit file generation, Ohio will divide 26 (number of letters in the alphabet) by the number of days remaining in that month. Then the availability of benefits will be staggered on those remaining days by groups of letters in the alphabet. For example, in November if the benefit file is sent on 12/21, there will 10 days left in the month. 26 divided by 10 equals 2.6, rounded up to 3. Thus, the availability date for kids whose last name is starting with A, B, and C will be 12/21; availability date for D, E and F will be 12/22; availability date for G, H and I will be 12/23 and so on and so forth until the availability date for all alphabet letters (i.e. kids) is established. This process applies to all SNAP children under the age of 6 not in school. If for some reason benefit files get delayed beyond the end of the month, the benefit

will be combined with the next month's benefit and follow the staggered issuance process. This is the same process for school age children in receipt of P-EBT benefits.

#### 4. P-EBT for School Children (see Q&As #7-25)

##### A. Eligible Children

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###### *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 2021-2022, **or**
  - b. certified through submission of a household application processed by the child's school district for SY 2021-2022, **or**
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
  - d. on the school's most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application **and** the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.
- How will the state determine and/or confirm each child's eligibility for free or reduced-price meals?<sup>2</sup> 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.

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<sup>2</sup> The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g., which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the state will take to address program integrity when using the proposed simplifying assumptions. *(Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)*

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

### School Children

To identify eligible school children, Ohio will use data provided by eligible schools and school districts directly. Eligible schools or school districts include those that traditionally participate in the National School Lunch Program and have all students participating in fully remote learning, schools that have students in a hybrid learning scenario and schools with all students in attendance, but have students whose parents opted for fully remote learning due to COVID-19 (not virtual learning academies), or have students who do not attend school due to being sick with COVID-19 or have had to quarantine due to COVID-19. Since it is no longer a state policy to track a student’s absence due to COVID-19, each school will decide how it will determine if an absence is COVID-19 related. At a minimum, schools must allow parents to attest that certain days were COVID-related and the school will have to confirm that they were excused absences.

ODE will send a communication to all eligible schools and school districts explaining the eligibility criteria for P-EBT, and procedures for submitting eligible student data and number of eligible days. Schools are responsible for: verifying NSLP eligibility through the direct certification process, community eligibility provision or Provision 2, or the NSLP application process for school year 2022-2023; ensuring a meal was not received by the student at school (for both SNAP and non-SNAP recipients); and the number of days the child is eligible for P-EBT. Schools will be told that P-EBT eligible days cannot be any sooner than the eligibility for NSLP.

Management Council has developed a web service that enables each participating school or school district to submit verified and updated data for eligible students. Management Council securely hosts this data and make that data visible only to identified contacts at each school. Every month the schools and school districts will have to submit student data for the *previous month* with the exception being the first data collection month of November where schools will submit applicable

August, September and October 2022 data. Issuing benefits retrospectively removes the potential for schedule changes occurring before benefits are issued.

ODE will provide Management Council with a file of all participating schools and school districts in the NSLP, including CEP or Provision 2 status for buildings and districts, as well as any newly qualified or participating schools or school districts. Management Council will coordinate all activities with ODE and ODJFS, including file transfers, data collections, verification of NSLP participating schools, and data transfers. Management Council securely delivers to ODJFS data files via secure file transfer. Then ODJFS transfers the data file to the EBT vendor for card and benefit issuance, and the SNAP automated eligibility system issues an approval notice for each student.

### **Virtual and Homeschool Children**

For virtual and homeschool children, Ohio is creating a P-EBT application portal specifically for this population of students. Parents/caregivers will complete the online application that will ask for: student information; household income (along with requiring income verification); previous school district prior to enrolling in the virtual school or beginning homeschool (or the option that they have never been in the school because they are kindergarten through second grade); why the child began virtual school or homeschool, one of the selections will be “due to Covid concerns”; if they are in receipt of SNAP or Ohio Works First (OWF – Ohio’s TANF assistance program) , and if yes, ask for the case number; and the electronic signature will have an attestation that the information is correct. The application will have a drop down of all school districts/schools that have been operating the NSLP program. Any students that switch from in-person learning to virtual or homeschool in the 2022-2023 school year after the date Ohio’s plan is approved by FNS are not eligible for this benefit. The application will provide parents with the ability to upload income verifications. It will also have a statement that parents must notify Management Council if and when their child leaves his/her homeschool or virtual school during the school year to enroll in an NSLP school. Lastly, Ohio has built in a program integrity check into the application system.

Once the application is submitted, the Management Council system will determine eligibility based on the number of people in the household and the monthly income (if the applicant indicates they are not in receipt of SNAP or OWF). If ineligible based on income and household size or select a reason for leaving the NSLP school that is not “due to COVID concerns”, the parent will receive an email indicating that they do not meet the required guidelines for eligibility. They will be provided a support email that they can contact if they feel the determination is in error. If the student is eligible based on income and household size, the parent will receive an email indicating that the next step of the process is verifying the student’s prior enrollment and departure dates at the district/school indicated on the application.

Next, student information will be sent to the district indicated on the application for verification of prior enrollment through a portal designed by Management Council. Districts will go into the portal to indicate enrolled/not enrolled for each student. Students who are verified as being enrolled on or after January 27, 2020 will be processed to receive payment. If verified by the district/school, the student will be eligible for PEBT benefits from August 2022 through the end of the PHE or May 2023(whichever is first). When P-EBT payments are issued, an approval notice will be issued from the SNAP automated eligibility system. These students will not receive more than 180 days of benefits.

Students determined eligible in step 1 (income and COVID reason) and flagged as “not enrolled” will not be submitted for payment and the parent/caregiver will be notified via email that they were not verified as enrolled in the district prior to COVID and the student is not eligible for P-EBT.

As indicated above, the application will ask parents/caregivers to provide a SNAP or Ohio Works First (OWF – Ohio’s TANF assistance program) case number if applicable. If a SNAP or OWF case number is provided and the “due to COVID concerns” reasons is indicated, the student will be considered to be eligible and will be sent to the previous district for verification and to the virtual school or current school district where homeschool plan is on file for verification.

- If previous enrollment is not confirmed, the parent/caregiver will be notified via email that they were not verified as enrolled in the district prior to COVID and the student is not eligible for P-EBT.
- If current enrollment in virtual school is not confirmed, or homeschool plan is not on file with the school district, the parent/caregiver will be notified via email that the student is not eligible for this reason.
- If enrollment criteria is confirmed, Management Council will confirm SNAP or OWF eligibility with ODJFS. If SNAP or OWF eligibility is confirmed, P-EBT benefits will be issued and an approval notice will be issued from the SNAP automated eligibility system.
  - If SNAP or OWF eligibility cannot be confirmed, Management Council will determine if income eligibility is met based on information provided in the application. If income eligible, P-EBT benefits will be issued and an approval notice will be issued from the SNAP automated eligibility system.
    - If income ineligible, the parent/caregiver will be notified via email that they were not income eligible and the student is not eligible for P-EBT.
- The application will also ask a question for what school district is currently residing in to determine if the child is Community Eligibility Provision (CEP) eligible.

Ohio will have the virtual school (indicated on the application) verify the student is enrolled with the virtual school. For applicants who indicate their child is homeschooled, Ohio will also ask the school district the child resides in to verify a home school plan is on file for the child.

Ohio will make a simplifying assumption of 18 days per month for each eligible child beginning with August 2022 through the end of the PHE or May 2023, whichever comes first. . Ohio is using 18 days since federal law requires 180 days of instruction and the majority of Ohio’s schools have instruction in a 10-month period. If eligible, students will be eligible for P-EBT benefits from August 2022 through the end of the PHE or May 2023, whichever comes first. They will not receive more than 180 days of benefits.

Ohio is not updating plans for school years 2019-2020, 2020-2021 or 2021-2022 to issue benefits to this population of children. P-EBT benefits will only be for school year 2022-2023.

## **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 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]

Every month schools and school districts will submit their students for the previous month, which will include how many days each NSLP eligible student was not scheduled to attend in-person (or attend at reduced hours) and did not receive a meal at school. After the first issuance, benefits will be issued retroactively on a monthly basis. Issuing benefits retroactively, rather than prospectively, removes the need to ensure there are no changes in status before benefits are issued. No simplifying assumptions will be used.

In addition to the eligibility criteria described above, the following clarifications are based on FNS guidance:

- Students (who are eligible for free or reduced-price meals) will be eligible for P-EBT when they are absent from school due COVID-19 (e.g. student is sick or quarantined by the school's COVID quarantine criteria). Once eligible, the student will receive benefits for each day they are absent from school due to COVID-19, regardless if their attendance schedule is normally fully in-person or hybrid.
- Districts or schools operating fully in-person with an option for families to choose fully remote learning due to COVID-19 will have eligible students if a single student has opted into a fully remote learning for 5 consecutive days.

Eligible children will include Preschool (Pre-K) through 12<sup>th</sup> grade students within the eligible school buildings who are eligible for free or reduced-price meals through NSLP or SBP and did not receive a free or reduced-price meal to eat at school.

A quarantine day will be determined based on a school official directing a child to quarantine and remain home based on school quarantine criteria. Examples of a school's quarantine criteria includes: a child remaining at home because of exposure to another student who tested positive for COVID-19; the child has tested positive for COVID-19 and is not permitted to return to school; and a family member of the child has tested positive for COVID-19 and the child is not permitted to attend school. Quarantine days will not include families reporting a child is sick and is unrelated to COVID-19.

If a school has to tell a class of students to not attend school because their teacher is sick with COVID-19, these days will qualify as reduced attendance for P-EBT purposes. This would apply as well to days when the school tells children not to attend school because bus drivers are sick with COVID-19. Staff shortages due to being unable to fill positions do not qualify as COVID-19 related. For example, a school having to close school because they do not have enough bus drivers on staff to transport children would not be used in determining eligibility for P-EBT. However, bus drivers on staff who become sick due to COVID-19 and school had to be closed as a result would be used in determining P-EBT eligibility.

ODE is providing guidance to schools that a student must be enrolled in and attending a school that qualifies to participate in the National School Lunch Program and that school must be participating in the National School Lunch Program for school year 2022-2023 to qualify for P-EBT. Online Learning Schools/ Virtual Academies with no assigned/ affiliated physical school building do not

qualify for the National School Lunch Program and enrolled children will need to go through Ohio's P-EBT application process for virtual and homeschooled students.

## 5. P-EBT for Children in Child Care (see Q&As #26-33)

### *Standard for P-EBT Eligibility*

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

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

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44<sup>3</sup>. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children's eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- How will the state determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #30)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine those children's eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
  - the child's child care facility is closed or is operating with reduced attendance or hours, or
  - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the state will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

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

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<sup>3</sup> The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

Ohio is applying the same process as it did for school year 2021-2022. Ohio will use CACFP lunch claim data from ODE as an indicator of reduced access to lunches for children on SNAP Under 6 population. Specifically, for the benefit month in the current 2022-2023 school year, Ohio will use the sum of CACFP lunch claims for child care centers and family day care homes as reported on the FNS-44 and compare to the data from the corresponding two most recent pre-pandemic months. Ohio will exclude at-risk lunches and adult lunches. Ohio will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.

Ohio only has statewide CACFP lunch claim data and does not have access to regional data. Claims are reported and paid at the Sponsor level for the Ohio Child and Adult Care Food Program. This does not allow the ability to break down the lunch claims data into regions. For example, a sponsor that is headquartered in Columbus with 400 sites statewide would have all lunch counts roll up and be reported under the program sponsor's headquarter location in Columbus. A reduction in claims will be considered a reduction in access to child care. If the CACFP data shows reduced lunch claims during any month between August 1, 2022 through, May 31, 2023, Ohio will proceed to the next step of determining the child-level benefit for that month.

To determine the monthly benefit, Ohio will calculate the percentage reduction in CACFP lunch claims for the month. Then the maximum number of remote learning days in the month (18 days based on 180 required school hours divided by 10 months) will be multiplied by the CACFP percentage to calculate the number of days the percentage reflects. For example, there are 18 days of remote learning possible in a specific month, and if the reduction of CACFP claims was 20%, then the number of P-EBT days for children on SNAP under 6 would be 4 days for that month. The daily rate of \$8.18 would be multiplied by 4 days for a P-EBT benefit of \$32.72 for that month.

For the first benefit issued, however, Ohio will use August and September CACFP data to determine the monthly benefit for August-December 2022. The remaining months will be based on the CACFP data for the most two recent months available as follows:

- January 2023 benefits will be issued in February 2023 based on the September and October 2022 data compared to September and October 2019.
- February 2023 benefits will be issued in March 2023 based on October and November 2022 data compared to October and November 2019.
- March 2023 benefits will be issued in April 2023 based on November and December 2022 data compared to November and December 2019 data.
- April 2023 benefits will be issued in May 2023 based on December 2022 and January 2023 data compared to December 2019 and January 2020 data.
- May 2023 benefits will be issued in June 2023 based on January and February 2023 data compared to January and February 2019 data.

A child is considered enrolled in a covered child care facility if the child is a member of a household that is enrolled in SNAP in the benefit month. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.) Ohio will identify all children in Ohio's eligibility system (Ohio Benefits) who were under age 6 as of August 1, 2022 and will issue P-EBT benefits only for the months the child was enrolled in SNAP between August 2022

– May 2023 and the CACFP data shows a reduction in lunch claims. A child who turns 6 after August 1, 2022 and did not receive P-EBT under the 2022-2023 School Children P-EBT plan for the months they received SNAP benefits will be eligible under the P-EBT Child Care plan through May 31, 2023, or until the federal PHE ends, whichever is sooner, under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year. Ohio understands that a child’s eligibility for P-EBT benefits ends when a child’s SNAP enrollment ends. Ohio will ensure that children who receive P-EBT benefits under the state’s approved plan for school children will not also receive P-EBT child care benefits by comparing the SNAP under 6 children against the school age P-EBT data for that same month. Benefits for school age children are always issued the month after the benefit month (for example, February benefits were issued in March) so we will always have the school age benefit file to compare the children on SNAP under 6.

Ohio confirms it will:

- Identify SNAP-enrolled children under age 6,
- For each month from August through May, determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2022-2023 to the same months prior to the pandemic,
- Calculate a separate P-EBT benefit for each month of the school year where CACFP data indicates a reduction in child care access:
  - For the benefit months of August 2022 through December 2022 calculate the reduction in CACFP lunch claims relative to the months of August 2019 through December 2019,
  - For the benefit months of January 2023 through May 2023 calculate the reduction in CACFP lunch claims from the most recent two months of available data and compare to the same months in 2019 or early 2020, as described above.
  - Multiply the calculated reduction in lunch claims to the average monthly number of instructional days for school children (18 days) and the daily benefit amount to determine the P-EBT benefit for the month,
- Provide USDA with the state’s calculations and tentative monthly benefit amounts for confirmation prior to issuing benefits,
- Confirm that lunch claims, where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months,

## 6. Benefit Levels

### *Standard for Benefit Levels*

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	<b>\$8.18</b>
Alaska	6.87	4.21	1.75	<b>12.83</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	<b>9.45</b>

**Notes:**

1. Lunch rates include the 8 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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]

For school children, Ohio will provide \$8.18 for each eligible day the student is learning remotely or scheduled to be at school with reduced hours of attendance and did not receive a meal at school; for each day they are not at school due to COVID-19 (e.g. sick or quarantined).

For virtual or homeschool children, Ohio will make a simplifying assumption of 18 days per month for each child beginning with the month of application for P-EBT. Ohio is using 18 days since federal law requires 180 days of instruction and the majority of Ohio's schools have instruction in 10-month period.

As described above, to determine the monthly benefit for children on SNAP under 6, Ohio will calculate the percentage reduction in CACFP lunch claims for the month. Then the maximum number of remote learning days possible for schools in the month (18) will be multiplied by the CACFP percentage to calculate the number of days the percentage reflects. For example, if the reduction of CACFP claims was 20%, then the number of P-EBT days for children on SNAP under 6 would be 4 days for that month. The daily rate of \$8.18 would be multiplied by 4 days for a P-EBT benefit of \$32.72 for that month. In determining the percentage reduction in claims, Ohio will use standard rounding to the whole number; for determining the number of P-EBT days, Ohio will use standard rounding to the whole number.

## 7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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.
- 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:** [please use as much space as needed]

### **Implementation:**

ODE will send notice to schools for student data collection in November for the months of August-October 2022, and the message will also include due dates for the monthly data collection for each month following. Management Council's online P-EBT application for virtual and homeschool students will not be opened to parents until February 2023 in order for Ohio to hire and train staff to process the income verifications. The online application will only be available until May 31, 2023 so that all applications and benefits can be issued before September 30, 2023. Benefits will be issued as follows once the P-EBT plan is approved by FNS:

- School students:
  - First issuance - Ohio will issue benefits at the end of the month the P-EBT plan is approved for any months that school student data has been submitted. This is contingent upon the plan being approved at least 10 days before the end of the month. If approved in the last 10 days of the month, the benefits may be issued in the following month.
  - Ongoing issuances - After the first benefit file for school students, P-EBT benefits will be issued the month following the month benefits are for. For example, P-EBT benefits for December will be issued by the end of January; benefits for January will be issued by the end of February.
  
- Virtual/homeschool students:
  - Benefits will be issued once the application has been fully processed and certain eligibility requirements verified. Ohio will do the following for income verification:
    - Ohio will require **all applicants** to submit income documentation **at the time of application**. Although this requires more from applicants than is required for an NSLP application, it will serve to reinforce the eligibility standards for households that may not have filled out an NSLP application in the recent past (or at all). Up front income documentation also relieves Ohio from having to send verification notices to applicants and follow-up with non-respondents.
    - Ohio will use the documentation provided by households with their applications to verify the eligibility of the first 100 applicants.
    - If the error rate for this first 100 is at or below 5 percent, Ohio will review and verify the documentation for **10 percent** of remaining applications. All applications will be time stamped in the system and Ohio will review and verify every 10<sup>th</sup> application received.
      - If at any time, the error rate rises above 5 percent, Ohio will resume verifying the documentation for all applicants.
  
- SNAP under 6:
- For the first benefit issued, however, Ohio will use August and September CACFP data to determine the monthly benefit for August-December 2022. The remaining months will be based on the CACFP data for the most two recent months available as follows:
  - January 2023 benefits will be issued in February 2023 based on the September and October 2022 data compared to September and October 2019.
  - February 2023 benefits will be issued in March 2023 based on October and November 2022 data compared to October and November 2019.
  - March 2023 benefits will be issued in April 2023 based on November and December 2022 data compared to November and December 2019 data.
  - April 2023 benefits will be issued in May 2023 based on December 2022 and January 2023 data compared to December 2019 and January 2020 data.
  - May 2023 benefits will be issued in June 2023 based on January and February 2023 data compared to January and February 2019 data.
- All students who can be matched to a current SNAP household will have their benefits issued to the SNAP account. For students not in receipt of SNAP or who could not be matched to a current SNAP household, benefits will be issued to the active P-EBT card for the child. Families have been informed by Job and Family Services to keep the P-EBT card with

previous issuances, therefore new P-EBT cards will only be issued to newly eligible children not in receipt of SNAP. The P-EBT card is a general P-EBT design and is different than Ohio's SNAP card. Any P-EBT replacement cards ordered by a family will also be the P-EBT card. Communications to families about the P-EBT program and eligibility tell them to keep their cards.

- P-EBT cards that are returned as undeliverable from the Post Office to the EBT card vendor will be flagged in the EBT system as “returned”. On a daily basis ODJFS will send a returned cards report to Management Council, who will then be able to determine if a family reporting they did not receive a benefit had a card returned or if data was not provided from the school. When the families or schools provide a correct address, Management Council will provide the updated information to ODJFS. ODJFS staff will then issue a replacement card through the EBT system.
- The sub-benefit type will be P-EBT and the availability date will be determined by the child's last name (as described in section 3 above). The P-EBT benefit will have the highest spend priority amongst all benefit types and will follow the standard expungement rules.

## 8. Customer Service

### *Recommended Standard for Household Support*

USDA strongly encourages states to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages states to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

***To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -***

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

In order to communicate with families about the P-EBT program and eligibility criteria, ODJFS and ODE will develop a Q&A document that schools will be asked to make the communication available to all families, utilizing multiple methods of communication. The document will explain how to PIN the card, what to do if they do not want the benefits, how benefits can or cannot be used, and the customer service number to call with questions. The Q&A document, and the P-EBT card buck slip (with instructions on how to PIN the card) will be translated into other languages, including but not limited to Spanish and Somali. ODJFS will post both the English and non-English versions of the documents on its website and will share them with our advocate partners. ODJFS will also use social media to announce the first issuance under this plan. ODE will publicize this information on their webpage and link to the ODJFS website and tools and use social media to promote awareness.

For virtual/homeschool children, ODE will provide information on the program and new application to the virtual schools to share with their students' families and will ask school districts

to share this same information with families who have filed their homeschool plans, as the families are required to do by law. Ohio will work with local advocacy groups, such as the Ohio Association of Foodbanks who has a website about Ohio's P-EBT, to inform families of the new application process and other educational stakeholders as well as where families can go to get help applying online. Additionally, we will communicate with the homeschool association.

As with previous P-EBT benefits, schools and school districts can offer to have P-EBT cards mailed to them for homeless youth.

ODJFS implemented functionality in its SNAP eligibility system to assist in automating the file process to the EBT vendor. This functionality will produce a notice for each child that is issued a P-EBT benefit. It will provide the following information: child's name, child's DOB, benefit amount, benefit month, benefit issuance date, whether the benefit was issued to an active SNAP account or to a P-EBT card, and a brief description of what benefits can and cannot be used for. It will also provide a phone number for clients to call with questions about the program or the benefits. This notice will be issued with each monthly benefit issuance. It will also contain static text in both Spanish and Somali providing the customer service phone number to call for translation assistance.

The P-EBT customer service line has been operational since May 2020 and will continue to be operational through at least June 2023. Management Council manages all customer service calls as it is best situated to research benefit issues and make contact with the schools. It will be responsible for handling all the phone support for schools and parents regarding P-EBT benefits, including benefit disputes and issuance errors. Management Council will provide, host, and manage the Service Desk software that will track each customer contact and student query being handled by Management Council Service Desk. Management Council will provide JFS and ODE service desk reports reflecting activity and performance. Management Council has access to translation services to assist limited-English proficient families.

If a family contacts support stating a belief that their child should have received a benefit, Management Council will collect the relevant information and contact the school. Upon verification that the student should have received a benefit, the school can then submit the student during the next data collection for all previous months in which a student did not receive a benefit. If the family is questioning the number of days for which the student should have received the benefit, upon verification the school can submit an updated number of applicable days. Additionally, for disputed custody issues, families will be directed to work with the school, and the county agency if necessary, to have the information corrected. Once the schools submit the corrected information, benefits will be re-issued to the correct family for the first full month custody and PEBT eligibility began in the school year.

If a family needs a replacement card, they are first directed to call the EBT vendor, Conduent. If they are unsuccessful, the family can call Management Council customer service line. When a family calls Management Council the following process is used:

1. Replacement card request and child information is recorded on a tracking sheet.
2. Management Council sends ODJFS the tracking sheet daily.
3. ODJFS staff update the address in the EBT system and issue a replacement card.

## 9. Over-issuance of P-EBT benefits

*To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.*

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

Management Council and ODJFS will log and track over-issuances identified. If an overpayment occurs, Ohio proposes to reduce future P-EBT benefits by the amount of the overpayment until it is repaid in full upon approval from FNS. If the benefit cannot be repaid in full by offsetting with future benefits, then Ohio will not seek recovery of the remaining amount. Since benefits are issued a monthly basis, the most an overpayment for a month would be approximately \$42 per month (based on an average of 6 days of benefits per month). The state would incur more administrative costs in establishing the claim and seeking recovery than the cost of the actual overpayment.

When reducing P-EBT benefits to repay an overpayment, Ohio would notify the families through a robo-call or robo-text that would provide the specific amount of the overpayment and the amount of benefits reduced. If the schools did not provide a valid phone number in the data, Management Council will work with the schools to make contact with the family to provide notice of the overpayment and offset of current benefits.

Ohio will notify USDA of all over-issuances through the over-issuance spreadsheet from USDA and will not attempt to reclaim benefits from households before consulting with USDA.

#### **10. Benefit Issuance Reporting**

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

#### **11. Administrative Funding**

A separate grant to cover state level administrative costs associated with the administration of P-EBT will be awarded to the SNAP state agency within each state, for the period of performance October 1, 2022 through September 30 2023. As the authorized grantee, the SNAP state agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP state agency, the SNAP state agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP state agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

**12. Release of Information**

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

**13. Civil Rights Statement**

The state will continue to comply with civil rights requirements 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.

**14. Administration of State P-EBT Plan**

The state will administer P-EBT according to the terms of its approved state plan. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

**Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:**

Betsy Suver, SNAP Director, Ohio Department of Job and Family Services

*Betsy Suver*

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Signature  
Print Name and Title

Brigitte Hires, Director of Office of Nutrition, Ohio Department of Education

*Brigitte Hires*

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Signature  
Print Name and Title

**Date of Request: 1/18/23 Resubmitted**