

Pandemic EBT: Child Care Aged State Plan
Submitted: June 9, 2022
Amended: July 6, 2022

1. **State:** California
2. **Primary Citations:** Families First Coronavirus Response Act; Continuing Appropriations Act, 2021 and Other Extensions Act; Consolidated Appropriations Act, 2021; American Rescue Plan Act
3. **Executive Summary:**

As provided by the American Rescue Plan Act, California's Pandemic EBT (P-EBT) plan for School Year (SY) 2021-22 relies on the receipt of Supplemental Nutrition Assistance Program (SNAP) to establish P-EBT eligibility and Child and Adult Care Food Program (CACFP) meal claims to establish benefit levels. This plan is only for children in child care. The following entities will be involved in the administration of P-EBT:

- The California Department of Social Services (CDSS) is responsible for determining P-EBT eligibility for child care aged children and 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.

Date Range

The date range covered by this plan for children in child care is August 2021 through May 2022.

Estimates

The State commits to informing the USDA of any significant increase or decrease in these estimates during the date range covered by this plan. The upper-bound estimates of P-EBT issuance during the date range covered by this plan are as follows.

Estimated Total Children Served & Monthly Issuances

Estimated number of child care aged children in SNAP households is 800,000.

Monthly Issuances

August 2021 through May 2022: \$36,000,000 (total number of P-EBT eligible children (800,000) multiplied by the proposed average benefit of \$45 per month)

Total Issuances

August 2021 through May 2022: \$360,000,000 (total number of P-EBT eligible children (800,000) multiplied by the proposed average benefit of \$45 per month over 10 months).

Estimated Grand Total: \$360,000,000

Tentative P-EBT Issuance Schedule

Tentative Issuance Schedule													
SY 2021-22 P-EBT for Child Care Aged Children													
Month of SNAP Receipt													
Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Mailing & Issuance
First Issuance (New cards)													August 2022
					Second Issuance (New and existing cards)								September 2022
										TBD			TBD

4. P-EBT for Child Care Aged Children

California will determine child care aged children P-EBT eligible by identifying young children under age six as of August 1, 2021 who were certified for SNAP benefits at any point during the months of August 1, 2021 through May 31, 2022. Consistent with P-EBT’s authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility. California will use data held in the state’s SNAP eligibility system, the Statewide Automated Welfare System (SAWS), to identify these children. The State understands that a child’s eligibility for P-EBT child care benefits ends when a child’s SNAP enrollment ends.

Because reporting addresses for CACFP sponsors not consistently aligning with the geographical location of services provided, California is not basing child care eligibility on proximity to area schools in this plan. All eligible young children will be issued a single statewide benefit for each month of SNAP eligibility in SY 2021-22.

California will conduct two assessments to determine statewide eligibility for SY 2021-22 P-EBT for child care aged children by analyzing CACFP statewide lunch claim data. The CACFP lunch claim data will be used as an indicator of access to meals and child care for children under six receiving SNAP.

Aggregate CACFP lunch claim data will be analyzed for two separate data periods: fall semester (August through December 2021) and spring semester (January through May 2022). Analyzing aggregate CACFP lunch claim data reduces month-to-month variances that may occur because of factors unrelated to COVID-19. The percentage reduction of aggregate CACFP lunch claims for each data period in SY 2021-22 when compared to pre-pandemic months will be used to determine benefit levels. The CACFP lunch claims for at-risk programs, emergency shelters, Head Start programs, and school-aged centers will be excluded from the data assessments.

As there will be two data assessments of CACFP lunch claims, two separate monthly

benefit amounts will be identified. The first monthly benefit amount will be calculated using the percentage reduction of aggregate statewide CACFP lunch claims for the fall semester when compared to the same months in 2019. The second monthly benefit amount will be calculated using the percentage reduction of aggregate statewide CACFP lunch claims for the spring semester (January through May 2022) when compared to the same months in 2019.

From analysis of the CACFP lunch claim data (detailed below), California determined that the state’s child care system in the fall semester continued to operate at significantly reduced capacity because of the COVID-19 pandemic. California will conduct an additional analysis of CACFP lunch claims for the spring semester to determine P-EBT eligibility and benefit levels for those months.

The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in SY 2021-22 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.

5. Benefit Levels

The CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year through March 2022 relative to the same months immediately prior to the pandemic. For purposes of this plan, 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. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state’s lunch claims for the fall semester.

Table 1: CACFP Lunches Served – Day Care Homes & Child Care Centers Excluding At-Risk Lunches and Adult Lunches in California, Fall Semester

	Total Meals Served Aug – Dec 2019	Total Meals Served Aug– Dec 2021	Total Meal Reduction	% Meal Reduction	Monthly Benefit Allotment Aug-Dec 2021
August	3,646,462	2,523,709	-1,122,753	-30.79%	\$39.00
September	3,665,322	2,423,994	-1,241,328	-33.87%	\$43.00
October	4,266,925	2,515,568	-1,751,357	-41.04%	\$52.00
November	3,388,540	2,414,788	-973,752	-28.74%	\$37.00
December	3,229,490	2,290,654	-938,836	-29.07%	\$37.00
Grand Total	18,196,739	12,168,713	-6,028,026	-33.13%	\$42.00

The State will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using the following three factors:

Fall semester benefit:

California P-EBT Plan SY 2021-22

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[180] \div [10 \text{ months}] = [18]$ days per month.
3. The school year 2021-2022 P-EBT benefit per day of \$7.10.

Spring semester benefit:

1. The spring semester benefit will be calculated as above but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor.
2. Before calculating its monthly spring P-EBT benefit, the state commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

The average percentage reduction in aggregate lunch claims in each semester period will be multiplied by the maximum monthly P-EBT allotment (18 school days X \$7.10 daily rate = \$127.80 per month) to calculate the monthly statewide P-EBT allotment.

As California experienced a statewide reduction in CACFP lunch claims in the fall semester, all children under six statewide will be eligible for P-EBT benefits for the months they were receiving SNAP benefits during that period. The master list of eligible child care aged children will be de-duplicated against the master list of eligible school aged children to ensure that P-EBT eligible children, across both the school and child aged categories, only receive one P-EBT benefit per month. As P-EBT benefit issuances will be delivered after SNAP benefits are delivered, SNAP eligibility for children under six will be finalized and collected retroactively.

The state will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

Benefit Issuance Schedule

The SY 2021-22 P-EBT cards for child care aged children will be mailed over the course of approximately 1 to 1½ months (depending on the number of eligible children). As such, the benefit issuance will be naturally staggered based on when cards reach eligible families. The second issuance, for children who previously received a SY 2021-22 P-EBT card, will be reloaded onto existing cards during the second half of the month. This approach will ensure that P-EBT benefit issuance does not overburden the State's EBT

retailer or existing EBT infrastructure, including the California EBT customer service center or SNAP emergency allotment distributions. Six months of P-EBT benefits will be issued in the first issuance and four months of P-EBT benefits will be issued in the second issuance.

Tentative Issuance Schedule													Mailing & Issuance
SY 2021-22 P-EBT for Child Care Aged Children													
Month of SNAP Receipt													
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										TBD			TBD

6. Implementation Timeline, EBT Processing and Benefit Issuance

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

- July 11 to July 30, 2022: CACFP lunch claim data and P-EBT eligibility list for the fall/spring semester benefit months finalized.
- July 16 to August 15, 2022: P-EBT data prepped for and transferred to EBT processor.
- August 16 to August 31, 2022: First P-EBT card mailing for fall semester benefit months.
- September 1 to September 15, 2022: P-EBT data prepped for and transferred to EBT processor.
- September 16 to September 30, 2022: Second issuance for spring semester benefit months. P-EBT cards for newly eligible child care aged children mailed.

EBT Processing & Benefit Issuance

California will issue P-EBT benefits on dedicated P-EBT cards for all P-EBT recipients. All 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 3.0” 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 SAWS. Child care aged

children experiencing homelessness or otherwise having no permanent address will have their P-EBT cards mailed to their local county welfare department address. The CDSS will collaborate with county welfare offices to coordinate distribution of P-EBT cards to children with no permanent addresses in SAWS. 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. 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 existing SNAP expungement rules, except for dormancy. 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

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 radio (with live reads), digital (connected TV, YouTube, Streaming 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 series of direct mail communications to P-EBT eligible families. Ahead of the first issuance, 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, and updates on

implementation and issuance timelines. A second direct flyer will be delivered to eligible households prior to the second benefit issuance. This second flyer will include an explanation of the availability of upcoming benefits and will direct clients to the P-EBT website or P-EBT Helpline for more information.

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.

More complicated calls that cannot be resolved by Tier I P-EBT Helpline agents will be addressed by Tier II P-EBT Helpline agents. Tier II P-EBT agents will have more in-depth knowledge of P-EBT eligibility, including the number of P-EBT eligible days used to determine benefit amounts. Both Tier I and Tier II P-EBT Helpline agents will be able to access language line support as needed to provide service in languages other than English. Neither Tier I nor Tier II P-EBT Helpline agents will be able to determine P-EBT eligibility.

Additionally, California will implement 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.

P-EBT Appeal Process

To ensure that all eligible children receive P-EBT benefits, California will implement an appeal process for child care aged children who were not initially identified as eligible for SY 2021-22 P-EBT. The appeal process would function as a part of the P-EBT Helpline, with dedicated staff to process appeals. Helpline staff will confirm if the appealing child received SNAP benefits sometime in SY 2021-22. If so, the helpline will notate the client's details, and send the child's information to CDSS to confirm receipt of SNAP benefits. Once CDSS confirms receipt of SNAP benefits, a SY 2021-22 P-EBT card will be mailed out for the child. Benefits will only be provided for the months in which the child was receiving SNAP benefits in SY 2021-22. As part of the appeal process, parents/guardians will provide the following information: Child name, child date of birth, parent name, mailing address, email address, and phone number.

The P-EBT Helpline will follow up on all appeals with an approval or denial message to the client. This confirmation message may be sent by phone, text, or email.

Accessibility

The CDSS and CDE are 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 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 may also receive P-EBT cards on behalf of P-EBT eligible families experiencing homelessness.

8. Overissuance of P-EBT Benefits

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 children will be assigned a unique identifier. This unique identifier will be used throughout the data match process to ensure individual 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 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 overissuance of P-EBT benefits. The State will contact USDA whenever it identifies an issuance error. Further, the State will provide a description of the error, the number of children involved, and the value of the over-issuance. 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 and local level administrative costs associated with the administration of P-EBT will be awarded to both CDSS and CDE. As the authorized grantees, the CDSS and CDE will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. Prior to USDA releasing the grant for administrative funding, CDSS and CDE will submit a P- EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement.

As noted in Item 9 above, CDSS 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, including the provision of equal access to individuals with disabilities and individuals who are limited English proficient, as described above.

13. Administration of State P-EBT Plan

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

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

Kathy Yang
Acting Chief, CalFresh and Nutrition Branch
California Department of Social Services

Date of Request: June 9, 2022