

# Kansas P-EBT Childcare Plan for School Year 2021-2022

## 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* covered by this initial plan (or subsequent amendment).

### a. The *date range* covered by this State plan or amendment

- for children in childcare that are also included in a SNAP household for the months of August 2021-May 2022.

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

- Estimated monthly amount for Childcare P-EBT: \$1,220,000
- Estimated total amount issued to non-school children in childcare: \$12,200,000

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

- Estimated number of non-school children in childcare: 50,000

### d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

- The agency will issue childcare P-EBT in late September 2022, in one payment with staggered issuance over a 10-day period by alpha. Issuance dates are TBD.

## 5. P-EBT for Children in Child Care (see Q&As #25-33)

### *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.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- 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 #29)

- 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 that child's eligibility? 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.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

**Response:**

**Responsible state agencies**

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- Kansas Department for Children and Families and Kansas State Department of Education

**Identifying SNAP Enrolled Children**

- The state will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered childcare facility through the end of the school year as long as the household continues to receive SNAP.

- The state understands that a child’s eligibility for P-EBT childcare benefits ends when a child’s SNAP enrollment ends.
- 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.

**Establishing a Reduction in Access to Child Care Using the CACFP Data Method**

- CACFP lunch claims confirm that there has been a statewide reduction in access to childcare 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 childcare 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.
- 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.

**Setting Benefit Levels Using the CACFP Data Method**

- The state will set an average monthly P-EBT childcare 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:**

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:  $[186] \div [10 \text{ months}] = [18.6]$  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. See Table 2. To determine the benefit level for the

Spring semester months, Kansas will compare CACFP lunch data for the months of January - May 2022 to the pre-pandemic months of January – May 2019 and set the benefit in the same manner as described.

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 CCACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

**Table 1: Reduction in CACFP lunch claims – fall semester**

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:  To be applied to daily rate and number of school instructional days per month.
August 2019	569,864	August 2021	468,155	
September 2019	528,101	September 2021	432,831	
October 2019	601,962	October 2021	449,281	
November 2019	499,905	November 2021	433,450	
December 2019	476,544	December 2021	412,784	
<b>Total</b>	<b>2,676,376</b>	<b>Total</b>	<b>2,196,501</b>	<b>-17.9%</b>

**Table 2: Reduction in CACFP lunch claims – spring semester**

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester:  To be applied to daily rate and number of school instructional days per month.
January 2020	564,773	January 2022	405,163	
February 2020	539,881	February 2022	418,626	
March <b>2019</b>	570,895	March 2022	530,761	
April <b>2019</b>		April 2022		
May <b>2019</b>		May 2022		
<b>Total</b>	<b>1,675,549</b>	<b>Total</b>	<b>1,354,550</b>	<b>-19.2%</b>

**Average monthly P-EBT childcare benefit, fall and spring semesters:**

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit
Fall Semester	17.9%	<b>18.6</b>	5	\$ 7.10	\$ 23.68
Spring Semester	19.2%	<b>18.6</b>	<b>5</b>	\$ 7.10	\$ 25.30

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

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to SNAP State agency (Day #5)
  - P-EBT hotline becomes active (Day #9)
  - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households? If so, who will receive these cards? Non-SNAP households only? Or also SNAP households? If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

**Response:**

In Kansas the goal is to issue August 2021 – May 2022 Childcare P-EBT benefits within 75-90 days of receiving the approved P-EBT plan. The state may need to change the issuance schedule depending on when the plan is approved. The tentative timeline is as follows:

Day 1 – Plan approval is received.

Day 10-75 – Develop, Build and Test Auto Issuance process in KEES.

Day 15 – Benefit amount finalized.

Day 75-90 – DCF will begin to issue childcare P-EBT benefits to directly certified households, notices sent to households. Public Notice campaign begins.

Day 75-90– P-EBT benefits available on cards, start of staggered issuance over a 10-day period for automated benefits.

DCF will use the regular Kansas Benefit Card for P-EBT benefits. DCF will not issue new EBT cards to P-EBT households unless the household does not have an active EBT card. A card will be sent to the household if one has never been issued in the past. Kansas will follow the same distribution model utilized in the previous P-EBT program. All EBT accounts are established in the name of the head of household. All P-EBT households will receive P-EBT benefits on an EBT card. If a household needs a replacement card the client will call FIS at Customer Service for a replacement card, and it will be re-issued. All replacement cards will be sent from FIS via the mail. Undeliverable cards will be returned to FIS who will in-turn provide DCF with this information. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. The draw priority will be P-EBT, SNAP, and D-SNAP. P-EBT will draw first priority.

EBT Benefit Issuance:

- Sub-benefit type to be used for Child Care P-EBT: **EBT25812**
- Benefit draw priority: The P-EBT benefits identified as EBT 25812 will be used first ahead of any existing SNAP authorizations or future SNAP authorizations. Kansas will follow the existing State SNAP expungement timelines.

**13. Civil Rights Statement**

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

The state of Kansas wishes to incorporate the following sections from our approved 2020-2021 P-EBT school year plan.

- 8. Customer Service
- 9. Over-issuance of P-EBT benefits
- 10. Benefit Issuance Reporting
- 11. Administrative Funding
- 12. Release of Information
- 14. Administration of State P-EBT Plan

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



Signature

Print Name and Title Laura Howard, Secretary



Signature

Print Name and Title Cheryl Johnson, Director of Child Nutrition & Wellness, KSDE

**Date of Request** 7/6/2022