

State Plan for Pandemic EBT
Summer 2023
February 16, 2023

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in childcare during summer 2023. (2) This document relates to Section 1101 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Additional context and background for this document can be found at:

<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

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

Summer 2023¹
February 16, 2023

*Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 **without** a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.*

1. **State:** Illinois

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

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the summer period covered by this initial plan (or subsequent amendment).

- a. Estimated total amount of P-EBT benefits the state will issue to school children within this amendment's date range.² (Consult the appropriate table in Section 4, "Benefit Levels.")
- b. Estimated total number of school children to which the state will issue P-EBT benefits.
- c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Assuming that the public health emergency ends on May 11 as anticipated, P-EBT funds will not be available beyond the end of fiscal year 2023. **As a result, states must issue all P-EBT benefits by September 30, 2023.** This applies to P-EBT benefits for school year 2022-2023 and summer 2023. Benefits issued by the states for the summer and school year after this date may result in liability to the state.
- d. Names of state agencies involved in administering this plan.

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

² The Biden Administration recently announced that, at present, it intends to end the COVID-19 public health emergency declaration on May 11, 2023. In the event that the public health emergency does end on May 11, prior to the start of P-EBT's covered summer period, states may not issue P-EBT summer benefits to children in child care in 2023.

Response: [please use as much space as needed]

a. Estimated total amount of PEBT Benefits the state will issue:

\$ 136,994,760.00

b. Estimated total number of children to which the state will issue P-EBT benefits.

- School children: 1,141,623

c. Tentative Summer P-EBT issuance schedule

August 11th-30th, 2023

*We will use August and/or September to do clean-up runs, to issue benefits to any child not coded properly at the time of original summer issuance pull in the Student Information System.

d. Names of state agencies involved in administering this plan.

- Illinois Department of Human Services
- Illinois State Board of Education

4. Summer P-EBT for school children:

c. Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced-price school meals under the NSLP or SBP. This group includes:

- School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
- Children who were directly certified for free school meals or who were certified by application for free or reduced-price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e., at the end of SY 22-23).

f. Describe how the state will ensure that households with children eligible for free or reduced-price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023.

Response: [please use as much space as needed]

- The school year in Illinois goes through May for some schools and June for other schools. Illinois will look at student enrollment for public schools in the month of May 2023 at eligible NSLP participating schools. For any child that is enrolled, we will then review for “Free/Reduced Meal” eligibility, which is either a low-income indicator or enrollment in a CEP school. *Additionally, the State will do additional checks to determine if any new FRL child was enrolled for the first time in the Month of June 2023 in an eligible school, and therefore was not caught when reviewing May enrollment. This will ensure no child is missed. Non-public NSLP schools will follow the process of the prior year to send a list of only children eligible for Free/Reduced price meals that were enrolled at the end of the school year.
- Information will be given to schools that Free/Reduced Price Meal applications must be accepted over the summer until 6/30/2023. Many schools offer online applications, but if not, a mail in option or drop box will be available. The School Year 22/23 information will remain editable in the IL State Board of Education Student Information System (SIS) until July 31, 2023. Schools that have staff on site through the summer will be able to update Free/Reduced Price Lunch (FRL) status for students throughout the summer. Schools that do not have staff on sight will have time, prior to the closure of SIS, once staff are back on site, to review applications that were received prior to 7/31/2023 and update FRL status for the prior school year. A final query will be run at the end of this process to identify any children that were just made eligible over the summer period in order to issue them Summer PEBT benefits. Upload options will remain open for all nonpublic schools during this time to mirror the public schools’ options.

5. Benefit Levels

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

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

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 2023 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that states build their timelines from the date USDA approves the state's plan (Day #0).
- The timeline must include the state's tentative issuance dates. In past years, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP state agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

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

Response: [please use as much space as needed]

Timeline:

- If FNS approval is received, tentative schedule is to receive ISBE attendance and student data in the month of June 2023. Illinois would want to issue School Year PEBT first, so to give the most time for customer attestation of COVID related days. Summer P-EBT issuance is

expected to occur in August 2023. A 2nd ‘clean-up’ file of any newly approved or missed children will be ran in September 2023.

- Issuance will be created and available in August 2023, since P-EBT amount is expected to be lower, but availability will be spread as it was last year:

Availability Date	First Letter of Last Name
11	A
12	B
13	C
14	D, E, F
15	G
16	H, I
17	J, K, L
18	M
19	N, O, P
20	Q, R
21	S, T
22	U, V, W, X, Y, Z

- Illinois will use a unique P-EBT card design. All P-EBT children will receive the same P-EBT card, both SNAP and non-SNAP.
- Illinois will utilize the same P-EBT accounts as the prior year.
- As with prior issuances, Illinois will utilize a unique issuance type in the eligibility system and within the State’s EBT system to distinguish P-EBT issuances from DSNAP and regular SNAP issuances. This issuance type allows the State to pull any needed reporting data from our systems related to P-EBT. The P-EBT issuances are flagged separately from DSNAP issuances in both the DHS EBT system and the DHS eligibility system.
- Illinois will load School and Summer P-EBT into separate accounts for P-EBT only, therefore spending priority is not applicable to this round of P-EBT.
- Illinois will utilize the same expungement timeframe that is uses for SNAP issuances, which will transition to 274 days of availability and 274 days of no use.
- The EBT vendor will process undeliverable Link cards in the same manner as all undeliverable Link cards. They will be processed and marked as “undeliverable” in the EBT system. Our current logic for existing cases, will detect address changes and a currently undeliverable status to generate a new card be mailed upon address update. In addition, the State has the ability to generate reports detailing any undeliverable cards to children and target these children for address remediation.
- Illinois will use existing logic to determine if a new P-EBT cards to each child will need to be sent with this round of P-EBT, as these are existing accounts. All cards will be issued directly to eligible children with this plan.

7. Customer Service

To complete Section 7, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- How will the state resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the state's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA

recommends flyers/brochures, because these can be used more flexibly than buck slips.

- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

- **Problem Resolution:**

- Illinois will utilize the established designated P-EBT email box. DHS.FCS.PEBT@Illinois.gov for inquiries regarding P-EBT.
- Illinois will also put a one-page P-EBT student address change form available on the IDHS Website for families to easily report address changes for eligible students.
- Illinois will continue to use a designated 800 number to assist customers that have questions or concerns about their P-EBT benefits.
- IDHS will create a Desk Aid for Hotline staff to utilize for assisting with P-EBT callers.
- At IDHS, staff from both Regional office and central office will be reassigned to work P-EBT inquiries and corrections. Additional staff may be brought in if needed, or staff may be reassigned if not needed.
- ISBE will have staff available to assist with inquiries from schools or from IDHS staff that IDHS staff are unable to resolve on their own investigation.

- **Service Barrier groups:**

- The State will still have all the same methods established in prior school years available to serve these groups. The most effective method for getting cards to families with barriers has proven to be to direct families into our FCRCs where they are issued a Link card. These families would receive a card that looks like a “regular” SNAP Link card but will function the same as the white cards and connect to their P-EBT account. Under the current school year plan, Illinois will be issuing benefits to the address on file with the school or updated address from the customer on the existing account. The address for foster children is already currently collected on all public-school children. We will also partner with our sister agency to ensure foster families have the current address on file with their schools. Additionally, Illinois will be utilizing existing relationships with outreach agencies to ensure adequate assistance is available for those that are in need, as we currently service our regular population.

- **Public Information Campaign:**

Illinois will utilize the Communications Departments at both ISBE and IDHS to complete an information campaign regarding the program. Information will be given to the public through both written press releases and included in news announcements. Additionally, information will be posted on the IDHS external website and announced over the various social media accounts. Any communication will be sure to include only students that attend an NSLP school without access to an in-school lunch are eligible for the program.

- **P-EBT customer information**

The P-EBT card comes on a tri-fold paper that contains all the important P-EBT program information.

The Illinois P-EBT webpage at www.dhs.illinois.gov/pebt will continue to be utilized.

Information regarding Summer P-EBT and an FAQ will be posted, as with prior years.

The IDHS website utilized Google Translate technology and is available in the many languages provided through Google Translate.

The Link Brochure, Hotline, and EBT Website in Illinois is available in 6 languages, English, Urdu, Arabic, Polish, Mandarin, and Spanish. Notices produced from our eligibility system are only available in English and Spanish. Illinois does have a translator service that is used for any telephone calls where translation is needed.

8. Over-issuance of P-EBT benefits

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

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]

- Illinois has been diligent to mitigate the risk of over issuance of school P-EBT benefits. Mitigation actions include but are not limited to:
 - Extensive testing of the calculations and logic used to produce the issuances is performed and reviewed before being executed in production.
 - As with previous years' processes, P-EBT benefit data is stored in a table designated for P-EBT by child (individual ID) by benefit month and amount.

- A “sanity” check edit is used at the end of the issuance creation process to ensure that no other issuance (during a previous process or with current process) has been created for the specific child for the specific benefit month. This will prevent duplicate issuance of P-EBT for the same child.

Illinois feels that overpayment establishment for P-EBT would create an undo hardship on Illinoisians during a public health emergency. Any over issuance would be a result of Agency error rather than the customer. This accompanied with the complication of understanding if one has even received an over issuance leads Illinois to not pursue any over issuance of P-EBT benefits for this school year.

Accuracy and maintaining program integrity is a top priority of the Illinois P-EBT team and will remain a priority even if overpayments are not pursued against the customer.

Any discovery of over-issuance of School P-EBT benefits will be reported to USDA FNS upon request. Additionally, Illinois will complete the spreadsheet provided by USDA FNS.

9. Benefit Issuance Reporting

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

10. Administrative Funding

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

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

As noted in Item 10 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

11. Release of Information

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

12. Civil Rights Statement

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

13. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Reminder

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

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

Leslie Cully

Signature

Leslie K. Cully, Illinois SNAP Director

Signature

[Print Name and Title]

Date of Request: April 17, 2023