

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

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Summary:	(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:** Rhode Island

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*¹ 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:

- a. The date range covered by this State plan for children in child care is September 1, 2022 – June 30, 2023.
- b. Rhode Island commits to inform FNS of any significant changes in expected P-EBT benefit issuance following analysis of child care access and benefit amounts for the September 2022 – June 2023 period.

¹ 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).

- c. Rhode Island estimates that approximately 11,633 SNAP participants under the age of 6 will be eligible for P-EBT for child care each month. At an estimated P-EBT benefit of \$39.75 per month, this equals:
 - a. Monthly issuance of \$462,411.75
 - b. Annual Issuance (10 months of benefits) of \$4,624,117.50
 Rhode Island commits to inform FNS of any significant changes in expected P-EBT benefit issuance following analysis of child care access and benefit amounts for the September 2022 - June 2023 period.
- d. P-EBT child care benefits for September 2022 – January 2023 are tentatively scheduled for early April 2023. P-EBT child care benefits for February – June 2023 are tentatively scheduled for early July 2023.

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

A. Eligible Children

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?² 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

² 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.

subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.

- 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: See approved plan for school-age children.

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: See approved plan for school-age children.

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-44³. 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).

³ 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.

- 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:

RI DHS, with the help of its eligibility system vendor (Deloitte), will identify the eligible SNAP under 6 population based on age requirements and monthly SNAP participation described above. This list will then be compared to the school-age population to minimize the chance of double issuance under both school-age and SNAP Under 6 eligibility paths. RI DHS is utilizing data that the Rhode Island Department of Education (RIDE) submits to FNS on CACFP lunch reimbursement claims. RIDE will play a support role in communicating SNAP Under 6 P-EBT program information to the early childhood community.

Rhode Island will conduct two assessments of statewide eligibility for issuing P-EBT benefits to this population, looking at Child and Adult Care Food Program (CACFP) Lunch Claim data as an indicator of access to meals/child care for the SNAP Under 6 population. If the majority of SNAP Under 6 caseload (children receiving SNAP between September 2022 - June 2023 and under the age of 6 as of August 1, 2022) is found to have reduced access during each

period, Rhode Island will proceed to the next step of monthly child-level benefit eligibility for that period.

From analysis of the available CACFP Lunch Claim data, RI DHS determined that Rhode Island's child care system operated at significantly reduced capacity due to the COVID-19 pandemic in September 2022. The most recently available data for September 2022 shows an approximate 27% reduction in CACFP lunches served as compared to the pre-pandemic month of September 2019. Rhode Island proposes the reliance on this most recent CACFP data available showing the approximate reduction of 27% in the number of lunches served compared to pre-pandemic numbers in the same month meets the reduced attendance/closure threshold requirement of five consecutive days.

Informed by the data that shows reduced child care access, Rhode Island proposes to determine all children enrolled in SNAP and under age 6 (as of August 1, 2022) eligible for P-EBT child care benefits throughout the state. Rhode Island will conduct an additional statewide analysis of P-EBT Standard for P-EBT Eligibility for the months of October 2022 – June 2023. If this analysis shows that there is no longer reduced access to child care for a month within the period in question, Rhode Island will not assign a benefit for that month.

Once it has been determined that statewide child care access remains reduced for the relevant period(s), Rhode Island will identify all children in RI DHS's eligibility system, RIBridges, 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 September 2022 – June 2023. This age cutoff date is in alignment with state regulation that requires children turning age 6 on or before August 1 to attend school. A child who turns 6 after August 1, 2022 and did not receive P-EBT under the 2022-2023 School Enrollment plan for the months they received SNAP benefits will be eligible under the P-EBT Child Care plan through June 30, 2023, under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year.

In summary,

- Rhode Island will identify non-school children who began school year 2022-2023 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 non-school children who began receiving benefits as a 5-year-old earlier in school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- Rhode Island understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.

- Rhode Island 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

RIDE collects and monitors CACFP meal data served in childcare settings. Programs have 60 days following the end of each month to submit claims for CACFP meals. Rhode Island proposes using the most current CACFP lunch meal data available for childcare settings to determine both whether Rhode Island is able to issue childcare P-EBT benefits that month (i.e. if the 2022/2023 data shows a decrease in the number of meals served compared to the same month in 2019) and also to set the childcare P-EBT benefit amount.

For the benefit amount, Rhode Island proposes to use the percentage reduction of CACFP lunch data compared to 2019 as the basis of a childcare P-EBT benefit amount. This monthly benefit amount assumes an average 18-day monthly attendance in childcare (180 school days required each school year/10 months). The state will multiply this percentage reduction in claims by the 18-day monthly attendance figure and the \$8.18 benefit per day to arrive at a monthly P-EBT childcare benefit. The monthly benefit for September through January will be based on the sum of CACFP lunches served September -November 2019 compared to the sum of CACFP lunches served September -November 2022, which will be calculated in early March 2023. The February - June benefit will be based on the reduction in CACFP lunches for December 2022 - February 2023 compared to the sum of CACFP lunches in January 2020, February 2020, and December 2019, which will be calculated in early June 2023.

Rhode Island commits to updating USDA each month on:

- whether Rhode Island is eligible to issue childcare P-EBT benefits based on whether the most current CACFP data available as of the end of each benefit month shows a reduction in the number of meals served in childcare settings compared to the same month in 2019; and
- the childcare P-EBT benefit amount for that month based on the most recently available data.

Rhode Island 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.

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	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

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: See RI's approve plan for school-age children for the school-age benefit amount calculation.

The average monthly P-EBT child care benefits for the fall and spring semesters will be determined when CACFP lunch claim data is available for the relevant months. RI commits to informing FNS of these benefit amounts and the method of their calculation when the data is available. At this time, the September 2022 is the only completed data available and that month's CACFP lunch claim data compared to the September 2019 lunch claims data indicates an approximate 27% reduction in claims, indicating the potential for a \$39.75 monthly benefit amount for the fall semester.

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:

The below dates are tentative and contingent upon other factors such as the date of USDA/FNS’s approval of this plan.

Day(s)	Activities
0	USDA approves the State’s plan
20	Finalized notices of eligibility provided to system vendor
24	Public notice campaign begins, information shared with United Way 211 call center
27	Benefits issued for September – January 2023 to child care children

28	Benefits available on EBT cards
160	Benefits issued for February 2023 – June 2023 to child care children
161	Benefits available on EBT cards
180	Contingency issuance for corrections

Distribution of Benefits:

All SNAP P-EBT child care eligible children will be issued P-EBT benefits to the SNAP case/card they were actively receiving benefits on during the particular month within the covered period. There is no new SNAP card design.

EBT Benefit Type:

An existing EBT benefit type will be used to identify these benefits (FS01). This benefit type not currently active/used for any other purpose other than P-EBT. This is the same benefit types utilized for the previously approved P-EBT child care issuances.

Benefit Spend Priority:

P-EBT benefits will have the first spend priority.

Expungements:

Expungements will occur according to the normal SNAP expungement rules.

Returned Mail:

Returned EBT cards/mail will be handled according to our usual process/the same as Rhode Island’s SY22 – 23 school age plan.

Replacement Cards:

RI will maintain the process that was in place during previous P-EBT cycles for replacement card issuances. Cardholders are mailed a notice prior to their P-EBT eligibility that instructs them to call the ebtEdge phone number (1- 888- 979- 9939) to request a replacement card. The RI DHS call center IVR also directs cardholders to this line if they are seeking a replacement card, and the United Way 211 line will direct individuals to this line as well. The IVR will then instruct the individual to follow the prompts to request a replacement card.

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:

Issuance errors:

Individuals can reach out directly to the DHS call center or the United Way 2-1-1 line in order to dispute their benefit amount or eligibility for P-EBT benefits. These disputes will be tracked on a tracking sheet and will be provided to DHS field staff or the EBT Coordinator for investigation. The household may be asked to provide additional verification if DHS is unable to determine if there was an issuance error. Once any necessary documentation is provided and reviewed, DHS will reach out to the household to inform them of its final determination.

If it is found that the individual did not receive a benefit that they were entitled to, a JIRA ticket will be created to provide the corrected issuance to the individual. If, after investigation, it is determined that the original benefit amount or denial of benefits was valid, the individual will be informed of their right to appeal the Department's decision.

Access Issues:

Since we are determining P-EBT eligibility via an automated data match process rather than via an application process, we do not anticipate a significant amount of access issues. Homeless individuals may need to reach out and identify a safe address for receiving their card if they do not already have one. The EBT processor's IVR prompts these individuals to provide an updated safe address. Social Security Numbers are not required for any purpose related to P-EBT. Those with limited English proficiency will be able to speak to DHS or United Way 211 representatives via an interpreter, and mailings will be provided in both Spanish and Portuguese. Households are not required to have internet access to receive these benefits as an application is not required. Individuals with disabilities will be served in the same manner in which we currently serve SNAP participants that require additional assistance.

Public Information Campaign

The State will conduct a public information campaign to alert those receiving benefits of the purpose of P-EBT and how it is to be used. This will include posting on the RI DHS web site, social media, press releases and notification to community partners.

Information to P-EBT Child Care participants

Both P-EBT child care participants will receive a mailing with the following information

- A description of P-EBT
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., only to purchase food items)
- Explanation of violations and penalties, such as trafficking
- An indication that benefits are non-transferable
- Information regarding a hotline and the DHS website with frequently asked questions
- Phone number for the EBT processor for replacement card requests

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:

Any potential benefit over-issuance that RI DHS learns of will be tracked on spreadsheet for investigation and resolution. The EBT Coordinator will investigate the over-issuance by checking the information in the eligibility system and requesting additional documentation from the household if necessary. If, after investigation, it is determined that there was an over-issuance (for example, benefits were issued to the wrong household or benefits were issued to a household that was not entitled to them), a JIRA ticket will be created to provide the corrected issuance to the eligible household. A JIRA ticket will also be created to ensure that no additional benefits are issued to the ineligible household for future months. In no instances will RIDHS reclaim P-EBT benefits by reducing a household's SNAP benefit. If benefits must be reclaimed on a case, RI will develop a plan with FNS's input and approval for collecting those benefits and providing the proper noticing.

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:



Signature
Bethany Caputo, SNAP Administrator, RI DHS

DocuSigned by:

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Signature
Jessica Patroia, Coordinator, Child Nutrition Programs, RIDE

Date of Request: 1/20/2023