



Government of the Virgin Islands of the United States  
**DEPARTMENT OF HUMAN SERVICES**

Office of the Commissioner

June 16, 2021

Ms. Bonnie Brathwaite  
SNAP Regional Division Director  
USDA/FNS Northeast Regional Office  
10 Causeway Street, Room 501 Boston, MA. 02222

Dear Director Brathwaite:

As part of the Virgin Islands Department of Human Services (VIDHS) Pandemic Contingency Plan, I am requesting approval of the attached request to issue P-EBT benefits to eligible children in school and children in childcare.

The attached revised P-EBT document outlines the Territory's plan to ensure that families with eligible children in school and children in childcare receive this benefit. VIDHS remains committed to assisting low-income individuals and families with children in our community, as well as those made vulnerable because of this pandemic. VIDHS will issue regular public service announcements as well as make guest appearances on local radio broadcasts regarding P-EBT. A P-EBT flyer will be available on our DHS Facebook page and DHS website.

On behalf of my VIDHS SNAP staff, I would like to express our appreciation for the continued support and cooperation received from you and your staff at the Northeast Regional Office (NERO). If you have any questions, please do not hesitate to call me at (340) 642-8817.

Sincerely,

Kimberley Causey Gomez,  
Commissioner

cc: Michal Rhymer-Browne, Assistant Commissioner  
Natalie L. Bailey, SNAP Administrator  
Emmanueline Archer, SNAP Territorial Director

Attachment

**State Plan for Pandemic EBT  
Children in School and Child Care, 2020-2021**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	January 29, 2021
<b>Replaces:</b>	N/A
<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in childcare during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
<b>Disclaimer:</b>	<b>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.</b>

*Additional context and background for this document can be found at:*  
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

*The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.*

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2020-2021**

1. **State:** United States Virgin Islands

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

3. **Executive Summary:**

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

*Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.*

- 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. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment. VI will provide the information in the 366 A
- e. 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 childcare

**Response:**

The US Virgin Islands proposes to build off its previously approved P-EBT plan for August and September 2020. The date range for this plan will be from August 1, 2020 through May 31, 2021. This plan will cover the following:

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

- Snack supplemental for school children that received August 2020 and September 2020 P-EBT benefits.
- P-EBT issuances for school children from October 2020 thru May 31, 2021
- P-EBT issuances for children in childcare from October 2020 thru May 31, 2021

The estimates were calculated using the available data from August 2020 thru April 2021. The April 2021 school data was used as estimates for May 2021. USVI does not expect any significant increase or decrease in these data points. But USVI is committed to inform USDA of any significant changes during the date range covered by this initial plan.

The estimates of P-EBT issuances for the date range coverage period are as follows:

- Snack Supplemental
  - Using the August and September P-EBT data, the one-time snack supplemental issuance for August and September 2020 is \$ 251,741.40.
    - The calculation is based on the number of students that received August and September P-EBT benefits multiplied by the number of school days provided by each school and multiplied by \$1.13 (snack amount).
      - $12,819 * \text{Number of schools day} * \$1.13 \text{ snack amount}$
    - One-time supplemental issuance to school children in SNAP households is \$ 120,989.10.
    - One-time supplemental issuance to school children in non-SNAP households is \$ 130,752.30.
- P-EBT for school children
  - The estimates below are based on the following information:
    - Public schools
      - Estimates were calculated using the October 2020 thru February 2021 school files provided by VI Department of Education (VIDE).
      - For March 2021 thru May 2021 estimates, VIDE cannot provide the March and April 2021 files in time to complete this state plan. VI DHS used the information provided by VIDE stating that starting March 2021 until the end of school year (May 2021), K thru Grade 3 will move from 100% virtual to hybrid learning mode. These K thru Grade 3 students will be attending school virtually 12 days a month. The rest of the students will remain in 100% virtual learning mode. VI DHS used the February public school file to determine the K thru Grade 3 students based on age as of October 2020 (start of the school year) and used the 12 days in calculating the P-EBT benefits for each month and keep the remaining students in 18 days per month.
    - Private schools

- Estimates were calculated using the October 2020 thru April 2021 files submitted by each school. VI DHS used April 2021 data to estimate May 2021.
  - The highest estimated monthly issuance is \$ 1,671,014.11 for the month of December 2020.
    - The estimated total amount issued to school children in SNAP household is \$ 824,705.63.
    - The estimated total amount issued to school children in non-SNAP household is \$ 846,308.48.
  - The lowest estimated monthly issuance is \$ 1,502,639.89 for the month of April 2021.
    - The estimated total amount issued to school children in SNAP household is \$ 741,985.88.
    - The estimated total amount issued to school children in non-SNAP household is \$ 760,654.01.
  - The estimated total issuance for October 2020 thru May 2021 period is \$ 12,861,292.61.
    - The estimated total amount issued to school children in SNAP household is \$ 6,347,585.67.
    - The estimated total amount issued to school children in non-SNAP household is \$ 6,513,706.94.
- The upper-bound estimates for P-EBT for children in childcare (non-school SNAP children):
  - Using the SNAP eligibility system, a one-time payment to cover the P-EBT period for children in childcare will be issued to the eligible non-school SNAP children.
    - Each eligible non-school SNAP child will get \$ 143.46 per month.
      - 18 days \* \$7.97 daily totals = \$ 143.46
    - For the October 2020 thru May 2021 P-EBT period, a child can receive less than 8 months of P-EBT benefits depending on the child's start of SNAP eligibility or the child's end of SNAP eligibility. No child will receive more than 8 months of benefits. For this P-EBT period, the maximum benefit a child can receive is \$ 1,147.68.
      - \$143.46 \* 8 months (October 2020-May 2021) = \$ 1,147.68.
    - Total P-EBT for children in childcare: \$ 4,547,108.16.
      - \$ 1,147.68 \* 3,962 estimated non-school SNAP children.
- Estimated total issuance of \$ 17,660,142.17
  - One-time snack supplemental issuance of \$ 251,741.40.
  - Estimated total benefits \$ 12,861,292.61 for school children.
  - One time issuance of \$ 4,547,108.16 for non-school SNAP children.
- The estimated total *number* of children to which the State will issue P-EBT benefits:

- Snack Supplemental (Total: 12,819)
    - 6,234 school children in SNAP households
    - 6,585 school children in non-SNAP household
  - P-EBT for school children (Total: 12,163)
    - Estimated number of school children in SNAP households is 6,004.
    - Estimated number of school children in non-SNAP households is 6,159.
  - P-EBT for children in childcare (non-school SNAP children)
    - Upper-bound estimate on the number of non-school SNAP children is 3,962.
- The estimated total amount of administrative funds the USVI needs to complete the work will be provided on the 366A.
  - The P-EBT issuance schedule
    - Snack supplemental benefits for August 2020 and September 2020.
      - Students who are receiving the snack supplement for August and September 2020 will receive the payment in June 2021.
    - P-EBT for school children (SNAP and Non-SNAP)
      - Initial and ongoing P-EBT issuances:
        - The initial P-EBT multi-month issuance will be staggered over several issuance days. Benefits for October 2020 thru March 2020 will be issued in June 2021.
        - Benefits for January 2021 thru May 2021 will be issued in July 2021. These issuances will be staggered throughout July 2021.
    - P-EBT for children in childcare (non-school SNAP children)
      - Eligible non-school SNAP children in childcare will receive their one-time payment in July 2021.

#### 4. P-EBT for School Children

##### 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 2020-2021, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? 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), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- 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.

**Response:**

To identify the eligible school children and confirm their eligibility, USVI will use data provided by the VI Department of Education (VIDE) and by the administration of each eligible private schools. The U.S. Virgin Islands School Food Authority offers all meals at no

costs to students of all public and selected private schools in the territory via the Community Eligibility Provision. All students attending public and private schools who participate in the National School Lunch Program, are eligible to receive free breakfast, snack, and lunch.

A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school. Each school will be required by the VI Department of Human Services to track a student's learning mode (i.e., remote, hybrid or fully in-person) and provide a monthly school file.

Learning modes are defined as:

- In-Person Learning mode: The student is attending school in-person 100% of the time.
- Virtual Learning mode: The student is attending school in a 100% remote learning mode.
- Hybrid Learning mode: The student is attending school any combination of in-person and virtually.

A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. USVI intends to leverage simplifying assumptions to issue one amount for fully virtual students. For students who participate in a hybrid mode, the amount will be calculated based on the actual number of days the students are participating virtually (See Benefit Level section for more details). The actual number of days is provided by the school.

Every student will go through a duplicate check routine to ensure the student only receives one P-EBT benefit per month. The duplicate routine matches the SSN and Date of Birth or Last Name, First Name and Date of Birth.

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

- US Virgin Islands Department of Education (VIDE) as well as eligible Private Schools are responsible for confirming student's eligibility for P-EBT by monitoring and collecting student learning mode classifications.
- US Virgin Islands Department of Human Services (VIDHS) is responsible for the administration of the P-EBT program to include processing files received from school entities, sending files to FIS for benefit issuance, notifying clients and general public about the P-EBT process, issuing replacement cards and operating Customer inquiry center.
- Fidelity Information Services (FIS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and notification on how to use the card to new recipients, and provision of customer service and support.



## 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 the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- 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:**

USVI will identify, confirm, and monitor the status of individual students through monthly reporting from VIDE and private schools. The Department of Human Services will provide written guidance to VIDE and private schools regarding the P-EBT eligibility criteria, student classification, and the reporting requirements. Most public and private schools that were confirmed P-EBT eligible through the approval of our August-September 2020 P-EBT plan have still not resumed fully in-person instruction. Schools operating fully in-person would have eligible students if any students opted into fully remote learning.

P-EBT eligible VI schools will be required to track the learning mode for each student (fully remote, fully in-person or hybrid) and attendance records. All students in a fully remote or hybrid learning mode will be eligible for P-EBT. Schools will monitor any changes in each student's instruction mode and submit update-to-date information to VIDHS monthly. USVI will be issuing benefits retroactively so no under or over issuance is expected.

Please see the USVI's intended use of the simplified assumptions outlined in the "Benefit Levels" section.

## 5. P-EBT for Children in Child Care

### *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 received SNAP benefits at any time since October 1, 2020.
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?
- 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 childcare facility is closed or is operating with reduced attendance or hours, or
  - the child's childcare 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 childcare 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 childcare 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 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:**

Per the guidance, USVI will assume all children under the age of 6 (as of October 2020) to be enrolled in a covered childcare facility.

USVI will assume all eligible non-school SNAP children under the age of 6 are in the area of one or more schools that is closed based on the information from VI Department of Education. The VI Department of Education has announced only K thru Grade 3 will move to hybrid learning mode. The rest of the students remain in 100% virtual learning until the end of the school year. Since there is at least one public school for every zip code or city in the USVI, USVI will assume that the residence of these eligible non-school SNAP children is in the area of at least a closed public school or a public school operating with reduced attendance or hours.

USVI will identify non-school SNAP children and confirm their eligibility by using the SNAP eligibility system called CARIBS. Through this system, USVI will be able to determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements.

USVI plans to issue one-time payment to cover the October 2020 thru May 2021 P-EBT period.

USVI will identify the following non-school SNAP children eligible to receive P-EBT benefits using these simplified assumptions:

- All SNAP-enrolled children under the age of 6 as of October 1, 2020, that received SNAP benefits anytime from October 2020 thru May 2021. These eligible SNAP-enrolled children will receive P-EBT benefits during the months they received SNAP benefits.
- Once the child is determined eligible for P-EBT benefits, the child will remain eligible thru May 2021, even if the child turns 6 after October 2020, except when the child is removed from the SNAP household or when the SNAP case closes, then the P-EBT benefits will terminate on the last month of SNAP eligibility.
- Every child found eligible will go through a duplicate check routine to ensure the child will only receive one P-EBT benefit per month. The duplicate routine matches the SSN and Date of Birth or Last Name, First Name and Date of Birth.
- Since these eligible non-school SNAP children are in the area of at least one public high school that is 100% virtual, these eligible children will receive full virtual benefits. The 100% virtual number of days which is 18 days will be used in calculating the benefits.
- Due to the difficulty of verifying children's enrollment in a childcare facility, USVI will exclude children aged 6 in October 2020 and not attending school.

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

- US Virgin Islands Department of Human Services (VIDHS) is responsible for the administration of the P-EBT program to include determining the eligible non-school SNAP children from the eligibility system, sending files to FIS for benefit issuance,

notifying clients and general public about the P-EBT process, and operating Customer inquiry center.

- Fidelity Information Services (FIS) is responsible for the issuance of P-EBT benefits.

**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 2020-2021. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

**Notes:**

1. Lunch rates include the 7 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
- Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- 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:**

**P-EBT for School Children**

Based on the October 2020 thru April 2021 school files already received by the VI Department of Human Services and the information from VIDE and the private schools, USVI is proposing the following benefit level:

- The Virtual Learning Mode benefit amount will be calculated using an average of 18 days per month. This average number of days was calculated using the total number of instructional days and number of school months provided by VIDE and private schools.
  - Public schools
    - 161 instructional days
    - 9 school months
    - 161 divided by 9 = 17.88 days

- Private schools
  - Average 178 instructional days
  - 10 school months
  - 178 divided by 10 = 17.80 days
- Benefit amount calculation per child per month:
  - 18 number of days \* \$ 7.97 daily total = \$ 143.46
- The Hybrid Learning Mode benefits will be calculated using the actual number of days the student attended virtually. Due to the difference on the number of days the students attended virtually, USVI decided to use the actual number of days indicated on the private school files and from the information provided by VIDE.
  - Public schools
    - Based on the information provided by VIDE starting March 2021 until the end of school year, K thru Grade 3 will attend school virtually 12 days a month. Students are divided into 2 groups and each group attends in-person twice a week and virtually 3 times a week.
    - Benefit amount calculations per child per month:
      - 12 number of days \* \$7.97 = \$ 95.64
  - Private schools
    - Based on the school files received from October 2020 thru April 2021, majority of the private schools moved to hybrid beginning February 2021. The number of days the student attended virtually ranges from 3 days to 12 days per month.
    - Benefit amount calculations per child per month:
      - Number of days provided by school \* 7.97.

**P-EBT for Children in Childcare**

USVI will make a simplifying assumption that the residence of these eligible non-school SNAP children is in the area of at least one public school that is 100% virtual, then these eligible non-school SNAP children will receive full virtual benefits. The average of 18 number of days per month will be used in the calculation of benefits.

- Benefit amount calculations per child per month:
  - 18 number of days \* \$ 7.97 daily total = \$ 143.46

## 6. 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:**

USVI is proposing the following timeline and benefit issuance schedule:

June 2021

- Week of June 14<sup>th</sup>
  - State Plan is approved.
  - Request FIS to submit Customer Authorization.
  
- Week of June 21<sup>st</sup>
  - Approval of FIS Customer Authorization.
  - DHS contractor to implement P-EBT program changes.
  - DHS contractor to inform FIS the issuance schedule and expected number of records and benefit amount.
  - Public awareness campaign commences.
  
  - Process October 2020 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.
  
- Week of June 28<sup>th</sup>
  - Process November 2020 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.
  
  - Process December 2020 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.
  
  - Process August and September 2020 Snack Supplemental
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.

July 2021

- Week of July 5<sup>th</sup>
  - Process January 2021 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.

- Process February 2021 P-EBT benefits for SNAP and Non-SNAP students
- File transfers to EBT processor, FIS. Benefits available on cards on the same day.
- Generation and mailing of notices.
- FIS to mail cards of new students/recipients.
  
- Process March 2021 P-EBT benefits for SNAP and Non-SNAP students
- File transfers to EBT processor, FIS. Benefits available on cards on the same day.
- Generation and mailing of notices.
- FIS to mail cards of new students/recipients.
  
- Week of July 12<sup>th</sup>
  - Process April 2021 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.
  
  - Process May 2021 P-EBT benefits for SNAP and Non-SNAP students
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.
  - FIS to mail cards of new students/recipients.
  
- Week July 26<sup>th</sup>
  - Process one-time issuance of P-EBT benefits for non-school SNAP children for period October 2020 thru May 2021.
  - File transfers to EBT processor, FIS. Benefits available on cards on the same day.
  - Generation and mailing of notices.

The draw/spend priority will be P-EBT first, then SNAP and DSNAP

The Territory intends to follow the same distribution model utilized in previous implementation of P-EBT. Current SNAP households will receive their P-EBT benefits on their SNAP EBT card. Previous non-SNAP P-EBT recipients will receive their P-EBT benefits on their unique P-EBT card. New non-SNAP P-EBT recipients will receive benefits on a newly issued P-EBT card mailed directly from the EBT vendor, FIS.

VI will continue to use FSPEBT code which was modified specifically for P EBT. VI will utilize the same expungement rules that is used for SNAP for PEBT.

Undeliverable cards will be returned to the SNAP Issuance offices on the islands of St. Croix and St. Thomas. Cards will be logged, and the student's name provided to the call center for customer service and outreach purposes.



Previous P-EBT recipients will not automatically receive a new card. Lost, damaged, or stolen cards can be replaced over the counter, by the EBT Technician once the parent/legal guardian is identified in the school file and presents an acceptable photo ID.

## 7. 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.

- 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 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 Spring and Summer of 2020, 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:**

The USVI will continue to utilize and publish the (340) 772-7120 number to address customer concerns, provide information or to resolve disputes or issuance errors. Several personnel will be available to answer calls routed to this number and who will be empowered to research and address cases. Additionally, a specific email/inbox was created internally at DHS where clients may forward issues or disputes. A dedicated team will monitor this inbox and problem solve issues utilizing the records provided by the school districts. In instances where the employee is unable to locate a child in their records, the family will be referred to their respective schools where issues of eligibility can be more easily determined.

The USVI will provide access for individuals who speak Haitian Creole and Spanish to report their concern. Based upon the issue reported, the USVI will refer the customer to a specific contact at VIDE or private school, to submit or resubmit updated information as part of the verification process.

The USVI will conduct a public information campaign to alert those receiving benefits, and how it is to be used via press releases print and electronic media, radio, commercials, social media, Office of the Governor, VI Department of Human Services and Department of Education websites.

P-EBT recipients will receive information which will include:

- a. Description of P-EBT
- b. Explanation of benefit amount.
- c. Benefit expiration date
- d. Clarification that benefits are not transferrable and that households should destroy cards if they wish to decline the benefits.
- e. How to use the card and their benefits
- f. Replacement cards
- g. FIS customers services
- h. For non-SNAP P-EBT recipients, directions on how to PIN their card will be added.

## **8. Over-issuance of P-EBT benefits**

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.

### **Response:**

VI confirms expectations regarding benefit over issuances. VI will not attempt to reclaim any PEBT benefits by reducing a household's SNAP benefit. VI will research any cases or inquiries that are brought to our attention where perhaps custody recently changed or guardian or custodial parent status changes. If the benefit has already been spent, there is no further action will be taken. If the eligible child has not received the benefit, a P-EBT card will be reissued for the student. Households will be given clear information that if guardian or custodial information changes, they are responsible for returning the card to the agency. Failure to do so could result in formal action to recoup benefits

## **9. Benefit Issuance Reporting**

The Territory 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, for the period of performance October 1, 2020 through September 30, 2021. 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.

The Virgin Islands will be requesting Administrative Funding in alignment with the requirements for submitting a P-EBT Budget Plan using the FNS-366.

## **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**

USVI will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

## **13. Administration of State P-EBT Plan**

The Territory 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  
Natalie Bailey, Administrator  
VI Department of Human Services



Signature  
Kimberley Causey-Gomez, Commissioner  
VI Department of Human Services

**Date of Request: 16 June 2021**