

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School, 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:

The date range covered by this State Plan for children in school is from September 1, 2022 through June 30, 2023. The state commits to informing USDA of any significant increase or decrease in these data points during the date ranges covered by this initial plan.

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).

The estimates of P-EBT issuance during the date range coverage period are as follows:

- Monthly issuances of \$22,629
 - Estimated monthly amount issued to school children in SNAP households is \$11,860
 - Estimated monthly amount issued to school children in non-SNAP households is \$10,767
- Total issuance of \$271,543.28 (monthly estimate multiplied by the months in the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$142,316
 - Estimated total amount issued to school children in non-SNAP households is \$129,200

The estimated total number of children to which the State will issue P-EBT benefits is approximately 8,299.

- Estimated number of school children in SNAP households is 4,080
- Estimated number of school children in non-SNAP households is 4,219

Rhode Island's tentative P-EBT issuance schedule is as follows:

- School children in SNAP households: 2/3/2023 (September); 2/10/2023 (October); 2/24/2023 (November); 3/3/2023 (December); second week of month for ongoing issuances
- School children in non-SNAP households: 2/3/2023 (September); 2/10/2023 (October); 2/24/2023 (November); 3/3/2023 (December); second week of month for ongoing issuances

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 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:

Rhode Island will identify children who are eligible for free or reduced-price meals for the school year 2022-2023 by leveraging its existing data share agreement with the RI Department of Education (RIDE).

SFAs handle the meal benefit application process at the local level.

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.

Meal benefit applications have been distributed, collected and processed according to standard regulatory process. The only children eligible for free or reduced-priced meals are those determined eligible by application, children that are directly certified at the start of this school year, and/or children who attend a school operating a Special Provision that extends free meal benefits to all children enrolled.

RIDE will collect monthly attendance data from each school district in Rhode Island, including private and charter schools, that contains the demographic information for each student eligible for free or reduced priced meals. The file will include the number of days that child is entitled to P-EBT based on the student's learning mode:

1. Quarantined/out of school for COVID-19 related reasons
2. Fully virtual learning status
3. Hybrid learning status

Once a school has been closed or operating with reduced attendance/hours for 5 consecutive days one time, a student is eligible for P-EBT benefits on any subsequent day that they did not receive a meal at school. Additionally, the child is eligible for benefits for those 5 consecutive days.

Quarantined/out of school for COVID-19 related reasons

RIDE will provide monthly attendance data to DHS which will indicate whether or not a child is temporarily out of school due to COVID exposure/quarantine. RIDE/DHS will use the following definition provided by USDA for school closure:

Any absence where the school directs students to stay home for a COVID-related reason. As long as students are home at the school's direction, and the school is acting out of "concern" about COVID. then these are P-EBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school's or the state's protocol for managing COVID outbreaks, positive tests, potential exposure, etc. USDA will not second-guess any state or school that directs students to stay home for COVID-related reasons.

Schools are specifically providing a list of any student that was under quarantine due to COVID policy (i.e. exhibiting symptoms, close contact, etc.) for the benefit month. General absences continue to be reported through RIDE's electronic data collection system but RIDE has requested separate and specific reporting related to students under quarantine due to COVID exposure and/or symptoms; these are the only students that are being considered as potentially eligible for P-EBT benefits during the 22-23 school year, outside of those students who are learning in a fully virtual or hybrid learning model due to COVID-19.

In RI, when a student is placed in quarantine due to COVID-19, the time out of school varies. Therefore, RI plans to use student-level attendance data provided by the school districts to RIDE with the number of days a child is absent from school due to COVID. Students will receive P-EBT benefits based on the actual number of days that are absent for COVID-related reasons.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning mode and/or quarantine status from the prior month is captured before issuing benefits. RIDE will request that the school districts provide any updates to a child's learning mode/COVID-related absence prior to the file being sent to DHS. RI DHS's eligibility processor

will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

The school related attendance data provided by RIDE will be the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility. Using up-to-date attendance data from the school districts and the private schools will ensure that benefits will not be issued to school year 2021-2022 graduates and other non-students and that new students are captured as well.

Fully Virtual Learning Status in NSLP Participating Schools

A small number of students will be attending school on a fully remote/virtual schedule in Rhode Island. These students will receive benefits for each day that they have been learning virtually after the five consecutive day threshold has been met at their respective school. This threshold will only be required to be met one time. This threshold will be identified through the monthly attendance data submitted to RIDE by individual school. Once the minimum threshold has been met, students will be eligible to receive benefits for any day where the school is closed or operating with reduced hours and/or attendance. The amount of benefits received each month will be based on the amount of school days in the respective month based on RI's school calendar for SY2022 – 2023.

Demographic information for eligible students will be sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance. For SNAP participants, the P-EBT benefit will be added to the household's current EBT card. For non-SNAP households that have previously received P-EBT benefits, benefits will be added to the household's existing P-EBT card. For non-SNAP households that are newly eligible for free or reduced priced school meals, a new P-EBT card will be mailed to the household.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning status from the prior month is captured before issuing benefits. RIDE will request that the school districts provide any updates to a child's learning mode prior to the file being sent to DHS. RI DHS's eligibility processor will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

The school related attendance data provided by RIDE will be the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility. Using up-to-date attendance data from the school districts and the private schools will ensure that benefits will not be issued to school year 2021-2022 graduates and other non-students and that new students are captured as well.

Hybrid Learning Status

At this time, there are no schools in Rhode Island offering a hybrid learning option for their students. Should a school offer a hybrid learning schedule, once the school has experienced reduced attendance or hours for 5 consecutive days, RI will issue benefits based on the actual number of days a hybrid learner is virtually learning each month.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning mode from the prior month is captured before issuing benefits. RIDE will request that the school districts provide any updates to a child's learning mode prior to the file being sent to DHS. RI DHS's eligibility processor will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

School districts will be required to report to RIDE any significant changes in learning schedules, and RIDE will share this information with RI DHS. Collecting this data on a monthly basis and issuing benefits retroactively for the previous month will mitigate the need for school districts to report changes on a frequent basis. However, districts will be asked to report any significant changes for the previous month to RIDE before the issuance file is sent to RI DHS.

Students in non-NSLP Fully Virtual Institutions and Homeschooled Students

Rhode Island will utilize an application process to identify virtual school and homeschool students that may be eligible to participate in P-EBT based on previous attendance at a NSLP participating school and free or reduced-price meal eligibility. RI DHS, in conjunction with RIDE, will issue a press release and include messaging on its websites regarding the eligibility requirements for this population. The press release will clarify that P-EBT benefits are only available to a narrow subset of children who are enrolled in a fully virtual institution or began homeschooling since the January 27, 2020 start of the pandemic due to concerns about COVID-19. Potentially eligible students will be directed to complete an application developed by DHS and RIDE available on the DHS website with a July 31, 2023 deadline for submission.

The application form will include a portion to be completed by the parent/guardian and a portion to be completed by the school district where the child previously attended school. The form will ask parents/guardians to input the reason for disenrollment and whether the child is home schooled or attending virtual school. The application will also ask the parent/guardian to attest to their household income and number of individuals living in the household and sign the form. The form will also direct the parent/guardian to have the school district where the child was disenrolled to complete the second half of the form and, if the child is enrolled in virtual school, they would also need to submit proof of enrollment. The form asks the school district to confirm if the student was enrolled in the district sometime between January 2020 and the present date, and the date child disenrolled from public school.

For children that did not start school until after the start of the pandemic and were never enrolled in a school that participates in the National School Lunch Program (NSLP), the parent/guardian will not be required to have their neighborhood school district fill out the second page of the application. Instead, they may send the application form directly to DHS. If the child is attending a virtual school, the parent/guardian will provide DHS with proof of enrollment. Additionally, the parent/guardian will be required to provide proof of the child's identity. Acceptable forms of proof include the following:

- Birth certificate
- Immigration or Naturalization Documents
- Hospital Birth Record
- U.S. Passport
- Any other documentation that may be used to verify identity

Families would complete the application form, get the required signatures and then submit the application and income documentation directly to the EBT Coordinator at DHS via mail, email or fax (information provided on the application). The EBT Coordinator will then review the form and supporting documents and determine eligibility based on the information provided. If the parent/guardian attests that the student left the NSLP participating school for COVID-related reasons and the family is participating in SNAP, or if the student is participating in RI Works/TANF, the student will be deemed automatically eligible after DHS verifies the household's eligibility within its eligibility system. Similarly, the application will ask for the name of the school that the child would have attended this school year if not for the child's enrollment in a virtual school or in homeschooling. If this is a Special Provision school, then the child will meet the P-EBT eligibility requirement for free or reduced-priced meals. For those that do not meet the above criteria, the EBT Coordinator will compare the income information and documentation provided by the parent/guardian to the eligibility standards for free or reduced priced meals to make a determination of eligibility

DHS will use the documentation provided by households with their applications to verify the eligibility of the first 100 applicants.

- b. If the error rate for this first 100 is at or below 5 percent, DHS will review and verify the documentation for 10 percent of remaining applications.
- c. If at any time, the error rate rises above 5 percent, DHS will resume verifying the documentation for all applicants.

Applications will be processed in the order in which they are received. For those students that are deemed eligible, the EBT Coordinator would create a ticket for the eligibility vendor to issue the benefits.

RI will not be utilizing any simplifying assumptions for this plan.

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: [please use as much space as needed]

Since the demographic file will come directly from the school districts to RIDE and then to RI DHS/the eligibility processor on a monthly basis and benefits will be issued retroactively, RI DHS will be better able to track any changes in school operating status, duration of closure, reduced hours or reduced attendance. The file provided by the schools will capture information relating to the required 5 consecutive days of reduced hours or attendance.

Schools that offer hybrid or fully virtual learning will be required to report to RIDE any significant changes in learning options and RIDE will share this information with RI DHS. Collecting this data on a monthly basis and issuing benefits retroactively for the previous month will mitigate the need for school districts to report changes on a frequent basis. However, districts will be asked to report any significant changes for the previous month to RIDE before the issuance file is sent to RI DHS.

For hybrid scenarios, where a school is experiencing reduced attendance or hours, all qualifying students will receive a monthly benefit based on the actual number of days children in hybrid learning statuses are learning virtually.

RIDE will provide monthly attendance data to DHS which will indicate whether or not a child is temporarily out of school due to COVID exposure/quarantine. In RI, when a student is placed in quarantine due to COVID-19, the time out of school varies. Therefore, RI plans to use student-level attendance data provided by the school districts with the actual number of days a child is absent from school due to COVID to determine the P-EBT benefit amount. When an absence is COVID-related, students will receive P-EBT benefits based on the actual number of days that are absent for COVID-related reasons.

A small number of students will be attending school on a fully remote/virtual schedule will receive benefits for each school day that they have been learning virtually. The amount of these students will receive each month will be based on the amount of school days in the respective month based on RI's school calendar for SY2022 – 2023. Similarly, eligible students attending a non-NSLP fully virtual school or who are homeschooled will receive benefits for each school day based on RI public school calendar for SY2022 – 2023.

At this time, RI will not be utilizing any simplified assumptions. Based on information provided by the school districts to RIDE, RIDE will reassess the learning model each school is utilizing at least every two months. Using this information, RI will account for potential new hybrid learning models, school closures and longer quarantine periods to assess if additional simplifying assumptions are needed. If significant changes occur, RI then work with FNS and update this plan to adjust the benefit amounts, as needed.

The school related attendance data provided by RIDE will be the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility. Using up-to-date attendance data from the school districts and the private schools will ensure that benefits will not be issued to school year 2021-2022 graduates and other non-students and that new students are captured as well.

5. 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:

Students will be issued benefits equal to the federal reimbursement rate for a breakfast and a lunch for school year 2022-2023, as specified by USDA. The benefit is multiplied by the number of school days that the eligible child did not receive a free or reduced-price meal at the school due to the school's closure or reduced attendance or hours. In Rhode Island the daily per-child benefit is \$8.18.

Rhode Island will utilize the application process described in section 4 to identify children eligible for P-EBT that are attending non-NSLP virtual schools or who are home schooled. For all other students, Rhode Island will identify children who are eligible for free or reduced-price meals for the school year 2022-2023 by leveraging its existing data sharing agreement with the RI Department of Education (RIDE).

RIDE will collect monthly attendance data from each school district in Rhode Island, including private and charter schools, that contains the demographic information for each student eligible for free or reduced priced meals. The file will include the number of days that child is entitled to P-EBT based on the student's learning mode:

1. fully virtual in NSLP school
2. hybrid or
3. quarantined/out of school for COVID-19 related reasons

Quarantined/out of school for COVID-19 related reasons

RIDE will provide monthly attendance data to DHS which will indicate whether or not a child is temporarily out of school due to COVID exposure/quarantine. RI will use student-level attendance data provided by the school districts with the number of days a child is absent from school due to COVID.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning mode and/or quarantine status from the prior month is captured before issuing benefits.

The school related attendance data provided by RIDE to DHS/the eligibility system vendor will be the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility. Using up-to-date attendance data from the school districts will allow for accurate, up-to-date benefit amounts based on the actual number of days a child is absent due to COVID-19.

Hybrid Learning Status

Rhode Island a benefit amount based on actual number of days a hybrid student is learning virtually each month once a school has experienced reduced attendance or hours for 5 consecutive days. If needed, Rhode Island will update its plan if more schools introduce a hybrid learning option and simplifying assumptions are needed. School districts will be required to report to RIDE any significant changes and RIDE will share this information with RI DHS. Collecting this data on a monthly basis and issuing benefits retroactively for the previous month will mitigate the need for school districts to report changes on a frequent basis. However, districts will be asked to report any significant changes for the previous month to RIDE before the issuance file is sent to RI DHS.

RIDE will request that the school districts provide any updates to a child's learning mode prior to the file being sent to DHS. RI DHS's eligibility processor will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

Fully Virtual Learning Status in NSLP Participating Schools

Students learning on a fully virtual schedule will receive benefits for each day that they have been learning virtually after the five consecutive day threshold has been met at their respective school. Students will be eligible to receive benefits for any day that the school is closed or operating with reduced hours and/or attendance. The amount of benefits received each month will be based on the amount of school days in the respective month based on RI's school calendar for SY2022 – 2023.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning status from the prior month is captured before issuing benefits. RIDE will request that the school districts provide any updates to a child's learning mode prior to the file being sent to DHS. RI DHS's eligibility processor will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

Students in non-NSLP Virtual Schools and Home School Students

If determined eligible for P-EBT via the application process, these students will receive benefits for each school day of each month of the school year based on Rhode Island's 2022 – 2023 school calendar. Benefits will be provided on a monthly basis according to the issuance schedule for NSLP participating students.

6. 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:

Day(s)	Activities
0	USDA approves the State's plan
2	RIDE provides student data for September & October to RI DHS
4	Public notice campaign begins
5 - 7	Dry run for match files, Notices issued to SNAP and non-SNAP households
8	State review of match results and executive approval
10	Case maintenance file sent to EBT processor to set up cases in their system, retrieve EBT card details for non-SNAP individuals from EBT processor, non-SNAP print file received, printing and mailing (if necessary) of P-EBT cards to non-SNAP families
11	Production run for RIDE match process and September issuance to school age SNAP individuals
16	Case maintenance file sent to EBT processor to set up cases in their system, retrieve EBT card details for non-SNAP individuals from EBT processor, non-SNAP print file received, printing and mailing (if necessary) of P-EBT cards to non-SNAP families
17	Production run for RIDE match process and October issuance to school age SNAP individuals

Distribution of Benefits:

Benefits may be distributed on a SNAP EBT card or a unique P-EBT card depending on whether the child is part of a SNAP household. In most instances, children who receive SNAP benefits will have their P-EBT benefit issued on their SNAP EBT card.

If a child received their P-EBT benefit on their EBT card in the last school year and their household no longer receives SNAP, their P-EBT benefits for the 2022 – 2023 school year will be issued on their SNAP EBT card.

In most instances, children who do not receive SNAP benefits will have their P-EBT benefit issued on a P-EBT card.

If a child received their P-EBT benefit on a P-EBT card in the prior school year and they now receive SNAP, their P-EBT benefits for the 2022 – 2023 school year will be issued on their existing P-EBT card.

EBT Benefit Type:

Existing EBT benefit types will be used for both SNAP and non-SNAP households. These benefit types are FS01 and FS02. Although they are existing benefit types, they are not currently active/used for any other purpose. These are the same benefit types utilized for the previously approved P-EBT issuances.

Benefit Spend Priority:

For current SNAP households, P-EBT benefits will have the first spend priority.

Expungements:

Expungements for both SNAP and non-SNAP households will occur according to the normal SNAP expungement rules.

Returned Mail:

P-EBT cards that are returned in the mail will be handed as follows:

1. The EBT processor/FIS sends DHS the usual daily card status report with the card numbers for the returned cards marked as “undeliverable”
2. DHS EBT Coordinator creates a “returned mail” ticket in JIRA
3. Deloitte researches the eligibility system to determine if another address exists
4. If an alternate address is available, the EBT Coordinator cancels the card, generates a new EBT card number, updates the information in the JIRA ticket. Deloitte will generate a new print file with updated details and send to FIS to print and mail to the new address. If no alternate address is available, no further action is taken.

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. As per the current process:

1. The EBT processor cancels the card
2. RI DHS and the eligibility system vendor is alerted about the replacement request and manually reprints the file for the EBT processor
3. The file is sent back to the processor and the processor will print and mail a new card.

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.

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 (for example, documentation of learning status from the student’s school, verification of address of the student). 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. We do not use social security numbers as part of our match process with RIDE, nor will they be 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 participants

Both SNAP and Non-SNAP participants will receive a mailing with the following information

- A description of P-EBT
- Instructions for PINing the P-EBT card
- 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
- Instructions for destroying the card, if they want to decline benefits
- Information regarding a hotline and the DHS website with frequently asked questions
- Phone number for the EBT processor for replacement card requests

8. 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 RIDE file, 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 DHS will follow the normal overpayment recoupment rules and processes, as outlined in DHS's approved Claims Management Plan. DHS will also complete the over-issuance spreadsheet provided by USDA and submit any identified overpayments to 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, 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.

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. 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:

F02160C5319E46D

Signature
Jessica Patroli, Coordinator, Child Nutrition Programs, RIDE

Date of Request: 10/20/2022