

**State Plan for Pandemic EBT
Summer 2023
February 16, 2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Summer 2023
Document ID:	
Z-RIN:	
Date of Issuance:	February 16, 2023
Replaces:	N/A
Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

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

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

1. **State:** South Carolina

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

3. **Executive Summary:**

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

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

State’s Response:

South Carolina will adopt the U.S. standard benefit amount of **\$120** for K-12 school children. Estimated amount of P-EBT benefits issued to K-12 school children for the 2022-23 Summer period: **\$63,000,000**

Estimated number of K-12 school children receiving 2022-23 Summer P-EBT: **525,000**

South Carolina’s issuance for 2022-23 K-12 Summer P-EBT is tentatively scheduled as follows:

22-23 Summer P-EBT issuance	August 14, 2023*
22-23 Summer P-EBT issuance (newly eligible)	September 22, 2023*
<i>*All estimated issuance dates are contingent on the timely recipient of eligibility data from SCDE.</i>	

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

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

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

- The South Carolina Department of Social Services (DSS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards, replacement cards, and notification to recipients.
- The South Carolina Department of Education (SCDE), in collaboration with the local school districts, is responsible for confirming eligibility determination including the direct certification process and the NSLP application process; the monitoring and collecting of student enrollment; and provision of customer service and support, to include but not limited to, responding to questions regarding P-EBT eligibility determination.

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced-price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced-price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

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

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

State's Response:

All PK-12 students that are approved for free/reduced meals or enrolled in a CEP school will be submitted by SCDE to DSS for P-EBT Summer PK-12 issuance. SCDE will use the state-wide student information system, PowerSchool, for identification of public school students eligible for the 2022-2023 P-EBT Summer program. SCDE will provide DSS with a list/roster of potentially eligible PK-12 public school children. Potentially eligible students are identified as actively enrolled in an NSLP and/or SBP public school at some point during the last 20 days of school, or having graduated at the end of the year, and identified as eligible for free or reduced meals; or enrolled in a public CEP school or CEP alternative program.

For students identified as newly eligible (i.e., students who attended an NSLP school and direct certified after 06/01/2023, but prior to 08/15/2023 or submit Free and Reduced-Price Meal Program applications after 06/01/2023, but prior to 08/15/2023) benefits will be paid retroactively during the September 2023 issuance cycle. PowerSchool, SCDE’s statewide student information system, and nutrition software is shut down at various times over the summer to prepare for the start of the new school year. SCDE cannot pull accurate data for students during this time. All School Food Authorities will be instructed to continue accepting meal applications throughout the summer months. Free and Reduced-Price Meal Program applications received between June 1, 2023 and August 15, 2023 will be processed on or before August 30, 2023. Due to federal reporting requirements, untimely delivery of P-EBT eligibility data from SCDE may result in postponement or forfeit of an issuance cycle. The state will make every effort to issuance all 2022-2023 Summer K-12 P-EBT benefits by September 30,2023.

5. Benefit Levels

Summer 2023 P-EBT Benefit

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

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

6. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states’ ability to report and USDA to maintain accountability for P-EBT.

- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.
- How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue **new** P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

State’s Response:

Major Milestone	Estimated Completion Date
22-23 K-12 Summer P-EBT Plan Approved	05/01/2023
Public notice campaign begins	05/08/2023
SCDE data delivery to SCDSS	07/07/2023
Open P-EBT Address Portal	07/14/2023
SCDSS send demographic and benefit issuance files to EBT vendor	08/14/2023
SCDE data delivery to SCDSS – Newly Eligible	09/15/2023
SCDSS send demographic and benefit issuance files to EBT vendor	09/22/2023

- The State will issue all P-EBT benefits on a **new/unique** P-EBT cards (based on previous defined P-EBT card design from previous P-EBT iterations) to all children (SNAP and non-SNAP) eligible to receive 22-23 K-12 Summer P-EBT benefits.
- The State will continue to use the previously defined benefit type (DSEP) established with our EBT Vendor to distinguish P-EBT benefits from SNAP and D-SNAP issuances.
- P-EBT benefits will **not** be added to active SNAP EBT cards; therefore, the draw/spend priority definition is not applicable. However, P-EBT benefits will follow the same expungement pattern (270 days) as defined for the SNAP program.
- Returned or undeliverable EBT cards will be returned to Conduent and the information will be relayed back to DSS for reconciliation purposes. For families whose P-EBT card may be lost, damaged or returned, a replacement card requests will be completed via the Conduent Call Center or via email to the PEBT Benefits email box.

7. Customer Service

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

- How will the state resolve dispute or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the state’s public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

State’s Response:

- A P-EBT card along with a notice explaining the P-EBT program will be mailed to the household based on the mailing address listed in the SCDE data. Each eligible child will receive a P-EBT card.
- Basic EBT usage information will be supplied on a “buck slip” that will be included in the distribution of the P-EBT card. The buck slip will include information such as how to PIN the card, what can be bought with P-EBT benefits, what to do if a household does not want the P-EBT benefit, and how to contact EBT Customer Services.
- DSS and SCDE will include information on both agency websites including a brief description of P-EBT, eligibility, frequently asked questions, and instructions for parents who believe their child is currently eligible for free or reduced-price meals and did not receive a P-EBT benefit.
- Each agency will continue to use the predefined email/inbox where households may forward questions and concerns and will have staff dedicated to monitoring and tracking the resolution of constituent inquiries. All eligibility issues, questions and concerns, will be handled by student’s school district with oversight provided by SCDE. Questions and concerns related to P-EBT card issuance (to include replacement cards), card access, and timeframes for receiving P-EBT cards will be handled by DSS.
- In instances where DSS is unable to locate a child in their records, the family will be referred to their respective school district where issues of eligibility will be determined.
- Students not included in original benefit data files provided by SCDE or determined to be eligible for P-EBT benefits at a later date, will be referred to their respective school district for verification of eligibility and inclusion in subsequent “newly eligible” benefit data file. This process will ensure proper, automated, issuance of P-EBT cards.

- DSS and SCDE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with each school district's homeless liaison to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. School districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement. Families will need to sign an attestation that they received the card and at the end of the distribution period the school district will be required to submit to DSS the signatures and any cards that were not picked up. DSS will continue the collaboration with the Child Welfare Safety and Permanency Division that was established during the first round of P-EBT informing the Office of Economic Services of address/location updates for foster children.
- Public Awareness Campaign: The state will conduct a public information campaign through the use of websites (www.dss.sc.gov and www.ed.sc.gov) and social media platforms. South Carolina intends to issue a press release in English and Spanish to target state-wide and local news organizations. The state will work with schools and community organizations to push out template emails, robo-calls and text messages.

8. Over-issuance of P-EBT benefits

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

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, states should develop P-EBT-specific rules and procedures and include those in their state plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the state's own administrative data. ***Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a state's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. states that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the state may attempt to recover benefits or reduce a future issuance.*** Under no circumstances may the state reduce a SNAP benefit to settle a P-EBT claim.

Finally, the states recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold state agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your state will manage P-EBT payment errors.

State's Response:

P-EBT issuance data is not kept within the state's SNAP eligibility data. Due to being cost prohibitive, the state does not intend on implementing a recovery plan for duplicate/over-issued P-EBT benefits. Initial precautions will be executed prior to benefit issuances to

prohibit the issuance of duplicate/overpayment payments, including cross referencing SCDE student eligibility data against previous P-EBT issuance based on the student's name, date of birth and state student ID number to prevent duplicate P-EBT issuance. In addition, students included in the State's Child Welfare Safety and Permanency Division will be identified and manually validated to ensure the most recent address information is available to ensure proper delivery of P-EBT benefits. However, if identified, P-EBT payment errors will be handled on an individual basis. Any collection of a P-EBT payment error will only extend to the amount of remaining P-EBT funds (if available) at the time the payment error has been discovered. The state will inform USDA FNS of any overpayment as soon the state is made aware of the overpayment.

9. Benefit Issuance Reporting

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

10. Administrative Funding

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

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

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

11. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: "Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials

administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

12. Civil Rights Statement

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

13. Administration of State P-EBT Plan

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


Reminder

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

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



Amber Gillum, Deputy State Director, Office of Economic Services
South Carolina Department of Social Services


Ellen Weaver, Superintendent
South Carolina Department of Education

Date of Request: 04/11/2023