

**State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022**

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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) 2021-2022. (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:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

State Plan for Pandemic EBT

Children in School and Child Care, 2021-2022

1. State: Kentucky

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 childcare (addressed in amendment)
- 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 childcare (addressed in amendment)
- 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 childcare (addressed in amendment)
- 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 childcare (addressed in amendment)

Response:

Kentucky (KY) proposes to build off its previously approved P-EBT plan for SY 2021-2022, inclusive of the summer period. The date range for this amendment is September 1, 2021 through May 31, 2022 and is applicable to CACFP children only.

¹The 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 2021 through June 2022, for example).

Most KY public and private schools have returned to in-person instruction however, they are fluidly responding to COVID-19 outbreaks through quarantines and temporary closures with virtual instruction as necessitated by infection rates and quarantines. Due to the ever-evolving nature of the COVID-19 pandemic, these estimates are not precise. Kentucky will inform USDA of any significant increase or decrease in these data points during the period covered by this amendment.

Kentucky reviewed actual data on school closures, virtual instruction, and COVID-19 related absences in the 2021-2022 school year to develop P-EBT estimates with increased confidence. The resulting estimates of P-EBT issuance during the date range coverage period are as follows:

- Estimated monthly amount issued to school children is \$1,935,460 assuming eligible students impacted by quarantine/closure during the 2021-22 school year is approximately 47% of Kentucky's total eligible student population of 580,000. 272,600 students over the 2021-22 school year, each averaging 5 eligible P-EBT days in at least one month of the 9 month period, for a total benefit of \$35.50.
 - Estimated monthly amount issued to school children in SNAP households (35% of \$1,935,460) is \$677,411
 - Estimated monthly amount issued to school children in non-SNAP households (65% of \$1,935,460) is \$1,258,049
- Total issuance of \$17,419,140 (total monthly estimate of \$1,935,460 multiplied by 9 months in the 2021-2022 school year)
 - Estimated total amount issued to school children in SNAP households is \$6,096,699
 - Estimated total amount issued to school children in non-SNAP households is \$11,322,441
- The estimated total *number* of school children to which the State will issue P-EBT benefits is approximately 272,600 (distinct annual student count)
 - Estimated number of school children in SNAP households (35% of total) is 95,410.
 - Estimated number of school children in non-SNAP households (65% of total) is 177,190.

Child Care Estimates

Estimated total amount issued to child care children in SNAP households is \$12,754,800.

- Estimated total amount issued to child care children in SNAP households for the period of September 2021 thru December 2021 is \$5,660,800.
- Estimated total amount issued to child care children in SNAP households for the period of January 2022 thru May 2022 is \$7,094,000.
- The estimated total number of child care children to which the State will issue P-EBT benefits is approximately 40,000.

4. P-EBT for School Children (see Q&As #6-24)

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. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals²? 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 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.

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.

Response: [please use as much space as needed]

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

- The Kentucky Department of Community Based Services (DCBS), in collaboration with Kentucky Department of Education (KDE), is responsible for the planning, coordination, policy development, and monitoring of the P-EBT program. DCBS is also responsible for development of primary communications regarding P-EBT (i.e. website, partner toolkits, social media).
- DCBS is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.
- KDE collaborates with local public-school districts to address pandemic-related initiatives for students. The department oversees eligibility determinations for free or reduced meal benefits for students participating in the National School Lunch Program (NSLP) application process, determining Community Eligible Program (CEP) schools, the reporting of student enrollment, and attendance data. KDE also provides P-EBT related technical support to school districts, communicates with education leaders and stakeholders, and provides valuable support to DCBS to ensure overall program integrity, equity, and inclusion.
- DCBS will work with its EBT processor, Fidelity Information Systems (FIS), KDE, school districts, and other stakeholders to ensure a successful P-EBT program, timely implemented, with realistic expectations.

Kentucky will use data provided by KDE to determine each student's free/reduced meal eligibility. As schools collected school meals applications from all interested households at the beginning of the current school year in order to reset all children's eligibility for free and reduced-price school meals, Kentucky will not apply prior year free or reduced-price meal eligibility to the 2021-2022 school year. Monthly, KDE will provide DCBS with an electronic file of all students eligible for free or reduced-price meal benefits. The file will contain the minimum necessary data elements to issue benefits in accordance with USDA guidance and the processes described in this plan. Monthly, KDE will remove data for students no longer enrolled in a KY school, as well as students who moved from a CEP school and no longer receive free meals via direct certification or an approved free/reduced meals application. KDE will provide current school and household information for all students who are eligible for free or reduced-price meals by way of the aforementioned avenues. DCBS will match KDE's file to student attendance records monthly to confirm eligibility for P-EBT.

All of Kentucky's public and private schools who administer the NSLP record individual student attendance and nearly all track individual absences due to COVID-19. However, Kentucky schools do not use a common student attendance coding system and data collection methods vary greatly among the state's nearly 200 distinct school districts. Due to varying data collection methods among Kentucky's diverse school districts, automatic P-EBT enrollment is more challenging for the 2021/22 school year. DCBS will collect data from each public and private school district using an Absence Tracking Template to accurately provide P-EBT to all eligible students. The Absence Tracking Template collects State Student ID, date of birth, number of days absent/virtual due to COVID-related reasons, and school enrollment data for each applicable month. Authorized school personnel will complete the data template to verify each

student's COVID-related incident during each month of the 21-22 school year. Schools will be instructed to list only students who were not **physically present** in school due to COVID-related reasons on the data sheet. DCBS will match entries on the Absence Tracking Template to the month-specific free/reduced meal eligibility data provided by KDE to confirm P-EBT eligibility monthly. Schools that do not specifically track COVID-related absences will be instructed to list only students with 5 or more consecutive excused missed school days and to provide the monthly number of excused absences for each student. In the event a student missed fewer than 5 school days, a reconsideration must be requested by calling DCBS. The Absence Tracking Template will confirm a student's P-EBT eligibility for the 21-22 school year.

All eligible students (SNAP recipients and non-SNAP recipients) will receive P-EBT benefits for the actual number of applicable days through an automated process.

Kentucky will monitor for outliers in COVID-related absences as the data is received and processed. If any large discrepancies are detected, DCBS will reach out to the location to inquire and verify that the data recorded and submitted is accurate.

The State recognizes that students enrolled in full virtual academies that are ineligible to participate in the NSLP are not eligible for P-EBT and therefore will not be included. NSLP enrolled students 1) receiving virtual instruction or 2) who are absent due to COVID-19 conditions will be eligible for benefits equal to the number of school days they were in virtual instruction, absent and/or quarantined. If a student is no longer NSLP eligible or withdraws from school during the month, benefits will be based on the period of time the child was eligible for that month (enrolled, NSLP free/reduced recipient, and absent for COVID-related reasons). DCBS will request school administrators to provide student enrollment and attendance records no later than the 10th of May 2022 and will utilize the data to issue benefits. Benefits will be issued retrospectively on or about the 25th of May and will continue to be issued on or around the 25th of each month through August 2022 or longer if needed to allow districts ample time to report 21-22 attendance data.

- All students who were P-EBT eligible during the months of September-December 2021 and/or January-February 2022 will receive P-EBT benefits on or around May 25, 2022.
- All students who were P-EBT eligible during the months of March-May 2022, as well as students enrolled in schools who had not previously reported data to DFS, and students who request reconsiderations due to underreported initial data will receive P-EBT benefits on or around June 25, 2022.
- All students who were P-EBT eligible during any months of the 21-22 School Year and enrolled in schools who had not previously reported data to DFS, and students who request reconsiderations due to underreported initial data will receive P-EBT benefits on or around July 25, 2022.
- All students who were P-EBT eligible during any months of the 21-22 School Year and enrolled in schools who had not previously reported data to DFS, and students who request reconsiderations due to underreported initial data will receive P-EBT benefits on or around August 25, 2022.
- Depending on the volume of data to be processed during each system run, the dates above may be compressed to more frequent issuances.

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.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response: [please use as much space as needed]

Kentucky will identify, confirm, and monitor the status of individual schools and students through reporting from school districts. Confirmation of absence/quarantine status will be collected through school reports interfacing with the state's integrated eligibility system (IEES). The State will use student attendance records from the 2021-22 school year to confirm schools have met the 5 consecutive days of school closure or reduced attendance/hours. DCBS and KDE will provide guidance to each district regarding the classification of a student's attendance and completing the Absence Tracking Template. Schools operating fully in-person will have eligible students if the student meets the requirements in section 4.A., Eligible Students.

Kentucky schools will be asked to record student absence/virtual learning due to a COVID-related incident on the Absence Tracking Template. DCBS will collect the reports to determine each COVID-related occurrence for each student. A free/reduced meal eligible student's P-EBT benefits will be issued based on their school's report of the number of days the student was

absent and/or participating in virtual instruction due to COVID-19 each month. A school will be considered to have met the 5 consecutive day requirement by way of reduced attendance if one or more students are in quarantine and/or virtual instruction for 5 or more consecutive days as reflected in their attendance record. Schools will submit this information via reports to DCBS.

5. P-EBT for Children in Child Care (see Q&As #25-33)

Standard for P-EBT Eligibility

A child enrolled in a covered childcare facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered childcare facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered childcare facility.)
3. During a public health emergency designation, the child's childcare 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? (See Q&A #29)
- 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 how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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: [please use as much space as needed]

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

Roles & Responsibilities: • The Department for Community Based Services (DCBS) will be responsible for identifying children ages 0-5 currently receiving SNAP and ensuring the child has not already received P-EBT for school age children in the same month. • The Kentucky Department of Education (KDE) and DCBS will work together to identify areas of coverage areas/proximity to school buildings

Identifying SNAP Enrolled Children

- The state will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP. *[See P-EBT Q&A #28 for additional detail.]*
- The state understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- The state will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits.

DCBS will cross-reference this population with any children submitted by KDE to ensure a given child does not receive duplicate benefits. P-EBT school benefits will overrule childcare benefits in the event of an overlap until the end of the program. SNAP eligible children will be issued P-EBT childcare benefits beginning the month of SNAP eligibility not to exceed May 2022. Childcare P-EBT benefits will only be issued to children who were SNAP recipients during the month of retro issuance. A child will only receive P-EBT for the month(s) he or she was an active SNAP participant. Benefits will be issued to each eligible child as one payment for all eligible months no later than December 31, 2022.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year through **May 2022** relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, the state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state's lunch claims for the fall semester.

- The state will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

Setting Benefit Levels Using the CACFP Data Method

- The state will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using **the following three factors:**

Fall semester benefit:

- i. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.
- ii. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: **180 ÷ 9 = 20** days per month.
- iii. The school year 2021-2022 P-EBT benefit per day of \$7.10

Spring semester benefit:

1. The spring semester benefit will be calculated as above, but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state's anticipated distribution of spring semester P-EBT child care benefits in **January 2022**, the state will have access to spring 2022 CACFP claims data through **May 2022** and will use the reduction in claims through that month to calculate the first factor.
2. Before calculating its monthly spring P-EBT benefit, the state commit to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CCACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Table 1: Reduction in CACFP lunch claims – fall semester

Fall Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
September 2019	588,643	September 2021	435,979	
October 2019	685,933	October 2021	466,155	
November 2019	563,507	November 2021	457,966	
December 2019	540,363	December 2021	425,765	
Total	2,378,446	Total	1,785,865	

Table 2: Reduction in CACFP lunch claims – spring semester

Spring Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester: To be applied to daily rate and number of school instructional days per month.
January 2020	645,676	January 2022	378,822	
February 2020	608,316	February 2022	435,848	
March 2019	664,170	March 2022	581,155	
April 2019	699,729	April 2022	537,640	
May 2019	704,078	May 2022	558,651	
Total	3,321,969	Total	2,492,116	-25.0%

Average monthly P-EBT child care benefit, fall and spring semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in School plan	Number of Months in Semester	Daily Benefit Amount	Monthly Benefit
Fall Semester	24.9%	20.00	4	\$7.10	\$35.00
Spring Semester	26.1%	20.00	5	\$7.10	\$37.00

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

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-2021-07-16/pdf/2021-15107.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: [please use as much space as needed]

Kentucky is using its experience in administering P-EBT during the 2020-2021 school year to better inform its 2021-2022 benefit issuance strategy. As earlier stated, local control governs the details which are developed or adjusted based on need in response to COVID-19 conditions through structured processes within the school districts. Due to varying policies concerning COVID-related absences among Kentucky's school districts, consistent rules of closure/mandatory quarantine/virtual instruction do not exist, and individual student data collection is necessary.

- In the event an individual student does not agree with the number of P-EBT eligible days reported by their school, a reconsideration can be requested by the parent/guardian for review and verification. The reconsideration request is entered by DCBS staff in IEES at the time of contact with the DCBS Call Center. Call Center staff will read the following information to the requestor and obtain verbal consent prior to submitting the reconsideration for review.

*“I certify (promise) that all information on this application is true and that the dates specified in my application are days that my child did not attend school in person for a **school-approved COVID-related reason**. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws.”*

- The reconsideration action submitted by Call Center staff generates a task to specialized P-EBT staff who, upon review and verification from school personnel, will approve or deny the request. If approved, benefits equivalent to the number of additional eligible days x \$7.10 will be issued to the student’s P-EBT account. To ensure benefit determination/issuance accuracy, Kentucky will issue benefits retrospectively as outlined in 4-A.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 2020-2021, 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 2020-2021. 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 2020-2021, 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 PEBT 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 PEBT card?

Response: [please use as much space as needed]

Key milestones within the tentative timeline for implementing the 2021-2022 P-EBT program are listed below. The issuance schedule may change from that described below depending on when the State Plan is approved and when system updates are ready for deployment.

The tentative timeline for initial implementation in SY 2021-2022 is as follows:

Day 0 – Plan approval is received

Day 1 – Inform school systems of the reporting criteria and Absence Template instructions (Discussions and information on anticipated approach and expectations will occur in advance)

Day 14 – Finalize system requirements to update P-EBT system in accordance with SY 2021-2022 approved State Plan approach

Day 15 – Initiate P-EBT system updates (planning, scheduling, coding)

Day 47* – File transfers from KDE to DCBS confirming free/reduced price meal eligibility

Day 55* – System readiness complete (coding, testing, production)

Day 55* – Public awareness campaign commences

Day 75* – File transfers to EBT processor FIS

Day 76* – Benefits deposited for both non-SNAP and SNAP households

*Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

Kentucky intends to issue P-EBT benefits for September 2021-March 2022 retrospectively beginning in May 2022. The feasibility of a May 2022 implementation is dependent on State Plan approval and stakeholder and system readiness. KY will update USDA if there are significant changes to the approved issuance schedule. KY will provide benefits in monthly issuances on or around the 25th of each month. This date was chosen due to the availability of other food assistance benefits and as a result of lessons learned from the 2020-2021 P-EBT program and consultation with stakeholders.

The typical monthly timeline for issuances is as follows:

Day 1 – Start of month

Day 14* – Deadline for schools to submit student files or update individual records via online interface for September-December 2021 and January-February 2022

Day 15* – File transfers from KDE to CHFS

Day 24* – File transfers to EBT processor FIS

Day 25* – Social media post informing on issuance

Day 25* – Benefits are deposited for both non-SNAP and SNAP households

*Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

The tentative timeline for child care implementation 2021-2022 is as follows:

Day 0 – Plan approval is received

Day 45– Finalize system requirements to update P-EBT system in accordance with SY 2021-2022

approved State Plan approach

Day 46 – Initiate P-EBT system updates (scheduling, coding)

Day 55* – System readiness complete (coding, testing, production)

Day 55*– Public awareness campaign commences

Day 75* – File transfers to EBT processor FIS

Day 76* – Benefits deposited

*Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

KDE will provide DCBS with a data file of all free/reduced price meal eligible students for applicable months. By the 10th day of each month, school districts will provide data for students who were quarantined or absent due to COVID-19 via an electronic file or by integrated eligibility system entry. DCBS will strive to issue P-EBT benefits by the 25th day of each month.

Kentucky intends to follow the same distribution model utilized during the 2020-2021 P-EBT plan. Kentucky SNAP households will receive P-EBT benefits on their EBT card. Non-SNAP households will receive benefits on a unique P-EBT card. New P-EBT cards will not automatically be issued to students who were previously issued a P-EBT card. Newly eligible students will be mailed benefit cards to their household address. For students whose card has been lost or damaged, DCBS has developed an online replacement card portal and will accept replacement card requests via call center assistance line. Undeliverable cards will be returned to the EBT processor, FIS, who will in-turn provide the state with information on undeliverable cards. This information will be shared with school districts for outreach purposes as needed.

P-EBT benefits will follow the same expungement rules that the state follows for SNAP. Upon notification of an administrative error or extenuating circumstance, DCBS may reissue the expired benefit to the student. Kentucky will continue to use PEBTSN and PEBTOT benefit codes, applicable to SNAP and non-SNAP P-EBT households respectively. The P-EBT draw/spend priority is first.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages States to provide a means to resolve disputes and answer 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 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: [please use as much space as needed]

Kentucky has a multi-faceted approach to ensuring robust and accurate communication to all eligible households regardless of primary language, lack of permanent address or access to technology.

The DCBS Call Center will continue to serve as front line customer support. DCBS staff has access to all P-EBT information available on the integrated eligibility system, as well as inquiry access on EBTedge to specifically investigate a child's P-EBT eligibility, benefit amount, and card issuance status.

Kentucky provides P-EBT information and answers to frequently asked questions on the DCBS website and continues to update information to streamline communication and provide clarity. Additionally, DCBS Central Office staff will maintain a P-EBT Microsoft Teams group to provide fast, accurate responses to state field staff when a caller's concerns cannot be easily resolved. In instances where DCBS is unable to locate a child in their records, the family will be referred to their student's school where issues of eligibility can be more easily determined.

The state is committed to serving all eligible children regardless of primary language. All outreach materials will be translated into Spanish. These materials will be shared with school districts, community partners, and other community organizations to distribute to families. All staff are trained to assist Limited English Proficiency (LEP) callers via a DCBS maintained translator services hotline.

DCBS will collaborate with other divisions within the department and KDE to educate and distribute P-EBT cards for students who are experiencing homelessness, including unaccompanied homeless youth, students in foster care, and students who have been identified as migrant and other students who may need the assistance of a school social worker to help ensure access to P-EBT benefits. DCBS and KDE will collaborate regularly to ensure resources are allocated appropriately and in a manner that supports program integrity.

Public Awareness Campaign: Kentucky will conduct a public information campaign through use of websites. Kentucky intends to issue a press release in English and Spanish to target state-wide and local news organizations and Senior Leadership to announce at a press conference. Similar to the 2020-2021 school year, Kentucky will create communication toolkits and will work with schools and community organizations to push out P-EBT materials in required languages (sample website copy, sample social media posts and graphics, flyers, etc.). These outreach materials will be shared with schools, community organizations, partner agencies, and other stakeholders.

9. 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.

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

Response: [please use as much space as needed]

Kentucky has considered the fact that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data and that reclaiming benefits under those circumstances would likely burden affected households. Kentucky has also considered the likelihood of recovery with respect to the costs and administrative burden for recovery. A student's information must be confirmed by multiple data matches in order to be P-EBT eligible. Kentucky will pursue P-EBT claims on a case-by-case basis when P-EBT is issued in error. When Kentucky discovers instances where a child's benefits went to the wrong household or child, CHFS will research those cases individually and issue benefits only when the state confirms that its original issuance was made in error. Kentucky will not issue duplicate benefits in cases of disputed guardianship if the state believes the original issuance was correct. Kentucky will report the dollar amount and number of students affected by any over issuances/overpayments to USDA with explanations of the cause(s) for error(s) **prior** to making corrections. Kentucky is committed to preserving P-EBT program integrity through rigorous verification of student eligibility.

10. Benefit Issuance Reporting

Kentucky agrees to complete the FNS-292 form as well as all other normally recurring SNAP

reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30, 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

12. Release of Information

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

13. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:

Marta Miranda-Straub, Commissioner
Kentucky Department for Community Based Services

Jason Glass, Commissioner
Kentucky Department of Education

Date of Request: 12/02/2021

Revised: 2/4/2022

Revised: 2/24/2022

Revised: 3/10/2022

Revised: 10/18/2022