

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022
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<b>Summary:</b>	(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:** Connecticut
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*<sup>1</sup> 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
- 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
- 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
- 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

### **Response:**

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<sup>1</sup> 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 2021 through June 2022, for example).

The date range for Connecticut's P-EBT plan is from September 1, 2021, through September 30, 2022. Benefits, however, will only be issued for school year (SY) 2021 –. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this plan.

The estimates of P-EBT issuance during the date range coverage period for SY 2021 – 2022 only are based upon best available data received in March 2022 and are as follows<sup>2</sup>:

- Monthly issuances of 1,085,569.88<sup>3</sup> (total expected number of eligible students based upon remote membership data From September 2021 – February 2022)
  - Estimated monthly amount issued to school children in SNAP households is \$238,825.40
  - Estimated monthly amount issued to school children in non-SNAP households is \$846,744.48
- Total issuance of \$10,855,698.80 (monthly estimate multiplied by the ten months – September 2021 through June 2022 – of SY 2021-2022)
  - Estimated total amount issued to school children in SNAP households is \$2,388,254.00
  - Estimated total amount issued to school children in non-SNAP households is \$8,467,444.80

The estimated total *number* of children to which the State will issue P-EBT benefits is approximately 91,750

- Estimated number of school children in SNAP households is 16,600
- Estimated number of school children in non-SNAP households is 75,150

For the P-EBT childcare benefit, based on data obtained between September 2021 and March 2022, Connecticut estimates 48,726 children are eligible each month. At an estimated P-EBT benefit of \$29.91 per month, this equals:

- Monthly issuance of \$1,457,394.66
- Annual issuance of \$14,573,946.60

As the benefit amount data only covers the fall semester, Connecticut commits to inform FNS of any significant changes in expected P-EBT benefits issuance following analysis of childcare access and benefit amounts for the Spring semester.

The state intends to issue P-EBT benefits retroactively in three phases for all eligible recipients. The three phases include households receiving SNAP/TANF benefits, households receiving Medicaid benefits, and households not known to DSS. The benefit issuances are planned to begin June 2022 and will cover all of SY 2021–22.

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

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<sup>2</sup> Estimates are subject to change as school/classroom quarantines fluctuate

<sup>3</sup> The state anticipates these numbers to fluctuate based on the changing of operating status, however this was calculated based upon best available data.

## 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 meals<sup>4</sup>? 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.

## Response:

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<sup>4</sup> 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.

To identify eligible school children and confirm their eligibility, the Connecticut State Department of Education (CSDE) will utilize four student data collection systems that collect student enrollment, attendance, meal eligibility, and household address information from districts:

1. Public School Information System (PSIS) Registration: This is the 24/7 student enrollment management system. PSIS data represents the most current, statewide record of student enrollment across Connecticut. Districts update PSIS on a daily/weekly basis.
2. PSIS Monthly Membership and Attendance Collection: To track student attendance throughout the year and promote student engagement, the CSDE established a new collection to collect student-level attendance each month. Through this collection, districts report each student's number of remote learning days of membership and days of attendance for students in grades K-12 as well as co-located Pre-K students. During the 2021 state legislative session, the Connecticut General Assembly passed legislation restricting remote learning to be available in SY 2021-22 to only four COVID-19 related circumstances. Therefore, any student reported in PSIS with remote learning membership, whether "attending" or "absent" from the remote learning day, must be absent from an in-person school day due to COVID-19. Absences for any other reason are coded as absent without the presence of the remote learning membership. In SY 2021-22, remote learning days are only allowed under the following circumstances:
  - a. Students who must be in isolation due to confirmed COVID-19 infection, or who must quarantine due to close contact with a confirmed case.
  - b. In rare and individualized circumstances, students with live-in family members who have documented an unusual vulnerability to COVID-19.
  - c. In rare cases in which a Planning and Placement Team determines that in-home instruction provides the student with an appropriate education in the least restrictive environment as part of their IEP.
  - d. Should there be an order issued at some point during the 2021-22 school year that requires school district closures pursuant to an emergency declaration by the legislature or governor.

As this is the best data available to the state, and any students who are remote do not have access to meals served at school, Connecticut will utilize simplifying assumptions to provide P-EBT benefits to any qualifying student in the four categories above. These data are collected at the end of every month for the prior month. CSDE will provide all school food authorities (SFAs) with submission instructions for reporting all students with an approved application for free- or reduced-price school meals with the National School Lunch Program (NSLP), or who are directly certified, or enrolled in a Community Eligibility Provision (CEP) school who did not receive free or reduced-price meals at the school because the school was closed or has reduced attendance/hours for at least 5 consecutive days due to COVID-19.

3. **PSIS October Collection:** This snapshot collects student enrollment and meal eligibility status information (i.e., free, reduced, or not eligible) for all students from all districts as of October 1.
4. **PSIS Address and Meal Eligibility Collection:** This collection was originally established in May 2020, for the first round of P-EBT, to collect mailing addresses for students who are not directly certified by DSS for school meal benefits as well as the most current meal eligibility status for students. This collection will be conducted twice in the 2021-22 school year. It will enable the CSDE to capture students who transferred newly into the state or enrolled newly in public school.

In addition to these four collections, the CSDE also receives direct certification data from DSS on a weekly basis then matches the data with PSIS Registration to provide benefit categories and corresponding student meal eligibility information to authorized food service staff across Connecticut.

The Child Nutrition Programs Online Application and Claiming System will be used to verify schools' participation in the NSLP and SBP.

### **Eligibility Determination:**

To identify eligible school children and confirm their eligibility for P-EBT, Connecticut will utilize SY 2021-22 free and reduced-price school meals applications (as well as direct certification and enrollment in a CEP school) and the following approach:

1. SNAP-recipients:
  - a. The CSDE will match its school enrollment database (PSIS Registration) with the direct certification data for the school year to identify all students who are eligible for SNAP in the school year.
  - b. The CSDE will leverage simplifying assumptions to determine the eligibility of students for P-EBT benefits. The SNAP-eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-EBT in a given month will receive the appropriate benefit amount as described below under Section 6, Benefit Levels.
2. Non-SNAP Directly Certified Recipients:
  - a. The CSDE will match its school enrollment database (PSIS Registration) with the direct certification data for the school year to identify all students who are ineligible for SNAP but are directly certified for other benefit types (e.g., TANF, Medicaid) in the school year.
  - b. The CSDE will leverage simplifying assumptions to determine the eligibility of students for P-EBT benefits. The non-SNAP-eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-

EBT in a given month will receive the appropriate benefit amount as described below under Section 6, Benefit Levels.

3. Non-SNAP and Non-Directly Certified Recipients:

- a. The CSDE will utilize the October collection and the PSIS Address and Meal Eligibility Collection to identify those students in SY 2021-22 who are not directly certified through DSS but are eligible for free or reduced-price meals through:
  - i. the submission of a household application for free or reduced-priced meals that is processed by the school; or
  - ii. enrollment in a Community Eligibility Provision school; or
  - iii. other categorical eligibility means (e.g., homeless, foster care).
- b. The CSDE will leverage simplifying assumptions to determine the eligibility of students for P-EBT benefits. The non-SNAP and non-directly certified eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-EBT in a given month will receive the appropriate benefit amount as described below under Section 6, Benefit Levels.

The CSDE will collect the same data and provide the same benefits to students attending private schools that are participating in NSLP through direct communication with the private schools.

The State plans to issue P-EBT retroactively in three distinct groups. The first group will be students receiving SNAP/TANF from DSS, the second group will be students receiving Medicaid from DSS, and the third group will be those children not receiving any benefits from DSS using the most recent data available in PSIS for determining eligibility for free or reduced-priced meals and student remote membership. Due to timing and system limitations, the issuances will include all months of SY 2021-22.

Because the state did not have an approved P-EBT plan at the start of the school year, schools will be instructed that any application approved at any point during SY 2021-22 should make the student retroactively eligible for P-EBT back to the start of the school year.

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

- The Connecticut Department of Social Services (DSS) 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 coordination of customer service and support.
- The Connecticut State Department of Education (CSDE), in collaboration with the local school districts, is responsible for identifying eligible students through the direct certification process, the free and reduced-price school meals income eligibility application process, the monitoring and collecting of student learning mode classifications, as well as verifying any reconsideration requests for accuracy.

## 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:**

The CSDE intends to use its PSIS Monthly Membership and Attendance Collection data to confirm the five consecutive day requirement has been met. While no schools in Connecticut may offer a remote learning option to students in general, with limited exceptions identified above, the CSDE data collections will be used by the CSDE to apply a simplifying assumption that, if any student is engaged in a remote learning model, or if at least one student is quarantining for a minimum of 5 days, or if a school has to reduce its hours due to the COVID-19 pandemic, the school is operating with reduced in-person attendance or hours and thus its students qualify for P-EBT benefits.



The State will then use the PSIS student-level Monthly Membership and Attendance Collection data to determine which benefit category eligible students are grouped into for the purposes of issuing P-EBT benefits.

Private schools participating in NSLP will be required to submit the same data sets described above to the CSDE.

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

### *Standard for P-EBT Eligibility*

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

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- 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 child care facility is closed or is operating with reduced attendance or hours, or
  - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- 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:**

The following two state agencies are responsible for the administration of P-EBT for children in childcare:

- Connecticut Department of Social Services (DSS) which is responsible for the issuance of P-EBT benefits, notices to customers and customer service.
- Connecticut State Department of Education (CSDE) is responsible for monitoring and collecting Child and Adult Care Food Program (CACFP) data to inform the P-EBT benefit amount and ongoing eligibility.

CSDE collects and monitors CACFP meal data served in childcare settings. Programs have 60 days following the end of each month to submit claims for CACFP meals. Connecticut proposes using the most current CACFP lunch meal data available for childcare settings to determine both whether Connecticut is able to issue childcare P-EBT benefits that month (i.e., if the 2021 data shows a decrease in the number of meals served compared to the same month in 2020) and also to set the childcare P-EBT benefit amount.

For the benefit amount, Connecticut proposes to use the percentage reduction of CACFP lunch data compared to 2019 as the basis of a childcare P-EBT benefit amount. This monthly benefit amount assumes an average 18-day monthly attendance in childcare (180 school days required each school year/10 months). Currently, CACFP data available for the 2021-2022 plan year is September through January. The average reduction for the September – December time period in CACFP lunches served by family day care homes and childcare centers (excluding at-risk lunches) is roughly 23.4%. The state will multiply this percent reduction in claims by the 18-day monthly attendance figure and the \$7.10 benefit per day to arrive at a monthly P-EBT childcare benefit. The monthly benefit for February – June will be based on the reduction in CACFP lunches for January – March 2022 compared to the sum of CACFP lunches in January-February 2020 and March 2019, which will be calculated in early July 2022.

As Connecticut plans to issue P-EBT childcare benefits after the period in which the plan covers, it commits to updating USDA prior to issuing benefits to establish:

- whether Connecticut is eligible to issue childcare P-EBT benefits based on whether the most current CACFP data available shows a reduction in the number of meals served in childcare settings compared to 2019; and
- the childcare P-EBT benefit amount based on the most recently available data.

In addition, As the data pull will occur after the SNAP monthly issuances, DSS will ensure that a child's eligibility for P-EBT benefits ends when a child's SNAP enrollment ends. For example, if a child receives SNAP benefits for the months of September 2021 – March 2022, this child will only receive P-EBT benefits for those same months. DSS will also utilize simplifying assumptions to provide benefits for children that were 5 years old on October 1, 2021 but have since turned 6 years old receive benefits for all months that they remain SNAP participants through the end of the current school year assuming they have not already receive P-EBT benefits through P-EBT for school children.

As another simplifying assumption, Connecticut proposes that for each month that CACFP data shows an overall reduction in the number of meals served in childcare settings, all children in, Connecticut under 6 years of age as of September 1, 2021, and in a household receiving SNAP benefits at any time during the plan period September 1, 2021, through June 30, 2022, will be eligible for the childcare P-EBT benefit for those months in which they received SNAP benefits. DSS will determine and confirm a child’s receipt of SNAP benefits in accordance with the relevant SNAP privacy requirements through the use of the State’s ImpaCT eligibility system.

Connecticut proposes that the State of Connecticut be considered an “area” for purposes of making the determination that one or more childcare facilities have closed or operated with reduced attendance or hours each month for purposes of determining eligibility.

Finally, the state proposes the reliance on the most recent CACFP data available which shows an approximate reduction of 23.4% in the number of lunches served compared to pre-pandemic numbers in the same month meets the reduced attendance/closure threshold requirement of five consecutive days.

## 6. Benefit Levels

<i>Standard for Benefit Levels</i>				
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
<b>Contiguous U.S.</b>	\$3.75	\$2.35	\$1.00	<b>\$7.10</b>
<b>Alaska</b>	6.03	3.78	1.63	<b>11.44</b>
<b>Hawaii, Guam, Virgin Islands, Puerto Rico</b>	4.37	2.74	1.17	<b>8.28</b>

**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:**

Students will be issued benefits equal to the federal reimbursement rate for a breakfast, lunch, and a snack for SY 2021-22, as specified by USDA. In Connecticut that daily per-student benefit is \$7.10.

For SY 2020–21, Connecticut chose to operate using a tiered approach to benefit delivery for P-EBT benefit distribution. This allowed Connecticut to quickly provide benefits to eligible students while reducing the administrative burden on the agencies tasked with administering the P-EBT program statewide.

In addition, the tiered approach allowed the state to closely tie the benefit amounts students received to their predominant learning model monthly.

After reviewing the guidance from FNS, and consistent with the USDA’s Q&A addendum issued in January 2022 outlining a three-tiered benefit based on input from several state agencies as well as reviewing the most current data set reported by the schools in the Public-School Information System, Connecticut has determined that we will again offer a three-tiered benefit approach. The most appropriate benefit levels based upon the COVID-related absence attendance data are as follows:

- For students with  $\leq 5$  remote learning days: 3 days of benefits (\$21.30)
- For students with  $> 5$  but not fully remote for the month: 10 days of benefits (\$71.00)
- For students fully remote for the month: 18 days of benefits (\$127.80) which is the average period of time a child is in school each month (180 school days / 10 months)

## **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 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:** [please use as much space as needed]

Due to current IT constraints and competing priorities, P-EBT distribution is slated to begin in June 2022 with planning beginning as soon as the proposal is approved. However, Connecticut's exact issuance schedule will be determined after plan approval and will be shared with USDA, posted on the DSS P-EBT website <https://portal.ct.gov/p-ebt>, and messaged to households and the public.

The tentative plan for SY 2021–22 benefits is as follows:

- Days 1-4:** Design review begins
- Days 5-6:** Lists of eligible students receiving SNAP/TANF/MA received from CSDE
- Days 6-27:** Card file development, testing and submission to card vendor for eligible students receiving MA that did not previously receive a P-EBT card during SY 2020–21
- Days 6-34:** P-EBT system development, testing, validation, and sign-off for eligible students receiving SNAP/TANF/MA
- Day 44:** Cards issued for eligible students receiving MA that did not previously receive a P-EBT card during SY 2020–21
- Day 45:** Distribute benefits for eligible students receiving SNAP/TANF/MA
- Days 35-36:** List of eligible students not receiving assistance from DSS received from CSDE
- Days 40-50:** Card file development, testing and submission to card vendor for eligible students not receiving assistance from DSS and who did not previously receive a P-EBT card
- Days 40-50:** P-EBT system development, testing, validation, and sign-off for eligible

- students not receiving assistance from DSS
- Day 54:** Cards issued for eligible students not receiving DSS assistance that did not previously receive a P-EBT card
- Day 60:** Distribute benefits for eligible students not receiving assistance from DSS
- Day 61-82:** P-EBT Child Care system development, testing, validation, and sign-off for eligible SNAP recipients aged 0-6 who did not receive other P-EBT benefits
- Day 83:** Distribute benefits for eligible P-EBT Child Care SNAP households

Note: schedule is subject to change based upon approval date, system development, testing and sign-off. In addition, many of the technical activities occur concurrently, so there is overlap within the timeline.

Upon successful distribution of benefits, Connecticut will begin planning for the distribution of Summer P-EBT benefits followed by catch up waves for reconsiderations as well as those students inadvertently missed in prior distributions.

Connecticut works internally, as well as consulting with its EBT and card vendors, and retailer associations to determine appropriate dates of issuance that take into account: time to clean-up and reconcile the data, transfer the data to the EBT vendor, allot appropriate internal resources to balance simultaneously issued SNAP Emergency Allotment benefits, and ensuring that P-EBT issuances do not interfere with the state's monthly issuances of regular SNAP benefits on the first three days of each month.

The state will continue its use of the SNAP subaccount codes of 9002 for SNAP households and 9003 for non-SNAP households which were specifically created for the separate tracking and payment of P-EBT benefits and differ from DSS's SNAP and D-SNAP subaccount coding.

P-EBT will be given the highest spend priority amongst all regular SNAP benefit types to ensure it is used during the period for which it was intended. P-EBT benefits will follow the same expungement rules that the state follows for SNAP.

The state intends to follow the same distribution model used in previous iterations of P-EBT. Households participating in SNAP and TFA will receive P-EBT benefits on their pre-existing ConneCT EBT cards. Households participating in Medicaid will receive P-EBT benefits on a card issued to the student's head of household as identified in the DSS ImpaCT eligibility system. Households not currently participating in the identified DSS administered programs will receive benefits on a P-EBT card in the eligible student's name.

In order to minimize administrative burden during the pandemic, new P-EBT cards will be issued to all households not receiving SNAP or TFA who were not previously issued a P-EBT card during SY 2020–21 or the subsequent Summer P-EBT distribution. To reduce costs and timeline for implementation, Connecticut will use the DSS SNAP EBT card design and will not be issuing a unique card for P-EBT benefits.

DSS will replicate the prior process for handling requests via its Benefits Center assistance line for households whose card has been lost, damaged, or was not received. DSS households whose card was not received or was lost or damaged will have a replacement card issued via standard replacement card processes in the ImpaCT eligibility system. These new cards are issued daily. Replacement card requests for non-DSS households will be sent to the DSS SNAP Unit for review. Once a correct address is obtained, the SNAP Unit adds the household to its card replacement master list. This list is sent weekly to the EBT vendor, at which time a new card is generated.

## 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:**

DSS 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. DSS's Benefits Center will continue to serve as front line customer support. Eligibility workers assigned to the Benefit Center are already familiar with the P-EBT program from the previous two school years and have direct access to the ImpaCT eligibility system to review all DSS household P-EBT cases. DSS staff can also check deposit dates and issue card replacements. In addition, these workers have access to the EBT system to review transactional data, have access to language interpreters, and there are TDD/TTY options for callers who are deaf.

For households not known to DSS through other DSS administered benefits programs, or for any other issues that cannot easily be resolved, procedures are in place for Benefit Center staff to pass the relevant information via direct email to the DSS SNAP Policy Unit for review and response. A dedicated team monitors this inbox and resolves issues using the records provided by the school districts. In instances where DSS is unable to locate a child in their records, DSS will contact CSDE for assistance



before the household will be referred to their respective school districts where issues of eligibility can be more easily determined. Once a resolution is determined either by DSS or CSDE, the information is provided to a DSS vendor to call the household back and provide the information as well as attempt to assist with additional questions. DSS and the CSDE maintain a standard P-EBT triage meeting every other week and more often as necessary to maintain consistent communication and problem solve complex cases.

DSS and CSDE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with the statewide McKinney-Vento coordinator to address issues related to students who have not received their cards due to outdated addresses or lack of permanent address. Collection of social security numbers (SSN) are not necessary to apply for NSLP, therefore students without SSNs may pursue eligibility for P-EBT through free and reduced-price school meals income eligibility applications. DSS and CSDE also have Department of Children and Families (DCF) liaisons to coordinate issues regarding foster care children.

The state is committed to serving all eligible students regardless of their primary language. Last spring the state stood up a section of their state website, <https://portal.ct.gov/p-ebt> dedicated to P-EBT. This website can be easily translated into eight different languages. Furthermore, all outreach materials are being provided in both English and Spanish.

**Public Awareness Campaign:** As noted above, the state will conduct a public information campaign using the state website <https://portal.ct.gov/p-ebt> and social media platforms including Twitter and Facebook. Connecticut also intends to issue a press release to target state-wide and local news organizations and the Governor's office will announce through its daily briefings. The state will work with CSDE to inform schools and community organizations as well as the advocate community through emails and flyers.

**Direct Communication:** As part of the first benefit issuance, all eligible P-EBT households will receive a brochure similar to what was sent during the previous iterations of P-EBT. This brochure will include an overview of P-EBT, eligibility for the program, benefit amounts, issuance dates, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions, and what to do if the household chooses not to participate. The brochure will also include information on how to PIN their card and will direct them to the DSS website for more information including Q&As. The notice is available in English and Spanish.

## **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:**

Connecticut has many lessons learned from administering P-EBT during the prior two school years and believes using the most up-to-date information available is essential to avoiding incorrect issuances. DSS and CSDE have committed extensive time and resources to updating and correcting inaccurate household addresses.

For SNAP households, the data in the ImpaCT eligibility system will be used to distribute cards, while non-SNAP households will receive cards at the address provided to CSDE by the child's school district. The state remains committed to using all available resources including the state's McKinney-Vento coordinator and DCF to ensure it has the correct address information. The state is also committed to using its resources to research and resolve issues related to custody concerns including the continued use of DSS's Fraud Early Detection (FRED) unit to investigate claims of incorrect issuance.

In instances of custody disputes, DSS will encourage households to work together, to the extent possible, to resolve the issue prior to the state taking any corrective actions.

The state commits to timely reporting to FNS should any aggregate over-issuances or improper payments occur and provide a description of the error, the number of children involved, and the value of over-issuance.

**10. Benefit Issuance Reporting**

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

**11. Administrative Funding**

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 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:**



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Signature  
Daniel Giacomini  
SNAP Program Administration Manager  
Connecticut Department of Social Services



Signature  
John D. Frassinelli  
Division Director  
Connecticut State Department of Education

**Date of Request** 3/9/2022