

**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 **ARKANSAS**

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 – August 2021 through May 2022
 - for children in child care- TBD later date
- 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. \$2,496,644.00
 - Estimated amount issued to school children in non-SNAP households \$2,838,012.00
 - Estimated amount issued to school children attending virtually. \$9,194,500.00
 - Estimated amount issued to children in private schools. \$6,816.00
 - Estimated amount issued to non-school children in child care-NA
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households 43,955
 - Estimated number of school children in non-SNAP households 49,965
 - Estimated number of school children attending virtually 7,000
 - Estimated number of private school children 120
 - Estimated number of non-school children in child care N/A
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in non-SNAP and SNAP households- August and September of 2022.
 - Children in child care-N/A

¹ The date range covered by P-EBT State plan or amendment. A State’s plan will typically cover the instructional months in the State’s school year (September 2021 through June 2022, for example).

Response:

Arkansas used the following process to determine the number of free/reduced eligible students, who might receive P-EBT benefits for school year 2021-22, due to a Covid related absence.

- Arkansas projected an additional 2,000 possible cases for remainder of the 2021-22 school year. The state is not aware of any more variants that are of concern at this point. This made a total projected number of 52,178.
- Arkansas Department of Education, Division of Secondary and Elementary Education (“DESE”) multiplied the number of Arkansas Department of Health (“ADH”) reported cases 52,178 by 3 to account for an average of probable closes contacts that were isolated/quarantined due to COVID.
- Then multiplied the 156,534 by 60%, the percentage of free/reduced eligible students reported the Agency.
- Arkansas schools reported 274,273 eligible free/reduced for school year 21-22, of those 46.8% were eligible through a direct certification match with SNAP and 53.2% were eligible through a source documents.
- The estimated benefit is based on ~~an~~ 8 days absence related to COVID multiplied by the daily rate of \$7.10 for a total estimated benefit of \$56.80
- The assumption is that approximately 93,920 free/reduced eligible students might qualify for P-EBT benefits for school year 2021-22. Of the 93,920 there are approximately 43,955 SNAP eligible students and approximately 49,965 eligible students estimated to potentially receive a P-EBT benefit for SY 21-22.

Arkansas proposes to begin distribution of P-EBT benefits as follows:

Benefit Month	Based on Data Available	Benefit Issuance Date
August 2021 – May 2022	December 2021 and May 2022	August-September 2022 (single issuance spread over two months)

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]

PUBLIC SCHOOLS:

DESE’s Child Nutrition Unit (“CNU”) administers the USDA Child Nutrition Programs for Arkansas public schools.

DESE utilizes the reporting system eSchool, which has been in use for several years. eSchool is used by school level staff (eSchool Coordinator) to enter student enrollment data at the beginning of each school year. This data includes name, address, date of birth, parents name, meal eligibility status, and instructional choice (in-person, virtual, or hybrid of in-person and virtual). The data can be updated during the school year as parents report changes, etc. to the school district. This will be used to identify students receiving virtual instruction, and therefore, without daily access to school meals. Although the data can be updated at any time, eligibility determinations for P-EBT will be made on the schedule identified on the chart on page 3. If a student is eligible for P-EBT as of this data pull date, then it is an assumption that the student is eligible for the entire period.

At the end of each school year, the student data is “rolled over” for the next school year. Graduates’ status changes from “12” for twelfth grade to “GG” for graduate. Students in the twelfth grade that do not graduate must be manually reset to grade 12. Students who transfer out of district are changed from active to inactive status with the date of withdrawal from the district. Students cannot be simultaneously enrolled in two (2) districts at the same time.

The eSchool system has been used to “match” with SNAP data for several years to provide direct certification matches to schools. eSchool identifies which students were registered as virtual and which students were registered as “on-site”. Use of the eSchool system is mandatory for all public schools and districts.

Districts do not submit classroom data to DESE; therefore, reduced hours or attendance cannot be determined past or at the grade level within a school. There is not a way to establish a predominate number of classroom closures within a grade level. The State elects not to recognize qualifying the entire grade based on a COVID related absence, for an individual classroom or student to receive the P-EBT benefit.

Arkansas’s public schools develop local policy, for reporting absences related to COVID, for enrolled students. Some districts report a student present when a classroom or a student quarantine due to COVID. Therefore, COVID related absentee data, reported to DESE, would not accurately identify eligible school children for P-EBT benefits.

Meal Eligibility Status:

In Arkansas, public schools collected and processed applications and other supporting documentation of student meal eligibility status during school year 2020-21. For the 2021-22 school year, the 2020-21 meal status rolled forward into the 2021-22 school year. Schools/Districts are encouraged to continue to process meal applications throughout the 2021-22 school year despite USDA allowing all meals to be served without charge to the

families under the Seamless Summer Option (SSO). Once a student is eligible for free/reduced meals, they are eligible for the entire school year.

Public school districts enter changes to enrollment, demographics or meal eligibility into the eSchool statewide reporting system as need arises. Within the system, eligibility status is coded 01=free, 02=reduced, 03=paid, and 04=free based on direct certification. Enrollment data is uploaded from the district to DESE each evening in the eSchool system; therefore, if a student becomes eligible during the year, it will be reflected in the statewide reporting system the day after it is entered by the district. eSchool enrollment data (including meal status eligibility) is confirmed against student meal status by the eSchool Coordinator throughout the year and is confirmed to DESE on District Cycle 2 Reporting due annually in October. This process applies to all students. Although the data can be updated at any time, eligibility determinations for P-EBT will be made the date of the data pulls on the schedule identified on the chart on page 3. If a student is eligible for P-EBT as of this data pull date, then it is an assumption that the student is eligible for the entire period.

New students and transfer students are entered into the eSchool system as part of the school enrollment process every public school and district uses in Arkansas. Meal status is part of the enrollment data collected. Although all students are served meals without charge to the families under the SSO during school year 2021-22, districts have been encouraged to continue to accept meal applications and process direct certification matches for new and transferring students. Once a student's meal eligibility status is determined as free or reduced, the student maintains that eligibility for the entire year and thus would be P-EBT eligible the entire year if in a virtual learning environment.

Meal eligibility status can transfer with the student from one school district to another. The meal eligibility status does not automatically transfer with the student transferring from one district to another, but as part of the new and transferring student enrollment process, the receiving district is encouraged to contact the district from which the student exits to receive documentation of meal eligibility status. This allows the student to "carry" the meal eligibility benefit and receive the benefit seamlessly on the first day of school at the receiving district.

Enrollment data is uploaded from the district to DESE each evening via eSchool. Therefore, if a student enrolls in a school or becomes eligible for reduced or free meal benefits during the year, it will be reflected in eSchool the day after it is entered by the district. SNAP eligibility changes are updated in the Direct Certification (D/C) portal and are available within 24 hours. In addition to the four (4) statewide direct certification matches each year, districts have the ability to check the D/C portal for individual student matches or groups of student matches at any time. Students enrolled in a school operating CEP or Provision 2 are served meals without charge to the families. Students are coded as 01=free in the statewide reporting system. eSchool data used will be as of December 31, 2021, and May 31, 2022. It is an assumption that the student's eligibility and enrollment status did not change prior to the data pull.

Arkansas believes that distribution of funds on a semester basis will maintain program integrity by decreasing errors related to multiple benefits being issued throughout the school year.

RESPONSIBILITIES:

PUBLIC SCHOOLS:

Each public-school district is responsible for:

- accurately approving 2021-22 student meal eligibility status based on source documents,
- maintaining accurate enrollment and eligibility data for all students in the eSchool statewide reporting system,
- conducting the Parent Initiated P-EBT Application process, for parents whose student may have been isolated/quarantined due to COVID
- Notifying parent of eligibility decision

STATE AGENCY – DESE is responsible for:

- notifying public school districts of the approved plan for P-EBT disbursement,
- pulling data on students’ enrollment, eligibility and instruction choice from eSchool as outlined in the approved plan,
- receiving data from districts, collected from the Parent Initiated P-EBT Application process, combine all reports from the districts and provide an initial and then regularly cadenced student data file to DHS for benefit processing.
- providing the student P-EBT data file, based on the above to AR DHS/SNAP for benefit processing meeting the following criteria:
 - Includes a full address for the student with no fields missing, including ZIP code.
 - Name of parent in two separate columns. First name should go in one column and last name in another column
 - Name of student in two separate columns, first name should go in one column and last name in another column. Add a third column when appropriate for student’s middle initial or name.
 - Include student’s date of birth
 - The exact benefit amount for the student for the time frame must be entered.

STATE AGENCY - DHS is responsible for:

- Working with internal DHS partner to obtain individuals requests for participation in PEBT from students who attend private school.
- Distributing benefits received from ADE to the eligible clients
- Creating a contact center for the purpose of handling calls from clients who need assistance with PEBT issues.
 - Non receipt of cards
 - Address changes
 - Card usage
 - Triage and routing to proper agency based on assistance needed

- Creating an informational webpage on the DHS site to inform citizens of authorized PEBT participation schools. List will be updated by DHS as eligibility is determined by ADE.
- Sending a notice to clients that DESE has deemed eligible for the program prior to the payment of benefits.

PUBLIC SCHOOL P-EBT SIMPLIFIED ASSUMPTIONS/JUSTIFICATIONS:

It is assumed there will be fewer P-EBT benefits paid in for school year 2021-22 because:

- 96% of the enrolled students have chosen in-person instruction.
- Some districts have established virtual tracks for those students who have chosen virtual instruction.
- No planned virtual days were included in any districts Ready for Learning Plans on file with the Agency.

It is an assumption that the student’s meal status eligibility and enrollment status has not changed prior to the data pull.

It is an assumption that the student’s instruction choice (in-person, versus virtual) did not change prior to the data pull.

B. School Status

<p><i>Standard for P-EBT Eligible School Status</i></p> <p>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:</p> <ol style="list-style-type: none"> 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.
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- 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:

Arkansas has 251 public school districts operating the National School Lunch Program which includes 1037 public schools for the 2021-22 school year. As noted above, all data used for P-EBT eligibility determinations will be based on retrospective data.

Arkansas public school districts’ enrollment data is uploaded to DESE each evening for every enrolled student via the eSchool reporting system. This data includes instructional choice (in-person or virtual). Schools/Districts make changes to update the eSchool system including the instructional option as often as necessary to reflect the current information.

All benefit issuances made by Arkansas will be retrospective. All P-EBT benefits issued will be issued to free or reduced eligible students only on days of virtual instruction. Benefits will begin with the next data pull date after the student becomes eligible for free/reduced meals if the student receives virtual instruction. Benefits will not be retroactive to the beginning of the school year.

All public-school districts with an approved Child Nutrition Agreement for school year 2021-22 are expected to continue providing meals for both virtual and in person students under the SSO. Schools/Districts are encouraged to continue to process meal applications and other meal status supporting documentation, including direct certification matches, during the entire school year. Meal eligibility status is one of the data elements updated in eSchool as new meals benefit determinations are established.

Data used to calculate benefit payments will be as of December 31, 2021, and May 31, 2022, see page 3 for proposed benefit period, data collection and benefit issuance proposed dates. P-EBT benefit determinations will be made as of the dates above, using the assumption that the student’s meal status eligibility and enrollment status has not changed prior to the date of the data pull.

It is an assumption that the student’s instruction choice (in-person, versus virtual) did not change prior to the data pull.

Districts do not submit classroom data to DESE; therefore, reduced hours or attendance cannot be determined past or at the grade level within a school. There is not a way to establish a predominate number of classroom closures within a grade level. The State elects

not to recognize qualifying the entire grade based on a COVID related absence, for an individual classroom or student to receive the P-EBT benefit.

Arkansas will:

- use data reported by public and private school districts to identify children who had elected a virtual learning model:
 - data will be pulled from this dataset each semester to determine whether a child’s elected learning model has changed; a child’s learning model as of the date data is pulled will be considered their learning model for the semester
 - set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.
- A Parent-Initiated P-EBT Application has been developed and provided to local school districts. Districts will communicate and provide the application to parents, wanting to apply for P-EBT benefits, for their child who was absent from school because of a COVID related isolation/quarantine. Parents will complete and return the application to the district. The district will provide the information to DESE for the processing of benefits and transmission to DHS for issuance. Benefits will be calculated based on the number of days absent due to COVID multiplied by the daily rate of \$7.10.
- issue benefits for the months of August 2021-May of 2022 in a single distribution beginning August 2022.

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:

Responsible State Agencies

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

- Arkansas DHS will mine the data based on the simplifying assumptions and will validate SNAP participation for all children who meet the criteria for all months of both semesters.
- Arkansas DHS will issue benefits based on the number of months that the children were on SNAP in both semesters.
- Arkansas DHS will use the SNAP eligibility file for child-care to compare to the files received from DESE in the school program to avoid duplication of benefits.

Identifying SNAP Enrolled Children

- The state will identify children who began school year 2021-2022 under the age of six (6) and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of six (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 five-year-old earlier in the 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.

- The state understands that a child’s eligibility for P-EBT childcare 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 childcare benefits.

Establishing a Reduction in Access to Childcare 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 March 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 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. A combined single issuance will be distributed. The averages are calculated using the **following three factors**:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.
2. 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: $[178] + \{JO\ months\} = [17.8/ \text{ days per month}]$. This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.
3. 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 childcare benefits in **August 2022** the state will only have access to spring 2022 CACFP claims data through **March 2022** and will use the reduction in claims through that month to calculate

the first factor. If April 2022 CACFP data is available to use for the August 2022 distribution, it will be included in the spring benefit calculation.

2. Before calculating its monthly spring P-EBT benefit, the state commits 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

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:
August 2019	659,550	August 2021	528,297	To be applied to daily rate and number of school instructional days per month.
September 2019	688,790	September 2021	574,364	
October 2019	793,680	October 2021	593,034	
November 2019	618,655	November 2021	548,149	
December 2019	591,186	December 2021	492,099	
Total	3,351,861	Total	2,735,943	-18.4%

Table 2: Reduction in CACFP lunch claims – spring semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester:
January 2020	731,413	January 2022	462,710	To be applied to daily rate and number of school instructional days per month.
February 2020	700,248	February 2022	462,993	
March 2019	701,452	March 2022	683,788	
Total	2,133,113	Total	1,609,491	-24.5%

Average Monthly P-EBT childcare benefit; Fall and Spring Semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit	Full Semester Benefit
Fall Semester	18.4%	17.8	5	\$ 7.10	\$ 23.22	\$ 116.11
Spring Semester	24.5%	17.8	5	\$ 7.10	\$ 31.02	\$ 155.11

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:

In an effort to reduced burden to school districts, streamline the processes and more easily communicate to recipients and stakeholders, Arkansas intends to utilize the following simplifying assumptions to provide a uniform benefit to all eligible students.

- Since Arkansas's school year is 178 instructional days, the P-EBT benefit level for all P-EBT eligible students enrolled in virtual instruction option, will be calculated using the following formula:

$$178 \text{ days} \times \$7.10 \text{ per day} = \$1,263.80 / 10 \text{ months} = \$126 \text{ monthly benefit August - May}$$

- The P-EBT benefit for each school will be calculated with one (1) benefit amount to each P-EBT eligible student enrolled receiving in-person instruction whose school transitions from in-person to virtual instruction to mitigate risk of exposure to COVID or because of increasing COVID infection rates.

$$\text{Number days} \times \text{daily benefit} = \text{benefit paid}$$

An example: Students are out for 10 days: $10 \times \$7.10 = \71 benefit paid

Arkansas seeks to apply the following simplifying assumptions:

Data reported by each school district in eSchool, at the local level will be used to determine benefit levels. A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to school meals. A student's instructional option will determine their access to school meals and determine the P-EBT benefit level. Private school participants will receive benefits based on the same formula.

It is an assumption there will be less P-EBT benefits paid in for school year 2021-22 because:

- 96% of the enrolled students have chosen in-person instruction.
- Some districts have established virtual tracks for those students who have chosen virtual instruction.
- No planned virtual days were included in any districts Ready for Learning Plans on file with the Agency.

It is an assumption that the student's eligibility and enrollment status has not changed prior to the data pull.

It is an assumption that the student's instruction choice (in-person versus virtual) did not change during prior to the data pull.

Districts do not submit classroom data to DESE; therefore, reduced hours or attendance cannot be determined past or at the grade level within a school. There is not a way to establish a predominate number of classroom closures within a grade level. The state elects not to recognize qualifying the entire grade based on a COVID related absence, for an individual classroom or student to receive the P-EBT benefit.

Arkansas's public schools develop local policy, for reporting absences related to COVID, for enrolled students. Some districts report a student present when a classroom or a student quarantine due to COVID. Therefore, COVID related absentee data, reported to DESE, would not accurately identify eligible schoolchildren for P-EBT benefits.

A Parent-Initiated P-EBT Application was developed and provided to local private and public school districts. Districts will communicate and provide the application to parents, wanting to apply for P-EBT benefits, for their child who was absent from school because of a COVID related isolation/quarantine. Parents will complete and return the application to the district. The district will provide the information to DESE for the processing of benefits. Benefits will be calculated based on the number of days absent due to COVID multiplied by the daily rate of \$7.10.

Arkansas will:

- use data reported by public and private school districts to identify children who had elected a virtual learning model:
 - data will be pulled from this dataset each semester to determine whether a child's elected learning model has changed; a child's learning model as of the date data is pulled will be considered their learning model for the semester
 - set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.
- A Parent-Initiated P-EBT Application has been developed and provided to local school districts. Districts will communicate and provide the application to parents, wanting to apply for P-EBT benefits, for their child who was absent from school because of a COVID related isolation/quarantine. Parents will complete and return the application to the district. The district will provide the information to DESE for the processing of benefits and transmission to DHS for issuance. Benefits will be calculated based on the number of days absent due to COVID multiplied by the daily rate of \$7.10.
- issue benefits for the months of August 2021-May of 2022 in a single distribution beginning August 2022.

The chart on page 3 outlines the benefit period, data collection date and proposed benefit issuance date.

Benefit calculation for students enrolled in Arkansas public schools will be dependent on:

- the school's operation of the National School Lunch/School Breakfast Program,
- the student's meal eligibility status is free or reduced (or the student is enrolled in a school operating under CEP or Provision 2),
- the student's selected instruction option.

For example:

- A free/reduced eligible student enrolled in the virtual instructional option would receive the P-EBT benefit for each instructional day of the month.
- A free/reduced eligible student enrolled in the in-person instructional may apply for P-EBT benefits by submitting a Parent Initiated P-EBT Application. This application was developed and provided to local school districts. Districts will communicate and provide the application to parents, wanting to apply for P-EBT benefits, for their child who was absent from school because of a COVID related isolation/quarantine. Parents will complete and return the application to the district. The district will provide the information to DESE for the processing of benefits. Benefits will be calculated based on the number of days absent due to COVID multiplied by the daily rate of \$7.10.

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 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households? All Non-SNAP households will receive a plain white card with PEBT embossed on the card for each child.
- 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. PEBT sub benefit type will be used.
- 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. PEBT is first 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. SNAP expungement rules. PEBT follows normal expungement rules.
- 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? Cards that are designated as returned will not be reissued until contact is made with the household to ensure integrity and card receipt.
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Non-SNAP individuals get new cards and SNAP households have benefits added to current card.
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Milestone	Day	Narrative
Address Update Messaging to School Districts	-30 through +90 ongoing	<ul style="list-style-type: none"> A 3-week deadline is given for first update completion
DHS posts social media information on PEBT	-30 through +90 ongoing	
Draft Plan to FNS	May 23,2022	Expediting feedback loop
Signed plan to FNS	After response to feedback complete	Before June 15
USDA approves plan	0	
Public notice campaign-strategic Tuesday	Best Tuesday after plan approval but before issuance begin date.	Governor, with DESE and DHS officials. (Tentative)
DHS submits contract amendment with processor	-30 to -15	Legislative review
Contact Center Opens	Prospectively September 1, 2022	
Issuance	File sent to EBT 8/15/2022	7-15 day turnaround for mailouts
clean up issuances	File sent to EBT 10/15/2022	7-15 day turnaround for mailouts
Clean up issuances continue	Files sent from 10/1/2022 through 09/30/2023	7-15 day turnaround for mailouts
Contact Center closes	March 1,2023	May be extended month to month if needed.

Data Pull and Benefit Issuance Proposed Date:

Benefit Month	Based on Data Available	Benefit Issuance Date
August 2021-May 2022	05/31/2022	August and September 2022

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-ADE collects and applies a homeless indicator in e-school. The homeless barrier is addressed with local workarounds through the district.
 - foster children- DHS will run a match of those in foster care from the DHS Foster Care management information system.
 - children without social security numbers-pseudo ssn's will be supplied when required
 - children with limited English proficiency, households without internet access, and people living with disabilities. Each of these barriers are addressed through current business practices and system functionality in both agencies.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
- What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that

USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:

- A description of P-EBT
 - Instructions for PIN-ing 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?

The State plans to distribute information about P-EBT to the general public through a variety of platforms – online and offline as well as earned media, including:

- Details on the program and individual school eligibility as well as frequently asked questions (FAQ) and answers will be added to dedicated pages on the websites of both the Department of Human Services (DHS) and the Department of Education (ADE).
- Information shared on digital bulletin boards in all our DHS county offices as well as all State revenue offices (where people get their driver's license)
- Specialized graphics will be deployed on Facebook, Instagram and Twitter, including one that is already running focused on encouraging clients to make sure their addresses on file are correct. We also are asking schools and districts to share these graphics on their social media channels. Future graphics for use on social media channels will focus on when the new cards will be distributed and who is eligible, and the posts will direct users to the P-EBT pages on the DHS and ADE websites for more information. We will also monitor social media comments and submitted questions, both in order to respond with accurate details and to determine if broader communications (such as a new question or the FAQ) are needed for specific topics.
- In order to increase accessibility, graphics shared on social media will include embedded text descriptions as well as information in text outside of the graphic.
- Press conference and subsequent press release detailing eligibility and timelines

- We will pursue opportunities for interviews and media appearances (broadcast, print & online) aimed at increasing awareness of the program.
- We will also create fliers that can be provided to clients or posted at DHS county offices and to ADE.
- Will provide graphics and information to all state Legislators and ask that they share information with their constituents.
- We will include a buck slip with the P-EBT cards that will provide an overview of the program and include instructions on how to activate and use the card. It will also detail the restrictions on how it can and cannot be used and include information about how violations, such as selling the card, are against the law. It will also note that the card can be cut in half by those who do not wish to receive the benefits, and it will include the call center number for additional questions.
- We also will reach out directly to P-EBT participants through an informational memo and flier that school districts will provide to parents of eligible children. These fliers will include SY21-22 eligibility information and information from the buck slip along with prominent displays of the websites and call center as routes to obtain additional information.
- The DESE Communications Team will distribute the email to local district Communication Directors.
- The DESE Family Engagement Team will distribute the email to local district Engagement Coordinators/Facilitators
- CNU will distribute the email to local Child Nutrition Directors and Superintendents.
- This process will be followed to get information to the districts, for distribution to families in their respective communities.
- A Spanish version of all graphics and fliers will be developed by DHS and shared in the same manner as the English versions.

Because of previous PEBT releases, we have a large following of eligible families on our social media accounts.

To ensure adequate customer service and triage of issues arising from the issuing of benefits to almost 100,000 individuals, DHS plans to use a contact center deployed by our current EBT contractor, Conduent. They have experience in quickly standing up contact centers similar to the one the state needs for P-EBT to ensure that calls are answered and properly handled or redirected and that emails are answered. The addition of the call center will ease the administrative burden on DHS and ~~AR-DOE~~ and will prevent some of the frustrations felt by previous PEBT clients in the first iteration.

The specifications from Conduent are included below.

STATEMENT OF WORK

PROGRAM DESCRIPTION

The Arkansas DHS Food Assistance Program is seeking a contract with a vendor to provide Customer Call Center services for the State 's (Pandemic EBT) P-EBT program during an initial fivemonth period from

September 2022 to March 2023, with the option to extend by mutual agreement a month at a time. P-EBT is a program which provides SNAP benefits to children who miss meals which would be provided to the students under the National School Lunch Program (NSLP) were the students attending school, and to children who would receive meals if they could attend day care.

TYPE OF SERVICES

The Vendor is required to support a Customer Service Help Desk which will work with The Arkansas Department of Human Services (DHS). The Vendor will receive and answer P-EBT calls that would normally be answered and handled by DHS. The vendor must offer the following customer services:

- The Customer Service Center will offer clients the ability to reach Customer Service Representatives (CSRs) Monday-Friday; 9:00 am - 7:00 pm CST.
- Clients should be able to reach the Customer Service Center via a toll-free "1-800" number.
- CSRs must monitor questions to help compile a Frequently Asked Questions (FAQs) list.
- The Vendor must provide a Customer Service contact center which meets or exceeds the service requirements listed in the Pricing section:
- The Vendor must provide CSRs to resolve client issues. The Vendor must provide sufficient CSR capacity to meet the contractual service standards for client calls. The Vendor must provide customer service to reach live representatives with a waiting period daily average of not more than five (5) minutes.
- The Customer Service Center will handle client questions related to Pandemic-Electronic Benefits Transfer (P-EBT) benefit issuance, address changes, and other questions related to Arkansas' P-EBT program. They will refer eligibility questions back to a designated number or entity set by ADE (For instance, all questions concerning eligibility for this iteration of PEBT may be referred back to the local school's to complete the application process).
- The caller's identity must be confirmed using questions agreed to and approved by the State prior to giving caller any household demographic information or requesting card cancellation/address

update/card re-issue.

- Clients requesting benefit availability date must be given the date benefits will be issued based on the issuance schedule supplied by the State.
- Clients requesting address changes must have the new address taken and submitted in a mutually agreed to format by Vendor to DHS to have the address updated.
- The Vendor must supply a mutually agreed to electronic mechanism to track, monitor and resolve all address changes and allotment disputes so that it can be communicated clearly to DHS what issues need to be resolved to ensure proper and timely distribution of P-EBT benefit.
- The Vendor must be able to assist clients in handling allotment dispute issues including determining if the caller's school and/or school district participated in P-EBT using data provided by the State. If the caller appears to have been eligible for P-EBT then their information will be documented and passed to the State. Callers where the school did not participate will be referred to their local school district.

Reporting Requirements

Monthly reports must be generated which will provide DHS with the following information. This list is not intended to be a comprehensive list:

- Number of Daily Calls Received
- Number of Calls Resolved by the Call Center
- Number of Calls Referred To DHS
- Number of Calls Referred to DESE
- Addresses to Be Updated By DHS
- Number of Benefit Disputes Logged
- Average Wait Time for Calls to Be Answered
- Average Time on Calls

Call Center Assumptions and Service Requirements

1. Average Speed to Answer: 5 Minutes

- 2. Average Handle Time (Calls} 10 Minutes
- 3. Full Time Equivalent Hours Per Week: 40 Hours
- 4. Inbound Call Volume: 16,000 Calls Per Month

Transaction Type	Summary	Estimated Quantity
Inbound Calls	FTE's	26
Non Production Staff	FTE's	4
TOTAL	FTE's	30

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.

Response:

DHS is exploring how best to utilize the existing overpayment claim establishment and collections process to account for P-EBT overpayments. Necessary procedural changes are available to account for this new population of overpayment and identification of the type of SNAP overpayment, as well as the responsible party(ies) for the overpayments.

For instances where overpayments occur due to system error or other assignment errors the benefit may be recouped by DHS for that case if readily available. If the benefit has been spent, the case may be referred to the DHS Office of Accounts Receivable and Collections.

P-EBT benefits will not be reclaimed by reducing the household's SNAP benefits.

DESE validates all data and provides only students that are qualified for P-EBT based on household application for free or reduced-price meals and identified student categories per USDA guidance and regulation. The data provided to DHS will be students that have been determined eligible for the P-EBT benefit by DESE. We also will link the student ID to the benefit record, the case and student file so we are able to determine payment integrity. In determining the benefit amount for each child, DESE will use the methodology as outlined in the benefit section. A test issuance will be performed and quality checks reviewed before issuance is authorized for a production run.

By using retrospective issuance and file transmission that have been adequately deduplicated, DHS and ADE expects to avoid over issuance in most cases.

Underpayments: DHS will accept underpayment claims from parents and guardians to research and resolve for children not paid or partially paid for a given month during the program through a simple request (appeal) process made to the contact center and other request modalities. Claims will be either for full payment or partial payment for a given month. Monthly benefits levels are set at the district level by DESE. DESE will verify with local school districts and advise DHS whether claims should be confirmed or denied. Children must be on the DESE student-file for this process or will be referred to the local school to turn in a NSLP free and reduced lunch application. If the school learning plan for the month(s) and subsequent access flag in question supports the claim, DHS will issue the difference in lump sum or subsequent issuance cycles until the program ends.

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 and Education 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 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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

14. Administration of State P-EBT Plan

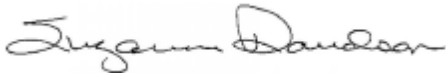
The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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



Mary Franklin, Division of County Operations Director, AR DHS

Signature
Print Name and Title



Suzanne Davidson, Director Child Nutrition Unit AR DESE/CNU

Signature
Print Name and Title

Date of Request 05/23/2022
Childcare 06/24/2022