

**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 :** Georgia

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).

Response: The Georgia Department of Human Services (DHS) proposes to provide a P-EBT benefit for child care for School Year (SY) 2021-2022. The P-EBT plan for SY 2021-2022 will incorporate new revisions issued by the Food and Nutrition Service (FNS) to the operating procedures for eligibility determination, household data transfer, and benefit issuance. This P-EBT plan will be split into multiple issuance cycles identified as Cycles 1, 2, and 3. Benefits will be issued in these cycles as indicated in the subsequent pages of this plan.

a. The **date range** covered by this State plan:

- Children ages 0-6 in **child care:** Benefit issued for August 2021 through May 2022

b. Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range.

- Total monthly amount of P-EBT benefits for SY 2022 anticipated by the state is \$7,528,224.65 and total amount of P-EBT benefits for SY 2022 anticipated is \$75,282,246.45
- Estimated amount issued to school children in SNAP households.
 - N/A
- Estimated amount issued to school children in non-SNAP households
 - 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).

- Estimated amount issued to non-school children in childcare
 - $(254,633 * 5 * 29.81) + (254,633 * 5 * 29.32) = \$75,282,246.45$
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - N/A
 - Estimated number of school children in non-SNAP households
 - N/A
 - Estimated number of non-school children in child care
 - 254,633

Summary Table: Upper Bound Estimates

Child Care Calculation	Non-School Children in Child Care	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	Benefits Estimated
Fall Semester	254,633	23.3%	18	5	\$7.10	\$29.81	\$37,953,048.65
Spring Semester	254,633	22.9%	18	5	\$7.10	\$29.32	\$37,329,197.80
						Total Benefits Estimated	\$75,282,246.45
						Administration	\$4,846,382.10
						Total Cost	\$80,128,628.55

- 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
 - DHS plans to distribute P-EBT benefits to children in child care, according to a staggered issuance schedule on multiple dates as indicated in the charts below for each of the proposed issuance cycles.
 - August 2021 – December 2021: Benefits will be issued in September 2022
 - January 2022 – May 2022: Benefit will be issued in October 2022

Issuance Cycles:

Cycle 1 September 2022	P-EBT Staggered Issuance
SNAP Recipients in Child Care	Benefits Issued for:
	August 2021 – December 2021

Cycle 2 October 2022	P-EBT Staggered Issuance
SNAP Recipients in Child Care	Benefits Issued for:
	January 2022 – May 2022

Cycle 3 November 2022	P-EBT Staggered Issuance
SNAP Recipients in Child Care	Benefits Issued for:
	Discrepancies and Appeals

- Georgia commits to informing USDA/FNS of any significant increase or decrease in the statistical data points, benefit amounts, or any changes to the estimated dates for benefit issuance proposed in the initial plan (or subsequent amendment).

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.)**
 - N/A
- **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**

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.

students (such as kindergarteners and transfer students), and children who become eligible during the school year.

- N/A
- **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.**
 - N/A
- **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.).**
 - N/A
- **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).**
 - N/A
- 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.
 - N/A

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.**
 - N/A

- **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?**
 - N/A
- **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.)**
 - N/A
- **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.**
 - N/A
- **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.**
 - N/A
- **Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.**
 - N/A

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.**

The State will use a simplifying assumption due to the lack of statewide child care enrollment data. The State will define eligibility as a child aged 0-6 in a SNAP-eligible household. Georgia is making the reasonable simplifying assumption that non-school children **under age 6 at the start of school year 2021-2022** but who turn 6 years old during the school year remain enrolled in child care through the end of the school year and into the summer. Of course, these children are only eligible for P-

EBT child care benefits in the months that they also receive SNAP benefits. These data will come from the Georgia Division of Family and Children Services, which holds the monthly SNAP data. **(Simplifying Assumptions)**

- DHS will issue benefits for issuance months:
 - Cycle 1 August 2021 – December 2021
 - Cycle 2 January 2022 – May 2022
 - Cycle 3 Discrepancies and Appeals

- **How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?**

The Georgia Division of Family and Children Services will use its SNAP records to verify SNAP eligibility. This data is updated monthly for eligible households and individuals within those households. If a child received SNAP for at least one day in the month, the child will be considered eligible for that month’s P-EBT benefits. A new EBT Card will not be issued for P-EBT benefits.

- **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)**

The state data provided by the Department of Early Care and Learning (DECAL) on FNS 44 – Report of the Child and Adult Care Food Program (CACFP) report will be utilized to determine eligibility for P-EBT benefits.

- **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? N/A Specifically, how will the State determine that: N/A**
 - 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?

DHS will utilize state level data from the FNS44 -CACFP report

- **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? No 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?**

N/A

- **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.)**
- Georgia will use the data submitted by DECAL to FNS on the FNS 44-CACFP report on a historical and monthly basis. Georgia is making the reasonable simplifying assumption that non-school children **under age 6 at the start of school year 2021-2022** but who turn 6 years old during the school year remain enrolled in child care through the end of the school year and into the summer. Of course, these children are only eligible for P-EBT child care benefits in the months that they also receive SNAP benefits. (**Simplifying Assumption**)
 - **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.)**
 - Georgia will use the data submitted by DECAL to FNS on the FNS 44-CACFP report on a historical and monthly basis. The amount of benefit is the semester average reduction in CACFP meals served multiplied by five for the months in the semester term.
 - **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).**
 - DHS and DECAL will serve as principal partners in the P-EBT program for child care children
 - DHS will determine, using data from DECAL on the FNS 44 – CACFP report statewide that facilities are operating with reduced attendance
 - DHS will identify children ages 0-6 who receive SNAP benefits. Georgia is making the reasonable simplifying assumption that non-school children **under age 6 at the start of school year 2021-2022** but who turn 6 years old during the school year remain enrolled in child care through the end of the school year and into the summer. Of course, these children are only eligible for P-EBT child care benefits in the months that they also receive SNAP benefits. Children who meet the requirements are deemed eligible for P-EBT benefits.
 - DHS will issue P-EBT benefits retroactively to allow for data collection by DECAL for FNS-44
 - DHS will be responsible for the issuance of P-EBT benefits on the households' SNAP EBT cards.
 - **What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.**
 - Georgia will only utilize data from FNS 44 – CACFP report because local county data is not reflective of all the State's child care facility locations and privatization of child care options in Georgia does not require standard data submission for operations.
 - DHS proposes the simplified assumption that based on the Families First Coronavirus Response Act (FFCRA), all children under the age of 6 are deemed to be enrolled in a covered child care facility.

- Georgia is making the reasonable simplifying assumption that non-school children **under age 6 at the start of school year 2021-2022** but who turn 6 years old during the school year remain enrolled in child care through the end of the school year and into the summer. Of course, these children are only eligible for P-EBT child care benefits in the months that they also receive SNAP benefits.
- Child care children will receive P-EBT benefits for the percentage of decrease/reduction of meals listed on the FNS 44 – CACFP report for the months of August 2019-May 2020 and August 2021 - May 2022.

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.**
 - Georgia would issue a benefit level equal to the average reduction in claims for the months available at the time of issuance multiplied by the maximum P-EBT school benefit in a month (typically 18 days).

Table 1: CACFP Lunches Served – Homes & Centers Excluding At-Risk Center Lunches in Georgia 2019 and 2021

Month	2019	2021	% Change
August	1,992,553	1,431,435	-28.2
September	1,891,642	1,475,905	-22.0
October	2,181,927	1,544,828	-29.2

November	1,727,456	1,459,586	-15.5
December	1,686,821	1,357,370	-19.5
Average monthly reduction rate			-23.3

Daily Total of Meals Served * Number of School days* Monthly CACFP Meal Rate \$7.10*18*23.3%=29.81
Average Monthly Benefit*Number of Months \$29.81*5= 149.05

Table 1: CACFP Lunches Served – Homes & Centers Excluding At-Risk Center Lunches in Georgia 2020 and 2022

Month	2020	2022	% Change
January	2,011,376	1,329,179	-33.9
February	1,924,254	1,519,939	-21.0
March	2,119,370	1,881,032	-11.2
April	2,132,951	1,616,813	-24.2
May	2,136,883	1,608,275	-24.7
Average monthly reduction rate			-22.9

Daily Total of Meals Served * Number of School days* Monthly CACFP Meal Rate \$7.10*18*23.9%=29.32
Average Monthly Benefit*Number of Months \$29.32*5= 146.58

P-EBT Benefit Level for School Year (SY) 2021-2022:

Breakfast \$2.35 + Lunch \$3.75 + Snack \$1.00 = \$7.10 (per child, per day)

Child Care:

P-EBT Months Child Care Children	Proposed Issuance Month
August 2021 – December 2021	September 2022
January 2022 – May 2022	October 2022
Discrepancies	November 2022

Child Care Children	Daily Total \$7.10
Based on state data	See the issuance table above

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.

Georgia proposes the following milestones:

August 2022

- P-EBT Child Care Plan Approval
- DHS will utilize established customer service lines 1-877-423-4746 to address discrepancies regarding the household mailing address, child's information, parent/guardian information, etc.
- Once approved, DHS and DECAL will issue joint press releases to announce the approval of P-EBT to the general public in order to inform parents, guardians, and the general public of program details and eligibility criteria.

September 2022

- Cycle 1: Child care benefits will be issued for August 2021 – December 2021

October 2022

- Cycle 2: Child care benefits will be issued for January 2022 – May 2022

November 2022

- Issue clean up file and reconcile cases that are appealed from households that state that they did not receive P-EBT benefits but should have been eligible for P-EBT benefits. Resolve any discrepancies.

Additional Information

- DHS is proposing to administer P-EBT benefits in three cycles of issuances due to system constraints. DHS understands there may be additional issuance of P-EBT benefits applied for in summer months, which will be addressed in a separate plan submission.
- DHS will consider adjusting Cycle 3 depending on the time frame needed to review and reconcile any discrepancies and complete the appeals process with households.
- DHS will involve all relevant stakeholders if there is a delay, discrepancy, or unforeseen circumstances in the implementation of the P-EBT program. DHS will utilize conference calls and virtual meetings to communicate challenges, questions, or possible amendments in order to find a feasible solution.
- DHS will contact FNS when the proposed issuance schedule is finalized. DHS will also contact FNS if there is a delay, discrepancy, or unforeseen circumstance in the implementation of the proposed schedule.
- DHS proposes to issue P-EBT benefits over a five-day staggered issuance period, following the conclusion of the regular SNAP issuance cycle.

EBT Processing and Benefit Issuance:

- DHS will use the data contained in the SNAP eligibility records to confirm the households that will receive P-EBT for children in child care settings.
- These household records and the calculated amount of P-EBT benefit for each issuance month will be sent to DHS' internal EBTA system.

- The EB-TAS system will verify all required data elements are included prior to sending the file to the EBT Service Provider, Conduent State & Local Solutions, Inc via batch file.
- The calculated benefit amount will be loaded onto each head of household's EBT card for each month of issuance by Conduent.
- DHS will work with Conduent and include them in the planning process for P-EBT program implementation.
- DHS will work with the Georgia Retailer Association to ensure dates and amounts of issuances will not pose a strain on retailers.
- DHS agrees to complete the FNS-292, FNS-46, FNS-388 and other reports in accordance with FNS requirements.
- DHS will follow the same expungement requirements for P-EBT as regular SNAP benefits, which is 274 days from the last date of client-initiated activity.

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?**
 - DHS will not issue new P-EBT cards. All benefits for children in child care will be issued to the SNAP household's existing EBT card.

- **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.**

The State will use the issuance type "L" as used in the previous P-EBT program.

- **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.**

The draw down priority will be first in-first out.

- **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.**

P-EBT benefits will follow the same expungement rules that the State 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?**

If customers require a replacement card, they will be instructed to contact Conduent to request a replacement card.

- **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?**

DHS will not issue new P-EBT cards. All benefits for children in child care will be issued to the SNAP household's existing EBT card.

- **If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?**

All benefits for children in child care will be issued to the SNAP household's existing EBT card. If customers require a replacement card, they will be instructed to contact Conduent to request a replacement card.

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.**
 - If families reach out to DFCS to resolve issues related to a dispute about eligibility or amounts of benefits from the prior SY 2020-2021, DFCS will work with GaDOE as a data provider in the prior plan to determine if benefits should be issued to those families. If eligible, DFCS will receive approval from FNS to issue the benefit and work with its EBT team to issue retroactive benefits to families.
 - In instances in which GaDOE has previously determined that a child(ren) was eligible for P-EBT for SY 2020-2021 but benefits were not issued due to missing data GaDOE will work with DFCS to provide the required data for benefit issuance.
 - In instances from SY 2020-2021 in which GaDOE has previously denied eligibility in error and has since acknowledged an individual's and/or school's eligibility, if calculations have already been computed by GSU, DFCS will issue

the benefits.

- SNAP recipients can update their address or eligibility information via DFCS. These monthly data will be used in subsequent data pulls to determine retrospective eligibility.
 - For the purposes of the school year 2021-2022 Child Care only submission, the State will issue benefits for past years if and when the state later discovers that eligible children were missed in the child care plan. Georgia commits to informing USDA prior to making any such prior year issuances. Georgia in any payment remedy situation would indicate the nature of the error that led to the missed payment, the number of children affected, and the dollar value of the proposed corrected issuance.
 - DHS is prepared to continue a Customer Call Center unit of 75 staff dedicated to resolve calls and appeals or issuance of errors of P-EBT benefits.
 - Customers can call the 1-877-423-4746 to address discrepancies regarding the household mailing address, child's information, parent/guardian information, etc.
 - The Customer Call Center will take information, connect with case managers to research SNAP eligibility and the EBT team to research the dispute, the EBT benefit issuance (if applicable), and determine if the dispute is valid or invalid.
 - The parent/guardian will be contacted by telephone with the resolution of the dispute.
 - If the dispute is escalated or becomes excessive, DHS will designate additional, SNAP or EBT experienced staff to address disputes as needed.
- **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.**
 - DHS will assist vulnerable groups and/or households that express having challenges or issues with accessing P-EBT or P-EBT program information.
 - Limited English proficiency (LEP) households may contact the Customer Contact Center and a translator service will be provided free of charge.
 - Individuals who are hearing impaired, hard of hearing, or have speech disabilities can call the Georgia Relay Service at 1-800-255-0135 for assistance.
- **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).**
 - The State will conduct public information campaigns (website, social media, earned print/web media) to alert the public about the P-EBT program. The State will coordinate this effort with community partners and advocacy groups.
 - The State will encourage all participating agencies in this plan to post the same information on their websites for unified information. DFCS will maintain a P-

EBT focused webpage and encourages all partners to do the same with consistent messaging.

- The State will use community partner agencies, food banks and other local agencies to amplify its message, utilizing the coordination of the DFCS Customer Contact Center and P-EBT troubleshooting workgroup. The State will provide user-friendly Q&As that partner agencies can use in their messaging.
 - The State will conduct public information campaigns (websites and social media) to alert those receiving benefits of the purpose of P-EBT and how it should be used. The State will coordinate this with community partner agencies.
 - The State will encourage all participating agencies in this plan to post the same information on their websites for uniform information. This will include the calculations used at a school/district level, so families can understand the benefit level.
 - Customers will also receive information about their P-EBT benefits.
 - The State will use the United Way 211 line, DECAL, and Family Connections to communicate information about the P-EBT program.
- **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.**

This is not applicable as all benefits for children in child care will be issued to the SNAP household's existing EBT card. Clients should retain their existing EBT card for future benefit issuance.

- **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)**

Create an FAQ to cover the information for SNAP households below that will be included on the website and mailed to recipients.

- A description of P-EBT

- A decision tree to understand why they are getting benefits and why they are getting the amount they are getting
 - The months they are currently receiving benefits for and when future benefits will be issued
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used
 - Explanation of violations and penalties
 - Indication that benefits are non-transferable
 - Information regarding a website for questions
- **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.**

Create an FAQ to cover the information for SNAP households below that will be included on the website and mailed to recipients.

- A description of P-EBT
 - A decision tree to understand why they are getting benefits and why they are getting the amount they are getting
 - The months they are currently receiving benefits for and when future benefits will be issued
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used
 - Explanation of violations and penalties
 - Indication that benefits are non-transferable
 - Information regarding a website for questions
- **Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?**

The FAQ will be posted on the DFCS website and DFCS social media page. Individual notice communications limited to 500 characters can also be sent to P-EBT issued clients.

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.

DHS will make all reasonable efforts to detect over-issuance, improper payments, and payment errors. These efforts will include using established methods, processes and channels to receive tips, complaints, and referrals regarding P-EBT activity.

DHS will contact FNS for additional guidance before taking any action when an over-issuance, invalid payment, or improper payment is detected or discovered. DHS will describe the nature of the error, number of children involved, value of the error, and the recommended action by agency. DHS reserves the state's right to take appropriate corrective action in cases of state error, with prior contact to FNS for additional guidance before taking any state over-issuance action.

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.

- The State of Georgia acknowledges the above statement regarding benefit issuance reporting.

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.

- The State of Georgia acknowledges the above statement regarding administrative funding.

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.”

- The State of Georgia acknowledges the above statement regarding the release of information.

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.

- The State of Georgia confirms that it 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.

- The State of Georgia acknowledges the above statement regarding the administration of the State P-EBT plan.

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



Candice L. Broce, Commissioner
Georgia Department of Human Services



Amy Jacobs, Commissioner
Georgia Department of Early Care and Learning

Date of Request August 5, 2022