

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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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 school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021

1. **State:** South Dakota

2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 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).

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. 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 child care

¹ The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

² Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

Response:

1. Date Range

South Dakota proposes to amend its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from August 1, 2020 through September 30, 2021 for 2020-2021 school year benefits.

- a. Children in School: The date range for the current plan is August 1, 2020 through September 30, 2021.
- b. Children in Child Care: N/A

The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

2. Amount of P-EBT Benefits

The estimated amount³ of P-EBT benefit issuance during the date range covered by this plan are as follows:

- a. Estimated monthly issuances of \$2,039,040
 - Monthly amount issued to school children in a SNAP household: \$1,208,400
 - Monthly amount issued to school children in a non-SNAP household: \$830,640
 - Monthly amount issued to non-school children in child care: N/A
- b. Estimated total issuance of \$20,390,400 (monthly estimate multiplied by the ten months in the 2020-2021 school year)
 - Total amount issued to school children in a SNAP household: \$12,084,000
 - Total amount issued to school children in a non-SNAP household: \$8,306,400
 - Total amount issued to non-school children in child care: N/A

3. Number of Children

The estimated total⁴ number of children to which the State will issue P-EBT benefits is 25,488.

- a. Number of school children in a SNAP household: 15,105
- b. Number of school children in a non-SNAP household: 10,383
- c. Number of non-school children in child care: N/A

4. Administrative Funds

The 366a will be submitted for administrative costs once the budget is finalized.

³ The estimate is based on the only data available at this time. The estimate is based on the 2019-2020 eligible percent of students, then assuming 50% of those children would be eligible. Of the eligible children, 75% will receive the hybrid payment of \$68 and 25% will receive the remote payment of \$116. Data will be available in June 2021.

⁴ The estimate is based on the only data available at this time. The estimate is based on the 2019-2020 eligible percent of students, then assuming 50% of those children would be eligible. Of the eligible children, 75% will receive the hybrid payment of \$68 and 25% will receive the remote payment of \$116. Data will be available in June 2021.

5. Tentative P-EBT issuance schedule

- a. August 2020 – May 2021 Benefits: Issued between July 15th – August 15th

4. P-EBT for School Children

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 2020-2021, *or*
 - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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.

1. 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 2019-2020 graduates and other non-students.
2. How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? 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.
3. How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
4. 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.).
5. 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).
6. Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response:

1. Identification/Determination of Child’s Eligibility for Free or Reduced-price Meals

The outlined process will be utilized for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.

The South Dakota Department of Education (DOE) will identify children who are eligible for free or reduced-price meals for school year 2020-21 in both public and private schools by utilizing a simplified assumption that those eligible for free or reduced-price meals in the 2019-20 school year are also eligible for free or reduced-price meals in the 2020-21 school year. DOE will begin by using the 2019-20 free and reduced file and will exclude students who have graduated from school and have transferred out-of-the state. DOE will add new 2020-21 Kindergarten students to this list. DOE will also utilize data provided by the school districts (any household free and reduced applications received) to determine a student’s eligibility for free or reduced-price meals for the 2020-21 school year and will add these students. DOE will use the Direct Certification file to make sure all students receiving SNAP are included. DOE will also leverage additional files to make sure students who are foster, migrant, or homeless are also included.

2. Confirmation of Child’s Lack of Access to Meals at School

The outlined process will be utilized for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.

DOE will collect monthly data provided by each school within the school districts to determine a student’s learning mode via the DOE End of Year survey. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts (both public and private) to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person. Schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria.

3. Process to Update and Re-establish Child’s In-person and Virtual Schedules

SD will use simplified assumptions based on the End of Year Survey. DOE will collect data provided for each school by the school districts. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes

utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person. Schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing the End of Year survey to obtain this information.

4. Roles and Responsibilities of Each State Agency

The South Dakota Department of Social Services (DSS) is responsible for the issuance of P-EBT benefits, the issuance of P-EBT cards and replacement cards (through its vendor, FIS), providing notices to customers, establishing and maintaining a P-EBT website for customers, and responding to customer questions or concerns. Questions regarding eligibility that DSS is unable to resolve will be referred to the local school district, who may coordinate potential resolutions with the DOE.

The South Dakota Department of Education (DOE) is responsible for providing DSS a list of students as noted in the Eligible Children section in response #1 and associated with qualified schools as noted in response #2 and #3 of that same section. DOE will provide a list of all students with free and reduced eligibility for each qualifying school and the number of months the child is eligible for P-EBT benefits. DOE will provide a question and answer document to assist DSS with questions about free and reduced eligibility and school eligibility, which includes a list of eligible and non-eligible schools.

5. Simplifying Assumptions

South Dakota intends to leverage simplifying assumptions to issue two benefit amounts; one for hybrid students and one for remote students (details are provided in the Benefit Level section).

South Dakota intends to issue one lump-sum payment:

- The payment for the months of August 2020 through May 2021 will be issued between July 15th – August 15th, 2021.

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.

7. 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.
8. 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?
9. 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.)
10. 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.
11. 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.

Response: [please use as much space as needed]

- **Identification and Confirmation of School Status**

SD will use simplified assumptions to identify fully remote, hybrid, or in-person learning mode based on the End of Year Survey. DOE will collect data provided by the school districts for each school within the district. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year for each school within the district. Learning mode options are remote, hybrid or in-person, schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing

the End of Year survey to obtain this information.

- **Confirmation the School has been Closed or Operating with Reduced Attendance or Hours for a Minimum of 5 Consecutive Days**

SD will use simplified assumptions to identify fully remote, hybrid, or in-person learning mode based on the End of Year Survey. DOE will collect data provided by the school districts for each school within the district. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person. Schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing the End of Year survey to obtain this information.

- **Information Attainment and Frequency of Collection of Information**

DOE will collect data provided by the school districts for each school within the district. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person. Schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing the End of Year survey to obtain this information.

- **Monitoring Changes in Eligible School Status**

DOE will collect data provided by the school districts for each school within the district. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person, schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing the End of Year survey to obtain this information.

- **Simplifying Assumptions**

DOE will collect data provided by the school districts for each school within the district. This survey will be conducted using Survey-Monkey. It will be sent to all accredited school districts to be completed and returned from each school within the district. The survey is scheduled to be released on May 1, 2021 and completed by mid to late May. The survey will identify learning modes utilized during the 2020-21 school year. Learning mode options are remote, hybrid or in-person, schools will make selections for each month in 2020-21. The survey will also identify the schools that met the 5-day closure, reduced attendance, or reduced hours criteria. The DOE does not normally collect this data and therefore we are utilizing the End of Year survey to obtain this information.

5. P-EBT for Children in Child Care

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 received SNAP benefits at any time since October 1, 2020.
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.

12. Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
13. How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
14. 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?
15. 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?
16. 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?
17. 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.)
18. 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).
19. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response:

P-EBT for childcare will be addressed in a separate plan submission.

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 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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-2020-07-22/pdf/2020-15764.pdf>

20. Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

Benefit Levels Proposed

South Dakota will provide a benefit of \$6.82 per day for each day a student is learning remotely (remote student) or scheduled to be at school with reduced hours of attendance (hybrid student).

Hybrid Students:

On average, it is estimated hybrid students will be out of school for approximately 60% of full-time school days (10 days); therefore, the student will be issued the daily rate of \$6.82 for 10 days.

- 10 days * \$6.82 = \$68 (rounded to the nearest whole dollar)

Remote Students:

On average, it is estimated students are in school 17 days per month; therefore, the student will be issued the daily rate of \$6.82 for 17 days.

- 17 days * \$6.82 = \$116 (rounded to the nearest whole dollar)

Determination of Days of Eligibility

Days of eligibility are based on the average number of days a school would have been in session if not operating under hybrid or remote learning schedules.

Each student will be matched with his/her school and be issued a monthly benefit amount based on the school's response to the DOE End-of-Year Survey, which will indicate a learning mode of remote, hybrid, or in-person for each month in the 2020-2021 school year.

Simplifying Assumptions

South Dakota intends to leverage simplifying assumptions to issue two benefit amounts; one for hybrid students and one for remote students.

Hybrid Students:

On average, it is estimated hybrid students will be out of school for approximately 60% of full-time school days (17 days); therefore, the student will be issued the daily rate of \$6.82 for 10 days.

- 10 days * \$6.82 = \$68 (rounded to the nearest whole dollar)

Remote Students:

On average, students are in school 17 days per month; therefore, student will be issued the daily rate of \$6.82 for 17 days.

- 17 days * \$6.82 = \$116 (rounded to the nearest whole dollar)

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 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?
- 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 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response:

Tentative Implementation Timeline

Tentative Dates	Milestones
April	USDA Approves State Plan
March – April	DSS/DOE Provide Informational Training to Schools
May 1st	DOE Sends Survey to School Districts
May 31 st	School Districts Return Survey to DOE
June 1 st – June 30 th	DOE Analyzes Data and Creates School and Student Free and Reduced Eligibility File
June 30 th	DOE Sends School and Student Free and Reduced Eligibility File to DSS
July 1 st – July 15 th	DSS Processes Eligibility File
July 7 th	DSS/DOE Issue Joint Press Release
July 15 th	DSS Sends Notices to SNAP and Non-SNAP Households
July 15 th – August 15 th	DSS Opens Online Verification Tool for Non-SNAP Households
August 15 th	DSS Closes Online Verification Tool for Non-SNAP Households
July 15 th – August 15 th	DSS Issues P-EBT Benefits to All Households as the Non-SNAP Household Completes the Online Verification Tool
July 1 st – No end date	DSS Responds to Customer Services Contacts

P-EBT Card Design

Non-SNAP P-EBT households will be issued the same card design that is utilized for regular SNAP households. SNAP P-EBT households will be issued P-EBT benefits on their current, regular EBT card.

Distinguish P-EBT from SNAP and D-SNAP Issuances

South Dakota will use the sub-benefit type, which distinguishes P-EBT benefits from regular SNAP and D-SNAP issuances.

Draw/Spend Priority for P-EBT, SNAP, and D-SNAP

South Dakota's draw/spend priority will be as follows: First draw will be Pandemic (P-EBT) and the next draw will be regular SNAP benefits.

Expungement of P-EBT Benefits

South Dakota will follow the same expungement rules as regular SNAP.

Handling of Returned EBT Cards to processors via mail, due to incorrect addresses.

South Dakota is implementing processes to lessen returned mail due to incorrect addresses. These processes include:

1. DOE will request school districts update student address records with the most current addresses and contact email addresses. This information will be reinforced with school districts during our regularly scheduled spring training and during weekly Superintendent calls. DOE will also address this topic during the Tribal Education Director and the school business manager monthly call.
2. DSS will implement an online verification tool, similar to the first round of P-EBT. This verification tool will require the parent/guardian to enter their current, valid mailing address.

Undeliverable EBT cards are returned to the return mail facility in Sioux Falls, South Dakota. Return mail processing includes updating the card status in ebtEDGE to indicate "Undeliverable" in the card status field. In addition, DSS receives a daily list of undeliverable cards.

Will you issue *new* P-EBT cards to existing P-EBT households?

New P-EBT cards will be issued to non-SNAP households. The online verification tool will be utilized to collect accurate addresses as well as information that is required to issue an EBT card to non-SNAP households. SNAP households, Medical Assistance-only households, and/or TANF-only households will not need to complete the online verification tool. Each non-SNAP household will receive a letter providing directions to complete the online verification tool. If a household does not have access to the internet, they may complete a paper verification tool. If assistance is needed, the household may contact customer service via the toll-free number or the P-EBT email address.

SNAP households will continue to use their existing EBT card. If their current card has been lost, the SNAP household will follow the regular process for requesting a replacement EBT 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 questions from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

Resolution of Disputes or Issuance Errors

DSS will have a specific email inbox and toll-free phone number for P-EBT inquiries. The inbox and phone will be monitored by experienced staff. DSS is committing several experienced staff, on a rotating basis, to assist with and research complex cases. DSS is committed to thoroughly researching P-EBT cases to ensure benefits reach eligible children.

Serving Groups with Potential Access Problems

DSS and DOE are implementing a multi-faceted approach to ensure robust and accurate communication is available to all eligible households regardless of primary language, lack of permanent address or access to technology.

All households will have access to a P-EBT toll-free number and a specific email address, which will be staffed by experienced DSS staff. DSS will operate a P-EBT website. DSS will allow non-SNAP, P-EBT eligible households to complete an online or paper verification form.

DSS currently utilizes a language line provider, Language Services Associates (aka Interpretalk). This provider offers more than 200 languages, 24 hours per day/7days per week. DSS staff are well trained on utilization of Language Services Associates and each office and staff member has unlimited access to this service. This is a viable option for the state agency and works well for our customers. Additionally, DSS has strong relationships with local community-based organizations and will continue to partner with these organizations to provide interpreter services.

Children without social security numbers (SSN) will be able to receive P-EBT benefits. The online verification tool allows the parent or guardian to enter the child's SSN; however, SSN is not required for issuance of P-EBT benefits.

DOE has current direct certification data for certain children, including SNAP, TANF, homeless, foster care, and migrant.

DOE will work closely with school districts to ensure a mailing address is updated for all children, including homeless children, migrant children, and foster care children.

State's Public Information Campaign

DSS and DOE will release a joint, statewide media release regarding P-EBT benefits for the 2020-2021 school year. DSS will maintain a public P-EBT website with relevant information, which will be updated as needed. Relevant information will include a frequently asked questions document for commonly asked questions; a list of schools that have been identified as eligible for P-EBT based on information gathered through the DOE survey; the toll-free phone number and email address customers may contact with questions; and the online verification tool.

Information Provided to Households that do not want P-EBT benefits

Each SNAP and non-SNAP P-EBT household will receive a notice from DSS informing the household what to do if they do not want P-EBT benefits. This information will also be available on the P-EBT website.

Information Provided *Directly* to P-EBT Participants

Each SNAP and non-SNAP P-EBT household will receive a notice informing the household of the following information:

- Description of P-EBT;
- Information regarding the P-EBT email address, phone number, and website address that participants access if they have questions or need assistance;
- Instructions for destroying the EBT card, if they decline P-EBT benefits;
- Instructions to select or change a PIN for 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; and
- Indication that benefits are non-transferable.

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: [please use as much space as needed]

DSS and DOE are committed to working with schools and eligible P-EBT families to ensure accurate issuance of P-EBT benefits. DOE is working with school districts to ensure current household information is obtained and submitted. DSS is implementing a verification tool, similar to the first round of P-EBT, to ensure accurate issuance of P-EBT benefits.

DSS has a validation process to ensure that duplicate online verifications are unable to be completed. The information provided in the customer notice has two key data elements critical for validation to ensure duplication does not occur. First, the application ID is tied to the head of household and all associated children contained within the DOE file. Once the verification is submitted and sent to the EBT processor, the application ID specific to all individuals in that household will be identified as receiving P-EBT and will not be able to complete another application successfully. Second, a unique identifier for each student must be entered by the household. This unique student identifier will need to match the identifier DSS has on file in order for a household to successfully complete the verification. Thus, households will not be able to apply for children multiple times or include ineligible children on the application to increase benefit amounts.

DSS is also committing several experienced staff, on a rotating basis, to provide customer service and assist with and research complex cases. DSS is committed to thoroughly researching P-EBT cases to ensure benefits reach eligible children.

10. Benefit Issuance Reporting

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

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar

construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

12. Release of Information

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

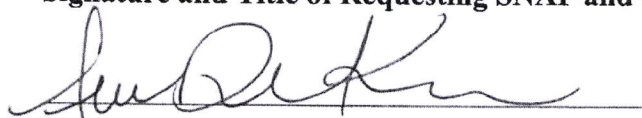
13. Civil Rights Statement

The State will continue to comply with civil rights requirements, 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:



Amanda Doherty-Karber
SNAP Administrator, SD Department of Social Services



Cody Stoeser
Director of Finance, SD Department of Education

Date of Request: 5/11/2021