

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

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 children in schools or childcare 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 Child Care 2021-2022

1. **State :** United States Virgin Islands
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 childcare
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of non-school children in childcare
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - Children in childcare

Response:

The estimates were calculated using the available data from the Caribs Eligibility System for the period of August 2021 through May 31, 2022. USVI does not expect any significant increase or decrease in these data points. But USVI is committed to inform USDA of any significant changes during the date range covered by this initial plan.

- a. The date range covered by this plan will be from August 1, 2021, through May 31, 2022.

The estimates of P-EBT issuances for the date range coverage period are as follows:

- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated Highest Monthly Issuance: ***\$116,113.50***.

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 Lowest Monthly Issuance: **\$25,603.00**
 - i. Estimated amount issued to Children in Childcare in SNAP households:
 - Total Estimated Issuance: **\$ 2,344,124.28**
- c. Estimated total **number** of children to which the State will issue P-EBT benefits: **2905**
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- August 2021 through May 2022 P-EBT benefits for SNAP children in childcare will be issued the week of May 22, 2023.
- The estimated total amount of administrative funds the USVI needs to complete the work will be provided on the 366A.
 - The P-EBT issuance schedule is as follows:

USVI will issue P-EBT benefits for children in childcare the week of July 3, 2023. The schedule is to issue a one-time payment for August 2021 through May 2022.

<i>Process Day</i>	<i>Description</i>
<i>Week of July 3, 2023(Tentative)</i>	<i>Issue August 2021 through May 2022</i>

- recipients, and provision of customer service and support.
- Programming Solutions Inc (PSI) is responsible for conducting file review and processing, computer matching and screening to prevent duplicate eligibility and issuances and transmitting files to FIS

4. 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 childcare facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the childcare facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: USVI will assume all children under the age of 6 (as of August 2021) to be enrolled in a covered childcare facility.

USVI will identify non-school SNAP children and confirm their eligibility by using the SNAP eligibility system called CARIBS. Through this system, USVI will be able to determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements.

USVI plans to issue a one-time payment to cover the August 2021 through May 2022 P-EBT period during the week of July3, 2023.

USVI will identify the following non-school SNAP children eligible to receive P-EBT benefits using these simplified assumptions:

- All SNAP-enrolled children under the age of 6 as of August 1, 2021, that received SNAP benefits anytime from August 2021 through May 2022. These eligible SNAP-enrolled children will receive P-EBT benefits during the months they received SNAP benefits.
- Once the child is determined eligible for P-EBT benefits, the child will remain eligible thru May 2022, even if the child turns 6 after August 2022, except when the child is removed from the SNAP household or when the SNAP case closes, then the P-EBT benefits will terminate on the last month of SNAP eligibility.
- Every child found eligible will go through a duplicate check routine to ensure the child will only receive one P-EBT benefit per month. The duplicate routine matches the SSN and Date of Birth or Last Name, First Name and Date of Birth.
- Due to the difficulty of verifying children's enrollment in a childcare facility, USVI will exclude children aged 6 in August 2021 and not attending school.

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

- US Virgin Islands Department of Human Services (VIDHS) is responsible for the administration of the P-EBT program to include determining the eligible non-school SNAP children from the eligibility system, sending files to FIS for benefit issuance, notifying clients and general public about the P-EBT process, and operating Customer inquiry center.
- Fidelity Information Services (FIS) is responsible for the issuance of P-EBT benefits.

5. 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:

- CACFP lunch claims confirm that there has been a reduction in access to child care for each of the months of the current school year through [January 2022] relative to the same months immediately prior to the pandemic.

For purposes of this plan, USVI 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. USVI will exclude at-risk lunches and adult lunches. See Table 1 below for VI lunch claims for the fall semester.

Setting Benefit Levels Using the CACFP Data Method

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

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019.
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: $[170] \div [10 \text{ months}] = [17]$ days per

3. 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.

4. The school year 2021-2022 P-EBT benefit per day is \$8.28.

Fall Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:
August 2019	1,583	August 2021	711	To be applied to daily rate and number of school instructional days per month.
September 2019	12,653	September 2021	4,443	
October 2019	17,401	October 2021	7,001	
November 2019	14,506	November 2021	7,198	
December 2019	13,895	December 2021	6,560	
Total	60,038	Total	25,913	-56.8%

Spring semester benefit:

1. The spring semester benefit will be calculated as below 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 Below
2. Before calculating its monthly spring P-EBT benefit, USVI 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 CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Spring Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester:
January 2020	15,914	January 2022	2,139	To be applied to daily rate and number of school instructional days per month.
February 2020	18,271	February 2022	8,708	
March 2019	17,928	March 2022	10,937	
April 2019	13,391	April 2022	6,833	
May 2019	14,215	May 2022	7,762	
Total	79,719	Total	36,379	-54.4%

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
Fall Semester	56.8%	17	5	\$8.28	\$80.01
Spring Semester	54.4.%	17	5	\$8.28	\$76.53

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle

returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?

- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response:

USVI is proposing the following timeline and benefit issuance schedule:

- Week of May 22, 2023
 - State Plan is approved.
 - Request FIS to submit Customer Authorization.
- Week of June 12, 2023
 - User Acceptance Testing Commences
- Week of June 26, 2023
 - User Acceptance Testing Completed
 - Approval of FIS Customer Authorization
 - DHS contractor to implement P-EBT program changes.
 - DHS contractor to inform FIS the issuance schedule and expected number of records and benefit amount.
 - Public awareness campaign commences.
- Week of July 3, 2023
 - Issue August 2021 through May 2022 monthly P-EBT benefits for Children in Childcare
 - File transfer to the EBT processor, FIS. Benefits will be available on the cards on the same day.
 - Generate and mail notices.

USVI confirms that FNS will be updated of any changes to the final issuance schedule.

The draw/spend priority will be P-EBT first, then SNAP and DSNAP.

USVI intends to follow the same distribution model utilized in the previous implementation of P-EBT. Current SNAP households will receive their P-EBT benefits on their SNAP EBT card.

VI will continue to use FSPEBT code which was modified specifically for P EBT. VI will

utilize the same expungement rules that is used for SNAP for PEBT.

7. Customer Service

Recommended Standard for Household Support

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

1. USDA strongly encourages States to provide a means to resolve disputes and answer from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for pinning 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:

The USVI will continue to utilize and publish the PEBT Territorial Number (340) 772-7120 (PEBT Hotline) to address customer concerns, provide information or to resolve disputes and issuance errors. Several personnel will be available to answer calls routed to this number and who will be empowered to research and address cases. Additionally, a specific email/inbox was created internally at DHS where clients may forward issues or disputes. A dedicated team will monitor this inbox and problem solve issues utilizing the records from the Caribs Eligibility System. Moreover, the DHS Commissioner will be a featured Presenter on Governor's Press Briefing and will also host a Facebook Live to announce issuance of PEBT for children in childcare for SNAP recipients.

USVI will provide access for individuals who speak Haitian Creole and Spanish to report their concerns. Based upon the issue reported, USVI will refer the customer to a specific staff who is able to speak the language to resolve the issue.

USVI will conduct a public information campaign to alert those receiving benefits, and how it is to be used via press releases print and electronic media, radio, commercials, social media, Office of the Governor, USVI Department of Human Services face book page and website.

P-EBT recipients will receive information which will include:

- a. Description of P-EBT
- b. Explanation of benefit amount.
- c. Benefit expiration date
- d. Clarification that benefits are not transferrable and that households should destroy cards if they wish to decline the benefits.
- e. How to use the card and their benefits
- f. Replacement cards
- g. FIS customers services

8. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

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

Response:

USVI confirms expectations regarding benefit over issuances. VI will not reclaim any PEBT benefits by reducing a household's SNAP benefit. It is important to note however when it is deemed appropriate USVI may attempt to recover mistakenly issued benefits. Prior to attempting to reclaim benefits, FNS will be contacted. USVI will research any cases or inquiries that are brought to our attention where perhaps custody recently changed or guardian or custodial parent status changes. If the benefit has already been spent, then no further action will be taken. If the eligible child has not received the benefit, a P-EBT card will be reissued for the student. Households will be given clear information that if guardian or custodial information changes, they are responsible for returning the card to the agency. Failure to do so could result in formal action to recoup benefits. Further, USVI confirms that whenever issuance errors are identified, USVI will contact FNS as well as complete the over issuance spreadsheet provided by USDA. Information such as a description of the size of the overpayment, the number of children affected, the reason for the error, and a thorough explanation of the corrective action that the state will take or has taken to prevent a recurrence of the error.

9. Benefit Issuance Reporting

USVI 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.

10. 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.

11. 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.”

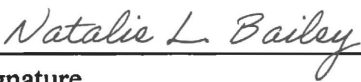
12. Civil Rights Statement

USVI will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.


13. Administration of State P-EBT Plan

USVI 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 State Agency Officials:



Signature
Natalie L. Bailey, Administrator



Signature
Kimberley Causey- Gomez, Commissioner

Date of Request 05.18.2023