

**State Plan for Pandemic EBT: Children in School
School Year 2020-2021**

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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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
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>

State Plan for Pandemic EBT: Children in School
School Year 2020-2021

1. **State:** West Virginia
2. **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act

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.
- 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
- 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
- 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
 - Issuance for both SNAP and non-SNAP households will occur in tandem.

Response:

West Virginia's P-EBT date range for school year 2020-2021 will be August 17, 2020 – September 30, 2021. This timeframe will allow West Virginia to retroactively issue benefits for August and September 2020. Retroactively issuing the August/September benefit period is proposed due to Executive Order (EO# 68-20) signed by Governor Jim Justice. EO# 68-20 stated all schools in West Virginia were prohibited from opening the school year in any format prior to September 8, 2020 due to the COVID-19 pandemic.

West Virginia reviewed all 55 approved, county board of education calendar(s) and utilized a simplified assumption using the best feasibly available data to determine the average start date of schools. The daily allowable rate for eligible students under this plan is \$6.82 per day. Based on Fall 2020 school enrollment data, WV has approximately 57,732 eligible SNAP students and 164,663 eligible non-SNAP students.

To calculate estimated amounts of P-EBT the state will issue, West Virginia applied a simplified assumption to determine the number of benefit days that in-person/hybrid learners are eligible for. After reviewing current operation plans for all 55 counties, the state determined most in-person/hybrid learners were attending in-person learning 2 days each week. Therefore, to calculate an estimate West Virginia applied a simplified assumption allocating 3 benefit days per week to in-person/hybrid learners. 100% virtual learners are allocated 5 days of benefits per week to create an estimate.

West Virginia will not use these estimates to issue P-EBT. Eligibility data will be collected monthly for each student/school by local boards of education. This data will be unique to the student's individual attendance, learning model, school closures, etc. The state will calculate monthly P-EBT for each eligible student equal to the daily reimbursement for free breakfast, lunch and afterschool snack, multiplied by the number of benefit days calculated as described in this plan.

West Virginia estimates that it will issue \$196,568,959 in P-EBT to approximately 222,395 students for school closures and reductions in attendance and hours extending from August 2020 through June 2021.

SNAP Students

West Virginia has approximately 57,732 SNAP students enrolled. According to WVDE data regarding enrollment for the Fall 2020 semester, 30% of students elected virtual learning and 70% of students elected in-person/hybrid.

100% virtual learners – Of the 57,732 SNAP students enrolled in WV schools, 30% or 17,320 elected virtual learning. The total allocation for SNAP students electing virtual learning: **17,320 children x 180 days (total instructional days) x \$6.82/day = \$21,262,032.00**

In-person/Hybrid learners - 70% or 40,412 students (of 57,732 SNAP students enrolled) elected in-person/hybrid learning. The total allocation for SNAP students electing in-person/hybrid learning: **40,412 students x 3 benefit day(s) per week x \$6.82/day x 36 school weeks = \$29,765,862.72**

Non-SNAP

West Virginia has approximately 164,663 eligible non-SNAP students enrolled. According to WVDE data regarding enrollment for the Fall 2020 semester, 30% of students elected virtual learning and 70% of students elected in-person/hybrid.

100% virtual learners – Of the 164,663 eligible non-SNAP students enrolled in WV schools, 30% or 49,399 elected virtual learning. The total allocation for non-SNAP students electing virtual learning: **49,399 students x 180 school days x \$6.82/day = \$60,642,212.40**

In person/hybrid learners – 70% or 115,264 students (of 164,663 non-SNAP students enrolled) elected in-person/hybrid. The total allocation for non-SNAP students electing In-person/hybrid: **115,264 students x 3 days benefits per week x \$6.82/day x 36 week = \$84,898,851.84**

in-person/hybrid: **115,264 students x 3 days benefits per week x \$6.82/day x 36 week**
= \$84,898,851.84

All eligible students will be issued P-EBT at the same time. Issuance will not be fragmented based on receipt of SNAP benefits. West Virginia will issue P-EBT based on the following tentative schedule:

P-EBT Benefit Period	Tentative Issuance Date
August/September 2020	March 15, 2021
October/November 2020	April 15, 2021
December 2020/January 2021	May 15, 2021
February/March 2021	June 15, 2021
April/May 2021	July 15, 2021
June 2021	August 15, 2021

West Virginia is committed to informing USDA of any significant increase or decrease in these data points during the benefit period August 17, 2020 – September 30, 2021 as covered by this initial plan.

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.

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.

- Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- 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.
- 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.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

Response:

The P-EBT Program will be led jointly between the West Virginia Department of Education (WVDE) and West Virginia Department of Health and Human Resources (DHHR). WVDE is the state agency responsible for the administration of the National School Lunch Program NSLP (in both private and public schools) and the oversight of public education in West Virginia. WVDE operates a

statewide educational information system (WVEIS) and a statewide student eligibility system (PrimerEdge). Both systems utilize data that is provided and owned by county level boards of education.

Within WVDE, the Office of Child Nutrition, the Office of Data Management and Information Systems, and the West Virginia Education Information System Office will provide initial and ongoing training to county boards of education about program eligibility, and process and procedure for ensuring county level enrollment data is accurate. WVDE will be the agency responsible for providing and confirming the following data elements:

Individual Student Eligibility: WVDE’s PrimerEdge captures student eligibility information based on individual student status, or enrollment in a CEP school. PrimerEdge captures free/reduced status in real time for all students participating in the NSLP. The state will be able to identify SNAP and non-SNAP students, for both public and private schools participating in the NSLP. West Virginia conducts direct certification (DC) matching at a more frequent interval than what is required by federal regulations. WV conducts DC matching at weekly intervals for SNAP, TANF and Medicaid, and at monthly intervals for students in the Foster system.

Individual Student Enrollment: WVDE’s WVEIS captures enrollment information for WV’s public-school students. Only students who are enrolled in school during SY 2020-2021 have active enrollment records in WVEIS. Students that have graduated are inactive in WVEIS, these students will not be included in eligibility file for P-EBT. WVEIS data batches nightly. Any changes in student enrollment for any student newly enrolled/newly withdrawn is captured daily.

Individual Student Household Contact/Mailing Information: WVDE’s WVEIS system captures contact/ mailing information for all students (regardless of selected learning model) enrolled in public schools. Students who attend private schools may have their contact information maintained in the statewide student eligibility system, or at the school level. In cases where eligibility information is maintained at the school level – WVDE will work with these private schools (9 in total) to obtain required information in a secure method.

Individual Student Learning Model (in-person, hybrid or virtual): WVDE’s WVEIS system incorporated indicators to capture individual student learning model. These indicators were in place and available to all public schools at the beginning of SY 2020-2021. County boards of education will update individual student learning models monthly.

Individual Student Attendance: WVDE’s WVEIS incorporated attendance codes that will afford West Virginia the opportunity to capture attendance information on individual students. In addition, WVEIS has a code in place to capture attendance information on individual students who have been quarantined due to COVID-19. This individual student attendance will allow WVDE to determine a child’s access or lack of access to meals at school.

Individual School Operational Dates: WVEIS has a built-in calendar feature that will allow counties to indicate closures due to COVID-19, inclement weather, or other extenuating

circumstances. This feature will allow West Virginia to capture individual school operational days and calculate P-EBT benefits for days in-person learning was unavailable.

The West Virginia Department of Health and Human Resources (DHHR) is the agency responsible for the statewide administration of SNAP; interpreting and enforcing federal regulations to ensure program integrity, issuing public assistance benefits; handling and tracking payment corrections; managing expungements; managing EBT processes and procedures; reporting issuances to FNS.

DHHR will also be responsible for providing program communication to county DHHR staff, SNAP households and the public. DHHR will receive data monthly from WVDE through a secured file. Eligibility data will be tested before each issuance. DHHR is responsible for P-EBT issuance to all SNAP and non-SNAP households. DHHR is responsible for all mass mailing. DHHR will coordinate effort with all parties to see P-EBT plan through administration and reporting, while issuing to all students who meet eligibility criteria.

A student's lack of access to free/reduced meals will be based on the amount of days the student was physically absent from school due to a number of circumstances. This information is collected through existing data infrastructure by county boards of education.

The school enrollment structure for SY 2020-2021 school year is based on a county or sponsor level. Not all counties are doing the same learning model across the board. For SY 2020-2021, West Virginia took the approach to address the unique needs of individual schools and students. Some students are 100% in-person, others are in a hybrid model (a blend of in-person and virtual/remote learning) and some are 100% virtual/remote learning. Once an enrollment model is chosen the student is typically locked into that model for the semester. Changes made are adequately captured by local program operator data entry into WVEIS.

Due to the varied learning model approach West Virginia understands the need to reevaluate eligibility for P-EBT benefit periods. Each month county boards of education will be required to send student data to WVDE (by the 5th of each month). This data will include the amount of days the student was not physically present in school. School absence could include the school being closed due to a COVID-19 outbreak or the child is a virtual/hybrid learner, etc. The data will also include SNAP and Foster designation. The data received will be used to calculate the total P-EBT benefit due to the student in two-month benefit periods. This information will be sent to DHHR for benefit issuance.

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.).
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response:

In response to COVID-19, WV DHHR created the County Alert System. The color-coded alert system tracks two metrics, infection rate and percent positivity at a county level. The county alert system assigns each county a color for the lower of the two metrics. This system was established to provide West Virginia residents with clear and consistent information regarding COVID-19 risk levels across the state. The County Alert System (and its historical data) is maintained by DHHR. The system can be found at <https://dhhr.wv.gov/COVID-19/Pages/default.aspx>.

Recognizing that county school systems and families needed ample time to plan for the following week, DHHR and WVDE developed the WV School Alert System. The WV School Alert System is guided by metrics developed by DHHR. Based on a five-color system – green, yellow, gold, orange and red – each county is assigned a color based on the prevalence of COVID-19 within their borders. The map is updated each Saturday at 5:00 PM and determines instructional

options and level of athletic/extracurricular activities permitted for each county for the entire week. The only exception to the Saturday determination is if a county becomes red at any point. Should a county become red, remote learning begins the following school day and athletic/extracurricular activities are immediately suspended.

The School Alert System (Saturday map) applies to students who have selected in-person learning. The Saturday map does not apply to students who are enrolled in virtual/eLearning. These models of instruction remain constant and are not dependent upon the status/color of the county. West Virginia strongly encourages private schools to follow the metrics set forth by the School Alert System. The WV School Alert System can be found at <https://wvde.us/school-reentry-metrics-protocols/>. Historical alert data is maintained by WVDE.

The combination of both alert systems and individual student data captured/maintained by WVEIS gives West Virginia the capability of confirming the status/duration of individual school closures, daily. The combined information will be captured daily and will be compiled/prepared monthly for DHHR.

In January 2021, Governor Justice issued a new Executive Order ending the School Alert System map. All in-person learners grades Kindergarten thru 8th will now attend in-person no matter color per county (so long as school is open). High school students will attend in-person so long as the county is not in red on the DHHR map. The School Alert system assisted in determining an initial benefit. For ongoing P-EBT months a student's individual attendance will determine the P-EBT benefit.

WVDE has 9 sponsors that are private schools and have agreements to operate the National School Lunch Program in the 2020-21 school year. An assigned coordinator within WVDE will maintain communication with the 9 sponsors. The 9 sponsors will be required to certify monthly their school's open/closed status and individual student attendance. This information will be necessary to determine private school students' P-EBT eligibility and benefit level(s).

Following the final June 2021 P-EBT issuance, if the state discovers it failed to issue P-EBT to any eligible student, or the student was under-issued the state will place these students on an exception file. Once all relative data is collected the student will be issued any P-EBT missed. The state will strive to correct agency errors.

West Virginia is operating under the simplified assumption that all students have met the 5-day benchmark due to Executive Order #68-20 delaying the school year start statewide from August 17th to September 8th. The state will not apply any ongoing simplified assumptions after the September 2020 benefit period.

Delayed Start Date due to Executive Order #68-20:

- A total of 11 benefit days will be calculated for all P-EBT eligible West Virginia students for the month of August 2020
- On July 8, 2020 Governor Jim Justice issued an Executive Order which prohibited all West Virginia schools from opening in any format, both public and private institutions
- WVDE reviewed all 55 counties scheduled school calendars for the Fall 2020 semester and found August 17, 2020 to be the average statewide start date. The state then

determined August 2020 benefit month to be equal to 11 benefit days for all eligible WV students enrolled in SY 2020-2021

- Part of September 2020 benefit month will follow an equitable logic. There were 4 school operation days that were delayed due to EO# 68-20
- Using the simplified assumption above, during the August/September 2020 benefit period all eligible students in WV will receive P-EBT equivalent to 14 benefit days (or \$95.48)

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 and a lunch 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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$6.82
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.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 these questions in detail.

Response:

West Virginia is proposing a daily P-EBT benefit of \$6.82 for each student who is unable to access school meals as a result of school closures or student's inability to attend (i.e. student was placed in quarantine by local health department) due to COVID-19. WV will be using individual student and school eligibility data as maintained and reported by WVEIS to determine eligibility and benefit levels for students enrolled in schools participating in NSLP.

The state will only apply simplified assumptions to the benefit period August/September 2020. An individual student's lack of access to school meals captured using the state data infrastructure will determine their ongoing eligibility/benefit level for P-EBT.

6. 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: West Virginia P-EBT Timeline school year 2020-2021

- Receive plan approval from FNS (Day 0)
- Activation of WV P-EBT call center (Day 1)

- Create training material(s) for DHHR/local boards of education/call center staff (Day 1)
- DHHR will create mass mailing for all P-EBT recipients (Day 2)
- Create joint agency press release (Day 7)
- P-EBT specific training begins for DHHR/local boards of education/WVDE contracted call center (Day 10-20)
- Public outreach campaign begins; P-EBT information goes live on platforms (Day 13)
- WVDE will begin creating eligibility file and prepare data for DHHR (Day 15-30)
- Local boards of education begin collecting/organizing individual student enrollment/school operation data for August/September 2020 benefit period (Day 20-30)
- WVDE sends August/September 2020 eligibility file to Optum (DHHR eligibility system operator) (Day 30)
- Optum begins testing file (Day 31-44)
- Local boards of education begin collecting/organizing individual student enrollment/school operation data for October/November 2020 benefit period (Day 31-58)
- Issue joint agency press release (Day 45)
- Issue P-EBT to all eligible students (both SNAP and non-SNAP) for the August/September 2020 benefit period (Day 45)
- Mail out P-EBT program informational letter to all eligible students (Day 45)
- P-EBT white cards begin being mailed to eligible students (Day 46)
- WVDE sends October/November 2020 eligibility file to Optum (Day 59)
- Local boards of education begin collecting/organizing individual student enrollment/school operation data for December 2020/January 2021 benefit period (Day 59-89)
- Create file for students who were missed during regular P-EBT issuance (Day 60)
- August/September 2020 benefit issuance reporting to FNS (Day 60)
- Issue P-EBT to all eligible students (both SNAP and non-SNAP) for the October/November 2020 benefit period (Day 73)
- October/November 2020 benefit issuance reporting to FNS (Day 73)
- WVDE sends December 2020/January 2021 eligibility file to Optum (Day 90)
- Local boards of education begin collecting/organizing individual student enrollment/school operation data for February/March 2021 (90)
- December 2020/January 2021 benefit issuance reporting to FNS (Day 103)
- Issue P-EBT to all eligible students (both SNAP and non-SNAP) for the December 2020/January 2021 benefit period (Day 104)
- WVDE sends February/March 2021 eligibility file to Optum (Day 120)
- February/March 2021 benefit issuance reporting to FNS (Day 120)
- Local boards of education begin collecting/organizing individual student enrollment/school operation data for April/May 2021 (Day 120)
- Issue P-EBT to all eligible students (both SNAP and non-SNAP) for February/March 2021 (Day 134)
- WVDE sends April/May 2021 eligibility file to Optum (Day 150)
- Issue P-EBT to all eligible students (both SNAP and non-SNAP) for April/May 2021 (Day 165)
- Exception issuance run; all eligible students who were missed during a P-EBT benefit period during the 2020-2021 school year will issue on this date (Day 195)
- April/May 2021 benefit issuance reporting to FNS (Day 200)

- Exception issuance run reporting to FNS (Day 211)

West Virginia has elected to issue new cards to all eligible P-EBT students during SY 2020-2021. When EBT cards were initially mailed for P-EBT in Spring 2020 WV had no indication that a second round of funding would become available; therefore, families were not instructed to keep the initial cards from Spring P-EBT benefit issuance. The state will issue P-EBT benefits on a unique P-EBT card design. Preliminarily, these will be white cards with P-EBT written on them. Both SNAP and non-SNAP households will receive the same cards. Cards/benefits will be issued in the name of the student. The state will issue one card per each student and not attempt to group student benefits with household logic.

P-EBT will not be loaded to the WV Mountain state EBT card. Both SNAP and non-SNAP households will receive the benefit. West Virginia will issue new P-EBT cards to all eligible students, regardless if the student receives SNAP or received P-EBT during SY 2019-2020.

West Virginia will not use DHHR eligibility data to issue P-EBT. Data received from individual county boards of education will be used to issue P-EBT. This will allow both SNAP and non-SNAP households to receive the benefit concurrently. P-EBT cards will be issued to eligible students and mailed to the guardian on file with WVDE.

P-EBT will be issued outside the eligibility system. It will be separated from SNAP. West Virginia will be able to distinguish the total amount of students and P-EBT benefits issued. There will be SNAP households that contain students who also receive P-EBT.

West Virginia's draw/spend priority is P-EBT, D-SNAP and SNAP in that order. The state currently expunges SNAP after 365-days of non-use or inactivity. The state practices first in, first out. The oldest unused SNAP benefit being removed first. WV will expunge unused P-EBT based on current SNAP rules. In 2021, all states are required to move from a 365-day expungement to 274-days. West Virginia is scheduled to make this transition September 1, 2021. For P-EBT, West Virginia will follow the same expungement rules that the state follows for SNAP (during that period).

West Virginia's EBT processor will provide a list of undeliverable cards – the processor will provide information that will allow the P-EBT team to identify specific families that need contacted regarding address/contact update. WV has elected to utilize the addresses provided by WVDE, with exception of students in Foster care. WV will rely on address/contact information for Foster students from DHHR's FACTs (Foster eligibility system). WVDE has begun corresponding with public school districts about the importance of ensuring accurate information is entered into WVEIS. This ongoing communication and correspondence will continue throughout the duration of P-EBT implementation.

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 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 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:

Customer Service/Communication Strategy:

WVDE and DHHR will leverage existing communication channels and conduct outreach to ensure messaging for P-EBT is cohesive, effective, and targeted. Information will be provided in the same manner to both SNAP and non-SNAP households through available and appropriate communication channels and through written communication accompanying the cards.

Both WVDE and DHHR will work together to compile press release information and social media posts. County boards of education will receive information and suggested content to share with their student communities through their regular communication channels (social media, robo-calls, text messages, apps. etc.). County DHHR staff will receive similar language to discuss with SNAP clients so that messaging is consistent across the agencies.

WVDE has a dedicated P-EBT email address (wvpebt@k12.wv.us) – the address is monitored by several staff members. Automatic response messages are provided with important information and updated regularly. Emails are monitored and timely responses are given to those who submit email questions, inquiries, or disputes.

WVDE also has a dedicated telephone number which is consistently monitored. At peak volumes, households are greeted with an automatic message that encourages households to leave a call-back number. A coordinator returns phone calls to provide dedicated customer service to research individual situations.

WVDE maintains a P-EBT web site that is regularly updated with public information. For SY 2020-2021 information will be provided that explains and connects CEP counties/schools, lists private schools participating in the NSLP, and general information about the School Alert System. WVDE seeks to provide a pull-down feature – where county-by-county monthly P-EBT total issuance can be accessible and transparent to the public.

For P-EBT SY 2020-2021, WVDE and DHHR are bidding out a remote call center to help triage calls and direct telephonic traffic. Many telephone calls received during the pandemic were from individuals who do not have children who qualify for P-EBT. A remote call center will be able to help navigate and carry these call inquiries to completion. The state will provide scripts/FAQs for phone traffic.

DHHR office of EBT has an email address and telephone number where individuals can call with questions that are relevant to the benefit issuance process. Also, DHHR's Office of Constituent Services is available 9 hours each business day offering SNAP households individual case

information.

An ongoing issue experienced during SY 2019-2020 were disputes regarding custody/guardianship. By applying lessons learned from Spring 2020 P-EBT, making the change to issuing P-EBT in the student's name and mailing the card to the guardian on file with WVDE, the state feels custody/guardianship issues should be resolved.

All public communication strategies listed in this plan will also serve as a basis for communication with those who are eligible for the benefit. Additionally, a letter of instruction will accompany cards explaining the terms, conditions, and other pertinent information with recipient households. Information provided will 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).

Serving Vulnerable Student Populations:

WVDE will communicate P-EBT guidance with schools and make information available to each Homeless Services Liaison within public school systems.

Representatives from West Virginia's Foster care system is involved in writing this plan. The greatest hurdle we must overcome with Foster students is rapid address changes. The state will rely on data provided by Foster care regarding the child's current address.

West Virginia serves a small number of SNAP recipients who primarily speak a foreign language. Spanish is the language with the highest percentage other than English spoken in West Virginia. This population is still very small compared to other states; Hardy county, WV has the highest population with 2.74%.

DHHR's interpreter service can be utilized for individual's who are eligibility/received a P-EBT benefit who need further information/instruction. DHHR and WVDE staff who are fluent in Spanish are available to interpret/communicate with individuals as well. P-EBT mass mailing will also be available in Spanish. In addition, a bidding requirement for the P-EBT contracted call center is capability with fluency of the Spanish language.

Students with disabilities will be served the same as those without disabilities. DHHR will make larger font available for households who need larger print notices. Both DHHR and WVDE locations are ADA compliant. The state will work with all individuals who need accommodations to access P-EBT benefits.

West Virginia's P-EBT 2.0 plan will not rely on social security numbers for benefit issuance. Social Security numbers are not a required data point to receive P-EBT. By not requiring an SSN, the state is not creating unnecessary barriers for students/families to overcome.

8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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:

West Virginia recognizes that USDA is responsible for ensuring accountability of funds for P-EBT purposes. West Virginia acknowledges that USDA may hold State agencies liable for aggregate over-issuances or improper payments. West Virginia acknowledges that 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.

P-EBT's authorizing statute does not give USDA or the states the authority to reclaim P-EBT issuances from households who received their benefits in good faith. In addition, SNAP regulations do not apply, and do not provide states with the authority to reclaim P-EBT benefits from households.

West Virginia will apply lessons learned from Spring 2020 P-EBT issuance. As a state we have determined that using WVDE's student enrollment data is a more comprehensive approach than utilizing DHHR data. WV agrees to be liable to all aggregate over-issuances and will strive to only issue correct payments based on student eligibility. By using WVDE's data the state is ensuring the guardian who has enrolled the student in school will receive the benefit for the student. The state remains committed to using all available resources to issue correct P-EBT payments.

9. 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.

Response:

West Virginia agrees to complete the FNS-292 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 SNAP agency (DHHR) and WVDE will work together as necessary to complete these reports.

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, 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.

Response:

West Virginia acknowledges that a separate grant application is required to cover State level administrative costs incurred during October 1, 2020 – September 30, 201 associated with implementing P-EBT. West Virginia also understands to receive a grant for administrative costs it must submit a budget plan using FNS-366(a).

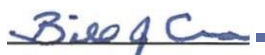
11. Release of Information

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

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



Signature
W. Clayton Burch
West Virginia State Superintendent of Schools



Signature
Bill J. Crouch, Cabinet Secretary
West Virginia Department of Health and Human Resources

Date of Request: *RII-6 3.2.02.1*

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



Signature
W. Clayton Burch
West Virginia State Superintendent of Schools



Signature
Bill J. Crouch, Cabinet Secretary
West Virginia Department of Health and Human Resources

Date of Request: February 3, 2021