



Government of the Virgin Islands of the United States

## DEPARTMENT OF HUMAN SERVICES

Office of the Commissioner

September 22, 2023

Matthew Henschel  
SNAP Regional Division  
Director USDA/FNS  
Northeast Regional Office  
10 Causeway Street, Room 501  
Boston, MA. 02222

Dear Director Henschel:

I am requesting approval of the attached request to issue P-EBT Benefits to eligible children in childcare for 2022-2023 for the United States Virgin Islands Department of Human Services (VIDHS).

The attached P-EBT document outlines the Territory's plan to ensure that families with eligible children in school receive this benefit. VIDHS continues its commitment to aid members in our community as well as those made vulnerable because of this pandemic. VIDHS will issue regular public service announcements as well as make guest appearances on local radio broadcasts regarding P-EBT. A P-EBT flyer will be available on our DHS social media outlets (i.e., Facebook, Instagram, LinkedIn) and our VIDHS website.

On behalf of my VIDHS Division of Family Services SNAP team, I would like to express our appreciation for the continued support and cooperation received from you and your staff at the Northeast Regional Office (NERO). If you have any questions, please do not hesitate to call me at (340) 642-8817.

Sincerely,

  
Kimberley Causey Gomez, MSW  
Commissioner

cc: Denelle G. Baptiste, Assistant Commissioner  
Natalie L. Bailey, SNAP Administrator  
Emmanueline Archer, SNAP Territorial Director

Attachment

**State Plan for Pandemic EBT  
Children in Childcare 2022-2023**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in Child Care, 2022-2023
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	September 8, 2022
<b>Replaces:</b>	N/A
<b>Summary:</b>	(1) This document is a template to assist states in the development of state plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2022-2023. (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 State Guidance on Coronavirus P-EBT: [Click Here](#)*

*The submission of a P-EBT state plan, associated template, and related reporting obligations are addressed in OMB# 0584-0660, Pandemic Electronic Benefit Transfer (P-EBT), expiration 11/30/2023.*

**State Plan for Pandemic EBT**  
**Children in Childcare 2022-2023**

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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- 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. 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
- e. Names of state agencies involved in administering this plan.

**Response:**

- a. The *date range* covered by this state plan or amendment for children in childcare is August 2022 through May 2023. USVI may expect a significant increase or decrease in these data points and is committed to inform USDA of any significant changes during the date range covered by this initial plan.
- b. Estimated monthly and total amount of P-EBT benefits the state will issue within this plan/amendment's date range to non-school children in childcare **\$ 127,724.85**

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<sup>1</sup> 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 2022 through June 2023, for example).

- c. Estimated total ***number*** of children to which the state will issue P-EBT benefits to children in childcare ***3195***
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

USVI will tentatively issue benefits to children in childcare during the week of December 18, 2023

- e. Names of state agencies involved in administering this plan.

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

- US Virgin Islands Department of Education (VIDE) as well as eligible Private Schools are responsible for confirming student’s eligibility for P-EBT by monitoring and collecting student learning mode classifications.
- US Virgin Islands Department of Human Services (VIDHS) is responsible for the administration of the P-EBT program to include processing files received from school entities, sending files to FIS for benefit issuance, notifying clients and general public about the P-EBT process, issuing replacement cards and operating Customer inquiry center.
- Fidelity Information Services (FIS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and notification on how to use the card to new 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 School Children (see Q&As #7-25)**

##### **A. Eligible Children**

USVI will submit a State Plan for Pandemic EBT for School Children 2022-2023 separately.

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2021-2022, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application *and* the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?<sup>2</sup> 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g., which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition,

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<sup>2</sup> The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

please describe any proposed measures that the state will take to address program integrity when using the proposed simplifying assumptions. (Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)

**Response:**

## **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 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:**

## **5. P-EBT for Children in Child Care (see Q&As #26-33)**

*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.

There are no changes for P-EBT for children in childcare from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44<sup>3</sup>. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue

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<sup>3</sup> The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children's eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- 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 #30)
- 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 those children's eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
  - the child's child care facility is closed or is operating with reduced attendance or hours, or
  - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the state will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

**Response:** USVI will assume all children under the age of 6 (as of August 2022) 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 September 2022 through May 11, 2023 P-EBT period during the week of December 18, 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, 2022, that received SNAP benefits anytime from September 2022 through May 11, 2023. 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 11, 2023, 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 2022 and not attending school. USVI understands that children who are 6 years old or older on August 1, 2022, in SNAP households are not eligible for PEBT benefits for children in childcare. These children may be eligible for PEBT benefits if they are attending an NSLP-participating school for SY 22-23 and had absences related to COVID-19.
- The COVID 19 Public Health Emergency ended on May 11, 2023. Children from households who applied for SNAP from May 1 through May 11, 2023, are eligible for May 2023 P-EBT benefits. The household can be approved for SNAP after May 11, 2023, but must have applied for SNAP between May 1 through May 11, 2023. Households that applied for SNAP on May 12, 2023, or later, would not be eligible for May 2023 benefits.

## 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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

**Notes:**

1. Lunch rates include the 8 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
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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:**

**Setting Benefit Levels Using the CACFP Data Method**

- USVI will set an average monthly P-EBT benefit amount for SY 22-23. The averages are calculated using the following three factors:
  1. The reduction in aggregate lunch claims over SY 22-23 relative to the same months from SY 19-20 and SY 18-19. USVI and FNS will agree on which months to use in their calculation closer to the benefit issuance date. At a minimum, these months will include December 2022 through March 2023, as compared to lunch claims in these same months pre-pandemic.
  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 month. This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.
  3. The school year 2022-2023 P-EBT benefit per day is \$9.45.

Table 1: Reduction in CACFP Lunch Claims—SY 22-23

CACFP Lunch Claims		CACFP Lunch Claims		Percent Change, SY 22-23:
Pre-pandemic Months		Pre-pandemic Months		
September 2019	12,653	September 2022	TBD	To be applied to daily rate and number of school instructional days per month
October 2019	17,401	October 2022	TBD	
November 2019	14,506	November 2022	TBD	
December 2019	13,895	December 2022	TBD	
January 2020	15,914	January 2023	TBD	
February 2020	18,271	February 2023	TBD	
March 2019	17,928	March 2023	TBD	
Total	123,959	Total	TBD	TBD%

Average monthly P-EBT childcare benefit, fall and spring semesters table:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Operating Days per Month	Number of Months in SY	Daily Benefit Amount	Average Monthly Benefit
September 2022-April 2023	TBD	17	8	\$9.45	
May 1- May 11, 2023	TBD	8.5	1	\$9.45	

\*only for months where claims in SY 22-23 are below claims in SY 18-19 or 19-20, as applicable

## 7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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 past years, 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 P-EBT issuances for previous school years. 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.
- 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 September 25, 2023
  - State Plan is approved.
- Week of December 4, 2023
  - User Acceptance Testing completed.
  - Public Awareness Campaigns
- Week of December 11, 2023
  - DHS contractor to implement P-EBT program changes.
  - DHS contractor to inform FIS the issuance schedule and expected number of records and benefit amount.

- Week of December 18, 2023
  - Issue September 2022 to May 2023 PEBT benefits for non-school SNAP children in childcare.
  - 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 previous implementation of P-EBT. Current SNAP households will receive their P-EBT benefits on their SNAP EBT card. Previous non-SNAP P-EBT recipients will receive their P-EBT benefits on their unique P-EBT card. New non-SNAP P-EBT recipients will receive benefits on a newly issued P-EBT card mailed directly from the EBT vendor, FIS.

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

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

Undeliverable cards will be returned to the SNAP Issuance offices on the islands of St. Croix and St. Thomas. Cards will be logged, and the student’s name provided to the call center for customer service and outreach purposes.

Previous P-EBT recipients will not automatically receive a new card. Lost, damaged, or stolen cards can be replaced over the counter, by the EBT Technician once the parent/legal guardian is identified in the school file and presents an acceptable photo ID.

## 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.

***To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -***

- 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 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 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:** The USVI will continue to utilize and publish the PEBT Territorial Number (340) 772-7120 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 provided by the school districts. In instances where the employee is unable to locate a child in their records, the family will be referred to their respective schools where issues of eligibility can be more easily determined. Moreover, the DHS Commissioner will be a featured Presenter on Governor's Weekly Press Briefing and will also host a Facebook Live to announce issuance of PEBT Card/EBT Card for SNAP recipients, PEBT Hotline, etc.

USVI will provide access for individuals who speak Haitian Creole and Spanish to report their concerns. Based upon the issue reported, the USVI will refer the customer to a specific contact at VIDE or private school, to submit or resubmit updated information as part of the verification process.

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, VI Department of Human Services and Department of Education websites.

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
- h. For non-SNAP P-EBT recipients, directions on how to PIN their card will be added.

## **9. Over-issuance of P-EBT benefits**

*To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.*

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. USVI 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 commits to inform USDA of any over-issuance via the spread sheet that FNS sent to all states.

**10. 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.

**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, 2022 through September 30 2023. 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.”

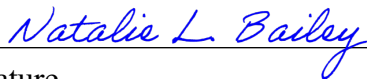
**13. Civil Rights Statement**


USVI will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient and provide equal access to individuals with disabilities.

**14. 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 and Child Nutrition State Agency Officials:**

  
\_\_\_\_\_  
Signature  
Natalie L. Bailey, Administrator

  
\_\_\_\_\_  
Signature  
Kimberley Causey Gomez, Commissioner- VI DHS

**Date of Request:** 22 September 2023