

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

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

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

1. **State:** New Jersey

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

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

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

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

Response:

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.

New Jersey’s P-EBT plan amendment for the 2020-2021 school year covers the period of October 1, 2020 through September 30, 2021 for children in school and in child care. New Jersey’s P-EBT plan for SY 2020-2021 through September 30, 2020 was initially approved on September 18, 2020 and covered a period of September 8, 2020 through September 30, 2020 for school children. This current plan submission serves as an amendment of the approved plan to apply a consistent standard for benefit calculation and issuance for those months and the period from October 1 through the rest of SY 2020-2021. This current plan submission also serves as an amendment of the approved plan to issue a retroactive supplement issuance for the difference of the new daily rate and the previous daily rate to children who already received a September P-EBT benefit. New Jersey’s P-EBT plan for the 2019-2020 school year initially approved on May 8, 2020 with an amendment approved on July 16, 2020 continues to account for correcting errors for eligible children during this period.

New Jersey estimates issuing \$74,553,999 monthly in P-EBT benefits and \$670,985,992 P-EBT benefits in total within this plan amendments date range. It is estimated that \$184,992,597 will be issued to school children in SNAP households and \$369,985,195 to school children in non-SNAP households. It is estimated that \$116,008,200 will be issued to non-school children in child care. Please see the below chart for aggregate cost estimates.

New Jersey estimates issuing P-EBT benefits to 951,000 children in the state. It is estimated that 282,000 will be school children in SNAP households and 564,000 will be school children in non-SNAP households. It is estimated that 105,000 will be non-school children in child care. Please see the below chart for aggregate cost estimates.

Month of Issuance	Total Estimated P-EBT Issuance Amount	Estimated SNAP School Children Issuance Amount	Estimated Non-SNAP School Children Issuance Amount	Estimated Child Care Issuance Amount
September 2020	\$58,626,420	\$19,628,072	\$38,998,348	
October 2020	\$74,035,751	\$20,279,520	\$40,559,040	\$13,197,191
November 2020	\$67,620,338	\$18,062,523	\$36,125,047	\$13,432,767
December 2020	\$79,353,098	\$21,864,555	\$43,729,111	\$13,759,432
January 2021	\$83,802,751	\$24,123,248	\$48,246,496	\$11,433,007
February 2021	\$73,266,770	\$20,517,220	\$41,034,440	\$11,715,110
March 2021	\$69,245,288	\$19,089,689	\$38,179,379	\$11,976,220

New Jersey estimates a total amount of \$1.6 million in administrative funds needed to complete the work described in this plan amendment.

New Jersey estimates 199,000 children in SNAP households and 331,000 children in non-SNAP households totaling 530,000 children that received the September P-EBT issuance at the \$5.86 rate will now receive a supplement of \$16.32 per child (\$0.96 difference for 17 school days in September). It is estimated that \$8,649,600 in total supplement benefits will be issued.

School data will be requested on a monthly basis for submission by the 10th of the following month of eligibility. After the 10th of the month, the data will go through multiple systematic processes for benefit issuance on or about the 20th of every month. Non-school children in child care and school children in SNAP households will have benefits available on the Families First Electronic Benefits Transfer (EBT) card on or about the 20th of the month. School children in non-SNAP households will have benefits issued to an existing or newly issued P-EBT card, as applicable, within 2 calendar days after issuances to SNAP households.

New Jersey is committed to informing USDA of any significant increase or decrease in these data points during the October 1, 2020-September 30, 2021 dates covered by this initial plan.

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 for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- 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).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response:

The New Jersey Department of Agriculture’s Division of Food and Nutrition (NJDA) is the State agency responsible for the administration of federal school nutrition programs in New Jersey including eligibility for free- or reduced-price school meals through the National School Lunch

program. The New Jersey Department of Education (DOE) is the State agency responsible for approving and monitoring school district reopening plans and operating statuses. The New Jersey Department of Human Services' Division of Family Development (DHS DFD) is the State agency responsible for the administration of the Supplemental Nutrition Assistance Program (SNAP) which is supervised by the State agency and administered through the local County Boards of Social Services (BSS). DFD is also responsible for the issuance of P-EBT benefits and, through the contracted EBT vendor and BSS, the issuance of P-EBT cards and replacements, as well as customer service support.

NJDA will provide all School Food Authorities (SFAs) and applicable out-of-district (OOD) placements with submission instructions for reporting all students with an approved application for free- or reduced-price school meals with the National School Lunch Program (NSLP) or directly certified, or enrolled in a Community Eligibility Provision school (or a school operating under Provisions 2 or 3) who did not receive free- or reduced-price meals at the school because the school was closed or has reduced attendance/hours for at least 5 consecutive days. SFAs are relying primarily on school year 2019-2020 free- and reduced-price eligibility determinations since most have not been accepting and processing school meal applications. However, SFA will make applications available to families of new students and any family who is newly income eligible for free- and reduced-price school meals in SY 2020-2021. DFD recognizes that a school district that participates in NSLP may send a student(s) approved for free- or reduced-price meals to an OOD placement due to the needs of the student. Such children are eligible for P-EBT if the sending school participates in the NSLP, determined the child eligible for free-or reduced-price meals, meal service is included in the contract, and the student did not receive free- or reduced-price meals at the school because the school was closed or had reduced attendance/hours for at least 5 consecutive days. The OOD placement is responsible for reporting the eligible student's attendance. Since no State agency maintains all of this data, the SFAs, or OOD placements where applicable, will be responsible for determining/confirming each child's eligibility for free- or reduced-price meals in public and non-public schools and the number of days the child did not receive a school meal. This will determine which P-EBT benefit amount is appropriate to issue. This process for eligibility and submission will also ensure that only currently active students are issued benefits (e.g. excluding 2019-2020 graduates and other ineligible students). SFAs, or OOD placements where applicable, will submit this information for existing and newly eligible students (e.g. kindergarteners and transfer students). SFAs, or OOD placements where applicable, are also responsible for confirming each child's lack of access to meals at school prior to submitting the student data to DFD. This process for the SFAs, or OOD placements where applicable, does not vary for SNAP and non-SNAP recipients. DFD will perform a data matching process to identify SNAP-recipient children submitted by the SFAs, or OOD placements where applicable.

DOE will provide DFD with a copy of its Executive County Superintendent (ECS) reopening plan dashboard of district schedules as it is regularly updated but no less frequently than on a bimonthly basis. DOE recognizes four types of operating schedules: in-person, remote, hybrid (defined as all schools operating with in-person and remote learning), and combination (some schools are hybrid and some are remote). For the purposes of the plan, students in combination schools may be assigned the virtual or hybrid benefit amount according to their attendance status. Although a school may be officially categorized as one of these four schedules, Governor Murphy's Executive Order 175 requires school districts to provide a remote learning option for parents or guardians who request it

for their children. Therefore, SFAs, or OOD placements where applicable, remain ultimately responsible for determining eligibility and providing student data.

New Jersey proposes to use simplifying assumptions to issue two benefits amounts per month:

- (1) P-EBT eligible students are engaged in remote learning for 18 school days per month; or
- (2) P-EBT eligible students are engaged in hybrid learning for 9 school days per month.

There are more than 700 public school districts and several hundred private schools in New Jersey; therefore, it is not feasible to survey all or a representative sample to determine an average number of virtual learning days or obtain schedules for hybrid schools. As an alternative, NJ proposes to use the ECS reopening plan dashboard provided by DOE as justification for the use of these simplifying assumptions. DOE's data indicates there were four accepted district reopening plans in NJ: in-person, remote, hybrid, or combination (reflecting a cohort of remote and a cohort of hybrid). Students must engage in 180 calendar days of learning in the school year. New Jersey proposes to average the remaining 163 school days (excluding the 17 days in September for which benefits were already issued under the previously approved plan) over the remaining 9 months of the school year which results in an average of 18 school days per month. This plan represents a reasonable reflection of best feasibly available data throughout the school year.

NJ is able to address program integrity for the proposed simplifying assumptions by using DOE's ECS reopening plan dashboard as a source of validation for the hybrid and remote schedules and the student data including number of eligible days of attendance provided by the SFA, or OOD placements where applicable. This ensures that students receive an appropriate benefit amount and that the benefit amounts proposed are uniform and reasonable.

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:

DOE is responsible for approving and monitoring changes in the school district reopening plans and operating statuses. DOE will provide DFD with a copy of its ECS reopening plan dashboard as it is regularly updated but no less than on a bimonthly basis. DOE recognizes four types of operating schedules: in-person, remote, hybrid (defined as all schools operating with in-person and remote learning), and combination (some schools are hybrid and some are remote). For the purposes of the plan, students in combination schools may be assigned the virtual or hybrid benefit amount according to their attendance status. Although a school may be officially categorized as one of these four schedules, Governor Murphy's Executive Order 175 requires school districts to provide a remote learning option for parents or guardians who request it for their children. In addition, eligible children may be engaged in remote learning due to COVID-19 quarantine requirements due to individual household suspected or confirmed exposure. Therefore, SFAs, or OOD placements where applicable, remain ultimately responsible for confirming the child's school has been closed or is operating with reduced attendance/hours for a minimum of 5 consecutive days. The SFA, or OOD placements where

applicable, is also responsible for determining eligibility based on that school's and/or child's operating schedule.

SFAs, or OOD placements where applicable, will submit eligible student data on a monthly basis by the 10th of the following month of eligibility to a secure State-operated and managed online platform. SFAs, or OOD placements where applicable, will upload a file of eligible students for a particular month of P-EBT benefit issuance. This will ensure information is up-to-date and accurate at the time of submission. Schools may submit data after the 10th including untimely submissions as well as corrections for previously submitted data and DFD will process as quickly as possible, but no later than by the next issuance cycle. DFD will use updated school information submissions and run a systematic process to check for duplicates and previous issuances to determine a revision in issuance amount. That difference in issuance amount will be issued accordingly. Over-issuances will follow the procedures described in Section 8 of this plan.

New Jersey proposes to use simplifying assumptions to issue two benefits amounts per month:

- (1) P-EBT eligible students are engaged in remote learning for 18 school days per month; or
- (2) P-EBT eligible students are engaged in hybrid learning for 9 school days per month.

There are more than 700 public school districts and several hundred private schools in New Jersey; therefore it is not feasible to survey all or a representative sample to determine an average number of virtual learning days or obtain schedules for hybrid schools. As an alternative, NJ proposes to use the ECS reopening plan dashboard provided by DOE as justification for the use of these simplifying assumptions. DOE's data indicates there were three accepted district reopening plans in NJ: in-person, remote, or hybrid. Students must engage in 180 calendar days of learning in the school year. New Jersey proposes to average the remaining 163 school days (excluding the 17 days in September for which benefits were already issued under the previously approved plan) over the remaining 9 months of the school year which results in an average of 18 school days per month. This plan represents a reasonable reflection of best feasibly available data throughout the school year.

NJ is able to address program integrity for the proposed simplifying assumptions by using DOE's ECS reopening plan dashboard as a source of validation for the hybrid and remote schedules and the student data including number of eligible days of attendance provided by the SFA, or OOD placement where applicable. This ensures that students receive an appropriate benefit amount and that the benefit amounts proposed are uniform and reasonable.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- 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?
- 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 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.)
- 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:

DFD proposes the following simplifying assumptions:

- (1) All children under the age of 6 in a SNAP household are eligible for a P-EBT benefit. DFD plans to issue benefits to all SNAP children under age 6 in an area where schools are closed or have reduced attendance or hours; and
- (2) All children under age 6 in a SNAP household are unable to receive free or reduced price school meals for more than 9 days each month.

New Jersey must make the first simplifying assumption due to the more than 4,000 licensed child care centers (LCCC) in the state and administratively burdensome task to survey their operating schedules on any sampling basis. As an alternative set of data, the ECS reopening plan dashboard provided by DOE for the months of September through January confirm that for each month, every county in New Jersey has had a district with schools that were closed or operating with reduced attendance/hours. Thus, DFD can qualify that based on county data, every child under the age of 6 in a SNAP household, by residence or the child and/or the location of the child care facility, was in the area of a school that was closed or operating with reduced hours or attendance and meets the criteria for P-EBT eligibility for children in child care. To ensure each child continues to meet P-EBT eligibility, DOE will provide DFD with a copy of its ECS reopening plan dashboard as it is regularly updated but no less than on a bimonthly basis.

New Jersey is able to justify the second simplifying assumption based on available LCCC data. The COVID-19 pandemic continues to adversely affect LCCCs in the State. The centers are a critical resource to parents but remain at less than full operating capacity. As of February 2021, 25% of LCCCs remain closed statewide and capacity has also decreased by 25% statewide. In terms of actual attendance, the rate of children actually attending child care each day and a full day is less than capacity as ongoing exposure to the virus results in closures and quarantines. Therefore, NJ can assume that nearly all eligible children in LCCC would have more than 9 days of reduced attendance or hours and the P-EBT benefit amount at the remote learning rate standard monthly amount of \$122.76 would be reasonable to issue to all SNAP children under age 6 in a child care facility based on available data. However, in the even that there are no schools in a county in a particular month operating a fully virtual schedule, but at least one school is operating a hybrid schedule, New Jersey will issue the hybrid benefit.

As the state agency administering SNAP benefits, DFD holds all SNAP caseload data. DFD will identify eligible children by querying its eligibility system records ongoing on a monthly basis for all children under the age of 6 in a SNAP household for the prior month (e.g. on February 10th, query system files for January caseload data). All children under the age of 6 in a SNAP household for that month of issuance will be included in the benefit issuance file for processing. In case the child's information may have been submitted by a school for the same month, systems will run a duplicate file check to ensure such children only receive one benefit. DFD plans to issue P-EBT benefits for non-school children in SNAP households on a monthly basis at the time that school-children on SNAP are issued their P-EBT benefits. Administratively, the process runs at the same time and will cause less confusion to SNAP households if they receive benefits for all of their eligible children at one time. This process will also create a clear and simple message in communications to P-EBT participants for SNAP households.

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

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

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- 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:

New Jersey proposes to issue two benefit levels of \$122.76 and \$61.38 for school children based on 18 or 9 days of eligibility. As such NJ will use simplifying assumptions to issue two benefits amounts per month:

- (1) P-EBT eligible students are engaged in remote learning for 18 school days per month; or
- (2) P-EBT eligible students are engaged in hybrid learning for 9 school days per month.

These simplifying assumptions are necessary as it is not feasible to survey all or a representative sample of the more than 700 public school district and several hundred private school districts in New Jersey to determine an average number of virtual learning days or obtain schedules for hybrid schools. As an alternative, NJ proposes to use the ECS reopening plan dashboard provided by DOE as justification for the use of these simplifying assumptions. DOE's data indicates there were four accepted district reopening plans in NJ: in-person, remote, hybrid, or combination (reflecting a cohort of remote and a cohort of hybrid). Students must engage in 180 calendar days of learning in the school year. New Jersey proposes to average the remaining 163 school days (excluding the 17 days in September for which benefits were already issued under the previously approved plan) over the remaining 9 months of the school year which results in an average of 18 school days per month. This

plan represents a reasonable reflection of best feasibly available data throughout the school year.

New Jersey also proposes to use one standard benefit amount for P-EBT issuance for non-school children in SNAP households. The remote learning standard benefit of \$122.76 will be used for non-school children in SNAP households. It is necessary to use the one standard benefit amount at the remote learning rate because operating LCCCs have not returned to pre-pandemic numbers. Up to 35% of LCCCs in some counties have not reopened and licensed capacity of those that have reopened has decreased up to 40%. In terms of actual attendance, the rate of children actually attending child care each day and a full day is less than capacity as ongoing exposure to the virus results in closures and quarantines. Therefore, NJ can assume that nearly all eligible children in LCCC would have more than 9 days of reduced attendance or hours and the P-EBT benefit amount at the remote learning rate standard monthly amount of \$122.76 would be reasonable to issue to all SNAP children under age 6 in a child care facility based on available data. However, in the event that the county of residence for SNAP children under age 6 does not have at least one school that is closed or offering only distance learning to students but there is at least one school in the county that is offering mixed in-person/distance learning, then all SNAP enrolled children under age 6 in that county will receive the standard hybrid benefit of \$61.38.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

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

Response:

New Jersey anticipates the following implementation plan for P-EBT issuance.

Day 0: USDA/FNS approves P-EBT plan.

Day 1-30: Public notice campaign begins.

Day 30: New Jersey's secure online portal for school submission is live.

Day 31-45: NJDA and DOE notify SFAs and OOD placements of the online submission process and provide instructions.

Day 31-60: SFAs, or OOD placements where applicable, begin to submit student data for the previous months of eligibility for newly eligible students from September 2020 (NJ previously issued September 2020 benefits to eligible students who received a benefit in SY 2019-2020) through the month prior to the current month. For example, if the current month is March 2021, SFAs, or OOD placements where applicable, will submit eligible student data for September 2020 through February 2021.

Day 60-70: DHS works with vendors to process the student data.

Day 71: Issuance to SNAP households.

Day 73: Issuance to non-SNAP households.

Benefits for SNAP and non-SNAP households for ongoing issuances will continue thereafter as previously described with SFA, or OOD placements where applicable, submissions by the 10th of the following month. DHS' contracted vendors will process the data and benefits will be issued on or around the 20th of the month. Generally, SNAP households will receive their benefit first and non-SNAP households will have their benefits issued within 2 calendar days after that.

DHS' EBT processor will issue P-EBT benefits for non-SNAP households on a unique P-EBT card. Existing non-SNAP P-EBT households will receive new P-EBT cards as it is anticipated many non-SNAP households may not have the previously issued card any longer. New Jersey will continue to use a P-EBT sub-benefit type on EPPIC for P-EBT issuances. P-EBT will be the draw/spend priority. The same expungement rules currently followed for SNAP will be utilized for P-EBT. Undeliverable P-EBT cards will be returned to the EBT processor for logging and destruction. Replacement cards are handled at the local BSS who are also provided with a list of P-EBT cases by DFD for reference. Instructions on the P-EBT dedicated webpage direct and link P-EBT participants to their local BSS should they need a replacement card.

8. Customer Service

Recommended Standard for Household Support

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

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

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

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

Response:

As part of its public information campaign, DHS DFD will employ the use of press releases and social media to inform the general public about the P-EBT program, eligibility requirements, and the need to follow-up with their school regarding eligibility and inclusion. In addition, DFD has worked with its contracted Outreach agencies and community advocates to inform groups with potential access problems about the program and messaging language through various means (e.g. social media, website, robo-calls, and text messages). The SFAs and OOD placements also receive this information as a resource for connecting to homeless and foster children, children with limited English proficiency or no/limited internet access, and persons with disabilities.

To meet the customer service need, DFD has implemented a P-EBT dedicated webpage to provide current information and frequently asked questions (FAQs). The website provides general information to the public and school officials as well as information directed to P-EBT participants as SNAP-recipients and non-SNAP recipients. The P-EBT dedicated webpage advises that benefits are for the intended children (non-transferrable) and that benefits received in error should not be accessed and to report it to the BSS and/or return it to the address on the back of the card. If P-EBT participants are in need of further support not addressed through the FAQs such as to resolve disputes or issuance errors, they may complete an online inquiry form that is transmitted to a dedicated P-EBT email address staffed by DFD. DFD has dedicated staff, including bilingual representatives, who respond to P-EBT inquiries online or through DFD's main hotline number to provide further assistance. P-EBT participants may also contact their local BSS for assistance with replacement P-EBT cards.

Upon issuance of the P-EBT card, participants receive a mailer/buck slip that provides information about P-EBT. The mailer explains the following:

- A description of the P-EBT program;
- The purpose of the benefits issued to them;
- How to activate/PIN the card;
- Where the card can be used;
- An explanation of what can be purchased with the benefits; and
- The State's website address for more information.

This information is also available on the P-EBT webpage for access by SNAP participants and reference for non-SNAP participants who may not have received the P-EBT card or lost the mailer/buck slip.

9. Over-issuance of P-EBT benefits

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

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

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

Response:

DFD's systematic benefit issuance process involves data matching and duplicate issuance review to ensure eligible students receive the correct amount of P-EBT benefits. DFD's IT team retains master issuance files of children that have received P-EBT benefits with their allotment issuance amounts. All student data is cross-checked against previous master issuance files for duplicate issuance. Upon completion of this duplicate issuance process, a summary of the findings is presented to authorized DFD staff for review. Identified duplicates are itemized for DFD review. Upon approval for issuance, the file is then transferred to the EBT vendor for issuance.

SFAs and OOD placements are directed to immediately report any data submissions for ineligible children. The P-EBT webpage also provides instructions to P-EBT recipients who believes they may have received benefits in error. DFD logs over-issuances reported by school personnel, BSSs, and parents. In the event that benefits are issued erroneously, the State agency may take measures to account for the over-issuance such as inactivating the P-EBT card if all benefits issued were an over-issuance, canceling only the P-EBT issuance amount on the SNAP EBT card, or directing parents to not use the benefits and return the P-EBT card to the address on the back of it. In no event shall the household's SNAP benefit be reduced to reclaim P-EBT benefits.

10. Benefit Issuance Reporting

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

11. Administrative Funding

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

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

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

12. Release of Information

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

13. Civil Rights Statement

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

14. Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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

Natasha Johnson
Assistant Commissioner
New Jersey Department of Human Services

Rose Tricario
Director
New Jersey Department of Agriculture

Date of Request: Rev 4-15-21