

Pandemic EBT: School Aged State Plan
Submitted: June 2, 2021

1. **State:** California
2. **Primary Citations:** Families First Coronavirus Response Act; Continuing Appropriations Act, 2021 and Other Extensions Act; Consolidated Appropriations Act, 2021
3. **Executive Summary:**

As provided by the Consolidated Appropriations Act, 2021, California's Pandemic EBT (P-EBT) plan for School Year (SY) 2020-21 relies on the use of simplifying assumptions to establish P-EBT eligibility and benefit levels. This plan is for school aged children.

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

- The California Department of Education (CDE), in collaboration with county offices of education, local school districts, and both public and private schools, is responsible for determining P-EBT eligibility for school aged children. For child care aged children, the CDE will provide information on school closures, reduced hours, and learning models to support the determination of P-EBT eligibility.
- The California Department of Social Services (CDSS) is responsible for determining P-EBT eligibility for child care aged children and for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, and the provision of customer service and support.

Date Range

The date range covered by this plan is August 2020 through May 2021.

Estimates

The upper-bound estimates of P-EBT issuance during the date range covered by this plan are as follows. The State commits to informing the US Department of Agriculture (USDA) of any significant increase or decrease in these estimates during the date range covered by this plan.

Estimated Total School Aged Children Served

The estimated total *number* of school aged children to which California will issue P-EBT benefits is approximately 4,000,000

- Estimated number of school aged children in SNAP households is 1,500,000
- Estimated number of school aged children in non-SNAP households is 2,500,000

Estimated Total Children Served & Monthly Issuances

Monthly Issuances

August 2020 to May 2021: \$492,000,000 (total number of P-EBT eligible children (4,000,000) multiplied by the proposed benefit of \$123 per month)

Total Issuances

August 2020 to May 2021: \$4,920,000,000 (total number of P-EBT eligible children (4,000,000) multiplied by the proposed benefit of \$123 per month over 10 months)

Estimated Grand Total: \$4,294,000,000¹

Tentative P-EBT Issuance Schedule:

Tentative Issuance Schedule P-EBT for School Aged Children													
P-EBT Benefit Month													
Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Mailing & Issuance
New Cards Only													August to September
						Second Issuance							November
										TBD			TBD

4. P-EBT for School Aged Children

A. August/September 2020 Supplements and Newly Eligible Children for Those Months

California was approved to issue P-EBT benefits for the months of August and September 2020 to school aged children who had:

- (1) previously been issued P-EBT benefits for the months of March, April, May and/or June 2020; and
- (2) either:
 - a) attended a school in the 2019-2020 school year that is providing solely virtual instruction for the months of August and September 2020; or
 - b) were confirmed to currently be attending virtually a school that offers both virtual and in-person attendance, as outlined in the P-EBT qualifying school scenarios described in the State's approved P-EBT plan amendment.

¹ Note that nearly \$626 million of P-EBT benefits have already been issued to eligible school aged children for the months of August and September 2020 and has therefore been subtracted from this total.

Due to limited data availability, children newly eligible for free or reduced-price meals (FRPM) for SY 2020-21 were not included in California's previously approved P-EBT plan amendment for the months of August and September 2020. Additionally, that State will include children who were recently issued P-EBT benefits for SY 2019-20 under an amendment to California's SY 2019-20 plan (approved by USDA on April 8, 2021) and about 100,000 students who were previously issued P-EBT benefits for SY 2019-20 but did not receive benefits for the months of August and September 2020 because of missing SY 2020-21 enrollment data.

Finally, children previously issued P-EBT benefits for the months of August and September 2020 will be issued a supplement to reflect the new P-EBT reimbursement rate of \$6.82 per day. Under California's approved P-EBT plan amendment, August and September 2020 benefits were issued at a reimbursement rate of \$5.86 per day. Accordingly, a supplement of \$0.96 per day will be provided.

Under this new plan, California seeks approval to (1) "make whole" all P-EBT eligible children not already provided benefits for August and September 2020 and (2) issue supplements to children already provided benefits for August and September 2020 so that all P-EBT eligible children receive the maximum amount of P-EBT benefits they are eligible to receive for August and September 2020.

To recap, California will:

- Issue August and September 2020 P-EBT benefits to children recently issued P-EBT benefits for SY 2019-20 under California's SY 2019-20 plan amendment approved by USDA on April 8, 2021.
- Issue August and September 2020 P-EBT benefits to children who were previously issued P-EBT benefits for SY 2019-20 but did not receive benefits for the month of August and September 2020 because of missing SY 2020-21 enrollment data at the time of USDA's approval.
- Issue August and September 2020 P-EBT benefits to children determined newly eligible for FRPM for SY 2020-21.
- Issue August and September 2020 supplements to children previously issued P-EBT benefits for August and September 2020.

B. Eligible Children

The CDE will create a "master list" of FRPM eligible children enrolled at an LEA for SY 2020-21, including state special schools, or private schools approved to operate the NSLP or SBP (inclusive of those currently offering meals through the SFSP or SSO under temporary federal waiver authority). This list will include children enrolled in Transitional Kindergarten through children aged 22 years.

To identify students who are eligible for FRPM, CDE will use data provided by LEAs via the Child Nutrition Information and Payment System to identify schools participating in the NSLP and SBP, and the California Longitudinal Pupil Achievement Data System (CALPADS), to identify individual student eligibility. The CDE will identify students

attending private schools who are eligible for P-EBT benefits by collecting data directly from private schools in a separate collection developed specifically for this program.

The master list will include SNAP-recipient and non-SNAP recipient students.

The master list will include children who have been:

- a. directly certified or determined “other source categorically eligible” (students who are homeless, migrant, or foster) for SY 2020-2021, **or**
- b. determined eligible for FRPM for SY 2020-2021, **or**
- c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3 for SY 2020-2021, **or**
- d. determined eligible for FRPM for SY 2019-2020 **and** the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.

Because most California LEAs and private schools are offering meals through the SFSP and SSO for SY 2020-21, rather than providing meals through NSLP or SBP, California proposes to use both the NSLP household meal application and California’s Alternative Household Income Form to establish FRPM eligibility for SY 2020-21. This approach provides the best available information indicating a student’s eligibility for FRPM for SY 2020-21 and will ensure that FRPM eligibility information for SY 2020-21 is available even for LEAs and private schools providing meals through the SFSP and SSO.

Due to concerns that LEAs and private schools may not be able to collect NSLP household meal applications or Alternative Household Income Forms as normal due to COVID-19-related circumstances, FRPM data for SY 2019-20 will be used for students who, in SY 2020-21, are enrolled in a participating school, are not eligible through direct certification or determined other source categorically eligible, and do not have an approved NSLP household meal application or Alternative Household Income Form for the current SY.

As previously mentioned, the master list will be based on existing FRPM eligibility information held in CALPADS and new FRPM eligibility information gathered from private schools.

The CDE will pull data from CALPADS to identify all public-school students that are FRPM eligible and enrolled at a public school approved to operate the NSLP or SBP, including all students enrolled at a public school approved to operate the NSLP or SBP under a provision. The list will include students newly enrolled in or transferring into a participating public school, as well as students transferring into a participating non-provision public school from a provision school. The list will not include students who have exited a public school or who have transferred into a non-participating public school during the school year for the months after the exit or transfer. The master list will include students who become newly eligible for FRPM

during the school year, based on direct certification or other categorical source, or an approved NSLP household meal application or Alternative Household Income form.

To complete the master list, the CDE will solicit student level FRPM eligibility data directly from private schools approved to operate the NSLP or SBP through a separate data collection effort implemented by CDE. Private schools approved to operate NSLP or SBP will be required to submit specified information on enrolled students who are eligible for FRPM.

While P-EBT eligibility for school aged children will be determined each month, benefits will only be issued twice during the period covered by this plan. This is discussed in more detail in the *Benefit Levels* section of this plan.

C. School Status

California will collect data related to the majority mode of instruction offered by all districts/public schools that operate NSLP or SBP, as well as charter and private schools during SY 2020-2021. Data will be collected directly from districts, charter schools and private schools and will include the majority mode of instruction for each month of SY 2020-2021. When submitting data, schools will select from three modes of instruction: (1) all virtual instruction, (2) hybrid instruction, and (3) all in person instruction. Majority means the mode of instruction employed by 50% or more of students enrolled at the school in each month. Reported school status will be used to determine monthly P-EBT benefit levels for FRPM eligible children enrolled at the school.

Public school districts and charters will provide school status data for each month of SY 2020-21 through an online data collection tool. Private schools will provide school status data for each month of SY 2020-21 at the same time they provide student level FRPM eligibility data (as described above) through a separate data collection effort implemented by CDE.

To encourage response, the P-EBT data collection effort will be integrated with existing data collection efforts related to California's statewide school reopening plan. The P-EBT data collection effort will use the same data collection tool and existing users of that tool will be able to submit additional data for the purpose of P-EBT. This approach will limit the need for additional training and will ensure appropriate district and school representatives are made aware of the effort as they use the tool to submit data for other purposes.

After the initial data collection period closes, the CDSS and CDE will review the data and identify non-responding districts and charter schools. Non respondents will be contacted by the CDSS or CDE to solicit a response. Additionally, the CDSS and CDE may populate missing data for individual districts and schools to the extent the information is publicly available. If the CDSS and CDE are unsuccessful in soliciting a

response and the necessary information is not publicly available, school status will be determined via proxy.

Non-responding districts and charter schools that require a proxy determination will be assigned a monthly school status based on the most common school status reported by elementary/middle and high schools in the same county. School status reported by responding districts and charter schools will be weighted based on enrollment. When assigning a school status to a non-responding school the most common instruction model employed by elementary/middle and high schools in the county will be applied accordingly based on whether the non-responding school is an elementary/middle or high school.

5. Benefit Levels

As provided by the Consolidated Appropriations Act, 2021, state agencies may develop and use simplifying assumptions to establish a state or regionally based benefit level for SY 2020-21.

California will use a two-tiered benefit structure: one benefit amount for school aged children attending a school assumed to be providing all virtual instruction and one benefit amount for school aged children attending a school assumed to be providing hybrid instruction.

The monthly standard benefit amount for all virtual instruction will be based on the average number of school days each year (approximately 180 days) over the length of the school year (approximately 10 months), which accounts for weekends and regularly scheduled breaks, multiplied by the per day SY 2020-21 free reimbursement for USDA school meal programs (i.e., \$6.82 per day.) As such, California will use 18 days to establish the monthly standard benefit amount for all virtual instruction.

All Virtual Instruction: 18 days x \$6.82 per day = \$123 per month

Based on a representative sample of California School Districts implementing a hybrid model of instruction (i.e. combination of in-person and distance learning), the two most common hybrid models used across the state are (1) 2 days a week in person learning/3 days a week distance learning and (2) half time in person learning/half time distance learning. This representative sample was established in early April 2021. Based on these findings, California proposes a hybrid benefit that represents the average time spent learning at school in person (45%) and the average time distance learning (55%) under the most common hybrid models statewide. Applying those percentages to the proposed full distance learning benefit amount, the P-EBT benefit for children attending school via a hybrid of in-person and distance learning is \$68 per month.

Hybrid Instruction: \$123 per month x 55% = \$68 per month

Benefit Issuance Schedule

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										TBD			TBD

To account for the fluid nature of the pandemic, the State will issue benefits retroactively for previous months based on past school status. This will ensure that benefits are not issued based on assumed circumstances that may change in the future. As previously mentioned, P-EBT eligibility for school aged children will be determined each month, but benefits will only be issued twice during the period covered by this plan.

6. Implementation Timeline, EBT Processing and Benefit Issuance*Implementation Timeline*

The feasibility of this timeline depends on the date of plan approval. The State may need to change the issuance schedule depending on when the plan is approved. The tentative time line is as follows:

Post-Plan Approval

May 3 to May 24: School status data collection prep, communications and training

May 24 to June 4: Data collection period

June 7 to June 18: Outreach to non-responding schools

June 12 to July 2nd: Data clean up

July 5 to July 30: Client education campaign launch

July 5 to July 16: P-EBT eligible list finalized

July 19 to July 30: P-EBT data prepped for and transferred to EBT processor

August 1 to September 30: P-EBT card mailing

October 18: P-EBT data prepped for second issuance and files transferred to EBT processor

November 15 to 30: Second benefit issuance

EBT Processing & Benefit Issuance

California will issue P-EBT benefits on dedicated P-EBT cards for all P-EBT recipients. All children, including those previously issued a P-EBT card and those that are newly eligible, will receive benefits on a newly issued card. The newly issued P-EBT card will

be distinguishable as a “P-EBT 2.0” card. All P-EBT cards will be issued in the name of the eligible child and each child will receive their own P-EBT card.

P-EBT cards will be mailed to the mailing address maintained by schools within CALPADS. Undeliverable cards will be deactivated by the EBT vendor. Families may contact the P-EBT Helpline to request that a new card be mailed to the correct address. All requests for replacement cards will also be handled by the P-EBT Helpline. Expanded P-EBT Helpline capacity will ensure that address change and card replacement requests can be processed timely.

P-EBT benefits will be distinguished from regular SNAP benefits via the use of a dedicated P-EBT benefit type. Because P-EBT benefits will be issued via a dedicated card and benefit type, there will be no draw/spend relationship between P-EBT, SNAP benefits, and Disaster SNAP benefits.

P-EBT benefits will be subject to existing SNAP expungement rules, except for dormancy. P-EBT cards will not become dormant at 180 days. This exception is warranted since P-EBT families will not be issued a dormancy notice. Removing dormancy balances the need for client access and the administrative burden associated with requests for card reactivation processed by the P-EBT Helpline.

7. Customer Service

California will take a multi-faceted approach to ensuring robust and accurate communication to all eligible households by launching a public information campaign through the length of the State’s P-EBT operation to reach both the general public and P-EBT eligible families directly.

General communications strategies will include a dedicated P-EBT website and wide range of media, as well as resources for partners including schools and community-based organizations to engage in client education. Resources include flyers, fact sheets, communication templates, and informational videos. The P-EBT website and materials will be available in multiple languages (including English, Spanish, Vietnamese, Mandarin, Arabic, and Cantonese), reflecting the primary languages spoken at home by the California student population; and the corresponding media strategies will also be multilingual. The website will be Americans with Disabilities Act (ADA) compliant. Paid media will include radio (with live reads), digital (connected TV, YouTube, Streaming Audio) paid search, and paid social media (Facebook, Instagram). Partner materials will include flyers, template text/email language and sample social media posts and graphics in multiple languages. These outreach materials will be shared broadly with schools and community organizations.

California will issue a series of direct mail communications to P-EBT eligible families. Ahead of the first issuance, P-EBT eligible families will receive a mailer that will provide general information and direct them to the P-EBT website for more information. The

mailer will include an explanation of P-EBT, eligibility for the program, and updates on implementation and issuance timelines.

A mailer will also be sent with each P-EBT card and will include information about how benefit amounts were determined, future issuances, how to check balances, how to request a replacement card, how to use P-EBT benefits, where P-EBT can be used, who to contact for questions, and how to opt out. The mailer will also include details on where to go for step-by-step instructions on how to PIN your P-EBT card and what to do if they do not want to use the benefits. Families will also be advised that P-EBT benefits are non-transferable. The information notice will be available in English and Spanish and will be accompanied by language assistance information.

California will issue another mailer ahead of the second P-EBT issuance. This mailer will include an explanation of how benefit issuances will be staggered based on card number and will direct clients to the P-EBT website or P-EBT Helpline for more information.

The P-EBT Helpline will serve as first line customer support. To support P-EBT eligible families, California has significantly expanded its P-EBT Helpline capacity. Tier I P-EBT Helpline agents will assist callers with general information, PIN set-up, address changes, and card replacements.

More complicated calls that cannot be resolved by Tier I P-EBT Helpline agents will be addressed by Tier II P-EBT Helpline agents. Tier II P-EBT agents will have more in-depth knowledge of P-EBT eligibility. Both Tier I and Tier II P-EBT Helpline agents will be able to access language line support as needed to provide service in languages other than English.

Neither Tier I nor Tier II P-EBT Helpline agents will be able to determine P-EBT eligibility. In instances where the P-EBT Helpline is unable to locate a child in the State's P-EBT records as an eligible child, the Helpline Agent will escalate the eligibility determination to CDE where issues of eligibility for school aged children can be resolved.

The CDSS and CDE are committed to equitable access for all eligible families regardless of their circumstances. To serve households with limited English proficiency, California's P-EBT plan includes access to information in languages other than English. To serve children without a social security number (SSN), P-EBT PIN set-up does not require an SSN. To serve households without internet access, California has included in this plan direct mail to P-EBT eligible families and has increased the P-EBT Helpline's capacity to provide general program info. To serve people with disabilities, P-EBT information will be provided in simple, direct and user-friendly language and the P-EBT website will be ADA compliant.

While P-EBT cards must be received by mail, California will offer options to assist families that may lack a permanent residence address. More specifically, P-EBT eligible

families may request that their P-EBT card be sent to a residence or commercial address, P.O. Box address, or general delivery. County human service agencies may also receive P-EBT cards on behalf of P-EBT eligible families experiencing homelessness.

8. Overissuance of P-EBT Benefits

Due to the scale of California's P-EBT operation, California's plan proposes reducing the number of issuances and issuing a standard benefit allotment based on simplifying assumptions. These measures will inherently eliminate the most common sources of issuance errors. Additionally, all P-EBT eligible children will be assigned a unique identifier. This unique identifier will be used throughout the data match process to ensure individual children are only issued P-EBT benefits once for each month the child is determined P-EBT eligible. The unique identifier will be used by the CDE, CDSS, and California's EBT vendor to review P-EBT data for potential duplicates at various points in the data match and benefit issuance process.

Because P-EBT eligible families will receive P-EBT benefits without application and eligibility will be determined based on the State's own administrative data, individual children and families will not be held liable for any administrative overissuance of P-EBT benefits.

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.

10. Administrative Funding

A separate grant to cover state and local level administrative costs associated with the administration of P-EBT will be awarded to CDSS as the SNAP State Agency within California. As the authorized grantee, the CDSS 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, CDSS will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with the CDE.

Prior to USDA releasing the grant for administrative funding, CDSS will submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement.

As noted in Item 9 above, CDSS will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT.

The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement.

The forms associated with P-EBT will be modified accordingly.

11. Release of Information

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

12. Civil Rights Statement

The State will continue to comply with civil rights requirements, including the provision of equal access to individuals with disabilities and individuals who are limited English proficient, as described above.

13. 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:



Alexis Fernández
Chief, CalFresh and Nutrition Branch
California Department of Social Services

Kim Frinzell
Director, Nutrition Services Division
California Department of Education

Date of Request: June 2, 2021