

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
Document ID:	
Z-RIN:	
Date of Issuance:	January 29, 2021
Replaces:	N/A
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:** Connecticut

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.

Connecticut proposes that the date range for the current plan will be from September 1, 2020 through September 30, 2021.³ The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The upper-bound estimates of P-EBT issuance during the date range coverage period are based upon November 2020 data and are as follows:⁴

- Monthly issuances of \$21,998,387.40⁵ (total expected number of eligible students based upon November 2020 data)
 - Estimated monthly amount issued to school children in SNAP households is \$8,603,927.86
 - Estimated monthly amount issued to school children in non-SNAP households is \$13,394,459.54
- Total issuance of \$219,983,874.00 (monthly estimate multiplied by the ten months – September 2020 through June 2021 – of the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$86,039,278.60
 - Estimated total amount issued to school children in non-SNAP households is \$133,944,595.40

The estimated total *number* of children to which the State will issue P-EBT benefits is approximately 243,700

- Estimated number of school children in SNAP households is 93,210
- Estimated number of school children in non-SNAP households is 150,490

The state intends to issue P-EBT benefits retroactively in two phases for all eligible recipients (SNAP and non-SNAP households). The first issuance is planned to occur beginning March 27 and will cover September 1 – January 31 and the second issuance is planned to occur beginning June 23 to cover February 1 – the end of the school year.

³ Estimates provided in this plan amendment are not applicable to August or September 2021 as these months are part of a separate school year and data to inform estimates for those months is not yet available. The state will notify FNS should we proceed with P-EBT for SY21-22 and provide the associated estimates

⁴ Estimates are subject to change as student/school learning modes fluctuate

⁵ The state anticipates these numbers to fluctuate based on the changing of operating status, however this was calculated based upon best available data.

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: [please use as much space as needed]

To identify eligible school children and confirm their eligibility, the Connecticut State Department of Education (CSDE) will utilize four student data collection

systems that collect student enrollment, attendance, meal eligibility, and address information from districts:

1. **Public School Information System (PSIS) Registration:** This is the 24/7 student enrollment management system. It represents the most current, statewide record of student enrollment across Connecticut. Districts update this on a daily/weekly basis.
2. **PSIS Monthly Membership and Attendance Collection:** To track student attendance throughout the year and promote student engagement, the CSDE established a new collection to collect student-level attendance each month. Through this collection, districts report the days of membership and days of attendance for all students in Grades K-12. Most importantly for purposes of P-EBT eligibility and benefit-level determination, the days of membership are reported separately at the student-level for in-person school days and remote school days. Students who are remote do not have access to meals served at school. These data are collected at the end of every month for the prior month.
3. **PSIS October Collection:** This snapshot collects student enrollment as of October 1. It also collects meal eligibility status information (i.e., free, reduced, or not eligible) for all students from all districts.
4. **PSIS Address and Meal Eligibility Collection:** This collection was originally established in May 2020 for the first round of P-EBT. It collects mailing addresses for students who are not directly certified by DSS for school meal benefits as well as the most current meal eligibility status for students. This collection will be conducted twice in the 2020-21 school year. It will enable the CSDE to capture students who transferred newly into the state or enrolled newly in public school.

In addition to these four collections, the CSDE also receives direct certification data from DSS on a weekly basis. Currently, those direct certification data are matched with PSIS Registration to provide benefit categories and corresponding student meal eligibility information to authorized food service staff across Connecticut.

The Child Nutrition Programs Online Application and Claiming System will be used to verify schools' participation in the NSLP and SBP.

Eligibility Determination:

To identify eligible school children and confirm their eligibility for P-EBT, Connecticut will utilize the following approach:

1. **SNAP-recipients:**
 - a. The CSDE will match its school enrollment database (PSIS Registration) with the direct certification data for the school year to identify all students who are eligible for SNAP in the school year.
 - b. The CSDE will leverage simplifying assumptions to determine the

eligibility of students for P-EBT benefits. The SNAP-eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-EBT in a given month will receive one of three benefits described below under Section 6, Benefit Levels.

2. Non-SNAP Directly Certified Recipients:

- a. The CSDE will match its school enrollment database (PSIS Registration) with the direct certification data for the school year to identify all students who are ineligible for SNAP but are directly certified for other benefit types (e.g., TANF, Medicaid) in the school year.
- b. The CSDE will leverage simplifying assumptions to determine the eligibility of students for P-EBT benefits. The non-SNAP-eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-EBT in a given month will receive one of three benefits described below under Section C, Benefit Levels.

3. Non-SNAP and Non-Directly Certified Recipients:

- a. The CSDE will utilize the October collection and the PSIS Address and Meal Eligibility Collection to identify those students in 2020-21 who are not directly certified through DSS but are eligible for free or reduced-price meals through:
 - i. the submission of a household application that is processed by the school;
 - ii. enrollment in a Community Eligibility Provision school; or
 - iii. other categorical eligibility means (e.g., homeless, foster care).
- b. The CSDE will leverage simplifying assumptions to determine the eligibility of students for P-EBT benefits. The non-SNAP and non-directly certified eligible students identified in the first step will be matched with the PSIS Monthly Membership and Attendance Collection. Students who meet the eligibility criteria to receive P-EBT in a given month will receive one of three benefits described below under Section C, Benefit Levels.

The CSDE will collect the same data from private schools participating in NSLP through direct communication with the private schools.

The State plans to issue P-EBT retroactively in month increments using the most recent data available in PSIS for determining eligibility for free or reduced-priced meals and student degrees of remoteness. The first issuance will include all months of the 2020-2021 school year that have passed prior to the month of issuance for which CSDE has already collected attendance data.

The state also intends to utilize simplifying assumptions that if students become eligible for P-EBT benefits during the year, either by becoming directly certified,

filling out an application for free or reduced priced meals, or other means, the state may generally assume that these students were eligible back to the start of the school year and will issue benefits accordingly. Once a newly eligible child is identified, their learning model will be utilized back to the beginning of the school year to ensure they receive the proper benefit amounts.

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

- The Connecticut Department of Social Services (CTDSS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients, and coordination of customer service and support.
- The Connecticut State Department of Education (CSDE), in collaboration with the local school districts, is responsible for identifying eligible children through the direct certification process, the free and reduced-price school meals income eligibility application process, and the monitoring and collecting of student learning mode classifications.

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: [please use as much space as needed]

The CSDE intends to use its PSIS Monthly Membership and Attendance Collection data to confirm the five consecutive day requirement has been met. The CSDE data collections will be used by the CSDE to apply a simplifying assumption that, if a student is engaged in a remote learning model, the school that student is enrolled in is operating a hybrid learning model with reduced in-person attendance.

The State will then use the PSIS Monthly Membership and Attendance Collection at the student level to determine the extent to which category eligible students are grouped into for the purposes of issuing P-EBT benefits.

Private schools participating in NSLP will be required to submit the same data sets described above to the CSDE on a monthly basis.

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: [please use as much space as needed]

Connecticut is currently developing a plan for children in child care and has elected to not submit that plan at this time. We will do so as an amendment under separate cover.

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: [please use as much space as needed]

In order to: (a) align benefit amounts with the way student data is reported by school districts; (b) structure the program in a way that is more efficient for the school districts, advocates, and state agencies to administer; and (c) facilitate simplified messaging to clients and stakeholders, Connecticut proposes to use the simplifying assumptions option by issuing P-EBT benefits in three distinct amounts.

1. One amount for students enrolled in a “**fully remote**” learning mode (inclusive of students whose school district is operating an in-person or hybrid model, but the family opts into fully remote learning);
2. One amount for students enrolled in a “**mostly remote**” learning mode (inclusive of students who are absent from an in-person learning model due to COVID and the need to quarantine); and
3. One amount for students enrolled in a “**hybrid**” learning mode (inclusive of students who are absent from an in-person learning model due to COVID and the need to quarantine).

Fully remote – Defined as having attended school remotely for all days in the month. In a normal school year, Connecticut schools are required to offer 180 school days generally offered over a nine-month period. On average most students are in school for 18 days per month; therefore, Connecticut proposes to use a 18-day standard to inform the fully remote amount. This allows the state to issue one consistent benefit of \$122.76 per month based on the Free Reimbursements USDA School Meal Programs daily rate, thereby mitigating household confusion and reducing the administrative cost

of handling inquiries to DSS' Benefit Center assistance line and other contact points.

Mostly Remote – Defined as having attended school remotely for more than 50% of the benefit month, but less than fully remote. CT has reviewed October 2020 school attendance data to best determine the average number of days children in this category are learning remotely. Based upon this data, the “mostly remote” benefit amount will be calculated by issuing P-EBT benefits for 13 days equaling \$88.66 per month.

Hybrid – Defined as having attended school remotely for equal to or less than 50% of the benefit month, not inclusive of those individuals who attended school fully in-person for the entire month. CT has reviewed October 2020 school attendance data to best determine the average number of days children in this category are learning remotely. Based upon this data, the “hybrid” benefit amount will be calculated by issuing P-EBT benefits for 5 days equaling \$34.10 per month.

To account for the fluid nature of the pandemic and that a student's status may change mid-month, the state proposes to issue benefits retroactively. The first issuance will occur in March 2021 and will include all months of the 2020 – 2021 school year prior to the date of issuance for which CSDE has already collected attendance data. DSS will collect the learning mode from CSDE that each eligible student is enrolled in for each benefit month between October – January. For students who become eligible for P-EBT mid-month, the learning mode they were enrolled in for the majority of that month will inform their benefit amount.

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: [please use as much space as needed]

Connecticut currently plans to retroactively issue September 2020 – January 2021 P-EBT benefits beginning March 27, 2021. For the second period of February – end of school year, Connecticut intends to issue P-EBT benefits retroactively beginning on June 23, 2021.

The feasibility of these dates will depend on the date of plan approval as well as ability to print and deliver P-EBT cards to eligible non-SNAP households, as well as the ability of the state's EBT vendor, to receive and process the P-EBT files. The state may need to change the issuance schedule depending on when the plan is approved as well as other currently unanticipated technical challenges. The tentative approach is as follows:

Day 1 – Lists of eligible students receiving SNAP/TANF/MA received from CSDE

Days 2 – 11 – P-EBT system development, testing, validation, and sign-off

Day 15 – List of eligible students not receiving assistance from DSS received from CSDE

Day 29 – Card file for eligible students receiving MA sent to card vendor for printing

Day 36 – Benefits begin being distributed for eligible students receiving SNAP/TANF/MA

Day 37 – Card file for eligible students not receiving assistance from DSS sent to card vendor for printing

Day 42 – Benefits begin being distributed for eligible students not receiving assistance from DSS

Note: schedule is subject to change based upon approval date, system development, testing

and sign-off.

Connecticut has identified end of month issuance dates to: allow time for the necessary data clean up and reconciliation process to occur, transfer of data to EBT vendor, balance resources as Connecticut may simultaneously be issuing SNAP Emergency Allotment benefits, and ensure P-EBT issuances do not interfere with the state's normal monthly issuances of regular SNAP benefits on the first three days of each month.

The state will continue its use of the SNAP subaccount codes of 9002 for SNAP households and 9003 for non-SNAP households which were specifically created for the separate tracking and payment of P-EBT benefits and differ from our SNAP and D-SNAP subaccount coding.

As with our previous submission, P-EBT will be given the highest spend priority amongst all benefit types to ensure it is used during the period for which it was intended. In addition, P-EBT benefits will follow the same expungement rules that the state follows for SNAP.

The state intends to follow the same distribution model used in previous iterations of P-EBT. DSS SNAP and TFA households will receive their P-EBT benefits on their pre-existing ConneCT EBT cards, DSS Medicaid households will receive P-EBT benefits on a card issued to the child's head of household in the DSS ImpaCT eligibility system, and non-DSS households will receive benefits on a P-EBT card in the eligible child's name.

In order to minimize administrative burden during the pandemic, new P-EBT cards will be issued to all non-SNAP and TFA families regardless of whether they were previously issued a P-EBT card for the 2019 – 2020 school year. To reduce costs and timeline for implementation, Connecticut will use the normal DSS SNAP EBT card design and will not be issuing a unique card for P-EBT benefits.

For families whose card has been lost, damaged, or was not received, DSS will replicate the prior process for handling requests via its Benefit Center assistance line. DSS households whose card was not received or was lost or damaged will be have a replacement card issued via standard replacement card processes in the ImpaCT eligibility system. These new cards are issued daily. Replacement card requests for non-DSS households will be sent to the DSS SNAP Unit for review. Once a correct address is obtained, the SNAP Unit adds the household to its card replacement master list. This list is sent weekly on Fridays to the EBT vendor, at which time a new card is generated. Undeliverable cards will be returned to the DSS Central Office who will in turn provide CSDE with this information. Undeliverable card information will then be shared with school districts for outreach purposes (see proposal below in the "Customer Service" section).

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: [please use as much space as needed]

DSS has a multi-faceted approach to ensuring robust and accurate communication to all eligible households regardless of primary language, lack of permanent address, or access to technology. DSS's Benefits Center will continue to serve as front line customer support. Eligibility workers assigned to the Benefit Center are already familiar with the P-EBT program from the previous school year and have direct access to the ImpaCT eligibility system to review all DSS household P-EBT cases. DSS staff can also check deposit date and issue card replacements. In addition, these workers have access to the EBT system to review transactional data, have access to language interpreters, and there are TDD/TTY options for callers who are deaf.

For non-DSS households, or any other issues that cannot easily be resolved, procedures are in place for Benefit Center staff to pass the relevant information via direct email to the DSS SNAP Policy Unit for review and response. A dedicated team monitors this inbox and resolves issues using the records provided by the school districts. In instances where DSS is unable to locate a child in their records, DSS will contact CSDE for assistance before the family will be referred to their respective school districts where issues of eligibility can be more easily determined.

DSS and CSDE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with the statewide McKinney-Vento coordinator to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. Collection of social security numbers (SSN) are not necessary to apply for NSLP, therefore children without SSNs may pursue eligibility for P-EBT through free and reduced-price school meals income eligibility applications. DSS and CSDE also have Department of Children and Families liaisons to coordinate issues regarding foster care children.

The state is also committed to serving all eligible children regardless of primary language. In the spring the state stood up a section of their state website, <https://portal.ct.gov/p-ebt> dedicated to P-EBT. This website can be easily translated into eight different languages. Furthermore, all outreach materials are being provided in both English and Spanish.

Public Awareness Campaign: As noted above, the state will conduct a public information campaign using the state website <https://portal.ct.gov/p-ebt> and social media platforms including Twitter and Facebook. Connecticut also intends to issue a press release to target state-wide and local news organizations and the Governor's office will announce through its daily briefings. The state will work with CSDE to inform schools and community organizations as well as the advocate community through emails and flyers as well as an established bi-weekly state food insecurity meeting.

Direct Communication: As part of the first benefit issuance, all eligible P-EBT households will receive a brochure similar to what was sent in the spring. This brochure will include an explanation of P-EBT generally, eligibility for the program, benefit amounts, issuance dates, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions, and what to do if the household chooses not to participate. The brochure will also include information on how to PIN their card and will direct them to the DSS website for more information including Q&As. The notice is available in English and Spanish.

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: [please use as much space as needed]

Connecticut has many lessons learned from administering P-EBT during the 2019 – 2020 school year and believes using the most up-to-date information available is essential to avoiding incorrect issuances. DSS and CSDE have committed extensive time and resources to updating and correcting inaccurate household addresses. For SNAP households, the data in the ImpaCT eligibility system will be used to distribute cards, while non-SNAP households will receive cards at the address provided to CSDE by the child’s school district. The state remains committed to using all available resources including the state’s McKinney-Vento coordinator as well as DCF to ensure it has the correct address information. The state is also committed to using its resources to research and resolve issues related to custody concerns including the continued use of DSS’s Fraud Early Detection (FRED) unit to investigate claims of incorrect issuance.

In instances of custody disputes, DSS will encourage parents to work together, to the extent possible, to resolve the issue prior to the state taking any corrective actions.

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:

Signature

Daniel Giacomini, SNAP Program Administration Manager
Program Oversight & Grants Administration
Connecticut Department of Social Services



Signature

John D. Frassinelli, Division Director
School Health, Nutrition, Family Services and Adult Education
Connecticut State Department of Education

Date of Request: February 22, 2021