

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

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

The data below explains how DC's program will be shaped. The District commits to informing USDA of any significant increase or decrease in these data points during the **October 1, 2020 to June 24, 2021** period covered by this initial plan.

  - a. This state plan will cover the dates of **October 1, 2020** through **June 24, 2021** for children in school and for children in child care.
  - b. The estimated monthly benefit amount is **\$10,434,600** making the total amount **\$93,911,400** for P-EBT benefits the State will issue from October 1, 2020 to June 24, 2021.
    - The estimated amount issued to school children in SNAP households is **\$44,359,326**
    - The estimated amount issued to school children in non-SNAP households is **\$36,293,994**
    - The estimated amount issued to non-school children in child care is **\$13,258,080**
  - c. The estimated total number of children to which the State will issue P-EBT benefits is **85,000**
    - The estimated number of school children in SNAP households is **40,150**
    - The estimated number of school children in non-SNAP households is **32,850**
    - The estimated number of non-school children in child care is **12,000**
  - d. The estimated total amount of administrative funds the State needs to complete the work described in this State plan is **\$8,987,379.40**
  - e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
    - School children in SNAP households: 4/1/21–4/15/21; 5/1/21–5/15/21; 6/1/21–6/15/21
    - School children in non-SNAP households: 4/16/21–4/30/21; 5/16/21–5/31/21; 6/16/21–6/30/21
    - Children in child care: 4/1/21 – 4/15/21; 5/1/21 – 5/15/21; 6/1/21 – 6/15/21

SY20-21 P-EBT Estimated # of Eligible Children and Benefit Amount							
	Active SNAP			Non-SNAP	Estimated Total		Issue Date
	School	Child Care	Sub-total	School	Maximum	Minimum (60% for Apr-Jun)	
# of Eligible Children	40,150	12,000	52,150	32,850	85,000	85,000	
# of Households	23,618	7,059	30,677	27,375	58,052	58,052	
Total Benefits	\$44,359,326	\$13,258,080	\$57,617,406	\$36,293,994	\$93,911,400	\$81,389,880	\$6.82 per day per child
Month	Oct-20	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Nov-20	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Dec-20	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Jan-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Feb-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Mar-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Apr-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	May-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600
	Jun-21	\$4,928,814	\$1,473,120	\$6,401,934	\$4,032,666	\$10,434,600	\$10,434,600

## 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.

1. *Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.*
2. *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.*
3. *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.*
4. *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.).*
5. *Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).*

**Response:** [please use as much space as needed]

1. The District will identify P-EBT eligible school children through the Office of the State Superintendent of Schools' (OSSE) Student Information System (SIS). The SIS collects student-level data from each Local Education Agency (LEA), including the student's enrollment status for each school year, Free and Reduced Price School Meals (FARM) eligibility, enrolled school name, grade level, parent information, and home address. The District will allow parents to provide updates to a student's FARM application throughout the

school year. Students approved for FARM during the current school year will receive P-EBT benefits retroactively from their first enrollment at an eligible school. The District will require all non-Community Eligibility Provision (CEP) schools to update their students' FARM eligibility status in the SIS to ensure that any FARM applications submitted are processed into the SIS on time.

The District will exclusively use current school year eligibility (SY20-21) to determine student eligibility and not referencing prior school year (SY19-20) status. The SIS is updated at the beginning of the school year and throughout the year to ensure up-to-date information of students enrolled and attending DC LEAs and eligible for FARM is provided to DHS for processing P-EBT benefits. Therefore, the District will be able to issue benefits to all newly eligible students while removing those who graduated or moved into ineligible schools, from the eligibility list.

2. The District will determine and confirm each child's eligibility for free and reduced-price school meals as follows:
  - a. Children attending non-CEP schools must complete a FARM application and show as certified for FARM in the SIS for the SY20-21.
  - b. Children attending CEP schools as determined by their enrollment status for SY20-21 in the SIS.
  - c. Children are directly certified through their household's participation in the Supplemental Nutrition Assistance Program (SNAP) as determined based on data bumps of children eligible for P-EBT in the SIS against its SNAP eligibility system, DCAS.
  - d. Children attending non-public schools because of educational needs related to a disability will be considered for eligibility as members of their "home LEA," which is the in-bounds neighborhood public school they would have attended, "but for" their need to attend their assigned non-public school as determined by their status in the SIS.\*
  - e. Children that are newly-eligible, such as transfers, children in families with a loss of income, or children that aged into school this year, will be identified automatically as the SIS maintains their current information. The DHS will receive and update all students enrolled and determined to be eligible for P-EBT from OSSE.

\*The District understands that FNS has not yet decided whether states may issue benefits to students assigned to a non-public school based on their need. The District understands this plan may be approved without eligibility for these students.

3. The District will confirm each child's lack of access to meals based on the following simplifying assumptions:
  - a. **Statewide:** all eligible children had a lack of access to school meals since October 2020. District schools have been nearly-wholly closed with only a very small number of students allowed in school buildings since October pursuant to District public health guidance. For each month from October 1, 2020 through January 31, 2021, fewer than 1% of student-days were attended in person per month. It would be an inefficient use of resources and administratively prohibitive to reconstruct each individual school schedule since October for the handful of children that may have received in-person instruction and received a school meal, so the District is proposing

- a state-wide all virtual status for this period. Starting in February, the District will start tracking operating status at the school-level.
- b. **School-Level:** Eligible children had a lack of access to school meals based on the school's learning model (virtual vs hybrid). Starting on February 1, 2021, some students returned to school; from that point forward, school status will be tracked at the school level. The learning model will be determined "virtual" if school-level aggregate attendance data indicates less than 50% of student-days were attended in-person otherwise the learning model will be determined hybrid. The bar was set at 50% of student-days because if a school changes to 'hybrid' it will mean the majority of students are receiving in-person instruction.

The District has a very small team to administer P-EBT. With the complexities of rapidly changing school status this school year, compared with a constant virtual status during the SY 2019-2020 P-EBT program, the District simply does not have the capacity to conduct school-level tracking prior to February 1, 2021. To conduct the school-level tracking discussed above, the District is pursuing P-EBT administrative funds to seek contractual support. The above simplifying assumptions maximize the speed of disbursement of funds related to the early part of the school year when the District's operating status was uniform but allows for a more-targeted approach as resources become available to refine DC's data management strategy.

The above will be used for SNAP and non-SNAP-recipient children, and children in non-public\* schools.

The District assumes students enrolled in a non-public school lack access to meals at school during the pandemic. The P-EBT eligibility of a child placed in a non-public school will be determined based on their 'home LEA' and calculated in the same fashion as all other students in that LEA. Students would not be attending non-public schools if their neighborhood public school could provide accommodations required by the child's special needs. The District funds the child's placement in the non-public school for this reason. These children have been experiencing food insecurity since they were not included in the P-EBT program's first iteration and parents have informed the District of this need. Further excluding these District residents would be inequitable as they are among the most in need of support, evidenced by the very fact that they required placement in a non-public school.

\*The District understands that FNS has not yet decided whether states may issue benefits to students assigned to a non-public school based on their need. The District understands this plan may be approved without eligibility for these students.

4. The District will update and re-establish eligible children's in-person or virtual status based on the school's status as described in 4.B.3. above no less frequently than every other month.
5. The roles and responsibilities for each District agency involved in the process are as follows: The P-EBT Program will be led jointly between OSSE and DHS. OSSE is the State agency responsible for the NSLP, collecting and maintaining student data; tracking and managing school schedules; determining eligibility at the school and individual student level; and reporting enrollment and NSLP data to FNS. DHS is the State agency responsible for SNAP,

issuing benefits; handling and tracking payment corrections; managing expungements; managing EBT processes and procedures; reporting issuances to FNS; and managing a call center for direct support to residents. Both agencies will work together to carry out the P-EBT program requirements. In addition, the DC Child and Family Services Agency (CFSA) and DC Public Schools (DCPS) will provide support. CFSA will provide data for school children placed in foster care so the District can determine the correct household to receive EBT cards. DCPS is conducting efforts to encourage better data collection by participating in the joint communications campaign.

OSSE maintains enrollment data for all District children receiving free or reduced-price meals at schools across the District. This includes public, charter, and private school children. In addition, all children attending schools that participate in CEP are included. OSSE will provide DHS the universe of children receiving free or reduced-price meals in the District, with their parent/guardian information and addresses.

## 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.

1. *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.*
2. *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?*
3. *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.).*
4. *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.*
5. *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]

1. The District will identify, confirm, and monitor schools' status as described in section 4.A.3-4. Aggregate student-level data will be used to calculate the ratio of in-person student-days to drive a statewide status. On February 1, 2021 the District will begin to establish operating status at the school level. This is because less than 10% of student-days across the District are currently attended in person. Given that each school's student-level data is used to drive the aggregate calculation, the school level is the smallest possible unit at which aggregate data should be reviewed to avoid data issues for individual students, including around typical student-level variability.
2. All DC schools were closed for the minimum-required five consecutive days in SY 20-21 at the start of the year.
3. The District will use a simplifying assumption to assess operating status with a state-wide

status as described in section 4.A.3-4. This information will be updated no less frequently than every other month.

4. The District will monitor changes in eligible school status by recalculating the ratio of in-person student-days on the last day of each month. Student-level attendance data is reported by schools daily, directly into the Student Information System, starting from October 1, 2020. The data is aggregated into student-days monthly. Since benefits will be issued retroactively until June, the District will be able to calculate the status based on actual aggregate schedules after the month has closed. The only month for which this will be impossible is June, so to ensure that the June payment is not delayed, the District will use a simplifying assumption that June schedules are exactly the same as May schedules. This is reasonable because the District maintains consistent student schedules for each term and May/June are part of the same term.
5. Simplifying assumptions have been described in the previous sections.

#### 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.

1. *Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.*
2. *How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?*
3. *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?*
4. *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:*
  - a. *the child's child care facility is closed or is operating with reduced attendance or hours, or*
  - b. *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?*
5. *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 PEBT in those areas?*
6. *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.)*

7. *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).*
8. *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]

1. The District will define those children deemed to be enrolled in a covered child care facility under the FFCRA by identifying all children under the age of six on October 1, 2020, as SNAP household members from the District's eligibility system DCAS. This list of SNAP children under age six will be compared to the list of school children eligible for P-EBT to ensure that they are paid only once for the respective benefit month.
2. The District will determine and confirm the child's receipt of SNAP benefits through data matching completed by DHS against benefit issuance through the child's SNAP household existing SNAP EBT accounts to be compliant with relevant SNAP privacy requirements.
3. For all children in child care, the District will issue full benefits until the District-wide aggregate count of in-person student-days hits 50%, at which point all children in day care will receive the hybrid benefit. This will apply to all children who are under six on Oct 1, 2020, are not enrolled in a school, and are part of a SNAP family. For children under six on Oct 1, who *are* enrolled in a school, those students will be considered under the P-EBT rules for students. In the District, Pre-K starts at age 3, so a comparatively small number of children will be considered under daycare-only rules.
4. In the District, Mayor's Order 2020-075 provided that childcare operations could resume operations with the same staff/child ratios as applicable before the COVID-19 pandemic, with enhanced social distancing and hygiene practices as may be prescribed by OSSE or the DC Department of Health. OSSE guidance issued on Dec 21, 2020, mandates reduced capacity under this order. The enhanced social distancing provision necessitates that all child care centers in the District will be operating at a reduced capacity until social distancing is no longer required. Our simplifying assumption related to this provision will be that all childcare centers are operating at a reduced capacity on a state-wide level.
5. The District's current public health ordinances assume that child care facilities' capacity in response to COVID-19 is limited state-wide. As the District manages a state-wide eligibility system, the District can define all SNAP-participant children under age six as deemed eligible for P-EBT, without any additional step to determine the affected geographic area.
6. The District will identify all SNAP-eligible children under the age of six as of October 1, 2020 and compare it with the list of school students eligible for P-EBT to eliminate any children identified as school children. The District will update the list every other benefit month to add all newly eligible SNAP children through new applications or new-born babies within the existing SNAP households. The District plans to issue P-EBT benefits retroactively to all of the newly eligible SNAP children unless the USDA provides further guidance to limit the retroactive payments for this population before the District is ready to process benefit issuance.
7. OSSE is responsible for providing DHS with information on the operating status of DCPS schools and child care facilities in the District. DHS is responsible for identifying SNAP

children under six on or after October 1, 2020, comparing both lists to avoid any duplicate benefit issuance and processing benefits

8. The District will assume that if a child was under the age of six on October 1, 2020, the child is deemed enrolled in a covered child care facility and thus eligible for P-EBT benefits throughout the entire school year regardless of whether the child continues to receive SNAP benefits after October 2020. This approach is consistent with the OSSE's current FARM eligibility protocol, which allows a child eligible for FARM to remain in the program throughout the school year unless the child moves out of state. Additionally, child care centers will be assumed to have 18 operating days per month, similar to schools, and a child eligible under this provision will have the same benefit amount for the eligible period. For children whose SNAP enrollment began after October 1, 2020 the District plans to elect the following administrative simplification: for the District's first P-EBT issuance, the District will issue benefits retroactive to October , 2020 for all children under 6 who are SNAP-enrolled at the time of issuance. For future monthly issuances, the District will issue benefits back to the date of the previous issuance (but not further) to the children under 6 who are SNAP-enrolled at the date of the current issuance.

## 5. Benefit Levels

### *Standard for Benefit Levels*

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

SY 2020-2021 July 1, 2020 - June 30, 2021				
	Lunch	Breakfast	Snack	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.*

*Source:* [\*https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf\*](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]

- School status will be determined as described in sections 4.A.3-4.
- If a school is in virtual status, eligible students will receive 100% of the daily benefit, **\$6.82**.
- The District will use a simplifying assumption that each month contains 18 days of instruction, which is the average number of school days per month this SY. It is ideal to keep the monthly rate flat to reduce confusion around a short-term program that already receives a high call volume. Each eligible child will be paid the flat monthly rate of 18 days of instruction x \$6.82 per day = **\$122.76 per month** of eligibility at a fully virtual school.
- If a school is in hybrid status, the District will assume a flat rate of 60% virtual school days per month, based on a review of current schedules and the most commonly used schedule at this time. This sets the flat hybrid rate at **\$73.66 per month** of eligibility at a hybrid school. This flat rate calculation is necessary because District schools have not, as yet, widely re-opened. The District, FNS, and students need to have an expectation set for the first issuance of hybrid benefits, once the District meets the threshold for hybrid status.
- The District will re-assess its average benefit using a methodology based on the collection of averaged updated school schedules no less frequently than every two months.

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

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

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

- *Public notice campaign begins (Day #10), etc.*

*Please also address each of the following:*

1. *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?*
2. *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.*
3. *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.*
4. *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.*
5. *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?*
6. *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]

A milestone-based timeline for the upcoming plan is as follows:

- Day 0 - Plan approval received & initial funding unlocked
- Day 0 – Submit limited spending plan to request procurement funds
- Business Day 1 – Launch emergency procurement for Call Center staffing augmentation and other specialized staffing augmentation on a limited basis using the initial funds
- Business day 25 - On-board staff augmentation contracts for call center and data analysis
- Business Day 30 - Send file for SNAP and non-SNAP families payments to EBT vendor (FIS)
- Business Day 40 – Call center becomes active
- Business Day 41 – 1<sup>st</sup> benefits available on existing EBT cards

This plan has been discussed with the District's EBT vendor, FIS.

1. The District will distinguish P-EBT from SNAP and D-SNAP by creating a new benefit type. The District will not issue unique designs for the P-EBT cards. Our EBT vendor, FIS, will also be issuing cards with the same design as our SNAP card. The cardstock has been assessed against the projected P-EBT load and has been determined to be more than adequate.

2. P-EBT will be the first Food spend priority on the new benefit type.
3. The District plans to expunge P-EBT benefits after 365-days of account inactivity in accordance with 7 CFR §274.2(h), keeping P-EBT consistent with our current plan for SNAP.
4. EBT cards that are returned in the mail will be handled as follows:
  - The EBT processor prints their own address as the return address on the secure envelope containing a new EBT card.
  - If a card is returned to FIS as undeliverable, FIS will destroy the returned EBT card and update our EBT Edge tracking system with the fact that the card was destroyed
  - DHS can run a regular report to review returned cards and update the P-EBT database with cards that have been returned so the Call Center will have this information available and agents will know to request an address update from a caller
5. DC will not issue new P-EBT cards to existing P-EBT or SNAP households unless a replacement card is individually requested by a parent contacting the District's EBT vendor or the household has not been eligible before this issuance. Replacement EBT cards will follow the District's existing replacement card process:
  - Customer calls the EBT Call Center requesting a replacement
  - The EBT processor cancels the card and prints and mails a new card  
In the event that a customer contacts the District, directly, to request a replacement card:
  - District employee will determine, with the customer, whether the card should be re-mailed or printed in person at an EBT storefront
  - The customer will then either receive a mailed replacement card via a DHS-initiated EBT processing request or be able to visit the storefront and pick up a card in person

## 7. Customer Service

### *Recommended Standard for Household Support*

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

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

1. *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.*

2. 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.
3. 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).
4. 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]

1. The District plans to issue a contract to manage a call center. The call center contract will be modeled after an existing District contract for consolidated call center services which has worked well for past DHS needs. The center will be able to stand alone and the team (vendor) will be required to come fully-equipped, trained/experienced in customer service, and with all wrap-around and internal management services included. The District will train them only on P-EBT policy, the P-EBT case management computer system, and P-EBT processes. This structure addresses both the temporary nature of the program and the need to ramp up quickly.

The call center will be charged with the responsibility of handling and recording, on a first-tier level, incoming customer questions; disputes; and recording reports of incorrect issuances. They will be able to research basic customer information and immediately answer basic customer questions, but they will not be able to take any action on a case. The call center will also be responsible for placing outgoing calls to notify customers of corrective actions taken on their case after a call has ended. All calls will be noted in the P-EBT database and any necessary actions will be escalated to the tier 2 case analysis team. The tier 2 analysis team will have access to more types of data from OSSE and DHS and will not be speaking to customers, so they will be expected to focus solely on case resolutions. The tier 2 team will be expected to take actions necessary to correct a case, from an address, payment, or household correction to the reissuance of a lost or misdelivered card. The tier 2 team will have an additional escalation pathway within it so that a sub-team will be set aside to handle the most difficult or confusing cases based on the data coming from all District systems. Once the issue is resolved, the action will be communicated back to the call center and a callback team will reach out to the customer to let them know of the correction made. There is not a current live phone number for the call center; once the contractor stands up the new center and the phone number is finalized and publicized, it will be provided to FNS.

2. The District will leverage existing communication channels and conduct outreach to ensure messaging for P-EBT is effective for all families, including Mayoral briefings; robo calls; social media; and website updates. Since the data from OSSE contains all school children receiving free or reduced- priced meals, all populations will be included in the P-EBT program.

The District is taking extra steps to ensure that while all families are included in the benefit issuance for the program, they are also accounted-for in our support for the issuance.

- To address the population who may be experiencing homelessness during this program, DHS has partnered with 13 shelters across the District for customers without a fixed mailing address to use the shelter's address to receive mail – including their EBT card. In addition, customers without a fixed mailing address can pick-up their EBT card at the H Street EBT Card Distribution Center. Many of these customers may already have received cards during the first issuance of P-EBT, so the District expects that issues around receiving cards may be mitigated for this issuance.
- To address students and families with limited English proficiency, all printed materials will also contain translations into at least Spanish and Amharic. The DHS call center also already has access to a foreign language line, which allows our vendor to conference into hotline calls and provide live translation services.
- To address students in foster care, an additional data exchange with CFSA is planned
- To address students who may not have social security numbers, data matches are being conducted by using the OSSE Student ID number
- To address students who may be living with disabilities, the option of mailing an EBT card is offered in addition to the ability to pick up in person. Additionally, the DHS call center already has access to a service that provides assistance for those with limited ability to hear.

3. The District plans to launch a campaign to inform residents of the program's availability and the fact that the call center will be re-launched. The District intends to use social media and printed flyers at meal distribution and free grocery sites. The District will also leverage the OSSE, DHS, and Mayor's Covid-19 response websites to disseminate information. The information provided in these channels will be to direct residents to apply for FARM if they have students attending an eligible school and to ensure parents know how to contact the call center with more detailed questions.
4. P-EBT information will be provided to SNAP and non-SNAP households identically. As in the previous iteration of the program, the District will conduct robo-calls and mail notices to all households when they are issued a payment. A new feature is that newly-mailed P-EBT cards will come in the SNAP card carrier, which contains regulation SNAP EBT card training information. P-EBT cards were not sent with any information in the past. The card carrier will contain information on how to PIN an EBT card, an explanation of where benefits can be used, an explanation of how benefits cannot be used, an explanation of violations and penalties, an indication that benefits are non-transferrable, and information for the FIS hotline. Information about the purpose of P-EBT, instructions for destroying an unwanted card, and contact information for the District P-EBT hotline will be disseminated through the formal notice informing a customer of their benefit.

Individual schools will also have tools to speak with parents; they will use a communications plan approved at the District level which will contain answers to frequently asked questions (FAQs) and talking points for speaking with families. This will be communicated from the District level by leveraging current tools, for example, weekly newsletters and bi-weekly school administration meetings.

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

*States should outline a process to manage cases of benefit over-issuance. The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.*

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

**Response:** [please use as much space as needed]

The District will issue P-EBT benefits to eligible children and households, using administrative data supplied by schools and other verification processes when necessary and available. While the District will not request repayments of benefits issued due to an error, the District will retract an unused

portion of the overpaid amount from the EBT account whenever possible if the payment error is confirmed. The District's experience is that P-EBT benefits issued to a wrong household often may not be accessed for an extended period.

The District of Columbia recognizes that USDA is responsible for ensuring accountability of funds for P-EBT purposes. The District acknowledges that as part of the USDA's oversight responsibilities, the USDA may hold District 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.

## **9. Benefit Issuance Reporting**

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

**Response:** [please use as much space as needed]

The District of Columbia 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 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.

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

## **13. Administration of State P-EBT Plan**

The District will administer P-EBT according to the terms of its approved State plan. If the District wishes to change any of the terms of its plan, the District 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:**

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Signature  
Print Name and Title

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Signature  
Print Name and Title

**Date of Request:** \_\_\_\_\_