

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

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| <b>Issuing Agency/Office:</b> | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program  |
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| <b>Summary:</b>               | (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 the 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). |
| <b>Disclaimer:</b>            | <b>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.</b>   |

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

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

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

**Response:**

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 and any subsequent amendments.

- a. The **date range** for the current plan will be from August 1, 2020 through September 30, 2021.
  - a. For **children in school**, the benefits will be for the school year (SY) 2020-2021 and will be administered throughout the plan (approval date through September 30, 2021). The plan will cover 10 months, simplified as August 2020-May 2021. The school year in Georgia has 180 mandatory days. The plan is based on 180 days in the year/10 months (18 days/month) as a simplifying assumption. Holidays and other days off are not included.
  - b. For **children ages 0-5 in child care**, the benefits will be from the beginning of the federal fiscal year (FFY) 2021 through the end of the school year, October 2020-May 2021.
- b. Below are the **upper-bound estimates monthly and the total P-EBT issuance amounts**. They are estimates due to lack of current data about school closures, which is further outlined in this plan. These figures represent the upper bound for the entire plan duration and will be adjusted with forthcoming data. The State does not anticipate that all children in the table below will be eligible for the benefits, but these are currently the best available figures. The figures are calculated using: 1) the number of students from Spring 2020 who were eligible for P-EBT in SY 2019-2020 (to be updated with 2020-2021 data); 2) the monthly benefit of \$122.76/child for school age children and \$122.76/child for child care children; 3) the assumption that all school districts and child care centers were closed or fully virtual during the period (will be updated with survey data). Again, data described in this plan will be updated once the school closure data and current enrollment files are collected. Benefit levels are further described in the “Benefits” section of the plan, including Hybrid statuses. The description of eligibility and benefits outlined in the remaining sections of the plan will be used for administration rather than these upper-bound estimates and assumptions.
  - a. **Estimated amount issued to school children in SNAP households:**  
\$61,419,283.20/month, \$614,192,832 total (10-month school year)
  - b. **Estimated amount issued to school children in non-SNAP households:**  
\$43,719,746.40/month, \$437,197,464 total (10-month school year)
  - c. **Estimated amount issued to children in childcare** (defined as 0-5 in SNAP-

eligible households): \$31,662,381.96/month, \$253,299,056 total (8 months in FFY21)

- c. **Estimated total upper-bound of P-EBT issuances:** \$1,304,689,352 Below are the estimated total **number of children** to which the State will issue P-EBT benefits. These are upper-bound estimates.
  - a. Estimated number of **school children in SNAP households: 500,320**
  - b. Estimated number of **school children in non-SNAP households: 356,140**
  - c. Estimated number of **children in childcare: 257,921**
  - d. Estimated **total number of children: 1,114,381**
- d. Estimated **total amount of administrative funds** the State needs to complete the work described in this State plan: EBT costs for P-EBT services (**\$15,488,820**) + data processing and collection, Georgia State University (**\$511,162**) + Communications and Customer Service Costs (**\$1,225,728**) + DFCS Dashboard build for troubleshooting **\$7800** (\$1560-development + \$6240[\$520/month maintenance cost x 12 months])=**\$15,999,982**. The State will provide detailed cost estimates and provide them to FNS for review and approval.

**Summary Table: Upper Bound Estimates**

|   | # Children | Daily Benefit | Monthly Benefit (Daily* Days) | Yearly Benefit (Monthly* Months) | # Months | Monthly Total (Monthly* Children) | Total (Yearly*Children) |
|---|------------|---------------|-------------------------------|----------------------------------|----------|-----------------------------------|-------------------------|
| School children in SNAP (18 days/month)     | 500,320    | \$6.82        | \$122.76                      | \$1,227.60                       | 10       | \$61,419,283.20                   | \$614,192,832           |
| School children not in SNAP (18 days/month) | 356,140    | \$6.82        | \$122.76                      | \$1,227.60                       | 10       | \$43,719,746.40                   | \$437,197,464           |
| 0-5 children in SNAP (18 days/month)        | 257,921    | \$6.82        | \$122.76                      | \$982.08                         | 8        | \$31,662,381.96                   | \$253,299,056           |
| P-EBT Benefit Total                         |            |               |                               |                                  |          |                                   | <b>\$1,304,689,352</b>  |
| Administrative Costs                        |            |               |                               |                                  |          |                                   | <b>\$32,722,330</b>     |
| Grand Total                                 |            |               |                               |                                  |          |                                   | <b>\$1,337,411,682</b>  |

- e. **Tentative P-EBT issuance schedule:** The tentative issue dates will be adjusted based on the plan’s approval date. The schedule below outlines the various target issuance dates and is further outlined in this plan. These dates contain three major contingencies: 1) USDA approval date; 2) collection and receipt of all necessary data; 3) provision of estimates for non-SNAP cases to card vendor to ensure timely order of P-EBT cards. Based on the unknowns related to these contingencies, these dates show issuances for school children in SNAP-eligible families, eligible school children in non-SNAP-eligible families, and children in child care who are SNAP-eligible. The month dates indicate the end of the month. Specific dates will be updated once all data is in hand. Children who are SNAP recipients will have benefits added to the head of household’s existing SNAP EBT cards. Non-SNAP recipients will have a new P-EBT card generated and mailed to the eligible child; this card will be used for subsequent payments. The EBT vendor will create a new notice to these families instructing them to hold on to

the card for future issuances. Families that contact DFCS regarding disputes to SY 2019-2020 benefits will be processed on an as needed basis.

- July 2021 Issuance File
  - Children in SNAP-eligible families who are 0-5 years old
    - **Eligibility months: October 2020-May 2021**
  
- August 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: August 2020-October 2020**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: August 2020-October 2020**
  
- September 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: November 2020-January 2021**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: November 2020-January 2021**
  
- October 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: February 2021-May 2021**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: February 2021-May 2021**

## 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 free and reduced meal (FRL) 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.

### **Response:**

The State of Georgia will use multiple data sources to gather eligibility information and distribute P-EBT benefits. Some of these data sources are currently available and in-hand; others need to be collected or transferred between agencies. All timelines are draft timelines and depend on final data transfers. The State will work as expeditiously as possible to get P-EBT benefits distributed to families.

Due to data availability, the State will process P-EBT benefits for the Child Care children in this plan first. The state will process benefits for public school children as the data is collected on a three-to-four-month schedule to avoid challenges with retailer supply, issuances and benefit processing. The State will update its plan, as necessary.

Benefits will be issued retroactively. The State plans to issue P-EBT retroactively and will bundle amounts for issuance according to the timeline above.

Demographic information regarding the student population will be sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance. For SNAP participants, the P-EBT benefit will be added to the household’s current SNAP EBT card. For non-SNAP households, a new P-EBT card will be mailed to the household with instructions to retain the card for future issuances.

- In summary, data will be collected, merged, deduplicated, and multiplied by monthly benefit levels. These include student enrollment data, free and reduced priced meals

(FRL) eligibility data, Community Eligibility Provisions (CEP) data, school status data, school operating predominant mode status, and SNAP data. These exist in different data systems or in some cases need to be collected. Details are listed throughout this plan and simplifying assumptions are noted.

- Furthermore, to receive benefits, children will have to meet all eligibility criteria as outlined in the subsequent sections. This means children will receive the benefit because they are:
  - Enrolled during SY 2020-2021 in a school that participates in the National School Lunch and School Breakfast Program (see “Enrollment” below),
  - Are eligible due to FRL, CEP school, or SNAP status (see “FRL, CEP, and SNAP status” below),
  - Enrolled in a school that was closed or operating at reduced hours or attendance for 5 consecutive days during SY 2020-2021 (see “School Status” below), and
  - Enrolled in a school whose predominant operating mode was fully virtual or hybrid (operating at reduced in-person hours) for each month (see “School Operating Mode” below).
- **Define eligible school children (Enrollment):** The State will use enrollment files submitted by all local public school districts to the Georgia Department of Education to determine student enrollment for SY 2020-2021. These files include only enrolled students for the current school year and include the school district of enrollment, so there is no concern about issuing benefits to previous years’ graduates or other non-students. They also include enrollment and withdrawal data. Military schools and private and non-traditional schools that participate in the National School Lunch and School Breakfast Programs will submit enrollment files directly to the Georgia Division of Family and Children Services to transfer to the Georgia Policy Labs (process to be determined).
- **Confirm eligibility for free or reduced-priced meals (FRL, CEP, and SNAP status):**
  - SNAP-recipients: Use SNAP data from the Georgia Division of Family and Children Services, which includes data updated monthly for eligible individuals
  - Non-SNAP-recipients
    - Public schools: The Georgia Department of Education will provide a list of potentially-eligible students for P-EBT. They will provide students eligible through:
      - the Community Eligibility Provision list of eligible schools and school districts for currently enrolled students for SY 2020-2021, and
      - FRL eligibility by using the SY 2020-2021 file of enrolled FRL-eligible children (produced June 2021) to ensure all eligible children are issued benefits. Throughout the school year, families submit applications for FRL through the school district; the data for eligible children is transferred to the Georgia Department of Education in June of each year. Additionally, the State has other pre-defined processes for data for other source categorically eligible children that will also be updated with the June 2021 files. FRL eligibility throughout this plan is defined as children who would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program

were operating normally, including children who are directly certified or determined “other source categorically eligible” or certified through the submission of a household application processed by the child’s school district. It also includes children eligible through the CEP process (above).

- Non-public schools
  - Military schools and private schools that participate in the National School Lunch and School Breakfast Programs will submit eligibility files directly to the Georgia Division of Family and Children Services to be transferred to the Georgia Policy Labs (to be determined).
- New children and transfer students
  - The enrollment files include all children who were enrolled in SY 2020-2021, including new children and transfer students.
- Children who become eligible during the year: Families were able to submit their FRL-eligibility paperwork through their local school district during the school year. Those children and other children who become categorically eligible during SY 2020-2021 will be in the SY 2020-2021 FRL list provided by the Georgia Department of Education in June 2021.
- If children are eligible in the 0-5 category, they will be processed through that eligibility criteria. If they are not, they will be processed through the school-based criteria. Because the data will be processed collectively, children will not be issued benefits under both criteria erroneously.
- Confirm child’s eligibility based on school’s eligibility for P-EBT (School Status) – The State will consider the child eligible if their school was closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year (SY 2020-2021). 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.
  - The State will gather this information through a survey to determine if children in those schools are eligible for P-EBT. The survey will be sent to schools through the Georgia Department of Education to collect these data (dates + duration). These data will be supplemented with phone calls to districts, as necessary. This process will be the same for SNAP and non-SNAP participants. Benefits cannot be issued until the school completes the survey.
- Confirm child’s **lack of access to meals at school** (School Operating Mode)
  - The process will be the same for SNAP-recipients and non-SNAP recipients.
  - The State will retroactively collect data from schools (public and private) about each school’s predominant operating mode for each month. These data will be collected through a survey sent by the Georgia Department of Education. These data will be consolidated in a database that can be used in concert with other eligibility data. For each month, schools will indicate if they are predominantly operating:
    - Fully virtually: all students attend virtually (no in-person option)
    - Hybrid: students have schedules that include some in-person and some virtual learning days
    - In-person: students are welcomed or encouraged to learn in-person full-

time

- **Update and re-establish each child’s schedule and frequency**
  - Fully virtual: If the majority of children (>50%) are learning in the fully virtual mode for the majority of the month, all eligible children in that school will receive fully virtual benefits for that month.
    - Majority is calculated as 10 days or more, (10/18 days per month = 56% of the month).
  - Hybrid: If the majority of children (>50%) are learning in a hybrid model for the majority of the month, all eligible children in that school will receive benefits based on the percentage of scheduled fully virtual days for that month.
    - The State will establish the benefit amount based on the hybrid schedule of the school. The data do not currently exist to propose a school-level benefit rate but will be collected through the school survey.
  - In person: For students attending schools that offer full-time (e.g., 5 days/week) face-to-face learning as the predominant learning mode, eligible students will only be:
    - the majority of parents elected virtual status for their students in that school—making all students in that school eligible for a fully virtual benefit (**Simplifying Assumption**).
  - To collect these data, the State will use a survey to determine the predominant school status for each month, as outlined above. The State cannot issue benefits for the enrolled children if the school does not complete the survey.
    - Fully virtual – data will be collected through the school survey to determine if the predominant learning mode was fully virtual for each month. No student-level data will be collected to determine the student’s learning mode.
    - Hybrid – data will be collected through the school survey to determine if the predominant learning mode was hybrid for each month. The percentage of days fully-virtual days for each month will be used to determine the school-level hybrid benefit amount. No student-level data will be collected to determine the student’s learning mode.
    - In-person – data will be collected through the school survey to determine if the predominant learning mode was in person for each month. The survey will determine if the majority of parents opted for fully virtual learning. If not, students in that school will not receive P-EBT benefits for that month. No student-level data will be collected to determine the student’s learning mode.
    - If a school switched from in-person to virtual learning in the middle of a month (or vice versa), whichever model was used for the majority of the month will be considered the predominant learning model for the month. For example, a school operating in-person at the start of the month had to switch to all virtual learning in the second week due to COVID quarantine, then the



- school would be considered fully virtual for that month.
  - The School Operating Mode data will be collected retrospectively for August 2020-May 2021.
- Georgia has a mandatory 180 school days per year. The State will use a simplifying assumption to issue benefits for 18 days/month over 10 months. (**Simplifying assumptions**)
- **Roles and responsibilities:** The following entities are involved in the administration of P-EBT:
  - Georgia Division of Family and Children Services (DFCS):
    - Providing and transmitting SNAP data to the Georgia Policy Labs at Georgia State University (GSU)
    - Collecting data from military schools and private schools and transmitting that data to GSU
    - Providing utilization data to GSU for analysis
    - Providing Client Id numbers for assignment to eligible non-SNAP families to GSU
  - DFCS Communication
    - Providing guidance on streamlined communications to other agencies
    - Updating and maintaining a P-EBT website for detailed information and post frequently asked questions
    - Producing user-friendly Q&A for recipients, social media, web page
    - Distributing communication materials statewide through existing networks
    - Ensuring community partners distribute P-EBT materials to DFCS constituents.
    - Conducting internal and external webinar sessions
  - Georgia Department of Education (GaDOE):
    - Determining if schools are a Community Eligibility Provision school or district
    - Transferring SY 2020-2021 FRL-eligibility and SY 2020-2021 enrollment data for K-12 students to GSU
    - Sending a survey to collect school status and school operating mode to the public school districts
    - Providing a list of non-public schools participating in the National School Lunch and School Breakfast Programs
    - Participating in communications efforts
  - Local school districts
    - Processing submissions for FRL-eligibility during SY 2020-2021
    - Uploading data to GaDOE during regular data submission timelines
    - Responding to the survey by the deadline provided
  - Private and military schools
    - Providing a list of enrolled FRL-eligible students to DFCS
    - Providing data related to school closures, virtual setting, and hybrid settings to DFCS
    - Responding to the survey by the deadline provided
  - Georgia Policy Labs and Georgia Health Policy Center at Georgia State University (GSU)

- Georgia Policy Labs: Processing the various data (clean, deduplicate, run eligibility criteria) and returning eligibility files using the eligibility as defined in this plan to the Georgia Division of Family and Children Services for payment processing; providing a data infrastructure for data processing
- Georgia Health Policy Center: Verifying and collecting school closure data from GaDOE surveys, military and private school surveys, online and direct contact with school districts
- Conduent
  - Issuing P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards.
  - Issuing P-EBT cards and information with the cards for non-SNAP families that explain the P-EBT program and how to activate the card
  - Returning data about usage total at statewide level

## 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.

### **Response:**

As outlined in the previous section, a school-level survey will collect information about each school's status and predominant learning mode for each month of SY 2020-2021. In addition to that, the following information is provided.

#### **Identify, confirm, and monitor**

- The State will consider children eligible if the school district is closed (including any delayed start or early closure to the school year), or the school district is operating with reduced attendance or hours. 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.). 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.
- The State will retroactively collect school closure data for August 2020-May 2021 using a Qualtrics survey designed by GSU. The survey will be sent to school leaders in all public school districts by the GaDOE to collect data. The State team will also collect school closure data directly from military and private school surveys.

## 5. P-EBT for Children in Child Care

### *Standard for P-EBT Eligibility*

A child is enrolled in a covered child care facility and 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 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.

### **Response:**

Due to the lack of child-level data for school and child care closures in the State, the State will use simplifying assumptions to determine eligibility based on school district closure data and licensed child care center data. (**Simplifying Assumptions, see below**)

The State of Georgia will use multiple data sources to gather eligibility information and distribute P-EBT benefits. Some of these data sources are currently available and in-hand; others need to be collected or transferred between agencies. All timelines are draft timelines and depend on final data transfers. The State will work as expeditiously as possible to get P-EBT benefits distributed. The State will issue Child Care benefits first.

The State plans to issue P-EBT benefits retroactively, as outlined in the executive summary. This will include lump sum benefits for October 2020-May 2021 for child care children first. Issuing lump sum benefits to all eligible child care children first in one month and then to all eligible school aged children in subsequent months (based on a three or four month period) will allow for a more streamlined even distribution of benefits, and simpler and easier communication and customer service to families.

The State will cross-reference this population with any children submitted through school eligibility to ensure a child does not receive duplicate benefits. Child care benefits will trump school benefits in the event of an overlap in periods for October 2020-May 2021. GPL will deduplicate records across school-based and 0-5 data to ensure children are not issued benefits under both eligibility criteria.

Demographic information regarding the eligible population will be sent via a file transfer to the EBT processor per the normal processing procedures but separate from the regular monthly issuance. For SNAP participants, the P-EBT benefit will be added to the household's current SNAP EBT card.

- **Define eligible children in child care (Enrollment):** The State will use a simplifying assumption due to the lack of statewide child care enrollment data. The State will define eligibility as a child aged 0-5 in a SNAP-eligible household. These data will come from

the Georgia Division of Family and Children Services, which holds the monthly SNAP data. **(Simplifying Assumptions)**

- **Confirm SNAP benefits (SNAP Eligibility):** The Georgia Division of Family and Children Services will use its SNAP records to verify SNAP eligibility. This data is updated monthly for eligible households and individuals within those households. If a child received SNAP for at least one day in the month, the child will be considered eligible for that month's P-EBT benefits.
- **Determine residence in area of closed schools (School Closures):** The State will use SNAP address data to determine the county of residence for each child. As parents frequently opt to enroll their children in child care close to their place of employment, which may not be in their county of residence, Georgia will issue a level of benefits based on the educational modes and closures of schools in the SNAP household's county or any contiguous counties. The State will align the SNAP household address to the applicable schools in that county and contiguous counties. 159 of 181 of Georgia's school districts are county based systems. For the 22 city-based districts, the eligibility will be based on the contiguous county districts (e.g., Marietta City Schools has one contiguous county, Cobb County; school closures for children in Cobb County will be based on closures in Cobb County or Marietta City Schools). The State will use simplifying assumptions to consider a child eligible if a school in that child's county or contiguous county is/was closed or operating with reduced attendance or hours for the months of October 2020-May 2021. Data collection for schools is outlined in the "School Status" section. **(Simplifying Assumptions)**
- **Eligibility for children *not* in the area of school closure or operating with reduced attendance (School Closures):** The State is unable to collect child-level data for closed child care centers or those operating with reduced attendance or hours. As such, it will rely on data aligned with school closures and operating modes in the child's county of residence and any contiguous counties.
- There are not currently any **State or local public health ordinances** that limit the capacity of child care facilities in response to COVID-19 in the State.
- **Update and re-establish each child's schedule and frequency: (Simplifying Assumptions)**
  - Because the State does not have access to child-level enrollment or attendance data, the State will use simplifying assumptions. The State will use monthly data from SNAP to confirm eligibility and data collected for school statuses and operating modes (described in the School section).
  - Simplifying assumptions as noted throughout.
    - A school must be closed for 5 consecutive days or operating at reduced attendance or reduced hours for 5 consecutive days in the child's county of residence or any contiguous county. Schools operating on a virtual status or hybrid status for 5 consecutive days will be considered to meet these criteria. This simplifying assumption is due to the lack of child-level data.
    - Once the minimum threshold has been met, the State will use a simplifying assumption.
      - If a school in the child's county of residence or any contiguous county is operating with a predominant mode of fully virtual, then the child will receive fully virtual benefits for that month.

- If there are no fully virtual schools in the child’s county of residence or any contiguous county, but there is a school in that same area operating with a predominant hybrid learning mode, then the child will receive the hybrid benefits amounts aligned with that school’s schedule for the month (or an average if the hybrid benefit amounts differ for more than one school in that area).
    - If there are no schools in the child’s county of residence or any contiguous county that are operating with a predominant mode of fully virtual or hybrid, then the child will not receive benefits for that month.
  - To issue benefits at a more specific residential area than county level or to specifically identify which school serves a specific residential address would require additional months of effort and significantly increase the administrative costs needed for the child care issuance group.
  - There are a significant number of child care facilities spread across Georgia and tracking data associated with each is not feasible, so the State is proposing to issue P-EBT benefits based on the school mode that serves the SNAP-eligible child’s residence area. However, many schools and school districts serve multiple ZIP codes, and parents do not always select their child care facility based only on where they live. Parents may choose a child care facility closer to their place of employment or their route to and from their place of work. This could include a child care facility that is in a bordering county and not necessarily the county of residence. For example, a parent who resides in Gwinnett County could work in DeKalb County and thus enroll their child in a child care center in DeKalb County.
- **Roles and responsibilities:** The following entities are involved in the administration of Child Care P-EBT:
  - Providing and transmitting SNAP data to the Georgia Policy Labs at Georgia State University (GSU)
  - Providing utilization data to GSU for analysis
  - Georgia Division of Family and Children Services (DFCS):
    - Providing and transmitting SNAP data to the Georgia Policy Labs at Georgia State University (GSU)
    - Collecting data from military schools and private schools and transmitting that data to GSU
    - Providing utilization data to GSU for analysis
    - Providing Client Id numbers for assignment to eligible non-SNAP families to GSU
  - DFCS Communication
    - Providing guidance on streamlined communications to other agencies
    - Updating and maintaining a P-EBT website for detailed information and post frequently asked questions
    - Producing user-friendly Q&A for recipients, social media, web page
    - Distributing communication materials statewide through existing networks

- Ensuring community partners distribute P-EBT materials to DFCS constituents.
  - Conducting internal and external webinar sessions
- Georgia Department of Education (GaDOE):
  - Sending a survey to collect school status and school operating mode to the public school districts
  - Providing a list of non-public schools participating in the National School Lunch and School Breakfast Programs
- Local school districts
  - Uploading data to GaDOE during regular data submission timelines
  - Responding to the survey by the deadline provided
- Bright from the Start: Department of Early Care and Learning (DECAL)
  - Assisting with communications efforts
- Georgia Policy Labs and Georgia Health Policy Center at Georgia State University (GSU)
  - Georgia Policy Labs: Processing the various data (clean, deduplicate, run eligibility criteria) and returning eligibility files using the eligibility as defined in this plan to the Georgia Division of Family and Children Services for payment processing; providing a data infrastructure for data processing
  - Georgia Health Policy Center: Verifying and collecting school closure data from GaDOE surveys, military and private school surveys, online and direct contact with school districts
- Conduent
  - Issuing P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards
  - Returning data about usage total at the statewide level

Because the benefits will be issued retrospectively, the data collected about school statuses and child care centers will be as accurate as the data collected. **(Simplifying Assumptions)**

## 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 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<br>July 1, 2020 -<br>June 30, 2021 | Free Reimbursements<br>USDA School Meal Programs |           |        |                |
|---|--|-----------|--------|----------------|
|   | Lunch  | Breakfast | Snack  | Daily<br>Total |
| Contiguous U.S.                                 | \$3.60   | \$2.26    | \$0.96 | \$6.82         |

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>

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>

### Response:

Georgia is structuring its benefit levels in a way that is most beneficial to students, uses the most accurate data, and reduces hardship and burdens on families.

#### All Eligible Children

The State will use retrospective data for August 2020-May 2021 for school aged children and data for October 2020-May 2021 for children in child care (aged 0-5).

These data will be multiplied by the typical days in each month, using a smoothing of Georgia's mandatory 180 school day calendar across August-May (180 mandatory days/10 months=18 days/month) for school aged children (**Simplifying assumption**).

- Students will be issued benefits using the federal reimbursement rate for School Year (SY) 2020-2021, as specified by USDA. The benefit is multiplied by the number of school days that the eligible student did not receive a free or reduced-priced meal at the school due to the school's closure or reduced attendance or hours. The daily meal rate per child in Georgia is \$6.82.
- Georgia will use the following method for school-aged children and children in child care using the process outlined elsewhere to determine the predominant learning mode per month. (**Simplifying assumption**)
  - Fully virtual: 18 days per month = \$122.76/month
    - This will allow Georgia to have a consistent benefit amount of \$122.76 (\$6.82 x 18 days) per month to reduce household confusion and avoids



calculating specific holiday closures on a monthly basis. This is based on the mandatory 180 days that schools have in Georgia.

- Hybrid: Will be calculated as the percentage of virtual days at the school per month. This data is not yet available; an example is provided.
  - *For example*, if school A's predominant learning status for the month is 1 day a week virtual, 4 days a week in person, the hybrid benefit will be (calculated as  $1/5 = 20\%$  of the monthly benefit, or \$24.55)
- Fully in-person: not eligible

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

**Response:**

Upon approval of the P-EBT plan, Georgia will issue benefits using the data it has available and will actively collect other data to complete benefit issuances. The State may need to change the issuance schedule depending on when the plan is approved. Preparation activities by the State are already underway.

**Timeline:**

| <b>Days</b> | <b>Activities</b>   |
|-------------|---|
| 0           | USDA approves the State’s plan  |
| 3           | Representatives from all participating partners join overview call  |
| 4           | Create joint agency press release   |
| 4           | Notification shared with P-EBT advocacy working group to assist with user-friendly Q&A and other communication planning                                   |
| 5           | GaDOE sends school status and operating mode survey to all schools  |
| 10          | Data sharing agreements are approved  |
| 10          | Notification is posted/shared with the public   |
| 21          | Data is transferred to Georgia Policy Labs from DFCS  |
| 21          | School status and school operating mode survey is completed   |
| 41          | Child Care eligibility file is created and sent to DFCS for processing, issuance to SNAP households for 0-5 begins  |
| 60          | GaDOE transfers SY 2020-2021 data to GSU  |
| 60          | Call center becomes active  |
| 90          | Fully virtual and hybrid eligibility file is created and sent to DFCS for processing and subsequent EBT processing by Conduent for School benefits begins |
| TBD         | Continued issuance as outlined through existing cards and new cards and letters as applicable   |

The tentative issue dates will be adjusted based on the plan’s approval date, adjusting the months below based on the timeline above. The schedule below outlines the various target issuance dates. These dates contain three major contingencies: 1) USDA approval date; 2) receipt of all necessary data; 3) provision of estimates for non-SNAP cases to card vendor to ensure timely order of P-EBT cards. The month dates indicate by the end of the month. Specific dates will be updated once all data is in hand. SNAP recipients will have benefits added to the head of household’s existing SNAP EBT card. Non-SNAP recipients will have a new P-EBT card generated and mailed to the eligible child; this card will be used for subsequent payments. The EBT vendor will create a new notice to these families instructing them to hold on to the card for future issuances. Families that contact DFCS regarding SY 2019-2020 benefits will be processed on an as needed basis.

- July 2021 Issuance File
  - Children in SNAP-eligible families who are 0-5 years old
    - **Eligibility months: October 2020-May 2021**

- August 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: August 2020-October 2020**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: August 2020-October 2020**
  
- September 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: November 2020-January 2021**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: November 2020-January 2021**
  
- October 2021 Issuance File
  - School children who were enrolled in a school operating with a predominant fully virtual learning mode
    - **Eligibility months: February 2021-May 2021**
  - School children who were enrolled in a school operating with a predominant hybrid mode
    - **Eligibility months: February 2021-May 2021**
  
- SNAP recipients will have benefits added to the head of household's existing SNAP EBT card. Non-SNAP recipients will have a new P-EBT card generated and mailed to the eligible child; this card will be used for subsequent payments. For non-SNAP-eligible children, the P-EBT card will be issued in the child's name. The State will establish a staggered schedule to issue P-EBT benefits.
- The State will use the issuance type "L" as used in the previous P-EBT program.
- The draw down priority will be first in-first out.
- P-EBT benefits will follow the same expungement rules that the State follows for SNAP.
- If customers require a replacement card, they will be instructed to contact Conduent to request a replacement card.

## 8. Customer Service

### *Recommended Standard for Household Support*

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

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

### **Response:**

Due to multiple contributing agencies for P-EBT, the State is working to simplify its communications protocols as much as possible for the best customer service for families in Georgia.

- **Resolving disputes or issuance errors:**
  - If families reach out to DFCS to resolve issues related to a dispute about eligibility or amounts of benefits from SY 2019-2020, DFCS will work with GaDOE as a data provider to determine if benefits should be issued to those families. If eligible, DFCS will receive approval from FNS to issue the benefit and work with its EBT team to issue retroactive benefits to families.
  - Due to lack of data availability about the student learning mode at the individual level and the inability to collect these data from all school districts, all benefit determinations will be made at the school level by the predominant operating mode for the month. All appeals about school operating mode will have to be verified by the school or school district and submitted via GaDOE to DFCS. If the school does not respond to the survey about the school operating mode, no benefits will be issued until those data are provided.
  - The State recommends throughout the school year that households reach out to their enrolled school district to ensure 1) their address is up to date, and 2) they submit the FRL-eligibility application if they have not done so for this school year or their circumstance has changed. P-EBT eligibility will be determined by each school district for each child per month via the data file submitted by the school districts instead of an application process. Therefore, Georgia does not anticipate access issues.
  - The State will work to resolve specific issues related to specific populations. For all these groups, the State will work with community partner agencies and advocacy groups to ensure special populations receive the help they need.
    - Homeless children – GPL will flag the eligibility file with students and children who are identified as homeless. If children are identified as homeless, DFCS will work with GaDOE and school districts' homeless liaisons to deliver the cards through the school district rather than by direct mail. This is to avoid likely bad address data for students experiencing homelessness. More details will be determined through

forthcoming meetings to confirm this process. However, we anticipate students will be directed to their schools and will sign an attestation that they picked up the card. Those attestations will be filed and made available upon request by the school districts.

- Limited English Language Proficiency – The State will use the parent communication language in the student enrollment files to distribute benefit information in that language to the greatest extent possible.
- Children in foster care – GPL will flag the eligibility file with students and children who are in foster care. GPL will ask DFCS to update those files with the most currently available data from the SHINES system prior to processing. More details will be determined through forthcoming meetings to confirm this process
- Children without Social Security numbers – The State will use a variety of matching criteria and does not anticipate this as a problem.
- Households without internet access and disabilities – Families do not need to apply for this program, so this will not be an eligibility issue. Mailings will help explain benefits to those not reached through social and other media platforms.
- School districts will use this updated information to submit to GaDOE in June 2021, and the State will use these files to process benefits for SY 2020-2021.
- SNAP recipients can update their address or eligibility information via DFCS. These monthly data will be used in subsequent data pulls to determine retrospective eligibility.
- DFCS will work with the school districts to address any access issues between the files and the EBT vendor.
- **Public information campaign and P-EBT recipients**
  - The State will conduct public information campaigns (website, social media, earned print/web media) to alert the public about the P-EBT program. The State will coordinate this effort with community partners and advocacy groups.
  - The State will encourage all participating agencies in this plan to post the same information on their websites for unified information. DFCS will maintain a P-EBT focused webpage and encourages all partners to do the same with consistent messaging.
  - The State will use community partner agencies, food banks and other local agencies to amplify its message, utilizing the coordination of the DFCS Customer Contact Center and P-EBT troubleshooting workgroup. The State will provide user-friendly Q&As that partner agencies can use in their messaging.
  - The State will conduct public information campaigns (websites and social media) to alert those receiving benefits of the purpose of P-EBT and how it should be used. The State will coordinate this with community partner agencies.
  - The State will encourage all participating agencies in this plan to post the same information on their websites for uniform information. This will include the calculations used at a school/district level, so families can understand the benefit levels.
  - Customers will also receive information about their P-EBT benefits.
  - DFCS will ask GaDOE to send templated information to all public school districts about P-EBT and to ensure that all of GaDOE is aware of the P-EBT

- program.
- The State will use the United Way 211 line, DECAL, and Family Connections to communicate information about the P-EBT program.
  - Create an FAQ to cover the information for SNAP and non-SNAP households below that will be included on the website and mailed to recipients.
    - A description of P-EBT
    - A decision tree to understand why they are getting benefits and why they are getting the amount they are getting
    - Amounts to be expected for each school
    - The months they are currently receiving benefits for and when future benefits will be issued
    - Instructions for PINs for P-EBT cards
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used
    - Explanation of violations and penalties
    - Indication that benefits are non-transferable
    - Information regarding a website for questions

If customers **do not want the P-EBT card**, they may dispose of the card.

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

## 9. 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:**

Any potential benefit over-issuance reported to the agency will be submitted to the DHS Office of Inspector General (OIG) for investigation and resolution. The OIG investigator will investigate the over-issuance by checking the information submitted by the school district and requesting additional information if necessary. If, after investigation, it is determined that there was an over-issuance (for example, benefits were issued to the wrong household or benefits were issued to a household that was not entitled to them), OIG will set-up a claim to recoup the benefits. The agency will provide the corrected issuance to the eligible household. Georgia will not reduce the SNAP benefits of a customer as part of the repayment arrangement.

## **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:**



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Signature  
Tom C. Rawlings  
Director, Georgia Division of Family and Children Services



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Signature  
Dr. Linette Dodson, RD, LD, SNS, FAND  
Director, School Nutrition Program, Georgia Department of Education

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

Appendix:

**Georgia P-EBT 2020-2021 Process**

