

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	January 29, 2021
<b>Replaces:</b>	N/A
<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 childcare during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116159) 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> The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.***

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

1. State: Oregon \_\_\_\_\_

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

3. **Executive Summary:**

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

*Note that P-EBT benefits for school children are available from the start of school year 20202021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.*

- a. The **date range** covered by this State plan or amendment
  - for children in school
  - for children in child care
- b. Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
  - Estimated amount issued to non-school children in child care
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

- Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
  - e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
    - School children in SNAP households
    - School children in non-SNAP households
    - Children in child care

**Response:**

The Oregon Department of Human Services (ODHS) and Oregon Department of Education (ODE) commits to reporting to USDA any significant increases or decreases in the data points throughout the approved plan period.

ODHS and ODE will issue Pandemic EBT (P-EBT) benefits through the newly designed Oregon School Meal Benefit (OSMB) system. The development of a new system for PEBT is essential to Oregon being able to administer and deliver benefits to children effectively.

Oregon’s plan recognizes P-EBT as an independent program with complicated rules and restrictions. OSMB supports program administration in the following ways:

- P-EBT eligibility hub for student level data statewide.
  - Accessible for authorized school staff and assigned P-EBT staff within ODE and ODHS
  - Authorized staff can update certain student and institution data
  - All staff with access can provide customer service
  - Assigns benefits by institution, district, or geographical areas
  - Issues benefits efficiently and accurately
  - Provides oversight for agencies and schools through ad-hoc reporting.
- a. Oregon’s P-EBT plan for the 2020-2021 school year includes:
    - Supplements for students from 08/26/2020-09/30/2020; and
    - Issuances for students and SNAP children in deemed childcare from 10/01/2020-09/30/2021.

b. Oregon estimates the following monthly and total amounts:

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<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

- A total estimate for September supplement of \$15,736,000.00; and
- A total estimate for the 2020-2021 school year of \$558,695,616 in 8 monthly installments of \$69,836,952 as detailed below:

<b>Group</b>	<b>Estimated Total</b>	<b>Estimated Monthly</b>
Non-SNAP	\$318,414,016	\$39,801,752
SNAP	\$153,241,600	\$19,155,200
SNAP under 6, deemed childcare	\$87,040,000	\$10,880,000

c. An estimated 572,457 children in Oregon will be issued P-EBT benefits, this includes:

- 160,000 students in SNAP households; and
- 332,457 students in non-SNAP households; and
- 80,000 SNAP children in childcare.

d. Administrative funds are estimated at \$11,304,350

e. Oregon will issue all P-EBT benefits using a retroactive process.

P-EBT benefits will be issued based on the last digit of the individual’s SSN, if known. If not known, the benefits will be issued based on the last digit of the P-EBT case number. The batch issuance period is staggered.

In July, ODHS will issue P-EBT benefits to students missed or under-issued in September 2020. Data specific to September issuance resolutions will be tracked separately from the new FFY 2020-2021 P-EBT state plan.

#### **4. P-EBT for School Children**

##### **A. Eligible Children**

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, **or**
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, **or**
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 **and** the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in PEBT (e.g. which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

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

The Oregon Department of Human Services (ODHS) and the Oregon Department of Education (ODE) are partners in the administration of P-EBT.

ODHS is responsible for issuing benefits for all eligible students. Students are identified as eligible by ODE based on data provided from local area schools. ODE will provide a comprehensive list of enrolled and eligible students in both public and private schools for SY 2020-2021. Previous year data will not be utilized for benefit eligibility/issuance in SY 2020-2021.

The rules functionality supporting OSMB allows for accurate eligibility determinations and adheres closely to NSLP eligibility rules for students who are no longer enrolled or transfer institutions.

For example, when a student moves to a non-CEP school from a CEP school, PEBT benefits will align with NSLP guidance allowing 30 days of additional benefits for the student. If the student is not determined income or otherwise categorically eligible, benefits will end following the 30-day grace period.

OSMB generated ad-hoc reports allow for oversight and data validation. Ad-hoc reports may be filtered by institution, school or statewide. These reports will be utilized to meet all federal reporting requirements.

OSMB allows for schools and ODE to remove students who are no longer enrolled. Students who are no longer enrolled, including those who have graduated, will not receive P-EBT benefits. ODE will coordinate with school sponsors to maintain accurate enrollment records in OSMB. This includes informing students who have moved from a CEP school to a non-CEP a new free and reduced meal application is needed to establish P-EBT eligibility.

OSMB allows authorized school representatives and ODE to add newly enrolled students and update eligibility status. For eligibility determinations made in SY20-21, benefits will be issued retroactively to the beginning of the school year.

To support OSMB, and the administration of this P-EBT State Plan, each agency is responsible for the following:

ODE:

- Maintain student eligibility for SY 2020 – 2021 through the OSMB system

- Provide the total Student Enrollment Data (SED) File to ODHS through secure file transfer no less than twice a year. This file includes both enrollment and Free and Reduced Lunch status (FRL).
- ODE will support school administrative staff with accessing OSMB.
- ODHS and ODE will support OSMB by providing ongoing technical support on using the system, including training and online resource materials.
- ODE has final oversight to ensure updated school operating status and meal service is reported.
- ODE has final oversight to ensure updated student records reflect accurate eligibility for free and reduced meals. Both schools and ODE will update student records which includes adding new students and removing unenrolled students. Students that transfer between school districts can be updated by either the incoming or outgoing institution.

ODHS:

- Securing necessary technology for benefit delivery
- Receiving the original FRL files
- Secure necessary EBT contract change orders
- Develop and issue correspondence to eligible students • Establish a P-EBT call center
- Collaborate with ODE on process and communications
- Collaborate with ODE to review card error and make the necessary corrections
- Collaborate with ODE to develop and execute a reconsideration process for institutions

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

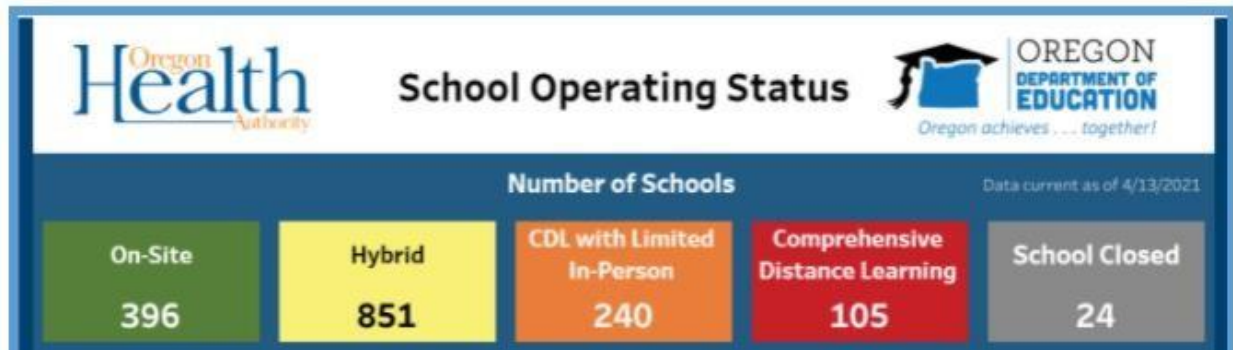
- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

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

Oregon has operated under the ODE and Oregon Health Authority (OHA) "Ready Schools, Safe Learners" guidance since the early stages of the pandemic. This includes collecting weekly reports from all education Institutions in the state, beginning in



September of 2020. Resulting School Operating Status and County Health Metrics are released publicly and include the number of schools operating in five different categories, including the historical reporting for each institution.



<https://www.oregon.gov/ode/students-and-family/healthsafety/Pages/2020-21-SchoolStatus.aspx>

ODE shares the detailed results of this weekly reporting with ODHS.

Revisions to the weekly status report were implemented in March to ensure the necessary information is captured to best support P-EBT. A survey will be offered to schools to ensure consistent data points missing in earlier weekly status reports prior to March enhancements.

This data will inform the monthly P-EBT benefit level for eligible enrolled students for each month of the 2020/2021 school year P-EBT state plan.

### **Simplifying Assumptions**

Due to the complexities and infrastructure that currently exists in Oregon allowing for individual schools to operate independently, P-EBT benefits can only be determined at a school level and represent the highest benefit allotment based on the predominate operating model.

Oregon will have a limited reconsideration process to revisit benefit allotments at a school level. Due to significant workload and capacity concerns, Oregon is unable to resolve benefit allotments on an individual level.

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

### *Standard for P-EBT Eligibility*

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

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

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
  - the child's child care facility is closed or is operating with reduced attendance or hours, or
  - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in PEBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

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

In accordance with Oregon Executive Order 20-12<sup>3</sup> childcare centers are operating in a reduced capacity limited to 10 children or fewer. Given this Executive Order, it can be assumed that childcare facilities statewide have reduced attendance.

ODHS is responsible for identifying children under the age of six who receive SNAP as enrolled in a covered childcare facility. Oregon will issue retroactive benefits as an administrative simplification back to October 2020 and through the date of the first issuance which will be in July. Benefit levels will be determined prospectively based on the operating status of schools in the county corresponding to the child's address and SNAP eligibility for the month.

SNAP children age six not yet enrolled in school but enrolled in a covered childcare facility will be eligible for P-EBT. ODHS will verify the child's enrollment in a covered childcare facility with reduced attendance. As ODHS and ODE do not have direct ability to identify this population of children through school closure information, public communications and stakeholders with access to this population of children will be imperative to spread awareness.

## 6. Benefit Levels

### *Standard for Benefit Levels*

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

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<sup>3</sup> [https://www.oregon.gov/gov/admin/Pages/eo\\_20-12.aspx](https://www.oregon.gov/gov/admin/Pages/eo_20-12.aspx)

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

**Notes:**

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

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

### Statewide Benefit Levels

Oregon has 180 instructional days<sup>4</sup> annually that predominately fall into a 9-month school year starting in September and ending in May. To arrive at a statewide monthly

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<sup>4</sup> <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=250536> and [https://nces.ed.gov/programs/statereform/tab5\\_14.asp](https://nces.ed.gov/programs/statereform/tab5_14.asp)

instructional day calculation of 20, Oregon divided the total instructional days by the 9-month period (September-May) they predominately fall.

Benefit levels will be determined by school and are based on the actual predominate learning model utilized by the majority of the enrolled students at the school.

### **Benefit Level 1**

The full benefit amount is \$136.00 (20 x \$6.82). Oregon's full benefit is inclusive of students who lost access to free and reduced meals based on their schools operating model and access to on-site meals.

At least 75% of students are attending virtually each day and are not receiving NSLP meals on site as part of the instructional day.<sup>5</sup>

### **Benefit Level 2**

A representative sample of both urban and rural school districts identified the predominate hybrid education model as 3 days off-site and 2 days on-site weekly.

This averages 11 missed on-site instructional days providing a partial benefit amount of \$75.00 (11 x \$6.82).

At least 25% of students are attending virtually each day and not receiving NSLP meals as part of the instructional day<sup>6</sup>

### **Benefit Level 3**

Students attending schools providing meal service in a fully on-site operating model are not eligible for P-EBT.

At least 75% of students are attending school on-site each day and receiving NSLP meals as part of the instructional day.

### **Children age 6 and younger in covered childcare facilities**

Children age 6 years and younger in a childcare facility are eligible effective October 1<sup>st</sup>, 2020 and are based on the following criteria:

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<sup>5</sup> If 75% of students are attending virtually on a given day, then in almost all cases, this means that at least half of students in the school have 100% virtual schedules.

<sup>6</sup> If 25% of children are attending virtually on a given day, then in almost all cases, at least half of students have a hybrid schedule. (The typical hybrid schedule in Oregon schools is 3 virtual days and 2 in-person days per week, or 60% virtual days.)

- If one school in the county is closed or fully virtual, then all eligible children whose residence is in the same county would receive the full P-EBT benefit for the month (Benefit Level 1).
- If no schools in the county are closed/fully virtual, but at least one school is operating at reduced hours/attendance, then all children whose residence is in the same county would be eligible for the partial P-EBT benefit (Benefit Level 2).
- If all schools in the county are fully open/on-site, then children in the county would not be eligible for benefits unless the covered childcare facility the child attends is closed or operating at reduced hours/attendance or the executive order is still in place and can be used to provide all children under the child care provision with the partial P-EBT benefit (Benefit Level 3).

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

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

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

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?

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

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

Oregon's tentative timeline is contingent on both the approval of this plan, as well as the production of the new OSMB system.

Benefit issuance timelines detailed below:

Benefit Months	Date of Batch Issuance
October-December	No later than July 30 <sup>th</sup>
Jan-March	No later than August 30 <sup>th</sup>
April- May	No later than September 30 <sup>th</sup>
September 2020 Supplement	No later than September 30 <sup>th</sup>

\*P-EBT benefits will be issued based on the last digit of the individual's SSN if known. If not known the benefits will be issued based on the last digit of the P-EBT case number. The batch issuance period is staggered.

EBT card issuance:

- P-EBT benefits will be issued to active EBT cards (including those EBT cards issued during Spring P-EBT). This will minimize disruption and confusion for existing card users.
- The system is programmed to differentiate between other benefit issuance types and SNAP/non-SNAP households using specific program and assistance codes
- P-EBT will be programmed as the first draw/spend priority
- P-EBT benefits will be expunged after issuance in alignment with the SNAP benefit expungement process
- FIS will mail card to non-SNAP new P-EBT cases. FIS will mail generic P-EBT white plastic cards with Oregon's name, cardholders name, and Oregon's current reverse side printing on the backside of the card, and process mail returned to FIS. FIS will send a Returned Mail report back to ODHS in a secure daily file
- Returned mail received by ODHS will be processed through a Central PEBT Team. Attempts will be made to connect the EBT card with the eligible child before using standard EBT destruction procedures.
- ODHS will replace EBT cards at the request of the household. In the previous implementation of P-EBT, Oregon communicated to households to retain their EBT cards and expects this will reduce the amount of replacement requests.

## 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 PEBT households.

- How will the State resolve dispute or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.



- Describe the State’s public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit?  
Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
    - A description of P-EBT
    - Instructions for PINing a P-EBT card
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
    - Explanation of violations and penalties, such as trafficking
    - An indication that benefits are non-transferable
    - Instructions for destroying the card, if they want to decline benefits
    - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
    - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
  - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

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

P-EBT public inquiries are supported through:

- Hotline operated through 211info (503-945-6481) will assist families with general questions and escalate families to ODHS for case specific inquiries. Limited English proficiency callers will be assisted in their preferred language. 211info will maintain access to a phone-based language bank for translation services in 140 languages.

- ODHS branch office and phone inquiries utilizing bilingual staff. Limited English proficiency callers will be assisted in their preferred language using the Language Line interpreting service.
- Email answered by bi-lingual ODHS central P-EBT staff: [ebt.schoolmeals@dhsosha.state.or.us](mailto:ebt.schoolmeals@dhsosha.state.or.us)
- Up to date program information displayed on web: <https://www.oregon.gov/dhs/assistance/food-benefits/pages/p-ebt.aspx>
- Specified school personnel and ODE staff with access to updating student eligibility information and viewing P-EBT information through OSMB; and
- Business processes established for ODHS field offices.

Internal communication escalation paths will be developed between ODE, ODHS, schools and 211info to support consistent information and reduce the amount of redirection among the different agencies.

To best serve and ensure accessibility to P-EBT:

- ODHS Self-Sufficiency Program (SSP) and Child Welfare will collaboratively develop processes and communications that best support foster youth
- ODE and school Homeless and Migrant Liaisons will collaboratively develop processes and communications to best support homeless and migrant students; and
- All communications will be available in multiple languages and alternate formats:
  - Notices are available in 12 languages including: Arabic, Chinese (Simplified), Chinese (Traditional), Chuukese, English, Karen, Nepali, Russian, Somali, Spanish, Ukrainian and Vietnamese.
  - ODHS webpage will be available in English and Spanish
  - Alternate format requests will be supported
  - 211 will staff hotline to meet multilingual needs of callers

Public Information Campaign (not limited to the following)
Print and Media Communications
Social Media
Community Partners
ODE and ODHS Webpages
School Parent Communications

Information regarding opting-out of P-EBT will be included on benefit issuance notices, webpages, and through email and phone responses related to public inquiries. School personnel, ODE or ODHS can update in OSMB if a family request to opt-out of P-EBT. The system will maintain this status for P-EBT unless otherwise requested by the family.

A program information and benefit issuance notice will be sent to all P-EBT participants at the time the first benefit is issued. Information will also be available on the ODHS and linked from ODE webpages. Information will include:

- The purpose of P-EBT
- How to use the benefit
- Explanation of where benefits may be used
- Explanation of eligible foods and non-eligible items
- Explanation of violations and penalties, such as trafficking
- An indication that benefits are non-transferable
- Instructions for card destruction and how to decline benefits
- Hotline and website information for questions or if assistance is needed; and
- A brochure will be mailed with any EBT card providing instructions for setting up a PIN and with information on how to use the card.

Notice Type	Distribution Schedule	Responsible
P-EBT Information and Benefit Notice	Time of Benefit Issuance	System Generated
EBT Card Brochure	With EBT Card Mailing	FIS or ODHS
End of Program	45 Days Before Program End Date	System Generated

## 9. Over-issuance of P-EBT benefits

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

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

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for PEBT 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]

ODHS will model the overpayment approach after the established SNAP claims management plan. SNAP benefits will not be reduced to settle a P-EBT claim. In consideration that households are not submitting an application for P-EBT benefits, each child will be considered as one household and each month is reviewed individually. In accordance with the states approved SNAP overpayment cost effective determination a threshold of \$200<sup>7</sup> will be used for claim considerations.

#### **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.

Response: Oregon will complete the FNS-292, FNS 46, 388 and 778 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.

Response: Oregon intends to submit a P-EBT Budget Plan using the FNS-366A Program and Budget Summary Statement including the estimated administrative costs. Oregon will report all administrative expenditures on the FNS-778 SNAP Federal Financial Report as outlined in the FNS-366a.

## **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.

Response: Oregon will continue to comply with civil rights requirements including 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.

Response: Oregon intends to administer P-EBT according to the terms of its approved State plan and will notify USDA of any necessary modifications for review and approval.

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

\_\_\_\_\_  
Signature  
Print Name and Title

\_\_\_\_\_  
Signature  
Print Name and Title

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