

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

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

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

- a. The ***date range*** covered by this State plan or amendment.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households

Response:

Hawaii will build off its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from October 1, 2020 through June 30, 2021. Should additional funding for PEBT becomes available, Hawaii will modify the date range of the current plan. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The estimates of P-EBT issuance during the date range coverage period are as follows:

For the previously issued months of August and September 2020, snack benefits (\$1.13) per day for students will retroactively be paid. The following are the estimates for payments:

- Total retroactive issuances of \$2,435,982
 - Estimated retroactive amount issued to school children in SNAP households is \$1,282,975
 - Estimated retroactive amount issued to school children in non-SNAP

households is \$1,153,007

For the months of October – February 2021, because all schools continue to use a distance learning mode the following are the estimates for payments:

- Monthly issuances of \$14,012,284
 - Estimated monthly amount issued to school children in SNAP households is \$7,379,944
 - Estimated monthly amount issued to school children in non-SNAP households is \$6,632,340
- Total issuance of \$70,061,420 (monthly estimate multiplied by the five months in the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$36,899,720
 - Estimated total amount issued to school children in non-SNAP households is \$33,161,700

For the months of March 2021 and on-going, per HDOE estimates, approximately 67% of schools will be instituting a hybrid model. Based on this best available information the following are the estimates for payments for the balance of the school year:

- Monthly issuances of \$9,144,207
 - Estimated monthly amount issued to school children in SNAP households is \$4,718,121
 - Estimated monthly amount issued to school children in non-SNAP households is \$4,426,086
- Total issuance of \$27,432,621 (monthly estimate multiplied by the three months remaining in the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$14,154,363
 - Estimated total amount issued to school children in non-SNAP households is \$13,278,258

The estimated total number of children to which the State will issue P-EBT benefits is approximately 97,988.

- Estimated number of school children in SNAP households is 51,608
- Estimated number of school children in non-SNAP households is 46,380

Hawaii is requesting \$3,652,190 to cover the administrative costs with the on-going implementation for the P-EBT benefits. Hawaii's initial implementation of P-EBT was designed as a one-time occurrence and utilized in-house staffing to carry out the services. In order to support P-EBT as an on-going effort, while also managing the increase demand for SNAP and other assistance programs, P-EBT customer support will need to be out-sourced.

The following is the breakdown of the administrative costs being requested:

System Costs – eWorld Enterprise Solutions	\$1,323,190
Customer Service – eWorld Enterprise Solutions	\$1,676,000
P-EBT unique cards issuance - FIS	\$ 500,000
Notices to recipients – Cardinal Services	\$ 153,000
Total Cost Budget	\$3,652,190

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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

Response: [please use as much space as needed]

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

- The Department of Human Services (DHS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support. DHS transmits a file to the State Agency (SA) which contains the SNAP Direct Certification students. The age range of

the data for SNAP is age 2-20. The file is merged with the students currently enrolled in school. If a student is not enrolled in school then their information is not transmitted to DHS for a PEBT card. Only students matched with the HIDOE SIS are in the file.

- (HIDOE) is responsible for eligibility determination through this direct certification process, the NSLP application process, identification of NSLP participating schools, and the monitoring and collecting of student learning mode classifications.

To identify eligible school children and confirm their eligibility, DHS will use data provided by HIDOE. HIDOE will instruct schools to provide a list of all students eligible for free or reduced-price meals. This list will be developed using the SY 20-21 list of free and reduced-price eligible students as its base. HIDOE will ensure that any students who have graduated or moved out of district are expunged from this list and add students newly eligible by way of direct certification (SNAP recipients), other categorical eligibility sources or via the SY20-21 NSLP-approved household applications (non-SNAP recipients). Hawaii will only issue benefits to students who qualify for Free/Reduced benefits and all students who attend CEP schools that participate in the Richard B. Russell National School Lunch Program. The State Agency required SFAs to continue to collect and process Free/Reduced meal applications even though most SFAs switched to SSO or SFSP in mid-October. SFAs were also required to conduct verification as the State Agency recognized that schools may return to NSLP at some time during the current school year. A uniform process based on a simplifying assumption will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school.

The HIDOE computer system is very antiquated, it is virtually impossible to track a student's learning mode electronically. Manual tracking of the 97,000+ students who qualify for Free/Reduced would be the only available method. Under normal circumstances this would be an unimaginable task; however, it becomes even more unfeasible in-light of the State of Hawaii's fiscal constraints where imposition of furloughs and layoffs of HIDOE staff remains a strong consideration. DHS staff are also subject to those same furlough and layoff plans. These unfortunate circumstances add additional challenges to Hawaii's ability to provide these much needed PEBT benefits to our students and their families. Hawaii has one of the highest levels of unemployment with the tourist industry virtually shut down. It is critical that DHS deliver the PEBT benefits in a timely fashion.

The State plans to utilize these simplifying assumptions with each school. Each school will be required to declare in writing on the first school day of each month what mode of learning is being implemented (e.g. distance/remote; fully in-person; or hybrid of the previous two modes). That mode will be utilized to determine whether the students attending said school qualify for PEBT benefits or not. If the school should close for COVID-related reasons, the school will notify HIDOE who will in turn notify DHS. DHS will make the appropriate changes in benefits for the children.

Charter Schools follow the HIDOE scheduling because they are part of HIDOE like the public schools. We do not have any other types of schools that participate in the NSLP. We were notified that HIDOE will be recommending students return during the fourth quarter in a hybrid model.

A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level.

Schools will indicate their learning model on a monthly basis. The payments will be based on the predominate model. If more than 75% of the students are distance learning then the students at that school will qualify for the full month's benefits. As noted in the plan we have in place that a school must notify HDOE within 48 hours if there is a change in learning model and DHS must be notified within 24 hours. A change in PEBT payment will be made if the learning model is changed.

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]

All HIDOE students qualify for PEBT benefits because the start of school was delayed for ten days. The state plans to issue P-EBT retroactively for the months of October 2020, November 2020, December 2020, January 2021, February 2021, and March 2021. During this time period all HIDOE schools utilized the distance learning model per the HIDOE data representatives. Starting March 2021, DHS will receive information on the learning mode of each individual school in the district to determine the benefit level at -monthly intervals. Should a school's mode of learning change it must notify HIDOE within 48 hours of the change who will in turn notify DHS within 24 hours. This will allow for school closures due to COVID.

The State plans to utilize these simplifying assumptions with each school. Each school will be required to declare in writing on the first school day of each month what mode of learning is being implemented (e.g. distance/remote; fully in-person; or hybrid of the previous two modes). That mode will be utilized to determine whether the students attending said school qualify for

PEBT benefits or not. If the school should close for COVID-related reasons, the school will notify HIDOE who will in turn notify DHS. DHS will make the appropriate changes in benefits for the children.

A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. Charter Schools follow the HIDOE scheduling because they are part of HIDOE like the public schools. We do not have any other types of schools that participate in the NSLP. We were notified that HIDOE will be recommending students return during the fourth quarter in a hybrid model.

Hawaii will also request that each qualified Charter School and private school report to DHS on a monthly basis the learning model used in the school. The same simplifying assumptions will apply to the Charter School as the Public Schools. The amount of payments will also be distributed in the same manner as the Public Schools.

Schools will indicate their learning model on a monthly basis. The payments will be based on the predominate model. If more than 75% of the students are distance learning then the students at that school will qualify for the full month's benefits. As noted in the plan we have in place that a school must notify HIDOE within 48 hours if there is a change in learning model and DHS must be notified within 24 hours. A change in PEBT payment will be made if the learning model is changed.

To reiterate, Hawaii will monitor the status of individual schools and students through HIDOE and DHS on a monthly basis. Any Charter schools whose students are eligible for PEBT benefits based on the above simplifying assumptions will also be required to notify DHS in the same manner within the same timeframes.

5. Benefit Levels

Standard for Benefit Levels

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

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

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

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

Response: [please use as much space as needed]

Students will be issued benefits equal to the federal reimbursement rate for a breakfast and a lunch for school year 2020-2021, as specified by USDA. The benefit is multiplied by the number of school days that the eligible child did not receive a free or reduced-price meal at the school due to the school's closure or reduced attendance or hours. In Hawaii the daily per-child benefit is \$7.97

The state intends to leverage additional simplifying assumptions to issue two benefit amounts, one amount for hybrid students and one amount for fully remote students. Since Hawaii is making payments retrospectively students will be eligible based on the number of school days in a month. A school utilizing the "distance/virtual" learning mode will translate to their student's eligibility for PEBT benefits at the full-time rate of \$143 for the month. A school utilizing the "hybrid" mode of learning will translate to their student's eligibility for PEBT benefits at the half-time rate of \$72 for the month. These simplifying assumptions are the most manageable for HDOE and DHS due to the technology and staffing challenges we face in the future.

HIDOE will make the determination of the predominant learning mode for each school based on their criteria and will make this available to DHS on a monthly interval. DHS will accept this confirmation as the predominant learning mode for students at the school and will issue the benefits based on this information. Unless advised later by HIDOE of the change of the predominant learning mode and therefore a need to adjust benefits amounts, benefits issued for the predominant learning mode for the month will be final.

Hawaii's school year was scheduled to start on August 4, 2020 and runs through May 27, 2021. Hawaii will utilize its current approved PEBT plan for the months of August and September 2020. For the balance of the current school year, the remaining Instructional Days are as follows:

<u>Month</u>	<u>Days of Instruction</u>
October	16
November	19
December	13
January	19
February	19
March	17
April	20
May	19
Grand Total Days	142

Average number of days = $142/8 = 18$ days

Full-time = $(18 \times 7.97) = \$143$

Half-time = $(9 \times 7.97) = \$72$

Should a school declare they will continue in a distance learning mode, their students will be eligible for 100% of the PEBT benefits for the month. For example, in March 2021, a child would be eligible for full-time rate of \$143 in PEBT benefits.

Should a school declare they are operating under a "Hybrid" system a child would be eligible for half the total number of days of instruction. For example, in March, school ABC declares they are practicing a "Hybrid" system the children at that school would be eligible for \$72 in PEBT benefits.

Should a school declare they will return to "Full time in person" the students at that school will not be eligible for any PEBT benefits.

DHS will receive information from HIDOE on the learning mode of each individual school in the district to determine the benefit level at monthly intervals.

As noted, the State Agency and DHS will continue to monitor and reassess the school plans for the remainder of the school year.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

Please also address each of the following:

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

Response: [please use as much space as needed]

Timeline:

Day(s)	Activities
0	USDA approves the State's plan
4	HIDOE provides student data for October through February to DHS
10	Public notice campaign begins
30	Issuance to new P-EBT accounts and cards mailed
45	Notices issued to SNAP and non-SNAP households
46	P-EBT hotline becomes active
50	Issuance to existing P-EBT accounts
51 - ongoing	Issuance to newly identified cases and any corrected payments.

Distribution of Benefits:

Benefits will be distributed on a unique P-EBT card regardless on whether the child is part of a SNAP household. A child that is reported to be in a SNAP household will be captured as a SNAP household for reporting purposes, however their P-EBT benefit will still be issued to a unique P-EBT card.

The rationale for this practice is due to lessons learned from previous P-EBT issuances where the living situation for the child was very fluid and their participation with one household changed frequently. By issuing out a unique P-EBT card, this allows for the benefits to follow the child regardless of their living situation.

If a child received their P-EBT benefit on their EBT card in the Spring their P-EBT benefits for the 2020 – 2021 school year will be issued on a unique P-EBT card.

If a child received their P-EBT benefit on a P-EBT card in the Spring/Fall, their P-EBT benefits for the 2020 – 2021 school year will be issued on their existing P-EBT card from the Spring/Fall.

Hawaii proposes to issue benefits retroactively by the 15th of each month or the next business day, the first benefit in this cycle would be April's benefit issued on May 17. Though it has been recommended to stagger these issuances, previous P-EBT issuances have not been staggered and had not proven to cause any concerns regarding adversely affecting the local food supply at retailers.

Hawaii further proposes to split the retroactive issuances of August and September 2020, October – December 2020, and January – March into 2 separate issuances. The first issuance will be during the first or second week of April, and the second issuance will be combined with the issuance for March's benefit.

EBT Benefit Type:

The benefits will be issued as a benefit type, PEBT. This is the same benefit type utilized for the previously approved P-EBT issuances.

Benefit Spend Priority:

P-EBT benefits will be issued to P-EBT cards for all students so there is no need for a spend priority

as the P-EBT benefits will not co-exist with SNAP benefits on a EBT card.

Expungements:

Expungements for both SNAP and non-SNAP households will occur 274 days from the date of issuance.

Returned Mail:

P-EBT cards that are returned in the mail will be handled as follows:

1. The EBT processor/FIS sends DHS a card status report with the card numbers for the returned cards marked as “undeliverable”
2. DHS will forward the report to eWorld Enterprise Solutions to pull the address information currently in record and create a worksheet of the student’s name, school and address information and will then return to DHS.
3. DHS will forward the worksheet to HDOE to research if an alternate address is available in the student’s records.
4. If an alternate address is available, the information will be provided to DHS and will then be forwarded to eWorld Enterprise Solutions to update the address information in the PEBT Administrative Portal (the PEBT payment management system) and upload the information to FIS to update the FIS information and reissue a replacement card to the corrected address.

Replacement Cards:

Hawaii anticipates that many households will require replacement P-EBT cards as some time has passed since the last card issuance. Hawaii will maintain the process that was in place during previous P-EBT cycles for replacement card issuances. Cardholders are mailed a notice prior to their P-EBT benefit issuance that instructs them to call the ebtEdge phone number (1-888-328-4292 and for TTY callers 877-447-5990) to request a replacement card. The DHS contracted call center will also direct cardholders to this line if they are seeking a replacement card.

In addition, the DHS website and the PEBT Public Portal websites will also contain the replacement card instructions.

7. Customer Service

Recommended Standard for Household Support

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

1. USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
 2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.
- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
 - Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
 - Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
 - Describe 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]

Issuance errors:

Individuals can reach out directly to the DHS contracted call center for disputes of their benefit amount or eligibility for P-EBT benefits. These disputes will be tracked through a tracking application (Service Now) and will be made accessible to DHS for review and further investigation if required. DHS will then coordinate with HIDOE to arrive to a conclusion regarding the issue causing the dispute. The household may be asked to provide additional verification if DHS is unable to determine if there was an issuance error (ex. verification of address of the student). Once any necessary information is provided and reviewed, DHS will reach out to the household to inform them of its final determination.

If it is found that the individual did not receive a benefit that he/she was entitled to, the call center representative will enter a corrected issuance to the individual in the PEBT Administrative Portal. If, after investigation, it is determined that the original benefit amount or denial of benefits was valid, the individual will be informed of the Department's decision.

As the call center services will require to be procured for and are contingent on the approved administrative funding through this plan, there is no call center number that can be provided at this time. Once the service is contracted, Hawaii will provide FNS the contact information that will be available to the public for P-EBT services.

Access Issues:

Since we are determining P-EBT eligibility via an automated data match process rather than via an application process, we do not anticipate a significant amount of access issues. DHS will work with the HIDOE homeless liaisons to coordinate connecting PEBT payments with homeless students being served by the liaisons. Families with limited English proficiency will be able to speak the DHS contracted call center representatives via an interpreter, and mailings will include instructions in multiple languages on contacting the call center for interpreter services. Households are not required to have internet access to receive these benefits as an application is not required. Individuals with disabilities will be served in the same way we currently serve SNAP participants that require additional assistance.

Public Information Campaign

The State will conduct a public information campaign to alert those receiving benefits of the purpose of P-EBT and how it is to be used. This will include posting on the DHS and HIDOE web sites, social media, robo-calls, press releases, possible announcement during the Governor's press conference, and notification to community partners.

Information to P-EBT participants

Both SNAP and Non-SNAP participants will receive a mailing with the following information

- A description of P-EBT
- Instructions for PINing the P-EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., only to purchase food 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 and the DHS website with frequently asked questions
- Phone number for the EBT processor for replacement card requests

8. Over-issuance of P-EBT benefits

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

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

Response: [please use as much space as needed]

Any potential benefit over-issuance that DHS learns of will be tracked on spreadsheet for investigation and resolution. DHS will investigate the over-issuance by checking the HIDOE file, checking the information in the PEBT Administrative Portal and requesting additional documentation from the household 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), a Service Now entry will be created to instruct the DHS contracted call center representative to enter the corrected issuance to the eligible household in the PEBT Administrative Portal. A Service Now entry will also be created to ensure that no additional benefits are issued to the ineligible household for future months. In no instances will DHS reclaim P-EBT benefits by reducing a household's SNAP benefit.

9. Benefit Issuance Reporting

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

10. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

11. Release of Information

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

12. Civil Rights Statement

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

13. Administration of State P-EBT Plan

Hawaii will administer P-EBT according to the terms of its approved State plan. If Hawaii 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.