

# Documenting P-EBT Implementation

## Texas Case Study

### Overview

The Pandemic EBT (P-EBT) program in Texas served over 2.8 million children by distributing more than \$816 million in nutrition aid in four months. Although Texas required families not already enrolled in the Supplemental Nutrition Assistance Program (SNAP) to apply for P-EBT, the state designed a simple application, conducted a robust outreach campaign, stood up a large new call center, and used enrollment metrics to monitor and target outreach in communities with eligible but unenrolled children. From early outcome data, the advance planning and resources that Texas invested in P-EBT resulted in successful implementation.

### State Context

The Texas Health and Human Services (HHS) served as the lead agency responsible for the implementation of P-EBT, working in close collaboration with the Texas Education Agency (TEA) and the Texas Department of Agriculture (TDA).<sup>1</sup> From the outset, P-EBT had the strong support of the Governor's office who asked the agencies to work together on a common, cross-agency mission. According to HHS, "Our guiding principle was to make the process seamless and least intrusive to residents." HHS provided daily briefings for key stakeholders, including anti-hunger advocates and grocery retailers.



"Texas is used to responding to disasters, but this was unprecedented and unique. We needed everyone working together."

– Senior HHS official

---

<sup>1</sup> The Texas Education Agency (TEA) is responsible for data collection for the National School Lunch Program (NSLP) in all public schools, while the Texas Department of Agriculture manages data collection for NSLP in private schools. TDA also oversees NSLP in all schools, along with most other child nutrition programs in the state.

## Implementation Overview

### Plan Approval from Food and Nutrition Services (FNS)

Once leadership in Texas decided to pursue P-EBT, it took several rounds of negotiation with the U.S. Department of Agriculture's Food and Nutrition Service (FNS) before the Texas plan was approved on May 8. FNS asked Texas to demonstrate how they would assure the validity of applications, as well as how they would handle the anticipated application volume in a state where 3.6 million children were eligible. HHS, TEA, and TDA all worked together to secure FNS approval. This was helped by the agencies' previous work together on data sharing for direct certification and Disaster SNAP, so the agencies already had memorandums of understanding in place.

### Plan Design

In Texas' approved P-EBT plan, the state anticipated serving over 3.6 million children overall, 40% of whom lived in SNAP households and 60% of whom lived in non-SNAP households. The maximum P-EBT benefit was calculated to be \$285 per child (\$5.70 per day x 50 days).<sup>2</sup> Texas anticipated issuing more than \$1 billion in P-EBT benefits to Texas' children.<sup>3</sup>

#### *Issuance Method*

Children enrolled in SNAP are directly certified for free and reduced-price (F/RP) school meals. The most expeditious way to get P-EBT to this cohort was to issue benefits directly to their families' existing EBT cards. Texas received approval from FNS to use the simplifying assumption that all children in SNAP households between age 5 and 18 were P-EBT eligible. This direct issuance process was limited to SNAP recipients between the ages of 5 and 18, as of March 2020. P-EBT benefits were issued to these children before the end of May. This phase reached more than 1.3 million children.

#### *Applications*

All other children receiving F/RP meals in Texas needed to submit an application to receive P-EBT benefits. This requirement extended to eligible SNAP recipients under 5 and over 18, as well as those who applied for SNAP after March 2020. The caregivers of an estimated 2.3 million Texas children needed to submit an application to receive P-EBT benefits. Applications were available

---

<sup>2</sup> FNS Approval of Texas State Plan, May 8, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/TX-SNAP-COV-PEBT-Approval%20Letter.pdf>

<sup>3</sup> Texas P-EBT landing page available at <https://hhs.texas.gov/services/health/coronavirus-covid-19/coronavirus-covid-19-information-texans/pandemic-ebt-p-ebt-due-covid-19>

online through the YourTexasBenefits.com platform, which also manages SNAP, TANF, and Medicaid applications. Advocates were pleased that the P-EBT application was user-friendly, available in English and Spanish, and did not require the creation of an online account, unlike SNAP, TANF, and Medicaid applications on the platform. In retrospect though, advocates said it might have been helpful to use an application platform that would not be easily confused with SNAP, along with a clearer indication to applicants that Social Security Numbers were optional.

The direct P-EBT application link was only available to eligible families who received the link from their school and was not posted publicly by Texas agencies or their community partners. Advocates pushed for the publication of the application link, but the agencies were concerned the application would be overwhelmed by families whose children were ineligible for P-EBT. Community partners, including Texas' food banks, did have access to the link for any families that contacted them and needed help accessing the application.

#### *Timeline*

After P-EBT benefits were directly issued to SNAP households, the application phase in Texas began. The P-EBT application period opened on June 1, 2020 and the state originally expected to keep it open for 30 days. Advocates and administrators all agreed this was not enough time to reach all eligible children, so the deadline was soon extended to July 31. After this 60-day application period, Texas estimated that between 600,000 and 800,000, or about one-third of those who needed to apply, had yet to apply for P-EBT. To ensure families had more time to apply, HHS extended the deadline once more to August 21, 2020. This extension proved to be critically important as an additional 60,000 children approved for P-EBT benefits from applications submitted between August 1 and August 21.



**"The extension of the P-EBT deadline helps ensure that Texans have time to apply for this program and provide nutritious food to their families as the state continues to combat COVID-19. Ensuring access to healthy food in our communities is an important part of our response to this pandemic."**

**– Texas Governor Greg Abbott**

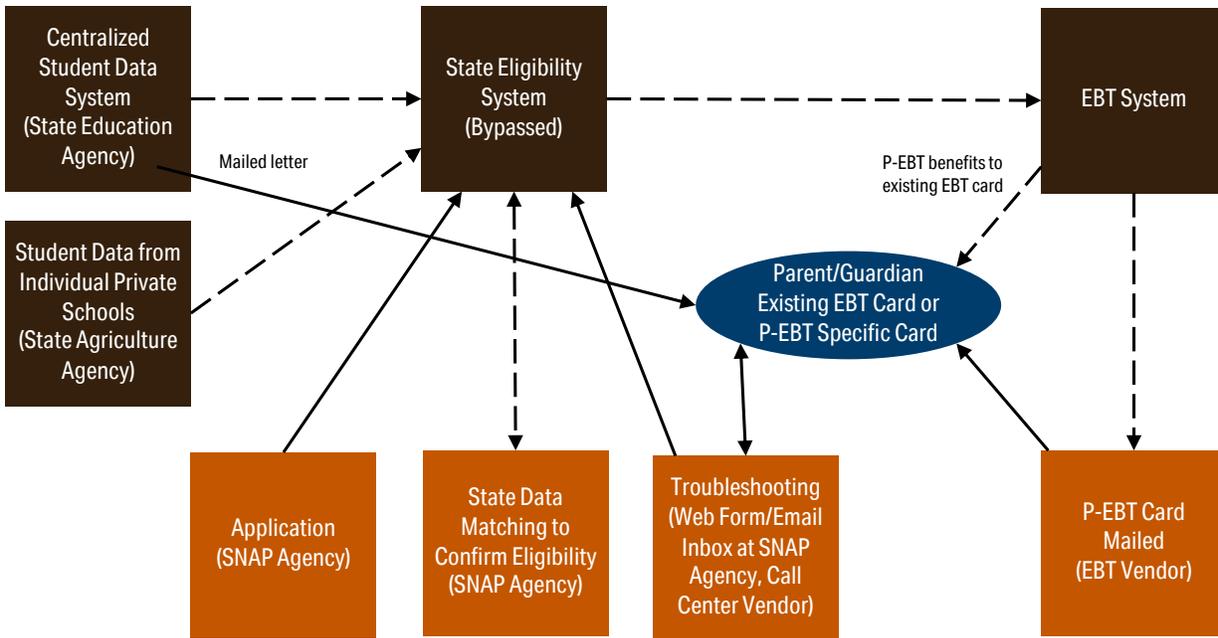


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Texas. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represent the customer and the output. The lines represent the flow of information and whether it was electronic or manual- the dotted lines represent only electronic data. The map does not attempt to estimate workload or level of complexity to implement each of these steps.

## Student Data

The TEA tracks F/RP meal application data for the National School Lunch Program (NSLP) in all public schools. Child data was stored by each food service division within each Education Regional Service Center (ESC). TEA needed to collect student data from all of the ESCs. For most schools, the ESCs had data that was updated in Spring 2020, but for some schools, the most recent data was from October 2019. This student data did contain addresses, but many were considered to be outdated. The Texas Department of Agriculture (TDA) maintained a separate database of children who attended private schools.

TEA and TDA reported various system and data constraints they had to overcome, which was time-consuming. This was especially true for self-reporting districts and private schools where data was not managed centrally.

In addition to the likelihood of outdated addresses, **the biggest driver of Texas' decision to utilize a P-EBT application was because parent/caregiver information was not available** from the student records maintained by TEA and TDA. Although HHS was aware that some other states were issuing P-EBT benefits

in the child's name, Texas chose to issue benefits to the head of household, which is their normal EBT issuance process for SNAP.

### **Newly Eligible Children**

Children who enrolled in SNAP or applied for F/RP meals through their school district after March 2020 were considered eligible for P-EBT if they submitted a P-EBT application. HHS did additional matches in May and July to ensure children enrolling after the pandemic began would be added to TEA and TDA's eligible student lists. As in other states, it is unclear how many families may have benefitted from this extension of eligibility. Advocates were not aware of any systematic messaging telling families that they could apply for F/RP meals after schools closed. However, new SNAP enrollees did receive messaging through their local school district encouraging them to apply for P-EBT to access additional food resources.

### **Confirming Eligibility**

To confirm the eligibility of all P-EBT applicants, HHS matched applications against student lists provided by TDA and TEA. The IT team at HHS, with support from their eligibility system contractor (Deloitte), developed a matching algorithm to achieve the highest possible number of matches to minimize the need for intervention from an HHS eligibility specialist. Children were matched on a combination of five data points, including First Name, Last Name, Date of Birth, School District and Address to validate eligibility. Data that did not match through this process was known as an exception. For exception cases, an HHS eligibility specialist called the households for clarification.

#### *Exceptions Process*

During the exception process for P-EBT applications, HHS faced nearly 400,000 exceptions that needed to be manually processed. A large team of 200-700 HHS employees were pulled in to work all exceptions over several weeks. During their busiest period in June, HHS was processing between 16,000 and 33,000 exceptions daily, with a peak day of 60,000 exceptions processed. HHS reported making various adjustments during this phase, including creating a tracking mechanism for the exceptions process.

Exceptions resulting from a P-EBT application that did not match student lists from TEA and TDA were reviewed daily so HHS employees would follow up with families and request additional information. Before clearing an exception, HHS would make two attempts to contact the households and compare application data to TEA and TDA's student lists to see if a match could be identified. At one point, HHS sent a mass email to 100,000 applicants in the exceptions queue

asking them to be prepared for a call from HHS so the agency could request additional information.

When a P-EBT applicant was determined to have already received the benefit, or no match could be found, HHS would issue a denial notice, which included language about the household's right to appeal.

## **Systems and Contracts**

Successfully executing Texas' P-EBT plan required significant technology investments. HHS' in-house IT team, along with the state's eligibility system contractor, played a significant role in implementation. The in-house team developed the P-EBT application on the YourTexasBenefits.com platform and made sure that the P-EBT application had separate servers to support it. HHS also made the conscious decision in April to stand up a separate call center for P-EBT with a vendor, understanding how high call volume was likely to be. That same month, HHS was seeing a 200% increase in SNAP applications, so the agency was cautious about adding any more stress that could crash that system.

All of the systems work described above required resources, so support from the Governor's office from the outset was critically important to the implementing agencies. HHS reported doing the work upfront to ensure they identified funds to cover all of the anticipated costs. The federal and state emergency declarations provided some flexibility to secure necessary contracts quickly.

## **Troubleshooting**

As noted above, HHS contracted with a vendor (Maximus) to launch a call center for P-EBT with a separate 1-800 number. The call center was staffed by 300 agents who answered up to 20,000 calls per day during peak times, which included accepting P-EBT applications by phone.

HHS developed Frequently Asked Questions (FAQs) with support from advocates, which the training team used for call center employees. Call center agents did not have access to individual case files, so could not answer specific questions from callers about whether a P-EBT application was approved or when the P-EBT card would arrive by mail. These questions had to be referred to HHS employees who would then call the household back at a later time.

As referenced above, Texas created a resolution process for households whose P-EBT applications were denied. Through this process, the administering agencies identified a few school districts that inadvertently left some children off their enrollment list, or incorrectly marked children as not eligible. Daily calls with TEA and TDA and the rest of the project team were utilized to resolve issues like this.

### *Denials*

P-EBT applications were denied for one of three reasons: (1) the child already received P-EBT benefits, (2) the child was ineligible, or (3) the child's record was not found, meaning the case could not be resolved through the exceptions process. The most common reason for denial was "already received the benefit" because many SNAP households did not realize P-EBT benefits had been deposited on their EBT card in May.

HHS began sending denial notices in mid-July, once eligibility during the month of June could be determined. Families were given 15 days to submit their appeal, although HHS still worked appeal requests that came in after this deadline. Advocates appreciated HHS's intent of the appeals process which showed that the agency wanted to give eligible households every opportunity to access P-EBT benefits.

### **Outreach**

While HHS managed the eligibility and enrollment process for P-EBT, TEA and TDA were responsible for outreach and external communication. As noted above, the core strategy to reach eligible families was through the schools. **Every school district in Texas was required to communicate directly with eligible families to share the link to the P-EBT application.** Some schools were able to target this communication only to families receiving F/RP meals, while others communicated the message to all students in the district. TEA and TDA supported this targeted message with letters, brochures, social media posts, and robocalls. All three agencies engaged the media by issuing press releases, granting interviews and hosting Facebook Live conversations. All of this activity generated a surge of traffic to HHS's P-EBT website. Finally, TEA and TDA coordinated a third outreach push through Texas' 1,200 school districts in August as the 2020-2021 school year began.



"This is a huge state and we assumed there would be places that hadn't heard about P-EBT at all. That didn't happen. People everywhere applied for and got the benefit. The word got out."

– Anti-hunger advocate in Texas

Throughout the P-EBT application period, Texas' project team closely monitored application volumes and locations. Where the agencies identified zip codes with low application rates, they worked with advocacy groups and local legislators to create tailored messaging and outreach strategies. One example of this comes from late July, when Texas decided to extend the application deadline from July 31 to August 21.

Advocates encouraged TEA and TDA to modify their flyers and outreach materials to more explicitly address concerns from immigrant families about the public charge implications of P-EBT. The agencies took advocates' advice and helpful public charge language was prominent in outreach messaging through the end of the campaign.

Advocates complemented the state's efforts with their own outreach work. For example, advocates translated P-EBT materials into additional languages (Chinese and Vietnamese), sponsored Spanish language radio, TV, and Facebook ads, and did targeted outreach to the most vulnerable communities.

### **Outcomes to Date**

**Texas closely monitored key performance metrics throughout P-EBT implementation.** As of September 22 (after the end of the application period), Texas approved and issued new P-EBT cards to over 1.5 million children in over 885,000 households that applied. This represents about two-thirds of the eligible children who needed to apply because they were not in SNAP households. Combined with the P-EBT benefits issued to SNAP recipients, over 2.8 million children in more than 1.6 million households had been served by P-EBT, 78 percent of the state's original estimate of eligible children. As of September 22, 95% of P-EBT benefits the state issued had been redeemed at Texas retailers.

A review of zip code level data from HHS on where P-EBT applications were coming from suggests that no area of the state was left out of the state's broad-based communication efforts.<sup>4</sup> As of September 28, only 17 out of Texas' 254 counties had a P-EBT participation rate (which includes eligible children in both SNAP and non-SNAP households) below 50%, and 186 counties had participation rates of 70% or above. The lowest participation rates (2 counties between 17-30%) are small, rural counties where a small percentage of school children receive F/RP meals.

## **Lessons Learned**

HHS administrators reflected that Texas has a lot to be proud of with P-EBT implementation, starting with the sheer volume of children (over 2.8 million) that have been served and the grocery spending (\$777 million and counting) that P-EBT generated throughout the state.<sup>5</sup> Texas managed to execute this program, which involved managing millions of customer transactions, in a very short time frame in the midst of a national crisis with many competing priorities.

---

<sup>4</sup> Texas' P-EBT application data by ZIP code, as of August 28, 2020: <https://hhs.texas.gov/services/health/coronavirus-covid-19/coronavirus-covid-19-information-texans/pandemic-ebt-p-ebt-due-covid-19>

<sup>5</sup> As of September 22, 2020.

1. **The resource investments that Texas made in technology, customer service, partner engagement and outreach paid off.** HHS dedicated over 200 state employees to P-EBT implementation, in addition to vendor staff on the IT and call center teams. TEA and TDA also committed 5-6 full time staff to the project. All internal and external partners committed to daily calls to ensure alignment and continue momentum.
2. **Expanding the functionality of the P-EBT Call Center to handle case-specific inquiries would improve the customer experience.** The vendor-operated P-EBT call center could not support case-specific inquiries from families due to their limited access to the eligibility system, which frustrated some families. The call center could answer general questions about P-EBT and take applications, but they could not see the customer's account to report whether an application had been approved, or when a P-EBT card might arrive in the mail. HHS staff would later call the customer back with case-specific information in the eligibility system. Some families missed these return calls from HHS staff due to unrecognized phone numbers.
3. **Increased communication with SNAP recipients about P-EBT benefits could reduce customer confusion and the state's workload.** As in many other states, HHS did not mail notices to SNAP households explaining the P-EBT deposit on their EBT card. Families often confused P-EBT issuances with emergency SNAP allotments that were being deposited around the same time. Direct notices to SNAP households may have reduced calls to HHS and unnecessary applications from families.
4. **The application process was more burdensome to applicants and the state than Texas expected.** While the agencies are very proud of their work on P-EBT to reach a high percentage of eligible children, they recognize that the application process required significant time and resources. Should P-EBT continue, HHS expressed interest in finding a way to implement without an application. A direct issuance approach would likely reduce the burden on both administrators and taxpayers. Agency partners expressed interest in discussing whether NSLP participation data could be tracked differently in the future and include caregiver information.

## Appendix

More information on Texas' P-EBT program is available at

<https://www.cbpp.org/sites/default/files/atoms/files/9-14-20fa-stateprofile-tx.pdf>.

Additional materials including FNS letter of approval, screenshot of P-EBT application, FAQs, infographic, letter on P-EBT extension, and sample social media communications, can be found in the resource library available at <https://www.cbpp.org/pandemic-ebt-resource-library>.