

**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
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

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

*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:** Oklahoma

**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 2020-2021. 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- ***August 15, 2020 – May 30, 2021***
    - ***Oklahoma will be using the average date of August 15, 2020 as the first day of the 20-21 school year as a simplified assumption.***
    - ***For calculating purposes there are 180 days of instruction per school year.***
  - For children in child care- ***October 1, 2020 – May 30, 2021***
- b. Estimated monthly and total ***amount*** of P-EBT benefits the State will issue within this plan/amendment's date range.
  - ***For the 19-20 school year, SNAP households were 20.94% of the overall households that were issued PEBT benefits. Oklahoma will make the simplified assumption that the same 20.94% of PEBT households for the 20-21 school year will be SNAP households for the calculations below.***
  - ***As there currently is no data for the 20-21 school year as to the number/percentage of students that are attending school virtually, via hybrid model, or in person, the State of Oklahoma will make the simplified assumption that overall 50% of students are completely virtual, 30% of students are hybrid, and 20% of students are solely attending in person for the sake of estimating benefits (50/30/20). The plan can be amended once data have been received.***
  - ***For ease of determining estimated issuances for those students attending school via a hybrid learning model, the State will employ a simplified***

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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.

*assumption defining hybrid as a 3/2 model (3 days virtual instruction / 2 days in person instruction per week) as the standard. This results in a rate estimate that is 60% of that for a completely virtual student. The plan can be amended utilizing actual virtual attendance days for actual calculation once data has been received.*

- ⊖ *For ease of calculation of estimated benefits, the State will employ using the 180 instructional days per school year.*
- *There are a reported total of 404,223 students from public and non-public schools that are currently receiving NSLP. However, this number is unofficial. The official number for the 20-21 school year will not be available until the end of the school year in May 2021. The State will employ the simplified assumption of the unofficial number being accurate for the purpose of calculating the estimates below.*
- *Children will only receive any PEBT benefits for days that they received virtual instruction. No benefit will be issued for absent days.*
- Estimated amount issued to school children in SNAP households. *Using the number of students in SNAP households for virtual and hybrid learning models as listed in section 3(c) below, employing the simplified assumptions listed above, and using the month of service as defined in section 3(a) above, the estimated amount of benefits issued will be:*

Type	Rate	*180 instructional days per school year (per child)	*number of students	Totals
Virtual	\$6.82 Per day	1,228	42,322	<b>51,954,497</b>
Hybrid	\$6.82 *.60= \$4.09 Per day	734	25,393	<b>18,648,619</b>
<b>Totals</b>				<b>70,603,116</b>

- Estimated amount issued to school children in non-SNAP households *Using the number of students in non-SNAP households for each learning model as listed in section 3(c) below, employing the simplified assumptions listed above, and using the month of service as defined in section 3(a) above, the estimated amount of benefits issued will be:*

Type	Rate	*180 instructional days per school year (per child)	*number of students	Totals
<b>Virtual</b>	\$6.82 Per day	1,228	158,790	<b>194,994,120</b>
<b>Hybrid</b>	\$6.82 *.60= \$4.09 Per day	734	95,274	<b>69,931,116</b>
<b>Totals</b>				<b>264,925,236</b>

- Estimated amount issued to non-school children in child care. ***The State of Oklahoma will submit this plan in the coming weeks.***
  
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households ***Using the simplified assumptions listed above, the calculations for the numbers of school children in SNAP households are as follows:***

$$404,223 * .2094 = 84,644 \text{ students in SNAP households.}$$

$$84,644 * .50 = 42,322 \text{ virtual students}$$

$$84,644 * .30 = 25,393 \text{ hybrid students}$$

$$84,644 * .20 = 16,929 \text{ in person students}$$
  - Estimated number of school children in non-SNAP households ***Using the simplified assumptions listed above, the calculations for the numbers of school children in non-SNAP households are as follows:***

$$404,223 * .7906 = 319,579 \text{ students in non-SNAP households.}$$

$$319,579 * .50 = 159,790 \text{ virtual students}$$

$$319,579 * .30 = 95,873 \text{ hybrid students}$$

$$319,579 * .20 = 63,916 \text{ in person students}$$
  - Estimated number of non-school children in child care ***The State of Oklahoma will submit this plan in the coming weeks.***
  
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup> ***The full amount of administrative costs are not known at this time. Currently:***

***\*The cost associated with Conduent is budgeted at \$10M. This may change as DHS will be paying for each card this round and the processor will be responsible for handling all replacement card requests.***

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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.

*\*The contract associated with development of the RP is for \$310K. However, that is only for the actual development of the program. There are other costs related to this project.*

*\*The plan will be updated once all administrative costs are known to DHS and the administrative grant request is prepared for submission.*

- 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

*School children both SNAP/non-SNAP: The schools currently have access to the RP and have started validating the information. This will enable schools to submit the validated data to SDE so that they can send the data to DHS by July 14, 2021. DHS will then load the data file and send to Conduent and begin transmitting benefits by August 1, 2021. The final and FNS reviewed change order has already been sent to Conduent. The change order is attached to this plan for your convenience.*

*Oklahoma will stagger the issuances to differ from other dates that various benefits are being transmitted throughout the month.*

- *Children will only receive any PEBT benefits for days that they received virtual instruction. No benefit will be issued for absent days.*
- *An absence code of 0.0 means the child was present that day and an absence code of 0.5 means the child was either late to school or left early. In both of those situations, the child would receive a P-EBT benefit for that day, provided they met the other eligibility criteria. If the absence code was something other than 0.0 or 0.5 (i.e. the child was absent that day), then the child would not receive benefits for that day.*

*Children in child care: The State of Oklahoma will submit this plan in the coming weeks.*

#### 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. *The OSDE is providing each district a list of their NSLP students through the Reporting Platform (RP), the school will then go into the RP and validate the days that each student is eligible to received P-EBT benefits based on the requirements of PEBT. Basically, the school is validating the information that is in the RP based on how they coded a student's attendance each day in their student information system. The students in the data we provide will not include any 19-20 graduates and will only be enrolled children. An absence code of 0.0 means the child was present that day and an absence code of 0.5 means the child was either late to school or left early. In both of those situations, the child would receive a P-EBT benefit for that day, provided they met the other eligibility criteria. If the absence code was something other than 0.0 or 0.5 (i.e. the child was absent that day), then the child would not receive benefits for that day*

*\*\* The schools have been advised that if a student would like to complete an application for SY 20-21 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 19-20 and did not complete a F/R app for SY 20-21 the eligibility for SY 19-20 could be used for these benefits. This would not include seniors who graduated or no longer enrolled in the school in SY 19-20.*

*For private schools, DHS will request the information form the schools themselves. The accuracy of their eligibility determinations are accomplished through the normal Administrative Review Process. That information will then be sent to DHS systems personnel using a spreadsheet. Said submission will be similar to the Direct Certification process that they are currently using.*

- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? *The schools currently submit that information to the SDE on*

*a regular basis as they determine the students F&R status at the school district. The OSDE only has the F&R data for public school children. OSDE will not be able to determine which students are SNAP recipients or non-SNAP recipients, DHS will have to determine that. If a child becomes eligible in the middle of the year and they are not a DC student, an application would have had to be completed to determine the F & R status. However, schools have been advised that if a student would like to complete an application for SY 20-21 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 19-20 and did not complete a F/R app for SY 20-21 the eligibility for SY 19-20 could be used for these benefits. This would not include seniors who graduated or no longer enrolled in the school in SY 19-20.*

*Non-public schools will continue to rely on the schools themselves to make the eligibility determination.*

*DHS will be responsible for determining whether or not a student is a SNAP recipient or not by comparing data.*

- 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. *For OSDE, if a child becomes eligible in the middle of the year and they are not a DC student, an application will need to be completed to determine eligibility for the National School Lunch Program (NSLP). This would also hold true if a child transfers schools or is a new student attending a specific school in the middle of the school year. The process would be the same for students attending non-public schools. However, schools have been advised that if a student would like to complete an application for SY 20-21 they still can and if deemed F or R based on that application they would be eligible for P-EBT. Schools were also informed that if a student was eligible in SY 19-20 and did not complete a F/R app for SY 20-21 the eligibility for SY 19-20 could be used for these benefits. This would not include seniors who graduated or no longer enrolled in the school in SY 19-20.*
- 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. *The district will determine this based on the requirements of P-EBT, the attendance of the students in their district and whether the school was providing meals during this timeframe. This would be the case for all students in the NSLP program, Provision 2 or 3 schools, CEP and non-public schools. An absence code of 0.0 means the child was present that day and an absence code of 0.5 means the child was either late to school or left early. In both of those situations, the child would receive a P-EBT benefit for that day, provided they met the other eligibility criteria. If the absence code was something other than 0.0 or 0.5 (i.e. the child was absent that day), then the child would not receive benefits for that day*

- 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.).  
*The district/school will establish this based on how their school was operating due to COVID at the local level of each school. Both public and non-public schools will be submitting their information by month to DHS for issuance of benefits. Any changes for students that were eligible, yet not included on the file transferred to DHS can be added to the next month's data so that all eligible students receive the benefits that they are entitled to.*
- 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). *OSDE is taking the eligibility that the school has confirmed based on the students F & R status in SY 19-20 or 20-21, DC status, districts Provision 2/3 or CEP status.*

*DHS is responsible for the eligibility that the non-public school has confirmed based on the students F&R status in SY 19-20 or 20-21.*

*DHS is also responsible for benefit delivery and transfer of issuance file to Conduent for transmission of benefits to EBT card. Conduent is going to be responsible for issuing initial and replacement cards to students.*

- 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. *For ease in issuing benefits uniformly, the State will employ the simplified assumption of August 15, 2020 as being the first day of the 20-21 school year.*

*When estimating the monthly and total of benefits that the State will issue:*

*\*\* During the 19-20 PEBT issuance SNAP recipients were 20.94% of the overall students that were issued PEBT benefits. The State will employ the simplified assumption that the same 20.94% of PEBT recipients for the 20-21 school year will be SNAP recipients for the calculation estimates. The plan can be amended once data have been received.*

*\*\* As the State does not have any current data for the 20-21 school year, as to the number/percentage of students that are attending school virtually, via hybrid model, or in person, the State will employ the simplified assumption that overall, 50% of students are receiving virtual instruction, 30% of students fall under a hybrid model, and 20% of students are attending completely in person (50/30/20) in order to estimate benefit levels. The plan can be amended once data have been received.*

*\*\* The State will base calculations on 180 instructional day per school year.*

## 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. *Each school will report this in the Reporting Platform (RP) that was developed for purpose of these benefits. The reason for this is every district operated differently during the school year based on COVID in their area. The RP can take into account the multiple instruction modalities that the schools have been using at various times throughout each month to capture the actual attendance of an eligible student. Non-public school will report very much the same way via the spreadsheet that is submitted. The school will be validating the information that is in the RP based on how they coded a student's attendance each day in their student information system. The prior school year data (2019/2020) will only be used to fill in missing NSLP enrollment when the current NSLP data is not supplied or missing due to not being collected since many schools are running a summer food program. When there is no NSLP application for a student SDE will direct parents and guardians to fill out and submit NSLP free and reduced lunch application.*

*\*\*SDE will also make an effort to provide current foster information, where flagged, as those children have a tendency to move and often have guardianship changes. Foster children in 20/21 will have a new PEBC "T" case created "per child" and issued through the mail to the address reported.*

*\*\* Newly eligible school children will be set up and paid from the beginning of the school year August 2020 to the latest month available for payment in the issuance process.*

*\*\* Newly eligible school children for the 20/21 school year will be monitored for by SDE through September 15, 2021.*

- 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? *The school will determine this based on what took place in their district and report this information in the RP. Non-public schools data to DHS will report each schools*

*operating status via the spreadsheet submitted to DHS Systems staff. An absence code of 0.0 means the child was present that day and an absence code of 0.5 means the child was either late to school or left early. In both of those situations, the child would receive a P-EBT benefit for that day, provided they met the other eligibility criteria. If the absence code was something other than 0.0 or 0.5 (i.e. the child was absent that day), then the child would not receive benefits for that day*

- 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.) *Since this plan is so late, schools will end up doing this all at the same time, but reporting it monthly into the RP. This will be the same process used by non-public schools. Minimal reporting will be done monthly, however due to the short time frame for issuing benefits, schools/districts will be submitting reports more frequently than required for each month since the school year began August 15, 2020.*
- 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. *The schools will determine this based on the days that the school had to be closed, had reduced attendance or reduced hours due to COVID this will be what they are entering into the RP.*

*Non-public will follow the same method of determination to be submitted via the spreadsheet.*

*Benefits will be issued retrospectively and the benefit amount will be for the actual number of days attended virtually for accurate rate of benefit delivery. \* By utilizing the actual number of virtual days to calculate monthly benefit, there is not a need to calculate a separate hybrid benefit rate for actual issuance.*

- 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. *The State does not have any simplifying assumption that would be applicable to this section of the plan.*

## 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 attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard. ***The State will be submitting this plan in the coming weeks.***
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements? ***The State will be submitting this plan in the coming weeks.***
- 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? ***The State will be submitting this plan in the coming weeks.***
- 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? ***N/A***
- 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.) ***The State will be submitting this plan in the coming weeks.***
- 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). ***The State will be submitting this plan in the coming weeks.***
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

## 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.

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

- *DHS will issue benefits based upon the actual days each month that each student attends school virtually at the rate of \$6.82 per day. This will ensure program integrity and accuracy of amount of benefits issued, thus reducing the instances of over issuance and/or fraud. Holidays and other days in which there is no school instruction will not be counted as eligible days. An absence code of 0.0 means the child was present that day and an absence code of 0.5 means the child was either late to school or left early. In both of those situations, the child would receive a P-EBT benefit for that day, provided they met the other eligibility criteria. If the absence code was something other than 0.0 or 0.5 (i.e. the child was absent that day), then the child would not receive benefits for that day.*

## 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 RP will be completed sometime in May 2021. Training will have to be arranged for the schools by SDE which will be done as soon as we have the RP demo to them. There currently is not a "go live" date for the RP. The plan can be amended once the "go live" date has been determined. However, the State believes that the RP should be ready to be in full production sometime in May.*

*\*\* 0-30 days post launch- data for prior months should start being received by the State. Once a full month of information is received, within 7 business days, the State shall send a file for benefit transmission to processing vendor Conduent to issue the benefits.*

*\*Public media campaign will launch during this time as well.*

*\*\*Subsequent month's issuances will be sent to Conduent within 7 business days of State receiving the information files from OSDE and the non-public schools. Due to the limited amount of time that the state has to issue the benefits, there will not be a formal dated timeline as to when benefits will be issued. The State will issue benefits as soon as the validated monthly information from the schools is received. The State will issue benefits in corresponding installments by month, over time.*

- 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? *Yes, the State will issue PEBT benefits on a unique card design.* If so, who will receive these cards, non-SNAP households only? Or also SNAP households?

*\*In the initial round of PEBT (Mar. through May 2020), non- SNAP households were issued unique PEBT cards and instructed not to destroy them as they will be used for SY20-21 benefits. However SNAP households received their benefits on their existing EBT card.*

*\*All recipients will be issued a new PEBT card per individual. If there is more than 1 child in a household, then each child in that household will receive a card.*

- 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. ***PEBT benefits will be distinguished from SNAP and D-SNAP benefits with the use of a sub-benefit type code “LC” in the eligibility system.***

- 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. ***PEBT benefits will have priority and spent first before SNAP and D-SNAP.***
- 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. ***Oklahoma will follow the same expungement plan as the SNAP program. All PEBT expungements will be set to 274 days.***
- 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? ***The State will use the latest information provided to the local schools by parents/guardians of the child(ren). If a child does not receive a card, they can submit a ticket via the best survey that has been created to report issuance issues to DHS. The family can then order a replacement card via Conduent.***
- 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? ***SNAP and non-SNAP households will be issued unique PEBT cards for the issuance requested in this plan.*** If not, how will you handle cases where the P-EBT household no longer has their P-EBT card? ***All recipients for the 20/21 school year will receive a new unique PEBT card.***

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

## 8. Customer Service

### *Recommended Standard for Household Support*

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

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

- 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. ***Eligibility questions as well as the benefit amounts (based on the number of virtual instruction days per month) will be addressed by the local school districts. Card issuance and benefits transmission issues will be handled by DHS. There will be an e-mailbox ([PEBT@okdhs.org](mailto:PEBT@okdhs.org)) set up for schools to contact DHS if they are showing that they have the correct data for a child entered into the RP and that the benefits were not issued. Said e-mailbox will be***

*monitored by the DHS SNAP unit at State Office. The same process will be in place for non-public school staff as well. Any public inquiries that reach National Office can be forwarded to the same email address. In addition, DHS is setting up a BEST survey for families to access/respond to in regard to address changes and/or benefit transmission issues.*

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, and children with limited English proficiency, households without internet access, and people living with disabilities. *Every public school student in the state is issued an identification number upon entering the OSDE system that follows them throughout their entire scholastic career. This unique identifier is known to families of the public school system as it is the identifier used to enroll the student in school each year as well as used for school lunch payments/tracking. This unique identification number will compensate for children without social security numbers, foster children and homeless children.*

*Non-public schools are assigning the same type of unique identifier to their PEBT eligible students. This assigned identifier will be using a different range of numbers than OSDE to avoid any duplication in numbers.*

*There is not an application process required by the state in order to receive PEBT benefits. The State will be issuing benefits and PEBT cards based on the information that is provided to DHS systems personnel by OSDE and the DHS unit responsible for non-public schools. There will be contact information included in the media campaign that will inform students and their families as to how and who to contact with possible issues related to the PEBT program.*

- 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). *Oklahoma will conduct a public information campaign with a media release as well as social media release alerting Oklahoman's about the PEBT program details as well as how the benefits can be used. DHS will send out a letter to households receiving PEBT that:*

- \* *Describes the program*
- \* *Explanation of how and where benefits can/cannot be used*
- \* *Explanations of violations and penalties (such as trafficking)*
- \* *Notification that benefits are non-transferable*
- \* *Information regarding a hotline, help desk, or website/portal that participants can reach out to, if they have questions and/or need assistance. Including when to contact their school and when to reach out to DHS*
- \* *In addition, a buck slip will be inserted with PEBT cards that contains information about how to pin the card, what to do if the household does not want the benefit and a nondiscrimination statement.*

- 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. *Oklahoma will include a buck slip with the PEBT card that contains information about the program, including what to do if a household does not want the PEBT benefit that they have been issued.*

- 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)

*Oklahoma will include a buck slip with the P-EBT card with information about the program, how to activate the card as well as how the P-EBT card can be used. It will also inform how long benefits will remain on the card. The buck slip has one side English and the other Spanish. There are also two phone numbers on the buck slip with one to report problems with the card and one for contacting Oklahoma Human Services regarding problems associated with issuance itself or to decline the benefits. A letter has been developed and will be mailed to all P-EBT households identified that explains relevant program information to potential or actual P-EBT households. The State will develop a process for corrections regarding eligible P-EBT households who were not included in data match for P-EBT eligibility.*

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households? ***Please see above response.***
  - 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. *Oklahoma will utilize the use of both buck slips and a letter that will be mailed to both SNAP and non-SNAP households, that are PEBT eligible, with relevant information about the program,*
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means? ***The State intends on providing information on social media platforms as a part of their public information campaign.***

## 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 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]

*In coordination with the Oklahoma State Department of Education the Oklahoma Human Service Benefit Integrity and Recovery team will review all referrals of potential overpayments for validity. If an over-issuance can be proven, Benefit Integrity will issue notices and begin collection efforts against the payee recipient of the PEbt benefit. This data will be coded and stored separately from SNAP benefits. This separation of data will meet the requirement that SNAP benefits not be reduced for this debt; even in the case of an individual who has both a SNAP claim and a PEbt claim. If the PEbt benefit remains unused or the card is never activated the PEbt benefit will be recouped from the EBT card to resolve the overpayment. If the over-issuance is disputed, the Agency will follow our Fair Hearing Appeal process. OSDE would cooperate with DHS on the establishment of any overpayment.*

## **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. ***The State agrees to comply with the above 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. *DHS is in the process of collecting data to be included in a budget plan for administrative funding grant. This plan can be amended once that data collection is complete and State administrative costs have been confirmed.*

## **12. Release of Information**

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

## **13. Civil Rights Statement**

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

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

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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



Signature

Print Name and Title

Joy Hofmeister, State Superintendent of Public Instruction



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Signature

Print Name and Title

Justin B. Brown, Director of Oklahoma Human Services

**Date of Request:** June 11, 2021