

# PANDEMIC-EBT PUERTO RICO STATE PLAN

Family Socioeconomic Development Administration
Department of the Family



"If you cannot feed a hundred people, then feed just one." –
Mother Teresa



# Puerto Rico State Plan for Pandemic EBT (P-EBT)

1. Type of Request: Initial

2. Primary Citation: Families First Coronavirus Response Act

# 3. Executive Summary:

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.

Estimated amount issued to school children in SNAP households.

Estimated amount issued to school children in non-SNAP households.

- d. Estimated total amount of administrative funds the state needs to complete the work described in this plan/amendment.
- e. Tentative P-EBT issuance schedule (the dates on which you issue P-EBT benefits).

School children in SNAP households

School children in non-SNAP households

#### **RESPONSE:**



This state plan will cover from August 17, 2020 until May 31st ,20211.

**ADSEF/FAM** commits to inform the USDA of any significant <u>increase</u> or <u>decrease</u> in the data points during the date range covered by this initial plan (or subsequent amendment).

P-EBT Monthly Benefits To be issued during the State Plan's Date Range for children in SNAP and Non-SNAP. These were calculated by establishing an average monthly issuance for both semesters. The December 2020 issuance represent the retroactive payment from August 17, 2020 to December 2020.

December 2020	• \$595.10 SNAP & Non-SNAP per student
January 2021	• \$119.02 SNAP & Non-SNAP per student
February 2021	• \$119.02 SNAP & Non-SNAP per student
March 2021	• \$119.02 SNAP & Non-SNAP per student
April 2021	• \$119.02 SNAP & Non-SNAP per student
May 2021	• \$119.02 SNAP & Non-SNAP per student

The total amount of P-EBT benefits the state will issue within this plan/amendment's date range:



 $<sup>^{\</sup>mathrm{1}}$  The date range could vary depending on the COVID-19 pandemic status.

Estimated amount issued to school children in SNAP and NON-SNAP households, and the total of public and private school children.

Age Range	Children receiving NAP	Children in Public Schools (b)	Children in Public schools NAP Households (c)	Children in Public/private Schools Non-NAP Households (d) (b-c) +d	Children in Private Schools (e)	Estimated Total Students P-EBT (b + e)
Less than 3 yrs	36,906	157			29	186
3-4	36,578	3,191			592	3,783
5-11	147,788	132,348			24576	156,924
12-17	131,798	138,384			25697	164,081
18+	21,907	1,439			267	1,706
Total	374,977	275,519	211,033	115,6472	51,161	326,680

The P-EBT benefits would be distributed on the following dates for NAP households' students, and Non-NAP household's once the plan is approved, and the funds are available for PR:

**School children in NAP households** - P-EBT benefits issuance for NAP households' children would start tentatively, on December 17<sup>th</sup>, 2020<sup>3</sup> through December 19<sup>th</sup>, 2020. The distribution would be as follows:

- 1. NAP households with social security last digits: 0,1, 2, and 3 P-EBT benefits' issuance would be tentatively, on December 17<sup>th</sup>, 2020. On this same date opens the online application process for Non-NAP and new applicants.
- 2. NAP households with social security's last digits: 4,5, and 6 P-EBT benefits' issuance would be tentatively, on December 18<sup>th</sup>, 2020.
- 3. NAP households with social security's last digits: 7,8 and 9 P-EBT benefits' issuance would be tentatively, on December 19<sup>th</sup>, 2020.

School children in Non-NAP households – P-EBT benefits issuance for Non-NAP households' children would start tentatively on December 29<sup>th</sup> 2020 through January 4th, 2020. Once they enter the information into the electronic application and is approved, the participant would receive a P-EBT card by mail, which would include deposit payments retroactive to August 17, 2020.



<sup>&</sup>lt;sup>2</sup> The amount includes 64,486 public schools non-NAP households and 51,161 students from private schools.

<sup>&</sup>lt;sup>3</sup> Pending to FNS' State plan approval date

#### P-EBT for Schools 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 the 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 FY 2020-21
  - c. enrolled in a Community Eligibility Provision school or school operating under Provisions 2 or 3, or
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-20 and the school district has not made a new school meal eligibility determination for the child in SY 2020-21.
- 2. The child does not receive free or reduced-price meals at the school because it 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 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 month.).
  - Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for conforming eligibility).

#### RESPONSE:

How PR will Identify Eligible School Children and Confirm their Eligibility for P-EBT. How the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students

The Governor of Puerto Rico, *Honorable Wanda Vazquez-Garced,* avowed in Executive order number: OE-2020-066, page 31; Section 7; numb 29<sup>4</sup>, that <u>ALL</u> schools in Puerto Rico, either public or private, will start this school semester 2020-21 virtually, until the Health Department can prove that the daily virus spread has diminished or became constant for 2 weeks. Therefore, every child enrolled in a public or private school, SNAP or Non-SNAP that receives the school breakfast or lunch program benefits at their school would automatically qualify for the P-EBT.

Notwithstanding, in order to verify that the applicant (child) is enrolled in a P-EBT qualifying school, the ADSEF/FAM has developed the following strategies to validate and follow up on a child's eligibility.

- 1. Establish a Memorandum of Understanding (MOU) between the PR Department of Education and the PR Department of the Family. The agreement would detail the mechanisms to obtain the eligible students' data which would include the <u>list of public-school students</u> that receive school breakfast/lunch benefits. The information would be updated monthly in case of any changes occur in the school enrollment like new students (such as kindergarteners, and transfer students), and children who become eligible during the school year. In addition, the PRDE will receive the lists of those private schools and institutions students which receive the school breakfast and lunch program. The schools will send the PRDE the lists, certified by their institution. This information would be verified by the ADSEF, using the data included within the online application uploaded in PR NAP-SIBIF system, which would need to be completed for every non-NAP child currently studying virtually. The data would be updated monthly, after the 2<sup>nd</sup> month issuance, to validate if the child continues to be enrolled in the school. This process would ensure the child's eligibility to receive the benefits.
- 2. **NAP household children** would be included in either the public or private schools' listings. These students would not have to apply for the benefits because their data matched a NAP household. ADSEF would pair the NAP system information with the school lists to verify if the children are still enrolled at the moment. This verification would be performed monthly, after the 2<sup>nd</sup> month benefits issuance.
- 3. **Non-NAP children** would have to fill out an online application (as described above in number 2). These students could be enrolled at a public or private school. However, the ADSEF/FAM does not have any information to validate the student's eligibility or basic information as social security, postal address, grade, among others. This online application would be available at the NAP SIBIF system. Once the application is completed the student would receive an email message notifying that the application has been received and that a decision would be sent as soon it is evaluated. This application would need to include information related to the school attended, age, grade, etc., The information would be verified with the qualifying schools' listings for eligibility.
- 4. **New Students** eligibility would follow same procedures of NAP or Non-NAP households' children. If the children information appears in the NAP-SAIC system ADSEF would verify their eligibility following the number 3 above, NAP household children. If the children belong to a Non-NAP household ADSEF would follow process number 4 (above).

The ADSEF/FAM would confirm each child's lack of access to meals at school by verifying the monthly data provided by the PR Department of Education, and the Private schools organization, as established in the



<sup>&</sup>lt;sup>4</sup> Copy included with the plan.

MOUs. These lists would include the schools' name and students' information, so ADSEF could match the data provided with the one in use. However, since **OE-2020-066** (Executive Order) established that <u>ALL</u> schools public or private in Puerto Rico will be providing this semester's school year virtually, the ADSEF would be monitoring changes to the Executive orders extensions.

The process described above, would apply to <u>ALL</u> students from **NAP and Non-NAP Households**, **public** and **private schools' students**.

The Puerto Rico Department of Education serves as the State/Local agency (at the same time) for education purposes. Therefore, every public or private school has to comply with the Governor's Executive Order OE-2020-066 which establishes that every school will provide virtual education until the Health Department can certify a decrease in COVID-19 cases and/or a halt on virus spread. Hence, the ADSEF/FAM would be monitoring the number of cases monthly, in coordination with the Department of Education, as well as any changes in the next Executive Order. If there is any improvement and by means of an executive order's amendment, it is established that the schools can re-open, every child from a NAP or Non-NAP household, public or private schools would have to return in person to the school. ADSEF/FAM in coordination with the Department of Education and other private institutions would update every child's in person schedule. Also, ADSEF/FAM would immediately inform FNS of the changes, in order to stop de P-EBT issuance. Nonetheless, if the COVID-19 cases in Puerto Rico continue escalating the ADSEF/FAM would keep updating the students' eligibility by monitoring and verifying the monthly data provided by the Department of Education. This process would bestow ADSEF/FAM the necessary data to update each child's virtual schedule. As mentioned previously in this state plan, ADSEF/FAM would update the P-EBT information monthly until the end of the project.

The Description of the roles and responsibilities of each PR agency or other partners involved in P-EBT (e.g., which agency is responsible for conforming eligibility)

The Department of the Family through the Administration for the Families' Socio-economic Development (ADSEF, Spanish acronym) has drafted an MOU with the Department of Education to work with children's eligibility in public and private schools island wide. The following are the responsibilities for each agency:

1. Puerto Rico Department of Education (PR-DOE)

The PR-DOE is the state education agency responsible of managing state-operated schools in Puerto Rico as well as its education system and curricula. It is the largest agency of the executive branch of Puerto Rico. The PR-DOE serves as the **State Education Agency** (SEA) and **Local Education Agency** (LEA). This means that the agency's central headquarters operates as the state-level government organization responsible for education, including providing information, resources, and technical assistance on educational matters to schools and residents. On the other hand, as LEA serves as the public authority legally constituted within PR as the administrative agency for the public elementary and secondary schools. Therefore, as SEA and LEA, the Secretary of the PR-DOE has the seminal authority to instruct to all public schools, island wide the protocols to follow in case of an emergency or in this case, a pandemic like COVID-19. In regard to the P-EBT the PR-DOE would:



Provide updated lists of every student register in a public school, which benefits from the School Lunch Program. The list would include: Full Name, school, age, social security, address, email, and grade. The Department of Education will be using eligibility data from SY 2020-21.



Provide monthly updates of the status of every student included in the original list.



Will verify that only NSLP-participating private schools are part of the Private Schools MOU with ADSEF.





Will receive the list of validated private schools weekly and send to ADSEF to update the website for the P-EBT application



Inform ADSEF of any changes within the semester/school year that would affect the current status of virtual/distance learning.

2. Puerto Rico Administration for Family' Socio-Economic Development/DF (ADSEF) would be the conforming agency. In addition, would perform the following roles and responsibilities:



Develop P-EBT application form for Non-NAP and private school's children and upload to the NAP-SIBIF system. The application would be available once the State Plan is approved, through the following link: https://servicios.adsef.pr.gov/sibif/sibfam.aspx



Develop outreach and educational campaign on P-EBT benefits



Match the lists of public school's children receiving lunch benefits provided by the PR-DOE, with ADSEF's NAP recipients to identify children in NAP households.



Identify within the lists provided by the PR-DOE, Non-NAP children in a public school, eligible for school breakfast/lunch benefits



Identify within the lists provided by the PR-DOE, Non-NAP children in a private school eligible for school breakfast /lunch benefits



Match, NAP children within the private schools' lists eligible for school breakfast/lunch benefits



Coordinate P-EBT benefits issuance for NAP, Non-NAP, public and private schools' children with EVERTEC. (Company that issues NAP benefits).



Create a division for P-EBT within the Child Protection-ADFAN's call center to specifically attend doubts/questions or request help to complete the online application. This division would include 10 operators assigned only to P-EBT.



Monitor in collaboration with the PR-DOE, the children's P-EBT monthly participation



Prepare monthly issuance reports for FNS, and any other federal report required

To prevent duplicity of P-EBT benefits, PR will use the social security number (when available) to pair students with their benefits. In case that there is no social security number, the system will assign the student a temporary identification number. However, since this is not a unique number and anyone could enter the system and file again, ADSEF will pair the Non-SS application by verifying the parent/guardian's name, the student's name, and the school. This information will be verified with the PR-DOE's lists provided.



#### **B. Schools 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 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, 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 reduce 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:**

How PR will identify, confirm, and monitor the status of individual schools. How PR will identify the period of duration of the closure, reduced hours, or reduce attendance of the State's schools.

As described previously, the Governor of Puerto Rico, Honorable Wanda Vazquez-Garced, avowed in Executive order number: OE-2020-066, page 31; Section 7; numb 29, that <u>ALL</u> schools in Puerto Rico, either public or private, will start this school semester 2020-21 virtually, and will continue until the Health Department can prove that the daily virus spread has diminished or became constant for at least 2 weeks. Therefore, since PR-DOE is the SEA and LEA, the secretary of the PR-DOE will have to abide by the Health secretary's decision to remain closed/virtually operating until it can be proved that is safe to re-open the public schools. Regarding the private schools, they would also have to comply with the executive order OE-2020-066, which establishes that the schools will remain closed until the Health secretary can certify that the virus spread situation has improved.

The closure period has been determined by the Governor's executive order number: OE-2020-066. As previously mentioned, unless there is a constant reduction in COVID-19 cases, the classes at public and private schools will continue to be virtual until May 2021.

ADSEF/FAM aims to obtain the information from the Department of Education as it would be established in the MOU between the PR-DOE and ADSEF on a monthly basis. The ADSEF would not contact the public schools directly. However, while this agreement would also include eligible private schools' children information, ADSEF would follow up with the Private Schools organization to verify that all students are included.

Puerto Rico'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. ADSEF aims to monitor eligible schools' status monthly for any changes that could affect <u>ALL</u> public and private schools in Puerto Rico through the Department of Education. However, no school, public or private is authorized to open unless there is a change in the executive order instructing the whole educational system's reopening. Notwithstanding, any changes that might befall related to students' school enrollment reduction during the time receiving P-EBT benefits, would be notified to the PR-DOE by the school affected, immediately, as established in the one-page agreement<sup>5</sup> that would be signed by all schools. This has been stipulated in the MOU established between the ADSEF/FAM and PR-DOE. If any changes are notified by PR-DOE, ADSEF/FAM would report and forward the data to EVERTEC for the immediate cancelation of the P-EBT benefits. Monthly, ADSEF/FAM would match the PR-DOE data provided with the agency's data provided by EVERTEC<sup>6</sup>

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.

Puerto Rico does not propose any simplifying assumptions for this state plan.

<sup>&</sup>lt;sup>5</sup> Every public and private school would sign an agreement with the PR-DOE, which would require them to notify the PR-DOE of any changes in the students' school enrollment that would affect the P-EBT participation. This is established in the MOU between the ADSEF/FAM and PR-DOE.

<sup>&</sup>lt;sup>6</sup> EVERTEC will submit ADSEF, monthly printouts of the P-EBT issuances.



# 5. Benefit Levels

# Standard for Benefit Levels

The full daily benefit level for each eligible child is equal to the free reimbursement for breakfast and lunch for school year 2020-21. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

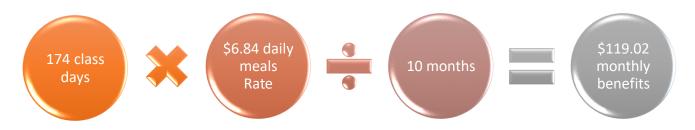
SY 2020-2021		Free Reimbursements USDA School Meal Programs			
July 1, 2020 -June 30, 2020	Lunch	Breakfast	Daily Total		
Contiguous US	3.60	2.26	5.86		
Alaska	5.79	3.64	9.43		
Hawaii, Guam, VI, PR	4.20	2.64	6.84		

• Describe the benefit levels proposed, including how day 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:**

The following tables describe the benefit levels proposed. These have been estimated by adding the lunch benefits at \$4.20, plus the breakfast benefits at \$2.64, which **equals \$6.84 per student daily**. This total (\$6.84) was multiplied by the number of days in which the school has remain/would be closed, since the school semester began virtually, on August 17, 2020 and the result was divided by 10 months. The result equaled the constant monthly benefit amount for **ALL** qualifying children.



The table below, demonstrates how the days and the benefits were calculated monthly. establishes the students' P-EBT benefits if they were issued by the to be received monthly once the plan is approved. The second table, further down, determines the children's P-EBT benefits for each school semester. Puerto Rico has determined to issue a monthly average issuance of \$119.02 until May 2021. Puerto Rico is not proposing any simplifying assumptions at the moment.

NAD NON NAD

Month	School Days	Total/ daily	NAP Students	NON-NAP Students	P-EBT Benefits
August	11	\$6.84	211,033	115,647	\$ 75.24
September	20	\$6.84	211,033	115,647	\$ 136.80
October	22	\$6.84	211,033	115,647	\$ 150.48
November	14	\$6.84	211,033	115,647	\$ 95.76
December	15	\$6.84	211,033	115,647	\$ 102.60
	\$560.88				
		Second	Semester 20	20-21	
January	14	\$6.84	211,033	115,647	\$95.76
February	19	\$6.84	211,033	115,647	\$129.96
March	21	\$6.84	211,033	115,647	\$140.28
April	20	\$6.84	211,033	115,647	\$136.80
May	18	\$6.84	211,033	115,647	\$123.12
	\$629.28				

The benefits formula is the reimbursement rate for school breakfast plus lunch (\$6.84/student/day) for the total number of days Puerto Rico would be providing the P-EBT benefits. Using an Average Monthly issuance of \$119.02.

The total benefit suggested is **\$595.10** per student for the  $1^{st}$  semester. And **\$595.10** for the  $2^{nd}$  semester.



The chart below illustrates the monthly issuance for SY 2020-21 qualifying students (public and private schools, NAP and Non-NAP households). As mentioned above, December 2020 reflects a higher initial issuance because it includes a retroactive payment since August 17, 2020 that was the first day of classes, to December 2020. This first issuance's amount could change, depending on the date the funds are approved and made available for distribution by FNS. *Puerto Rico calculated a constant benefit amount for fully virtual children by taking the number of scheduled instructional days in the school calendar (a number that excludes school breaks and holidays) and dividing that by the number of months in the school year.* 

December 2020
\$595.10 SNAP & Non-SNAP per student
January 2021
\$119.02 SNAP & Non-SNAP per student
February 2021
\$119.02 SNAP & Non-SNAP per student
March 2021
\$119.02 SNAP & Non-SNAP per student
April 2021
\$119.02 SNAP & Non-SNAP per student
May 2021
\$119.02 SNAP & Non-SNAP per student

# Total benefits for the School Year 2020-21



# The eligibility days and issuance amount were originally determined as follows:

Month	School Days	Total Students	Cost per Student	P-EBT Benefits/ Month	Total Benefits
August	11	326,680	\$6.84/daily	\$ 75.24	\$24,579,403.20
September	20	326,680	\$6.84/daily	\$ 136.80	\$44,689,824.00
October	22	326,680	\$6.84/daily	\$ 150.48	\$49,158,806.40
November	14	326,680	\$6.84/daily	\$ 95.76	\$31,282,876.80
December	15	326,680	\$6.84/daily	\$102.60	\$33,517,368.00
Sub TOTAL 1st semester	82	326,680	\$6.84	\$560.88	\$183,228,278.4
January	14	326,680	\$6.84/daily	\$95.76	\$31,282,876.80
February	19	326,680	\$6.84/daily	\$129.96	\$42,455,332.80
March	21	326,680	\$6.84/daily	\$140.28	\$45,826,670.40
April	20	326,680	\$6.84/daily	\$136.80	\$44,689,824.00
May	18	326,680	\$6.84/daily	\$123.12	\$40,220,841.60
Sub TOTAL 2 <sup>nd</sup> Semester	92	326,680	\$6.84/daily	\$629.28	\$207,475,545.60
TOTAL	174	326,680	\$6.84/daily	\$1,190.16 (2 semesters)	\$390,703,824.00

- P-EBT children in NAP households' eligibility day will be determined by their social security's last digit.
   Each digit would be deposited on a specific day of the month. This method would apply for public and private school children (first and second school semester). This strategy has been discussed with the retail food businesses so it would not affect their food inventory would be distributed among several days to not affect the
- 2. Non-NAP children households' eligibility day will be determined (first semester) as soon as their application is entered into the system and is approved. The day would be sent on an ongoing basis. This would apply for private and public' school students. The second semester will be determined by the children's last digit of their social security (same as for NAP households), or their temporary assigned identification number.

# 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 rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP, households on Day #15 and to newly identified cases on Day #16 onward.
- Examples of other possible milestones include, but are not limited to:
  - State Education agency provides student data to NAP State agency (Day #5)
  - P-EBT hotline becomes active (Dav #9)
  - o Public notice campaign begins (Day #10) etc.

#### Please also address each of the following:

- Will the State issue P-EBT 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 NAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if the State did not do so in SY 2019-20. 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, NAP, and S-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?
  - o If so, who will receive these cards? Non-NAP households only? Or also NAP households?
  - o If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?





# P-EBT Implementation Milestones/Timeline for SY 2020-2021

MILESTONES	PROPOSED DATES	AGENCY RESPONSIBLE	NAP HOUSEHOLDS	NON-NAP HOUSEHOLDS
	DATES	RESPONSIBLE	поозепосоз	HOUSEHOLDS
PR State Plan Approval	Day 0	FNS		
Meet with EBT processor (EVERTEC) to establish the real dates to start the distribution of P- EBT benefits. (Since the calendar talks about Day 1,etc.)	Day 1	ADSEF/ EVERTEC		
Discuss final details for Programming EBT NAP system to include P-EBT account	Day 1	EVERTEC		
Meet with call center to finalize the logistics of calls and establish the official operation hours. The schedule has been previously determined to be between 8:00 AM and 10:00 PM. This could fluctuate depending on the calls' deeds.	Day 2	ADSEF/ TeleMedik		
Make final the IT system's changes. Implement SAIC and P-EBT issuance changes in accordance with the plan's approval date.	Day 1	ADSEF/ LEDUTECH		
Provide data, dashboard or reports on P-EBT issuance.	Upon Request	ADSEF/ LEDUTECH	X	Х
Implement final changes to SIBIF platform for new P-EBT applicants and non- NAP participants	Upon Request	ADSEF/ KPG		Х
Upload the application form to SIBIF online platform for Non-NAP households' students and new applicants.	Day 3	ADSEF/KPG		х
Launch outreach campaign through press conference, and social websites targeting communities and participants.	Day 2	ADSEF/Strategic Communications Management	X	Х
Opens application process for Non- NAP households' students and new applicants online.	Day 3	ADSEF/FAM		Х
Call center/hotline becomes active for the public.	Day 3	ADSEF/TeleMedi k		Х
Match PR-DOE Lists with NAP households' children data to identify their profiles in the system.	Day 4	ADSEF/ PR-DOE	Х	
Provide matched NAP children list/data to EBT processor (EVERTEC).	Day 4	ADSEF/ EVERTEC	Х	

Sort NAP household children's deposit by their last social security digits.	Day 5	EVERTEC	X	
Issue new cards for Non-NAP households' students and new applicants	Day 6	EVERTEC		X
Onsets the P-EBT deposit process for NAP households' children. Children would receive their P-EBT through the household NAP card.	Day 5	EVERTEC	Х	
New and Non-NAP household students applications processing. This would happen on a continuous basis and simultaneous to all P-EBT processes.	From Day 3 (ongoing process)	ADSEF		Х
Send qualified Non-NAP household children's approved applications to EVERTEC for benefits' deposit.	From Day 3	ADSEF		Х
Monitor data provided by PR-DOE and EVERTEC according to the terms of the approved State plan and in compliance with program's federal regulations.	Start out 2 <sup>nd</sup> month and then after, until project ending.	ADSEF/ J. Santana & Assoc	X	Х
Complete benefit issuance Report- 292 as well as other recurring NAP reporting (FNS 46, 388 and 778)	As required by FNS	ADSEF/ J. Santana & Assoc.	X	X
PR P-EBT program management	From Day 1 to the end of the project	ADSEF	Х	Х
Deadline for applying for P-EBT benefits SNAP households, Non- NAP Households, public, private or	May 31st 2021 <sup>7</sup>	ADSEF	Х	Х



# P-EBT Benefits' Online Applications

qualified institutions.

The application process for qualifying students in Non-NAP households and private schools or institutions will be through an online application.

To gain access to the application, the parents/guardian must enter through the following link: <a href="https://servicios.adsef.pr.gov/sibif/sibfam.aspx">https://servicios.adsef.pr.gov/sibif/sibfam.aspx</a>

The application will be activated online once the State Plan is approved by FNS.

The following screenshots were taken from the online application, and include the information that will be required to complete and process the application by the parent/guardian:

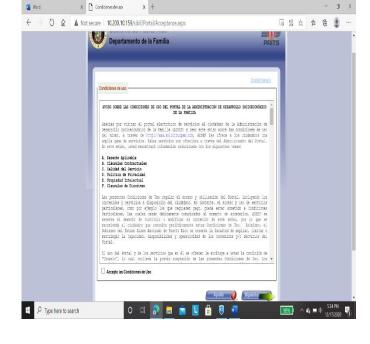
<sup>&</sup>lt;sup>7</sup> The student will have until May 31<sup>st</sup>, 2021, to request the P-EBT benefits. The amount will be retroactive to the first day of the SY 2020-21 (August 17, 2020). In case that a P-EBT qualified school receives new students after the SY 2020-21 has started, or during the 2<sup>nd</sup> semester, the benefits will be retroactive to the **first day in this new school** and **NOT** from August 17, 2020.

# 1st Screen



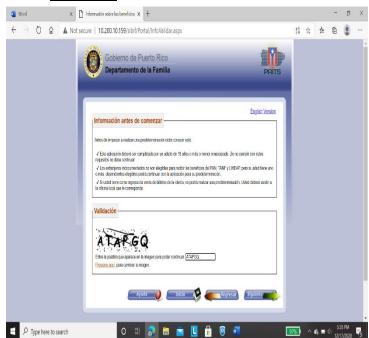
# 2<sup>nd</sup> Screen





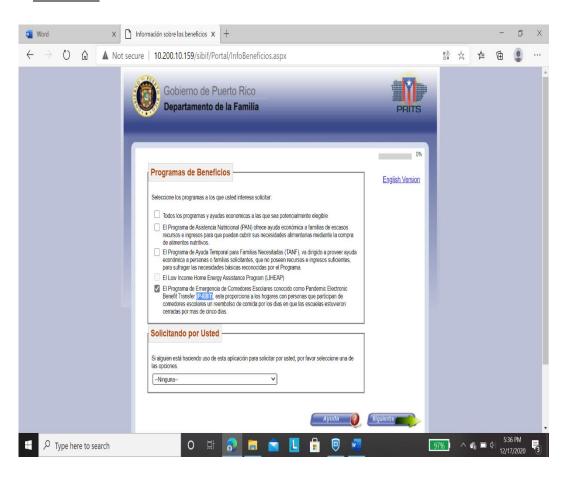
# 3rd Screen

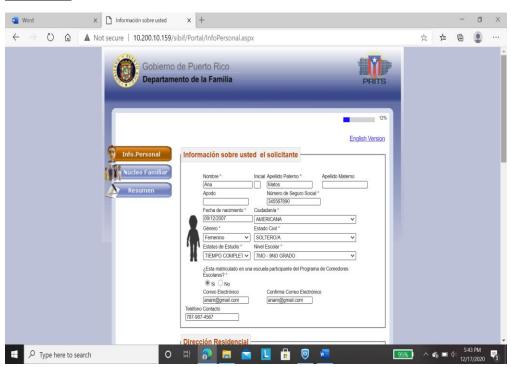




# 5<sup>th</sup> Screen

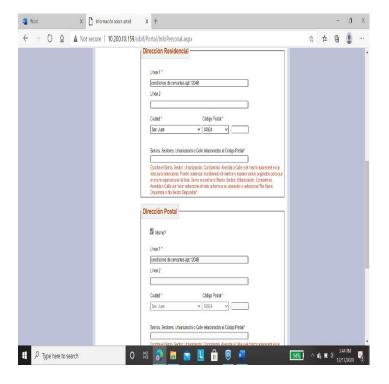




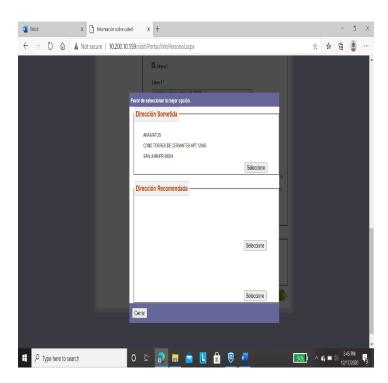




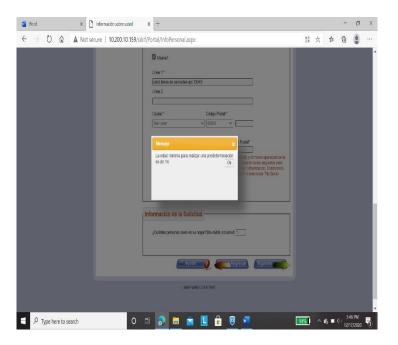
# 7th Screen

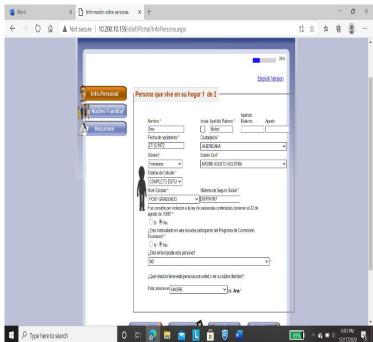


# 8th Screen



# 9th Screen



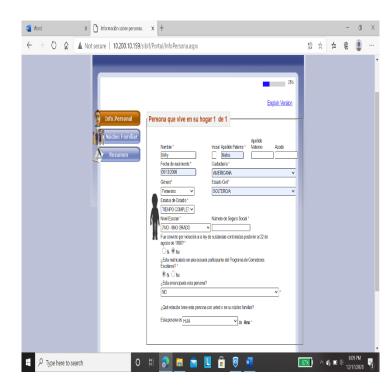




# 11th Screen

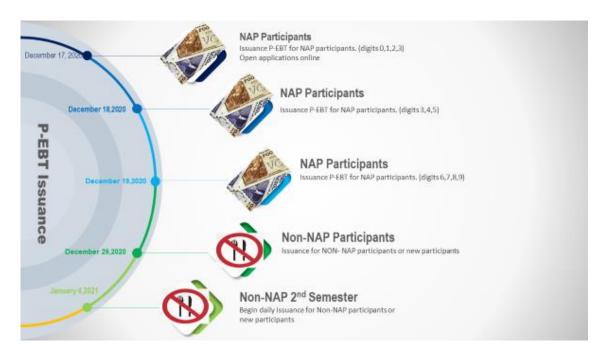
# 

90% ^ 6 = 4 602 PM 12/17/2020 \$



#### Tentative P-EBT Issuance Timeline SY 2020-21





ADSEF will issue new P-EBT cards for Non-NAP household's students. There will be no additional cost for these cards since they will be included as part of ADSEF current contract with EVERTEC. The NAP household's students will receive their benefits through their current benefit card.

**Puerto Rico does not receive D-SNAP**, so this would not be an issue. However, P-EBT issuances will be made as a sub-benefit type to maintain accountability at no additional charges from the EBT processor.

**Regarding the agency's draw/spend priority**, ADSEF will follow USDA recommendation of giving priority to P-EBT transactions.

However, the agency aims to draw and spend funds from NAP and P-EBT simultaneously. This strategy will prevent delays between the beneficiaries of each program.

Puerto Rico NAP program does not apply the "Expungement" rules to NAP benefits, instead implements the "expired" rule. Which means that instead of recapturing NAP benefits that have been deposited in a participant's account because it has been inactive for at least 180 days, these funds will "expire" if not used within 180 days of its deposit in the participants' account. Therefore, ADSEF intends to apply the "Expired" rule to the P-EBT benefits.

ADSEF and EVERTEC will use the same system currently in place for NAP participants' returned cards. If a P-EBT card is returned by mail to EVERTEC, they will automatically destroy it. Afterwards, they will create a list of returned cards and send to ADSEF, so the caseworkers can call the participant and update the address information and issue a new card at the local office. Once the address is corrected in the system, they will contact the participant so they can pick up the new card at the local or regional office<sup>8</sup> implemented 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?

Since Puerto Rico did not receive P-EBT benefits during SY 2019-20, the issue of assigning new cards or not, to existing P-EBT participants does **NOT APPLY**.

<sup>&</sup>lt;sup>8</sup> This would depend on the COVID-19 pandemic's behavioral. The local office instead could send the card to the corrected address.

# 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 benefits.
- USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.
- How will the State resolve dispute or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example; homeless children, foster care 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 process of P-EBT and how to use the benefit? Based on a 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 the 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 the 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)
  - O How will you provide P-EBT information to SNAP households?
- Will you provide information via mailers? Will the mailer(s) be a flyers/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?

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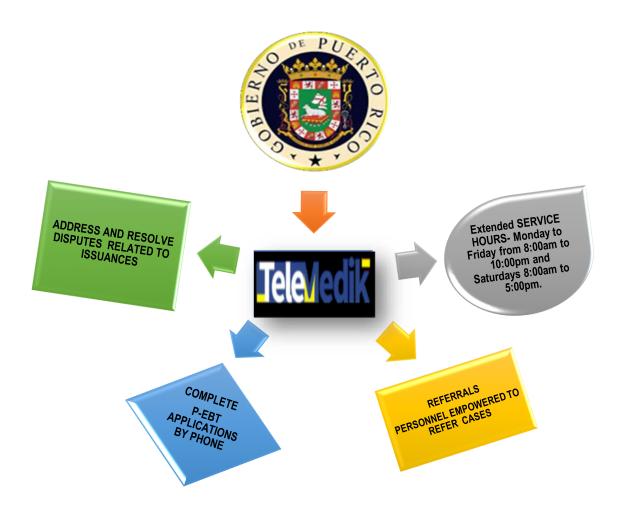


# Response:

Puerto Rico, through the ADSEF/FAM Department will use the services of a call center to address and resolve any dispute or issuance errors related to the P-EBT benefits. The services will be provided by TeleMedik, company that currently manages the Department of the Family's child protection hotline.

The diagram below illustrates the services that will be provided by Telemedik.

# **TeleMedik** will provide the following services:



# Puerto Rico will serve groups with potential access problems by employing diverse approaches.

- 1. Households **without internet** would be able to complete their application through the Hotline/ Call center. Information and instructions will be communicated using the P-EBT outreach program proposed, that aims to use several media alternatives.
- 2. Regarding **foster care** children, since these already receive NAP benefits, they will receive P-EBT benefits automatically. This only will apply just if the children are enrolled in a school that has been

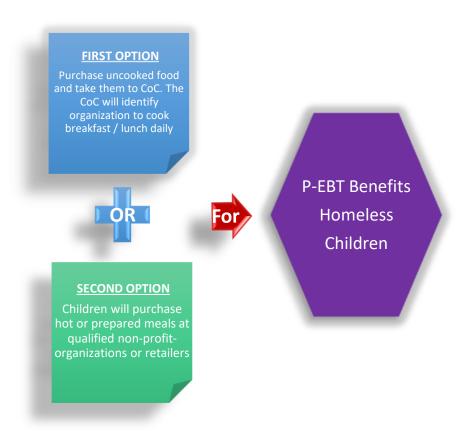


qualified because it is part of the USDA breakfast/lunch school program. ADSEF will contact the Foster homes to ensure that the children's data has been submitted to the PR DOE and the

contact and personal information has been entered correctly in the NAP system. ADSEF will also provide follow up on these children's benefits issuance.

3. Concerning **Homeless children**, the ADSEF will establish an MOU with the Puerto Rico's CoC organizations (502 and 503) which at this time provide support services to homeless people. The purpose is to identify homeless children currently enrolled in school that could be eligible to receive P-EBT benefits. If these children are NAP participants, their P-EBT benefits should automatically be deposited in their NAP EBT card. Notwithstanding, there is a concern regarding how these children would use their daily benefits since they are homeless there is a significant possibility that they do not have a place to cook their meals.

Consequently, ADSEF would like to propose the following two (2) options for identified/qualifying homeless children abetted by a CoC organization:



The idea is that the organizations which have identified qualifying homeless children could find a trustable organization that could receive their uncooked food and prepare them daily. Or the 2<sup>nd</sup> option, that is to allow this population to purchase prepared foods at non-profit organizations or qualified retailers.



- 4. Children **without social security.** Every child born in PR automatically receives a social security number when is registered. Those that do not have a social security number are non-American Citizens, therefore, they will be assigned a temporary identification number as they enter the online platform to complete the application. This number will be assigned until the end of the school year.
- 5. Regarding **children with disabilities**, ADSEF will work with the PR-DOE in order to identify within the lists provided any children with disabilities that are not part of a NAP household. In this case, ADSEF will refer them to the online application process or the hotline/call center which-ever is the circumstance, to complete the P-EBT benefits application.

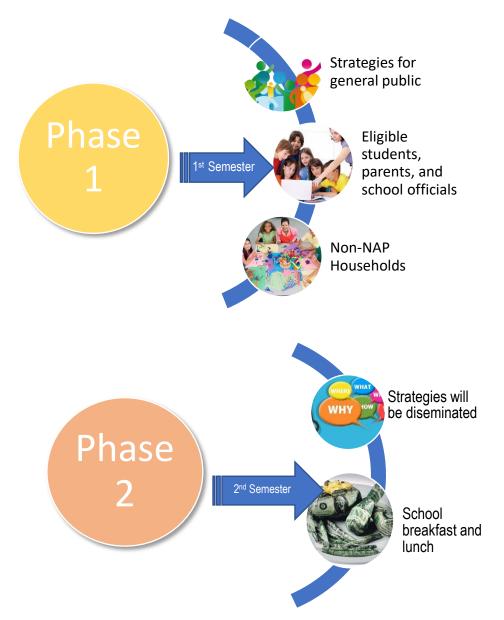
What follows describes Puerto Rico's public information campaign. This information is addressed to the general public:

# Outreach Campaign Description

The communications and outreach plan aims to educate all stakeholders and the general public about the Pandemic-EBT benefits approved for Puerto Rico students. These children are eligible because they participate in the free or reduced-price meals of the National School Lunch Program and School Breakfast Program. This plan will serve as a guidance document for communications and outreach strategies. ADSEF will update the recommendations as new data becomes available.

The campaign will reach all eligible students, their parents and school officials, NAP certified retailers, the Retailers Association (MIDA), Agriculture Association members, the main stakeholders, and the general public. ADSEF will implement the outreach plan in two (2) main phases: (Next page diagram)





Strategies will be directed to each phase, beginning with the general public as soon as the plan is approved. The outreach campaign will include introducing a new card for Non-NAP households and the reproduction of informational materials and communications.

	Strate	1 <sup>st</sup> Phase egies 1 <sup>st</sup> Semester	
	General Public		ligible Children & Families
	Pandemic-EBT benefits were approved for		Pandemic-EBT is a benefit granted to students who have been studying from home virtually while their school have been close because of the Pandemic
	Puerto Rico students' 2020-21 school year.		Students who currently receive the benefits of the School Breakfast/Lunch Program are eligible for the P-EBT benefits.
	These children are eligible because they participate in the free or reduced-price meals of		Families will receive the benefits for each child currently enrolled in eligible schools
Main Messages	the National School Lunch Program and School Breakfast Program.	Messages	Students in NAP households do not need to complete an online application. ADSEF will deposit the P-EBT benefits in the Family NAP Card.
	The program supports public health and safety, empowers families, and builds healthier		Students not part of a NAP household or currently studying in a private school need to fill an application. Once approved, EVERTEC will deposit their benefits in an EBT card and send it by mail
	communities.		A new Hotline consumer service ready will be available to assist students and their families answer questions and help to fill the application access to the Internet is a problem
	Research finds P-EBT has helped reduce food insecurity, and these dollars help support families		Paid and Earned media messages
	and drive economic activity.		Direct email to students
			Direct messages to NAP participants
	Press conference		Digital materials - Brochures and posters- Will include the following information, among other: Instructions for PINing a P-EBT card; an explanation of violations and penalties, such as trafficking, etc., An indication that benefits are non-transferable and Instructions for destroying the card, if they want to decline benefits.
			Recorded message in the NAP Help Desk line
Earn Media	Press releases		Brochure sent with the card's PIN letter with information regarding eligible food, available retailers, and a new hotline for consumer service
	Media Tours	Strategies	Application Portal Landing Page with relevant information about the program
	Social media posts Facebook Twitter	Citalog.co	Most frequently asked questions and answers
	Application online Information Landing page		
Paid	Print & Digital		
Media	Broadcast		
			Video messages with the most frequently asked questions and answers
	Paid interviews in Certified retailers' locations		
	Script for hotline in-takers		
Direct	Script for NAP help Desk-line		
Messages	Posters in certified retailers' locations		
	Orientation brochures at certified retailers		

Video messages



	Non-NAP Househo	ld Students and Priv	vate Schools
	Pandemic-EBT benefits were approved for Puerto Rico students 2020-21 school year		Paid and Earned media messages
Messages	Children are eligible to participate in the free or reduced-price meals of the National School Lunch Program and School Breakfast Program.		Direct email to students
	Eligible students can access the portal and fill an application. Will receive an EBT card with their benefits within 5 to 7 days.		Direct messages to NAP participants
	There will be a new Hotline consumer service ready to assist students and their families complete their applications and answer any questions.		Digital materials - Brochures and posters
PAGE SANS TO AN	ELICIA DE ATORTHESA SONOTE, PARENDA MARTINO POR SERVICIO PARENDA POR SERVICIO POR S	Strategies	Recorded message in the NAP Help Desk line
		Strategies	Brochure sent with the card's PIN letter with information regarding eligible food, available retailers, and a new hotline for consumer service
<b>1</b>			Application Portal Landing Page with relevant information about the program
			Most frequently asked questions and answers
			Video messages with the most frequently asked questions and answers

	Non-NAP household students and private schools				
	Pandemic-EBT benefits were approved for Puerto Rico students 2020-21 school year		Paid and Earned media messages		
	Children are eligible to participate in the free or reduced-price meals of the National School Lunch Program and School Breakfast Program.		Direct email to students		
Messages	essages Eligible students can access the portal and fill an application. Will receive an EBT card with their benefits within 5 to 7 days.	Strategies	Digital materials - Brochures and Infographic		
	There will be a new Hotline consumer service ready to assist students and their		ADSEF will include a brochure about eligible foods, retailers, and hotline phone number.		
	families complete their applications and answer any questions.		EVERTEC will mail the card's PIN with a letter.		
Earn	Social Media Posts		Most frequently asked questions in writing and video		
Media	Facebook  Twitter	Paid	Ads in leading media outlets and regional media Print & Digital		
	Instagram	Media	Broadcast Paid Interviews in certified retailers' locations		

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Posters in certified retailers' locations
Brochures orientation efforts in certified retailers
Video messages



2 <sup>nd</sup> Phase					
	Strategies for the	Second Sen			
	Pandemic-EBT benefits were approved for Puerto Rico students for the school year (SY) 2020-2021		Paid and Earned media messages		
Messages	Students in a hybrid system will be eligible for P-EBT benefits	Strategies	Direct email to students		
Ç	New Eligible students can access the portal and fill an application. Will receive an EBT card with their benefits within 5 to 7 days		Digital materials - Brochures and Infographic		
			Brochure about eligible food, retailers, and hotline with the card's PIN letter		
			Most frequently asked questions in writing and video		
			Paid Media and Earned media tactics		
	Press releases		Print & Digital		
	Media Tour	I	Broadcast		
Earn Media	Social media posts  Facebook Twitter Instagram	Paid Media	Ads in leading media outlets and regional media		
	Application Portal Information Landing Page new messages		Paid Interviews in certified retailers' locations		
Direct Outreach	Posters in certified retailers' locations Brochures orientation efforts in certified retailers Video messages answering most frequently asked questions	INT	MEDIA		
	E f	MAGA	RADIO NEWSPAPERS		



# **Customer Service Hotline**

ADSEF will provide orientations and information contents for the Customer Service Hotline suited for each stakeholder to ensure clarity and uniformity in the messages in the following areas.



Provides relevant program information.

Answer questions from potential and actual P-EBT households

Provide a mean to resolve disputes.

Assist people without access to the Internet a way to fill the application.

Assist people with disabilities to fill the application.

Provide information regarding the availability of funds and expungement rules.

Refer to the website for further information regarding eligible food and certified retailers.



# 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 receive 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 the USDA may hold State agencies liable for the aggregate overissuance 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 action would advance program purposes.



# **RESPONSE:**

In case of an over issuance of benefits ADSEF will investigate each case individually in order to establish which was the reason of the over issuance of benefits. If for any reason the results of the investigation demonstrate and confirms that the original benefits in issue, were made in error, the participant will be issued new benefits. In the specific case of a disputed guardianship, ADSEF will open an investigation to certify that the benefits were issued correctly. If an investigation establishes that the original issuance was correct, ADSEF shall not issue duplicated benefits.



# **P-EBT**ADMINISTRATIVE BUDGET NARRATIVE

# P-EBT Administrative Budget Summary



# Call Center: Telemedik

Staff	Description	Hrs/month	Cost	Total	Time Period <sup>9</sup>
In-Takers	Answer calls P-EBT Respond questions Fill applications Referrals	2,080	\$20/hr	\$499,190.00	12 months
Supervisor	Supervises In-takers	175	\$25.23/hr	\$47,124.00	
	Inbound/Outbound Calls	16,600 calls/month	\$.05	\$9,960.00	
			TOTAL	\$556,2	224.00

# IT Services: Various

IT Staffing Positions	Description	Company	Resources	Total Cost	Monthly	Rate	Hours	Comments
EBT	EBT- Cases Administered Invoice	Evertec		\$508,625	\$84,770.83			Cost PEBT participants
EBT	Issue Cards Automatically for New Case/Program added through batch	Evertec		\$24,265		\$115.00	211	Currently from the 1,100 hrs free of cost stipulated in the 4th Amendment, there is a balance of 275 hours; minus 211 hours of PEBT, remains balance of 64 hours free of cost. Other Option is with budget PEBT.
TOTAL				\$532,890				
Programmer Web	Implement changes to SIBIF platform for new P-EBT applicants (Non-NAP)	KPG	1	\$22,800		\$95.00	240	Add hours to actual contract <sup>10</sup>
TOTAL			1	\$22,800				
Business	Make analysis of IT systems' changes. Implement issuance			440.000		<b>\$75.00</b>	0.40	

\$18,000

\$18,000

1

\$75.00

240

Add hours to actual contract 11

changes for PEBT

and SAIC. Provide data, dashboard or report upon request. Leductech

**TOTAL** 

**Business** 

Analyst

<sup>&</sup>lt;sup>9</sup> Time period was taken to 12 months

<sup>&</sup>lt;sup>10</sup> Cost and hours will be added to current contract

<sup>&</sup>lt;sup>11</sup> Ibid



# Consultive Services: J. Santana and Associates Inc.

Staff	Description	Hours	Rate	Total
Senior Consultant	Will serve as a program manager for the P-EBT. Responsible of coordinating the efforts between the PR-DOE and ADSEF. Follow up and ensure that the agencies MOUs are implemented. Serve as a liaison and facilitator between ADSEF and FNS. Ensure that PR-DOE send monthly updates of children participation. Other tasks as assigned by the ADSEF's Administrator.	540	\$100.00	\$54,000.00
(1) Consultant	Will provide assistance in preparing all P-EBT Federal Reports.	96	\$80.00	\$7,680.00
(1) Consultant	Will monitor program's performance to ensure compliance with P-EBT federal program regulations. Verify compliance with partnering agencies.	192	\$80.00	\$15,360.00
	TOTAL	240		\$77,040.00 <sup>12</sup>

# Outreach Campaign: Advertising Agency- Reavis Group

Description	Details of services	Cost	Comments
Paid/Media Print/Digital Media	Conceptualization, writing and launching of the paid media campaign.	\$250,000	
Radio	<ul> <li>Media buying</li> <li>Negotiation for media placing.</li> </ul>	\$115,000	
Content Development and Arts	Web page development and maintenance	\$35,000	
Productions	Coordination of PSA campaigns  Development of arts for media placing and social media.	\$28,000	
Printing	Production of radio and print ads.	\$163,435	@ .5 per copy
	TOTAL	\$591,435. <sup>13</sup>	

<sup>&</sup>lt;sup>12</sup> Costs and hours will be added to current contract

 $<sup>^{13}</sup>$  \$365,000 from the total of \$591,435 is for media buy



# Public Relations - Strategic Communications Management

Description	Details of Services	Cost	Comments
Earn Media, Public Relations & Social Media Management.	<ul> <li>Conceptualization, writing and launching of the outreach campaign.</li> <li>Development of key messages</li> <li>Coordination of media tours</li> <li>Press releases.</li> <li>Coordination and production of press conferences</li> <li>Coordination and management of media relations</li> <li>Coordination with other central government agencies for assistance</li> <li>Research of vital statistics to better reach the target population.</li> <li>Internal communications, letters, reports and messages from the Secretary.</li> <li>Management and content of social media</li> <li>Social media management</li> <li>Development of community programs</li> <li>Professional and non-for-profit organizations relations</li> <li>Legislative Relations and presentations</li> <li>Services for the special need community</li> </ul>	\$200,000	This includes fees for Senior Executive Junior Executive social media manager photographer videographer and graphic arts manager.
	TOTAL	\$200,000	

Administrative Costs	\$1,998,389
Grand TOTAL <sup>14</sup>	\$1,990,509

<sup>&</sup>lt;sup>14</sup> Grand total is the sum of all the services described above.



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

Orlando López Belmonte

Secretary

Department of the Family

Alberto Fradera Vázquez

Administrator

**ADSEF** 

Date of Request: December 29th, 2020