

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(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. (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).
Disclaimer:	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.

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, 2020-2021

1. **State:** Colorado

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*¹ 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
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

¹ 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.

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

Response:

Colorado proposes to operate a Pandemic EBT (P-EBT) plan during the 2020-2021 School Year for both School Age Children and Children in Child Care. The date range covered by this plan is August 1, 2020 through May 31, 2021. *Upon further guidance from FNS, Colorado may amend this plan at a future date to include children who may be eligible between June 1, 2021 and September 30, 2021.*

School Age Children

Colorado proposes to operate a P-EBT program for School Age children during the 2020-2021 School Year, which includes instruction days between August 1, 2020 and May 31, 2021.

Colorado estimates issuing approximately \$200,000,000 in P-EBT benefits to eligible school children during the 2020-2021 School Year. This includes an estimated \$80,000,000 issued to school children in SNAP households and an estimated \$120,000,000 issued to school children in non-SNAP households. The monthly issuance amount is expected to range from \$31 million per month (in January when most schools were remote) to approximately \$10 million per month (in May when most schools will be back to in-person).

Colorado estimates that approximately 300,000 school children, Pre-K through 12th grade, will be eligible for P-EBT during the 2020-2021 School Year. This includes 120,000 (40%) of which reside in SNAP households and 180,000 (60%) residing in non-SNAP households.

Colorado commits to informing USDA of any significant increase or decrease in these estimated numbers as child-level data is gathered from Colorado’s local school districts.

Tentative P-EBT Issuance Schedule

Colorado will issue P-EBT benefits retroactively for the 2020-2021 school year. At the time of plan submission, the P-EBT issuance schedule is expected to be:

- School Data Collection Deadline #1 – April 23, 2021
- School Data Collection Deadline #2 - May 31, 2021
- August-December benefits - Paid in late May
- January-March benefits - Paid in late June
- April-May benefits - Paid in late July

4. P-EBT for School Children

A. Eligible Children

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Standard for P-EBT Eligibility

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

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:

irectly certified or determined "other source categorically eligible" for SY 2020-2021, **or**

ertified through submission of a household application processed by the child's school district for SY 2020-2021, **or**

rolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**

irectly 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.

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. **Or**

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

please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

There are two agencies in Colorado directly involved in the administration of P-EBT and a third agency that will play a support role in the administration of P-EBT benefits to the Child Care population.

- The Colorado Department of Education (CDE) is responsible for gathering and confirming school closure data, student data, confirming eligibility for Free and Reduced-Price (F/RP) meals, and therefore P-EBT, for public and non-public schools. CDE will communicate directly with school districts and advise school districts on how to communicate with families about P-EBT. CDE will be supported by an education data vendor (Crocus) in collecting new data from public school districts and private schools for the purpose of P-EBT.
- The Colorado Department of Human Services (CDHS) is responsible for matching the student data provided by CDE to SNAP enrollment data, managing the data repository, issuing P-EBT benefits, tracking P-EBT benefits issuance and spending, reporting to FNS, and overseeing the P-EBT Customer Service Hotline. CDHS will be supported by their eligibility system vendor (Deloitte) to implement P-EBT.
- The Colorado Department of Public Health and Environment will play a support role in the administration of P-EBT to eligible children under the age of six.

For the 2019-2020 school year, Colorado created a data repository of all school children to match against the application that Colorado created for P-EBT. This repository included indicators for children attending schools that participated in the National School Lunch Program (NSLP) or School Breakfast Program (SBP), children directly certified for free school meals (including SNAP and TANF recipients and migrant youth), children certified through an application for F/RP meals and all children attending Community Eligibility Provision (CEP), Provision 2, or Provision 3 schools.

For the 2020-2021 school year, Colorado plans to update and improve upon this data repository by initiating a new data collection from school districts to acquire updated student information, including household addresses, which were not previously available. This process will include both public and non-public schools in Colorado.

- **Step 1:** CDE, with the support of a data vendor (Crocus), will collect Student Enrollment Data for the 2020-2021 school year directly from school districts, including:
 - Child First Name, Last Name, DOB, Address, State-assigned Student ID number (SASID), Gender
 - County, School Name, School District, School Type (Elementary, Middle, High School)
 - F/RP eligibility for 2020-2021 school year (if determined)

- Indicator of children who have opted into remote learning for an entire year, regardless of School Operating Model
 - Parent/Guardian name
- **Step 2:** CDHS will append the indicator of F/RP meal eligibility from the 2019-2020 Repository to the 2020-2021 Student Enrollment Data. Children enrolled in an NSLP-participating school during the 2020-2021 school year with F/RP meal eligibility during EITHER the 2019-2020 or 2020-2021 school year will be deemed eligible for P-EBT, unless CDHS knows the child reapplied for F/RP meal eligibility in 2020-2021 and was denied. This will ensure that children who are F/RP eligible but did not have an opportunity to fill out a new F/RP application during the current school year will be identified as eligible for P-EBT. CDHS will also confirm that the most recent information on CEP/Provision 2/Provision 3 schools is imported into the 2020-2021 data repository.
 - **Step 3:** The updated and appended 2020-2021 Student Enrollment Data will be matched to Colorado’s existing SNAP caseload within CDHS’ eligibility system (CBMS). Children that can be matched to an existing SNAP case will receive P-EBT benefits on their household’s existing EBT card.
 - **Step 4:** Children who cannot be matched to an existing SNAP case will receive P-EBT benefits on a new P-EBT card to be mailed to the address identified by CDE. Families will be instructed to keep this card, as it will be reloaded with P-EBT benefits for the remainder of the school year. Cards will be issued in the child’s name. The parent/guardian name provided by CDE will be printed on the outside envelope.
 - **Step 5: Ongoing Updates:** After finalizing the 2020-2021 repository of P-EBT eligible students as described above, CDE will identify newly-eligible students, such as those who become eligible for P-EBT through direct certification (e.g. enrolling in SNAP), through attending a CEP school, or by completing a F/RP application. Schools are already required to complete direct certification matches four times per year (Starting July 1 - August 15th, by October 31, by December 15, and by March 15). Schools will be encouraged to run direct certification matches more frequently (e.g. at least monthly) to ensure all eligible children have timely access to P-EBT benefits.

Children newly eligible for F/RP meals in SY 20-21 will be considered eligible back to the beginning of the school year, regardless of when the application for F/RP meals was submitted. Most school districts in Colorado did not systematically collect F/RP meal applications because they were utilizing available waivers to serve meals to all students. In many school districts, the first concerted push to collect F/RP meal applications will occur in the final months of school to make sure all eligible children have access to P-EBT.

To confirm each child’s lack of access to meals at school, Colorado will use a combination of child-level data provided from school districts (for children with fully-virtual schedules) and simplifying assumptions for children enrolled in the school district’s predominant learning

model. Throughout the 2020-2021 school year, a team at CDE has been actively tracking school operating models at the district level by month, with separate indicators for Elementary vs. Middle and High School buildings, by reviewing published school district calendars and communicating directly with school district officials. Below is a list of regularly updated data fields collected by CDE:

- School district name
- School district number
- County
- Elementary school status (in-person, hybrid, or remote)
- Middle school / high school status (in-person, hybrid, or remote)
- Offering an online option (yes/no)
- Date updated

To determine each child's model for learning, Colorado, as a decentralized, local control state will use the best feasible data available. This means having the school districts provide information via the CDE data collection effort which confirms school level closure data and any school that has deviated from the set school district grade level modalities. School districts will identify schools that deviated from the district level data and will inform CDE for which months the learning modality should be otherwise reflected. Colorado is confident that District Level and Grade Level information is appropriate and aligns benefits as closely as possible to children's actual circumstances, since Elementary, Middle, and High schools within each District largely utilized the same learning model each month. As noted, School Districts will be required to review and confirm the predominant learning model by month for schools within their District before benefits will be issued.

To ensure that fully virtual students are not missed through the use of simplifying assumptions, CDE will request a list of children who opted for a fully-virtual learning model for the full school year as of October 1, 2020 during the student-level data collection for P-EBT. This date represents the deadline for when schools were required to submit their student data for the year. Additionally, it should be noted that the message communicated to families was that they were choosing to opt-into remote learning for the entire 2020 - 2021 school year. CDE has confirmed with the largest districts, named in Section 5 of this plan, that children who elected the fully virtual option as of October were not permitted to deselect that election until late March 2021. Because of this, virtual students will receive P-EBT for the months of October through March. Beyond this, schools began returning to in-person modality. Therefore, Colorado is using a simplified assumption that the plurality of Colorado children opted into remote learning through March. If a child remained remote for the months of April and May or if the child opted-into a fully virtual model after October 1, 2020, the family will be able to provide information supporting their modality via the P-EBT Call Center. Examples of these situations may consist of a) a family moving from one Colorado school district to another and therefore changing learning modality or b) a family's decision to switch to remote learning based on circumstances that evolved after the October 1, 2020 deadline. The change in modality will be verified using the best available information the family can provide. This will assure that all children eligible for P-EBT are captured.

Program Integrity Measures

CDHS has measures in place to ensure that each individual child only receives one P-EBT issuance for each month, even when the child qualifies under both the School or Child Care eligibility criteria. CDHS' eligibility system (CBMS) has unique identifiers for each individual child regardless of whether P-EBT benefits are being issued to an existing EBT card (for children attached to a SNAP case) or a new P-EBT card (for children in non-SNAP households).

CDHS will use recently collected data, including updated mailing addresses, from CDE to issue P-EBT benefits to non-SNAP children, to ensure they reach the eligible child. In cases where P-EBT cards are returned as undeliverable or reported as never received by the eligible child's parent or guardian, CDHS and its vendors will require multiple identifiers, such as the child's date of birth and first and last name of the parent/guardian on file with the school, before the original P-EBT card will be cancelled and reissued to a new address.

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:

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.

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.).

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

B. School Status

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

- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

Colorado is using the five-day threshold to determine if the district meets this requirement for eligibility for P-EBT. After this initial threshold is met, Colorado will determine the correct operating model for each month and this information will be used to determine the monthly benefit.

For example, if District-confirmed monthly modality information shows that Elementary Schools in a School District operated In-Person from August-October and switched to Hybrid in the second week of November, Colorado would consider that School District to have met the five-day threshold for the year and children will be eligible for the standard Hybrid benefit amount for November, and any subsequent months when the District's Elementary Schools operate a Hybrid or Remote model.

Only School Districts that confirm having a "Hybrid" or "Remote" learning in at least one month will be determined eligible for P-EBT benefits during the 2020-2021 school year. As of February 2021, there are approximately 46,000 children enrolled in 79 school districts statewide that may be ineligible for P-EBT benefits because the schools have operated In-Person all year. It is not yet known what percentage of these children may qualify for P-EBT because they opted into Remote learning for the entire school year by October 1, 2020.

Standard for Benefit Levels

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.

5. Benefit Levels

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

Notes:

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

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

Response: [please use as much space as needed]

Colorado proposes to use simplifying assumptions to set two potential P-EBT benefit levels for children with “hybrid” or “remote” learning models.

- **The “Remote” benefit level was calculated as an average of 20 days/month x \$6.82/day = \$136.40/month.** This was calculated by taking the average number of instructional days for the entire school year (180), divided by 9 months. Because most School Districts in Colorado had very few, if any, instructional days in August, we proposed to consolidate August/September into a single “issuance month”, so there would be nine issuance months for the full school year (September-May).

The “average number of instructional days” was calculated by reviewing the academic calendars of the 14 largest school districts in Colorado which instruct nearly two-thirds (64%) of students in Colorado.

- **The proposed “Hybrid” benefit level was calculated as 12 days/month x \$6.82/day = \$81.84/month.** This calculation is based on a survey of school districts in late February, which showed that hybrid schedules in Colorado ranged from 2-4 days of remote learning each week. The average and most common schedule was 3 days of remote learning per week, so Colorado proposes to use simplifying assumptions to apply this standard to all students with Hybrid schedules each month. Because the average “Remote” schedule is 20 days per month (i.e. 5 days per week for 4 weeks), the most appropriate to consider the average Hybrid schedule to be 12 days per month (i.e. 3 days per week for 4 weeks).

The monthly benefit level of \$136.40/month for “Remote” students will remain consistent throughout the 2020-2021 school year. Colorado will conduct another school district survey in May to determine whether the average Hybrid benefit amount needs to be adjusted for March, April, and May. All P-EBT benefits will be issued retroactively in Colorado, so CDE and CDHS will have an opportunity to adjust the Hybrid benefit level, as necessary.

For Reference - The 14 largest school districts in Colorado that were used as a basis for simplifying assumptions described above are:

District Name	Preschool-12 Pupil Membership	County Name
Denver County 1	89,061	DENVER
Jefferson County R-1	80,088	JEFFERSON
Douglas County Re 1	62,979	DOUGLAS
Cherry Creek 5	54,167	ARAPAHOE
Adams-Arapahoe 28J	37,907	ARAPAHOE
Adams 12 Five Star Schools	36,654	ADAMS
St Vrain Valley RE1J	31,312	BOULDER
Poudre R-1	29,418	LARIMER
Boulder Valley Re 2	29,240	BOULDER
Academy 20	25,711	EL PASO
District 49	23,984	EL PASO
Colorado Springs 11	23,885	EL PASO
Greeley 6	21,883	WELD
Mesa County Valley 51	21,081	MESA

6. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?

- If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Colorado developed the timeline below with input from all relevant agency stakeholders and its vendors.

Tentative Implementation Timeline

- Plan Approval Date: TBD
- CDE Launches Data Submission Tool for School Districts: April 5 (new date pending plan approval)
- Data Submission Deadlines for Schools: April 23; May 31
- Public Communications Release Date: 1 Day after Plan Approval
- CDE Delivers Clean Student Eligibility File to CDHS for Processing: April 30
- CDHS matches Student Eligibility File to CBMS to identify SNAP participants: May 4
- P-EBT file sent to EBT processor for SNAP and non-SNAP children: May 24
- CDHS launches P-EBT look-up screen in CBMS: May 9
- Call Center Go Live Date: Within 30 days of an approved P-EBT Plan
- P-EBT benefits loaded to existing SNAP cases: May 24-26
- P-EBT cards printed and mailed to non-SNAP children: Within 10 business days of FIS receiving the P-EBT file from CDHS
- Contingency Plan: School districts who fail to submit Student Information for P-EBT by the end of the 2020-2021 school year (circa June 1, 2021), along with School Districts that need to correct data errors, will have an opportunity to do so up until mid-September 2021.

As referenced in the Timeline above, CDHS will issue P-EBT benefits to current SNAP households on their existing SNAP EBT cards. New P-EBT cards with a generic design (same as Spring 2020) will be mailed to eligible children who could not be matched to a current SNAP case. This includes children who were previously part of a SNAP household but had their case closed more than 30 days prior to the P-EBT issuance (e.g. for the first P-EBT issuance in May, any child whose SNAP case was closed as of 3/31/2021 will be issued a new P-EBT card in the child's name). Eligible households will be informed to keep their new P-EBT card, as it will be reloaded for the remainder of the school year.

P-EBT cards for non-SNAP children will be issued to individual children. Children will not be grouped into households. For children in SNAP households, benefits will go to the Head of Household on their existing EBT card. P-EBT cards will be pinned with the child's DOB and Zip Code to accommodate the fact that SSNs are not available for all children. Internet access is not necessary to access P-EBT benefits as no application is required. Households will receive a P-

EBT card in the mail without having to proactively request one. Reasonable accommodations for individuals with disabilities will be provided by the P-EBT Call Center.

As was done during P-EBT 1.0, CDHS will use a separate Benefit Code for P-EBT to track spending separately from SNAP and other benefit types. P-EBT will make P-EBT the first draw/spend priority for current EBT card users and P-EBT benefits will remain available for use for 274 days, in alignment with SNAP expungement rules.

P-EBT benefits will be staggered over 2-3 days at the end of each month, so as not to overlap with Colorado’s normal SNAP issuance schedule or Emergency Allotments. The current P-EBT payment schedule is:

Aug/September (Combined “Month 1”) through December: ~May 24-26
January through March: ~June 24-26
April and May: ~July 24-26

Returned Cards

CDHS and CDE designed P-EBT 2.0 to collect updated addresses from schools as close as possible to the time new P-EBT cards will be mailed to eligible families. Still, the team understands that some cards are still likely to be returned as undeliverable to Colorado’s EBT processor (FIS). CDHS confirmed that FIS can add Child DOB to the state’s Returned Card Report so P-EBT issuances can be identified.

As described below, CDHS is building a dedicated P-EBT Call Center that will have access to information from FIS about which cards have been returned. The Call Center will have the ability to reissue these returned P-EBT cards for families that contact the Call Center.

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.

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

USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the

States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

Resolving Disputes and Issuance Errors

CDHS will contract with a Call Center vendor to staff a P-EBT Call Center beginning in April 2021. The Call Center vendor will respond to inbound calls and emails related to P-EBT. The Call Center vendor will receive comprehensive training from CDHS on frequently asked questions and will have limited access to CDHS' systems in order to respond to child-specific P-EBT inquiries and make address updates where appropriate. The P-EBT Call Center will be open Monday through Friday from 8:00am to 7:30pm and Saturday from 8:00am to 12:00pm Mountain Time.

If a parent/guardian disputes their child's eligibility for P-EBT or the amount of the child's P-EBT benefit, the P-EBT Call Center will be able to research the child's case through a limited view portal into CBMS and the data repository. For a child who was not included on the school's list of eligible children where the parent/guardian believe the child should have been included (e.g. because the child is enrolled in SNAP or F/RP meals), the P-EBT Call Center will establish a process for regular communication with the relevant school district for the school district to investigate the concern and take appropriate next steps.

The tentative plan is to build a Dispute Resolution "file" that tracks data discrepancies and other issues reported through the Call Center for CDHS to share with CDE, and subsequently, the School Districts on a regular cadence (e.g. monthly). Should administrative funds be approved by FNS, CDE proposes to provide grant funding to school districts in order to support summer staffing for timely review (approval/rejection) of Dispute Resolution data collected by CDHS. At a minimum, school districts will be expected to review any outstanding Dispute Resolution data upon returning to normal staffing levels in August so CDHS could issue any final supplemental issuances to eligible children before September 30, 2021.

Children with Potential Access Barriers

CDE has included the McKinney-Vento Director in P-EBT planning to ensure P-EBT benefits reach eligible children who are homeless and unstably housed. Most of these children have a mailing address on file with the school, but some are P.O. boxes or change frequently enough that the address may not be considered reliable. In these instances, or where an address is identified as invalid before card mailing occurs, P-EBT cards can be mailed to the school and/or the SNAP county offices. Schools will be able to opt-out if they are unable to accept the responsibility to distribute cards to these households. CDE and CDHS are still working with the McKinney-Vento director and school districts to develop appropriate protocols for any school-based card distribution, which will be shared with FNS when available.

CDE's Foster Education Coordinator has access to the most up-to-date data on foster student information, so CDE will ensure that the address used for mailing P-EBT cards is accurate before sending the Student Enrollment File to CDHS for P-EBT processing.

To ensure equal access to families with Limited English Proficiency (LEP), CDHS' P-EBT Call Center will utilize Language Line. CDHS will mail P-EBT-related notices in both English and Spanish, and outreach materials are being created in a range of additional languages. Community partners will also support outreach and education efforts with LEP families.

Public Information Campaign

In collaboration with CDE and community partners, CDHS will provide information to the general public regarding P-EBT benefits and eligibility through a variety of communication channels. Similar to the Spring 2020 issuance, CDE and CDHS will continue to host a dedicated website with up-to-date information on P-EBT, including eligibility criteria and other frequently asked questions. This website will be promoted on CDE and CDHS's social media platforms, such as Facebook and Twitter. Both departments will also issue press releases regarding updated P-EBT information. Furthermore, with the help of a marketing agency, CDHS plans to develop and execute a digital statewide messaging campaign around P-EBT benefits. The goal of this campaign will be to inform likely-eligible households on the availability, eligibility requirements, and benefits of P-EBT. The channels used for this campaign will likely be social media platforms, partner newsletter, and school communications. However, community partners will remain a core component of the information campaign and their networks will be used to cross-promote P-EBT through flyers, text messages, social media, and mailers.

In order to make the messaging campaign easy for partners, the state will work collaboratively to create and promote a P-EBT outreach toolkit for the 2020-2021 school year with editable flyers and social media messages, available in English and Spanish. A subsequent goal of this toolkit will be to provide schools and school districts with marketing strategies and messages that can be sent home with families once the plan has been approved. These messages will be tailored to encourage the completion of the Free and Reduced-Price Lunch Application and its relationship to P-EBT this year. Messages from the toolkit may also be tailored to the families participating in The Child and Adult Care Food Program (CACFP) and The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to ensure families are aware of P-EBT and association with SNAP. The goal of these messages will be to explain the availability of SNAP and how to submit an application if interested.

Direct Communication

Families will receive a notice letter included with their card or mailed to them as part of auto-issuance which will include a general explanation of P-EBT, eligibility for the program, benefit amounts, instructions for setting up their card, how to request a replacement card, how to check

balances, where P-EBT can be used, eligible items for purchase, who to contact for questions, an explanation of violations and penalties, such as trafficking, an indication that benefits are non-transferable, and instructions for destroying the card and opting out, if they want to decline benefits.

The letters will also provide resources for the PEBT Call Center that can assist families with card issues, and to the CDHS website <https://cdhs.colorado.gov/p-ebt> where more information on P-EBT can be found. For newly eligible children, the notice will also include information on where to go for step-by-step instructions on setting up a PIN for their card and what to do if they do not want to use benefits. The notice letters will be available in Spanish and English.

Non-SNAP and SNAP Households

P-EBT participants from Non-SNAP and SNAP households will receive notice letters upon initial issuance. Letters will outline information mentioned previously in the direct communication section of the plan, and direct participants to resources such as the call center and website where further information can be found. Notice letters will also outline how P-EBT benefits are issued depending on SNAP participation. All households will be directed to the new P-EBT call center where they can receive more information on P-EBT cards and funds.

Retailer Communication

The Colorado Retail Council and Rocky Mountain Food Industry Association will be utilized to prepare grocery retailers for the increased spending. CDHS will take the lead in messaging to these groups, with whom the Department has previously worked under P-EBT 1.0. This group will also ensure cashiers are prepared for a high number of new, first-time EBT card users and potentially EBT cards that look different from previously issued cards.

8. 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]

As a general rule, CDHS will not pursue claims against minors, as the P-EBT cards issued to non-SNAP households are issued directly to eligible children. Colorado will mitigate over-issuances by using a direct issuance strategy, retroactively issuing benefits during the 2020-2021 school year, and ensuring deduplication so no child receives more than one P-EBT benefit in a month. Any P-EBT cases identified as incorrect will be rectified by not issuing ongoing P-EBT benefits. Colorado will work with FNS regarding procedures for overpayments related to suspected fraud should any be reported or identified through the P-EBT Call Center.

9. 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.

10. Administrative Funding

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

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

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program,

Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

11. Release of Information

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

12. Civil Rights Statement

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.

13. 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
Karla Maraccini, Division Director, Food & Energy Assistance
Colorado Department of Human Services



Signature
Print Name and Title
Brehan Riley, Director of School Nutrition
Colorado Department of Education

Date of Request: April 8, 2021