

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

*Additional context and background for this document can be found at:*

<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

## State Plan for Pandemic EBT: School Year 2020-2021

1. **State:** South Carolina

2. **Primary Citations:** Families First Coronavirus Response Act; Continuing Appropriations Act, 2021 and Other Extensions Act

3. **Executive Summary:**

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

- a. The **date range** covered by this State plan or amendment.
- b. Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- 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

**State Response:**

South Carolina proposes to build off its previously approved P-EBT plan for March – June 2020. The date range for the current plan will be from September 1, 2020 – June 11, 2021. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The estimates of P-EBT issuance during the date range coverage period are as follows (assumes 40% of eligible students are attending virtually and 60% of eligible students are attending hybrid throughout the school year 2020-2021):

- Average monthly issuances of \$42,028,809 (Assumes total monthly issuance divided by the total number of students [481,099] then multiplied by the number of either SNAP children [174,547] or non-SNAP children [306,552] from the students eligible for SY 2019-2020 PEBT issuance).
  - Estimated monthly amount issued to school children in SNAP households is \$15,248,426.
  - Estimated monthly amount issued to school children in non-SNAP households is \$26,780,383.
- Total issuance of \$420,288,086 (estimated total days from September 2020 through June 2021 multiplied by number of students from SY 2019-2020 P-EBT issuance).
  - Estimated total amount issued to school children in SNAP households is \$152,484,259.
  - Estimated total amount issued to school children in non-SNAP households is \$267,803,827.

The estimated total **number** of children to which the State will issue P-EBT benefits (based on SY 2019-2020 numbers) is approximately 481,099.

- Estimated number of school children in SNAP households is 174,547.

- Estimated number of school children in non-SNAP households is 306,552.

### **Administrative Cost Estimates**

The estimated total amount of administrative funds the State needs to complete the work described in this plan is **\$9,494,119**. This includes estimated EBT contractual costs, as well as administrative/staffing costs for both implementing agencies, as described below.

Based on the previous iteration of P-EBT, South Carolina discovered that issuing P-EBT benefits to existing SNAP EBT cards was problematic due to misrepresentation of households regarding non-custodial versus custodial parents. Therefore, for the SY 2020-2021 P-EBT issuance, the state intends to issue new/unique P-EBT cards to all SNAP students. In addition, due to the length of time that has transpired since the last issuance of P-EBT benefits in South Carolina, new P-EBT cards will be issued to families who have already been previously issued a P-EBT card. The state will continue its use of the previously established benefit code (DSEP for non-SNAP) which was created specifically for P-EBT.

	Initial Case Set Fee (Month 1)	Cost (Per Month, Per Card) Months 2-10	Cost Per Student	# Students (19-20 SY)	Total Estimated Cost
<b>CPCM</b>					
	\$5.70	\$1.35	\$17.85	481,099	\$8,587,617
<b>Card Stock</b>					
All Students	Included in Initial Card setup fee				-----
Replacement Cards			\$1.50 per card	240,550	\$360,825
				<b>Total</b>	<b>\$8,948,442</b>

Staffing Cost	Number of Staff	March -December 2021
Department of Social Services	11 Full Time, 5 Contract, 10 Temporary	\$476,677
Department of Education	1 Half Time	\$50,000
	<b>Total</b>	<b>\$526,677</b>

Equipment Needs		March- December 2021
Department of Social Services	10 computer setups	\$16,000
Department of Education	Office Setup	\$3,000
	<b>Total</b>	<b>\$19,000</b>

### **Tentative Issuance Schedule**

The state proposes to use a uniform start date (September 1, 2020) and uniform end date (June 11, 2021) based on the majority of districts opening and closure dates for the 2020-2021 school year.

South Carolina plans to issue the initial P-EBT benefit (covering September 2020 – December 2020) in March 2021. For ongoing issuance of P-EBT benefits covering January 2021 - June 2021, South Carolina intends to issue P-EBT benefits retroactively in two-month increments. The proposed issuance schedule is as follows:

P-EBT Benefit Months	Issuance Month
September 2020 – Dec 2020	March 2021
January 2021 - February 2021	April 2021
March – April 2021	May 2021
May – June 2021	July 2021

## A. Eligible Children

### *Standard for P-EBT Eligibility*

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

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

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

### **State Response:**

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

- The Department of Social Services (DSS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards, replacement cards, and notification to recipients.
- The Department of Education (DOE), in collaboration with the local school districts, is responsible for confirming eligibility determination to include but not limited to the direct certification process and the NSLP application process, the monitoring and collecting of student virtual attendance and provision of customer service and support, to include but not limited to, P-EBT eligibility determination.

To identify eligible school children and confirm their eligibility, South Carolina will utilize its web-based student information system, PowerSchool, in conjunction with the student data listing provided by DOE for the SY 2019-2020 P-EBT issuance, to compile a data listing of eligible students. To finalize the data listing, DOE Office of Research and Data Analysis (ORDA) will remove students who have graduated or moved out of district and add students newly eligible by way of direct certification (SNAP recipients), other categorical eligibility sources or via the SY20-21 National School Lunch Program (NSLP) approved household applications

(non-SNAP recipients).

A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school. Public school districts are required by the state to track the number of days a student is virtually present. Virtually present days are days that the student is not attending school, in person. For the purposes of P-EBT, private schools who administer NSLP will be required to track a student's virtual attendance and provide that information to DOE. A student's virtual attendance will confirm their access to meals at school and P-EBT benefit level.

The State plans to issue P-EBT retroactively in two-month increments. DOE will request the districts provide any updates to a child's virtual attendance no later than the 10<sup>th</sup> of the following month. DOE will provide the updated benefit file to DSS in two-month increments no later than the 15<sup>th</sup> of the following month. The estimated timelines for submitting data from school districts to DOE and from DOE to DSS are as follows:

<b>Benefit Months</b>	<b>Date Updates Due from School Districts to DOE</b>	<b>Date DOE will Submit Benefit File to DSS</b>
September – December 2020	January 20, 2021	February 5, 2021
January - February 2021	March 10, 2021	March 15, 2021
March – April 2021	May 10, 2021	May 15, 2021
May – June 2021	June 20, 2021	July 15, 2021

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced-price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

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

### **State Response:**

South Carolina will first determine school level eligibility of all NSLP schools and then will identify, confirm and monitor the status of individual students through bi-monthly reporting from school districts to DOE. DOE will provide guidance to each district on how report a student's virtual attendance. NSLP-eligible districts or schools will have eligible students if the students meet the following criteria and the school schedule has been altered for 5 consecutive days:

- Students who opt into fully remote or virtual learning for more than 5 consecutive days (classified as "remote" for the purposes of benefit calculation), or
- Students are on a hybrid schedule and not in the classroom 5 days per week.

South Carolina schools track the virtual attendance for each student. All students attending school in a virtual capacity (inclusive of the in-person exceptions listed above) will be eligible for P-EBT. Schools will submit this information via a data file to DOE according to the schedule outlined on page 5 of this plan. South Carolina schools also track any changes in each student's virtual attendance so that DOE will receive up-to-date information in the bi-monthly data files.

#### 4. Benefit Levels

*Standard for Benefit Levels*

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

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack <b>(New)</b>	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$5.86
Alaska	\$5.79	\$3.64	1.56	\$9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	\$4.20	\$2.64	1.13	\$6.84

Notes:

1. Lunch rates include the 7 cents 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.

**State Response:**

South Carolina is using its previous experience in administering P-EBT to better inform its strategy. South Carolina DOE has implemented a methodology to calculate the exact number of days each child attended school through a virtual portal. The means of reporting a student's individual count of virtually present days will assist with resolving previous issues with tracking and calculating the number of P-EBT eligible days. A student's virtual attendance will be inclusive of the following:

- Students whose school district is operating a fully virtual learning model.
- Students whose school district is operating a hybrid learning model.
- Students whose school district is operating an in-person or hybrid model, but the family opts into fully remote learning.
- Students who are absent from an in-person learning model due to COVID and the need to quarantine.

To account for the fluid nature of the pandemic and that a student's status may change mid-month the state will be issuing benefits retroactively for the previous months using the reported virtual attendance as reported by the school district. Students eligible for free or reduced meals through December 2020 will be paid from the first day of school in September. For students that become eligible from January 2021 forward will be paid from the first day of the month that they become eligible (i.e. determined free on January 15<sup>th</sup> will be paid benefits from January 1). All SFAs are still taking and processing free and reduced applications as directed/required by USDA.

P-EBT benefits will be calculated based on the daily rate of \$6.82 and the number of days per month the student attended virtually. The maximum monthly benefit amounts are as follows:

<b>Month</b>	<b>Number of School Days</b>	<b>Maximum Monthly Allotment (# of days x \$6.82)</b>
September 2020	21	\$143
October 2020	22	\$150
November 2020	18	\$123
December 2020	14	\$95
January 2021	19	\$130
February 2021	20	\$136
March 2021	23	\$157
April 2021	16	\$109
May 2021	21	\$143
June 2021	9	\$61



## 5. 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?

### **State Response:**

It is South Carolina’s goal to issue September 2020 – December 2020 P-EBT benefits in March 2021. For ongoing issuance of P-EBT benefits (January 2021 - June 2021), South Carolina intends to issue P-EBT benefits in retroactively in two-month increments. The proposed issuance schedule is as follows:

<b>P-EBT Benefit Months</b>	<b>Issuance Dates</b>
September 2020 – December 2021	March 22 – March 31, 2021
January 2021 – February 2021	April 20 - April 30, 2021
March – April 2021	May 20 – May 30, 2021
May – June 2021	July 20 - July 30, 2021

The feasibility of this will depend on the date of plan approval and availability of student eligibility data. The state may need to change the issuance schedule depending on when the plan is approved. The tentative approach is as follows:

Major Milestone	Estimated Completion Date
Delivery of demographic file from DOE	01/20/2021
P-EBT State Plan Approval	02/01/2021
Delivery of first data file from DOE (September 2020 – December 2020 data)	02/05/2021
Public communication campaign begins	02/12/2021
Completion of modifications to P-EBT System – if needed	02/12/2021
Opening of PEBT Address Portal	02/17/2021
Completion/Approval of Conduent Change Order	02/26/2021
Testing of P-EBT System (to Include Testing with Conduent) – if needed	02/26/2021
Delivery of second data file from DOE (January 2021 – February 2021 data)	03/15/2021
Processing of Benefits for SNAP and Non-SNAP Households (September 2020 – December 2020)	03/30/2021
Processing of Benefits for SNAP and Non-SNAP Households (January 2021 – February 2021)	04/30/2021
Delivery of third data file from DOE (March - April 2021)	05/15/2021
Processing of Benefits for SNAP and Non-SNAP Households	05/30/2021
Delivery of fourth data file from DOE (May – June 2021)	07/15/2021
Processing of Benefits for SNAP and Non-SNAP Households	07/30/2021

Beginning in March, by the 10<sup>th</sup> day of the month following each two-month increment, all eligible school districts will provide DOE with the necessary data to issue P-EBT. This data includes the list of students eligible for free and reduced-price meals and their virtual attendance (number of days eligible each month and number of cumulative days of eligibility for the 20-21 SY). DOE will transmit the data file by the 15<sup>th</sup> of the month following each two-month batch. The goal is to begin transmitting the P-EBT benefits by the 20<sup>th</sup> (approximately 5 days after receiving data from DOE) to the state’s EBT processor, Conduent. This allows for the necessary data clean up and staggered benefit issuance. South Carolina issues SNAP benefits on a staggered issuance schedule beginning on the first and concluding on the 19<sup>th</sup> of every month. Staggered issuance for P-EBT would transpire between the 20<sup>th</sup> and 30<sup>th</sup> of every month.

To lower the number of undeliverable cards, the state plans to provide potential P-EBT households with a web-based Address Portal that will allow parents to confirm/update student address information. The P-EBT Student Address Portal will allow parents to search for their student(s) based on Student Last Name, Date of Birth, Student ID (unique identifier with DOE), school district and school name for the 2020-2021 SY. Once a parent/guardian has located their student(s), they will be allowed to update any address changes that have taken place since the beginning of the 20-21 school year. Returned or undeliverable P-EBT cards will be returned to Conduent and the information will be relayed back to the state for reconciliation purposes.

Based on the previous iteration of P-EBT, South Carolina discovered that issuing P-EBT benefits to existing SNAP EBT cards was problematic due to misrepresentation of households regarding non-custodial versus custodial parents. Therefore, for the SY 2020-2021 P-EBT issuance, the state intends to issue new/unique P-EBT cards to all SNAP students. In addition, due to the length of time that has transpired since the last issuance of P-EBT benefits in South Carolina, new P-EBT cards will be issued to families who have already been previously issued a P-EBT card. The state will continue its use of the previously established benefit code (DSEP for non-SNAP) which was created specifically for P-EBT.

For families whose card may be lost or damaged, DSS will be accepting replacement card requests via its Conduent assistance line. South Carolina's P-EBT program will follow the same expungement pattern of benefits as defined for the SNAP program, which is 365 days from issuance date.

## 6. Customer Service

### *Recommended Standard for Household Support*

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

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

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

### **State Response:**

- A P-EBT card along with a notice explaining the P-EBT program will be mailed to the household based on the mailing address listed in the DOE data or validated through the Address Verification Portal.
- Basic EBT usage information will be supplied on a "buck slip" that will be included in the distribution of the P-EBT card. The buck slip will include information such as how the client will PIN the card, what can be bought with P-EBT benefits, what to do if a household does not want the P-EBT benefit, and how to contact EBT Customer Services.

- DSS and DOE will include FAQs and contact information on both agency websites including a brief description of P-EBT, eligibility, frequently asked questions, and instructions for parents who believe their child is currently eligible for free or reduced-price meals and did not receive a P-EBT benefit.
- Flyers will be created explaining what can (and cannot) be purchased with P-EBT benefits. These materials will be distributed (via the South Carolina Retail Association) to grocery stores and retail establishments throughout the state and placed in prominent areas.
- Each agency shall create a specific email/inbox where households may forward questions and concerns and will have staff dedicated to monitoring and tracking the resolution of constituent inquiries. All eligibility issues, questions and concerns, to included but not limited to the number of days a student is eligible per month, will be handled by student's school district with oversight provided by DOE. Questions and concerns related to P-EBT card issuance (to include replacement cards), card access, and timeframes for receiving P-EBT cards will be handled by DSS.
- In instances where DSS is unable to locate a child in their records, the family will be referred to their respective school districts where issues of eligibility can be more easily determined.
- Students not included in original benefit data files provided by DOE or determined to be eligible for P-EBT benefits at a later date, will be referred to their respective school district for verification of eligibility and inclusion in subsequent benefit data files. This process will ensure proper, automated, issuance of P-EBT cards.
- DSS and DOE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with each school district's homeless liaison to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. School districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement. Families will need to sign an attestation that they received the card and at the end of the school year the school district will be required to submit to DSS the signatures and any cards that were not picked up. DSS will continue the collaboration with the Safety and Permanency Division that was established during the first round of P-EBT informing the Office of Economic Services of address/location updates for foster children.
- Public Awareness Campaign: The state will conduct a public information campaign through the use of websites ([www.dss.sc.gov](http://www.dss.sc.gov) and [www.ed.sc.gov](http://www.ed.sc.gov) ) and social media platforms. South Carolina intends to issue a press release in English and Spanish to target state-wide and local news organizations. The state will work with schools and community organizations to push out template emails, robo-calls and text messages.

## **7. Over-issuance of P-EBT benefits**

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

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

### **State Response:**

South Carolina is committed to utilizing the partnership between DSS and DOE to ensure there is no aggregate over issuances or improper payments due to ineligible school status or incorrect student's virtual attendance. The state believes utilizing the most up-to-date student/school information available is essential to avoiding incorrect issuances of P-EBT benefits. South Carolina DSS and DOE will partner to ensure the most up-to-date information is used in the issuance of P-EBT benefits to all eligible students, to include but not limited to, newly eligible, foster children and existing NSLP eligible students from the 2019-2020 school year. Extensive time and resources will be committed to updating and correcting incorrect addresses. The state intends to use a designated web portal to provide an accessible methodology for eligible households to correct/updating old addresses. This methodology will ensure these corrected addresses are not overridden during any data exchange and/or reconciliation process.

## **8. 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.

## **9. 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 of this plan, 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.

**10. 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.”

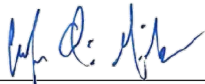
**11. Civil Rights Statement**

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.

**12. 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.

**13. Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials**



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Amber Gillum, Deputy State Director, Economic Services  
South Carolina Department of Social Services



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Molly Spearman, Superintendent  
South Carolina Department of Education

**14. Date of Request: January 21, 2021**