

Amended State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

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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 children in schools or child care during school year (SY) 2021-2022. (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), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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 is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

1. State Vermont:

- 2. Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021;
American Rescue Plan Act of 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).

- 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. 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. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

Response:

The date range for this plan is September 2021 through June 2022². 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 following plan estimates are based on currently available data and information. Vermont anticipates that far fewer children will be eligible for P-EBT this school year due to the shift to in-person learning.

The State of Vermont publishes data and information about COVID-19 transmission in Vermont schools.³ According to this data, from the time period August 23 through January 10, there have been a total of 3,610 positive COVID cases in Vermont schools, or on average 688 new cases per month (3,610 cases/21weeks*4 weeks in one month). Per the Vermont Department of Health, each COVID-positive case in schools includes on average 26 identified close contacts. If every close contact was a student who contracted COVID-19, this would mean that in one month, 17,878 students could be infected with COVID-19. Approximately 40% of Vermont students are eligible for free/reduced-priced meals. The P-EBT school estimates below are based on 7,151 children (17,878*40%) per month receiving a \$56.80 benefit each month⁴:

- Monthly issuances of \$406,190.32
 - Estimated monthly amount issued to school children in SNAP households is \$121,857.10
 - Estimated monthly amount issued to school children in non-SNAP households is \$284,333.22
- Total issuance of \$4,061,903.24 (monthly estimate multiplied by 10 months of payments during the school year)
 - Estimated total amount issued to school children in SNAP households is \$1,218,570.97
 - Estimated total amount issued to school children in non-SNAP households is \$2,843,332.27

For the childcare benefit, Vermont estimates 7,236 children are eligible each month. At an estimated P-EBT benefit of \$31.24 per month, this equals:

- Monthly issuance of \$226,052.64
- Annual issuance of \$2,260,526.40

² August 2021 was part of Vermont's 2020-2021 summer P-EBT plan.

³ <https://www.healthvermont.gov/sites/default/files/documents/pdf/COVID19-Transmission-Schools.pdf>. Please note that due to changes in testing and contact tracing in schools, the [COVID-19 Cases in Schools While Infectious](#) report will no longer be updated after Jan. 10, 2022.

⁴ The \$56.80 monthly benefit amount is based on an estimate. Final P-EBT monthly benefit amounts will be calculated pursuant to the methodology outlined in Section 6. Benefit Levels and posted online on ESD's P-EBT website <https://def.vermont.gov/esd/covid19/P-EBT>

4. P-EBT for School Children (see Q&As #6-24)

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 2021-2022, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application **and** the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals⁵? 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 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.

⁵ The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

Response:

The following two state agencies are responsible for the administration of P-EBT:

- Agency of Human Services, Department for Children and Families, Economic Services Division (ESD), which is responsible for the issuance of P-EBT benefits, P-EBT cards, P-EBT replacement cards, notices to customers and customer service and support as well as creating a P-EBT data template for schools to report information.
- The Agency of Education (AOE), in collaboration with local school districts, is responsible for eligibility determination through the direct certification process, the NSLP application process and monitoring and collecting of P-EBT student eligibility information.

Vermont made the decision in the first P-EBT plan year (2019-2020) to work with local school districts to identify children eligible for P-EBT rather than request that households apply for P-EBT benefits. This decision has resulted in fair and equitable access to P-EBT benefits to all eligible children in Vermont. We know that far fewer households would be served and far fewer children fed if the burden to apply for P-EBT was placed on families. This administrative decision further supports the goal of P-EBT which is to support families by providing food benefits for children eligible for free/reduced-priced meals who have missed meals at school due to disruptions in learning caused by the pandemic.

The COVID-19 pandemic continues to evolve in terms of its impact on school operations and children's learning. In the first school year of the pandemic, all children in Vermont schools transitioned to remote learning in March 2020 through the end of the 2019-2020 school year. In the second school year of the pandemic, children learned in a variety of different models, including in-person, hybrid and remotely. As we are now in the third school year of the pandemic, priority has been placed on in-person learning with the goals of protecting children's mental health, nurturing their emotional and social maturity as well as providing a richer and more meaningful learning experience compared to virtual instruction.

The decision to prioritize in-person learning for the 2021-2022 school year also impacts how Vermont administers its P-EBT program and means that AOE and ESD will be asking schools for different data and information to determine eligibility for children than we did in the first two years of offering P-EBT benefits. The ability to collect data from schools about children eligible for P-EBT is cornerstone to the administration of the program.

Data requests to schools for purposes of administering P-EBT are new requests each school year for information that schools are not already collecting. Schools in Vermont track all student absences. School data systems are not designed to collect and report individual reasons for student absences. To be able to respond to P-EBT data requests, schools manually track the newly requested information on an individual student basis using a provided spreadsheet template for purposes of reporting P-EBT eligibility. This is but one more request, in addition to the multiple COVID-related data requests, procedures, new initiatives and protocols the State has tasked with schools for purposes of supporting children and families and ensuring that students learn, thrive, and are safe and healthy. The ability to rely on simplifying assumptions

in terms of collecting information from schools as well as to establish and pay P-EBT benefit amounts is critical to the ability of Vermont to continue to offer P-EBT this school year.

To that end, Vermont proposes to issue one statewide P-EBT benefit amount for children in schools (See Section 6. Benefit Levels for details about this benefit amount and simplifying assumptions) to children each month who:

- Are eligible for free/reduced-priced meals in that month and
- Have a qualifying COVID-related absence in that month.

AOE will instruct school districts to provide ESD (via a data upload to AOE) with a monthly list of all students eligible for free and/or reduced priced meals who qualify for P-EBT based on having a “COVID-related absence” that month.

Only children attending schools or sites that participate in the national school lunch program are eligible for P-EBT.

Free/Reduced-Priced Meals Eligibility

Free/reduced-priced meals eligibility status will be based on 2020-2021 eligibility information unless an application or new direct certification information has been received for that student in school year 2021-2022. 2020-2021 eligibility information is based on 2019-2020 information unless new applications or direct certification was received in 2020-2021. In that case, the most recent information will be used. Schools will be instructed to remove any students who have graduated, transferred or otherwise un-enrolled since school year 2020-2021. This is consistent with how the state has been instructing schools to treat free and reduced meal eligibility for all other purposes this year. All students, including newly enrolling students, were offered applications at the beginning of the school year. Because the state did not have an approved P-EBT plan at the start of the school year, schools will be instructed that any application approved at any point during SY21-22 should make the child retroactively eligible for P-EBT back to the start of the school year.

COVID-Related Absence Simplifying Assumption

AOE will provide guidance, along with training and technical assistance, to schools on the definition of a COVID-related absence, which will include absences from school for any of the following reasons:

- COVID-positive illness,
- Identified close contact with a COVID-positive individual⁶,
- Other illness with identified COVID symptoms, prompting the need to quarantine and/or test for COVID, or
- Unplanned classroom, grade or school closure due to COVID, including positive cases, staff shortages as a result of COVID, etc.

⁶ Please see information below about Vermont’s test-to-stay initiative which will reduce the number of close contact COVID-related absences.

Schools will be instructed not to report any identifying personal health information about individual students, staff or any other person. For the purposes of P-EBT, private schools that administer NSLP will also be instructed to track whether any student has a COVID-related absence each month.

Vermont schools are in the process of implementing a test-to-stay process. Students identified as a close contact of a COVID-positive person will take a rapid COVID test in the morning before entering the school building. If the test is negative, the student can enter the school building and attend school that day. If the rapid test is positive, the student will be sent home to quarantine and take a PCR test. Implementation of a test-to-stay process in schools will reduce the number of COVID-related absence days and allow children to continue in-person learning. The test-to-stay process will also reduce the number of children eligible for P-EBT because children will be in school and receiving meals at school during the school day.

Please see the Section B. School Status, which details how schools will be required to track the required minimum five consecutive day school closure/reduced attendance period that will trigger the school status requirement.

Schools in Vermont do not have the system capabilities or infrastructure to report individual student-level detailed absence day information that includes the corresponding reason for each day of absence each month, including whether each absence day was a COVID-related absence. Schools have told AOE that they are unable to track this level of detail, and most schools have not tracked this level of detail going back to the start of the school year. Schools do have the capacity to track whether individual students had at least one COVID-related absence day per month, which will form the basis for simplifying assumptions in this plan in the Benefit Level section of this plan.

Public school food authorities (SFAs) each have an identified COVID-coordinator who is responsible for contact tracing, testing, and other COVID health responsibilities. This person will assist the determining officials in identifying which students had COVID-related absences each month.

Proposed Issuance Schedule

Vermont intends to issue P-EBT retroactively in two rounds. September-January benefits will be issued together, followed by February-June. These months may be adjusted according to plan approval. ESD and AOE will request that school districts to provide a template spreadsheet showing all eligible children, indicating the months in which they were eligible, on a schedule determined by ESD and AOE. The first reporting period may be delayed pending USDA approval of the state plan.

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.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response:

AOE will instruct schools that students are only eligible for P-EBT once the school has been closed or had reduced attendance for five consecutive days or more. The first day of the first five-day minimum closure/reduced-attendance episode will be the effective date that the school meets this school status requirement. Schools will be instructed to determine what their first date of eligibility was for each school building, and to only report eligible students who had a COVID-related absence on or after that date. Upon submitting their list to the state agency, the SFA is indicating that the students listed are eligible for P-EBT because they had a COVID related absence occurring on or after the date that the school became eligible and they were also eligible to receive free and reduced meals.

5. P-EBT for Children in Child Care (see Q&As #25-33)

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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).
- 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 two state agencies are responsible for the administration of P-EBT for children in childcare:

- Agency of Human Services, Department for Children and Families, Economic Services Division (ESD), which is responsible for the issuance of P-EBT benefits, notices to customers and customer service.
- The Agency of Education (AOE) is responsible for monitoring and collecting Child and Adult Care Food Program (CACFP) data to inform the P-EBT benefit amount and ongoing eligibility.

AOE collects and monitors CACFP meal data served in childcare settings. Programs have 60 days following the end of each month to submit claims for CACFP meals. Vermont proposes using the most current CACFP lunch meal data available for childcare settings to determine both whether Vermont is able to issue childcare P-EBT benefits that month (i.e. if the 2021 data shows a decrease in the number of meals served compared to the same month in 2019) and also to set the childcare P-EBT benefit amount.

For the benefit amount, Vermont proposes to use the percentage reduction of CACFP lunch data compared to 2019 as the basis of a childcare P-EBT benefit amount. This monthly benefit amount assumes an average 17.5-day monthly attendance in childcare (175 school days required each school year/10 months). Currently, CACFP data available for the 2021-2022 plan year is September through December. The average reduction for this time period in CACFP lunches served by family day care homes and childcare centers (excluding at-risk lunches) is roughly 26%. This number may change slightly; Vermont is currently working with USDA to revise lunch claims for a couple of months. The state will multiply this percent reduction in claims by the 17.5-day monthly attendance figure and the \$7.10 benefit per day to arrive at a monthly P-EBT childcare benefit. The monthly benefit for February – June will be based on the reduction in CACFP lunches for January – March 2022 compared to the sum of CACFP lunches in January-February 2020 and March 2019, which will be calculated in early July 2022.

Vermont commits to updating USDA each month on:

- whether Vermont is eligible to issue childcare P-EBT benefits based on whether the most current CACFP data available as of the end of each benefit month shows a reduction in the number of meals served in childcare settings compared to the same month in 2019; and
- the childcare P-EBT benefit amount for that month based on the most recently available data.

As another simplifying assumption, Vermont proposes that for each month that CACFP data shows an overall reduction in the number of meals served in childcare settings, all children in Vermont under 6 years of age as of September 1, 2021 and in a household receiving SNAP benefits at any time during the plan period September 1, 2021 through June 30, 2022 will be eligible for the childcare P-EBT benefit for that month. ESD will determine and confirm a child's receipt of SNAP benefits in accordance with the relevant SNAP privacy requirements through the use of the State's eligibility system.

Vermont is a small state comparatively in terms of both area and population⁷ and is composed almost primarily of small towns and villages separated by mountains. Because of the rural nature of the state, many Vermont families commute to other towns and counties for employment and/or childcare. Vermont proposes that the State of Vermont is considered an “area” for purposes of making the determination that one or more childcare facilities have closed or operated with reduced attendance or hours each month for purposes of determining eligibility. Relying solely on county-level CACFP data for purposes of determining eligibility for households receiving childcare P-EBT benefits would unfairly impact many eligible families who reside in one county but send their children to childcare in other towns and counties. In addition, relying on CACFP sponsor address data in terms of determining eligible regions is problematic because sponsor and sub-state level data are not aligned in terms of address information. The address of a childcare sponsoring organization may not be in the same town or county as the centers or day care homes under that sponsor. Therefore, using the State of Vermont is the best proxy for making this determination.

Finally, the state proposes the reliance on the most recent CACFP data available which shows an approximate reduction of 26% in the number of lunches served compared to pre-pandemic numbers in the same month meets the reduced attendance/closure threshold requirement of five consecutive days.

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

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-2021-07-16/pdf/2021-15107.pdf>

⁷ Vermont’s population from the most recent 2020 census report is 643,077.

- 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:

Vermont AOE’s Data Management & Analysis Division will be calculating the average length of COVID-related absences from a sample of Supervisory Unions and Districts. The sample will include at least 7 schools across two SFAs, including students from grades PreK-12, and representing approximately 4% of the children enrolled in schools participating in the NSLP in Vermont. The approach for averaging the COVID-related absences will weight the Supervisory Unions and Districts in the sample by enrollment. The state agency will develop a single average monthly benefit using available data over a period of multiple months. At the time of plan submission, Vermont AOE’s Data Management & Analysis Division has not yet finished calculating the average absence length. The calculation will be made using the above methodology. The state agency will conduct the same calculations at least every two months for the remainder to the school year to determine if the benefit amount should be modified for future months.

Vermont is taking this approach to calculate an average benefit because most Vermont schools have not tracked individual absence data in a way that is easy to extract and use to calculate and average absence length. After outreach to Vermont schools to determine what data could be gathered, AOE has found only these two SFAs gathered data in a readily usable format. Requesting similar data from more SFAs is not possible at this time due to the intense staffing shortages and additional administrative work associated with the Omicron variant. Vermont AOE’s Data Management & Analysis Division has stated that the available data, representing 4% of the children enrolled in schools participating in the NSLP in Vermont, is an appropriate sample size to calculate a state-wide average.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 2020-2021, 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 2020-2021. 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 2020-2021, 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:

Vermont's issuance schedule will be determined after plan approval and will be shared with USDA, posted on the ESD P-EBT website and messaged to households and the public.

The tentative plan is as follows:

Day 1 – Plan approval is received

Day 2 – Inform school districts of the reporting criteria and submission instructions

Days 2 – 30 AOE and ESD training and technical assistance to schools, communication campaign

Day 45– Schools report data on P-EBT eligible children for the period September through January

Days 46 – 74 – ESD and AOE data integrity and payment file work

Day 75 – First round of P-EBT benefits issued (September - January)

For ongoing issuance, the State intends to issue P-EBT benefits on a retroactive basis, schedule to be determined after plan approval. **In addition, the State will de-duplicate children from the childcare P-EBT benefit list who have already received P-EBT school benefits for each corresponding month.**

The State intends to follow the same distribution model utilized in previous iterations of P-EBT. SNAP (3SquaresVT) households will receive their P-EBT benefits on their EBT card, while non-SNAP households will receive benefits on a unique P-EBT card. P-EBT benefits will follow the same expungement rules that SNAP follows in Vermont. New P-EBT cards will be issued to non-SNAP families for the 2021-2022 school year.

Vermont will continue to use the FSM benefit code for non-SNAP PEBT and the SSFB benefit code for SNAP PEBT. P-EBT in Vermont is spend/draw priority 1.

Returned P-EBT cards are sent to Vermont DCF's EBT unit, where they are logged. In cases where a forwarding address is provided, ESD will update its files and forward the P-EBT card and correspondence to the new address. In cases where customers call ESD to report changes of address, ESD will update its records and forward the returned mail to the correct new address.

8. Customer Service

Recommended Standard for Household Support

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

1. USDA strongly encourages States to provide a means to resolve disputes and answer 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 and caregivers 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 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 over the past year, 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:

Communication: ESD and AOE will have a multi-faceted approach to ensure robust communication to all eligible households. ESD has a benefit service call center, which has its own dedicated P-EBT option. The State will conduct a public awareness campaign, working with schools, outreach partners and social media, including issuing a press release, posting information on-line and answering frequently asked questions. ESD and AOE will also work with schools to send out direct communications to eligible families.

The State will communicate P-EBT issuance schedules with retailers and Vermont's retailers' association. The State will also consider SNAP and SNAP emergency allotment issuance schedules when planning P-EBT issuances.

Customer Service: During plan year 2020-2021, ESD and AOE worked with local schools to establish clear roles and responsibilities in addressing questions about P-EBT benefits and eligibility. This process resulted in efficient and comprehensive solutions to inquiries and questions and ensured

that families and households received resolution to each question and/or complaint. This process for communication and customer service will continue in the 2021-2022 plan year. As part of this process, any household who did not receive a P-EBT benefit for any month for which they thought eligible will be directed to contact the dedicated ESD P-EBT hotline. ESD will work with local schools and AOE to confirm P-EBT eligibility and issue benefits, if eligible. Households dissatisfied with the response have the option to request a fair hearing.

ESD will have a database of eligibility information, reported to ESD by school districts, which ESD P-EBT staff can access to allow staff to specifically investigate a child's P-EBT eligibility, benefit amounts and card issuance status. Additionally, inquiries from ESD P-EBT staff may be sent to a specific email inbox for further review and resolution.

Equitable Access: ESD and AOE are committed to equitable access for all eligible families. The fact that Vermont works with schools to identify and provide P-EBT benefits to all eligible families rather than requiring families to apply for P-EBT benefits ensures equal access to the program.

Families Experiencing Homelessness: Since the beginning of the pandemic, ESD has operated a general assistance housing program providing motel rooms to applicants, with relaxed eligibility rules, to ensure that families experiencing homelessness have a safe and reliable place to stay during the pandemic in a non-congregate setting. As a result, ESD has address information for many families experiencing homelessness in Vermont. In addition to this resource, ESD and AOE will work with school homeless liaisons to ensure that families receive their P-EBT benefits. ESD will also continue the collaboration with DCF's Family Services Division to determine current address, custodian, etc. of children in foster care. The State is also committed to serving all eligible children regardless of primary language. The ESD call center has translation services available for families calling in with questions about P-EBT benefits. ESD posts translations of P-EBT information and frequently asked questions on its website and works with schools to translate letters and other communications for households.

9. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to

recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

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

Please describe how your State will manage P-EBT payment errors.

Response:

ESD and AOE are committed to working with schools to ensure that ESD has current information about eligible families. To that end, upon plan approval, ESD and AOE will work with school districts on communications to families about P-EBT benefits and how to ensure that school districts have current information.

ESD is committed to thoroughly researching P-EBT cases to ensure that benefits reach eligible children. AOE will dedicate at least one FTE to assist in communications with school districts in addition to assisting in researching complex cases. In addition to receiving current information from schools, ESD also has the roster of eligible children with corrected addresses and other information from the prior school year that can be used as a reference. ESD and AOE are further committed to working directly with schools when there are questions. ESD commits to reporting improper payments to USDA.

10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30 2022. 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.

12. Release of Information

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

13. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

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

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



Mary Rose Krueger
State Director of Child Nutrition Programs
Vermont Agency of Education

Leslie Wisdom

Leslie Wisdom
Food and Nutrition Program Director
Vermont Department for Children and Families
Economic Services Division

Date of Request March 24, 2022