

State Plan for Pandemic EBT (P-EBT)

The contents of this 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.

- 1. Type of Request:** Initial
- 2. Primary Citation:** Families First Coronavirus Response Act
- 3. State:** Vermont

4. Proposed Alternative Procedures:

The State proposes to provide P-EBT benefits to SNAP and non-SNAP households with children who have temporarily lost access to free or reduced-price school meals due to pandemic-related school closures. These households are eligible for P-EBT because they:

- Include an eligible child or children, who if not for the closure of their school during a public health emergency designation and due to concerns about a COVID-19 outbreak, would receive free or reduced-price school meals under the Richard B. Russell National School Lunch Act, as amended, and
- The child's school or district will be (or has been) closed for at least 5 consecutive days during a public health emergency designation and due to concerns about a COVID-19 outbreak.

The household allotment amount will be no less than the value of school meals at the free rate over the course of five (5) school days for each eligible child in the household. The value of the school meals is equal to the Federal reimbursement rate for breakfast and lunch at the free rate, as specified by USDA.

Verification of P-EBT Eligibility:

The Vermont Department for Children and Families Economic Services Division will utilize a file provided by the Vermont Agency of Education (AOE) that contains a list of children who received free or reduced lunch across the entire state of Vermont. This list will include all students that receive free and reduced-price school lunch including those that receive meals at a participating non-public school, CEP, or Provision 2 school. Benefits will not be provided to school-aged children in a SNAP household that do not participate in the national school lunch program.

The AOE file will contain the following fields:

- Head of Household First Name
- Head of Household Last Name
- Head of Household Street Address
- Head of Household City
- Head of Household State
- Head of Household Zip Code
- Child's First Name
- Child's Last Name
- Child's Date of Birth

This data will be matched to active SNAP households on child's last name, child's first name, and child's date of birth. Any children in a SNAP household that do not match the file form AOE will be manually reviewed and researched. If the AOE head of household matches the SNAP head of household and the case has an active EBT card, the P-EBT benefit will be issued to that card. If the case does not have an active EBT card, a P-EBT card will be requested and the P-EBT benefit will go to that card. If the AOE head of household is not the SNAP head of household, a P-EBT card will be requested for the AOE head of household and the P-EBT benefit will go to that card. If no match can be found after review, a P-EBT card will be issued to the AOE head of household and the P-EBT benefit will be issued to that card.

AOE will provide ESD with a list of students that became eligible for free and reduced lunch between 4/1/20 and 4/10/20 that were included in the original data submission. ESD will process benefits for these students based on the date they became eligible for free and reduced lunch.

Schools are continuing to receive and process free and reduced meal applications. For students that are found to be eligible for free and reduced lunch between April 10th and June 19th, after the student file is provided by AOE, the determining official will copy DCF on the letter to the household approving free and reduced eligibility. This letter will qualify the student for the P-EBT benefit. Benefits to these students will be paid in separate benefit runs on 6/10/20 and 07/17/2020. AOE has advised schools to include the same data elements in the letter that were on the electronic file as to provide enough information to process the benefit. Households that do not receive a P-EBT benefit and believe they should be eligible will be asked to submit a copy of the school lunch eligibility letter. These letters will be reviewed and benefits issued in the same manner as those that become eligible for free and reduced lunch after April 10th.

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.”

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

Calculation of Household Allotments:

Per verbal guidance, the combined daily value for breakfast and lunch in Vermont for the purposes of P-EBT will be \$5.70.

Calculations for each meal:

Daily total: \$5.70

Current number of school days cancelled:

The governor ordered the closure of Vermont schools on March 18th. On March 26th the closure order was extended to the end of the school year. The average date that schools will

close for the school year is June 19th. The total number of days school will be closed in Vermont is 10 in March, 22 in April, 21 days in May and 15 days in June for a total of 68 school days.

March through June benefit calculation, per student:

Multiplying the daily value of school meals (\$5.70) by 68 (cancelled school days): = \$387.60 in benefits per student.

Total number of children estimated to receive P-EBT benefits:

38,000 statewide

Total estimated P-EBT issuance:

Vermont estimates the total value of P-EBT benefits issued will be \$14,728,800 (38,000 students * \$387.60 per student).

Issuing P-EBT Benefits to Households:

Vermont will be issuing benefits outside of the normal eligibility system. As a result, Vermont is prepared to issue benefits in a one-time lump sum approach to all households for the entire school closure period.

Vermont will send a benefit issuance file to FIS on a daily basis beginning on May 8th. 4,000 households will be sent to FIS each day until all households have been issued a benefit. Households will be sent in alphabetical order by head of household last name, first name. Both SNAP households and non-SNAP households will be processed this way.

For SNAP households Vermont will issue the benefit on the households EBT card.

For non-SNAP households, an EBT card will be generated in Vermont and sent to the head of household with instructions on how to use the card and information on the benefit that is being provided.

P-EBT benefits will have their own benefit type and will be assigned a spend priority of one. Expungements for both SNAP and non-SNAP households will occur according to the normal SNAP expungement rules.

Replacement Cards:

Replacement cards for non-SNAP households will be available as follows:

- The household calls the State's EBT Processors (FIS) helpdesk (number on back of card 1-800-914-8605) OR the State of Vermont's ESD Benefits Service Center (1-800-479-6151) to request a replacement card.
- The EBT processor or EBT Unit cancels the card and issues a replacement card.
- The EBT Unit prints the replacement card the next business day from when it was requested/issued.

Returned Mail Procedure:

P-EBT cards that are returned in the mail will be handed as follows:

Returned EBT cards will be secured by BGS in the State's EBT Lockbox in the WSOC mailroom. The EBT Unit follows the "DCF_EBT_Returned_Cards" Standard Operating

Procedure which is attached and briefly outlined below:

- The returned card gets logged into a tracking sheet
- EBT Specialist checks ebtEDGE to see if the address has been updated.
 - If NO - card gets shredded, card status in ebtEDGE gets changed to “BAD ADDRESS”
 - If YES - card is reissued to the updated address

Non-SNAP Household Contacts ESD’s Benefits Service Center Reporting Card not Received:

- ESD reviews list of non-SNAP households to validate that household is on the list, checks the address on file and documents the updated address from household if required.
- Supervisor will alert the EBT Unit via the email helpdesk of the new address or potential issue with card issuance.
- The EBT Unit cancels the card and issues a new EBT card which will print the following business day.

P-EBT Timeline:

<u>Date</u>	<u>Activity</u>
4/17/2020	Receive file of students receiving free and reduced lunch from AOE
4/24/2020	IT completes systematic clean-up of data file from AOE
5/1/2020	ESD staff complete manual review of questionable data files
5/11/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/12/2020	EBT cards printed and mailed to households from 5/11/20 file sent to FIS
5/12/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/13/2020	EBT cards printed and mailed to households from 5/12/20 file sent to FIS
5/13/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/14/2020	EBT cards printed and mailed to households from 5/13/20 file sent to FIS
5/14/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/15/2020	EBT cards printed and mailed to households from 5/14/20 file sent to FIS
5/15/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/18/2020	EBT cards printed and mailed to households from 5/15/20 file sent to FIS
5/18/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/19/2020	EBT cards printed and mailed to households from 5/18/20 file sent to FIS
5/19/2020	Benefits information sent to FIS for 4,000 SNAP and Non-SNAP families
5/20/2020	EBT cards printed and mailed to households from 5/19/20 file sent to FIS

Communication Strategy:

Vermont will conduct a public information campaign to alert those receiving the P-EBT benefit the purposed of the benefit and how it can be used. This will include positing information on the VT DCF website, social media, press releases and notifying community partners. For non-SNAP households, the EBT card mailing will include a letter explaining the benefits are non-transferable and how to dispose of the EBT card if they do not wish to use the benefit. Non-SNAP households will also receive and a brochure explaining how to use the EBT card.

Other Requirements: none

All P-EBT benefits will be delivered on an EBT card, and the State hereby confirms that it has sufficient card stock on hand to successfully begin operations for the number of households estimated below.

The State should conduct a public information campaign to alert those receiving benefits the purpose of P-EBT and how it is to be used.

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

In addition, the State agency will submit monthly reports to FNS with the following information for the entire State:

- The value of the P-EBT benefits issued to SNAP and non-SNAP households, separately identified.
 - Within SNAP households, the data must differentiate between base SNAP benefits and P-EBT benefits
- The average P-EBT issuance amount per household for SNAP and non- SNAP households, separately identified.
- The number of SNAP households issued P-EBT and the number of non- SNAP households issued P-EBT

5. Justification for Request: Coronavirus COVID-19

Affected Caseload: One day estimates for existing SNAP households under these procedures:

- Number of households receiving P-EBT benefits: 8,660
- Number of children receiving P-EBT benefits: 14,800
- Amount of P-EBT benefits to be issued: \$84,360

One day estimates for those non-SNAP households/children who will receive P- EBT under these procedures:

- Number of households receiving P-EBT benefits: 13,600
- Number of children receiving P-EBT benefits: 23,200
- Amount of P-EBT benefits to be issued: \$132,240

6. Anticipated Implementation Date:

- Benefits will be issued beginning on 5/11/2020.

7. Signature and Title of Requesting SNAP and Child Nutrition State Agency



Signature

SEAN BROWN, DEPUTY COMMISSIONER

Print Name and Title



Signature

Mary Rose Krueger, State Director of Child Nutrition Programs

Print Name and Title

Date of Request: 5/4/2020