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MANDY COHEN, MD, MPH · Secretary

 $\ensuremath{\text{SUSAN OSBORNE}}$ \bullet Assistant Secretary for County Operations for Human Services

Date: February 16, 2021

Attention: Food and Nutrition Services Managers and Supervisors

Subject: Pandemic EBT Card Issuance for School Year 2020-2021

Priority: Information and Action

Dear County Directors of Social Services:

I. GENERAL INFORMATION

The Families First Coronavirus Response Act; Consolidated Appropriations Act, 2021 provides the Secretary of Agriculture authority to approve State agency plans to provide Pandemic Electronic Benefits Transfer (P-EBT) benefits for eligible school children during the school year 2020-2021. P-EBT provides benefits to households with children who would normally receive free or reduced-price meals under the Richard B. Russell National School Lunch Act, if not for school closures and remote learning. The North Carolina Department of Health and Human Services (DHHS) in collaboration with the North Carolina Department of Public Instruction (DPI) has submitted a plan and received approval from the United States Department of Agriculture (USDA) to implement P-EBT for school year 2020-2021.

II. POLICY PROCEDURES

A. Eligible Children:

The State proposes to provide P-EBT benefits for the months of August 2020 through June 2021 to Food and Nutrition Services (FNS) and non-FNS households with one or more children in their household who meet the following two conditions:

- The child would be eligible for free or reduced-price meals if the National School Lunch Program (NSLP) and School Breakfast Program were operating normally. This includes children who are:
 - a. Directly certified or determined "other source categorically eligible" for NSLP during school year 2020-2021; **or**
 - b. Certified through submission of a household application processed by the child's school district for NSLP during school year 2020-2021; **or**
 - c. Enrolled in a Community Eligibility Provision (CEP) school or a school operating under Provisions 2 or 3; **or**

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF SOCIAL SERVICES • ECONOMIC AND FAMILY SERVICES

LOCATION: 820 S. Boylan Avenue, McBryde Building, Raleigh, NC 27603 MAILING ADDRESS: 2420 Mail Service Center, Raleigh, NC 27699-2420 www.ncdhhs.gov • TEL: 919-527-6300 • FAX: 919-334-1265

- d. Directly certified, determined other source categorically eligible or certified by application for NSLP in the school year 2019-2020 **and** has not been determined eligible or ineligible for NSLP in the 2020-2021 school year.
- The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced in-person attendance or hours for at least 5 consecutive days in the current school year. Once the minimum five (5) consecutive days threshold is met, children are eligible to receive P-EBT benefits for closures or reduction of in-person hours for the entire 2020-2021 school year.

B. Household Selection:

To identify eligible school children and confirm their eligibility, North Carolina (NC) will utilize files from DPI that contain all students that are:

- Eligible for free or reduced-price meals during the 2020-2021 school year by the way of NSLP application, direct certification, categorical eligibility, or carry-over eligibility from the 2019-2020 school year; and
- All children who attend Community Eligibility Provision (CEP) schools.

Students who have graduated, been determined ineligible for the NSLP, or moved out of district will be removed from this list. The list will include charter school data if the charter school participates in free and reduced priced meals. The list will not include homeschooled children.

CEP is a non-pricing meal service option for schools and school districts in low-income areas. CEP allows the nation's highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications.

There is no application for NC P-EBT benefits. P-EBT eligibility information for the 2020-2021 school year comes from the Department of Public Instruction based off enrollment in free and reduced-price meals at schools participating in the National Free and Reduced Lunch Program at the time of P-EBT, and the schools that experienced closure or operated with reduced in-person attendance or hours for five (5) consecutive days within the 2020-2021 school year due to COVID-19. DHHS will continue to work with DPI to identify as many eligible families as possible within the time frames established by USDA to administer the P-EBT benefits.

C. Learning Modes:

To ensure that we are providing consistent benefits, each eligible student will be classified in one of three learning modes. The learning mode will determine the P-EBT benefit level issued each calendar month.

1. In-Person Learning mode: The student is attending school in-person 100% of the time. 2. Remote Learning mode:

The student is enrolled in a school operating under a 100% remote learning mode in the calendar month or the parent has made the choice to place the child in 100% remote learning. Note: Greater than or equal to 17 school days remote in a month will also be considered 100% remote (see Remote Learning Mode Benefit Level below).

 Hybrid Learning mode: The student is attending school with any combination of in-person and remote learning.

D. Benefit Levels:

In an effort to structure the program in a way that is easier to manage and more easily communicated to clients and stakeholders, North Carolina will issue P-EBT benefits in two distinct amounts, one amount for students enrolled in a fully remote learning mode and one amount for students enrolled in a hybrid learning mode.

In-Person Learning mode:

These students will not receive allotments for P-EBT benefits as the program is designed to help feed children not afforded the opportunity to receive free and reduced lunches at school during the day.

Remote Learning Mode Benefit Level:

North Carolina determined that there is a total of 185 instructional school days per year. When averaged over an 11-month school year, that equals to an average of 17 instructional days per month. A student in a fully remote learning mode will receive P-EBT benefits for the calendar month equal to the daily reimbursement rate of \$6.82 multiplied by 17 days or \$115.94 per month.

Hybrid Learning Mode Benefit Level:

The hybrid learning mode will be based on a statewide average of the number of days spent in remote/virtual learning during the month by students in schools operating under hybrid schedules. The P-EBT benefit level for each month will be the average number of days in the remote/virtual learning through schools operating in a hybrid learning mode multiplied by the daily reimbursement rate of \$6.82.

Examples: If the month of March contained a statewide average of 9 remote

instructional days for hybrid school students, the benefit amount for the month will be \$61.38.

If the month of April has a statewide average of 6 remote instructional days for hybrid school students, the benefit amount for the month will be \$40.92.

SY 2020-2021 July 1, 2020 – June 30. 2021		Free Reimbursements USDA School Meal Programs		
	Lunch	Breakfast	Snack	Daily Total
Contiguous U. S.	\$3.60	\$2.26	\$0.96	\$6.82

Month	Remote Learning Benefit Amount (17 days)	Statewide Avg Days For Hybrid Students	Hybrid Learning Benefit Amount
August	\$115.94	9	\$61.38
September	\$115.94	9	\$61.38
October	\$115.94	9	\$61.38
November	\$115.94	9	\$61.38
December	\$115.94	9	\$61.38
January	\$115.94		*TBD
February	\$115.94		*TBD
March	\$115.94		*TBD
April	\$115.94		*TBD
May	\$115.94		*TBD
June	\$115.94		*TBD

*This is based on the actual state monthly average of remote learning days which cannot be calculated at this time.

** Students that already received benefits for August and September in the Fall will receive a small supplemental issuance due to the daily rate increase if they received less than the amount determined by their learning mode.

E. Months of Assistance Tentative Issuance Schedule:

February 2021:

The initial P-EBT multi-month issuance will be staggered over several issuance days (undetermined at this time due to vendor and notice requirements) during the month of February. The initial issuance will be staggered over a 10-day period by issuing one month every other day until all prior months are issued. The initial multi-month issuance will be for the months of August, September, October, November, and December.

March 2021:

March issuance will include the months of January and February 2021. Beginning no later than the 20th of each month, the benefits for each month will be randomly generated and issued every other day over a 10-day period.

April 2021 and Ongoing Issuances:

P-EBT benefits will be issued retroactively in one-month increments. Beginning no later than the 20th of each month, the benefits will be randomly generated and issued every other day over a 10-day period.

Benefit Month	Issuance Month
August	February
September	February
October	February
November	February
December	February
January	March
February	March

March	April
April	May
May	June
June	July

Newly Eligible Students:

Students that become eligible for NSLP after the initial multi-month issuance will be considered eligible retroactively to August 2020. Their initial issuance will contain all eligible months to date and subsequent benefits will be issued on the monthly cycle.

F. Issuing P-EBT Benefits to Households:

1. Children currently in an active FNS case for one of the P-EBT benefit months:

- The associated NC FAST case numbers for each child/group of siblings will be identified. These FNS cases will receive a supplement based on the household's existing EBT card/account information and the number of children in the household that matched with the DPI file. The total benefits for the month are based on the number of eligible children in the household and the learning mode each child is in that month.
- That file will be submitted to NC DHHS' EBT vendor and the total benefit will be loaded onto that household's existing EBT account. Some households will receive benefits on an existing EBT card and some benefits on a new P-EBT card. The P-EBT benefits cannot be moved to the existing EBT card.

2. Children not in an active FNS case for the given P-EBT benefit month:

- NC DHHS will utilize the data contained in the DPI file to roll confirmed sibling sets and groups of siblings into consolidated "household" records.
- Those household records will then be batched and sent directly to our EBT vendor to create new EBT accounts.
- The calculated benefit amount for the associated benefit month will then be loaded onto the P-EBT cards via a batch file to the EBT vendor.

3. Homeless, Migrant, and Foster Care Children:

The Federal Programs Division of DPI will collaborate with other divisions within the department and DHHS to educate and distribute P-EBT cards for students who are experiencing homelessness, including unaccompanied homeless youth, students in foster care, and students who have been identified as migrant and other students who may need the assistance of a school social worker to help ensure access to P-EBT benefits.

The P-EBT cards for students identified as Foster children will be issued in the student's name and mailed to the local county Department of Social Services associated with the case. These cards should then be distributed to the children's caretakers.

The P-EBT cards for Migrant and Homeless students will be mailed to the address on file with DPI. The homeless liaison will collaborate with the PSU's School Nutrition Department and the local social service agency to assist with address corrections or reissuances, informational literature, and other resources distributed to students, including unaccompanied youth, parent/guardians, school buildings, and local organizations.

4. Example of the P-EBT card.



Note: P-EBT issuances for non-active FNS households will be available in ebtEDGE. This information will not be available in NC FAST.

G. Notices:

There is a combined notice (attached) that will be sent to all eligible children for the 2020-2021 P-EBT program. Two versions of the combined notice will be issued, one for the initial February issuances covering August through December and another for March ongoing issuances. Each child will receive a notice with their first P-EBT issuance. Subsequent and denial notices will not be issued. The notice will include the following information:

- The household's phone number on file with DPI.
- How to activate the P-EBT card.
- How to pin or check the P-EBT card balance.
- Things that can or cannot be purchased with the P-EBT card.
- How the P-EBT card works.
- Households that wish to decline the benefits may simply destroy the cards.
- Expungement of unused benefits will occur at the end of 365 days.
- If they are a current FNS recipient or received P-EBT in the Spring or Fall that the P-EBT benefits will be loaded on the same card that was received during the 2020-2021 P-EBT and that the household may continue to use the same card.
- If the household lost or destroyed their previous card, they may order a new card following the instructions provided on the notice.

H. Activating and Pinning P-EBT cards, Replacing Lost, Stolen or Damaged EBT Cards.

1. Pinning P-EBT cards:

P-EBT cards will have a mailer insert that gives the households instructions on how to activate and PIN their card upon receipt. When activating the P-EBT card the client will be asked for the Date of Birth of their youngest school age child who receives free or reduced lunch. Note: If there are multiple children in the household it may be necessary to try each school age child's date of birth to successfully activate the P-EBT card.

Primary Birth Date (MMDD	2000)*	
01012005		
New PIN *		
Re-Enter New PIN*		
Save		Cancel

This is the screen the clients will see using the mobile app or the cardholder portal.

Example: The household consist of 2 school age children – one is 13 years old (DOB:04/04/2007) and one is 15 years old (DOB: 01/01/2005) and both receive Free or Reduced Lunch. The date of birth used would be the date of birth of the 13-year-old. If that does not work, the date of birth of the 15-year-old should be tried.

2. Replacing Lost, Stolen, or Damaged P-EBT Cards by one of the following methods:

- a. Visiting <u>www.ebtedge.com</u> if they created an account prior to losing or destroying the card.
- b. Using the EBT Edge mobile app (can be downloaded on Google Play or Apple Store) if they registered their phone prior to losing or destroying the card.
- c. Contacting the North Carolina EBT Call Center at 1-888-622-7328 to order a replacement card. Follow the instructions on how to activate and use your new P-EBT card when your new card arrives.

I. Issuance Reports and Undelivered Card Status Report:

NC FAST Reports:

Several P-EBT reports that may assist with troubleshooting will be housed in NC FAST Help. The P-EBT reports will contain a special password that will be provided to counties securely. The reports are as follows:

1. 2021 P-EBT Cases (Monthly and Cumulative)

This detailed report shows the list of students served by month of issuance and contains student level details (name, address, school, case numbers, and benefit amounts)

Note: The information provided on the P-EBT reports is for county use only and cannot be released to callers or to clients who come into the office.

2. School Remote Learning Status Report (Monthly)

This report shows a list of schools and their status of Fully Remote, Hybrid, or Fully In-Person for a given month.

3. Eligible P-EBT Students Not Receiving Benefits Reports (Monthly)

This report shows students who were in the student data file but for who we weren't able to serve for one or more reasons -i.e. missing student calendar file, 100% absent, etc.

4. 2021 PEBT Issuances (By Month and Cumulative)

This report shows total P-EBT cases, total P-EBT participants, and total issuance dollar amounts by county and month.

5. Card Status Report Undelivered County – EBTDS210-4.

The Card Status Report Undelivered County – EBTDS210-4 report is a daily report that lists all EBT cards returned as undeliverable to FIS. <u>https://portal.ebtedge.com/govreports/ReportList.aspx</u> The non-FNS P-EBT cards will also be included on this report.

While counties are not required to work this report for P-EBT undelivered cards, it is strongly recommended that counties use all available reports in NC FAST Help, as well as the toolkits provided to assist customers when they call or visit the office with specific questions regarding P-EBT benefits. This may include updating the customers address in ebtEDGE and reissuing a new card to the household if they indicate they did not receive their P-EBT card because the address on the report is incorrect or has changed. Counties are encouraged to provide the same level of customer service for P-EBT benefits as they do for all other benefits administered through the local DSS agencies. Note: While the county is not required to work this report for P-EBT undelivered cards, the requirement to work this report for regular FNS cases is still in effect.

6. Non-FNS household does not want to participate in the P-EBT program.

Inform the household to destroy the P-EBT card and that the benefits will be available for 365 days. If they change their mind, they may call the call center to request a replacement card at any time prior to the expungement of the benefits. Document on the P-EBT log that the client does not wish to participate and was instructed to destroy the P-EBT card.

7. Toolkit

A toolkit (attached) has been developed to assist county workers and partner agencies in troubleshooting and answering questions. The toolkit includes the following information in both English and Spanish:

- P-EBT Partner Social Media Suggested Posts
- P-EBT Fact Sheet Narrative
- P-EBT Flyer
- P-EBT Frequently Asked Questions (FAQ)
- P-EBT Information Sheet
- P-EBT One Page Infographic
- P-EBT Robocall Scripts
- P-EBT Roles and Responsibilities
- P-EBT Website Content for Partners and Stakeholders

J. Overpayments.

Department of Health and Human Services (DHHS) does not have authority to pursue claims against households or children that were incorrectly issued benefits to which they were not entitled.

DHHS will contact counties in regard to cases where a child's benefits went to the incorrect household. County staff must investigate the case to determine if the children were listed on the household's regular benefits in error. If children were listed on the case in error, only complete a claim of over issuance for regular benefits. Do not include any P-EBT benefits.

When DHHS discovers instances where a child's benefits went to the wrong household or child, DHHS will research those cases individually and issue benefits **only** when the state confirms that its original issuance was made in error.

- An error in issuance will occur only when there is a system issue that resulted in an overpayment.
- Failure to list correct or to update guardian or address information with the local school system does not constitute an error in issuance.
- NC DHHS will not issue duplicate benefits in cases of disputed guardianship if the state believes the original issuance was correct.
- Do not enter P-EBT overpayments into NC FAST.
- If an overpayment is discovered that includes both P-EBT benefits and regular benefits, establish the claim only for the regular FNS benefits and do not include any P-EBT benefits.
- P-EBT overpayments will be determined by DHHS and tracked on a central spreadsheet at the state level.
- Report all county discovered P-EBT Overpayments via <u>dss.pi.questions@dhhs.nc.gov</u>.

III. IMPLEMENTATION INSTRUCTIONS

This policy is effective upon receipt for all active FNS households and all non-active FNS households matched from the Department of Public Instruction. Submit any questions regarding this information to the DHHS Operational Support Team (OST) at DSS.Policy.Questions@dhhs.nc.gov.

Sincerely,

Carled West

Carla West, Senior Director for Economic Security Division of Social Services, Economic and Family Services

CLW/rc

Attachments (4) Initial P-EBT Notice English and Spanish March ongoing P-EBT Notice English and Spanish P-EBT Toolkit English P-EBT Toolkit Spanish

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