

REPORT

Pandemic EBT Implementation Documentation Project

PREPARED FOR

Center on Budget and Policy Priorities
Food Research & Action Center



September 2020



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Acknowledgments

Koné Consulting would like to thank: the Center on Budget and Policy Priorities and the Food Research and Action Center for working tirelessly to reduce food insecurity and hunger in this country, and for inviting us to assist them with this study; USDA Food & Nutrition Service for making Pandemic-EBT possible; and, all of the state officials and school districts personnel in the 52 states and territories who agreed to be interviewed, those who responded to the survey, and all who worked tirelessly over the past six months to implement P-EBT during these unprecedented times in order to reduce hunger and food insecurity in their communities. We would also like to thank American Public Human Services Association, Brookings Institute, the Center for Law and Social Policy, Code for America, the Council of Chief State School Officers, the Education Trust, Hunger Task Force, the Leadership Conference on Civil and Human Rights, the National Association for the Advancement of Colored People, New America, Propel, Share Our Strength, and the Urban Institute for sharing their perspectives or reviewing study materials. This study was conducted expediently to make the information gathered available to policymakers, state officials, and school district personnel who continue to grapple with delivering services to children virtually in the 2020-2021 school year. In a few places in this report we have highlighted areas that are ripe for further study once administrative data on outcomes is more widely available.

Koné Consulting would also like to thank Rachel Cahill of Cahill Consulting for her efforts in bringing this report to life. Rachel is an advocate for individuals and families in need and works tirelessly to address hunger across our country. Rachel has been instrumental in implementing the Pandemic-EBT program in her home state of Ohio. We were fortunate to have Rachel on our team.

Executive Summary

The Pandemic EBT program (P-EBT) played a critical role in helping to fill significant holes in families' food budgets that emerged when schools closed, and jobs disappeared at the outset of the COVID-19 pandemic. P-EBT provided \$250 to \$450 per child, depending on the state's federal school meal reimbursement rate¹ and the average number of days schools were closed in their state in the spring of 2020. Nationwide, P-EBT during the spring of 2020 had the potential to deliver up to \$10 billion in food benefits to up to 30 million low-income school children.

The Center on Budget and Policy Priorities (CBPP) and the Food Research & Action Center (FRAC) commissioned this report to document the development and implementation of states' Pandemic EBT programs for the 2019-2020 school year. The purpose of this rapid study was to document different approaches that states took to implement Pandemic EBT and lessons they learned along the way.

At the outset of this documentation project, it was not clear whether most, let alone nearly all, eligible states and territories including the District of Columbia and Virgin Islands, would ultimately implement P-EBT.² Yet, on August 13 the last state was approved to implement P-EBT before the September 30 deadline.

The fact that 52 states and territories managed to implement a brand-new benefit for millions of children in less than 5 months with minimal federal guidance is an incredible feat by state agencies, speaks to their commitment to meeting the needs of low-income children, and is a testament to the importance of enhanced federal nutrition assistance during an ongoing public health and economic crisis. In this report "states" will include the states, the District of Columbia, and the Virgin Islands.



"We've done some of our best work in the past couple of months."

– State SNAP official



"I am most proud of my staff. This is way outside of their responsibilities and roles. They worked really hard to make things happen in order to get families through this pandemic."

– Child Nutrition director

The structure and rapid roll-out of P-EBT presented many challenges for states but there are early lessons learned from the successes, and improvements that can be made based on the shortcomings of the first implementation of the

¹ AK, HI, and USVI have higher reimbursement rates.

² The Northern Mariana Islands and American Samoa were not eligible. Guam did not opt to participate in P-EBT. Puerto Rico was not eligible for P-EBT even though it participates in the National School Lunch Program on the same basis as U.S. states, because SNAP operates as a block grant in Puerto Rico.

program. It appears the major driver for state decisions about implementation was the availability of student data and the associated challenges of interfacing with SNAP EBT systems. Direct issuance to children was the model that appears to have worked best, and yet for a majority of states the comprehensive student data needed to issue benefits did not exist in one place and had to be laboriously gathered up. This might be one reason not every state was able to issue P-EBT benefits to children whose families became newly eligible for F/RP meals because of job loss related to the pandemic.

As of the writing of this report, Congress has extended P-EBT for the 2020-21 school year, but no guidance has been issued by the U.S. Department of Agriculture's Food and Nutrition Service (FNS). There is also a possibility that a program like P-EBT will need to be implemented again in the future. For these reasons this study has been rapidly conducted so lessons learned can be gleaned for the second implementation. The following lessons learned were gleaned from the analysis of the data gathered for this study and our own knowledge of the program and states. A fuller discussion of the lessons can be found later in the report.

Lesson 1: The P-EBT program worked to provide food assistance to millions of school-aged children during a crisis, and it took impassioned and dedicated federal, state, and local staff to make it happen.

Lesson 2: Direct issuance to children was the model that worked best based on early reports.

Lesson 3: States need resources³ to improve the reliability of student data (how frequently it is updated) and interoperability of F/RP meals data and student enrollment data with their SNAP systems⁴.

Lesson 4: Troubleshooting benefit issuance was required for some children in every implementation approach- direct issuance, application, or a hybrid.

Lesson 5: It was important to enhance collaboration and communication amongst the P-EBT partners in state agencies, advocacy organizations, and with families.

³ The federal government typically provides administrative funding for child nutrition programs, including the NSLP, which P-EBT was designed to replace, yet P-EBT requires states to provide a 50/50 match like in the SNAP program.

⁴ The requirement to match NSLP data with SNAP data added to the complexity of implementation and the likelihood that eligible children were missed. This requirement was intended to exclude a small number of children who are home-schooled or in a private school not participating in NSLP.

Introduction

When schools unexpectedly shut their doors at the outset of the COVID-19 pandemic in March 2020, elected leaders recognized the consequences for low-income school children who were missing out on, among other things, nutritious meals at school. One of several responses that Congress established to address this issue through the Families First Coronavirus Response Act (FFCRA) was Pandemic EBT (P-EBT). P-EBT is a brand-new benefit program meant to give states a way to provide food assistance to children approved for free or reduced-priced (F/RP) school breakfasts and lunches to compensate for the meals they missed at school during the spring of 2020.

P-EBT was created to provide families of children eligible for F/RP meals with a grocery debit card to replace the missed meals. School districts worked valiantly to provide grab-and-go meals, but picking up several days of prepared meals might not have been feasible for working parents, or families living in rural areas or otherwise a long distance from the school pickup site, and might not be advisable for those at higher health risk.

P-EBT cards operated with the same Electronic Benefits Transfer (EBT) technology used for Supplemental Nutrition Assistance Program (SNAP) benefits. As a result, they allowed families to use benefits in the course of their ordinary shopping at any SNAP-authorized retailer.

State SNAP and Child Nutrition agencies were charged with developing and executing the P-EBT program from scratch as quickly as possible; an opportunity and challenge they rose to at a time they simultaneously faced numerous other challenges and demands, including significant increases in SNAP applications and other programs administered by the same agency and staff, such as unemployment insurance.

Since March 2020, states have been working tirelessly to issue P-EBT benefits to all eligible children. States had to use their best judgement to design and execute P-EBT under extremely difficult circumstances with



"We weren't just building a plane while flying it, we were trying to build a fighter jet."

– State Child Nutrition official

limited and evolving guidance from FNS, whose staff were also operating with limited direction from Congress and under challenging circumstances because of the pandemic. Such an undertaking required federal and state officials and school district personnel to work long days and weekends and use their creativity and agility to help ensure children in the communities they serve had access to food they were missing out on because they weren't going to school.

Background

P-EBT was authorized by the FFCRA on March 18, 2020. FNS issued two pieces of publicly available guidance for states - a Guidance Memo on March 20, 2020 and a Question and Answer document published on April 15.⁵ In order to implement P-EBT, states had to submit an implementation plan to FNS for approval, which had to be signed by state officials from both the SNAP and Child Nutrition agencies. States were required to include both SNAP and non-SNAP households in their implementation plan and commit to conducting a public information campaign about the availability of P-EBT. Other state plan elements required by FNS included:

1. How the state would confirm P-EBT eligibility with school enrollment data;
2. How benefit allotments would be calculated;
3. How benefits would be distributed to SNAP and non-SNAP households.

In the April 15 guidance, FNS communicated that states would be required to support 50% of the administrative costs to implement P-EBT choosing to apply SNAP's standard 50/50 reimbursement rate.

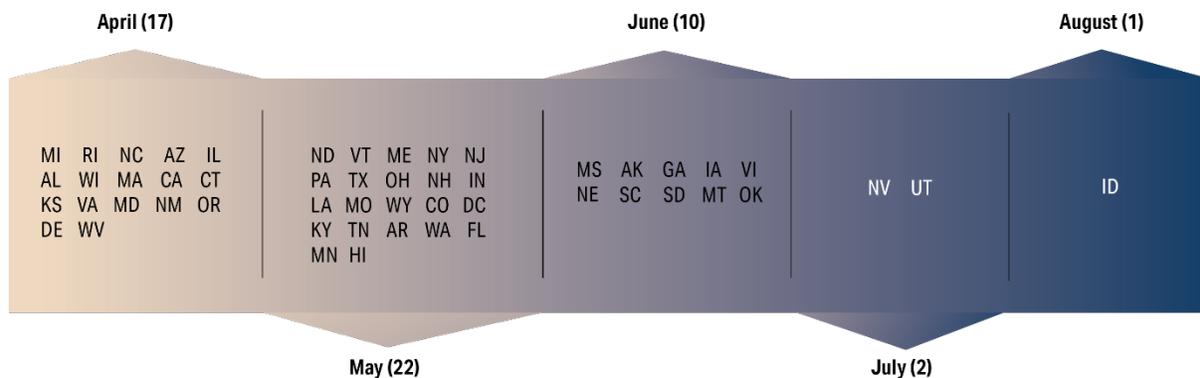


Figure 1: FNS approval dates for each state, listed in sequential order of approval by row.

FNS approved the first state P-EBT plan on April 9 for Michigan, followed by Rhode Island on April 10. Another six states - North Carolina (4/16), Arizona (4/17), Illinois (4/17), Massachusetts (4/17), Alabama (4/21), Wisconsin (4/22) were approved in the week following FNS' April 15 guidance. FNS approved an additional nine states by April 30 - California (4/23), Connecticut (4/24), Kansas (4/25), Virginia (4/25), Maryland (4/28), New Mexico (4/28), Oregon (4/29), Delaware (4/30), West Virginia (4/30). Of the remaining states, FNS approved P-EBT plans for 22 states in May, 10 states in June, two states (Nevada

⁵ Both can be found at <https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt> and are included in the Resource Library associated with this report.

and Utah) in July, and one state (Idaho) in August. (See *Table 2 for every state's plan approval date.*) That more than half the states had plans approved within six weeks is indicative of how quickly states and FNS had to react to the March 18th authorization. FNS provided relatively little guidance and focused on working with individual states on plan approval through email exchanges and phone conversations. Only three states began issuing P-EBT benefits in April (Michigan, Rhode Island, and Illinois) with all other issuances occurring in May and beyond.

Study Objectives

CBPP and FRAC conducted this study to rapidly document the development and implementation of P-EBT while it was still underway and state impressions were fresh. The goals of the project were to build collective understanding of the different approaches that states took to implement P-EBT in the spring and summer of 2020, draw out lessons learned in time to inform federal and state decisions related to P-EBT for the 2020-2021 school year, and inform future efforts to deliver benefits to families with children. We sought to answer questions like:

- What approaches did states take to implement P-EBT?
- What were the biggest factors that determined a state's approach to implementing P-EBT?
- What were the opinions of the state officials and advocates who implemented the program related to the ease and effectiveness of their approach?
- What lessons were learned that could improve future implementations, including about matching child nutrition data with school enrollment data and SNAP?

Where possible, the project also sought to identify areas of exploration for future research.

In September 2020, at least half of states are still issuing P-EBT benefits for the 2019-2020 school year and most administrative data on outcomes is not yet available.⁶ This study does not attempt to evaluate state performance or assess outcomes for children. It does not report how many eligible children received benefits, how much in benefits were delivered, or how much were used by eligible households.⁷ We hope that information on these aspects of the P-EBT will be forthcoming as states work to assess the impact of their programs. Rather, this report aims to document what states actually did to operationalize the program and what they learned along the way. In some instances, the report includes observations from the research team after reviewing information across multiple states and makes recommendations for the future.

⁶ P-EBT is available for the 2020-2021 school year but related information is not included in this report.

⁷ The exception is a few states that participated in interviews and voluntarily shared outcome data.

Approach/Methodology

To achieve the objectives of this project, the study team used a mixed-methods approach in which qualitative methods supplement the available quantitative data by adding value and deeper, more complex answers. When used together, mixed-methods strategies can offset limitations and allow for exploration and analysis.

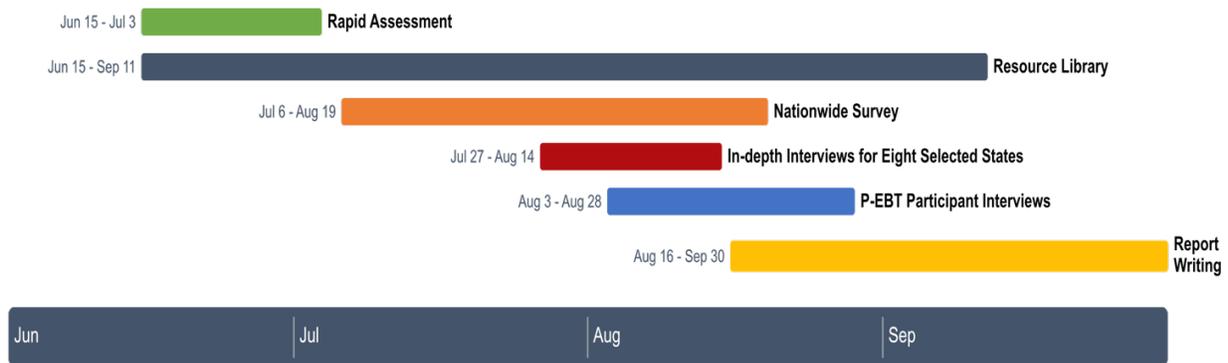


Figure 2: High-level timeline of this study

Rapid Assessment

The work began through gathering background materials for a resource library and conducting 16 key informant interviews to gather the perspectives of national organizations, state SNAP administrators, state Child Nutrition administrators, and local school districts. Beginning with a rapid assessment allowed for a more informed development of the survey instrument.

Nationwide Survey

An online survey was developed and distributed to state SNAP and Child Nutrition officials as well as other stakeholders through CBPP and FRAC outreach channels as well as partnering organizations. States were not asked to coordinate their responses and multiple responses from states were accepted and analyzed. The survey is the primary data collection method for this report and for the previously published state profiles (see www.cbpp.org/pebt and www.frac.org/pebt).

The survey was reviewed by six organizations⁸ and pre-tested by six individuals for quality control measures. The survey was conducted online using the Survey Monkey platform and was open from July 30 to August 12, 2020. The survey consisted of 25 questions covering various aspects of implementation

⁸ USDA Food & Nutrition Service; American Public Human Services Association; Council of Chief State School Officers; Code for America; Urban Institute; and the Brookings Institute provided comments on a draft version of the survey.

approaches. The survey took an average of 14 minutes to complete. Survey questions included a variety of types, including multiple choice, checkboxes where more than one response applied, Likert scales to measure opinions, a file uploading feature, and open-ended responses. Responses to questions were optional, with the exception of one (State) which we changed to be required in order to identify which state the response represented. A copy of the survey instrument can be found in Appendix B.

The survey received 140 responses, of which 70% were complete. Respondents were told skipping a question if they did not have an answer was allowed. Those respondents who identified which organization or perspective they represented included 45 from state SNAP program agencies, 24 from the state Child Nutrition (CN) program agencies, 25 advocates, 3 community partners, and one information technology/ systems perspective. In 19 states we had at least one response from both the SNAP and CN agencies. In the analysis and discussion, this report sometimes presents findings among all respondents (where N= the total responses for that question). That approach was used for opinion questions such as perceived successes and challenges of implementation. Because more individuals responded in some states than others, states are not equally weighted in these analyses. For other questions that were fact-based and related to implementation decisions or state profile features, multiple responses from a state were aggregated into a single state response. If there were conflicting responses within a state, to resolve the conflict the researchers relied on other publicly available information, interview data if available, and their judgment about which respondent was most likely to have first-hand knowledge of the feature based on the organization they represented. Charts and figures include notes that identify which analysis approach was used and what perspective the answer represents. All state SNAP agencies were given an opportunity to review and confirm their P-EBT state profiles; 28 of 52 states did.

A spreadsheet with survey results, information from interviews, and the publicly available information that underlie the previously published state profiles and the tables in this report has been compiled.

In-depth Interviews for Eight Selected States

We conducted 14 additional interviews with state SNAP agencies, Child Nutrition agencies, and advocacy organizations representing 8 states – Alabama, Arizona, Kansas, Minnesota, New York, Pennsylvania, Texas, and Wisconsin. These interviews were conducted to better understand the nuances of implementation, and to capture lessons learned in a timely manner while states were still in the process of implementing.

States were selected based on an initial scan in mid-June of emerging implementation models to document as many unique approaches as possible. In addition to considering the diversity of models and the fact that these states had all been approved in April or May and were in the midst of implementing, the

study team sought to engage states that varied by FNS region, EBT vendor, political leadership, state size, and other P-EBT specific decisions (e.g. approach to newly eligible children or troubleshooting.)

The research team used information gathered through in-depth interviews with the selected states to create case studies and high-level maps of the workflow for authorizing P-EBT benefits in those states. These states reviewed their case study summaries before publication.

P-EBT Participant Interviews

With help from Hunger Task Force, Milwaukee's local food bank, the study team conducted 6 phone interviews with families who applied for and/or received P-EBT benefits in Wisconsin. Each interviewed family had previously contacted the advocacy organization about P-EBT and volunteered to share their experience with a member of the research team during a 15 to 20-minute conversation. Interviewed parents received a \$25 gift card via email or U.S. mail as compensation for their time.

Overview of P-EBT Implementation

The following tables provide a general overview of states' P-EBT implementation. Table 1 includes each state's original estimate of the number of eligible children, the maximum P-EBT benefit amount available per child, and the potential total benefits to households for school year 2019-2020.

TABLE 1

Children eligible for P-EBT benefits, the maximum benefit per child, and the potential total amount of benefits to households statewide, 2019-2020 school year

State	Number of eligible children	Maximum P-EBT benefit per child	Potential total benefits to households
Alabama	420,395	\$313.50	\$132 million
Alaska	73,000	\$458.00	\$33 million
Arizona	703,000	\$315.00	\$220 million
Arkansas	303,120	\$319.00	\$97 million
California	3,927,173	\$365.00	\$1,433 million
Colorado	356,099	\$279.00	\$99 million
Connecticut	289,407	\$364.80	\$106 million
Delaware	61,602	\$370.50	\$23 million
District of Columbia	86,415	\$387.60	\$33 million
Florida	2,065,374	\$313.50	\$647 million
Georgia	1,100,000	\$256.50	\$282 million
Hawai'i	93,297	\$360.00	\$34 million
Idaho	130,000	\$302.00	\$39 million
Illinois	1,099,786	\$342.00	\$376 million
Indiana	588,127	\$319.00	\$188 million
Iowa	249,404	\$307.80	\$77 million
Kansas	169,795	\$291.00	\$49 million
Kentucky	601,551	\$313.50	\$189 million
Louisiana	732,204	\$285.00	\$209 million
Maine	84,000	\$383.00	\$32 million
Maryland	430,954	\$370.50	\$160 million
Massachusetts	522,000	\$399.00	\$203 million
Michigan	829,722	\$376.00	\$312 million
Minnesota	349,952	\$425.00	\$149 million
Mississippi	345,827	\$267.90	\$93 million
Missouri	454,690	\$302.00	\$137 million
Montana	48,385	\$330.00	\$16 million
Nebraska	156,257	\$281.00	\$44 million
Nevada	334,000	\$296.00	\$99 million
New Hampshire	45,190	\$376.00	\$17 million

TABLE 1

Children eligible for P-EBT benefits, the maximum benefit per child, and the potential total amount of benefits to households statewide, 2019-2020 school year

State	Number of eligible children	Maximum P-EBT benefit per child	Potential total benefits to households
New Jersey	594,207	\$416.10	\$247 million
New Mexico	245,000	\$399.00	\$98 million
New York	2,077,711	\$420.00	\$873 million
North Carolina	903,320	\$370.00	\$334 million
North Dakota	39,760	\$273.00	\$11 million
Ohio	850,000	\$302.10	\$257 million
Oklahoma	312,021	\$250.80	\$78 million
Oregon	351,000	\$384.00	\$135 million
Pennsylvania	991,843	\$370.50	\$367 million
Rhode Island	74,622	\$387.60	\$29 million
South Carolina	467,000	\$330.00	\$154 million
South Dakota	62,000	\$285.00	\$18 million
Tennessee	615,610	\$250.80	\$154 million
Texas	3,641,635	\$285.00	\$1,038 million
Utah	75,000	\$308.00	\$23 million
Vermont	39,000	\$387.60	\$15 million
Virgin Islands	13,000	\$379.00	\$5 million
Virginia	594,494	\$376.00	\$224 million
Washington	560,267	\$399.00	\$224 million
West Virginia	204,542	\$313.50	\$64 million
Wisconsin	438,000	\$324.90	\$142 million
Wyoming	36,271	\$285.00	\$10 million
TOTAL	29,800,000	\$330.00 (median)	\$10 billion

Sources: The number of eligible children is from publicly available information on state websites or in press releases. The maximum P-EBT benefit per child amounts are from USDA FNS P-EBT approval letters and SNAP agencies. The potential total benefits to households are calculated by multiplying the number of eligible children by the maximum benefit amount per child. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Table 2 includes the date FNS approved each state's plan, the period in which P-EBT benefits to cover meals when schools were closed during the spring of 2020 were issued, and the method for issuing P-EBT benefits to eligible children not receiving SNAP or other benefits including Temporary Assistance for Needy Families cash assistance, Medicaid, Foster Care, and Homeless/Migrant services.

TABLE 2

Overview of states' P-EBT implementation for the 2019-2020 school year

State	Plan approval date	Benefit issuance date range	Method for issuing P-EBT benefits to eligible children not receiving SNAP (or other selected benefits) ^a	
			Direct issuance	Application
Alabama	4/21/20	May - September	X	X ^b
Alaska	6/05/20	August - September		X
Arizona	4/17/20	May - August	X	X ^c
Arkansas	5/21/20	June - September	X	X ^d
California	4/23/20	May - August		X
Colorado	5/18/20	July - September		X
Connecticut	4/24/20	May - June	X	
Delaware	4/30/20	May - June	X	
District of Columbia	5/19/20	May - August	X	
Florida	5/27/20	June - September	X	
Georgia	6/05/20	July - September		X
Hawai'i	5/28/20	June - July	X	
Idaho	8/14/20	August - September	X	
Illinois	4/17/20	April - September		X
Indiana	5/14/20	May - Unknown	X	
Iowa	6/05/20	July - August	X	
Kansas	4/25/20	May - September		X ^e
Kentucky	5/19/20	May - September		X
Louisiana	5/14/20	June - September		X
Maine	5/05/20	May - July		X
Maryland	4/28/20	May - June	X	
Massachusetts	4/17/20	April - June	X	
Michigan	4/09/20	April - September	X	
Minnesota	5/27/20	June - September		X
Mississippi	6/02/20	June - August	X	
Missouri	5/15/20	May - September		X
Montana	6/26/20	July - September	X	X ^f
Nebraska	6/16/20	July - September		X
Nevada	7/09/20	July - September	X	

TABLE 2

Overview of states' P-EBT implementation for the 2019-2020 school year

State	Plan approval date	Benefit issuance date range	Method for issuing P-EBT benefits to eligible children not receiving SNAP (or other selected benefits) ^a	
			Direct issuance	Application
New Hampshire	5/12/20	Unknown - September		X
New Jersey	5/08/20	July - September	X	
New Mexico	4/28/20	June - September	X	
New York	5/06/20	May - September	X	
North Carolina	4/16/20	May - June	X	
North Dakota	5/01/20	May - September		X
Ohio	5/11/20	June - September	X	
Oklahoma	6/26/20	July - August	X	
Oregon	4/29/20	May - September	X	
Pennsylvania	5/08/20	May - August	X	
Rhode Island	4/10/20	April - June	X	
South Carolina	6/17/20	July - September	X	
South Dakota	6/18/20	June - August		X
Tennessee	5/19/20	June - September		X
Texas	5/08/20	May - September		X
Utah	7/09/20	July - September		X
Vermont	5/04/20	May - September	X	
Virgin Islands	6/10/20	August - September	X	
Virginia	4/25/20	May - June	X	
Washington	5/22/20	June - September		X
West Virginia	4/30/20	May - September	X	
Wisconsin	4/22/20	May - September		X
Wyoming	5/16/20	June - July		X
Total			31	25

a All states except LA and WY directly issued benefits to children in households receiving SNAP benefits without requiring a parent/guardian to take any action, such as submitting an application. Some states referred to this as “automatic issuance.” It includes benefits loaded onto existing SNAP cards and benefits loaded onto new P-EBT cards that were mailed to families. Some states directly issued benefits to children in households receiving other benefits, such as Temporary Assistance for Needy Families cash assistance, Medicaid, Foster Care, and Homeless/Migrant services.

b Opt-in letter for children attending schools operating under the Community Eligibility Provision who were not directly certified

c For newly eligible children and those missed by direct issuance

d For private schools that do not report on the E-school platform

e Referred to as a registration portal

f For children missed by direct issuance

Sources: Plan approval dates are from FNS P-EBT approval letters and SNAP agencies. Benefit issuance dates are from publicly available information on state websites or in press releases. Whether an application was required was confirmed through a nationwide survey. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Variations in Eligibility

All students who were approved for F/RP meals through the National School Lunch Program (NSLP) during the 2019-2020 school year before the COVID-19 pandemic began were eligible for P-EBT under FFCRA. This included children directly certified for F/RP meals based on their enrollment in SNAP or other public benefit programs, children who completed a F/RP meal application during the school year, and children attending a Community Eligibility Provision (CEP) or Provision 2 or 3 school where all children receive free school meals without completing individual applications.⁹ The areas where variation emerged among states were in whether or not they included any children enrolled in Pre-K or Head Start and whether or not they included any children who became newly eligible for F/RP school meals during the implementation period.

Pre-K and Head Start in Participating Schools

Young children attending a Pre-Kindergarten or Head Start program in a school that participated in the NSLP were eligible for P-EBT benefits. It is important to note that in many states, all or most Pre-Kindergarten and Head Start programs are served through the Child and Adult Care Food Program (CACFP), rather than NSLP, so were not eligible for P-EBT under FFCRA. Thirty-one (31) states reported including children attending a Pre-Kindergarten or Head Start program in a school that participated in the NSLP in P-EBT when data was available. Other states said that initial guidance from FNS was unclear on this population, so left them out of initial plans. At least a few states (e.g. Alabama) later submitted P-EBT plan amendments to FNS in order to add these children after implementation began. (See Table 3)

Newly Eligible Children

Families who lost income due to the pandemic and became newly eligible for F/RP school meals had inconsistent access to P-EBT benefits. While 34 states reported extending P-EBT benefits to newly eligible children, they did so in different ways. (See Table 3)

- At least 12 states reported on the survey that they added children whose families applied for and were enrolled in SNAP or were directly certified after the pandemic began.
- Twenty (20) states added children who submitted a F/RP meal application to their local school district. Whether students actually benefitted from this policy depended on whether schools were routinely accepting and processing school meal applications and whether they communicated to families that they could apply for F/RP meals to obtain P-EBT benefits, as

⁹ More information on CEP can be found in the following reports <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf> and on CEP and Provision 2 here <https://frac.org/wp-content/uploads/frac-facts-offering-free-breakfast-to-all-students.pdf>.

Oregon did.¹⁰ Without such communication, families would have no reason to apply for free or reduced-price school meals when schools were closed.

- Twelve (12) states reported that newly eligible children could receive benefits if they completed a P-EBT application. During in-depth interviews, state officials explained that newly eligible families would first have to be certified as eligible through SNAP or a F/RP meal application and *then* complete a P-EBT application in order to receive the benefit.

FNS guidance required states to prorate benefits for those who applied for SNAP or F/RP meals after the first month of eligibility, rather than allowing them to receive the maximum P-EBT benefit. Some states and advocates reported that this guidance from FNS added complexity to implementation, making it harder to incorporate newly eligible children.

TABLE 3

Issuing P-EBT Benefits to Newly Eligible Households and Pre-K Students

State	Newly Eligible Included	Mechanism Used to Issue to Newly Eligible Households			Pre-K Students in Participating Schools Included
		Direct Issuance to SNAP	P-EBT Application ^a	Free/Reduced-Price Meal Application	
Alabama	X	X		X	X
Alaska	X	X	X	X	Unknown
Arizona	X		X		X
Arkansas					Unknown
California	X	X	X		X
Colorado	X		X		X
Connecticut					X
District of Columbia					Unknown
Delaware	X			X	Unknown
Florida	X	X ^b			Unknown
Georgia					X
Hawai'i	X			X	
Idaho	TBD				TBD
Illinois	X		X		X
Indiana	X			X	

¹⁰ Oregon's Confidential Household Application for Free and Reduced Price Meals can be found online at <https://www.ode.state.or.us/apps/FRLApp/Default>.

TABLE 3

Issuing P-EBT Benefits to Newly Eligible Households and Pre-K Students

State	Newly Eligible Included	Mechanism Used to Issue to Newly Eligible Households			Pre-K Students in Participating Schools Included
		Direct Issuance to SNAP	P-EBT Application ^a	Free/Reduced-Price Meal Application	
Iowa					X
Kansas	X	X	X		
Kentucky	X		X		X
Louisiana	X		X		X
Maine	X			X	X
Maryland	X			X	X
Massachusetts	X	X		X	X
Michigan	X	X		X	X
Minnesota					
Mississippi	Unknown				Unknown
Missouri	X			X	X
Montana					
Nebraska	X	X	X	X	X
Nevada	Unknown				
New Hampshire	X			X	Unknown
New Jersey	X				X
New Mexico	X				X
New York					X
North Carolina	X			X	X
North Dakota	X		X		X
Ohio					
Oklahoma					Unknown
Oregon	X			X	X
Pennsylvania	X	X		X	X
Rhode Island	X	X		X	X
South Carolina	X	X		X	X
South Dakota					
Tennessee	Unknown				Unknown
Texas	X		X		X
Utah					X
Vermont	X			X	X

TABLE 3

Issuing P-EBT Benefits to Newly Eligible Households and Pre-K Students

State	Newly Eligible Included	Mechanism Used to Issue to Newly Eligible Households			Pre-K Students in Participating Schools Included
		Direct Issuance to SNAP	P-EBT Application ^a	Free/Reduced-Price Meal Application	
Virgin Islands	Unknown				Unknown
Virginia	X			X	X
Washington	X	X	X		
West Virginia	X			X	X
Wisconsin	X ^c				Unknown
Wyoming					X
Total	34	12	12	20	31

a States indicating a P-EBT application as a mechanism for newly eligible children to access the benefit also required the household to have newly enrolled in SNAP or another program used for direct certification or have completed a traditional F/RP meal application.

b Florida not verified by SNAP agency.

c Wisconsin had a manual process for issuing P-EBT benefits to newly eligible children.

Sources: Nationwide survey responses or publicly available information on state websites or in press releases when available. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Approaches to Implementing P-EBT

Getting to Implementation

As soon as the Families First Coronavirus Response Act was signed into law on March 18, 2020, states turned to FNS for concrete guidance on how to design and implement P-EBT. Some states that were early adopters of P-EBT expressed concerns that FNS' guidance was slow to come, insufficiently detailed, and over time may have been applied inconsistently across FNS regions. Other than the March 20 and April 15 guidance documents from FNS mentioned previously,¹¹ states were dependent on informal guidance from FNS provided via email and phone calls, along with information from peer-states' plans that had already gained FNS' approval. Some states reported that the absence of more guidance before they submitted a plan for approval created stress, confusion, and re-work.

Once states understood FNS' basic requirements for P-EBT (described in Background section), they often needed to gain the support and approval from their Governor's office and reaffirm inter-agency partnerships. Some states interviewed for the study mentioned this involved developing data-sharing agreements between agencies. For example, in New York the Child Nutrition agency reported significant effort went towards developing data sharing agreements so that Medicaid and student enrollment data could be matched before sending to the SNAP agency. States then designed a strategy and submitted an implementation plan to FNS for approval. Several interviewed states described negotiations with FNS that delayed the anticipated implementation date. As FNS' final approval came through, states communicated their plans to the media, community partners, legislative staff, and families eager to access relief from the new program.¹²

Availability of Student Data

Survey respondents were in general agreement that the biggest driver of their implementation model was "availability of student information," as shown in Figure 3. Important secondary factors included systems and technology capacity and the urgency of delivering benefits.

¹¹ Both can be found at <https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt> and are included in the Resource Library associated with this report.

¹² Because plans often evolved via email communications between when they were submitted and when they were approved, FNS did not publish state plans and the resource library accompanying this report does not include any.

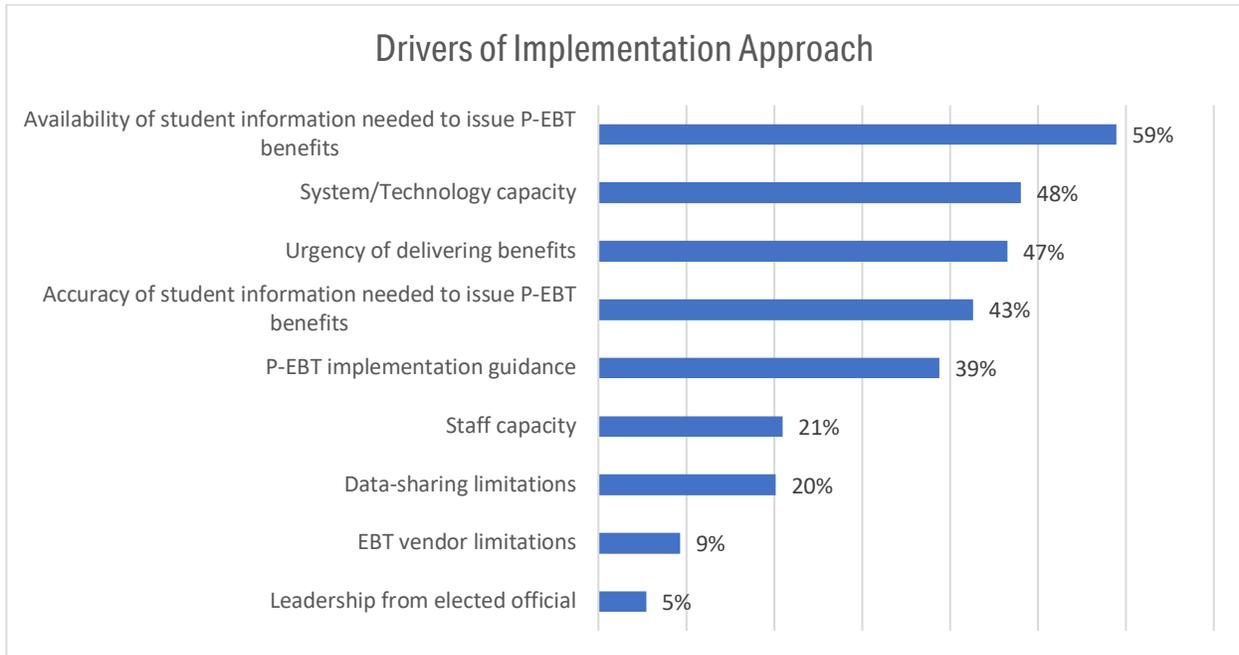


Figure 3: Responses to survey question "What were the biggest factors that determined your approach to implementing P-EBT? (select top THREE)" Opinion question, so percentages were calculated on total respondents. N=129

P-EBT was designed by Congress to leverage the information education agencies maintain on students approved for F/RP meals in order to determine eligibility for P-EBT. State education agencies and school districts store and maintain student data differently. Student data systems are designed to capture a wide array of student information, and while approval for F/RP meals might be a data element, a separate system is usually used to manage the school meal programs. In a handful of states (e.g. Michigan, Arizona), a comprehensive, centralized database for all student information, including F/RP meal approval and mailing addresses, existed before P-EBT was enacted and allowed for relatively streamlined implementation of P-EBT.¹³ **For the majority of states though, comprehensive student information needed to issue P-EBT benefits was harder to access, compile, and clean.** The two main reasons for this were:

1. Student information was maintained by individual schools and school districts, not in a central, statewide database. This meant that state SNAP agencies needed to receive lists of student information from each individual school or school district across their state. That data could not be quickly compiled into a statewide list because schools (public and non-public) and districts had widely varying approaches and methods to storing and organizing the information. In

¹³ Even in these states, additional information was needed to capture the maximum number of eligible children and all necessary data fields (e.g. information for children attending private schools)

addition, school buildings were closed due to the pandemic; school staff who were still working were focused on transitioning to virtual learning, setting up school meal distribution sites, and transitioning schools from NSLP to emergency summer meals. In some cases, the school administrators responsible for managing student data were furloughed or no longer working as it was the end of the school year before P-EBT implementation was beginning in their state; and/or

2. Information systems used to track F/RP meal certifications did not contain all data states determined they needed to issue P-EBT benefits (e.g. current mailing addresses or parent/guardian information) since these were not necessary for normal operation of the National School Lunch Program. States also faced system interoperability challenges, like mismatched fields for data elements like addresses, and had to quickly learn about system compatibility and enough about the different programs to understand data assumptions.

Because it was their best and only option, most states were dependent on local schools and school districts to quickly pull together lists of eligible students under extremely difficult circumstances. Many school districts rose to the challenge. One example shared was of a school employee sitting in the parking lot of a closed school building to access the school's secure network through her school-issued laptop in order to retrieve the records. This was necessary because school staff working from home under public health orders did not have remote access to the school's secure server. Another state official reported school administrative staff transporting paper files containing student data from the school to the school district to be added to the electronic file. During a time when schools were overwhelmed, school officials like this one went the extra mile to provide the SNAP agency with the data elements needed to issue P-EBT benefits.

Inevitably, some children were missed through this process, either because entire schools were not able to upload student files by the state deadline, or information was incomplete or outdated (e.g. had not been updated since October 2019 when most students were certified for F/RP meals.) The availability and accuracy of student data was the most significant driver of the implementation approach states used, as described in the following section on implementation models. Some states responded to this gap once implementation was underway and developed solutions, such as giving schools a second chance at data submission.

Implementation Models

FNS' original P-EBT guidance document from March 20, 2020 assumed that states would require applications from all non-SNAP households "so that a P-EBT case may be set up in the State's eligibility system" but gave states the opportunity to "propose alternative procedures if the necessary data for non-SNAP households is readily available." P-EBT implementation plans proposed by states and approved by

FNS fit along a spectrum, depicted in Figure 4. On one end of the spectrum, states issued P-EBT benefits directly to all eligible children because they had sufficient information to do so without requiring additional steps from parents/guardians. As of late September, 40 states identified and directly issued P-EBT benefits to at least some eligible children in non-SNAP households. Even in those states, not all eligible children received benefits through the direct issuance process due to various issues (out of date addresses, inaccurate or lack of matches in the system due to data or field differences). Some states, like Alabama and Wisconsin, created a manual process for those families to request and receive benefits.¹⁴ In some direct issuance states, those children missed out on the benefit because there was no clear process to request missing benefits.

On the other end of the spectrum, two states (Louisiana and Wyoming) required all parents/guardians, including those receiving SNAP benefits, to submit an application (or other information collection form) to access P-EBT benefits for their children.

The remaining 23 states participating in P-EBT fit in the middle of the spectrum, initially using a combination of direct issuance and an application or other information collection form to reach all eligible children.

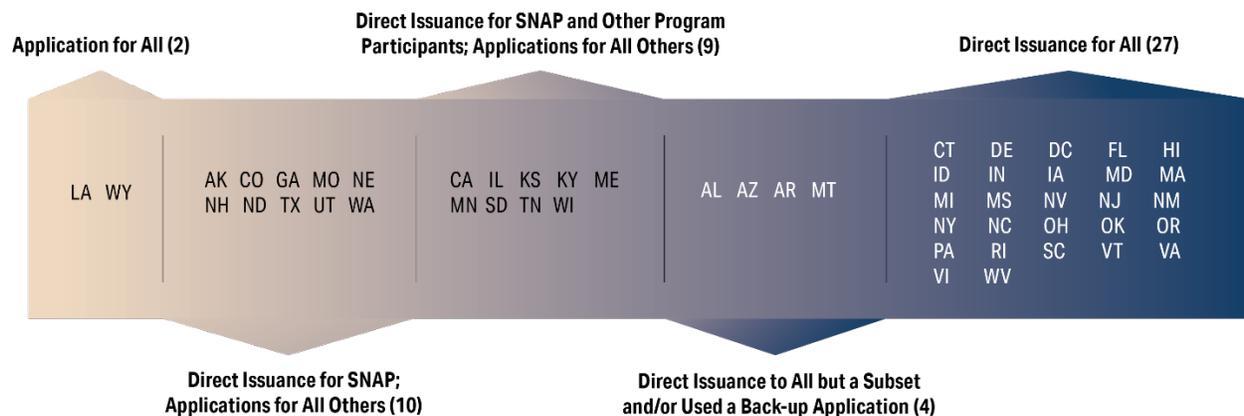


Figure 4: Spectrum of P-EBT Implementation Models. Listed in alphabetical order by row.

In every state except the two that required all families to apply, states attempted to issue P-EBT benefits directly to eligible children enrolled in SNAP. All but one of these states (California) did so by depositing P-

¹⁴ The term "manual benefit process" or "manual process" refers to when state agency staff individually research and process a case.

EBT funds into each family's existing SNAP benefit account, which they could access through their SNAP EBT card.¹⁵

Most states that used direct issuance encountered challenges reaching non-SNAP children, resulting in some states extending the application deadline to reach children who were missed. On the other hand, as of the publication of this report, three states (GA, TN, WY) are transitioning from using applications as the primary means of reaching children to direct issuance because there remain eligible children who have not been reached through the application process.

Direct Issuance for SNAP; Applications for All Others

In 10 states, parent/guardians were required to submit an application (or other information collection form) for the P-EBT benefit for children who were not already enrolled in SNAP. This includes Alaska, Colorado, Georgia, Missouri, Nebraska, New Hampshire, North Dakota, Texas, Utah, and Washington.¹⁶

Direct Issuance for SNAP and Other Program Participants; Applications for All Others

In nine states, P-EBT benefits were issued directly to eligible children enrolled in SNAP, as well as one or more other assistance program (including TANF, Medicaid, Foster Care, and Homeless/Migrant Services). The other assistance programs used in each state are listed in Table 4. Issuing P-EBT benefits to students in foster care and those experiencing homelessness made confirming current guardians and mailing addresses even more important because of the transient nature of these programs. Several states interviewed reported working closely with state child welfare administrators and community-based organizations to issue benefits to the correct household. Applications were required for all other children eligible for P-EBT. This includes California, Illinois, Kansas, Kentucky, Maine, Minnesota, South Dakota, Tennessee, and Wisconsin.

Direct Issuance to All but a Subset and/or Used a Back-up Application

In four states, P-EBT benefits were issued directly to the majority of eligible children, with applications required only for a subset of children, either by design from the beginning, or as a back-up for when direct issuance was not successful in reaching some eligible children. Alabama required the completion and return of an "opt-in letter" for children who attended a CEP school and were not automatically approved

¹⁶ Georgia originally issued P-EBT benefits directly just to eligible children enrolled in SNAP and all other families were required to apply. In early September, the SNAP agency announced that families who were not able to apply by the application deadline (September 18) would be issued a P-EBT card directly, using the mailing address on file with their school as of March 2020.

for free meals through a data matching process (known as direct certification).¹⁷ Arkansas had an application only for children who attended private schools. Arizona created an application for children missed by their direct issuance process, as well as children who became newly eligible for F/RP school meals after schools closed in March. Montana developed an application just for children who were inadvertently missed in the direct issuance process.¹⁸

Direct Issuance for All

Twenty-seven (27) states took this approach. This model includes issuing benefits directly to students based on data about their approval for F/RP school meals. Even in these states, direct issuance didn't work for at least some children. For example, the address used was sometimes out of date or, for states that issued cards to the head of household, the data didn't include head of household information or there was difficulty grouping children into households. There were often several rounds of data sharing between SNAP agencies and Child Nutrition agencies or school districts. In cases where information was missing, or if contact information hadn't been collected or provided, there wasn't a way for the state SNAP agency to contact families to fill in information needed to process benefits. In at least a few states, a process was created for parents to request and receive benefits through a manual process at the SNAP agency. In other direct issuance states, families missed out on the benefit because there was no manual process to catch them.

¹⁷ The Community Eligibility Provision is a special provision in the school meals programs that allows high-poverty schools or school districts to serve meals at no charge to all students without processing household school meals applications. School districts are reimbursed based on the share of students who are automatically approved for free or reduced-price school meals through a process known as direct certification. Children in households receiving SNAP benefits are automatically eligible for F/RP school meals. School districts are required to directly certify children living in households that participate in SNAP based on a data match with student records. States and school districts also may match school enrollment records with data from Temporary Assistance for Needy Families cash assistance, Medicaid in some states, Foster Care, Homeless/Migrant Services, or the Food Distribution Program on Indian Reservations. More information on CEP can be found in the following reports <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf> and on CEP and Provision 2 here <https://frac.org/wp-content/uploads/frac-facts-offering-free-breakfast-to-all-students.pdf>

¹⁸ This information was gleaned from state comments. The survey did not specifically ask states about whether an application or online form was created for families who were inadvertently missed in the direct issuance process, as Montana did, so it is possible additional states did the same.

TABLE 4

Public Assistance Programs used for Direct Issuance

State	SNAP	TANF	Medicaid	Foster Care	Homeless/ Migrant Services
Alabama	X	X		X	X
Alaska	X				
Arizona	X	X			
Arkansas	X				
California	X	X	X	X	X
Colorado	X				
Connecticut	X	X	X		
Delaware	X	X			
District of Columbia	X				
Florida	X	X	X		
Georgia	X				
Hawai'i	X	X		X	
Idaho	X				
Illinois	X			X	X
Indiana	X	X	X		
Iowa	X				
Kansas	X	X	X	X	
Kentucky	X	X	X	X	
Louisiana					
Maine	X	X			
Maryland	X				X
Massachusetts	X	X			
Michigan	X	X	X	X	X
Minnesota	X	X			
Mississippi	X				
Missouri	X				
Montana	X			X	X
Nebraska	X				
Nevada	X	X	X	X	X
New Hampshire	X				
New Jersey	X	X	X		
New Mexico	X	X			
New York	X	X	X		
North Carolina	X	X	X	X	X

TABLE 4

Public Assistance Programs used for Direct Issuance

State	SNAP	TANF	Medicaid	Foster Care	Homeless/ Migrant Services
North Dakota	X				
Ohio	X				
Oklahoma	X				
Oregon	X				
Pennsylvania	X	X	X	X	X
Rhode Island	X				
South Carolina	X	X		X	
South Dakota	X	X	X		
Tennessee	X	X			
Texas	X				
Utah	X				
Vermont	X			X	
Virgin Islands	X	Unknown	Unknown	Unknown	Unknown
Virginia	X	X	X	X	X
Washington	X				
West Virginia	X		X		
Wisconsin	X	X	X	X	X
Wyoming					
Total	50	25	16	15	11

Sources: Nationwide survey responses or publicly available information on state websites or in press releases when available. Definitions of the public assistance programs can be found in the Glossary in Appendix A. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Experience with an Application or Information Collection Form

Half (25) of the states did not issue P-EBT benefits exclusively through direct issuance. These states required or offered an application or other information collection form for at least some families. Of those, the states requiring an application with the highest number of eligible children were California (3.9 million), Texas (3.6 million), Georgia (1.1 million), Illinois (1.1 million) and Louisiana (732,000). In all of these states, SNAP and Child Nutrition officials reported that missing and outdated address information in existing student information systems was the biggest factor influencing their decision, as shown in Figure 5. Many states reported that an application was necessary to capture head of household information in order to issue a new P-EBT card to the head of household. (See *P-EBT Card Issuance* section below for more detail.)

In alignment with existing F/RP meal application policy, FNS did not allow states to *require* P-EBT applicants to provide a Social Security Number (SSN) for either the student or head of household, though many states requested this information. In interviews, states also identified program integrity and reconciliation as reasons to include some fields on applications, such as signatures. (See Table 6 for a list of application elements by state.) In two states, applications were made available to capture children who were inadvertently missed in the initial direct issuance (Arizona, Montana).

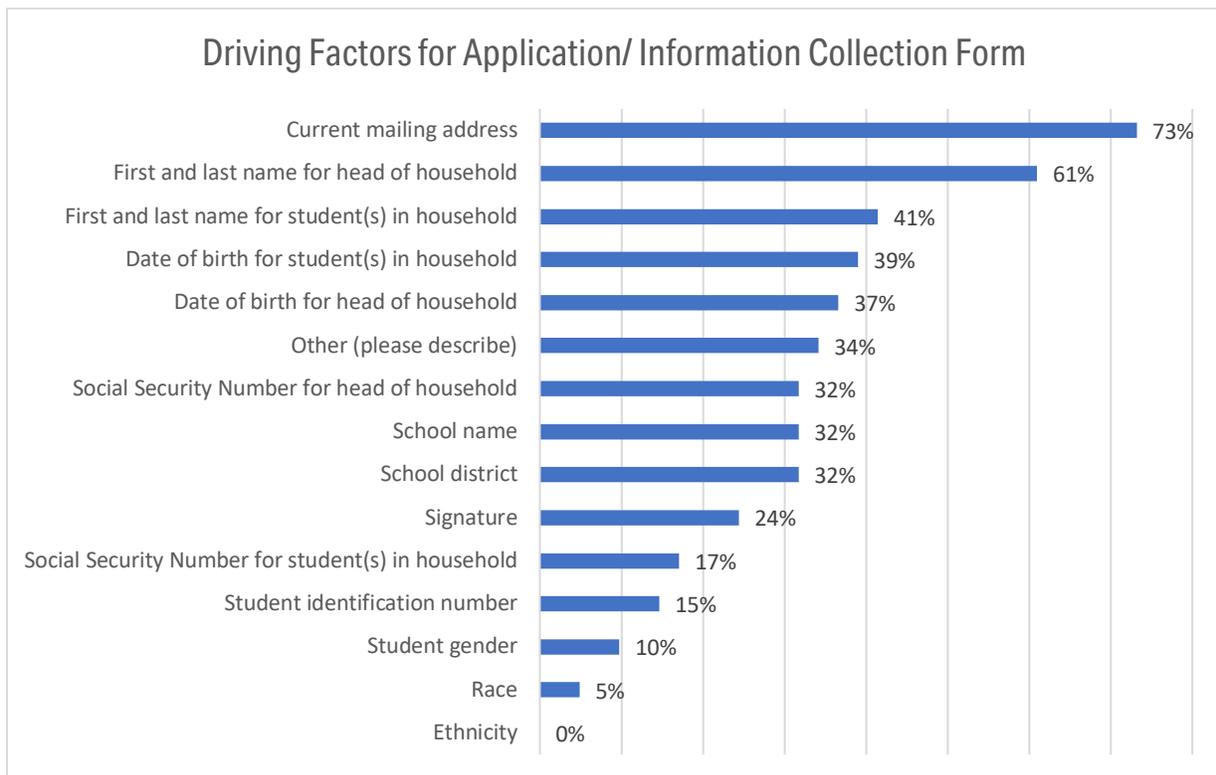


Figure 5: Responses to survey question "What information was needed to issue P-EBT benefits, but not available, which lead you to create an application or other information collection form? (select all that apply)" Percentages were calculated using responses from state officials in states where applications or other information collection forms were used. N=41.

P-EBT applications were also not successful in reaching all eligible students. In September 2020, at least three states - Georgia, Tennessee, and Wyoming - decided to directly issue P-EBT benefits to all children who had not successfully applied before the application deadline.¹⁹ Louisiana also chose to re-open their application period in September after a 30-day application period in June failed to reach a significant portion of eligible children.²⁰

¹⁹ See Georgia's announcement at <https://dfcs.georgia.gov/pandemic-electronic-benefit-transfer>; In Tennessee, P-EBT cards for children who did not apply by the deadline were provided to schools for distribution. See <https://www.tennessean.com/story/news/politics/2020/09/03/tennessee-waive-food-assistance-application-schools-distribute/5702175002/>.

²⁰ See Louisiana's announcement at <http://www.dcf.louisiana.gov/page/pebt-program>.

Application Methods Available to Families

The vast majority of the 25 states that developed some kind of application for P-EBT made their applications (or other information collection form) available online. Sixteen (16) states also took applications over the phone to remove barriers families may have experienced with the online application. Paper applications were also available in some states and could be mailed or faxed to return (as shown in Table 5). One example of a unique approach is from Alabama where children attending a CEP school who were not directly certified for F/RP school meals were mailed an "opt-in" letter to complete before P-EBT benefits were issued. (See *Alabama Case Study for more information.*) In Kansas, families identified by school districts were invited to "register" for P-EBT and each eligible family was emailed a link to an online registration portal. (See *Kansas Case Study for more information.*)

Advocates played a meaningful role in expanding access through conversations with state leaders to ensure applications were accessible to as many families as possible and through helping families complete an application or troubleshoot when benefits were not sent. For example, the Minnesota Hunger Solutions Food HelpLine provided application assistance over the phone, including interpretation services, which were critical early in implementation when the application was only available in English. Hunger Solutions also offered an online inquiry form which included the information fields the SNAP agency needed to conduct troubleshooting. Families could fill out the form and Hunger Solutions would compile the information and send it to the SNAP agency for manual processing. Hunger Task Force in Wisconsin also provided support to complete phone applications, including Spanish translation. Food Bank of Alaska set up an online application as an alternative to the paper form that the state SNAP agency mailed.

TABLE 5

P-EBT Application or Other Information Collection Form Features^a

State	Information-gathering period	Application submission method(s)			Language(s) besides English
		Online	Paper	Phone	
Alabama	June – 09/30/20		X	X	Spanish
Alaska	Until 9/30/20		X		Unknown
Arizona	Online: 6/15/2020 Phone: 8/1/2020	X		X	Spanish
Arkansas	Unknown – 09/30/20	X		X	None
California	Until 7/15/2020	X			Spanish Chinese
Colorado	Until 9/23/20	X		X	Spanish

TABLE 5

P-EBT Application or Other Information Collection Form Features^a

State	Information-gathering period	Application submission method(s)			Language(s) besides English
		Online	Paper	Phone	
Georgia	Until 9/18/20	X			Spanish
Illinois	5/1/20 - 8/31/20	X	X		Spanish
Kansas	May - 6/31/20	X	X	X	Spanish
Kentucky	6/1/20 - 8/31/20	X		X	Unknown
Louisiana	5/18/20 - 6/15/20, 9/8/20-9/29/20	X		X	None
Maine	5/5/20 - 6/30/20			X	None
Minnesota	Until 7/31/20	X	X	X	Spanish Vietnamese Russian Somali Hmong
Missouri	5/20/20 - 6/8/20	X	X		Spanish, Russian, Bosnian, Chinese, Vietnamese, Arabic
Montana	Until 9/21/20	X	X	X	Unknown
Nebraska	6/22/20 - 7/20/20	X		X	Spanish
New Hampshire	Until 8/24/20	X			Unknown
North Dakota	Until 7/15/20	X	X		None
South Dakota	6/19/20 - 8/14/20	X	X	X	None
Tennessee	6/15/20 - 8/14/20	X		X	Unknown
Texas	06/01/20 - 8/21/20	X		X	Spanish
Utah	Until 8/31/20	X		X	None
Washington	6/29/20 - 09/16/20	X		X	Spanish
Wisconsin	5/9/20 to 7/31/20	X			Spanish
Wyoming	Until 6/3/20	X	X		Spanish
Total		22	10	16	

^a Only includes states that had an application or other form for collecting information. N=25

Sources: Nationwide survey responses or publicly available information on state websites or in press releases when available. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Disseminating the Application

Several of the states interviewed for this study (Kansas, Wisconsin, Texas) created a P-EBT application process designed to be viewable only by families participating in the F/RP school meals program. These states intended for eligible families to receive a private application link from their school district to apply for P-EBT. It was not designed to be a public application. In these states, not all eligible families received the application link, so families reached out to the state and community partners for help. In Kansas and Wisconsin, the application links were eventually published by the state.

By comparison, other states with applications, such as Texas and Utah developed stand-alone P-EBT applications. Minnesota and California, for example, did so with support from Code for America, a civic technology non-profit organization.²¹ Still other states, like Colorado and Washington, added a publicly available P-EBT application to their existing online application system for public benefits, like SNAP.²² All of these states leveraged existing outreach channels, similar to those used for SNAP, including SNAP outreach contractors, to spread the word about P-EBT and circulate the application link.

²¹ See Code for America and U.S. Digital Response Partner to Help States Reach Families with Pandemic-EBT, April 21, 2020. Available at <https://www.codeforamerica.org/news/code-for-america-and-u-s-digital-response-partner-to-help-states-reach-families-with-pandemic-ebt>

²² See Colorado's public-facing P-EBT application at <https://coloradopeak.secure.force.com/PEBT>

The information requested in each state's application is summarized in Table 6.

TABLE 6

Requested Application (or other Information Collection Form) Elements^a

State	HOH first and last name	Student(s) first and last name	HOH DOB	Student(s) DOB	HOH SSN	Student(s) SSN	Student gender	Student ID number	Current Mailing Address	School District	School Name	Race or Ethnicity	Signature	Other
Alabama			X										X	
Alaska	X	X							X				X	
Arizona	X	X		X			X	X	X	X			X	
Arkansas	X	X		X					X					
California	X	X		X					X	X	X		X	
Colorado	X	X	X	X		X		X	X	X	X		X	Income
Georgia	X	X	X	X	X		X	X	X	X	X	X	X	
Illinois	X	X	X	X	X	X	X		X	X	X		X	
Kansas	X	X	X	X	X				X	X				
Kentucky	X	X	X	X				X	X	X	X			
Louisiana	X	X	X	X	X	X	X	X	X	X	X		X	
Maine		X		X					X					
Minnesota	X	X	X	X			X		X		X		X	
Missouri	X	X	X	X	X	X	X		X	X	X		X	
Montana	X	X		X					X	X	X		X	
Nebraska	X	X	X	X	X	X		X	X	X	X			E-mail address, phone #
New Hampshire	X	X	X	X		X			X					
North Dakota	X	X	X	X					X	X			X	
South Dakota	X	X	X	X	X	X		X	X					
Tennessee ^b														

TABLE 6

Requested Application (or other Information Collection Form) Elements^a

State	HOH first and last name	Student(s) first and last name	HOH DOB	Student(s) DOB	HOH SSN	Student(s) SSN	Student gender	Student ID number	Current Mailing Address	School District	School Name	Race or Ethnicity	Signature	Other
Texas	X	X	X	X	X	X			X	X				Gender of HOH, phone #, type of school
Utah	X	X		X					X	X	X	X		Address on file with school, e-mail address, phone #
Washington	X	X	X	X					X					
Wisconsin	X	X	X	X		X			X	X	X			
Wyoming	X	X	X	X	X	X			X				X	
TOTAL	22	23	17	22	9	10	6	7	23	15	12	2	13	

HOH stands for Head of Household. DOB stands for date of birth. YOB stands for year of birth. SSN stands for Social Security Number.

^a Only includes states that had an application or other form for collecting information. N=25

^b Unknown

Sources: Nationwide survey responses or publicly available information on state websites or in press releases when available. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Ease and Effectiveness of Implementation Models

Survey respondents were asked for their opinions on the level of difficulty to implement each P-EBT approach, and how effective each P-EBT implementation approach was in reaching eligible families. Because the survey was conducted in the midst of implementation, survey responses are assumed to be subjective and not based on administrative data.

Survey respondents reported that direct issuance to SNAP households was the easiest and most effective approach to P-EBT implementation. As shown in Figure 6, 65% of respondents said direct (also called "automatic") issuance to SNAP households was easy or very easy, and 82% said it was effective or very effective as shown in Figure 7. These high marks can likely be explained by SNAP households already having active EBT cards that could be quickly loaded with additional funds to cover the cost of missed school meals and SNAP offices designed to handle more frequent customer service contacts with families.

After direct issuance to SNAP households, states considered direct issuances to eligible children enrolled in other assistance programs used for direct certification (e.g. TANF, Medicaid) as the next easiest and most effective approach. Nonetheless, states faced challenges distributing new P-EBT cards to these children due to outdated addresses and difficulty grouping children into households in states that issued cards to the head of household.

By comparison, P-EBT applications were considered more difficult to implement and the least effective of the three approaches. States had to develop and implement a new application process for capturing eligible children in a very short timeline. Most important, if eligible children's parents did not apply in the given time period (usually 60 days initially) then the benefit would not reach them.

Respondents reported mixed experience with two implementation approaches. One was the state experience with direct issuance to CEP schools or districts. Some states interviewed for the study reported CEP data comes from a different source (school enrollment files) than F/RP school meals data (Child Nutrition files) and is missing data fields, such as parent/guardian name, that are captured on a F/RP meal application, making it difficult to match children from CEP schools or districts to SNAP households. Eighty-one percent of respondents from states that used direct issuance to children in CEP schools reported it was difficult or very difficult, however 42% reported it was either effective or very effective. Similarly, 43% of respondents from states that used manual benefit processing for special circumstances said it was either effective or very effective, but 82% reported it was either difficult or very difficult, indicating that these methods are difficult but worth the effort.

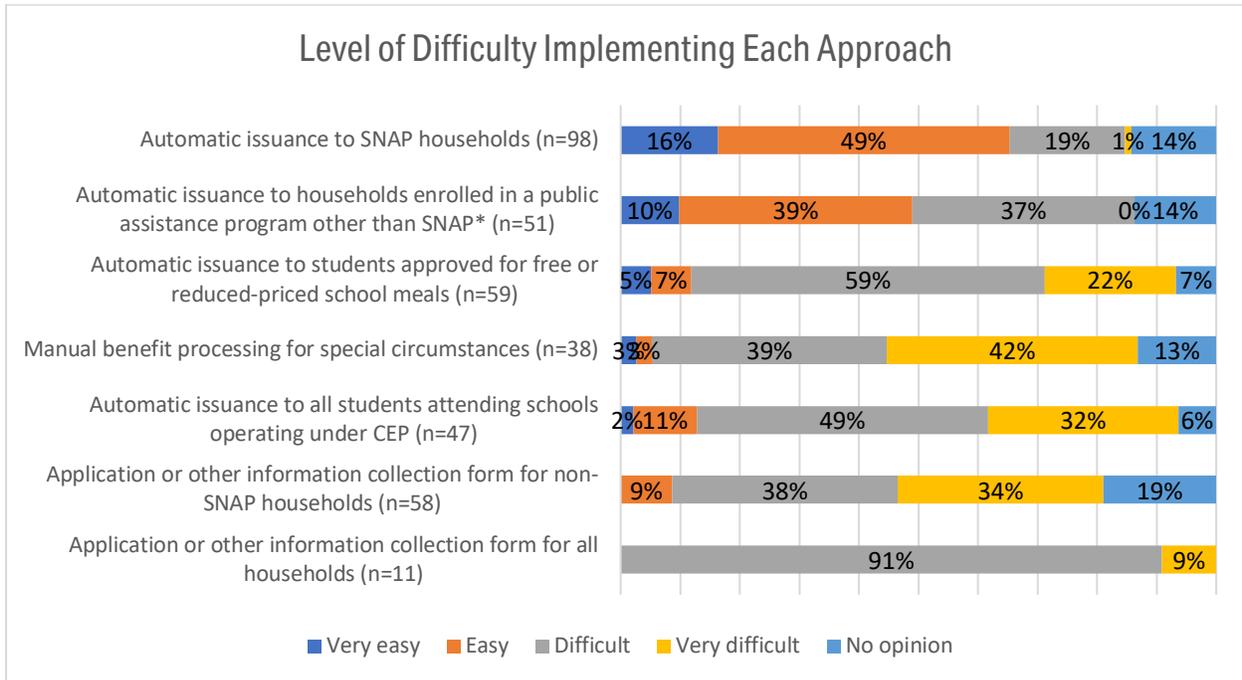


Figure 6: Responses to survey question "For each approach you used, please indicate the level of difficulty to implement." Sorted from very easy to very difficult. Opinion question, so percentages were calculated on total respondents. N=123

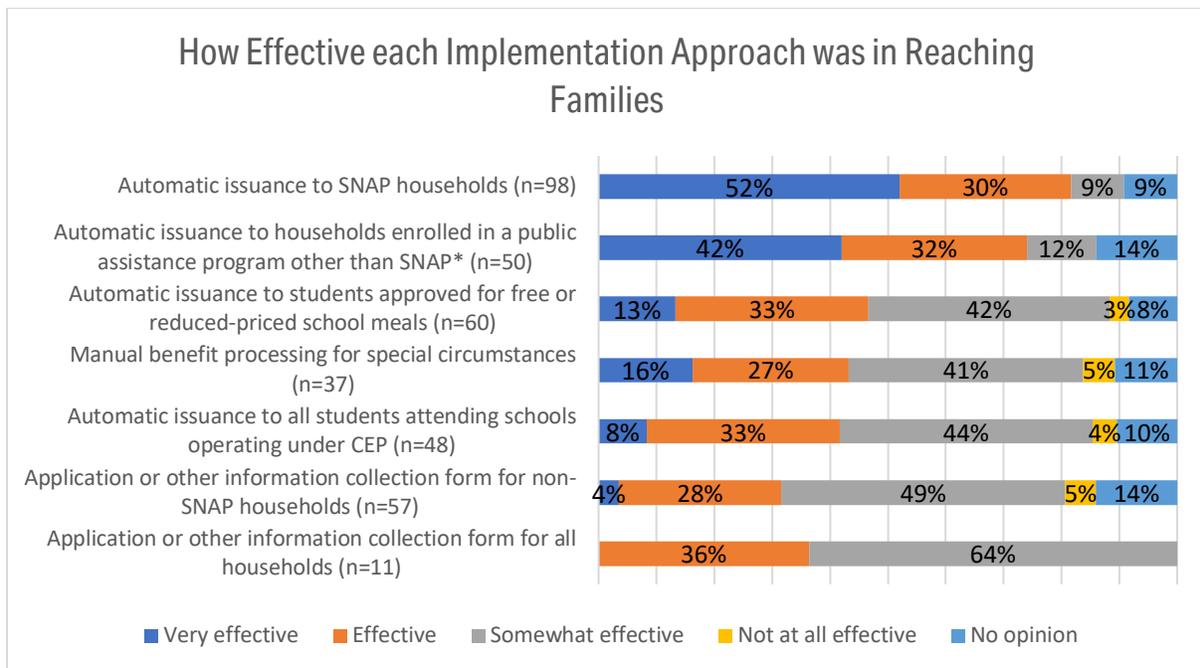


Figure 7: Responses to survey question "For each approach you used, please indicate how effective it was in reaching that group of eligible families." Sorted in the same order as level of difficulty for easy comparison. *Such as TANF, Medicaid, etc. Opinion question, so percentages were calculated on total respondents. N=122

Implementation Phases

Depending on the completeness and accuracy of available student data, states broadly categorized eligible children into groups in order to implement P-EBT in phases. States typically began with the groups of children to whom they

could most easily issue benefits - typically children in households receiving SNAP benefits - and finished with the children who required extra steps in order to issue benefits, such as children recently placed in foster care, because manual benefit processing was necessary.



“There are still issues, but I don’t think there are a lot of other programs set up at the federal level and implemented at the state level that can get that much benefit out to that many people in 90 days.”

– State SNAP official

Phase 1: Children in households already receiving SNAP – As described above, this group was the easiest for states to reach and the process was most efficient. In all states, the majority of these children are directly certified (automatically enrolled through a data matching process) for F/RP school meals, are known to the SNAP eligibility system, and someone in their family already has an EBT card. This group accounts for roughly half of P-EBT eligible students nationwide based on CBPP estimates.

Despite the fact that children who receive SNAP are automatically income-eligible for school meals, USDA required most states to ensure that children in SNAP households were enrolled in a school that participated in the National School Lunch Program, even though nearly all SNAP recipients do attend such schools. In at least some states, a portion of children enrolled in SNAP could not be successfully matched to F/RP eligibility lists from education authorities due to issues like names being spelled differently, typos, or transposed numbers so state SNAP agencies could not simply add P-EBT benefits to the household’s SNAP EBT account.²³ In addition, states were under a time pressure to issue benefits quickly, and schools and districts may have lacked the staff capacity to manually clean-up the data because the school year had already adjourned. In these instances, children had to be served through the mechanism for non-SNAP households in later phases explained below (e.g. direct issuance of a new P-EBT card to the household or the

²³ In the context of directly certifying children in households receiving SNAP benefits for free school meals, states have made substantial progress over the last decade in improving data matching and overcoming issues like these. Nonetheless, states still do not successfully match all children for direct certification purposes. In the context of implementing P-EBT quickly under difficult circumstances, states might not have employed all available data matching improvements. See <https://fns-prod.azureedge.net/sites/default/files/resource-files/NSLPDirectCertification2016.pdf>.

state required the household to submit an application), which delayed benefits and in many cases was more burdensome on state agencies and families.

Phase 2: Children enrolled in other assistance programs – Twenty-nine (29) states were able to leverage information about students enrolled in programs other than SNAP, such as TANF, Medicaid, Foster Care, and/or other assistance programs to issue P-EBT benefits directly without requiring any action by families (see Table 4). In some states, these children had been directly certified for F/RP meals, just like children enrolled in SNAP. Although these children are known to a state's SNAP or other program eligibility system, their families typically do not have existing EBT cards. States opting to issue P-EBT benefits to these children did so either by issuing a new P-EBT card or adding funds to an existing EBT card (e.g. in New York P-EBT benefits were deposited onto existing Medicaid cards.)

Phase 3: Additional children approved for F/RP meals – A significant portion of children eligible for P-EBT were not receiving SNAP or another assistance program used to facilitate P-EBT direct issuance. This group includes children approved for F/RP school meals through a paper application process, or because the school operates under Provision 2, Provision 3, or the Community Eligibility Provision.²⁴ State SNAP and education officials had to figure out how to build a list of students approved for F/RP meals. States took one of two approaches to do this:

- **Direct Issuance:** Use existing information from education partners to mail a new P-EBT card to the address on file with the school, without requesting additional information from the family. Twenty-seven (27) states took this approach. In these states, families did not have to take an action to request P-EBT benefits, unless there was missing or inaccurate data and then some action was needed.
- **Application (or other information collection):** Require parents to proactively apply for P-EBT or respond to a data-collection form, which typically required the student's name, date of birth, and current mailing address. Details on application fields have previously been described in Application section of the report. Twenty-five (25) states took this approach for at least some children, including four states that used applications for a small portion of their caseload (AL, AR) or to catch families missed by direct issuance (AZ, MT).

²⁴ Provisions 2 and 3 allow schools and districts to provide meals at no charge to all students. School districts are reimbursed based on applications collected every few years. More information on CEP can be found in the following reports <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf> and on CEP and Provision 2 here <https://frac.org/wp-content/uploads/frac-facts-offering-free-breakfast-to-all-students.pdf>.

Phase 4: Problem resolution + newly eligible children – Many states found that the implementation timeframe took longer than they originally planned due to the unanticipated need to resolve issues for the minority of families where the established process did not work smoothly. Some states referred to this as their “clean-up” phase.

In states that directly issued benefits to all families, agency staff worked with families, for example, whose mailing addresses had changed and, therefore, never received their P-EBT cards, whose benefits were deposited on the EBT card of a non-custodial parent, or where students were inadvertently left off of their school's enrollment list.

In states with applications, by comparison, states needed to research cases where student data submitted by parents on an application did not match the master eligibility list from schools, either because names were spelled differently, birth dates were different, or some other reason. Some interviewed states also described using this final phase to “sweep up” any children who became eligible for P-EBT after the cutoff dates for earlier phases. As of the completion of this study, a few states with a full school year and states including children ages infant through five were also announcing extensions to the period of application through the end of September.

Eligibility Confirmation

All children in households receiving SNAP benefits are automatically eligible for F/RP school meals. School districts are required to conduct school meals enrollment without completing an application through a process known as direct certification for SNAP (matching the names of children living in households that participate in SNAP) to school enrollment records. States and school districts also may match school enrollment records with data from TANF cash assistance, Medicaid in some states, Foster Care, Homeless/Migrant Services, or the Food Distribution Program on Indian Reservations (FDPIR).²⁵ This match is then used to certify students for free or reduced-price school meals without the need for their families to complete a school meals application.

FNS did not permit states to issue P-EBT benefits to all school-age children who were participating in SNAP households. Instead, in all but a few FNS Northeast Region states, FNS required states to confirm that children receiving SNAP were currently enrolled in a school that participated in the National School Lunch Program (NSLP) before issuing P-EBT benefits.²⁶ This requirement added to the complexity of implementation for states and increased the likelihood that eligible children would be missed. It was intended to exclude the small number of children in SNAP households who are home-schooled or attend

²⁵ A glossary describing these programs can be found in Appendix A.

²⁶ A few states (e.g. New York) issued P-EBT benefits to all school age SNAP recipients (ages 5-18) without requiring confirmation of their attendance at a NSLP-participating school, based on modified guidance from FNS.

one of the few schools that do not participate in the NSLP, but likely excluded others who could not be successfully matched with school meal records and had to receive benefits like other non-SNAP households.

For non-SNAP households, states had to build a master eligibility list for P-EBT from school records and other sources (described above). In direct issuance states, this master list included addresses and was used to mail P-EBT cards directly to eligible children. In application states, this master list was used to confirm eligibility of families who completed the P-EBT application and track who received benefits to avoid duplicate issuance.

Issuing Benefits

Eligibility System

FNS' original P-EBT guidance instructed states to "use existing case information" to issue benefits to SNAP households and to propose "how they will set up new cases and issue cards and benefits to non-SNAP households."²⁷ While many states did adapt existing SNAP eligibility systems to accommodate P-EBT, 16 states developed workarounds to bypass their eligibility systems, as shown in Figure 8. Many states still use older computer systems to issue SNAP benefits that can be costly and difficult to reprogram.

Although bypassing the eligibility system may have been the most economical and expedient choice in the midst of a crisis, these states, like Pennsylvania and Minnesota, may have a harder time updating this information for future P-EBT distributions or another longer-term need. Unlike a database or an eligibility system, these data files are static and function more like a collection or repository. In Minnesota, it would have taken too long to change the current eligibility system to implement P-EBT, however the public school student database is dynamic and updated regularly so in the case of an extension they would still have to reconcile between the static data files and the updated student database. This is an area where future research with administrative data could be helpful to better understand whether any of these approaches outperformed others in reaching subgroups of eligible children with redeemed benefits in the short or long term.

²⁷ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-CN-COVID-PEBTGuidance.pdf>

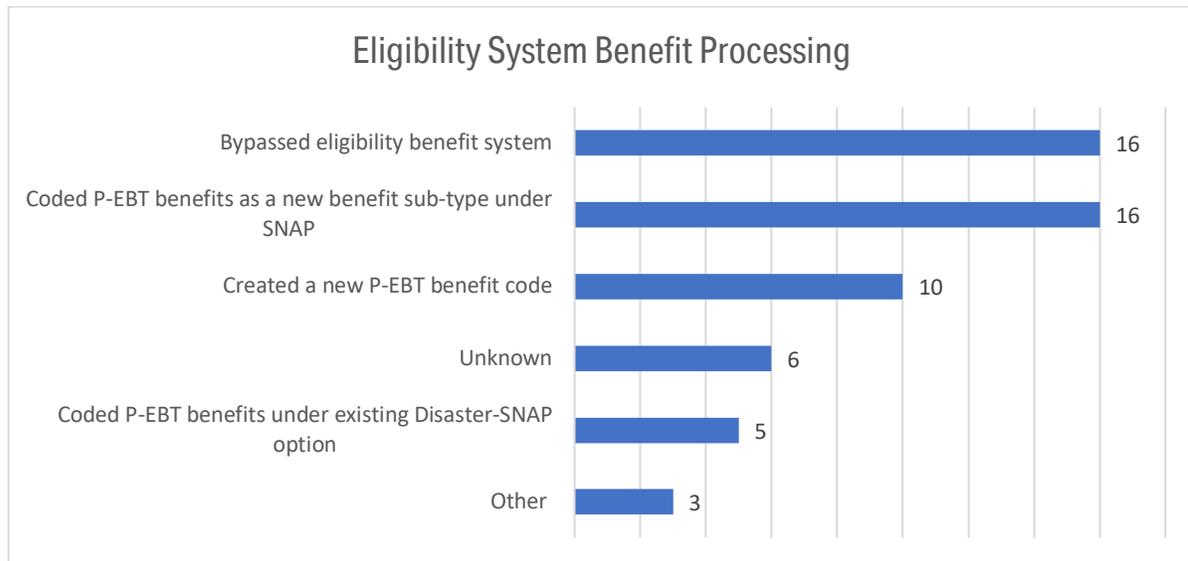


Figure 8: Responses to survey question "How did your state handle processing and issuing P-EBT benefits within your existing public assistance eligibility system?" Other/write-in responses include: 1) manual underpayment process under SNAP for SNAP households, 2) coded P-EBT benefits under existing summer lunch code, 3) used the discontinued sales tax on food program coding's and programming framework. Includes one aggregate response per state, but some states used more than one way to process benefits for different models/phases. N=56

Costs

As described earlier, FNS required states to cover 50% of administrative costs associated with P-EBT, following SNAP state administrative cost-sharing. Some states mentioned that it was difficult to find new resources to pay for necessary administrative costs and may have influenced decisions about making expensive technology changes to support issuance. The federal government typically provides administrative funding for child nutrition programs, including the NSLP, which P-EBT was designed to replace.

The primary costs states described incurring while implementing P-EBT came from:

- **EBT vendors**, who printed and distributed new P-EBT cards to millions of new families on behalf of states, which required amending existing contracts with EBT vendors.²⁸
- **Information technology vendors**, who are contracted with to design, maintain, and modify state eligibility systems for SNAP and other public benefits.

²⁸ Louisiana was in the midst of a transition from one EBT vendor (Conduent) to another (Inmar) in June 2020, which complicated P-EBT implementation and resulted in their P-EBT application period being very limited. Louisiana later reopened the P-EBT application during the month of September.

- **Staff time**, which some states used liberally, for example to stand up new processes and keep up with a high volume of parent inquiries. Staff either worked additional hours or were reassigned from regular duties to P-EBT, meaning that other work did not get done.
- **Call center vendors and non-profit partners**, already under contract who expanded an existing call center (e.g. Hunger Solutions' Minnesota Food HelpLine) or stood up a brand-new call center (e.g. Maximus in Texas) to help states manage the influx of inquiries related to P-EBT.

Not all interviewed states reported making significant investments in order to implement P-EBT. One state, for example, was able to make use of unspent funds in their existing contract with the state's EBT vendor before the end of the



"We looked into having contractors help, but if a vendor isn't already on board, it takes too long to turn on a new contract."

– State Child Nutrition official

contract period. In another state, the IT vendor who manages the state's eligibility system made systems changes necessary for P-EBT at no additional charge to the state. Another area of interest for future study would be on the administrative costs paid by states and FNS to implement P-EBT for the first time, in school year 2019-2020.

Issuing P-EBT Cards to the Child or Head of Household

Another implementation issue that arose for states was whether to issue the P-EBT card to the child or the parent. Like many other aspects of implementation, the availability of student-level data impacted states' card issuance processes. The April 15 P-EBT Question and Answer document from FNS provided some direction to states:

"Ideally, eligible children who are not members of a current SNAP household will be grouped with other eligible children in the household and one card will be issued to the head of household. If the head of household cannot be identified with available student records, the state may use an application to obtain information on the head of household or may issue the benefit "to the parent or guardian of" the child."²⁹

Several states reported that this FNS guidance, combined with the long-standing practice in SNAP of issuing benefits to the head of household, meant they never considered issuing P-EBT benefits to anyone other than the head of household. Nine states were able to directly issue P-EBT benefits to the head of

²⁹ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-PEBTQA.pdf>

household. But since parent/caregiver information was often unavailable through student information systems, an application or form was often the only available mechanism to capture this information.³⁰ According to survey data, the remaining 15 of the 24 states that issued P-EBT benefits to the head of household required P-EBT applications from at least some families.

By comparison, states seeking to avoid an application process for P-EBT found that issuing a P-EBT card in the child’s name, rather than to a head of household, meant that all necessary information could be found in existing data sources and benefits could be issued without eligible families taking action.

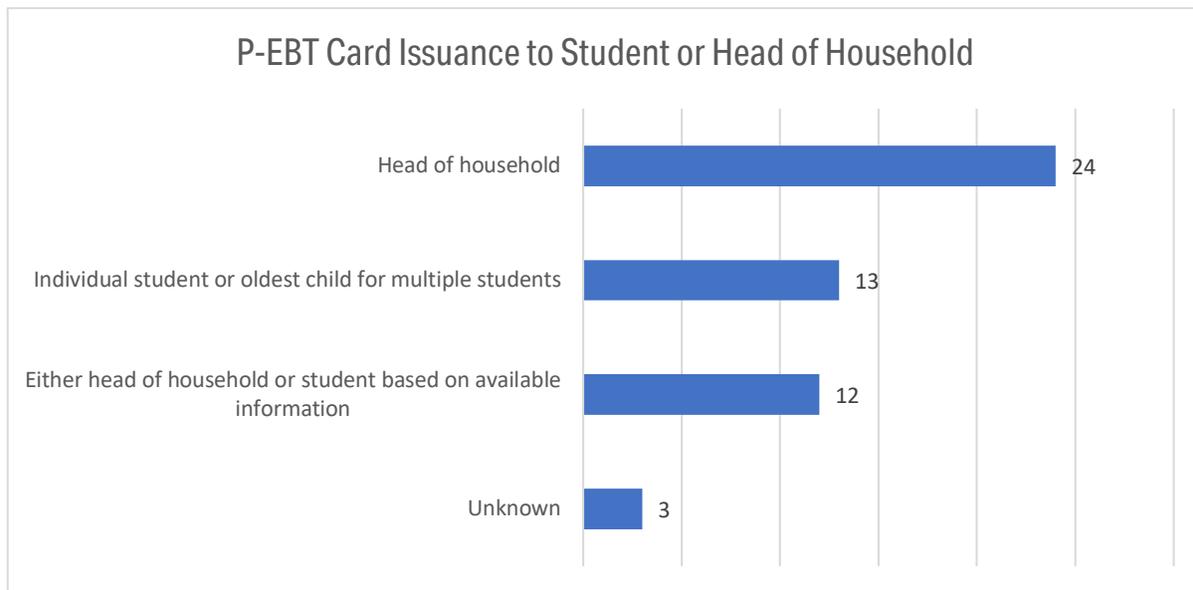


Figure 9: Response to survey question "Who did your state issue new P-EBT cards to?". Includes one aggregate response per state. N=52

As shown in Figure 9, 12 states reported issuing cards through a combination of methods (head of household, oldest sibling, individual student), based on data availability. This made messaging to families more complicated, since several sets of instructions for card activation (described below) were often needed, depending on the person named on the card. Several states interviewed that reported that if they could start over with P-EBT, they would issue benefits to students rather than head of household to avoid "mixed messaging and confusion." States that issued at the child level did not report encountering these same problems.

³⁰ It is unclear whether EBT vendors also influenced whether or not states issued P-EBT benefits to a head-of-household. Interestingly, 8 of the 9 states/territories issuing P-EBT benefits at the individual child-level were states where Conduent was the EBT vendor.

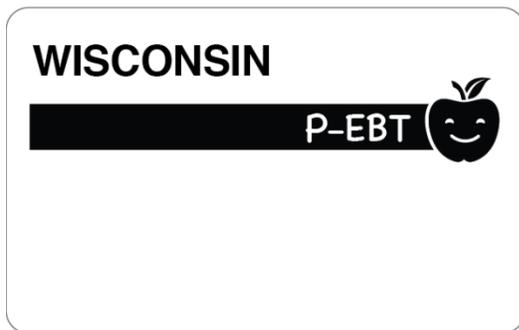


Figure 10: Sample P-EBT card for Wisconsin, produced by FIS



Figure 11: Sample P-EBT card for Louisiana, produced by Conduent

Benefit Card Appearance

For families who were issued a new EBT card, 36 states utilized generic cards that mentioned "P-EBT" designed by the two main EBT vendors, FIS and Conduent (shown in Figures 10 and 11). These cards are identified as "P-EBT specific" in Figure 12. P-EBT-specific cards could be more quickly mass produced by the EBT vendors who were reporting experiencing cardstock limitations and helped distinguish the P-EBT program from SNAP, which may have helped some families feel more comfortable using the cards. In the other 16 states, P-EBT benefits were issued on the same type of EBT cards used for SNAP benefits, as shown in Figure 12. Some states believed that using existing SNAP card stock would help legitimize the new program, as the cards would be more recognizable to families and retailers alike. One interviewed state also felt that using existing card stock would be more efficient in the long run, as families new to EBT might eventually apply for SNAP, at which point the card could be reloaded.

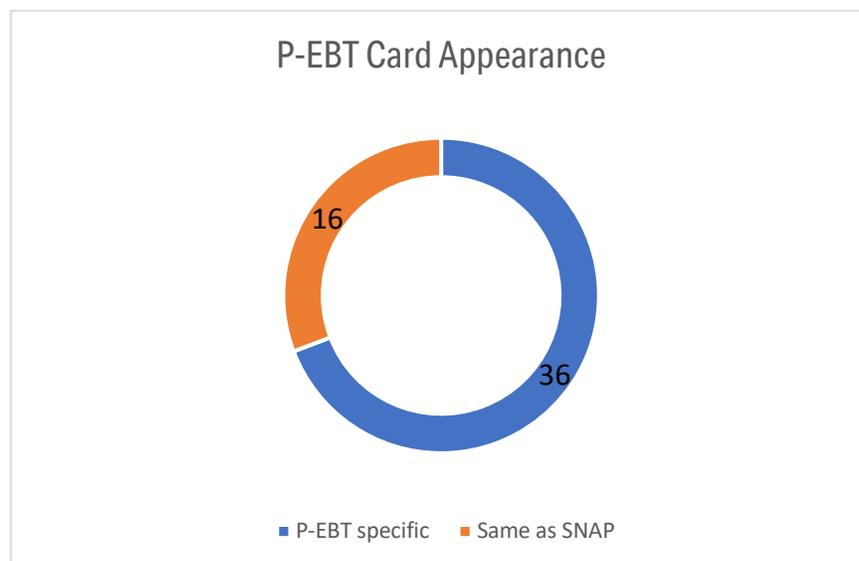
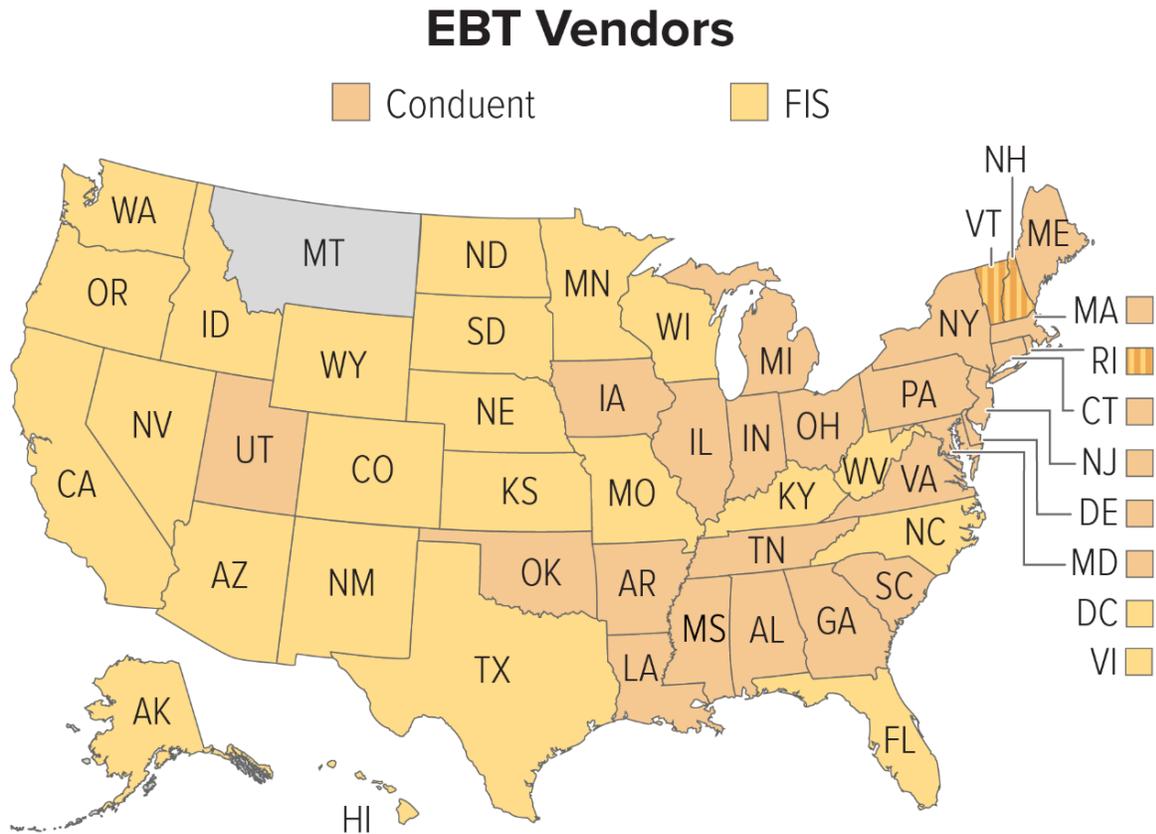


Figure 12: Based on publicly available information or interviews with state officials and advocates. Includes one aggregate response per state. N=52

EBT Vendors

The following map indicates which EBT vendors are used by which states.³¹



Note: There are a few exceptions to the two primary EBT vendors - Louisiana's EBT vendor for benefits issued after June 30 is Inmar, Montana's is Solutran, and New Hampshire, Rhode Island, and Vermont have a combination of Conduent and FIS.

Figure 13: Map of EBT vendors by state

Benefit Card Activation

Card activation, also referred to in some states as card "pinning," is a series of steps an EBT cardholder needs to complete to create a Personal Identification Number (PIN) so they can use the card at a grocery retailer. States came up with a variety of creative approaches to handle card activation.

EBT cards for SNAP are typically activated with the head of household's Social Security Number (SSN) and Date of Birth (DOB). In the case of P-EBT, however, one or both of these data elements were not always

³¹Per the USDA's June 22, 2020 EBT Status Report by State which can be found here: <https://fns-prod.azureedge.net/sites/default/files/resource-files/ebt-status-report-state.pdf>

available for setting up EBT accounts, since schools are not allowed to collect SSNs as part of the application for F/RP school meals and FNS did not allow states to require SSNs on P-EBT applications.³² While many states still used the head of household's SSN as the default option for card activation, they needed to have an alternative procedure, such as calling the agency for a special activation code, for instances where an SSN was not available. Direct issuance states, in particular, developed unique approaches based on available student data, such as the first 4 digits of a student's zip code (Pennsylvania), or the student's 4-digit birth year (Ohio).

TABLE 7

P-EBT Card Activation Options

State	6-digit student DOB	6-digit HOH DOB	4-digit student YOB	Last 4 digits of student SSN	Last 4 digits of HOH SSN	Generic number ^a	Zip code	Other
Alabama		X					X	
Alaska ^b								
Arizona	X							Case #
Arkansas	X					X		
California	X						X	
Colorado					X			Created code
Connecticut ^c	X	X		X	X	X		
Delaware	X					X		
District of Columbia	X						X	
Florida								Unknown
Georgia		X			X	X	X	
Hawai'i	X						X	
Idaho	X						X	
Illinois	X	X		X	X	X		
Indiana	X							
Iowa	X					X		
Kansas					X			Security code
Kentucky	X	X			X			Student ID #
Louisiana				X	X	X		
Maine				X				

³² See FNS' P-EBT Q&A at <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-PEBTQA.pdf>

TABLE 7

P-EBT Card Activation Options

State	6-digit student DOB	6-digit HOH DOB	4-digit student YOB	Last 4 digits of student SSN	Last 4 digits of HOH SSN	Generic number ^a	Zip code	Other
Maryland	X					X		
Massachusetts			X					System generated student PEBT case #
Michigan	X							
Minnesota							X	
Mississippi								Unknown
Missouri		X						
Montana								Call and sign up for PIN #
Nebraska		X					X	
Nevada							X	
New Hampshire		X			X			
New Jersey	X					X		
New Mexico	X						X	
New York				X				4-digit student DOB
North Carolina	X							
North Dakota		X					X	
Ohio			X					
Oklahoma			X					
Oregon								
Pennsylvania	X						X	
Rhode Island	X							
South Carolina	X			X				
South Dakota		X			X		X	
Tennessee								
Texas					X	X		Last 2 digits of HOH DOB

TABLE 7

P-EBT Card Activation Options

State	6-digit student DOB	6-digit HOH DOB	4-digit student YOB	Last 4 digits of student SSN	Last 4 digits of HOH SSN	Generic number ^a	Zip code	Other
Utah	X							
Vermont						X		Oldest student 8-digit DOB
Virgin Islands	X			X			X	
Virginia				X		X		
Washington							X	
West Virginia	X						X	
Wisconsin ^d								
Wyoming		X			X			
TOTAL	23	11	3	8	11	12	16	

HOH stands for Head of Household. DOB stands for date of birth. YOB stands for year of birth. SSN stands for Social Security Number.

^a Examples: 0000, 1234, 5555

^b Unknown

^c 6-digit DOB and generic number 0000 for SSN for cards sent to student receiving public assistance, otherwise 6-digit DOB and cardholders last 4 of SSN

^d Unknown

Sources: Nationwide survey responses. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

With the relevant 4 or 6-digit code in hand, families needed to call a toll-free number, operated by the EBT vendor in that state, and follow the automated prompts which include entering the full card number and the cardholder's date of birth. This is the same process all states use to activate new EBT cards for SNAP. In states where Conduent is the EBT vendor, advocates reported that a common inquiry from families arose from the fact that the automated telephone prompts were not customized for P-EBT and instructed all families to enter the last 4 digits of the cardholder's SSN, regardless of the mechanism their state developed for P-EBT card activation (shown in Table 5). State advocates observed that several strategies were used to inform families about the alternative procedure designed for P-EBT, including sending card activation instructions by mail and adding automated messages on call center hold lines, but some degree of confusion remained. This confusion was one of the most commonly reported inquiries from families in our survey (see Troubleshooting section below for more information).

Card activation data from a few direct issuance states provided early insight into how well P-EBT implementation was going in these states. In Massachusetts, where a lot of thought and effort was invested in outreach, advocates reported that as of August 6, 2020 - approximately two months after the bulk of P-EBT cards were distributed directly to eligible non-SNAP families - 84% of P-EBT cards had been

activated.³³ This excludes P-EBT benefits that were directly issued to current SNAP recipients on an existing EBT card. Ohio officials reported similar activation rates (just over 80%) to advocates on August 8, 2020. This data suggests that (1) confusion over card pinning instructions did not ultimately undermine most families' ability to activate P-EBT cards and (2) sending P-EBT cards directly to eligible non-SNAP families without requiring an application successfully delivered benefits to a high-percentage of eligible families. Another area for further research once administrative data is available would be to compare the P-EBT card activation rate and the share of eligible children whose cards were activated for children in households not receiving SNAP benefits across states and models.

Single vs. Multiple Benefit Issuances

FNS' original guidance to states suggested that P-EBT benefits be provided "on a monthly basis through the end of the state's calculated average date for the end of the regularly scheduled school year."³⁴ The earliest states to apply and be approved for P-EBT largely took this approach, issuing more than one P-EBT allotment to eligible families that varied based on the number of missed school days in those months. For example, Wisconsin, a state whose P-EBT plan was approved by FNS on April 22, provided an initial payment of \$176 for March and April and a second payment of \$148 for May and June. Early adopter P-EBT states did not know whether schools would re-open again to finish out the 2019-2020 school year, context that likely informed their decision to issue benefits in two payments. Multiple issuances also ensured that families received P-EBT benefits closer to the time that school meals were missed.

In most states, however, by the time agencies were issuing P-EBT, the school year was coming to a close or already had ended, so 34 states chose to issue benefits as a one-time payment as shown in Figure 14 below. States reported that a one-time payment was simpler to communicate to families, as it eliminated the need to explain why P-EBT deposits varied each month and reduced the expectation that P-EBT benefits would continue beyond June 2020, which a few states we interviewed that provided multiple P-EBT issuances faced. Going forward, P-EBT will likely be implemented towards the beginning or middle of the school year, necessitating multiple payments and, therefore, better communication.

³³ Zip code level P-EBT card activation data as of 8/6/2020 was provided by the Massachusetts Department of Transitional Assistance (DTA) to its community partners to support localized outreach efforts.

³⁴ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-CN-COVID-PEBTGuidance.pdf>

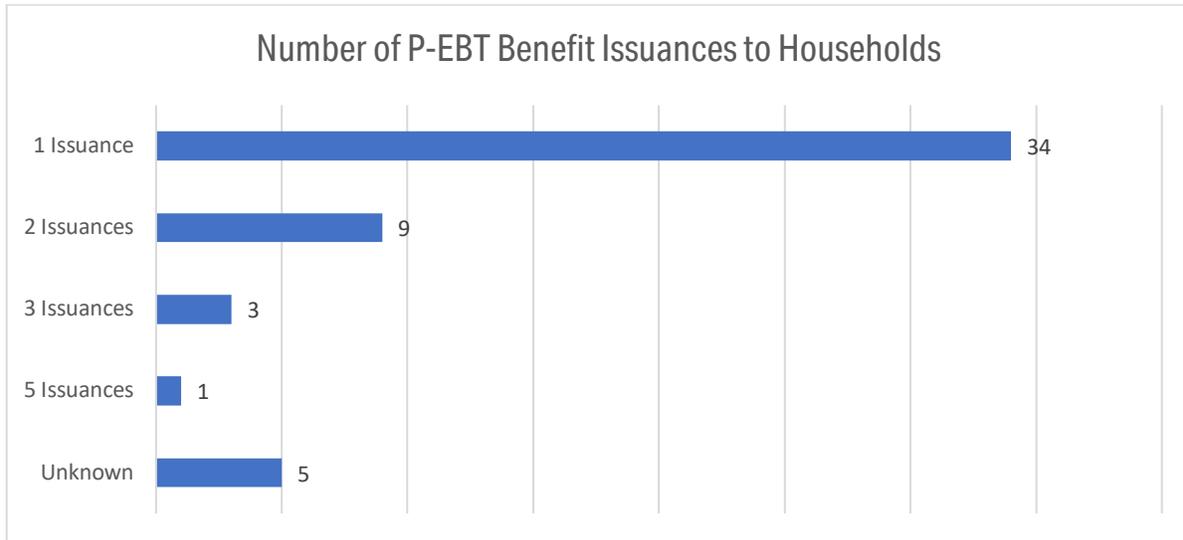


Figure 14: Based on publicly available information or interviews with state officials and advocates. Includes one aggregate response per state. N=52

Communication and Troubleshooting with Families

As with any new benefit or resource for families, effective communication is critical to success. Households, particularly with a new benefit, can be confused about what the benefit is, what steps they need to take to access it and how to use it. These types of issues may well have been exacerbated during the roll out of P-EBT since it was occurring during the pandemic and normal information-sharing channels were disrupted.

States took a variety of approaches to inform families about the availability of P-EBT, which can be categorized into three distinct types, ranging from the least to most specific - communication with the public, communication through schools, and direct communication with families. Anti-hunger and child advocacy organizations supported and extended these communications efforts.

Communication strategies looked somewhat different in direct issuance vs. application states, given the nature of what parents/guardians needed to do to access P-EBT benefits for children in their care. In general, direct issuance states pursued less intensive communication strategies than application states, since families were expected to receive P-EBT benefits without needing to take any action.

Communication with the Public

Because all states were required by FNS to conduct a public information campaign about P-EBT, nearly all states utilized basic communication strategies, such as issuing press releases and posting information on state websites, as shown in Figure 15. A majority of states also used social media platforms (e.g. Twitter,

Facebook) to spread the word about P-EBT and answer frequently asked questions. A smaller number of states also leveraged high-profile public figures, including Governors, First Spouses, and Mayors to broadly spread the word about P-EBT through public service announcements and pandemic-related press conferences.³⁵

Anti-hunger and child advocacy organizations sought to ensure community organizations that work directly with families, as well as parents, were informed about the new benefit and related procedures. They hosted webinars, developed informational flyers and social media posts in multiple languages, and virtually convened state partners and direct service providers to ensure eligible families knew about and felt comfortable using P-EBT benefits.



"The P-EBT program helps ensure that families continue to have access to healthy food as some schools, and subsequently some school lunch programs, remain closed due to COVID-19. I encourage eligible Texans to apply for these benefits so they can continue to provide food for their families during these challenging times."

– Governor Greg Abbott of Texas³⁶

Communication through Schools

State agencies and advocates generally expected schools to be the best vehicle for communicating with eligible families about the availability of P-EBT, since they had the closest relationship to families of enrolled students and P-EBT was designed to replace meals typically received at school. The information generally shared with school districts included:

1. General information about P-EBT, including what it is, who qualifies, how benefits are calculated, and where it could be used.
2. *In direct issuance states:* How parents can update their mailing address before or after P-EBT cards were mailed to families.
3. *In application states:* The public or private application link for parents to request P-EBT benefits from the SNAP agency.

Most states requested but did not mandate schools communicate with families about P-EBT. A notable exception is Texas, which required its 1,200 school districts to communicate directly with families on

³⁵ See "Pandemic EBT Funds are on the way!" a Public Service Announcement from Ohio First Lady Fran DeWine with local professional baseball mascots. Available at <https://youtu.be/P6XruTwpdtQ>

³⁶ From state press release on July 28, 2020, available at <https://gov.texas.gov/news/post/governor-abbott-hhsc-extend-deadline-for-pandemic-food-benefits-for-families-affected-by-covid-19-school-closures-2>

multiple occasions to ensure they had access to the P-EBT application link. Other states provided flyers, memos, and/or sample messaging for schools to distribute to families through school communication platforms at their own discretion.

Child Nutrition agencies, who typically served as liaisons between school districts and SNAP agencies, reported that school districts varied widely in their interest and ability to communicate with families about P-EBT. In states that launched P-EBT in April and May, schools were standing up virtual learning platforms and addressing internet connectivity problems all while staff worked from home, which made it difficult for messaging about P-EBT to rise to the top of the priority list. Other states launched P-EBT in the summer after the end of the school year, a time when school administrators were not working and therefore not available to disseminate P-EBT messaging.

Separate from the challenging timing of P-EBT implementation, some school administrators did not see P-EBT as their responsibility, unless explicitly asked to facilitate communication with families. Many districts were also in the process of implementing grab-and-go meals program through the summer nutrition programs to meet families' immediate food needs. Many states and advocates described this as a missed opportunity where no one entity was to blame. Things were simply moving too fast and coordinated communication plans never fully materialized.

Some school districts utilized their communications channels to promote P-EBT. In these school districts, families received texts, emails, and robocalls letting them know about P-EBT, how it worked, and how to access the benefit, including details about the application process, and in some direct issuance states, asking families to quickly update their address information before data was shared with the state for P-EBT card issuance.

One example of school district communication efforts is the Philadelphia School District who took a proactive approach to update families' addresses. The district sent messages out through robocalls and emails to families to remind them to update their address and created a process to update addresses in real time.

Communication Directly with Families

States took different approaches to communicating directly with eligible families about the P-EBT benefits. States generally focused their communication efforts to non-SNAP families who were unfamiliar with SNAP and how EBT cards work. To serve these families, state SNAP and Child Nutrition agencies developed flyers and Frequently Asked Question (FAQ) documents which were posted online and distributed through schools and other community-based partners. (*See Resource Library for sample materials.*) P-EBT cards mailed to families from the EBT vendor typically came with a letter including basic

information about the program and instructions for activating the card. Some states (e.g. New York, Pennsylvania) also mailed letters to non-SNAP families explaining the program in advance of the vendor mailing the P-EBT card.

One area some states focused on more than others was translation of the application and/or communication materials. Lack of translated materials is a particular concern for reaching eligible children living with family members who do not speak English. Three (3) states translated applications into multiple languages- Missouri being the most aggressive translating their application into six (6) languages, followed by Minnesota that translated it into five (5). Eleven (11) states only translated materials into Spanish and at least six (6) states did not translate the application at all.³⁷ Some states that had phone applications used language interpretation services to collect the information needed in multiple languages, and some states translated outreach materials into more languages than the application or registration form.

Another area of communication that some states appear to have overlooked was information targeted at SNAP families who received P-EBT benefits on their existing SNAP EBT card. FNS' guidance did not require states to contact (e.g. send a notice) SNAP households when issuing the P-EBT benefit.³⁸ A few interviewed states (e.g. Arizona, Pennsylvania) mailed information about the new benefit to SNAP households.

Interviewed states reported that confusion among SNAP families generated a significant volume of calls and inquiries to the state SNAP and Child Nutrition agencies implementing P-EBT. Confusion was likely exacerbated by the fact that households were also seeing increases to their SNAP monthly allotments as a result of SNAP Emergency Allotments (also authorized by FFRCA) to families at the same time. (See *"Common Inquiries" Chart under Troubleshooting section below.*) SNAP supplements through the Emergency Allotments are often issued by state SNAP agencies on a different day than when the household's basic benefit is issued. Some households may have been confused by seeing two supplements added to their benefits (one for P-EBT and one for the Emergency Allotment.)



"P-EBT was a tremendous value. My son eats a lot and he was here with me every day. My husband works second shift and I can't really leave my desk to go pick up some food from his school. I did try the food pantry at a local church, but I had to wait in line for 5 hours, beginning at 5am. They were giving out 380 tickets and I was number 303. I can't go through that again."

– A working mom in Wisconsin

³⁷ We were unable to find this information in publicly available documents for five states.

³⁸ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-CN-COVID-PEBTGuidance.pdf>

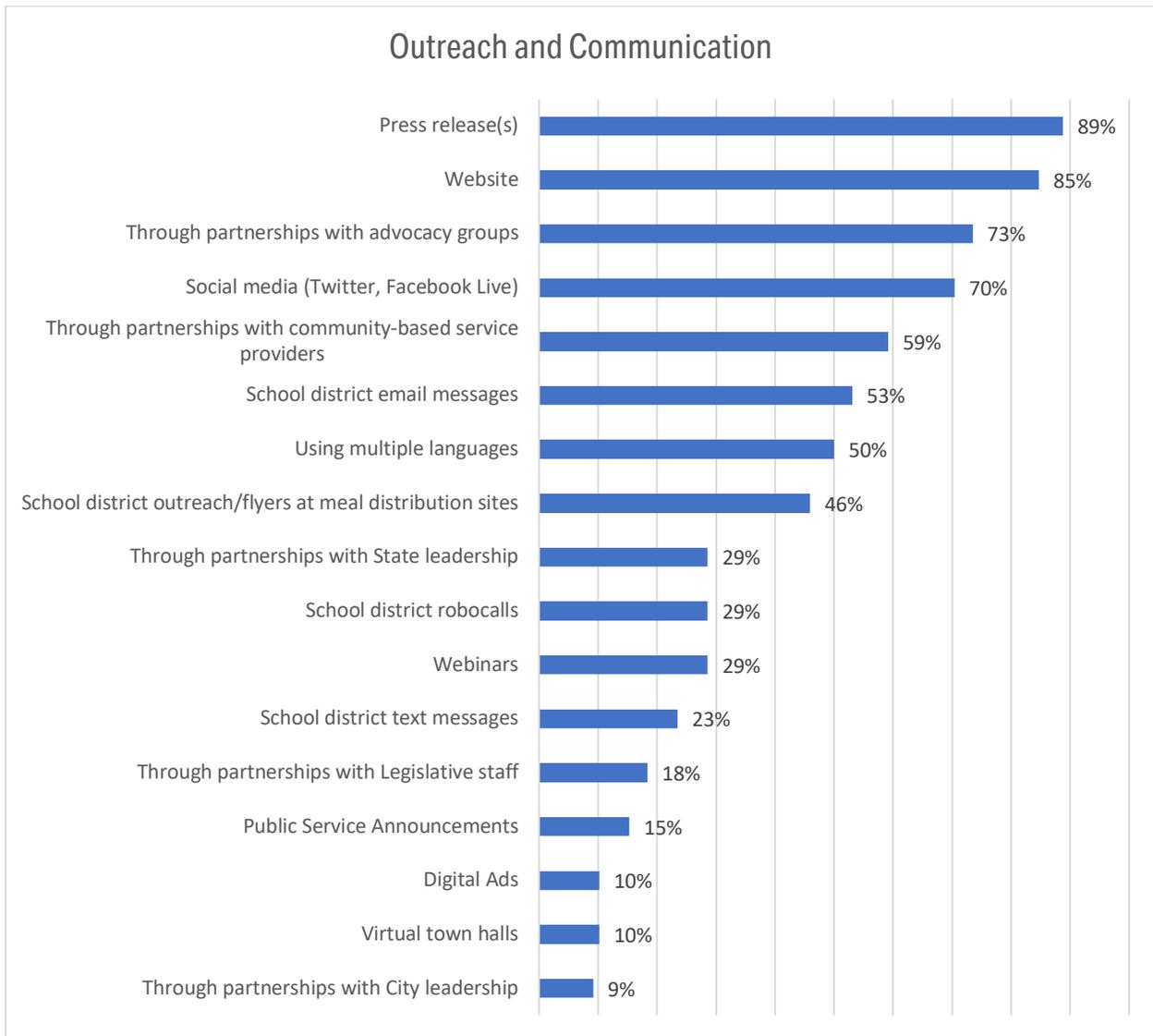


Figure 15: Responses to survey question "What types of P-EBT outreach did your state conduct? (select all that apply)". Percentages were calculated on total respondents. N=98

Targeted Outreach

Some states, in partnership with schools, advocates, and other community partners, went much further to spread the word about P-EBT. For example, some advocacy groups and community-based partners funded digital, radio, and television advertisements to generate community awareness in advance of states' application deadlines. These outreach campaigns often tailored messaging for specific audiences and were executed in multiple languages.

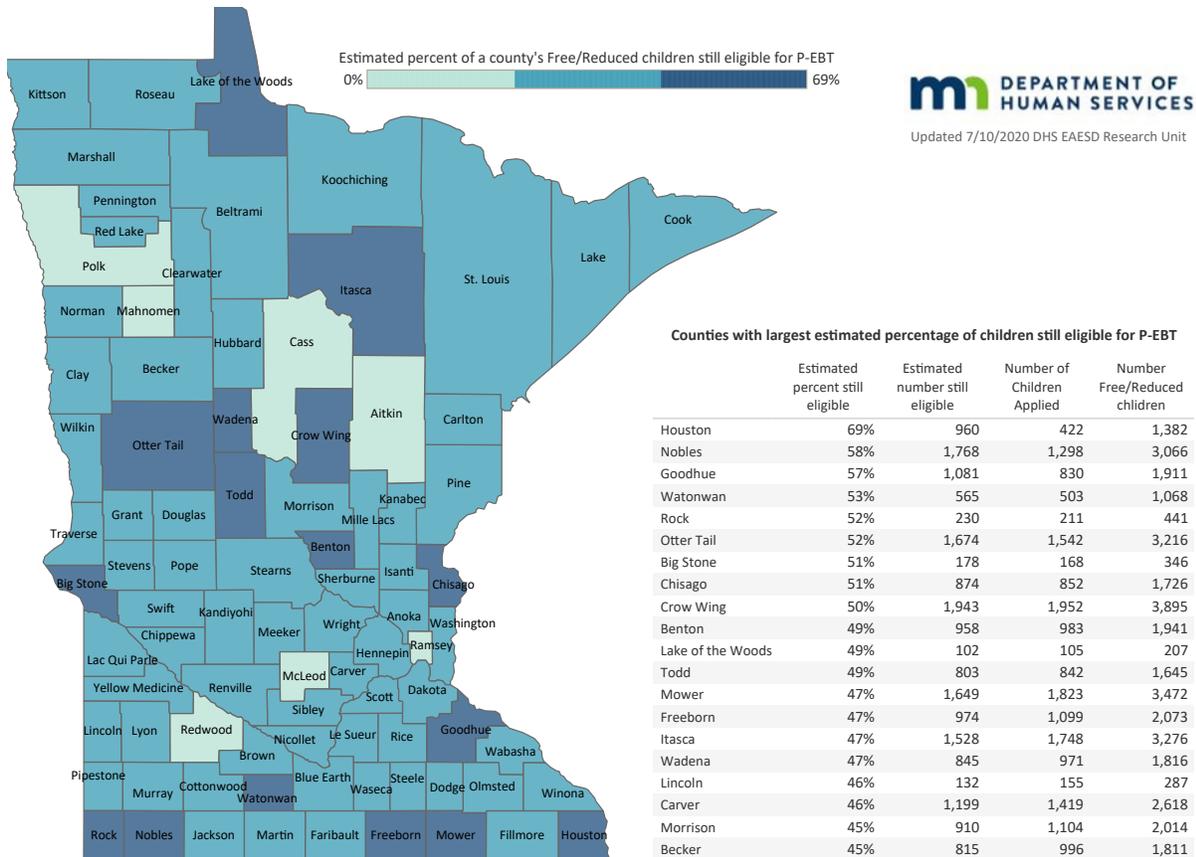
A smaller number of states, including both application and direct issuance states, used administrative data on application submissions and P-EBT card activations at the zip code and county level to generate maps and reports of which areas of the state had eligible but unenrolled P-EBT households. This allowed them to target their outreach efforts, which may have been more effective but comparative outcomes are not yet available. Some states that implemented a targeted, data-driven method were:

Massachusetts: In this direct issuance state, the SNAP agency regularly shared zip code and city-level data with advocates, schools and other outreach partners showing the percentage of P-EBT cards that had been activated to date. Because P-EBT cards were issued in the name of each individual child, the state viewed activation data as a real-time proxy for the percentage of children in non-SNAP households successfully reached by P-EBT (and comparable to application figures used in the states described below). As of August 6, 2020, 84% of all P-EBT cards in Massachusetts had been activated, ranging from 52% to 100% in cities and towns across the state. This data also showed that the 10 most populous communities all had card activation rates between 81% and 91%.

Outreach partners then leveraged this localized data to focus outreach resources in communities with the lowest card activation rates to ensure families (a) received their P-EBT card or knew how to request a new one, (b) trusted the program, and (c) understood how to activate and use the P-EBT card.

Minnesota: -Hunger Solutions leveraged the data shared by the SNAP agency on estimates of eligible children who had yet to receive benefits (as seen in the figure below) to pay for targeted Facebook and radio advertisements by county. Radio advertisements were also conducted in Spanish which Hunger Solutions reported resulted in an uptick in Spanish application assistance through their HelpLine. The advertisements directed families to the Hunger Solutions website where there was information about the P-EBT program, a link to the application, as well as the Food HelpLine phone number where they could receive assistance applying and an online inquiry form. The social media presence both by the SNAP agency and the advocacy organization highlighted the word of mouth spread of information across families, particularly in Latino and Somali communities.

Estimated percent of free/reduced children still eligible for Pandemic-EBT (P-EBT), by county.



© 2020 Mapbox © OpenStreetMap

Figure 16: Map of estimated percent of a county's children approved for F/RP meals and still eligible for P-EBT. MN Department of Human Services.

Texas: In this geographically large and populous application state, agency leaders and other P-EBT stakeholders viewed localized data on submitted P-EBT applications as an essential tool for effective outreach. For this reason, the SNAP agency regularly provided updated application data at the county and zip-code level to education and advocacy partners who used the information to target paid radio, television, and social media ads. Texas also used submitted application data to inform decisions about whether to extend application deadlines, which they ultimately did twice (first from June 30 to July 31 and then to August 21.)

Responding to Family Inquiries

During implementation planning, states had to consider how to respond to families' inquiries about P-EBT. Given that P-EBT was a brand-new program that states had to develop and implement at the same time, and it was being implemented at a time of unprecedented uncertainty and financial hardship for families, it is understandable that most states received a high-volume of inquiries from parents/guardians and students in need of food assistance, in some cases as soon as the law was enacted in March. As shown in Table 8, 48 states use new or existing call centers to handle parent inquiries. Thirty-eight (38) states created email inboxes for P-EBT, and 19 states created an online inquiry form or benefits status portal.

TABLE 8

Mechanisms for Family Inquiries

State	Call center	Email inbox	Online inquiry form	Online benefit status portal
Alabama	X	X		
Alaska			X	
Arizona	X	X	X	
Arkansas	X	X		
California	X	X	X	
Colorado		X	X	
Connecticut	X	X		
Delaware	X	X		
District of Columbia	X	X		
Florida	X			
Georgia	X	X		
Hawai'i		X		X
Idaho ^a	X			
Illinois	X	X	X	X
Indiana	X	X		
Iowa	X	X		
Kansas	X	X		X
Kentucky	X	X		
Louisiana	X	X		X
Maine	X			
Maryland	X		X	
Massachusetts	X			
Michigan	X	X		
Minnesota ^b	X	X		

TABLE 8

Mechanisms for Family Inquiries

State	Call center	Email inbox	Online inquiry form	Online benefit status portal
Mississippi		X		
Missouri	X	X	X	
Montana	X	X		
Nebraska	X	X		
Nevada	X			X
New Hampshire	X			
New Jersey	X			X
New Mexico	X	X		
New York	X	X		
North Carolina	X			
North Dakota	X	X		
Ohio	X	X		
Oklahoma	X	X		
Oregon	X	X		
Pennsylvania	X	X	X	
Rhode Island	X			
South Carolina	X	X		X
South Dakota	X	X		
Tennessee	X			
Texas	X	X		
Utah	X	X	X	
Vermont	X			
Virgin Islands	X	X		
Virginia	X		X	
Washington	X	X		X
West Virginia	X	X	X	
Wisconsin	X	X		
Wyoming	X	X		
Total	48	38	11	8

a May add additional mechanisms for contact once further into implementation

b Minnesota also piloted Jabber software to support their response to family inquiries

Sources: Nationwide survey responses or publicly available information on state websites or in press releases when available. State SNAP agencies were offered an opportunity to review each element in this table to confirm or update information. We will update this information to reflect any corrections or clarifications we receive from states.

Reasons for Inquiries

States did not provide administrative data on the number of families who contacted the state with a question about P-EBT, but survey respondents were asked to report the most common inquiries received from families related to P-EBT. As shown in Figure 17, three of the top five responses relate to seeking information (specifically about P-EBT eligibility, benefit status, or card status), while the other two most common responses relate to reporting problems (benefits missing for some children and card activation problems).

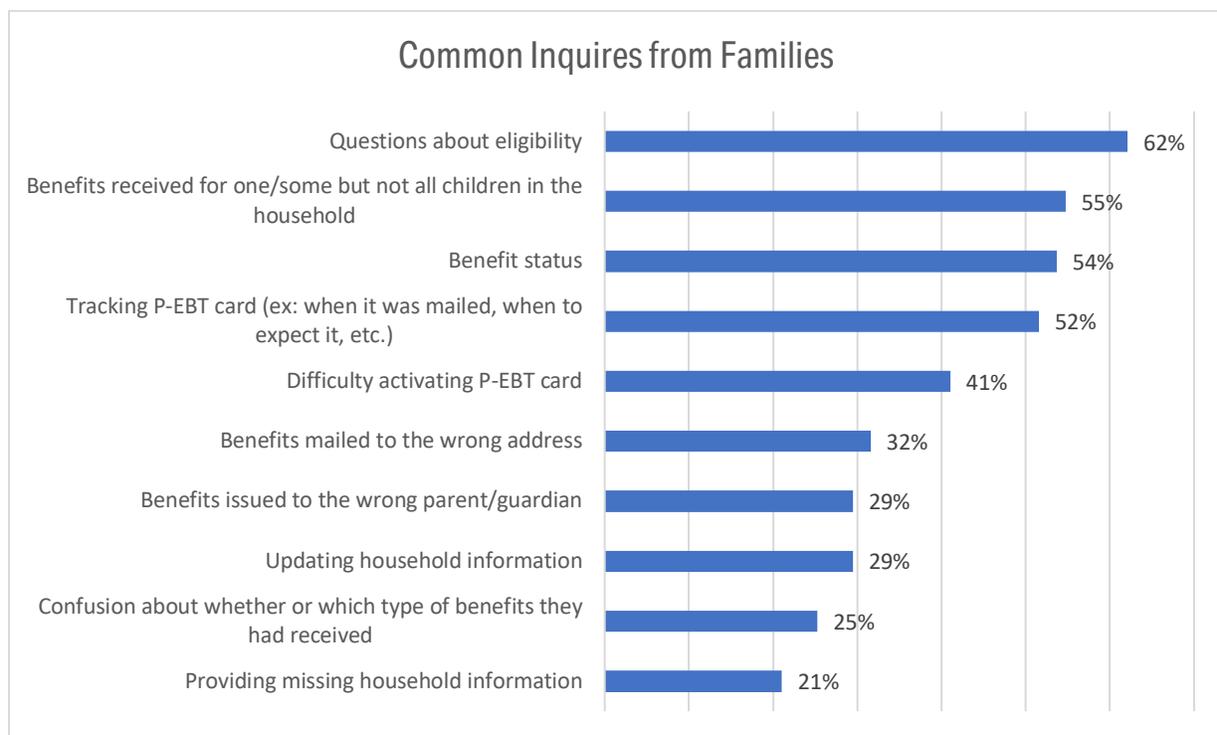


Figure 17: Responses to survey question "What were the most common inquiries from families regarding P-EBT benefits? (select top THREE)" Percentages were calculated on total respondents. N=95

Inquiry Backlogs

While some states prepared for an influx of parent inquiries, several states interviewed for this study would have benefitted from more cross-agency advance planning to develop a system for triage and resolution. In these states, large inquiry backlogs emerged due to:

- Lack of clarity for parents about which entity (schools, SNAP agency, Child Nutrition agency) was best positioned to answer and resolve their questions;
- Staffing levels being out of sync with the volume of inquiries being received; and/or
- Misalignment between public communication about P-EBT and the timing of card issuance.

In Pennsylvania, for example, where there are an estimated 1 million eligible children, the Child Nutrition agency created an online inquiry form for families who had not received some or all of the P-EBT benefits expected through the state's direct issuance process. The SNAP agency also had an email inbox set up for inquiries related to P-EBT. Before all P-EBT cards had even been mailed, the Child Nutrition agency had received more than 17,000 inquiries with only 5 staff members available to review and respond to each inquiry. During the same time period, Pennsylvania's SNAP agency reported receiving 1,500 email inquiries per day, with 6 full-time staff and 10 part-time staff available to respond. Although the SNAP and Child Nutrition agencies were well coordinated and in constant communication, they could not quickly tell which inquiries were duplicates and had already been handled by the other agency. To work through the backlogs, the agencies began using an automated response with an overview of the P-EBT program, an updated issuance timeline, and other troubleshooting tips in order to address the most common questions.

Troubleshooting

For this report, troubleshooting refers to how states resolved P-EBT cases that did not work out as planned. This typically required agency staff to do case-specific research, such as gathering all relevant information (e.g. child name, birth date, address, school name, etc.), contacting the school to confirm eligibility, ensuring a P-EBT benefit had been issued, and confirming the mailing address. As noted above, when sufficient staff were not available to support the troubleshooting process in real-time, inquiry backlogs emerged.

In some states, a few central issues - such as card pinning confusion in Massachusetts or opt-in letters for children attending CEP schools in Alabama - made up the bulk of parent inquiries, allowing states and community partners to concentrate resources on resolving a few specific problems. Other states found themselves with a wide variety of emerging issues, making it challenging to pull in and train additional staff for troubleshooting. This was especially true for states with robust direct issuance *and* application processes for P-EBT, like Kansas and Wisconsin, both of which were interviewed for this report. (*See Case Studies on these states for more information.*)

States took great care to reach as many eligible children as possible, even if a substantial amount of staff time to resolve issues was required. In Alabama, for instance, the SNAP agency allowed families who believed they had been inadvertently left out of the direct issuance process to receive P-EBT if they provided some proof of eligibility, such as a report card from a CEP school. In Wisconsin, P-EBT applicants were granted the same appeal rights afforded to SNAP applicants, and every denied P-EBT application was reviewed by state agency staff for accuracy.

All of the states interviewed for the project had staff that went above and beyond to resolve even the most complex cases that could only be handled through manual intervention. Some examples of cases that required detailed attention include:

- Children experiencing homelessness
- Children in foster care, some of whom were still connected to their biological parent's SNAP case
- Children with divorced parents where the non-custodial parent's address was on file with the school
- Low-income children excluded from P-EBT due to being home-schooled or attending a private school (sometimes for special needs reasons) not participating in NSLP
- Children in tribal communities with PO boxes and unreliable mail delivery
- Children whose P-EBT cards were returned to the EBT vendor, either because the address on file with the school district in March was out of date, or because the family had moved since the pandemic began.

Until final administrative data is available on how many children were ultimately able to access P-EBT, the share of cases that required troubleshooting cannot be assessed. What can be said is that many states took the responsibility to reach every possible child seriously, including the most complex cases.

Staffing

Implementation of P-EBT required a significant commitment of staff time by states, including state employees and, in some cases, vendors contracted to extend existing staff capacity. As noted above, the amount of staffing that states were able to dedicate to P-EBT seems to have directly impacted how quickly

and effectively they were able to troubleshoot problems with families. For example, states like Texas that invested in large call center teams to troubleshoot problems and answer questions avoided the large inquiry backlogs and application processing delays that lesser-resourced states faced. Among interviewed states, the extent to which they had sufficient staffing to handle these inquiries seemed to make the biggest difference between states in which staff felt positively about P-EBT implementation, and those in which staff had mixed feelings.

States did not submit administrative data on staff time expended to implement P-EBT, however, the survey asked respondents for an estimate of the, "number of full-time equivalent staff" their state dedicated to P-



"P-EBT is pretty much all we have done since the plan was submitted, with the intensity ramping up as issuances began and public expectations were raised."

– State Child Nutrition official

EBT during the busiest period of implementation. Respondents may have interpreted the question differently, so their answers may not be comparable. For example, some state respondents may have estimated a “head count” and others may have given an estimate of Full Time Equivalencies (FTEs). While the survey data is the opinion of respondents, not objective data, analysis suggests that responses from the same state were fairly consistent across stakeholders (i.e. SNAP, Child Nutrition, and in some cases, advocates placed their state in the same FTE range) and may serve as a useful jumping off point for future research.

As shown in Figure 18, 16 states said they dedicated 10 FTE or fewer to P-EBT implementation, while 7 states were able to dedicate more than 100 FTE. The amount of staffing that states said they were able to dedicate to P-EBT does not appear to be correlated with the implementation model (i.e. application vs. direct issuance) or the size of the state. According to survey respondents, the states dedicating 75 or more FTE to P-EBT were 4 relatively small states (Alabama, Minnesota, Missouri, North Dakota) and 5 larger states (Arizona, California, Michigan, North Carolina, and Texas.) Texas was the one outlier, reporting over 1,000 FTE, including vendor staff in the statewide call center.

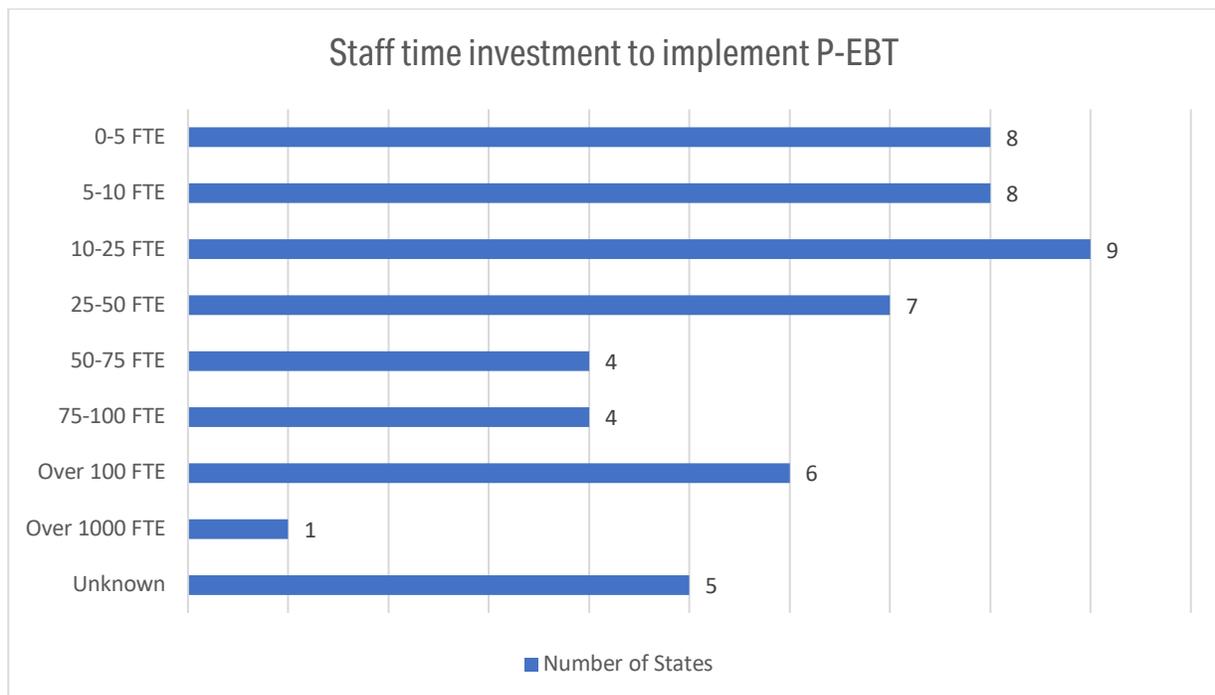


Figure 18: Responses to survey question “What time investment was required from your agency during the busiest part of P-EBT implementation?” Includes one aggregate response per state. N=52

Outcome Tracking

Although administrative data are not yet available to determine the success of P-EBT implementation efforts across states, survey respondents shared the types of information they already or intend to track to measure their effectiveness.

The majority of states reported tracking the number of eligible children issued P-EBT benefits to date, as well as the amount of benefits issued, both of which are required by FNS. Half of state agency respondents are tracking the number and share of returned cards, which is especially important in direct issuance states that did not request updated mailing addresses from families. Less than half of state agency respondents are tracking the number and share of newly issued P-EBT cards that have been activated, likely as a proxy for children who received and where able to use the benefits.

Other metrics that could be considered in future studies include the impact on food insecurity among eligible families, the impact and efficacy of communication and outreach efforts, and the take-up rate on the different types of applications.

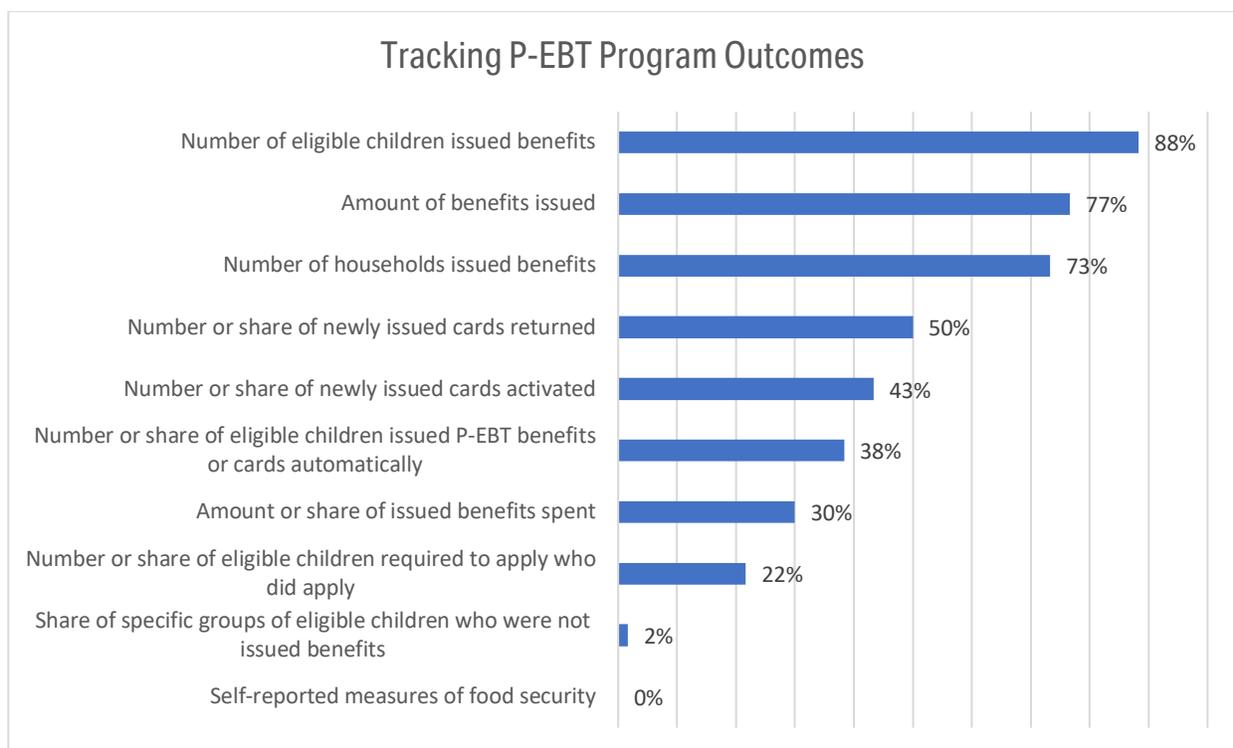


Figure 19: State agency responses to survey question "What P-EBT program outcomes have you been tracking or are you planning to look into? (select all that apply)" Percentages were calculated using state agency respondents. N=60

Lessons Learned

The structure and rapid roll-out of P-EBT presented many challenges for states but there are early lessons learned from the successes, and improvements that can be made based on the shortcomings of the first implementation of the program. It appears the major driver for state decisions about implementation was the availability of student data and the associated challenges of interfacing with SNAP EBT systems. Direct issuance to children was the model that appears to have worked best, and yet for a majority of states the comprehensive student data needed to issue benefits did not exist in one place and had to be laboriously gathered up. This might be one reason not every state was able to issue P-EBT benefits to children whose families became newly eligible for F/RP meals because of job loss related to the pandemic.



"I am most proud of my staff. This is way outside of their responsibilities and roles. They worked really hard to make things happen in order to get families through this pandemic."

– Child Nutrition director

As of the writing of this report, Congress has extended P-EBT for the 2020-21 school year, but no guidance has been issued by FNS. There is also a likelihood that a program like P-EBT will need to be implemented again in the future. For these reasons this study has been rapidly conducted so lessons learned can be gleaned for the second implementation.

The following are high-level lessons learned synthesized from the data, observations, and opinions gathered during this study. The P-EBT program is still new and complete outcome data is not yet available on the first school year of implementation. (Early indications of participation rate data are available from EBT card activations and benefit redemption in some states, but not all.) Therefore, this report did not seek to distill best practices or recommendations for state implementation of P-EBT in the future. State officials will have the option to implement P-EBT again in the 2020-2021 school year, so this report focuses on the early lessons learned that may be useful for federal, state, and local officials moving forward. Recommendations for future research once outcome data are available have also been identified.

Lesson 1: The P-EBT program worked to provide food assistance to millions of school-aged children during a crisis and it took impassioned and dedicated federal, state, and local staff to make it happen. Implementing P-EBT programs in response to a crisis required an incredible amount of work at the federal, state, and local level during unprecedented times and at a rapid pace. These efforts highlighted the committed and compassionate public servants in this country who were willing to go above and beyond to make sure school children had food.

52 states successfully implemented the program for the first time in the 2019-2020 school year, and early evidence shows the majority of P-EBT benefits were distributed to eligible children quickly and efficiently through new or existing EBT cards. A subset of cases required significant state resources, which presented challenges to states. One lesson learned by many states is the importance of creating a process and notifying families who are newly eligible because their financial circumstances worsened about how to apply for F/RP school meals.

Every state that we spoke to emphasized the importance of providing states with adequate administrative funds to appropriately staff any future P-EBT implementation.



“Despite obstacles with implementation, this program provided millions of students with much needed food benefits to help them and their families in an extremely tumultuous time. The true value in the program lies in its ability to reduce food insecurity among our students and their families in the middle of this public health emergency.”

– State SNAP official

Lesson 2: Direct issuance to children was the model that worked best based on early reports. The area with the most need for further research when outcome data is available is the question of which benefit issuance method was “most effective” defined by the proportion of eligible children who were reached by the program. It appears, based on survey data and a few examples of state outcomes, that issuing benefits directly to children is the least burdensome system for families and states, as long as a state also includes a straightforward system for families to reconcile or resolve issues if they are missed.

Direct issuance allowed many states to dispense with applications as the primary route to reaching families. States that used the direct issuance approach still needed to have an established process to catch those children who were missed due to data or system errors, including ways to collect information by phone for families without internet access.

One interesting lesson learned by direct issuance states who were seeking to avoid an application process for P-EBT was that issuing a P-EBT card in the child’s name, rather than to a head of household, meant that all necessary information could be found in existing data sources and benefits could be issued without eligible families taking action.

Another important lesson learned from direct issuance states is the importance of sending letters to SNAP households to notify them that additional P-EBT benefits were being issued to their SNAP card. States reported receiving many inquiries from SNAP families who didn’t realize they had already received and spent their benefits along with their SNAP benefits. SNAP families that did not receive notices were especially confused because they didn’t know when the P-EBT benefit had been deposited in their

account, or the amount of the benefit. As a result, some SNAP families who called or emailed the troubleshooting point of contact because they believed they were missed learned they had already redeemed their benefit.

Lesson 3: States need resources to improve the reliability of student data (how frequently it is updated) and interoperability of F/RP meals data and student enrollment data with their SNAP systems. This will be especially important with future P-EBT implementations as school districts within states will have different operating status and students within schools will have different schedules (opting in or out of in person learning) and could change throughout school year.

During the first implementation, some states benefited from readily available statewide student information systems and processes that were already in place for direct certification, but most states had to collect student data from multiple sources and then compile and clean it. F/RP meals information is typically gathered only once a year at the beginning of the school year, so by April it is outdated for some families. School enrollment data may be kept more up to date, but there is also limited interoperability of systems, which directly contributed to the challenges states faced in issuing benefits. For example, data matching was more challenging than some states anticipated because data fields for things like the name and address were not the same. Better data could have improved states' likelihood of being able to issue benefits directly to households without extra work for state agency staff or households.

Another issue that states addressed unevenly was how to handle children who became newly eligible for F/RP meals after school buildings closed. Some states provided families with clear instructions on how to apply for F/RP meals so they would be added to the P-EBT list. Thirteen (13) other states did not create a process for newly eligible children to apply.

Nearly all states had to build a master eligibility list for P-EBT, either to prepare for mailing P-EBT cards or to validate incoming P-EBT applications. It is unclear whether states realized the necessity of creating a master eligibility list when they developed their implementation approach early on. This was a significant undertaking, regardless of whether or not a state utilized P-EBT application or other information collection form.



"P-EBT is really meeting a need, especially for rural folks who weren't able to drive to feeding sites and for schools that weren't distributing food."

– Child Nutrition director

Lesson 4: Troubleshooting benefit issuance was required for some children in every implementation approach- direct issuance, application, or a hybrid. Although overall it appears direct issuance states that issued to children had fewer challenges to contend with, they did have to troubleshoot issues for families like outdated addresses, returned mail, and families- in some cases that were not sent a notice explaining the benefits- inadvertently throwing out plain white envelopes with P-EBT cards because they did not know to expect them.

By contrast, application states had fewer issues with bad addresses, but still had to contend with data that didn't match *and* had to quickly to build widespread awareness about a brand-new program, during a time when normal communication channels, especially schools, were either pre-occupied or entirely unavailable.

One lesson learned about decreasing the volume of troubleshooting contacts families make is the importance of sending a notice to every household with a child receiving P-EBT, including SNAP households.

Finally, 13 states that used direct issuance did not provide a way for families to apply if they were missed in the school data. The magnitude of this problem is difficult to assess in the early results. This is another very important area for further research and study, especially if direct issuance becomes the most prevalent way states implement P-EBT.

Lesson 5: It was important to enhance collaboration and communication amongst the P-EBT partners in state agencies, advocacy organizations, and with families. One early lesson learned is the importance of collaboration and joint planning between the SNAP and CN states agencies. The states where collaboration occurred early were better able to anticipate data challenges and coordinate on external communication and troubleshooting.

Many state SNAP and Child Nutrition agencies and community partners were collaborating in a new and more intense way and had to quickly determine the most efficient roles and responsibilities. Strong, coordinated communications plans, especially those directed at parents and schools, were critically important, both for outreach and for troubleshooting with families. Nearly all interviewed states said if they got a do-over they would build stronger outreach and public education campaigns. In retrospect, it became clear that states that devoted time and attention to communications from the beginning, with a focus on school partnerships to improve direct communication to families, had to answer fewer inquiries from confused families. Some states described this as their biggest "missed opportunity." For example, states that communicated with families before cards were issued were less inundated with inquiries once cards were mailed.

The amount of resources that states were able to dedicate to the program directly impacted how effectively agency staff and families perceived how they had implemented P-EBT. For example, states that had large call center teams to troubleshoot problems and answer parent questions avoided the large inquiry backlogs and application processing delays that lesser-resourced states faced.

Areas for Further Inquiry

It was an honor to gather data from states while they were either still completing the implementation of the first P-EBT program or had just recently finished implementation. Details about how implementation decisions were made, and why, were fresh in respondents' minds. Interviewees still had raw emotions about the monumental effort they and their teams had expended and were still expressing a passionate commitment to aiding families who are struggling during the pandemic. The facts and opinions presented in this report are a first look, and we welcome the more in-depth, longer-term studies that will come after this one, especially since Congress extended the P-EBT program to the 2020-21 school year. To those future researchers, we recommend digging deeper into the following topics we were unable to study:

1. The perspective of FNS staff and the administrative successes and challenges of implementing P-EBT. (Unfortunately for this study we were unable to survey FNS staff.)
2. The perspective and role of EBT vendors. (Unfortunately, for this study we were unable to survey or interview any of the vendors.)
3. In-depth research on the P-EBT participants, through an equity lens, contrasting different implementation models, to better understand the participants' preferences and experience, including difficulties using P-EBT for no-contact shopping like curbside pick-up and delivery.
4. Contrasting state implementation models by the rate of participation by different subgroups like SNAP and non-SNAP, proportion of cards activated, and redemption based on administrative data, to identify correlations and/or trends.
5. Variation in participation rates by different sub-populations, like children living in households with immigrants, children living in rural communities, families experiencing homelessness, and other special-needs groups. Also looking at participation by age of child, and by family income, especially for children in CEP schools.
6. Determining and contrasting the administrative costs, including staffing requirements, by implementation models based on administrative data, to identify correlations and/or trends. Also studying what states would have wanted to fund compared to what they were able to afford.
7. The distribution of data quality issues across states, and the degree of centralization and level of effort required to compile.

8. Differences between states that were early adopters and states that waited longer to determine if there were differences in participation rate or ease of implementation.
9. The effect of P-EBT on school meal / summer meal participation since disbursement occurred during summer months.
10. The effect of P-EBT on SNAP enrollment for those that were not enrolled before P-EBT.
11. The overall impact P-EBT had on food insecurity and hunger.

Appendices

Appendix A – Glossary

CEP: The Community Eligibility Provision is a federal option that allows high-poverty school districts to serve breakfast and lunch at no cost to all enrolled students at some or all schools without collecting household applications. Reimbursements are based on the share of students directly certified for free or reduced-price meals (as explained in the next entry).

Direct certification: Children participating in certain programs (SNAP, TANF, Medicaid in some states, Foster Care, Homeless/Migrant, and Head Start) may or must be automatically enrolled for free or reduced-price school meals based on a data matching process or information from a relevant official instead of a household application.

Direct issuance: Issuing P-EBT benefits to eligible households without requiring a parent/guardian to take any action, such as submitting an application. Some states referred to this as “automatic issuance.” It includes benefits loaded onto existing SNAP cards and benefits loaded onto new P- EBT cards that were mailed to families.

DOB: Date of birth

FDPIR: The Food Distribution Program on Indian Reservations (FDPIR) provides USDA Foods to income-eligible households living on Indian reservations, and to American Indian households residing in approved areas near reservations or in Oklahoma.

F/RP: Free or reduced-price school breakfasts and lunches provided through the School Breakfast Program and the National School Lunch Program and available to children with household incomes below 185 percent of the federal poverty line.

HOH: Head of household of the student(s); another term for parent/guardian.

Homeless/Migrant: Children who receive educational support through the McKinney-Vento Homeless Assistance Act, the Runaway and Homeless Youth Act, or the Migrant Education Program are eligible for free meals and may be directly certified.

Manual benefit processing: The term “manual benefit process” or “manual process” refers to when state agency staff individually research and process a case.

P-EBT: The Pandemic Electronic Benefits Transfer program was created in the March 2020 Families First Coronavirus Response Act to provide families with benefits they can use to buy groceries to replace the free or reduced-price breakfasts and lunches their children missed while schools were closed for in-person instruction due to the COVID-19 pandemic in the 2019-2020 school year.

SNAP: The Supplemental Nutrition Assistance Program is a federal entitlement program designed to supplement the food budgets of low-income households.

SSN: Social Security number

TANF: Temporary Assistance for Needy Families is a federal block grant provided to states to provide cash assistance and other support to very low-income households with children. Recipients of TANF cash assistance are eligible for free school meals and may be directly certified.



Documenting Pandemic EBT

Introduction

The Center on Budget and Policy Priorities, in partnership with the Food Research & Action Center, is conducting a project to document the implementation of Pandemic EBT (P-EBT). The project seeks to identify the different approaches that states have taken to implement P-EBT and lessons states and stakeholders have learned.

We will compile the survey results and combine them with publicly available information to complete a state-by-state chart summarizing key implementation features, which we plan to publish on our web sites as quickly as possible so that it will be available to you if P-EBT gets extended. We will give at least one official in each state an opportunity to review our summary before publishing it. We will also conduct in-depth interviews in several states to develop more detailed profiles and identify key cross-cutting implementation issues.

This survey **should take about 15 minutes** to complete. You can return to the survey from the same device and browser to pick up where you left off and/or edit responses (using Previous/Next buttons) *until* you click the Done button. It is ok to skip questions that you do not have the answer to. The only required question is the state that you are responding from so we can connect the various implementation approaches to the correct state.

The survey will be open until the end of the day, **Wednesday, August 12th**. This project will be completed by September 2020 and we greatly appreciate your expeditious response given the tight timeframe.

If you have any questions about this survey, you can contact Karin Ellis at karin.ellis@koneconsulting.com. Thank you for taking the time to answer these questions.

Appendix B - Survey

1. What were the biggest factors that determined your approach to implementing P-EBT? (select top THREE)

- P-EBT implementation guidance
- Availability of student information needed to issue P-EBT benefits
- Accuracy of student information needed to issue P-EBT benefits
- System/Technology capacity
- Data-sharing limitations
- EBT vendor limitations
- Urgency of delivering benefits
- Staff capacity
- Leadership from elected official
- Other (please describe)

Appendix B - Survey

2. Please identify which approaches your state used to implement P-EBT. (select all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Automatic issuance to SNAP households | <input type="checkbox"/> Application or other information collection form for non-SNAP households |
| <input type="checkbox"/> Automatic issuance to households enrolled in a public assistance program other than SNAP (such as Medicaid, TANF, etc.) | <input type="checkbox"/> Application or other information collection form for all households |
| <input type="checkbox"/> Automatic issuance to students approved for free or reduced-priced school meals | <input type="checkbox"/> Manual benefit processing for special circumstances |
| <input type="checkbox"/> Automatic issuance to all students attending schools operating under the Community Eligibility Provision (CEP) | |
| <input type="checkbox"/> Other (please describe) | |



Documenting Pandemic EBT

3. For each approach you used, please indicate the level of difficulty to implement.

	Very difficult	Difficult	Easy	Very easy	No opinion
Automatic issuance to SNAP households	<input type="radio"/>				
Automatic issuance to households enrolled in a public assistance program other than SNAP (such as Medicaid, TANF, etc.)	<input type="radio"/>				
Automatic issuance to students approved for free or reduced-priced school meals	<input type="radio"/>				
Automatic issuance to all students attending schools operating under the Community Eligibility Provision (CEP)	<input type="radio"/>				
Application or other information collection form for non-SNAP households	<input type="radio"/>				

Appendix B - Survey

	Very difficult	Difficult	Easy	Very easy	No opinion
Application or other information collection form for all households	<input type="radio"/>				
Manual benefit processing for special circumstances	<input type="radio"/>				
[Insert text from Other]	<input type="radio"/>				

4. For each approach you used, please indicate how effective it was in reaching that group of eligible families.

	Not at all effective	Somewhat effective	Effective	Very effective	No opinion
Automatic issuance to SNAP households	<input type="radio"/>				
Automatic issuance to households enrolled in a public assistance program other than SNAP (such as Medicaid, TANF, etc.)	<input type="radio"/>				
Automatic issuance to students approved for free or reduced-priced school meals	<input type="radio"/>				
Automatic issuance to all students attending schools operating under the Community Eligibility Provision (CEP)	<input type="radio"/>				

Appendix B - Survey

	Not at all effective	Somewhat effective	Effective	Very effective	No opinion
Application or other information collection form for non-SNAP households	<input type="radio"/>				
Application or other information collection form for all households	<input type="radio"/>				
Manual benefit processing for special circumstances	<input type="radio"/>				
[Insert text from Other]	<input type="radio"/>				



Documenting Pandemic EBT

Automatic Issuance

These questions apply to states that used automatic issuance for P-EBT benefits. If your state did not use automatic issuance, the questions on this page can be skipped.

5. For automatic issuance, which public assistance benefit programs did you use to obtain data on children eligible for P-EBT? (select all that apply)

- SNAP
- Medicaid
- TANF
- Foster Care
- Homeless/Migrant Services
- Other (please describe)

Appendix B - Survey

6. For automatic issuance to families receiving SNAP or other public assistance benefits, what information did you use to check eligibility for free or reduced-price school meals? (select all that apply)

- Age
- Student status
- Data matching with Community Eligibility Provision schools
- Data matching with lists of students approved for free or reduced-price school meals
- Other (please describe)

7. For automatic issuance to families not receiving SNAP or other public assistance benefits, how did your state access information on students approved for free or reduced-price school meals? (select all that apply)

- Centralized student information system at state level
- Student data files from school districts
- Student data files from individual schools
- We did not access student data files for direct issuance households
- Other (please describe)



Documenting Pandemic EBT

Automatic Issuance

These questions apply to states that used automatic issuance for P-EBT benefits. If your state did not use automatic issuance, the questions on this page can be skipped.

8. For each option, please indicate whether these lists of approved students existed electronically before P-EBT or if they had to be created.

	Existed before P-EBT	Existed but were augmented for P-EBT	Newly assembled for P-EBT
Centralized student information system at state level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student data files from school districts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student data files from individual schools	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We did not access student data files for direct issuance households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not applicable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
[Insert text from Other]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Documenting Pandemic EBT

Application or other information collection form

These questions apply to states that used an application or other information collection form. If your state did not use an application or form to collect information, the questions on this page can be skipped.

Appendix B - Survey

9. What information was needed to issue P-EBT benefits, but not available, which led you to create an application or other information collection form? (select all that apply)

- First and last name for head of household
- First and last name for student(s) in household
- Date of birth for head of household
- Date of birth for student(s) in household
- Current mailing address
- School district
- School name
- Social Security Number for head of household
- Social Security Number for student(s) in household
- Student gender
- Student identification number
- Signature
- Race
- Ethnicity
- Other (please describe)

10. Please indicate which fields your state requested directly from families on an application or other information collection form and reasons for including. (select all options that apply to each field)

Appendix B - Survey

	Required to Issue Benefit	Mailing EBT Card	EBT Card Authorization	Reconciliation	Program Integrity	N/A
First and last name for head of household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First and last name for student(s) in household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Date of birth for head of household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Date of birth for student(s) in household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Current mailing address	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School district	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School name	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Security Number for head of household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Security Number for student(s) in household	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student gender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student identification number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Signature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please describe)	<input type="text"/>					

Appendix B - Survey

11. What options did families have to complete the P-EBT application or other information collection form? (select all that apply)

Online

Telephone

Paper

Other (please describe)



Documenting Pandemic EBT

12. How did your state handle processing and issuing P-EBT benefits within your existing public assistance eligibility system?

- Coded P-EBT benefits as a new benefit sub-type under SNAP
- Coded P-EBT benefits under existing Disaster-SNAP option
- Created a new P-EBT benefit code
- Bypassed eligibility benefit system
- I don't know
- Other (please describe)

13. Who did your state issue new P-EBT cards to?

- Head of household - one card for each student
- Head of household - one card for multiple students
- To each individual student
- To one student for multiple students in the same household
- Either the head of household or student(s) depending on what information was available
- Other or multiple options (please describe)

Appendix B - Survey

14. How did families activate their P-EBT card(s)?

- Last 4 digits of head of household's Social Security Number
- Last 4 digits of student's Social Security Number
- 4 digit student year of birth
- 6 digit student date of birth
- 6 digit head of household date of birth
- Student identification number
- Generic number (ex: 0000, 1234)
- Zip code
- Other or Multiple Options (please describe)

15. Did your state issue benefits to households who became newly eligible for P-EBT after schools closed? (select all that apply)

- Yes, through automatic issuance to new SNAP households
- Yes, through a P-EBT application
- Yes, through a statewide free or reduced-price school meal application
- Yes, through a school district free or reduced-price school meal application
- No
- Other (please describe)

Appendix B - Survey

16. What types of P-EBT outreach did your state conduct? (select all that apply)

- Press release(s)
- Virtual town halls
- Webinars
- Website
- Social media (Twitter, Facebook Live)
- Digital Ads
- Using multiple languages
- School district outreach/flyers at meal distribution sites
- School district robocalls
- School district email messages
- School district text messages
- Public Service Announcements
- Through partnerships with advocacy groups
- Through partnerships with community-based service providers
- Through partnerships with City leadership
- Through partnerships with State leadership
- Through partnerships with Legislative staff
- Other (please describe)

Appendix B - Survey

17. Please indicate which mechanism(s) were available for families with questions or concerns to make contact and by which agency? (select all that apply)

	Statewide call center	Email inbox	Online inquiry form	Online benefit status portal
The SNAP State Agency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The County SNAP Agencies (where applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Child Nutrition State Agency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The school district	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please describe)	<input type="text"/>			

Appendix B - Survey

18. What were the most common inquiries from families regarding P-EBT benefits? (select top THREE)

- Questions about eligibility
- Benefit status
- Confusion about whether or which type of benefits they had received
- Updating household information
- Providing missing household information
- Tracking P-EBT card (ex: when it was mailed, when to expect it, etc.)
- Difficulty activating P-EBT card
- Benefits mailed to the wrong address
- Benefits issued to the wrong parent/guardian
- Benefits received for one/some but not all children in the household
- Other (please describe)

Appendix B - Survey

19. What time investment was required from your agency during the busiest part of P-EBT implementation?

- 0-5 dedicated FTE
- 5-10 dedicated FTE
- 10-25 dedicated FTE
- 25-50 dedicated FTE
- 50-75 dedicated FTE
- 75-100 dedicated FTE
- Over 100 dedicated FTE
- Not applicable
- Other (please describe)

Appendix B - Survey

20. What P-EBT program outcomes have you been tracking, or are you planning to look into? (select all that apply)

- Number of households issued benefits
- Number of eligible children issued benefits
- Number or share of eligible children issued P-EBT benefits or cards automatically
- Number or share of eligible children required to apply who did apply
- Share of specific groups of eligible children who were not issued benefits (such as racial groups, children who are homeless, English Language Learners, etc)
- Number or share of newly issued cards returned
- Number or share of newly issued cards activated
- Amount of benefits issued
- Amount or share of issued benefits spent
- Self-reported measures of food security
- Other (please describe)

21. Are you willing to share any of your P-EBT program outcome data? If so, you can either upload here by clicking on "choose file" button, or send via email to karin.ellis@koneconsulting.com.

Choose File

Choose File

No file chosen

22. How would you design or implement P-EBT differently if you could do it over again or had more time to prepare?

*** 23. Which state do you represent?**

▼

Appendix B - Survey

24. What is your role in P-EBT implementation?

- State SNAP Program
- County SNAP Program
- Information Technology / Systems Program
- State Child Nutrition Program
- Other (please describe)
- School District
- School
- Advocate
- Community Partner

25. Is there anything else about your experience implementing P-EBT that you would like to share?