

## **State Plan for Pandemic EBT (P-EBT)**

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

**1. Type of Request:** Initial

**2. Primary Citation:** Families First Coronavirus Response Act

**3. State:** Rhode Island

**4. Proposed Alternative Procedures:**

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

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

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

### **Verification of P-EBT Eligibility:**

Existing SNAP households containing children eligible for school lunch are presently identified within the State's eligibility system. Rhode Island's direct certification match is conducted at the state level using data from the RI Department of Education's (RIDE) Student Database system and SNAP data owned by DHS. Rhode Island has an existing Data Sharing Agreement with RIDE for this purpose. These children will be provided a supplemental issuance

equal to the Federal reimbursement rate for breakfast and lunch at the free rate for each eligible child in the household on their current EBT card for the months of March, April, May and June 2020. Demographic information regarding this group will be sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance. The SNAP benefit will be added to the household's current EBT card around the 15<sup>th</sup> of each month. The March and April issuance will be issued together on April 15<sup>th</sup>.

For non-SNAP households, the Secretary of Agriculture, with the approval of this Plan, hereby authorizes the release of certain information by the Rhode Island Department of Education to the appropriate RI DHS official (Saurabh Gosai, Associate Director IT Systems) utilizing the authority granted under Section 1101(e) of the Families First Coronavirus Response Act, P.L.116-127. Mr. Gosai will receive a file from the Rhode Island Department of Education (RIDE) containing the names, birthdates, gender, race, ethnicity and addresses of all children residing in Rhode Island that are receiving free or reduced lunch. This file will be matched against current cases in RI DHS's eligibility system, and the children in the RIDE file who are not receiving SNAP will be identified. The demographic information for this group will then be sent to the EBT processor utilizing the existing file format, and an EBT card will be printed by the EBT processor and mailed to the eligible households. This same card will be utilized for benefits received for the months of March, April, May and June 2020. The estimated availability of March and April benefits will be 4/24/2020. Benefits for May through June will be issued on the 15<sup>th</sup> of each respective month. The information provided by the Rhode Island Department of Education to RI DHS pursuant to this authority shall be destroyed when no longer necessary for purposes of this section

**Calculation of Household Allotments:**

- Average date for the end of the school closures: 6/17/2020
- Average number of cancelled school days for which benefits are issued from the date schools were closed on March 16, 2020 until the average date for the end of school closures, June 17, 2020: 51
- P-EBT benefits will be provided on a monthly basis through the end of the

Rhode Island's calculated average date for the end of the regularly scheduled school year, which is 6/17/2020.

- The benefits issued shall be equivalent to the daily reimbursement for free breakfast and lunch in Rhode Island, which is \$6.64 per child per day, multiplied by the average number of days school was cancelled in the month for each eligible child in the household.
- The first month of issuance will be March 2020 with the benefit issued in April 2020. The total estimated issuance amount for the first month (March) will be \$4,053,879.36. Households will receive a combined allotment for March and April for the first month issuance which will be \$9,796,875.12 (estimated).

#### **Issuing P-EBT Benefits to Households:**

Rhode Island is prepared to issue P-EBT benefits in a phased approach in order to begin providing benefits to households as quickly as possible:

1. Benefits for children currently receiving SNAP: The State will use existing case information to issue the benefit as a supplement via the current benefit issuance process onto their existing EBT card. RI is preparing to issue March and April benefits on 4/15/2020. This will include benefits for the 12 days that schools were closed in March (a total of \$79.68 per student) and the 17 days schools will be closed in April (excluding April vacation week, totaling \$112.88 per student). In the months of May and June, benefits will be issued according to the amount of days children are out of school, depending on the continuation of the emergency declaration of the Governor and whether schools continue to be closed beyond April.
2. Benefits for children who are not currently active on SNAP: For non-SNAP households, utilizing the authority from the Secretary of Agriculture granted under Section 1101(e) of the Families First Coronavirus Response Act, the Associate Director IT Systems at the RI Department of Human Service, Saurabh Gosai, will receive a one-time file (to be destroyed when no longer needed for purposes of this section) from the Rhode Island Department of Education (RIDE) containing the names, birthdates, gender, race, ethnicity and

addresses of all children residing in Rhode Island that are entitled to free or reduced lunch. This file will be matched against current cases in RI DHS's eligibility system, and the children in the RIDE file who are not receiving SNAP will be identified. Therefore, the State can provide the P-EBT benefit without requiring an application from the household. The demographic information for this group will then be sent to the EBT processor utilizing the existing file format with a designated code to identify this population separately from the active SNAP population. The EBT card will be printed by the EBT processor and mailed to the eligible households. Benefits will be added to this same EBT card each month (for March, April, May and June). RI is preparing to issue March and April benefits together on 4/15/2020. This will include benefits for the 12 days that schools were closed in March (a total of \$79.68 per student) and the 17 days schools will be closed in April (excluding April vacation week, totaling \$112.88 per student). In the months of May and June, benefits will be issued according to the amount of days children are out of school, depending on the continuation of the emergency declaration of the Governor of Rhode Island and whether schools continue to be closed beyond April.

**Other Requirements:**

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

Expungements for both SNAP and non-SNAP households will occur according to the normal expungement rules.

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

1. The household calls the phone number on the back of the EBT card requesting a replacement
2. The EBT processor cancels the card
3. RI DHS and the eligibility system vendor is alerted about the replacement request and manually reprints the file for the EBT processor
4. The file is sent back to the processor and the processor will print and mail a

new card.

The State will conduct a public information campaign to alert those receiving benefits the purpose of P-EBT and how it is to be used. For non-SNAP households, the EBT card will also include a mailer with information about P-EBT.

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

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

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

## 5. Justification for Request: Coronavirus COVID-19

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

- Number of households receiving P-EBT benefits: approximately 30,000
- Number of children receiving P-EBT benefits: 50,877
- Amount of P-EBT benefits to be issued: \$ 337,823.28

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

- Number of households receiving P-EBT benefits: 10,343 (approximate)
- Number of children receiving P-EBT benefits: 17,531
- Amount of P-EBT benefits to be issued: \$ 116,405.84

**6. Anticipated Implementation Date: SNAP households: 4/15/2020**

**Non-SNAP households: 4/24/2020**

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



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Signature

Bethany Caputo, RI DHS SNAP Administrator

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Print Name and Title



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Signature

William Trimble, Associate Director of Finance, RI Department of Education

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Print Name and Title

**8. Date of Request: 4/1/2020**