

Georgia Pandemic EBT (P-EBT) Plan

The contents of this document do not have the force and effect of law and are not meant to bind the public in anyway. 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: Georgia

4. Proposed Alternative Procedures:

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

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

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

Verification of P-EBT Eligibility:

The Georgia SNAP agency and the Department of Education (DOE) share files to identify children who are eligible for free or reduced school lunch across the state of Georgia.

DOE will send a file of SNAP and NON-SNAP children who are enrolled in free or reduced school meals.

The SNAP agency will use the file from the Department of Education (DOE) that contains a list of children who are eligible for free or reduced school meals across the state of Georgia for the 2019-2020 school year. The school year is from August 2019 through May 2020. This file will include all children who attend Community Eligibility Provision (CEP) schools, public charter schools, and private schools participating in the free or reduced school meals program as of March 1, 2020. Since eligibility will be determined only for children receiving free or reduced meals as of March 1, 2020, newly-eligible (SNAP or non-SNAP) children will not be issued P-EBT at this time. GA reserves the right to amend this P-EBT plan to determine eligibility for newly-eligible children.

The “**DOE Free or Reduced Lunch File**” will contain the following fields:

- Residential County
- Gender
- Student Last Name
- Student First Name
- Student Middle Name (if available)
- Street Address
- City
- State
- Zip Code
- Phone Number
- GT ID (Georgia Testing Identifier) for each student
- School District Number
- District ID
- District Name
- School Identification Number
- School Name
- Primary Language
- Race (if available)
- Ethnicity (if available)
- Date of Birth (DOB)
- Actual Social Security Number (if available)
- CEP flag

Calculation of Household Allotments:

- Georgia will use the date range of school closures based on Governor Kemp's Executive Order. School closures began on March 16th, and the school year ends on May 22nd.
- Georgia plans to issue P-EBT benefits based on the number of days schools were closed (excluding weekends and holidays) in a given month, multiplied by the daily reimbursement rate for a free breakfast and free lunch.
- The first benefit month will be for March 2020 and April 2020 (anticipated funds availability in early July 2020).
- The second benefit month will be for May 2020 (anticipated funds availability in mid/late July 2020).

Issuing P-EBT Benefits to SNAP Households:

Georgia will receive the Free or Reduced monthly recipient file from the Department of Education and will match the file to current SNAP recipients in the Georgia Gateway system.

The State will use the process below to identify children in the Department of Education (DOE) file who match to an existing SNAP case for a P-EBT benefit month:

- The associated Georgia Gateway case numbers for each child or children in the case will be identified.
- The Issuance file for P-EBT will be generated based on the head of household Client ID. The file will contain the calculated P-EBT payment amount, which is based on the number of children in the household that had a match from the DOE file times the free or reduced school lunch daily cost rate. The Issuance Code will be 'L' to identify as P-EBT benefits.
- The Issuance file will be sent by Georgia Gateway to the State's EBT system.
- The file will be submitted through the batch process from Georgia EBT system to the EBT vendor (Conduent) with the total benefit amount authorized for the household's EBT account.
- The EBT vendor will issue the P-EBT funds on the EBT card.
- SNAP households will be notified that the P-EBT funds have been added to the EBT card.
- The estimated number of SNAP children expected to match on the DOE file is **600,000**.

Issuing P-EBT Benefits to non-SNAP Households:

Georgia will use the process below to identify children in the Department of Education (DOE) file who are Non-SNAP recipients or who do not match to an existing SNAP case for a P-EBT benefit month.

The SNAP agency will also use the **“DOE Free or Reduced Lunch File”** to confirm non-SNAP recipients are participating in the free or reduced school lunch program and are eligible for P-EBT.

- Households will apply for P-EBT using new webpages on the Georgia Gateway Customer Portal (CP). The webpages will be used to screen the household for P-EBT eligibility.
- The State will verify P-EBT by matching the household against Georgia Gateway to determine if the household receives SNAP. If receiving SNAP, the notification message to display on the CP screen is: **“Your household is receiving SNAP. The children in your household will receive P-EBT benefits through your EBT card.”**
- If the household is Non-SNAP, the household may apply for P-EBT through the Customer Portal. The state will verify P-EBT by matching the children’s demographic information against the DOE match file.

NOTE: If the child/children **are NOT found** in the DOE match file, the household may NOT submit the request for P-EBT. The notification message to display on the CP screen is: **“The Department of Education (GA DOE) has not confirmed that your children are in the free or reduced school meals program. We cannot process your P-EBT application at this time.”**

NOTE: If the child/children **are found** in the DOE match file, the household may submit the request for P-EBT. The following data will be stored in a Georgia Gateway table for non-SNAP P-EBT applicants: GT ID, HOH name, address, phone#, school aged children names in the household, children age, school name, district, SNAP Identifier = ‘N’

- An Issuance and Demographic batch file for P-EBT payments will be generated based on the application data received from the Customer Portal. A head of household unique Client ID will be assigned. This Client ID will have 2 integers to identify P-EBT cases. The file will contain the calculated P-EBT payment amount, which is based on the number of children in the household that had a match from the DOE file times the free or reduced school lunch daily cost rate. The Issuance Code will be ‘L’ to identify as P-EBT benefits.
- The Issuance and Demographic file will be sent by Georgia Gateway to the State’s EBT system.
- The State’s EBT system will send EBT information to the EBT vendor (Conduent) through an interface file batch process.
- The EBT vendor (Conduent) will create an account, mail the EBT

card and issue P-EBT benefits on a newly issued P-EBT card. The card that will be mailed to HOH will be a generic EBT card.

- The estimated number of non-SNAP children we do not expect to match on the current DOE file is 430,653.
- Georgia agrees to complete the FNS-292 form and other normally recurring SNAP reporting included the monthly FNS-46 and 388 reports. Georgia will await guidance from USDA in order to operationalize the reporting requirements for P-EBT.
- Georgia plans to follow the same expungement pattern of benefits for P- EBT as regular SNAP benefits, which is 365 days from the last client- initiated transaction. (refunds or purchases)
- P-EBT benefits will be staggered in order to mitigate any potential overwhelming of the state's food supply chains and distribution industries.

All P-EBT benefits will be delivered on an EBT card, and the State is currently working with the EBT vendor (Conduent) to ensure that it has sufficient card stock for non P-EBT clients to successfully begin operations for the number of households estimated below.

The State is working with the EBT vendor (Conduent) to amend the contract to account for new P-EBT card stock and increase pricing of cost per case per month (CPCM).

The State will conduct public information campaigns (websites and social media) to alert those receiving benefits for the purpose of P-EBT and how it is to be used. Customers will also receive notification about P-EBT via robocalls.

The State will also inform non-SNAP recipients that the time period for applying for P-EBT via the Gateway customer portal will be for 60 days beginning from the first day of go-live of the online application.

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

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

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

5. Justification for Request: Coronavirus COVID-19

6. Affected Caseload (Monthly Estimates for Existing SNAP recipients)

- Number of SNAP households receiving P-EBT Benefits: 300,000
- Number of SNAP children receiving P-EBT Benefits: 600,000
- Amount of P-EBT benefits issued to SNAP children: \$153,900,000

March 2020: (12) Total \$41,040,000 (12 days*\$5.70 per day * 600,000children)

April 2020: (17) Total \$58,140,000 (17 days*\$5.70 per day * 600,000

children) May 2020: (16) Total \$54,720,000 (16 days*\$5.70 per day * 600,000 children)

Total P-EBT Benefits Issued to existing SNAP children: \$153,900,000

7. Affected Caseload (Monthly Estimates for Non-SNAP recipients)

- a. Number of non-SNAP households receiving P-EBT Benefits: 215,327
- b. Number of non-SNAP children receiving P-EBT Benefits: 430,653
- c. Amount of P-EBT benefits to be issued to non-SNAP children:
\$110,462,494.50

March 2020: (12) days – Total \$29,456,665.20 (12 days*\$5.70 per day*430,653 children)

April 2020: (17) days – Total \$41,730,275.70 (17 days*\$5.70 per day*430,653 children)

May 2020: (16) days - Total \$39,275,553.60 (16 days * \$5.70 per day*430,653 children)

Total P-EBT Benefits Issued to non-SNAP children: \$ 110,462,494.50

TOTAL P-EBT Benefits Issued to All P-EBT children (SNAP and Non-SNAP):

- March 2020: \$70,496,665.20
- April 2020: \$99,870,275.70
- May 2020: \$93,995,553.60

Total P-EBT Benefits Issued: \$ 264,362,494.50

8. Anticipated Implementation Date: Early July 2020 for existing SNAP children and early July 2020 and ongoing for non-SNAP children as they apply for P-EBT.

Timeline Milestones:

- Milestone 1: Generate and send file to DOE for existing SNAP households (1-2 weeks)
- Milestone 2: Receive data files from DOE for all Free or Reduced Lunch eligible students in GA (0-1 weeks)
- Milestone 3: Process matches with existing SNAP households (2-3 weeks)
- Milestone: Time to build the application in Gateway for Non-SNAP families to apply (2-3 weeks)
- Milestone 4 : Process matches with Non-SNAP households (2 – 3 weeks)
- Milestone 5: EBT processing of files received from Gateway (0-1 week)
- Milestone 6: Implement communications plan including all stakeholders (local offices, notices to non-SNAP clients, etc.). This milestone can largely run concurrently with Milestones 2 and 3. (1-2 weeks)
- Milestone 7: Generate and send file to Conduent to create accounts, issue cards, and issue benefits for non-SNAP households. (0-1 weeks)

- Milestone 8: (and beyond): Repeat the process of generating files for Conduent to facilitate benefit issuance for May (+ other months that become part of the scope of PEBT due to ongoing school closures). (0-1 weeks).
- We are estimating a total turnaround time from Date of Approval to first benefit issuance of 21 to 28 calendar days.

9 Signature and Title of Requesting SNAP and Child Nutrition State Agency

Officials:



Signature

Tom C. Rawlings, Division Director, Division of Family and Children Services

Print Name and Title



Signature

Dr. Linette Dodson, State Director, Department of Education - School Nutrition Division

Print Name and Title

10. Date of Request: May 11, 2020