EES Policy No. 20-05-04 (Final Phase)	**RE:** Pandemic-EBT (P-EBT)
Policy Memo	**Contact Persons:** Janelle Harper
From: Sandra Kimmons	
Date: July 29, 2020 (Revised 8-10-20)	
Primary DCF Areas Affected: Food Assistance	**Where Posted on Web:** http://content.dcf.ks.gov/EES/KEESM/ Policy_Memo/policy_memo_list.html

The Families First Coronavirus Response Act of 2020 authorized the USDA to approve states plans to issue Pandemic EBT or 'P-EBT' benefits. P-EBT provides additional food benefits to families that include children eligible for free or reduced-price school meals. In Kansas, the Department for Children and Families in partnership with the Kansas State Department of Education (KSDE) developed a plan to offer the P-EBT benefits and the plan was approved by USDA on April 25th.

P-EBT is a state option to provide food benefits in the event of school closures lasting 5 days or more to all children age 5-18 who would have otherwise received a free or reduced-price meal at school. Governor Laura Kelly closed all schools in Kansas for the remainder of the school year on March 18, 2020.

Families will receive up to $291 in total P-EBT benefits per child, based on months the child was eligible for free or reduced-price meals. A full benefit would be for 51 days out of school at $5.70/day. The benefits will be provided in a one-time lump sum payment for closed school days in March, April and May 2020. The benefit is prorated based on the month of eligibility. For example, if a child's eligibility for free or reduced-price meals or other DCF benefits started in May they would not receive March or April P-EBT.

- March - $57 (10 days out of school)
- April - $120 (21 days out of school)
- May - $114 (20 days out of school)

DCF partnered with KSDE to obtain a list of free or reduced school meals recipients from the 2019-2020 school year, also known as the Benefits Issuance list. All schools in Kansas that participate in the National School Lunch Program will upload their most recent Benefits Issuance list to a DCF secure district portal. The Benefits Issuance list received from the schools also includes children that are not direct certified. This information will be used to help determine eligibility in KEES. The P-EBT benefits will be added to the household's

existing EBT card. DCF will provide households with an EBT card if they do not already have an active EBT account. P-EBT benefits will be issued in a phased approach as listed below.

P-EBT Benefits Chart:

# of Children	P-EBT Benefit Amount
1	$291
2	$582
3	$873
4	$1163
5	$1454
6	$1745
7	$2035
8	$2326
9	$2617
10	$2908
11	$3198

Auto Enrollment Criteria for Phase 1 and Phase 2:

- Child must be between age 5 and 18 as of August 31, 2019
- Child's discontinuance status reason cannot be:
    - State Residence OR
    - Whereabouts Unknown OR
    - Out of the Home
- Child must have a Household Status record of "In the Home"
    - Cannot have the status of "Added in Error"
    - Cannot be "Permanently Out of the Home"
- Child must not have a deceased date
- Child must not have a living arrangement that is high dated with the type of "Incarcerated"

Note: If the primary applicant of the case is deceased or has a high dated Living Arrangement record with the type of Incarcerated, a P-EBT block will not be automatically created.

P-EBT program considerations:

- The P-EBT program block is added to the case with an application date of May 1, 2020.
- The P-EBT program block will continue to show Active, staff do not need to take action. A batch will discontinue this program at a future date. **Staff should not manually discontinue this program by running EDBC.**
- A child can only receive this benefit on one case, not once on mom's case and once on dad's case or half of the amount on mom's case and half of the amount on dad's case.

Staff will begin seeing P-EBT programs in KEES starting May 18, 2020. At a high level here are the system changes:

- P-EBT will be a program
- P-EBT will be its own program block
  - Only the children will be included in the program block
- Other Program Assistance Detail Page
- EDBC
- Issuance History

P-EBT does not require an application through DCF. If schools have questions on how to provide student information, they will contact KSDE. For households who have questions about P-EBT benefits will contact DCF. Change of address caused by P-EBT will be addressed at next IR or Review.

Undelivered EBT card process for KEES cases with active P-EBT program only

For eligibility cases with P-EBT program activity only, a revised process is needed for undelivered EBT card tasks.   When an Undelivered EBT card task is reviewed:

- Review the case in KEES to determine if Food Assistance, TANF, or Child Care or P-EBT are open. Reminder: Check to see if a new address has been reported and not yet data accepted.
- If Food Assistance, TANF, Child Care, or P-EBT is **not** open, disregard and delete the task.
- Follow normal processes to update the address in KEES if the case head contacts the agency at a later date.

For ongoing cases with food assistance, TANF, or Child Care, follow the standard Undelivered EBT card process outlined of the **Undelivered Card Process Deskaid.** http://dcfnet.dcf.ks.gov/EES/Documents/EBT/Undelivered%20Card%20Process.pdf

Implementation Phases:

Phase 1:

- Child is currently receiving FA or TANF benefits as a Member with an application date before or equal to March 31, 2020 and is still active.
- Child was receiving FA or TANF benefits as a Member anytime between the dates of August 1, 2019 and March 31, 2020
- A notice will not be sent to these households.
- These benefits will be issued on a staggered issuance schedule as seen below:

If the clients last name starts with:	The consumer will get their benefits after 6:00am on the:
A or B	5/21/2020
C or D	5/22/2020
E, F, or G	5/23/2020
H, I or J	5/24/2020
K or L	5/25/2020
M	5/26/2020
N, O, P, Q or R	5/27/2020
S	5/28/2020
T, U or V	5/29/2020
W, X, Y or Z	5/30/2020

Phase 2:

- Households will be auto enrolled using the information provided from the school districts compared to children known to KEES. Below is the details used to determine a match.
  - Child First Name, Last Name and Date of Birth matches between the files that DCF received from the Kansas School Districts for those children that received Free and Reduced School Lunches and compare them to clients in KEES.
    - If a match is found, an Other Program Assistance (OPA) record for the 'National School Lunch Program' is created and if a case meets the criteria, a P-EBT program block created and benefits issued.
    - If a match is found, an Other Program Assistance (OPA) record for the 'National School Lunch Program' is created, but if case does not meet the criteria, a P-EBT program block will not be created and the parent will need to register through the parent portal.

- If no match is found, the parent will register through the parent portal and eligibility will be determined for P-EBT through that means.
- The P-EBT benefits will be issued on their existing EBT card or a new EBT card will be mailed to the households.
- A notice will be sent.
- These benefits began issuing May 28th and will continue through June 5th.

Phase 3

All other households who receive free or reduced-price meals and DCF cannot complete a data match will receive P-EBT benefits if the head of household registers to receive the P-EBT benefit. Schools will notify households that are receiving free and reduced-price meals how to register for P-EBT benefits using a confidential link. The link will be available 6/5/2020-6/30/2020 for families to register. Families should only use this confidential link if they did not receive a P-EBT benefit prior to 6/5/2020 because DCF was unable to automatically approve a benefit for the household based on data submitted by their school district. Kansas schools provided lists of students who are not direct certified but were eligible for free or reduced meals by an income application through the school. Some of the lists from the schools did not provide enough data for each child to complete a data match which is why households need to access the parent portal to provide additional information.

NOTE: Phase 3 – Definition of School Age – If a child turned 5 anytime during the school year (August 2019-May 2020), or if a child was 18 anytime during the school year (August 2019-May 2020) the child is eligible for P-EBT.

P-EBT Process:

Here are the high level steps necessary to process a request to register for P-EBT from the parent portal:

1. Household registers through the Parent Portal.
2. *Register P-EBT* Task is created in KEES in the Administrative Queue.
3. Staff claim the task and use the task to navigate to the e-Application Summary page. P-EBT Requests submitted through the Parent Portal do not generate a PDF or any images in ImageNow.
4. Staff register the P-EBT request using the e-Application Summary page. For more information on how to register a P-EBT request, click here.
5. Update the address on the Contact Summary page if needed.
6. Staff complete the task with a Status Reason of DCF-Complete. Do not add P-EBT Requests to the tracker.

    NOTE: This completes the registration process. When the request is linked to the case a *Pending* Other Program Assistance (OPA) record is created with the information provided from the household.

7. A nightly process in KEES will begin June 10th. The process will sweep for *Pending* P-EBT program blocks to determine if a registered child matches against the Free or Reduced School Lunch database.
   NOTE: The Free or Reduced School Lunch (FRSL) database is made up of files submitted from School Districts and contain information on children who received free or reduced school meals during the 2019-2020 school year.

8. If a match is found, KEES will update the Other Program Assistance (OPA) record verification value from *Pending* to *Verified*, run EDBC and send a notice. If the household is determined eligible, benefits will be added to an active EBT card or one will be mailed to them. If the household is determined ineligible then a denial notice will be sent.
   a. Possible Denial Reasons:
      i. Out of State Residence
      ii. Does not meet program eligibility
         1. Age Requirements
         2. Pending, Refused, or Not Applicable OPA record (not processed by Batch EDBC)
      iii. Duplicate Benefits
      iv. Deceased
      v. Incarcerated

9. If a match is not found, KEES will update the Other Program Assistance (OPA) record verification value from *Pending* to *Refused*. A report will be ran daily to identify these children and they will be added to the tracker.

10. When staff claim the P-EBT request from the tracker they will need to follow these steps to make an eligibility determination. This includes:
    a. Staff need to verify the child received free or reduced school meals during the 2019-2020 school year. Standard verification policy applies. Verifications should be imaged into Image Now under the *Work/School Schedule or Other Info* document type with a note of P-EBT.

       See below for acceptable sources of verification (these are in order of preference):
       i. Look in KEES to see if the child received Food Assistance, TANF or Foster Care anytime between July 2019 – May 2020. No other verification is needed. Update the OPA record verification value to *Verified*.
       ii. If one child has a verified OPA record you can update the other OPA record verify and run EDBC.
       iii. Search the list from the school district of children who received Free and/or Reduced School Lunch for a match (Excel list is located on BPM website under P-EBT)
          1. Use prudent person to confirm the request received for the child matches the child from the school district file.

Remember to take into account misspellings of a child's first name or last name, as well as nicknames names. For example, Chris vs. Christopher, Maddie vs. Madeline, etc.

      iv. Verification from the school that the child received Free and/or Reduced School meals during the July 2019-May 2020 school year
1. Letter of approval
2. Email from the school with the confidential link to the parent portal
3. Other source(s) proving the child received free and/or reduced school meals

      v. If any of these verifications are unable to be obtained then consult with a supervisor

b. Update the OPA record verification value as appropriate. This step includes completing data acceptance on the record that maps into KEES from the Parent Portal request. There could be a duplicate OPA record for a child if one was created by KEES when attempting to auto issue P-EBT during Phase 1 or Phase 2. Reject any new Other Program Assistance records if one already exists for each child.

      i. Update the record from *Refused* to *Verified* if verified

      ii. Update the record from *Refused* to *Not Applicable* if unable to verify (KEES will deny P-EBT for any child with an OPA record verification value of *Not Applicable*).

c. Run EDBC for P-EBT for the <u>application month only</u>

d. Send the generated NOA

Phase 3 Scenarios:

1. **KEES matches the Child(ren) from a P-EBT Request with the FRSL Database**
Miranda received an email from her children's school district. This email contained the confidential link to access the parent portal. Miranda logs into the parent portal and requests P-EBT benefits for each child. A *Register P-EBT* task is created in KEES and the request is registered. KEES runs the registered request through the nightly match process. The verification value on the OPA record is updated from *Pending* to *Verified* by KEES. This means a match was able to be made for the child(ren) on this case.
Action to be taken:
No additional action needed from Staff.

2. **KEES Could Not Match the Child(ren) from a P-EBT Request with the FRSL Database**
Courtney received an email from her children's school district. This email contained the confidential link to access the parent portal. Courtney logs into the parent portal and requests P-EBT benefits for each child. A *Register P-EBT* task is created in KEES and

the request is registered. KEES runs the registered request through the nightly match process. The verification value on the OPA record is updated from *Pending* to *Refused* by KEES. This means a match was unable to be made for the child(ren) on this case. An effort to get these cases added to the tracker will be done nightly.

Action to be taken:

Staff will claim the work from the tracker and should follow the verification process in order to determine if the child(ren) are eligible for P-EBT. If verification has to be requested and is received the document(s) should be imaged into ImageNow to the *Work/School Schedule or Other Info* document type. See step 10 of the P-EBT process for a list of acceptable verifications.

3. **Add child(ren) to an existing P-EBT program block**

   John received P-EBT benefits for his nephew that is living with him. He also receives caregiver TANF for his nephew. He has not received P-EBT benefits for his biological children that receive free or reduced priced meals that also live with him. John logs into the Parent Portal and submits a P-EBT request for his biological children. KEES creates *Register P-EBT* task for the Administrative queue.

   Action to be taken:

   The task is claimed and staff complete the following steps to register the additional child(ren).

   1. Add the child(ren) to the program block with the same application date and beginning date of aid used for the child(ren) on the program block. (Typically, this date will 05/01/2020). It is important to ensure the child(ren) are added using the existing application date and beginning date of aid. This will mean that the child will appear as *Pending* after EDBC is ran to approve the child for the one time benefit. This okay, a KEES batch will *Discontinue* these programs later and the *Pending* person will not impact that outcome.
   2. Link the request to the Case Number. KEES creates a Pending OPA record for the added child(ren).
   3. Complete the task.

   KEES will attempt to match the added child(ren) against the Free or Reduced School Lunch database and update the verification value on the OPA record to *Verified* if a match is found or *Refused* if a match is not found.

   Even though KEES may be able to find a match, KEES is unable to approve or deny P-EBT for added children through the Batch EDBC process. Added children to existing P-EBT program blocks are identified by a report and added to the tracker for processing.

   When Staff claim the client from the tracker they:

   1. Accept or reject the OPA record for the added child. If a duplicate OPA record exists for the child then that data mapping should be rejected.

2. If the OPA record has a *Verified* verification value, run EDBC, generate a NOA using copy and paste text and send the approval NOA.
3. If the OPA record has a *Refused* verification value then follow the verification process before updating the record, running EDBC, generate a NOA using copy and paste text and send the denial NOA.

Workers may note in the comments of the notice what child/children were approved or denied.

For example, Worker will research KEES to see if the biological children were active on a FA, TANF, or Foster Care program block during the July 2019-May 2020 school year. If required information is found and the household is eligible for P-EBT, update the OPA record and authorize P-EBT benefits. If not, additional information is needed from the household. The email to the client is DCF's way of verifying the household's eligibility for P-EBT. If they received an email from their school, they are eligible for P-EBT.

4. **Duplicate P-EBT Request**
Michelle has an *Active* P-EBT program block for her child, Mason. Michelle does not realize she has been approved for P-EBT so she completes the P-EBT request process through the P-EBT portal. She lists herself has the head of household and completes the request for Mason. When staff claim and work the Register P-EBT Task, they realize all applicants on the request have already been approved for P-EBT.
Action to Be Taken:
A duplicate P-EBT request is defined as a received P-EBT request where all the children on the request are the same as what is listed on an already registered P-EBT request in KEES. Link the duplicate request to the applicable case number and update the e-Application Status to *Posted*. No notice needs to be sent.

5. **Non-Foster Care Household contacts the agency and states they didn't receive an email from their school district**
Stacy did not receive P-EBT benefits or get an email from her school with the confidential link to register for P-EBT. She states she received free meals for her children during the 2019-2020 school year.

Action to be taken: Research KEES to see if the child(ren) received Food Assistance, TANF, or Foster Care any time between July 2019-May2020. If they did, they are eligible to receive P-EBT without any other verification. Since staff can see the household meets the P-EBT requirements, a P-EBT request from the Parent Portal is not needed.

If they did not, ask the client to contact their school and ask to have the email resent with the link. If school personnel are not available provide the client with the paper registration form that is located in the BPM documents on dcfnet. The client needs to complete, sign

and return to the form to DCF. Staff will register P-EBT and complete a cold scan of paper registration form when it is returned. Use the *Application* document type and enter a note to clarify the application is for P-EBT.

- Register a P-EBT Program Block using the date the request is made as the Date of Application and Beginning Date of Aid.
- If the child received TANF or Food Assistance as a MEM during the time period of 7/1/2019 – 3/31/2020, an OPA record is not necessary. If the child was not a MEM, but was Active, an OPA record will need to be added in order to approve benefits.
- If the child did not start receiving Food Assistance or TANF as a MEM until April or May, the child will receive a pro-rated share of P-EBT without the presence of an OPA record. If the child received FRSL prior to March, an OPA record should be added to ensure the full benefit amount is approved.
- Run EDBC for the application month.
- Send the generated approval NOA.

6. **Scenario: Foster Care Family contacts the agency and says they didn't receive a link from their school district**
Paula has foster care children in her home who are eligible to receive free meals at school. She has not received P-EBT benefits yet and did not receive the confidential link from the school.

Action to be taken: Paula will need to provide additional information through the DCF parent portal. If verified, DCF can provide foster parents with the link for them to go register. Information is required for head of household in order to issue a card for the foster children. Once information is received through the parent portal the case will be registered and processed appropriately. Worker will verify that the child has a foster care case and will email the foster parent the confidential link for them to register through the parent portal. The worker will get the link from their supervisor.

7. **Scenario: Child attends school in Kansas but lives across state lines and has an out of state address. Send to Food Assistance Program Manager before taking action on the P-EBT case.**
Raven has children that attend school in Elkhart, KS and they live across town which is right on the boarder of Oklahoma they have an Oklahoma address. She received the confidential link from her school and registered for P-EBT benefits.

P-EBT – Final Phase

P-EBT must be wrapped up by September 30, 2020 due to end of Federal Fiscal Year. All P-EBT benefits must be authorized by September 25, 2020. No new P-EBT requests (portal and paper application) will be accepted after July 31st. P-EBT requests received by July 31st should be processed per the P-EBT Policy Memo. If information is requested and received or not received within 10 days of the request process the case as normal. Cases may be rescinded if information is received by September 25, 2020 and the request for P-EBT was made between June 5, 2020 – July 31, 2020. Cases where information is not received by September 25, 2020 will be denied. If cleanup is needed those will be managed via report and sent to the BPM team.

Scenarios-

1. P-EBT request received June 10th and the agency was unable to verify that the child received free or reduced priced meals during the 2019-2020 school year. RFI is sent to the household due on June 20th. Information is not received within 10 days and P-EBT is denied. On July 10th the household provides a copy of the free lunch eligibility letter from the school. Rescind the case, update the OPA record from "refused" to "verified", run EDBC and send NOA.

2. P-EBT request received on or before July 31st and FRSL verification is needed.

   a. Request verification of FRSL.

      i. If verification is received by due date of the request, update the OPA record appropriately and process the case.

      ii. If information is not received by the due date, deny the case.

      iii. If verification is received after the due date but on or before September 25th, rescind the P-EBT case and take appropriate action.

   b. Batches will not deny cases when information is not received. The end of the season batch will auto close only cases that were Active. Cases still pending will fall out to a clean up report.

3. If a timely P-EBT registration is discovered after the P-EBT program block is closed, what should staff do?

   If on or before September 16th, P-EBT should be registered and processed appropriately, requesting information if needed. School staff may be back in the office to provide verifications. A collateral contact may be made to the school in this situation. If RFI is sent and information is not provided timely, deny the case. If verification is provided on or before September 30th, rescind the case, update the OPA record

appropriately, run EDBC, and send NOA.

> **NOTE**: If discovered on or before September 25th and verification is NOT needed authorize P-EBT benefits. If discovered after September 25th the case will be ineligible for P-EBT.

4. A case is discovered after July 31st and on or before September 16th that should have auto-issued P-EBT due to having DCF benefits sometime during the school year and the parent did not register timely. Should we register without a P-EBT request or did they miss out by not registering?

    a. If DCF did not auto issue P-EBT benefits to a household that was eligible for P-EBT per the Policy Memo, the case needs to be worked appropriately.

If the household did not receive any public assistance during the school year and did not register by July 31st they will not receive P-EBT.

5. P-EBT benefits were put on a medical case, there are 3 children on the case and only 2 children were issued P-EBT benefits. The other child should have received the benefit. How do staff handle these cases?

    a. KEES ran an automated batch job the weekend of 7/25 to issue P-EBT benefits on Medical cases that had children verified as eligible for P-EBT but did not have a useable Non-Medical case number. If staff find there is an eligible child in the home that was left off the determination, they should send a ticket to the KEES Help Desk.

        i. **DCF staff should not attempt to add the child or run EDBC.**

        ii. Include the following information in the Help Desk ticket:

            1. Short Description: Add P-EBT Child to Medical Case

            2. Description: Include the child(ren) name and client ID.

6. Client calls on August 10th and reports that they received P-EBT for one child and not the other. Worker sees that there is only one child on the P-EBT program block, no Eapp linked to the case, but there are 3 other eligible children associated with the case that have not received P-EBT. The worker can verify the children on the FRSL. How do staff handle this scenario?

    a. If one child has a verified OPA record you can create an OPA record for the child(ren), mark as "verified" and run EDBC.

    NOTE: This not considered a "request" for P-EBT. See Phase 3 P-EBT Policy Memo P-EBT Process #10.