

Pandemic EBT

Policy + Delivery Memo

CODE *for*
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Pandemic EBT Is an Essential Program for Children During the Ongoing COVID-19 Crisis

When schools quickly shuttered as the novel coronavirus first swept through the country, 30 million children were suddenly without daily access to the free and reduced-price meals they received at school through the National School Lunch and Breakfast Programs.

In response, the Congressional Families First Coronavirus Response Act authorized a brand new benefits program: Pandemic EBT, or P-EBT, allowing children who would normally receive free and reduced-price school meals to receive food assistance on an EBT card to supplement meals at home. Since the USDA released its [P-EBT state guidance memo](#) on March 20, all 50 states have delivered this brand new benefit to millions of families. They did this with minimal guidance and little financial resources to do so, all while weathering an unprecedented crisis, sweeping school closures, and massive surges in SNAP application volume. And, while the final outcomes of the program aren't known yet, preliminary data suggests that [P-EBT made a significant impact on child hunger](#), sparing children in the lowest-income households from severe food insecurity.

“My job that I worked part time is closed due to Coronavirus. My kids are home from school and I have no daycare for them. They are on the school lunch program and that is a financial issue to provide what they need at this time.”

— Parent of P-EBT eligible children

Currently, Pandemic EBT is set to expire this month and has not been federally reauthorized for the 2020-21 school year. However, with the future of in-person schooling remaining uncertain amidst a still-uncontrolled pandemic, Congress has promised to revisit the question of a P-EBT extension. **P-EBT is an essential resource for children during this ongoing crisis, and should be extended to help families provide for their kids when in-person schooling is still unsafe in many places.** We're in a critical moment with an opportunity to learn from the successes and challenges of implementing P-EBT so that a potential extension can more effectively help the millions of families who are still very much in crisis. Now is the moment to iterate upon the federal policy and guidance, and state implementation, as we head into another uncertain school year.

“P-EBT proved that government can respond effectively to unanticipated emergencies. Our experience also proves that we can do better—we learned a lot about what we need to make this work even better next time.” — P-EBT state partner

Opportunities for Improvement

While the concept of Pandemic EBT policy seemed relatively simple, and was based upon previous [Summer EBT demonstration projects](#), quick implementation of the new program nationwide proved very challenging in most states. P-EBT was an important proving ground for how we can prevent child hunger when it's unsafe for schools to be open, but there were key hurdles and bottlenecks that hampered a smooth rollout and prevented states from helping children sooner.

If a new wave of P-EBT is required to prevent further child hunger this school year, how can we plan for P-EBT to reach families more effectively? P-EBT should be extended for the benefit of kids and families who have been profoundly impacted by the COVID-19 crisis, but it is vital to iterate and improve on the policy to make the program easier to implement. **Congressional policy and FNS guidance should, in future iterations of P-EBT, address these 5 key issues so these vital benefits can reach families faster and in a more people-centered way.**

1. Identifying Eligible Children

Which children are eligible for P-EBT, and how can states identify them in a crisis?

During the first months of P-EBT, the USDA gave states **unclear and changing guidelines of categorical eligibility and implementation**. States had to monitor and share other states' plans to learn what the USDA might approve to confer eligibility for the program. Additionally, as school districts identified **newly eligible students in families who had lost jobs and income**, school closures required state SNAP agencies to create brand new systems to confer eligibility and deliver services at a time when more families are facing poverty and SNAP application volume is soaring. Very few states had a centralized data repository on children who were eligible for free and reduced price meals that could be used for this purpose, and most state SNAP agencies **did not have easy access to this data** needed to identify and reach P-EBT eligible children.

RECOMMENDATIONS

FNS should provide clear guidance on conferring eligibility for P-EBT, and should offer consistent instructions for how states can use existing data and social service program enrollment to determine eligibility for P-EBT. Additional verification to school records is often unnecessary. Clear guidance should include a recommendation for a two step process: First, deliver benefits to students who are “known” social services beneficiaries through the use of social services data. Next, use school system data to identify other students who aren't present in social services data, but who are free and reduced-price meals (FRP) eligible. One system does not fit all.

2. Data Sharing

How can state agencies gather and utilize local school district data?

Because many state education agencies did not have centralized data repositories, they had to rely on collecting data from school districts and transferring it to state SNAP agencies. While the dispersal of P-EBT benefits was owned by social services agencies, the FRP data that determines eligibility is housed by individual school districts. Transferring local school data to state SNAP agencies was unprecedented—sometimes even barred by state law—and overall presented a significant logistical challenge. **Each school district collects and manages different data in different ways**, which increased the complexity of transferring information to a centralized system and required countless manual hours of systematizing and cleaning data to make it usable. With schools facing multiple logistical crises due to closures, many states were unable to collect local data from districts, particularly in states with local-control governance structures.

RECOMMENDATIONS

The successful launch of P-EBT hinged on state agencies' ability to identify all eligible students within existing education datasets and data system infrastructure that did not conform to the needed elements for P-EBT. If each state had consistent and reliable K-12 student data collection and management practices, P-EBT benefits could be issued relatively smoothly and easily. However, many did not have these in place prior to the pandemic. Education departments must issue consistent guidance to school districts specifying what information should be collected from students, and what format the data should be collected in. Consistency across school district data sets in terms of data fields and format will cut down on standardization time if this data is needed by social services agencies once more.

3. Navigating Vendor Relationships

Does the state EBT and Integrated Eligibility System (IES) vendor have the capacity to implement P-EBT on a short timeline? Can all vendors provide the needed capabilities and collaborate with each other?

All states are **navigating complex contractual relationships** with a very small pool of vendors whose active participation was needed to launch P-EBT quickly in a crisis. Incumbent vendors often charged states significant costs for implementation of P-EBT, as it was out of scope from their base contracts. This often **required states to enact multiple arduous contract amendments and negotiations to make the work possible**. Existing workflows and contracts often didn't provide the flexibility to launch P-EBT quickly, and shortages caused states to utilize ineffective workarounds. Such was the case in many states in which EBT vendors stated that there was insufficient EBT cardstock available to launch P-EBT. The program saw significant delays when policy stipulated that EBT be used as the only vehicle for P-EBT payment, and the limited vendors were unable to quickly provide enough EBT cards to reach all eligible children. States were faced with the impossible choice between reaching children effectively, or reaching them quickly. With limited cardstock, states were forced to attempt to group individual students into families and households without reliable data to do so.

RECOMMENDATIONS

One of the most consistent challenges across states was the mandated reliance on the existing EBT system—and therefore existing EBT vendors and contracts—for the delivery of P-EBT benefits. States need more flexibility to use other means of delivering benefits to families who do not currently possess EBT cards. Alternative payment systems could reimburse families for the cost of lost school meals without locking states into a corner of renegotiating existing multimillion-dollar contracts with a vendor. FNS should allow states to use other delivery mechanisms that make sense in their state context, such as preloaded debit cards produced by another local financial institution. For example, in California, unemployment and disability benefits are delivered on a debit card produced by Bank of America, but a similar option to leverage alternative payment delivery was not available for P-EBT.

4. Data Accuracy

How can existing data be used to accurately issue P-EBT benefits?

Existing free and reduced-price meal data presented numerous challenges with identifying duplicate student records, grouping students into households by identifying siblings and head of household information, as well as identifying most up to date mailing addresses within existing data. It is widely recognized that [families with low incomes face residential instability](#)—**reaching families at a current mailing address during a crisis is a challenge that should be planned for and expected.** Many states struggled with databases full of out-of-date or inaccurate student information, making it difficult to deliver P-EBT benefits. Data accuracy issues drove a need to try to identify current student information or verify eligibility by matching records across datasets, and identifying appropriate data matching strategies to do this proved consistently challenging across states.

RECOMMENDATIONS

It is unrealistic to expect that datasets will have accurate, current mailing addresses in a crisis, especially when the pandemic compounded instability and uncertainty for so many families. Implementation plans should assume that this data point needs verifying or updating. States have an opportunity with the arrival of back-to-school season to put new data collection and management practices in place, and to give families impacted by the pandemic an opportunity to provide up-to-date mailing and contact information to their local school district.

5. Family Engagement

How do state agencies let likely eligible people know about P-EBT? Do they have the resources to provide the necessary client support?

Even after all of the above challenges were navigated, states still needed to develop strategies and resources for building public awareness about the P-EBT program and rollout, as well as build infrastructure to provide ongoing client support. Likely eligible families and communities needed information about what P-EBT was, how to get P-EBT benefits, and how P-EBT benefits could be used to purchase food, and many states had to create new ways of reaching families with this critical information. Additionally, P-EBT was complex for many clients to understand and navigate, and the program required customer service to support clients through activating their new P-EBT cards, changing their address information, reporting a lost or stolen card, or understanding whether or not their children were eligible. Social services agencies found that **client support needed to be provided until all benefits were spent down, which significantly stretched administrative capacity** to handle the massive call volume while maintaining SNAP operations. Many states rapidly stood up call centers outside of their existing infrastructure, or leaned on other avenues to communicate with clients—like texting or online inquiry forms—to relieve volume on existing call centers and hotlines.

RECOMMENDATIONS

Schools are a strong messenger for P-EBT information, and are a trusted source of information for families. Social services agencies should partner with schools to develop outreach scripts for multiple communication methods—email, phone calls, and text messages—to provide maximum outreach to families about what P-EBT is and how these benefits can be obtained. For states to conduct wide public awareness outreach on P-EBT, and to build a customer service infrastructure to support clients throughout the program required significant resources which often stretched administrative capacity. If P-EBT is renewed, FNS should consider providing additional administrative funding so that states are able to stand up the right level of client support and engagement.

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Questions?

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Additional P-EBT data, analysis, and stories of social services delivery during the COVID-19 crisis are available upon request.