

Documenting P-EBT Implementation Arizona Case Study

Overview

Implementing the Pandemic Electronic Benefits Transfer (P-EBT) program was important to Arizona leaders and state agencies quickly submitted a state plan for federal approval. The state's Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition agencies quickly established a working relationship and rose to the challenge to stand up a new program and reach as many eligible children as possible. A centralized student database allowed for quicker access to student information, but like other states, Arizona faced barriers with regard to accuracy of student data and found it difficult to broadly communicate about a new program in such a limited time. Challenges aside, in less than three months, Arizona started issuing more than \$200 million in P-EBT benefits to more than 636,000 children in the state and reached more than 98% of children approved for free or reduced-priced (F/RP) school meals before the end of September 2020.



"Schools across the state have worked hard to get nutritious meals to kids while schools are closed, and this program [P-EBT] will build on these efforts and provide additional relief to families struggling at this time."

– Arizona Governor Doug Ducey

State Context

The Arizona Department of Economic Security (DES) served as the lead agency for implementation of P-EBT, in collaboration with the Arizona Department of Education (ADE). Prior to implementing P-EBT, DES and ADE had a minimal working relationship to support the exchange of student data for direct certification purposes.¹ Staff in different positions at each agency were involved in implementing P-EBT, and once those connections were made, the agencies quickly developed a partnership and were equally committed to reaching as many eligible children as soon as possible during a time of high need.

¹ Direct certification is the process by which eligible children are certified for free meals without the need for a household application based on participation in one or more means-tested Federal assistance program(s). Arizona had a 79% direct certification rate in FNS's most recent study. See "Direct Certification in the National School Lunch Program: School Year 2015-2016 and 2016-2017." October 2018. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/NSLPDirectCertification2016.pdf>.

Implementation Overview

Plan Approval from Food and Nutrition Services (FNS)

On April 17, Arizona was one of the first states (tied for 5th) to gain FNS approval to implement P-EBT. With limited guidance from FNS, Arizona sought feedback from other early implementers, like Michigan, and made a series of decisions to “put the child’s needs first” based on the availability and accuracy of student information needed to issue P-EBT benefits. Arizona’s state plan was later amended to include newly eligible children.



“We are really proud of the amount of kids who got P-EBT cards and how quickly they got them. Especially the families who didn’t know they were eligible before this.”

– SNAP official

Plan Design

In Arizona’s original plan, the state anticipated serving 77,500 SNAP households and 170,834 non-SNAP households, reaching an estimated 596,000 children overall.² Arizona’s P-EBT plan amendment increased this estimate to 703,000 children, once newly eligible children were included, and accounting for families that may have become eligible but hadn’t had an opportunity to sign up due to schools being closed.³ This turned out to be an optimistic over-estimate and the final number of children eligible for P-EBT was 648,000. The maximum P-EBT benefit was calculated to be \$315 per child (\$5.70 per day multiplied by 55 days on which schools were closed). Arizona anticipated issuing over \$220 million in P-EBT benefits to Arizona’s children.

Issuance Method

Arizona sought to directly issue benefits to the majority of eligible children so that their families would not have to apply. ADE provided information to DES on public school students approved F/RP school meals through their centralized student database, and private schools provided lists of students approved for F/RP school meals directly to DES. This information included children attending Community Eligibility Provision (CEP) schools.

DES also used the lists of children approved for F/RP school meals to confirm eligibility of children participating in SNAP and the Temporary Assistance for Needy Families (TANF) programs to issue P-EBT benefits directly onto households’ existing EBT cards.

² FNS Approval of Arizona’s P-EBT Plan, April 17, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/AZ-SNAP-COV-PEBT%20Approval%20Letter.pdf>

³ FNS Approval of Arizona’s Amended P-EBT Plan, May 29, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/AZ-SNAP-COV-PEBT-Amendment%20Approval%20Letter.pdf>

For children not previously known to DES, benefits were issued by mailing P-EBT cards to the head of household to avoid sending multiple cards to the same family, or to the child if head of household information was not available.

Application for Newly Eligible Children and Children Missed by Direct Issuance

DES created an online portal called, "Request for Arizona P-EBT pandemic school meals replacement benefits." The portal was where families who became newly eligible for P-EBT benefits due to loss of income could apply, and where eligible families who were not reached through direct issuance due to missing or inaccurate information could provide or update their information. Advocates reported collaborating with the state agencies during the development of the portal and found it to be an accessible and easy-to-use information collection tool.

Timeline

Phase 1: Children enrolled in SNAP and TANF programs, who were confirmed as attending a school participating in the National School Lunch Program (NSLP) through matching to lists provided by ADE and private schools, received benefits through two issuances. March and April benefits were added on their household's existing EBT cards by May 5, and May benefits were added by May 18. This phase reached approximately 262,400 children or 41% of all children who received P-EBT.

Phase 2: Children approved for F/RP school meals as of March 2020 who did not receive SNAP or TANF were issued benefits on new EBT cards that were mailed beginning on May 12. This phase included approximately 369,000 children, representing 58% of all children who received P-EBT.

Phase 3: The final phase was for newly eligible children and eligible children not reached during the first two phases who could submit information through the online portal that went live in early June and closed September 25th.

Families could also submit their P-EBT application via phone. Newly eligible families could not apply after August 1, but other households could submit information through September 29. This phase included approximately 4,400 newly eligible children, representing .7% of all children who received P-EBT.

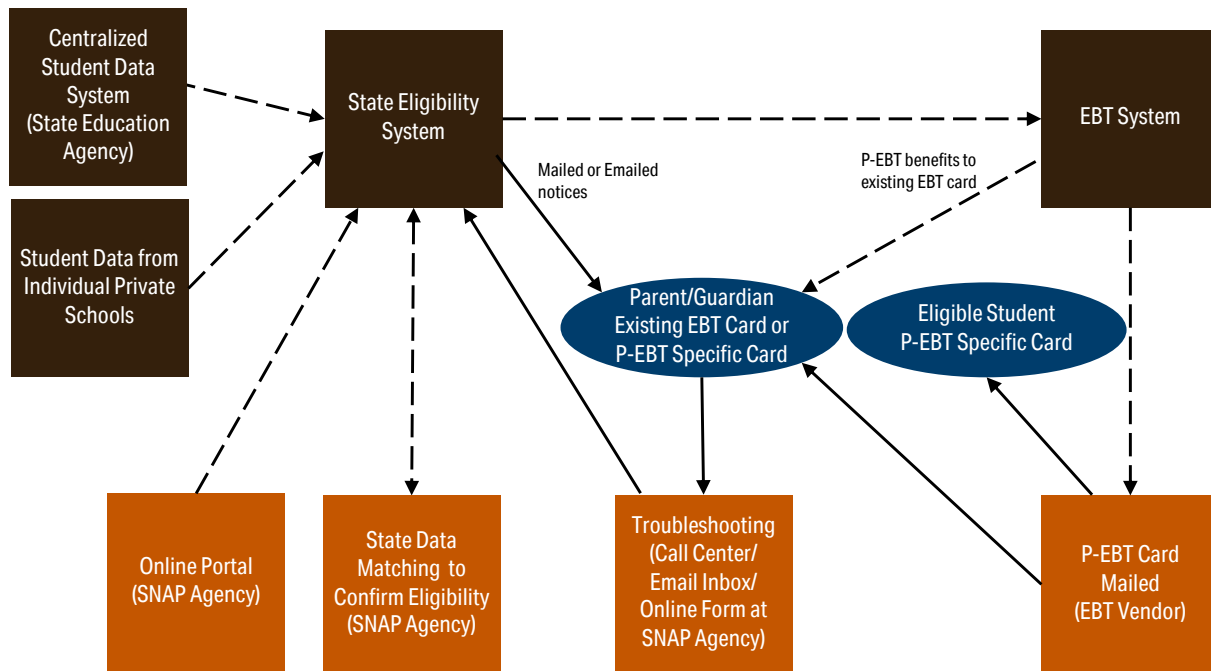


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Arizona. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represent the customer and the output. The lines represent the flow of information and whether it was electronic or manual- the dotted lines represent only electronic data. The map does not attempt to estimate workload or level of complexity to implement each of these steps.

Student Data

Arizona essentially had two P-EBT eligibility lists. One came through ADE's centralized database and included information on students attending public schools. The second was compiled by DES from private school submissions. Private schools were given a lot of flexibility with regard to how data was organized and as a result they took more time for DES staff to sort. Charter school participation in ADE's centralized database is optional and many charter schools don't include their data, which meant that DES needed to identify eligible children attending charter schools.

Data on children approved for F/RP school meals who did not receive other public benefits presented various challenges, of which mailing addresses and head of household information were the most difficult. Other data challenges included data errors, such as misspelled names, missing the first name, and two last names. ADE has been working on improving data matching with SNAP for direct certification over the past several years, so data accuracy has improved, but this is an ongoing process.

Systems and Contracts

DES's eligibility system is a legacy system from the 1980s. DES reported they were able to make it work to process benefits, coding P-EBT benefits as a new benefit sub-type under SNAP, but it constrained DES's ability to incorporate student information due to system interoperability limitations.

DES had concerns about their EBT vendor, FIS, running out of P-EBT cards. Ultimately they had enough cards but implementation was spread out because FIS issued only 30,000 EBT cards per day to avoid overwhelming grocery retailers.

Inter-agency Collaboration

The working relationship between ADE and DES prior to P-EBT was limited to direct certification, but once DES connected with ADE Child Nutrition staff, they quickly developed a collaborative

partnership. Advocates also reported a strong working relationship with state agencies and indicated that state staff were receptive to questions and ideas, strengthening the overall implementation approach.



“Every time we reached a new barrier, we pulled together to figure it out.”

– SNAP official

Troubleshooting

Arizona’s P-EBT program had multiple mechanisms for families to make inquiries. DES operated a statewide call center, ADE hosted an email inbox and an online inquiry form, and school districts had email inboxes. Common inquiries to the call center included questions about eligibility, tracking P-EBT card arrival, and situations in which benefits were received for one/some, but not all children.

ADE reported that most of the inquiries received by Child Nutrition staff were about data challenges – children who weren’t confirmed as eligible due to incorrectly entered information.

Outdated or inaccurate addresses were barriers to mailing P-EBT cards to families, especially in rural Western and Northern Arizona, where it is common to only be able to receive United States Postal Service (USPS) mail through a P.O. Box. If the residential address on file with DES was used instead of the P.O. Box, USPS would return the mail as undeliverable. According to advocates, the 25,000 cases that remained unresolved towards the end of implementation were mostly related to incorrect addresses. Though it required significant staff time to address these cases, they represent a small percentage of the overall number of children served.

P-EBT card activation was also as a common inquiry as some families struggled with the process of “pinning.” Card activation options in Arizona included 6-digit student date of birth, 6-digit head of household date of birth, and a case number.

Outreach and Communication

Arizona’s outreach and communication plan to reach families regarding this new program included press releases, information on their website, and social media. Families that were issued a P-EBT card were also mailed a notice explaining the benefits. Families receiving SNAP were sent an electronic communication to explain the additional benefits issued to their card. State agencies also partnered with advocacy

organizations to disseminate information to families through schools, flyers, and social media. DES primarily focused their outreach efforts on reaching eligible families that had been missed during direct issuance.

One example of coordinated outreach efforts in Arizona was to tribal communities. Advocates did targeted outreach to increase awareness about P-EBT and DES worked with tribal schools to make sure addresses were up to date. For students living on a reservation who are not able to get mail delivery, or have P.O. boxes that are difficult to deliver to, state officials worked with school nutrition staff to ensure P-EBT cards got to families through other means.

Advocacy organizations also used their networks and coalitions to encourage people to apply if they thought they were eligible but hadn't received a P-EBT card or were newly eligible.



“Our state agencies definitely wanted our help with spreading the word to families, reaching out to schools and food banks, [etc.]”

– Anti-hunger advocate

Outcomes to Date

Arizona did not have cumulative data available at the time of the interview due to being in the midst of implementation. Arizona had plans to track outcomes including the number of households and children issued benefits, the amount of benefits issued, the amount of benefits spent, and the number of cards returned or activated. As benefits are still being spent, Arizona plans to look at outcome data in January.

Advocates reported the P-EBT program in Arizona reached 98% of eligible children and that there were learning opportunities for future efforts to streamline eligibility.

Lessons Learned

State officials identified a number of things they would do differently if given the opportunity to implement P-EBT again in the future, which they believe would improve the process.

1. Given the importance of current and accurate student data, especially for direct issuance, there were several things the state agencies and advocates mentioned that would help improve student data:
 - use an application programming interface (API) to extend existing system functionality and increase interoperability so that automated data sharing could occur in place of manually sharing data files,
 - change the process so that student data is uploaded into ADE's database earlier and more frequently,
 - update student information (especially addresses) more frequently,

- continue quality control efforts to reduce data entry errors or address earlier in the process, and
 - continue improving the intuitiveness of data matching for direct certification to extend eligibility without another process.
2. Arizona would like to determine a mechanism to include Head Start programs that participate in the National School Lunch Program, whether on-campus or not, and believe this was a missed opportunity.
 3. A more robust and strategic communication plan about the program to explain P-EBT benefits and better educate existing SNAP households could reduce the volume of calls and inquiries. Increasing the collaboration with and information being shared from community and advocacy partners and seeking more outreach opportunities could lead to better take-up in areas where fewer households utilized P-EBT.



"P-EBT has been critical, helping keep food banks from being overwhelmed by giving people the ability to buy food, and helping schools with summer meals when so many kids weren't able to get to school during the summer for meals - especially if they had to walk several miles in the 115-degree heat to get there."

- Child Nutrition official

Appendix

More information on Arizona's P-EBT program is available at

<https://www.cbpp.org/sites/default/files/atoms/files/9-14-20fa-stateprofile-az.pdf>.

Additional materials including FNS letter of approval, FNS amendment approval, a screenshot of the SNAP Agency's website including P-EBT FAQs, and a P-EBT flyer from the Arizona Food Bank Network can be found in the resource library available at <https://www.cbpp.org/pandemic-ebt-resource-library>.