

Documenting P-EBT Implementation Kansas Case Study

Overview

The Pandemic Electronic Benefits Transfer (P-EBT) program in Kansas served 170,760 children by issuing over \$49.7 million in benefits to families over four months for the 2019-2020 school year. Kansas senior leadership fully supported implementing a P-EBT program and the state was quick to submit a state plan and receive federal approval. The state's Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition agencies worked hard to overcome challenges that slowed implementation, such as data matching to confirm eligibility and effectively communicating about the program across agencies and to families. When Kansas's P-EBT registration portal closed on July 31, the vast majority (93%) of eligible children had been reached.



"It was an all-hands-on-deck approach. We are proud of the sheer volume of benefits that have been issued."

– SNAP official

State Context

The Kansas Department of Children and Families (DCF) served as the lead agency for the implementation of P-EBT, in collaboration with Kansas State Department of Education (KSDE). KSDE worked with the 408 School Food Authorities (SFAs) (the entities that operate the school nutrition program for school districts) to obtain lists of children approved for free or reduced-price (F/RP) meals and DCF was responsible for issuing P-EBT benefits via Electronic Benefit Transfer (EBT) cards. DCF and KSDE had an existing working relationship due to establishing and maintaining a direct certification process that includes daily data matching.¹

Implementation Overview

Plan Approval from Food and Nutrition Services (FNS)

On April 25, Kansas was the 11th state to gain approval of their P-EBT implementation plan.² DCF submitted the plan and FNS provided some technical support on policy before approving, mostly around defining what constitutes a school age child. Kansas did not make any amendments to their plan, but they

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). Kansas had a 100% 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>.

² FNS Approval of Kansas State Plan, April 25, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/KS-SNAP-COV-PEBT-Approval.pdf>

did have to change the issuance date because of delays. KSDE was not involved in the initial development of the plan and believe earlier involvement could have helped with the plan design and avoided some of the challenges faced during implementation.

Plan Design

In Kansas's approved P-EBT plan, the state identified 169,795 children eligible for P-EBT. The maximum P-EBT benefit was calculated to be \$291 (\$5.70 per day multiplied by 51 days in March, April and May 2020 on which schools were closed).³ Kansas anticipated issuing more than \$49 million in P-EBT benefits to Kansas children if they reached all eligible children. P-EBT benefits were either added to the household's existing EBT card or a new EBT card was issued to households who did not already have an active EBT account. P-EBT benefits were issued in a phased approach as described below.

Kansas issued P-EBT benefits to the head of household rather than the individual child for the following reasons: (1) to ensure that an adult activated and used the card; (2) it would be easier for parent or guardian of multiple children to manage just one card; (3) it would be easier for the EBT vendor call center to respond to inquiries; (4) to reduce EBT costs; and (5) to allow use of existing branded card stock, so there was no need for cost/storage of generic cards.

Issuance Method

Kansas intended to directly issue (meaning families did not have to apply) P-EBT benefits to all eligible children who could be matched in DCF's Kansas Eligibility Enforcement System (KEES) because they received SNAP, Temporary Assistance for Needy Families (TANF), Medicaid, foster care, and child care assistance; about one-third of all estimated eligible children. Even though Kansas does not use Medicaid or child care data for direct certification for free school meals, the state was able to use household information in the Medicaid system to support the issuance of benefits.

Kansas also planned to directly issue P-EBT benefits to children approved for F/RP meals through lists of eligible students compiled by KSDE; the remaining two-thirds of estimated eligible children.



"There was a lot more unusable match than we expected. [For phase 2] we estimated we could auto enroll 100,000 kids but only got 6,000."

– SNAP official

³ The number of children identified as eligible in the initial plan proved to be an underestimate. The final number also includes children who became eligible after the plan was approved.

Registration Portal

DCF designed a “registration” process through an online portal where families who were not reached through direct issuance—due to missing data (such as a child’s date of birth) or variations in data entry (such as reversing first and last name, addresses being in separate spreadsheet cells, or special characters)—could provide that information. The plan was to email eligible families a confidential link to the registration portal with a code, so they could provide additional information. Families could call the DCF hotline to register if they did not have internet access to complete the registration online.

DCF had planned to leave the portal open for two weeks and then compare data uploaded by schools to what was submitted by households to confirm the child’s information and eligibility. Due to the high demand, the link for the registration portal went public on June 5. DCF found the registration portal to be a necessary part of implementation, especially after recognizing they had insufficient data for a substantial number of children.

Timeline

Phase 1: Children who were known to DCF through their eligibility system (KEES) and who matched with KSDE’s list of children approved for F/RP meals, received P-EBT benefits through direct issuance by the end of May. Matching information between DCF’s eligibility benefit system and KSDE’s list to confirm eligibility ended up being more difficult than anticipated. DCF estimated this phase would reach 87,612 children and in actuality reached 60,369 children, representing 35% of the overall number of children estimated to be eligible for P-EBT.

Phase 2: A small portion of children approved for F/RP meals were directly issued benefits by mid-June. This phase was estimated to reach over 100,000 children but ended up reaching just 6,200 (4%) of the estimated number of children due to data limitations. The remaining families who were not reached in this phase were referred to the registration portal in phase 3.

Phase 3: For children approved for F/RP meals with insufficient information for DCF to directly issue P-EBT benefits in Phase 1 or 2, families were referred to the registration portal. Due to significant data limitations the number of families referred to the registration portal was vastly greater than anticipated. This was meant to be a confidential link sent out either by DCF (for families on public assistance) or KSDE, but it went public on June 5. As of July, 36,198 requests had been submitted. DCF originally intended to close the portal on June 30, but Kansas had only reached about 50% of remaining eligible children as of July 6 so the registration deadline was extended to July 31.

Phase 4: An additional phase was added for one more push to reach remaining eligible children. During this phase manual benefit processing was required for certain households, including:

- Foster care children who may have moved. DCF worked directly with the Foster Care system to make sure P-EBT benefits were being issued to the current foster parent.
- Children who live across state lines but go to school in Kansas. These circumstances required staff to manually work the case to ensure eligible children received benefits and prevent

children from receiving benefits twice. Oklahoma used direct issuance for SNAP households, so without the manual checks, those families could potentially have received benefits from Oklahoma for SNAP and from Kansas for National School Lunch Program (NSLP).

- DCF staff were anticipating families experiencing homelessness would need additional support due to their transient nature but based on returned mail found that current mailing addresses weren't an issue for homeless families because they provided current addresses through the registration portal.

Newly eligible families received P-EBT benefits through direct certification, applying for F/RP meals through their school, or applying for P-EBT benefits through the registration portal. Benefits for newly eligible children were prorated and July 1 was the cutoff date as anyone newly eligible on July 1 or after is eligible for the new school year.

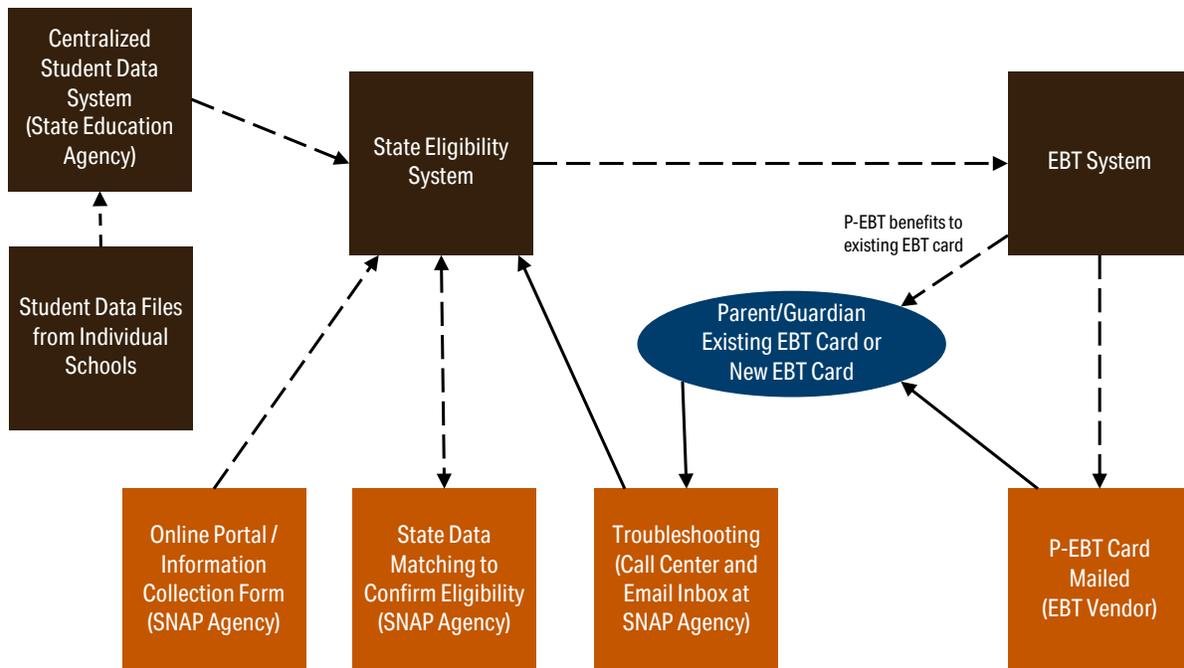


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Kansas. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represents the customer 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

KSDE conducts daily matches with DCF for direct certification, but those working on P-EBT didn't have a clear understanding of how KSDE matches students. Data matching for P-EBT required file-sharing in the opposite direction. NSLP data is stored at the school district level and school Point of Service (POS) systems vary as SFAs are permitted to choose their own. KSDE worked with SFAs and schools to upload whatever data they had into a secure portal using whatever format was available to them, including data either from their POS system or a spreadsheet (for small districts or private schools). KSDE also offered

schools a template spreadsheet and followed up for completed versions with the few private schools that did not submit lists through the portal.

Matching information between lists of children approved for F/RP meals provided by KSDE and DCF's eligibility benefit system to confirm eligibility was challenging. It required a lot of manual labor and time to "clean" the data, track down missing information, and make technical changes. The timing of the data request, which came at the end of the school year, also proved challenging. In some circumstances there was no one working in the school, which made requests for data files difficult and limited availability of school staff to troubleshoot data limitations and data entry challenges that would cause data matching to fail, such as nicknames, first name switched with last name, more than one name in the name slot, or address all in one cell instead of broken out into different lines.



"The SNAP agency didn't know the child nutrition language, and school districts don't speak the SNAP language. It was hard for us to come in from the side and try to do revisions."

– Child Nutrition official

Systems and Contracts

One critical advantage for Kansas is that DCF's eligibility system is only three years old and a modern platform meant that DCF did not have to create any system workarounds to process or authorize P-EBT benefits. Nonetheless, the P-EBT benefit code and registration portal took time and resources to stand up, and DCF made systems change requests to their information technology vendor in the amount of \$1.5 to \$2 million. Their vendor (Accenture) completed the work pro-bono, a meaningful contribution given that otherwise the state would have had to contribute half that amount.

Kansas used existing SNAP card stock, rather than the generic white plastic card, despite their EBT vendor's (FIS) preference for generic cards. DCF saw advantages for using SNAP cards because if a family received P-EBT benefits and later applied for SNAP they would not need a new card.

Inter-agency Collaboration

DCF and KSDE had an existing relationship due to the direct certification process. Though KSDE's involvement earlier on in the development of the P-EBT state plan may have strengthened their collaboration, communications, and approach, both agencies shared the mission to support families through implementing this program and worked long days and nights to overcome challenges and limitations to reach as many eligible children as possible.

Troubleshooting

Kansas's prioritization of P-EBT required a significant investment of staff time from DCF and KSDE in addition to their other duties. DCF established a call center, an email inbox, and the registration portal as mechanisms to address family inquiries. The three most common inquiries from families were:

1. Questions about eligibility. A lot of families had questions about eligibility given that this was a new program. Those questions were amplified when there were multiple children in the family and some children received benefits in advance of others. For example, families had questions such as "I received benefits for two of my children but not my youngest child and I don't understand why."
2. Questions about the status of benefits. In some cases, it took 6-8 weeks for benefits to be processed after families registered on the portal, which felt like a long time to families struggling to put food on the table.
3. Confusion about whether or which type of benefits they had received. Families expressed confusion because information changed and also because SNAP emergency allotments were issued at the same time, so families didn't know which benefits they were receiving.

Another reason that families called DCF was to request a security code to activate the P-EBT card in lieu of a Social Security number, which is FIS's standard EBT card activation process.

DCF staff were overwhelmed by the volume of calls to the call center. In addition, some families couldn't get through to the call center so they would call a regional DCF office, which would tell them [incorrectly] to call their school. Schools were inundated with calls but couldn't help as they did not have any training and could only rely on the state's P-EBT FAQ's. Staff found the number of calls coming into KSDE, SFAs and schools asking about P-EBT benefits to be overwhelming. This was especially true because staff were providing grab-and-go meals at the same time. Some callers became angry because they were getting directed to multiple offices without getting help.



"P-EBT took priority and other projects got put off"

– SNAP official

Outreach and Communication

DCF conducted a town hall, created talking points for staff, facilitated live Q&A on social media, and released Q&As and Kansas Appleseed advocates hosted webinars to disseminate information. KSDE also released Q&As and information to SFAs about communicating with families. Press releases, radio ads and social media were other mediums for outreach and information.

After the first phase was implemented and some children were receiving benefits, other families started anticipating theirs too, without realizing they had to go through a registration process. The state pivoted and changed the communication approach when

the implementation approach changed to explain that families would need to register, but the registration portal was not initially live. Word of mouth played a big role in information sharing and the desperation for information sometimes led to inconsistent and inaccurate messaging. Some families received emails with the registration portal links from DCF and others received emails from KSDE, which may have added to the confusion about whom to contact with questions. Confusion about who to contact seemed to affect SFAs as well when the call center was busy and eventually the “confidential” link to the registration portal was released publicly.



**“More consistent outreach messages.
Bad information is worse than no information.”**

– Child Nutrition official

Outcomes to Date

Kansas has been tracking data on the number of children estimated to be eligible and the actual number of children benefits have been issued to, as well as the estimated and actual amount of P-EBT benefits issued. When the P-EBT registration portal closed on July 31 the vast majority, 93% (159,258) of eligible children, had been reached.

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.

1. Develop standards around student enrollment and NSLP data so that information is updated regularly, and quality assurance efforts are in place to make data sharing and “cleanup” less cumbersome. This will reduce challenges around matching data fields for things like the name and address and could improve the likelihood of being able to issue benefits directly without extra work for state agency staff or households.
2. Establish consistent and clear communication between agencies and through outreach campaigns to families, including working with community-based partners and advocacy organizations who can help with targeted outreach to communities who are harder to reach. Determining the most efficient roles and responsibilities and developing strong, coordinated communications plans both for outreach and for troubleshooting with families should reduce inquiries from confused families.
3. Increase collaboration and coordination from the very beginning, even if it slows down the process initially, could help make efforts more effective later on. Implementing P-EBT intensified

collaboration in a new way and joint planning early on set states up to be better able to anticipate data challenges and coordinate on external communication and troubleshooting.

Appendix

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

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

Additional materials including FNS letter of approval, P-EBT FAQ, P-EBT Flyer, Policy Memo, Social Media communications, and state plan summary can be found in the resource library available at

<https://www.cbpp.org/pandemic-ebt-resource-library>.