

Documenting P-EBT Implementation

Pennsylvania Case Study

Overview

Pennsylvania directly issued more than \$360 million in Pandemic EBT (P-EBT) benefits to nearly one million children between May and August 2020. Pennsylvania was the third most populous state to directly issue P-EBT benefits after New York and Florida. Although Pennsylvania's state agencies struggled to stand up this complex new program and respond to parent inquiries due to limited resources and a short timeframe, the vast majority of eligible children received P-EBT benefits to help feed their families in a time of great need.



"I don't think there are a lot of other programs set up at the federal level and implemented at the state level that can get that much benefit out to that many people in 90 days."

– Pennsylvania SNAP official

State Context

The Pennsylvania Department of Education (PDE), in close partnership with the Pennsylvania Department of Human Services (DHS), led the state's P-EBT implementation. PDE was responsible for identifying children eligible for P-EBT, while DHS was responsible for issuing P-EBT benefits via Electronic Benefit Transfer (EBT) cards. Pennsylvania was the only state that reported that the Child Nutrition agency (PDE), rather than the Supplemental Nutrition Assistance Program (SNAP) agency (DHS), was considered the lead agency for P-EBT during the 2019-2020 school year.

DHS and PDE have a long history of working together on direct certification (the process of automatically enrolling children in households receiving SNAP and other means-tested benefits for free school meals). The agencies reported enjoying very open communication with each other and collaborating well throughout P-EBT implementation.



"We did not have recurring meetings; we were just on speed dial with each other. I can't imagine not having that close relationship to get through this."

– Pennsylvania Child Nutrition official

Implementation Overview

Plan Design

Pennsylvania submitted its P-EBT plan on April 20 and it was approved on May 6.² In Pennsylvania's approved P-EBT plan, the state anticipated directly issuing P-EBT benefits to 443,000 SNAP households and 128,571 non-SNAP households, reaching 958,000 children overall. DHS estimated that 680,000 of these children (over 70%) already receive SNAP, TANF, and/or Medicaid benefits.³ The P-EBT benefit was calculated to be \$370.50 per child (\$5.70 per day x 65 days). In August, Pennsylvania DHS provided updated information, reporting to have issued \$367 million in P-EBT benefits to a total of 991,843 children.⁴

Pennsylvania designed P-EBT to reach all eligible children through direct issuance, which thrilled local anti-hunger advocates. Most children with an active SNAP or TANF case received P-EBT benefits on their household's existing EBT card. Children who could not be matched to a SNAP or TANF case – including children enrolled in Medicaid, approved for free or reduced-priced (F/FP) school meals via an application, or attending a community eligibility school – were mailed a generic P-EBT card for activation.



"The Wolf Administration is committed to doing everything in its power to make sure that families have the resources they need during this public health crisis. I am calling on the USDA to approve this plan quickly so we can get this benefit into the hands of parents who need it."

– DHS Secretary Teresa Miller¹

Student Data

The Commonwealth of Pennsylvania does not have a statewide student information system. PDE needed to build a comprehensive list of all children approved for F/FP school meals in the state. Doing so required a combination of techniques, ranging from pulling data from an optional student eligibility information system to providing labor-intensive support for individual schools without electronic records, as described below.

¹ DHS Press Release, April 20, 2020. Available at https://www.media.pa.gov/pages/dhs_details.aspx?newsid=520

² See FNS Letter: P-EBT Approval of Pennsylvania State Plan, May 6, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/Pennsylvania%20PEBT%20Approval%20Letter.pdf>

³ DHS Press Release with P-EBT Plan Submission to FNS (April 20): https://www.media.pa.gov/pages/dhs_details.aspx?newsid=520

⁴ 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.

Optional Student Eligibility Information System

PDE's starting place for student identification was PrimeroEdge, a school nutrition software system.⁵ In Pennsylvania, all schools participating in the National School Lunch Program (NSLP) are required to use PrimeroEdge for direct certification. Schools have the option – but are not required – to use PrimeroEdge for F/RP meal eligibility determinations (i.e. direct collection of school meal applications and imports from DHS) and point-of-service processing (i.e. meal account management).

Approximately half of Pennsylvania's 870 local education agencies (LEAs, i.e. all schools or school districts) use PrimeroEdge's optional functionality. In these LEAs, all the student information needed for P-EBT issuance (student name, birthdate, mailing address, F/RP meal certification) was available through this software. Even so, state officials reported that some addresses were out-of-date and other information, such as parent/guardian name, was occasionally blank, since only half of the 15 available data fields are required.

In the nearly 400 other LEAs, PrimeroEdge stored all necessary information for directly certified children, but not for children approved for F/RP school meals via an application or enrolled in a Community Eligibility Provision, Provision 2 or Provision 3 school.⁶ For these LEAs, PDE staff worked directly with local administrators to compile, clean, and transfer data on students eligible for P-EBT. These were mostly small schools, some of which still use paper filing systems and/or collect paper F/RP meal applications. To facilitate data submission, PDE created and disseminated a Student Import Excel Template for these school administrators. PDE also performed quality checks on all data to identify anomalies (such as birthdates outside of the normal range for school-aged children) or missing information, such as missing addresses or student eligibility dates needed to determine the student's P-EBT benefit amount. When errors were found, LEAs were contacted and asked to revise and resubmit their files.

Commitment to Full School Participation

PDE was committed to every school participating in P-EBT. PDE sent numerous email reminders and made phone calls to remind LEAs to submit student data and offer technical assistance, with every LEA receiving at least 3 correspondence attempts. PDE also hired a vendor for a call campaign to LEAs where outstanding information was still needed to reach full participation. After sending "last chance" reminders to approximately 30 non-responsive LEAs in July, PDE withheld reimbursement claims until student data was submitted for P-EBT.

PDE reported that some LEAs were confused by the data submission process and what was being requested of them. For example, some schools assumed they had already submitted the necessary data by uploading total student enrollment lists, without indicating which children

⁵ <https://primeroedge.com/>

⁶ More information on CEP can be found in <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf> and on CEP and Provision 2 in <https://frac.org/wp-content/uploads/frac-facts-offering-free-breakfast-to-all-students.pdf>.

qualified for F/RP meals. By contrast, community eligibility schools were asked to submit their complete student roster, minus directly certified children, which caused some confusion. PDE staff noted that this effort was complicated by the fact that all communication was happening in an emergency situation with LEA staff working from home, while information, tools, and data were often only accessible from within school buildings.

Prioritizing LEA Data

For directly certified children, Pennsylvania prioritized student data provided by LEAs over information in DHS' eligibility system. State officials reasoned that, because P-EBT is a replacement for meals provided through NSLP, school-level information should take precedence over DHS' existing SNAP, TANF, and Medicaid records. This prioritization meant that, unlike in other interviewed states, Pennsylvania did not match all children currently enrolled in SNAP against a master eligibility list to ensure they attend an NSLP school. Instead, PDE sent direct certification data stored in PrimeroEdge to DHS with an indicator of the reasons the child was directly certified, such as enrollment in SNAP, TANF, or Medicaid. DHS then only matched children directly certified due to SNAP or TANF enrollment against DHS' eligibility system.

Another consequence of DHS' reliance on PDE for student information was that for children directly certified through Medicaid, P-EBT cards were mailed to the address on file with the school district, rather than the address known to DHS. DHS' data was only used when information was missing in the school's data, or where data errors were suspected (e.g. a Philadelphia address with a Pittsburgh zip code). State officials understood that both sets of addresses were imperfect and ultimately decided to prioritize information most closely associated with NSLP. Advocates reported that this decision may have had unintended consequences for children in foster care, among other groups, since their Medicaid case was more likely to have updated address information than their local school district. PDE provided guidance to LEAs on the correct address to use for students identified as Foster or Homeless.

Timeline

Phase 1: This phase included children directly certified for F/RP school meals due to enrollment in SNAP, TANF, or Medicaid benefits. Households with active SNAP or TANF cases received P-EBT benefits on their existing EBT card. Children in households with closed SNAP or TANF cases, along with those receiving Medicaid, were mailed a white P-EBT card. The Phase 1 file was sent to the EBT vendor over a period of three days from May 28 through May 30.

One notable exception is children enrolled in the School District of Philadelphia who only receive Medicaid benefits. This group was postponed until Phase 2 to give the school district time to collect updated address information from these families.

Phase 2: This phase included children approved for F/RP school meals in LEAs that used PrimeroEdge to track student eligibility for F/RP meals and/or as a point-of-sale system for school meals. As noted above, Phase 2 also included children enrolled in the School District of

Philadelphia with Medicaid coverage. The Phase 2 file was sent to the EBT vendor over a period of three days from June 8 through June 10.

DHS officials noted that because approximately 300,000 new P-EBT cards needed to be printed and mailed by Pennsylvania’s EBT vendor, the first two phases took longer than expected to distribute P-EBT cards to eligible families. This contributed to the high volume of inquiries from families in mid to late June (described further below).

Phase 3: This phase included children attending LEAs that do not use PrimeroEdge software for anything other than direct certification. These LEAs had to manually submit student eligibility data to PDE. This phase also included children who became newly eligible for P-EBT after PDE sent Phase 1 and Phase 2 lists to DHS. Phase 3 files were sent to the EBT vendor on July 3, July 10, and August 3.

Phase 4: This phase was intended for resolving issues that emerged during the first three phases. Although originally projected to wrap up by the end of July, DHS posted a website updated on September 17, saying, “DHS is aware that some families are still trying to access P-EBT benefits. We are working to resolve these issues and distribute benefits as quickly as possible.”⁷

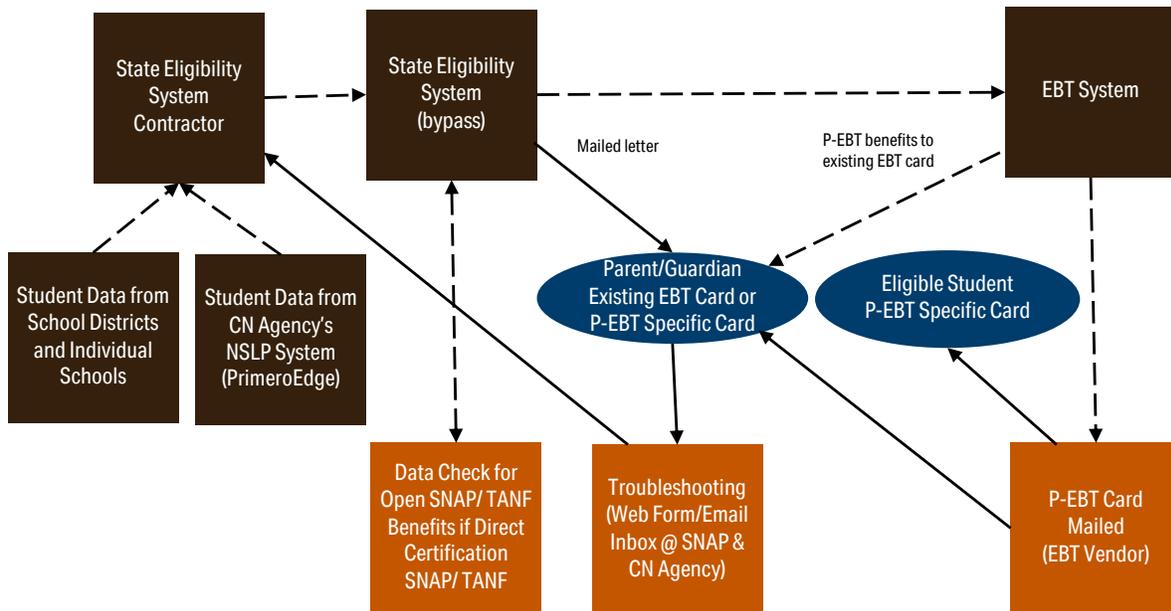


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Pennsylvania. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represent the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

⁷ <https://www.dhs.pa.gov/providers/Providers/Pages/Coronavirus-Pandemic-EBT.aspx>

Newly Eligible Children

Children who became newly eligible for F/RP school meals after the onset of the pandemic were eligible for P-EBT in Pennsylvania. These families could access P-EBT either by enrolling in SNAP or completing an application for F/RP school meals through Pennsylvania's multi-benefit online application, which includes F/RP school meals, before June 12.⁸ Pennsylvania's online infrastructure for school meals and direct certification appeared to allow for easier incorporation of newly eligible families compared to other states.

Per FNS instructions, newly eligible families received a smaller P-EBT benefit, based on the month they enrolled in SNAP or F/RP meals. For some children who received free meals at a community eligibility school, an unexpected system error mistakenly identified them as "newly eligible" if they applied for another DHS benefit (SNAP, TANF or Medicaid) and as a result they received smaller benefits. After this error was identified, DHS and PDE posted a website message saying *"DHS and PDE are aware of this issue and will be taking steps to issue the remaining balance due to children affected by this issue."* DHS reported that supplemental issuances to impacted children were issued on August 23.

Systems and Contracts

After an initial analysis of system capabilities, Pennsylvania DHS decided to bypass their SNAP eligibility system (called eCIS) for P-EBT implementation. DHS officials determined that P-EBT would have required the creation of an entirely new benefit category and program, since FNS required issuances to be tracked separately from SNAP. DHS considered using the Disaster SNAP program code, but that would have required taking applications, which the agency did not have the resources to do. Instead, DHS used a file transfer process to send the master student eligibility file directly to the state's EBT vendor (Conduent) for benefit issuance and card mailing.

PrimeroEdge created and provided a P-EBT collection tool. This tool was used to collect information from P-EBT recipients to report any issues they may have had with receiving a P-EBT card and/or benefits. A weekly export of this data was extracted and provided to DHS. The tool was created and provided free of charge. The tool is now being used to report lost P-EBT cards.

Communication

PDE and DHS shared responsibility for educating the public and key stakeholders about P-EBT. PDE developed a memo for schools that requested, but did not require, them to communicate with families about P-EBT and request updated addresses. Some districts, like the School District of Philadelphia, embraced the opportunity and used multiple communication channels to engage families and request updated addresses, including a text message and robocall campaign in English, Spanish, and Chinese. Other districts did little to inform or engage families, given the competing priorities of the pandemic. Advocates reported that some smaller charter schools that participate in NSLP were unaware of P-EBT, and told families they didn't qualify. With more time, advocates hope that Pennsylvania will be able to

⁸ <https://www.justharvest.org/faq-about-pandemic-ebt-in-pennsylvania/>

create template outreach materials, social media models, and/or robocall scripts for schools to communicate with families.

Apart from school engagement, DHS and PDE issued several press releases and developed a webpage with a detailed overview of the program. All county DHS offices responsible for processing SNAP, TANF, and Medicaid benefits received a memo outlining P-EBT to help answer basic questions that DHS customers might have. The Secretary of DHS also held regular briefings with advocates and state legislators about pandemic response measures, including P-EBT. In an effort to help families determine if they were eligible, PDE also published a public web page listing all LEAS that participate in the National School Lunch Program.

After P-EBT issuances began in Pennsylvania, DHS mailed a standard letter to every household that qualified for P-EBT, including those enrolled in SNAP, to let them know P-EBT benefits were on the way and to provide the DHS website address to learn more. The letter also included language about how to activate the P-EBT card. The P-EBT cards were mailed separately from Conduent. Because of DHS' letter, Pennsylvania families may have been less likely to miss the P-EBT card in the mail or assume it was a scam compared to other states that did not directly contact every P-EBT eligible household.

Troubleshooting

Once DHS began issuing P-EBT benefits, two separate communication channels were available for Pennsylvania families to inquire about the status of their child's case and to report problems. DHS set up an email address, and PDE set up an online inquiry form via PrimeroEdge.⁹ (See Appendix A.) Both agencies were quickly inundated by the number of individual inquiries they received from schools and parents before all P-EBT cards had been mailed. By late June, PDE had received more than 17,000 online inquiries, and DHS reported receiving approximately 1,500 emails per day, many of which were duplicative. In addition, individual staff members at PDE and DHS received hundreds of calls and emails from concerned parents after contact information was shared by confused school districts who couldn't answer parents' individual questions.



“The intensity ramped up as issuances began and public expectations were raised.”

– Child Nutrition official

Limited Staffing

Without additional administrative funding to support P-EBT, both agencies relied on existing staff members to respond to these inquiries, in addition to their other duties. PDE reported assigning 5 staff members to support cases amidst their other responsibilities. DHS dedicated 6 full time staff

⁹ See <https://www.emergencymealsurvey.com/PA>; Missouri and West Virginia appear to have used the same form, though both had been disabled before September 2020.

to P-EBT, with an additional 10 part-time staff from other divisions pulled in as their job duties allowed.

Because of limited staffing and the time necessary to research each individual inquiry, a backlog of requests quickly developed. DHS created an automatic email response with basic program information to help address at least some inquiries, but most needed to be individually reviewed by a state agency employee. State agency staff responding to parent inquiries were also hampered by incomplete access to all pertinent information about an individual child's P-EBT case. For example, PDE could tell a family whether their child's name was on the master eligibility list, but not how or when the list would be transmitted to the EBT contractor for processing or when the card would arrive. Similarly, DHS staff could see EBT issuance information, but could not explain to a family why their child's name did not appear on the master eligibility list (e.g. if the child's school failed to submit student data by the deadline.)

Limited Use of Call Center

Unlike some other states, DHS decided not to have their existing call center handle case-specific P-EBT inquiries, though staff were equipped to answer basic questions about P-EBT for existing SNAP households (e.g. clearing up confusion between P-EBT and SNAP emergency allotments). At the outset of the pandemic, DHS transitioned all staff to telework at the same time that applications spiked, causing call answer rates for SNAP/TANF/Medicaid to drop to 60-70% (meaning 30-40% of callers were not able to get through). Even once the call answer rate recovered, DHS did not want to jeopardize service for existing DHS customers by adding another cohort of callers related to P-EBT. DHS viewed P-EBT as a separate education benefit and therefore not the agency's core responsibility. Advocates hope that in future P-EBT implementation, DHS will reconsider the use of a call center for parent troubleshooting, especially with full federal funding available to cover those costs.

Mail Merge Issue

Advocates reported that by mid-August, many families still had not receive P-EBT benefits, in part due to a mail-merge issue where the third address line (e.g. apartment number) was left off envelopes due to a software error, which affected between 10,000 and 11,000 households. DHS reported that replacement cards, including for those affected by this issue, were sent to families beginning on September 24. Many families were unaware of the reason for the delay and frustrated that communication channels to DHS and PDE appeared clogged. Neither agency appeared to be exclusively responsible for communicating with families, which advocates hope Pennsylvania will be able to remedy in the future.

Given the large scale of Pennsylvania's P-EBT program, it is important to keep troubleshooting numbers in context. For example, while 17,000 inquiries to PDE by late June clearly exceeded the number a small team could reasonably respond to, it represents less than 2% of the more than 990,000 children reached by P-EBT in the state.



"We appreciate that they aren't giving up. There is more work to do than they could have ever imagined, but the agencies are just going to keep working until they get it done."

– Anti-hunger advocate in Pennsylvania

Lessons Learned

Pennsylvania prioritized issuing benefits as quickly as possible, which did not leave time to build the systems infrastructure necessary for a sustainable program. During the height of implementation, agency staff shared some concrete ideas about how they could improve P-EBT for the future.

- 1. Develop a strong communication and troubleshooting plan at the outset that clearly lays out each agency's responsibilities.** DHS and PDE staff understood that families were getting stuck in troubleshooting "loops" without receiving clear information about their specific case. For example, a family waiting for P-EBT benefits for a child in a community eligibility school might first call their local DHS office, then be directed to call their local school, then PDE, then DHS headquarters, and in some cases, back to their local school to see if they had been inadvertently left off the school's eligibility list. In addition to more communication, agency staff recognized the need for shorter and clearer communication since more information will only help if staff in other agencies take the time to read and understand it.
- 2. Match all directly certified children against Pennsylvania's eligibility system to correctly identify children currently enrolled in SNAP.** Some SNAP recipients received new P-EBT cards in the mail instead of on their household's existing EBT card because the direct certification file indicated that they were eligible due to Medicaid enrollment. Pennsylvania's normal direct certification hierarchy prioritizes SNAP receipt, but if a child later enrolls in Medicaid, their direct certification date will reset and affiliate the direct certification with Medicaid. Matching all directly certified children to open SNAP households regardless of which program they were affiliated with on the direct certification file should result in more families having quicker access to P-EBT benefits.
- 3. Directly issue benefits at the individual child level rather than attempting to group children into households.** DHS initially opted to issue P-EBT benefits at the household level to avoid sending multiple cards to the same caregiver, who would then need to keep track of multiple cards and activation numbers. Since Pennsylvania ultimately needed to use a combination of methods to issue P-EBT cards (head of household, oldest child in a household, or individual child based on available data), families were confused by the mixed messaging, especially related to card activation. DHS and advocates noted that a single set of instructions for all families receiving a new P-EBT card would likely work better.

- 4. Develop new data collection and data quality practices.** PDE staff responsible for building Pennsylvania's master eligibility list for P-EBT attempted to quickly identify data quality errors (e.g. ranging from clearly incorrect birth years to missing information needed to issue P-EBT benefits), but there was not sufficient time to do this comprehensively. They also identified challenges in handling data from LEAs where some school buildings operated under the Community Eligibility Provision while others did not. Without a statewide student database, the state agencies found that the quality of data school districts provided varied substantially and data inaccuracies contributed to implementation challenges. Agency staff hope that other states will share best practices and lessons learned from data quality efforts for future P-EBT implementation.

Appendix

More information on Pennsylvania's P-EBT program is available at <https://www.cbpp.org/sites/default/files/atoms/files/9-14-20fa-stateprofile-pa.pdf>.

Additional materials including FNS letter of approval, screenshot of P-EBT website, social media announcement from the Governor's Office, and P-EBT Inquiry Form can be found in the resource library available at <https://www.cbpp.org/pandemic-ebt-resource-library>.