

Documenting P-EBT Implementation Alabama Case Study

Overview

With robust support from senior leadership and a sense of urgency, Alabama took decisive action to implement the Pandemic Electronic Benefits Transfer (P-EBT) program quickly at a time when school-based meal service was shutting down in parts of the state. In addition to strong state leadership at all levels, Alabama's swift implementation of P-EBT was made possible by a centralized student information system that included much of the information needed to issue benefits and a long-term partnership between the state's Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition agencies to improve data matching for direct certification.¹ In less than 90 days, Alabama issued \$144 million in P-EBT benefits to more than 460,000 children in the state.



"We knew that if we could get 90% out of the way through direct issuance and put enough resources into troubleshooting to deal with the other 10%, we could serve our state well in the midst of a crisis."

– Alabama SNAP Director

State Context

The Alabama Department of Human Resources (DHR) served as the lead agency for the implementation of P-EBT, in collaboration with the Alabama State Department of Education (ALSDE). Senior leadership in Alabama, including the Commissioner of DHR and the State Superintendent of Education, were fully committed to P-EBT and trusted that all of the agencies' decisions were in the best interest of the state at the time. This commitment was motivated by the reality on the ground that some school meal programs, especially in rural areas, were unable to continue operating when in-person instruction shut down. From the outset, Alabama's executive leadership made clear that P-EBT should (1) be implemented quickly, (2) reach as many children as possible, and (3) avoid any application requirement for families.

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). Alabama had a 97% 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 21, Alabama was the seventh state to gain approval for their P-EBT implementation plan.² After initial approval, Alabama submitted two amendments to FNS in order to reach more children, including those attending private schools and Pre-K or Head Start students who received meals through the National School Lunch Program (NSLP).³



“We’ve done some of our best work in the past couple of months.”

– Alabama SNAP Director

Plan Design

In Alabama’s approved plan and subsequent amendments, DHR identified 420,395 children eligible for P-EBT. The maximum P-EBT benefit was calculated to be \$313.50 (\$5.70 per day multiplied by 55 days). Alabama anticipated issuing up to \$132 million in P-EBT benefits to Alabama’s children if they reached all eligible children. In October 2020, Alabama DHR reported that the final number of children receiving P-EBT benefits was even higher at 461,000, for a total benefit value of more than \$144 million.⁴

Issuance Method

The vast majority of children eligible in Alabama received P-EBT via direct issuance, meaning that families did not have to apply. This included children directly certified for free school meals due to their participation in SNAP, Temporary Assistance for Needy Families (TANF), Foster Care, or Homeless/Migrant Services. Children who completed an application during the 2019-2020 school year for free or reduced-price (F/RP) school meals also received P-EBT benefits through direct issuance. Taken together, Alabama directly issued P-EBT benefits to more than 85% of eligible children in the state.

² FNS Approval of Alabama State Plan, April 21, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/AL-SNAP-COV-PEBT-Approval.pdf>

³ Alabama P-EBT Amendment 1, May 22, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/AL-SNAP-COVID-PEBT-Amendment%20Approval-Letter.pdf>; Alabama P-EBT Amendment 2, June 1, 2020. Available at https://fns-prod.azureedge.net/sites/default/files/resource-files/AL-SNAP_COV-PEBT-Amendment%20-%20Approval%20Letter.pdf

⁴ The number of children identified as eligible in the initial plans proved to be underestimates. The final number also includes children who became eligible after the plans were approved.

Community Eligibility Provision (CEP) Opt-In

The families in Alabama that were required to take action to access P-EBT were those with children attending a CEP school who were not directly certified through participation in another program.⁵ These families received a letter in the mail inviting them to "opt-in" to P-EBT by signing and returning the letter or calling DHR to opt-in over the phone. The opt-in letter only required the head of household's signature and date of birth to support the P-EBT card pinning process. According to DHR, of the 74,000 opt-in letters mailed to families, more than 65,000 (or about 88%) had been returned as of early July.

Timeline

Phase 1: Children enrolled in SNAP who perfectly matched with ALSDE's student enrollment list received P-EBT benefits on their household's existing EBT card in mid-May. This phase reached 208,000 children, representing about 85% of SNAP cases and 45% of all children eligible for P-EBT.

Phase 2: Other children directly certified for F/RP school meals, including recipients of TANF, Foster Care, or Homeless/Migrant Services were mailed P-EBT cards in late May and early June. These children were all known to DHR with addresses on file. This phase also included children with a completed F/RP meal application referenced in ALSDE's student information system. For all of these children, DHR mailed P-EBT cards to the household without requiring a parent/guardian to take any action. The phase reached approximately 173,000 children, representing 38% of all children eligible for P-EBT.

Phase 3: Children attending CEP schools who were not directly certified were mailed P-EBT opt-in letters in May. P-EBT benefits were not automatically issued to this group. DHR did not set a deadline for when these opt-in letters needed to be returned. The phase included approximately 74,000 children, representing 16% of all children eligible for P-EBT.

Phase 4: The final phase was for any remaining children deemed eligible for P-EBT, including 15,000 children attending private schools and eligible Pre-K or Head Start programs. This phase also included newly eligible children who were added each month after enrolling in SNAP or completing a F/RP school meal application. These newly eligible families received a pro-rated P-EBT benefit based on the month they applied, in accordance with FNS guidance.

⁵ This includes many students who would qualify for F/RP meals if they submitted an application, but individual applications are not collected in Community Eligibility Provision schools.

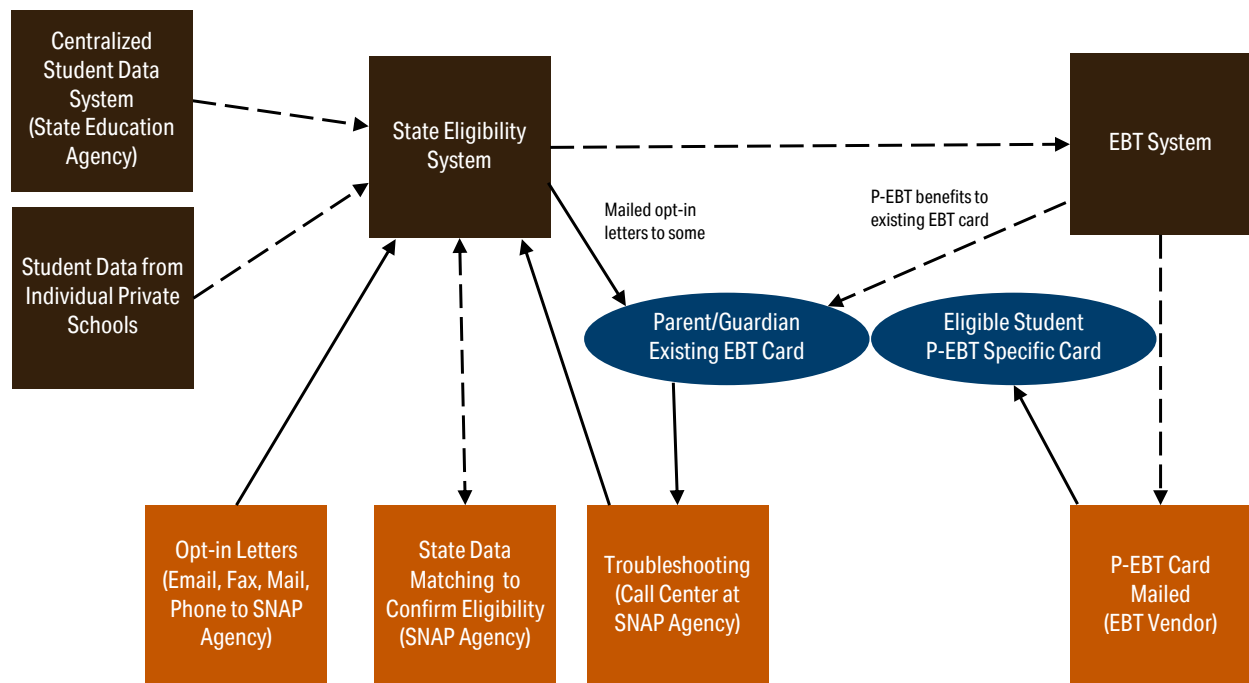


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Alabama. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represent the customer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

A critical advantage for Alabama in P-EBT implementation was ALSDE's existing centralized student information system that captured all public-school students in the state. DHR and ALSDE subsequently worked to collect eligible student lists from all private schools with considerable success.



“P-EBT is really meeting a need, especially for rural folks who weren't able to drive to feeding sites and for schools that weren't distributing food.”

– Alabama SNAP Director

Although most student data in Alabama was centralized, it was not perfect. For example, one large school district in Alabama had not uploaded data in months, so information was out of date. Some individual data elements, like zip codes, lunch codes, birthdates and other identifying information, were also missing from the central system. DHR and ALSDE kept exchanging files until they could be sufficiently confident in the completeness and accuracy of the data.

Confirming Eligibility

Alabama confirmed children's eligibility for P-EBT benefits in three ways:

1. For children already known to DHR, information from their enrollment in DHR's assistance programs was matched with ALSDE's central student information system to confirm that each child attended a school that participates in the National School Lunch Program.
2. Children identified only through ALSDE's school enrollment system as receiving F/RP meals through either traditional or CEP enrollment were eligible by definition.
3. Alabama was committed to serving every eligible child through P-EBT, even if their information could not be matched to ALSDE's central list. If families could provide some evidence of eligibility to DHR, such as a school report card to demonstrate enrollment in a CEP school, the agency was able to manually issue a P-EBT benefit.

In the final phases of implementation, DHR was especially grateful for ALSDE's central student information system to track who had already received P-EBT benefits to avoid duplicate issuances as they worked to bring in more children. DHR reflected that this prepares them well for any future audit or reconciliation process that FNS may pursue.

Systems and Contracts

DHR identified several challenges early on with their dated eligibility system. In early testing, for example, DHR identified situations where the system was erasing a household's history of SNAP allotments (which they ultimately resolved). DHR determined that the best way to issue P-EBT benefits in the eligibility system was through an existing disaster code in order to differentiate between P-EBT, regular SNAP, and SNAP emergency allotments. DHR reflected that it proved to be easier in the system to issue P-EBT benefits on a new card than to load them onto an existing SNAP account.

DHR did not identify vendor costs as a burden the agency had to bear, as existing vendor contracts had room to absorb the system changes necessary for P-EBT.

Inter-Agency Collaboration

Both DHR and ALSDE credited the strong existing partnership between the two agencies with making P-EBT a success. For many years DHR and ALSDE have worked together to improve the direct certification process with overnight batches and other techniques to achieve higher match rates. P-EBT was seen as an evolution of that partnership. Before P-EBT, student data had only moved in one direction – from DHR to ALSDE to identify which children should be directly certified for free school meals. P-EBT allowed data to flow in the opposite direction – from student information systems to DHR.

DHR appreciated that the agencies really stuck together through P-EBT implementation, even during the hardest weeks. DHR also reflected on their strong working relationship with anti-hunger advocates from years of collaboration on a SNAP work group saying, "They knew what we were doing and trusted us."



"While this has been a big investment of time and resources, we can deal with it until the end of September. We've heard lots of good stories about how much P-EBT has helped and our staff is working hard to get benefits out quickly."

– Alabama SNAP Director

Troubleshooting

Alabama's prioritization of P-EBT required a significant investment of staff time from DHR. At peak implementation, more than 100 full-time equivalent (FTE) staff were dedicated to a call center answering parent questions and troubleshooting problems. This required moving DHR staff from other responsibilities as well as approving a significant amount of staff overtime. It was important to DHR to keep this responsibility off of county-level staff who were managing an influx in applications for SNAP and other safety net programs brought on by the pandemic.

Robust staffing levels for troubleshooting translated into call center wait times that were manageable for families, without the workload backlogs described by other states.⁶ Community partners also reported that, by and large, the families they referred to DHR got the support they needed.

According to DHR, the top three reasons families contacted the P-EBT call center were:

1. Questions about eligibility
2. Updating household information
3. Benefits mailed to the wrong address

DHR anticipated and prepared for the likelihood that a small percentage of complicated cases would require a significant amount of time. For example, DHR handled a number of cases for children living with foster parents whose P-EBT benefits were issued to the non-custodial parent's SNAP account. In these cases, a P-EBT card was issued to the foster parent, regardless of whether the original issuance could be recouped from the non-custodial parent. Another example provided by advocates was that of a parent

⁶ One significant reason DHR had staff available to re-assign to P-EBT was the FNS administrative waivers in place for SNAP to suspend recertification requirements from March through June 2020. This meant the dedicated call center unit for the Alabama's Elderly Simplified Application Project had fewer administrative obligations during the peak implementation period for P-EBT.

with children in four different schools whose case took a month to resolve. Advocates reported that the vast majority of cases like these that they referred to DHR were handled swiftly and competently.

Outreach and Communication

DHR and advocates both felt more could have been done to communicate with eligible families, particularly those who already receive SNAP. Like in many other states, SNAP households did not receive a written notice explaining the P-EBT allotments deposited in their account, although DHR did issue a number of press releases explaining the process. Because DHR was issuing SNAP emergency allotments at the same time, many families did not realize they received P-EBT benefits and called DHR to ask why they did not receive a P-EBT card in the mail like some of their neighbors.

Most Alabama school districts did not take a proactive role in outreaching to families about P-EBT. Many schools were struggling with virtual instruction in a state with inconsistent internet access and were not asked by DHR or ALSDE to serve as primary communicators with families. Advocates were also unsure about which schools were accepting and processing applications for F/RP meals from newly eligible children outside of CEP districts in order to include them in P-EBT (during phase 4).

Advocates remarked that proactive outreach from schools, along with more robust partnerships with culturally-responsive non-profit groups, could have made a difference for English language learners and low-literacy readers who struggled with card activation instructions, updating addresses, or making sense of the opt-in letter for families attending CEP schools.

Outcomes to Date

Throughout the project, officials at DHR reported up to Alabama's executive leadership on critical milestones in P-EBT implementation. The central goal was reaching 400,000 children, which the state surpassed in June. Alabama requested P-EBT card activation data from their EBT vendor but did not receive it in time for inclusion in this report.



"P-EBT helped alleviate the immediate pressure we were seeing at our food bank and alleviated some of that chaos."

– Food Bank serving Alabama

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. DHR would issue benefits to each individual child, instead of to the head of household. Alabama did not originally feel comfortable with issuing benefits in the child's name, but now recognizes that it appears to have worked smoothly in other states.
2. ALSDE would try to engage schools as soon as possible so they could reach out to families and encourage them to update their addresses *before* they were used for mailing P-EBT cards. State officials better understood as implementation unfolded how many addresses had changed from when they were first collected at the beginning of the school year.
3. DHR would develop a training mechanism to quickly bring more staff into the call center to support an influx in demand from a program like P-EBT. DHR felt their responsiveness slowed down when experienced staff got pulled back into their normal duties (e.g. the Program Integrity Unit) and trained staff were needed to answer questions like how to activate an EBT card or update a child's date of birth in the eligibility system.



Appendix

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

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

Additional materials including FNS letter of approval and amendments, and an example of opt-in letter for child attending Community Eligibility Provision schools in English and Spanish can be found in the resource library available at <https://www.cbpp.org/pandemic-ebt-resource-library>.

