

Documenting P-EBT Implementation New York Case Study

Overview

The Pandemic EBT (P-EBT) program in New York served over 2.4 million children by distributing more than \$1 billion in benefits between May and September 2020. New York is the largest state to directly issue P-EBT benefits to families. The sheer size of the program slowed implementation, as did data challenges.

Nonetheless, state leadership and staff determination led to a very large number of families receiving benefits during a time of great need.



“The amount of flexibility and intelligent, creative people on the team is impressive. It is an all-hands-on-deck approach to stand it up.”

– State SNAP official

State Context

The New York Office of Temporary and Disability Assistance (OTDA) served as the lead agency responsible for the implementation of P-EBT, working in collaboration with the New York State Education Department (NYSED). OTDA designed and implemented the program, making all eligibility decisions and issuing P-EBT benefits via Electronic Benefit Transfer (EBT) cards, and NYSED played the role of liaison between OTDA and school district representatives regarding the necessary data on children approved for free or reduced-price (F/RP) school meals.

Implementation Overview

Plan Approval from Food and Nutrition Services (FNS)

Once leadership in New York decided to pursue P-EBT, it took six weeks and six rounds of negotiation with FNS, which required the state to provide detailed documentation about how implementation would work, before the plan was approved on May 6.¹ This was happening at the same time OTDA was administering a host of emergency Supplemental Nutrition Assistance Program (SNAP) waivers. Advocates reported OTDA worked hard to get the biggest impact possible from P-EBT. New York’s amended plan was approved on May 8 with a revised estimated number of eligible children, which included additional children attending Community Eligibility Provision (CEP) schools.

¹ FNS Approval of New York’s P-EBT Plan, May 6, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/New%20York%20PEBT%20Approval%20Letter.pdf>

Plan Design

In New York's amended P-EBT plan, the state anticipated serving over 1.7 million children and the maximum P-EBT benefit was calculated to be \$420 per child (\$5.70 per day multiplied by 74 days on which schools were closed). New York anticipated issuing more than \$885 million in P-EBT benefits.² OTDA subsequently increased their estimates and anticipated issuing \$873 million in benefits to 2.1 million children. Ultimately 2.465 million children received benefits.³

New York staged its implementation plan based on how readily available needed information on eligible children was, with the first group having the most accessible information and third group having the least. New York did not stand up an application process because they did not think they could handle the operational impact.

Newly eligible children were not included in New York's plan; the cut-off date was the date schools closed in March. OTDA attempted to quantify how many newly eligible children may have been missed by searching student enrollment data for eligibility dates between the end of March and the end of June and only found one, which suggests that newly eligible families were not applying for F/RP school meals while schools were closed.

Issuance Method

New York organized their direct issuance approach into three groups – the first being eligible children enrolled in SNAP or Temporary Assistance for Needy Families (TANF), the second being eligible children directly certified for free school meals through Medical Assistance, and the third being all other eligible children approved for F/RP school meals. New York used existing EBT cards and existing Medicaid cards (Common Benefit ID card or CBIC) as the most expedient way to get benefits to the first and second groups.

Timeline

Group 1: New York received approval from FNS to assume that all children in SNAP or TANF households between age 5 and 18 as of March 2020 were P-EBT eligible. The state added P-EBT benefits for these families onto their existing EBT cards in two payments in June, which went relatively smoothly. As of July 2, 708,000 children in this group had received P-EBT benefits.

Group 2: The second issuance group included children directly certified for free school meals through Medical Assistance. This group was estimated to include 603,500 children. EBT accounts were either linked to existing Medicaid cards (called a Common Benefit ID card or CBIC) or P-EBT benefits were issued on new EBT cards. Siblings were included on either the oldest sibling's

² FNS Approval of New York State's Amended P-EBT Plan, May 8, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/NY-SNAP-COV-PEBT-Amendment%20Approval%20Letter.pdf>

³ OTDA believes that more children were eligible than initially anticipated due to a pre-pandemic misunderstanding of the school meal program's participation reporting requirements by some school districts. Some CEP districts reported only children who were directly certified as eligible for free meals, not all the children in the school district.

account or the parent/guardian's account. Benefits for group 2 were issued in one payment between late June and August.

Group 3: The third group consisted of all remaining eligible children, approximately 1.1 million. Collecting the necessary information was a tremendous challenge due to the variation and quality of the data. In addition, 80% of the children in this group are in Community Eligibility Provision (CEP) districts, which state officials reported being easier to issue benefits to due to using student enrollment data, but more time consuming because they had to sort out confusion around data requests when school districts expected to share direct certification or school meals data. For this group it was not possible to aggregate children by household, so each eligible child was sent a P-EBT card in the mail. Benefits for this group were issued in one payment between August and October.

Notices

New York decided to issue notices to some families to make them aware of P-EBT benefits. The second and third issuance groups received individual notices in the mail, but not the first. Mailing notices was a challenge in itself given the large volume (more than 1.7 million pieces of mail) that was necessary. Advocates reported that the lack of individual notices for SNAP recipients left some families confused about what benefits they had or had not yet received, especially if they were getting regular SNAP, an emergency allotment, and two P-EBT payments.

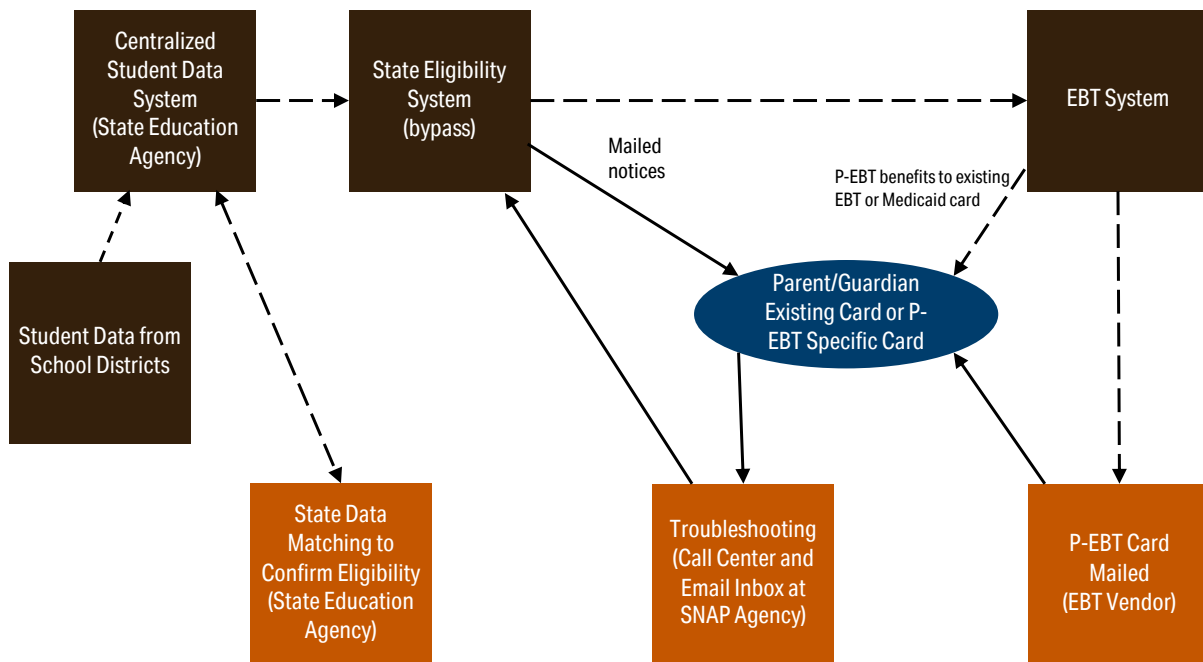


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in New York. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipse represents the customer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

NYSED compiled student data on approximately 2.1 million children from 1,200 school districts, whose staff uploaded the data onto a secure website. NYSED gave school districts a spreadsheet template to put data in a specific format. Each district had a representative who was assigned to this task and would communicate between the school district, schools, and NYSED. NYSED also worked with a consulting company who helped with the data matching process. School district representatives would do some data correction, like formatting date of birth, then the consulting company would clean it up and export it from the spreadsheet template to a format compatible with OTDA's system. It was a major administrative and logistical challenge to pull together the data. NYSED continued to accept and work with school districts to get the best possible student data through the duration of implementation.

NYSED also reported that developing the data sharing agreement between agencies was a significant amount of work but was needed so that NYSED could match student enrollment data and Medicaid data from the Department of Health before sending lists to OTDA.

The biggest challenge was data that was flawed or outdated, which made the process unreliable. Information coming from school districts was often inaccurate, especially address information. There was a range of address challenges, including inaccurate addresses, schools that didn't collect addresses at all, or addresses not recognized by United States Postal Service (USPS) because of formatting issues. It was hard for advocates or families to take any action through the schools to update information, in part because schools were closed for the summer during a large portion of implementation and there weren't staff on site for families to contact, but they could update their address through OTDA and over 50,000 families did.



"Data was the biggest challenge. Some staff have been working with schools daily to get data. It was a lot to pull off, so we are proud of that."

– State Child Nutrition official

Systems and Contracts

OTDA was not able to issue P-EBT benefits within the state's eligibility system and instead used a "host-to-host" process meant for emergencies, which limits processing to 250,000 cases a week and required a lot of additional staff time and innovation to support.

New York's EBT vendor is Conduent. OTDA couldn't change the EBT card activation mechanism with Conduent, which became an area of confusion for families, which OTDA responded to as discussed in the troubleshooting section below.

Troubleshooting

OTDA set up a call center and an email inbox to respond to family inquiries. The email inbox went live while OTDA was working on building

capacity for the call center and advocates reported the delay was challenging. Once the hotline number went live, call volume exceeded capacity by five times. OTDA responded by increasing capacity by training additional staff from other programs and also expeditiously developed a database to help track the types of incoming calls and those that required staff follow-up and manual processing.

Schools and school districts were also getting calls from families inquiring about when benefits would arrive and how to activate their card. NYSED passed along OTDA's P-EBT FAQ to school district representatives and encouraged school districts and schools to provide information about the daily grab-and-go meals that were available and food pantries to meet families immediate needs and refer families to OTDA for answers to their P-EBT specific questions.

County SNAP offices were also receiving phone calls but were unable to provide assistance to families directly regarding P-EBT.

Some of the common inquiries received included:

1. Attempts to provide a current mailing address, which could require multiple contacts. For example, if the family's address on file with Medicaid was incorrect and they didn't receive their notice or P-EBT card, they might have contacted the state hotline to inquire about P-EBT and have been directed to call their county SNAP office to update their Medicaid address, and then directed to call the P-EBT hotline back to request that a new P-EBT card be issued.
2. Questions about eligibility and confusion over which types of benefits had or had not been received for which child. For example, some families received P-EBT benefits for all children in their household at once while others received P-EBT benefits for only one. Families also expressed confusion about whether P-EBT is only for SNAP/Medicaid recipients, or only for CEP schools, questions about eligibility for children in Head Start, children who are home schooled, etc.
3. Confusion around use of the Medicaid card and how to access P-EBT benefits. Families did not know which card their benefits were added to, especially when there were multiple children on the Medicaid case or when the parent had their own Medicaid case. If families had lost their Medicaid card, they would have to work with the local county office to get a replacement.



"P-EBT is depleting all resources. This has taken all of our staff. It has been all-consuming of resources and time."

– State SNAP official

4. Problems activating EBT or CBIC cards due to the inaccurate prompt on the EBT vendor automated hotline. The prompt asks for last 4 digits of the Social Security number, which is the typical method used for activating SNAP EBT cards, instead of the month and date of birthday, which was used for P-EBT. OTDA explained this in the notices and produced a video walking through the activation process to help.⁴



“We are really glad we didn’t make families go through the application process. It has been a lot of work for state agencies and advocates to do behind the scenes and we’ve been graced with good relationships and transparency, which lets us give them grace. Also empowers us to communicate with families. The state worked really hard to not have an application process for families.”

– Anti-hunger advocate

Outreach and Communication

Outreach and communication methods used were different based on the three issuance groups. For Group 1, OTDA worked with community partners and county SNAP offices, and utilized social media announcements and public messaging to spread the word; for groups 2 and 3 OTDA also issued notices.

Anti-hunger advocacy organizations, such as New York Hunger Solutions, worked to provide information, including an outreach toolkit to schools and organizations, such as education associations, to answer family questions.⁵ Hunger Solutions also secured funding to do paid social media outreach, including Facebook ads, and were overwhelmed with messages from families through email inquiries, direct messages, and comments on the ad itself, with only three staff to manage responding. The volume of traffic to their P-EBT materials far exceeded anything Hunger Solutions has ever published, with the P-EBT FAQ webpage reaching 50,000 hits at the end of June.

NYSED provided information to school districts but did not do any outreach to families or share guidance with school districts or schools on how to do so. Advocates saw this as a missed opportunity as schools are trusted messengers and they could have been better positioned by the state to communicate about P-EBT to families. Advocates worked to fill the gap by partnering with other organizations to send mass emails to education partners working within school districts and some of that information showed up in parent outreach that schools did. Advocates and community partners also utilized television and print media and conducted webinars, including for the School Nutrition Association, SNAP outreach grantees, and other community-based membership groups, to help get information out.

⁴ OTDA’s “Activating a Pandemic-EBT card to access food benefits” video can be found here <https://youtu.be/JvWV-FvyA5Y>

⁵ Hunger Solutions New York P-EBT Toolkit can be found here <https://hungersolutionsny.org/covid-19/pebt/>

Targeted Outreach

Anti-hunger advocacy groups conducted personalized outreach through the Office for New Americans, a state-level office created by statute to help immigrants fully participate in New York State civic and economic life, specifically providing information that the public charge rule does not apply to P-EBT benefits and therefore does not impact immigration status. Advocacy groups also created public-facing outreach materials in Spanish, which were also made available to partners.

There were additional outreach efforts in New York City – including by the city's Department of Education, which conducted outreach to non-English speakers specifically. New York City's newly appointed Food Czar, part of the Mayor's senior leadership team responding to COVID-19, created outreach flyers in 13 languages with a system to distribute them throughout city agencies.

Outcomes to Date

At the time of the interview in early July, OTDA was in the midst of implementation and though there were plans to track outcomes, they did not have enough cumulative outcome data available to conduct analyses. They were tracking undelivered mail and cards that were returned in real time. OTDA reports returned mail rate was low, at about 4.4%, and that they processed over 50,000 address changes through the hotline and P-EBT email inbox. Additional address change requests came through NYSED and county social services agencies. Advocates report New York is conducting outreach using text messaging to Medicaid households that have yet to spend their P-EBT benefits based on redemption data outcomes.

Lessons Learned

OTDA administrators reflected that New York has a lot to be proud of with P-EBT implementation, serving a large volume of children without an application process. In the midst of implementation, state agencies and advocates shared some ideas about how they could improve P-EBT for the future.

1. Develop a more collaborative and strategic communication plan to reduce confusion about a new program and provide updates on when benefits would be issued so families could plan accordingly.
2. Take time up front to better understand data needs and develop a standardized process for updating information – especially addresses.



"It is basically a new SNAP program that encompasses even more children than the original. Impossible to imagine long-term sustainability."

– State SNAP official

Appendix

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

Additional materials including FNS letter of approval, amendment approval, FAQs, and sample social media communications, can be found in the resource library available at
<https://www.cbpp.org/pandemic-ebt-resource-library>.