Documenting P-EBT Implementation
Minnesota Case Study

Overview

Minnesota senior leadership fully supported implementing a Pandemic Electronic Benefits Transfer (P-EBT) program, including strong endorsements from the Governor and Lieutenant Governor. Minnesota served approximately 267,000 children by issuing more than $86 million in benefits to families over four months for the 2019-2020 school year. The state Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition agencies were determined to reach as many families in need as possible and were able to reach two-thirds of eligible children within 6-8 weeks and 82% overall, despite challenges, including not being able to serve families that became newly eligible for P-EBT during the implementation period, difficulty reaching eligible children at non-public schools due to data limitations, and data systems incompatibilities that required significant staff time when automation was not an option.

> "The program is great, and it has done a lot of good for a lot of families. I just wish we had had more time to implement the program."
>
> – Anti-hunger advocate

State Context

The Minnesota Department of Human Services (DHS) served as the lead agency for the implementation of P-EBT, in partnership with Minnesota Department of Education (MDE). The Minnesota Automated Reporting Student System (MARSS) is the student record system that serves as MDE's primary reporting system for student data and is where information is stored on students who receive free and reduced-price (F/RP) school meals through the National School Lunch Program (NSLP). DHS was responsible for issuing P-EBT benefits via Electronic Benefit Transfer (EBT) cards. DHS and MDE had an ongoing relationship due to establishing and maintaining a direct certification process, which implementing P-EBT intensified.[1]

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[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). Minnesota 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.

Implementation Overview

Plan Approval from Food and Nutrition Services (FNS)

Minnesota gained approval of their P-EBT implementation plan on May 27.[2] DHS took the lead on drafting the plan and sought FNS technical support on how they could include newly eligible families in their plan, but ultimately decided the barriers were too high and there was not enough time to implement a plan to reach them. Minnesota did not make any amendments to their plan.

Plan Design

In Minnesota's approved P-EBT plan, FNS identified 349,952 children eligible for P-EBT. The maximum P-EBT benefit was calculated to be $325 ($5.70 per day multiplied by 57 days in March through June 2020 on which schools were closed). Minnesota anticipated issuing approximately $114 million in P-EBT benefits to Minnesota children if they reached all eligible children.

P-EBT benefits were either added to the household's existing EBT card or a new P-EBT card was issued to households who did not already have an active EBT account. Minnesota relied on their existing EBT card issuance process and issued P-EBT cards to the head of household rather than the individual child. Feedback from other states solidified their decision not to issue to children based on reported systems and program challenges implementing Summer EBT.

Issuance Method

Minnesota issued P-EBT benefits directly to children eligible for direct certification who already received SNAP or Temporary Assistance for Needy Families (TANF) benefits. To comply with an FNS requirement, only children ages 5 through 18 were directly issued benefits.

Application

All other eligible children, including those attending Community Eligibility Provision schools, had to complete an application because MDE lacked data on families and children that DHS needed to issue P-EBT benefits, most importantly addresses, names for head of household, and sometimes student data. DHS was already working with Code for America, a civic technology non-profit organization, to update another application, so when the need arose for a P-EBT application, Code for America offered to develop and host one at no cost.[3]

Timeline

Phase 1: DHS used the age range of 5-18 for children already participating in SNAP or TANF and P-EBT benefits were added to existing EBT cards in late May. DHS estimated this phase would

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[2] FNS Approval of Minnesota State Plan, May 27, 2020. Available at https://fns-prod.azureedge.net/sites/default/files/resource-files/MN-SNAP-COV-PEBT-Approval-Letter.pdf

[3] See Code for America and U.S. Digital Response Partner to Help States Reach Families with Pandemic-EBT, April 21, 2020. Available at https://www.codeforamerica.org/news/code-for-america-and-u-s-digital-response-partner-to-help-states-reach-families-with-pandemic-ebt

reach 113,000 children, representing about one-third of the overall children estimated to be eligible for P-EBT.

Phase 2: Families who applied for P-EBT benefits were matched to a list MDE generated of all students that were approved for F/RP meals to confirm eligibility for P-EBT. By the end of June, more than 200,000 children had applied for or received P-EBT. Minnesota extended the application deadline to July 31 after estimating that an additional 150,000 eligible children had not yet been reached. MDE's final estimate was that 327,000 children were eligible and Minnesota reached 82%, or approximately 267,000 children.
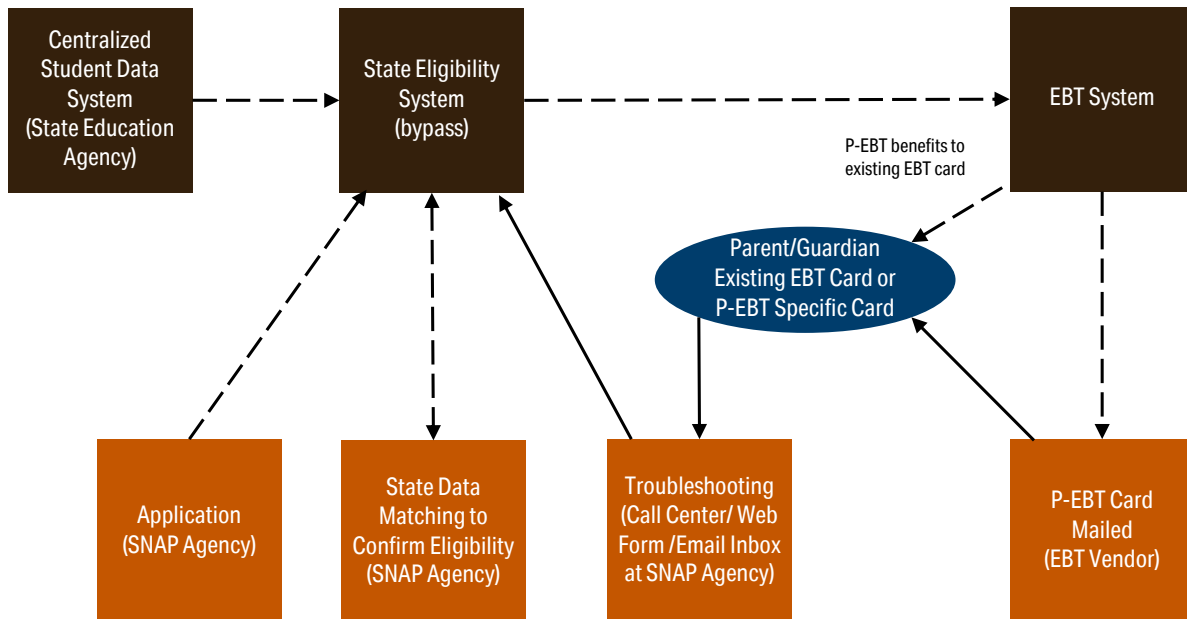

Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Minnesota. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipse represents the customer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

NSLP data in MARSS, MDEs centralized student record system, includes student's first and last name, date of birth, and gender. Less consistently available data includes student's middle name, grade, and student identification number. Addresses are not available at all. School districts have the ability to upload data any time, except for long weekends every couple of weeks when the state edits the data. School districts were submitting additional data throughout P-EBT implementation as they received it. The MARSS database is refreshed every three or four weeks to incorporate the data school districts have uploaded.

Non-public schools (private and charter) can upload data to the MARSS system but are not required to. Non-public schools report summary totals of students approved for F/RP meals to calculate compensatory aid but not individual student data, so MDE has data on the number of children who are eligible but no easy way to reach out to those who didn't apply. Only 1,800 non-public school children applied for P-EBT when more than 13,000 non-public school children are approved for F/RP school meals.

Student data required "cleaning" in Minnesota as it did in other states, as well as formatting outside of the MARSS database, before DHS could use it for data matching. A lot of work and time went into managing and matching data.

> "I'm proud of the work Minnesota accomplished in the timeframe and conditions that we were working in."
>
> – SNAP official

Systems and Contracts

DHS's eligibility system is a legacy system, which posed significant constraints, and limited what DHS could achieve through automation. It would have taken longer to change the current eligibility system to accommodate P-EBT than the proposed implementation period would allow, so DHS issued benefits outside the eligibility system. There was no system interoperability between MARSS and DHS's eligibility system, so MDE staff exported lists of students approved for F/RP meals from the MARSS system and formatted the list so that it could be used by DHS.

DHS also relied on public press releases instead of direct notices because their eligibility system would have taken too long to implement notices. DHS had to set up a code to differentiate different kinds of benefits, which led to eligibility system vendor costs. Case notes for front line workers were available for situations in which SNAP households called asking about the extra benefit.

Minnesota's EBT card vendor is FIS. New EBT cards were "P-EBT specific" meaning they were on white card stock. Managing the card stock as well as other processes were difficult, but DHS saw it as a learning opportunity. DHS also reports incurring EBT vendor costs to implement P-EBT.

Activating or "pinning" P-EBT cards was done using the recipient's zip code or date of birth. This was a new process for P-EBT to ensure that the minimal amount of information was requested and the program was open to all applicants, as activating EBT cards is typically done using Social Security numbers. Advocates report this could be hard to figure out through FIS's automated system.

> "It would have taken longer to change the current eligibility system to work for P-EBT than we had to implement P-EBT."
>
> – SNAP official

Troubleshooting

DHS established a call center and email inbox as mechanisms families could use for inquiries. DHS used the existing SNAP hotline phone number and had an option tree that routed calls based on the issue being raised. DHS also tapped into a different pilot using jabber software, in which families could call in from their laptop or computer and call center staff could see the queue and identify the caller.

County SNAP agencies were getting calls from families too but were only able to provide status updates to families on SNAP or TANF who were receiving P-EBT benefits through direct issuance.

DHS developed a guidebook to help train staff who volunteered to pick up shifts in the call center in addition to their regular job duties, but even with additional staff support, it was very difficult for call center staff to help families in real time. They were receiving about 3,000 calls a day at the peak of implementation and DHS staff had to look in eligibility systems for SNAP or TANF households, spreadsheets for lists of children approved for F/RP meals, and other resources, to manually work a case.

DHS implemented an automated benefit status option as a way to offer basic information and in the hope of reducing caller wait times, but advocates reported this made it more difficult to get a staff member on the line. After the application closed on July 31, the DHS call center changed their outgoing message to refer callers to two community partners: Hunger Solutions and Second Harvest Heartland. Hunger Solutions' Helpline reported answering 700 calls that week – double a typical month, and more than half were about P-EBT. The majority of calls were families asking about the status of their application or reporting difficulty activating cards.

> **"**
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> "USDA's program integrity expectations were based on the school nutrition program not on SNAP and that led to confusion in implementing the project."
>
> – Child Nutrition official

Outreach and Communication

DHS was not able to issue notices to families due to the limitations of their eligibility system, but they did use a wide variety of outreach techniques, including press releases, social media, multiple languages, and various partnerships with community-based organizations and advocacy groups like Hunger Solutions.

Targeted outreach/communication to families

The Hunger Solutions HelpLine provided application assistance over the phone as a SNAP outreach contractor and received 475 application assistance requests, including interpretation services, which were critical early in implementation before the application was translated into five additional languages. Hunger Solutions also leveraged the data shared by DHS on estimates of eligible children who had yet to receive benefits (as shown in the figure below) to pay for targeted Facebook and radio advertisements by county. Radio advertisements were also conducted in Spanish, which Hunger Solutions reported resulted in an uptick in requests for Spanish application assistance through their HelpLine. The advertisements directed families to the Hunger Solutions website where there was information about the P-EBT program, a link to the application, and the Food HelpLine phone number where they could receive assistance applying. The social media presence both by the SNAP agency and the advocacy organization aimed to foster the word of mouth spread of information across families, particularly in Latino and Somali communities.
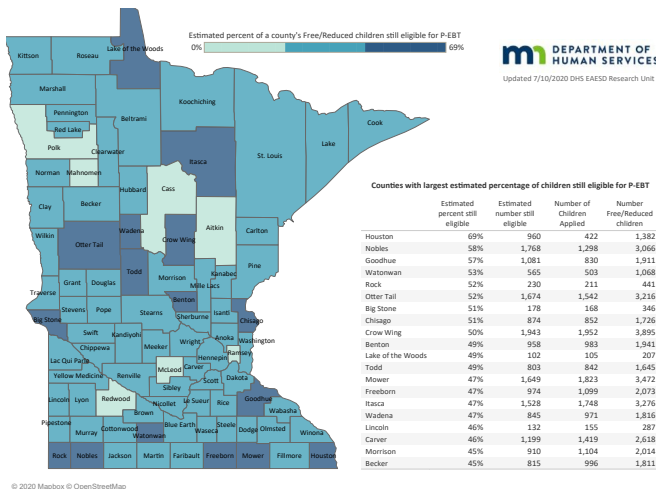
Figure 2: Map of estimated percent of a county's children approved for F/RP meals and still eligible for P-EBT as of July 10, 2020.
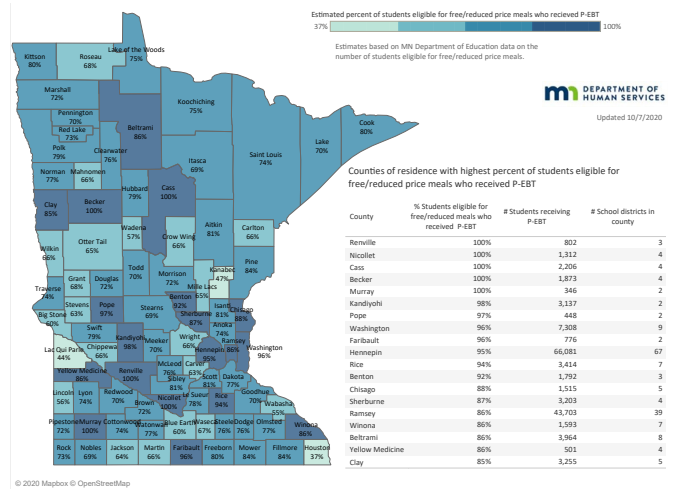
Figure 3: Map of estimated percent of a county's children approved for F/RP meals who received P-EBT as of October 7, 2020.

Application Experience

According to advocates, the application was accessible and easy for families to fill out. After an applicant submitted an application, a confirmation number appeared on screen, which was a useful tool to troubleshoot or request a status update, but many applicants did not keep it. During implementation, DHS improved their approach to troubleshooting by automatically emailing the confirmation number after an application was submitted. Nonetheless, ambiguity about application status remained while data matching and eligibility confirmation was being done, as there were no messages to families who hadn't received P-EBT benefits. As a result, some families went months after applying without being notified that their application was still being processed.

School engagement varied widely by district. Some districts sent emails, texts, and robocalls to families while others didn't conduct any outreach. MDE was also focusing on transitioning schools from NSLP to emergency summer meals and school districts and schools were overwhelmed with facilitating communication with families on meal distribution to address immediate needs, while teaching remotely, addressing internet and technology gaps, and finishing up the school year.

Advocates reported that DHS's traditional media outlets were well utilized and they were more active on Facebook, having been given the autonomy to post without going through the usual channels for approval. Advocates reported Facebook ads worked well and there was a lot of information being shared by word of mouth and families helping families on social media platforms.

Outcomes to Date

DHS reported they had reached two-thirds of eligible children in the initial 6-8 weeks of implementation and 82%, just under 265,000 children overall, based on their final estimate of 327,000 eligible children. DHS provided the following map which provides the final breakdown of P-EBT issuances by county.

Minnesota Pandemic EBT issuances and children served

Updated 10/26/2020

Pandemic EBT, by residential county

	Amount	# Children	# Families		Amount	# Children	# Families
Grand Total	$86,807,500	267,100	133,067	Martin	$317,850	978	499
Aitkin	$233,350	718	353	McLeod	$459,875	1,415	679
Anoka	$5,587,725	17,193	8,597	Meeker	$290,875	895	443
Becker	$611,650	1,882	905	Mille Lacs	$532,350	1,638	788
Beltrami	$1,287,000	3,960	2,091	Morrison	$472,875	1,455	688
Benton	$587,925	1,809	941	Mower	$953,225	2,933	1,462
Big Stone	$68,250	210	106	Murray	$112,450	346	170
Blue Earth	$779,350	2,398	1,143	Nicollet	$427,375	1,315	622
Brown	$318,500	980	483	Nobles	$687,050	2,114	1,032
Carlton	$454,025	1,397	718	Norman	$122,200	376	180
Carver	$544,700	1,676	840	Olmsted	$2,006,225	6,173	2,940
Cass	$719,875	2,215	1,123	Otter Tail	$676,000	2,080	1,015
Chippewa	$223,925	689	343	Pennington	$193,375	595	303
Chisago	$493,025	1,517	749	Pine	$455,000	1,400	699
Clay	$1,068,600	3,288	1,630	Pipestone	$163,475	503	245
Clearwater	$178,425	549	271	Polk	$542,425	1,669	786
Cook	$52,000	160	81	Pope	$144,950	446	237
Cottonwood	$230,750	710	353	Ramsey	$14,223,300	43,764	21,453
Crow Wing	$843,700	2,596	1,294	Red Lake	$69,225	213	97
Dakota	$5,221,125	16,065	8,194	Redwood	$278,200	856	383
Dodge	$234,975	723	344	Renville	$263,900	812	384
Douglas	$402,025	1,237	661	Rice	$1,110,850	3,418	1,627
Faribault	$254,800	784	390	Rock	$104,975	323	175
Fillmore	$198,575	611	313	Roseau	$168,350	518	256
Freeborn	$540,800	1,664	845	Saint Louis	$2,209,350	6,798	3,770
Goodhue	$434,850	1,338	708	Scott	$1,489,475	4,583	2,131
Grant	$101,400	312	151	Sherburne	$1,038,375	3,195	1,520
Hennepin	$21,504,275	66,167	33,613	Sibley	$192,075	591	269
Houston	$168,350	518	268	Stearns	$2,412,800	7,424	3,389
Hubbard	$348,075	1,071	508	Steele	$628,550	1,934	919
Isanti	$519,350	1,598	814	Stevens	$97,825	301	157
Itasca	$736,125	2,265	1,160	Swift	$160,550	494	254
Jackson	$121,225	373	188	Todd	$380,575	1,171	587
Kanabec	$224,900	692	357	Traverse	$67,925	209	96
Kandiyohi	$1,018,875	3,135	1,493	Wabasha	$210,600	648	325
Kittson	$61,750	190	84	Wadena	$341,250	1,050	468
Koochiching	$150,150	462	260	Waseca	$259,025	797	402
Lac Qui Parle	$83,200	256	134	Washington	$2,375,425	7,309	3,669
Lake	$81,250	250	129	Watonwan	$267,800	824	423
Lake of the Woods	$50,375	155	81	Wilkin	$95,225	293	155
Le Sueur	$327,925	1,009	499	Winona	$517,725	1,593	831
Lincoln	$52,650	162	79	Wright	$1,146,275	3,527	1,685
Lyon	$473,200	1,456	713	Yellow Medicine	$162,825	501	244
Mahnomen	$236,925	729	371	Out of state	$19,500	60	41
Marshall	$128,050	394	191				

Issued amount by residential county
$19,500 ▬▬▬▬ $21,504,275

DEPARTMENT OF HUMAN SERVICES

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*Out of State data includes children who may live in other states but attended school in Minnesota during the 2019-2020 school year.
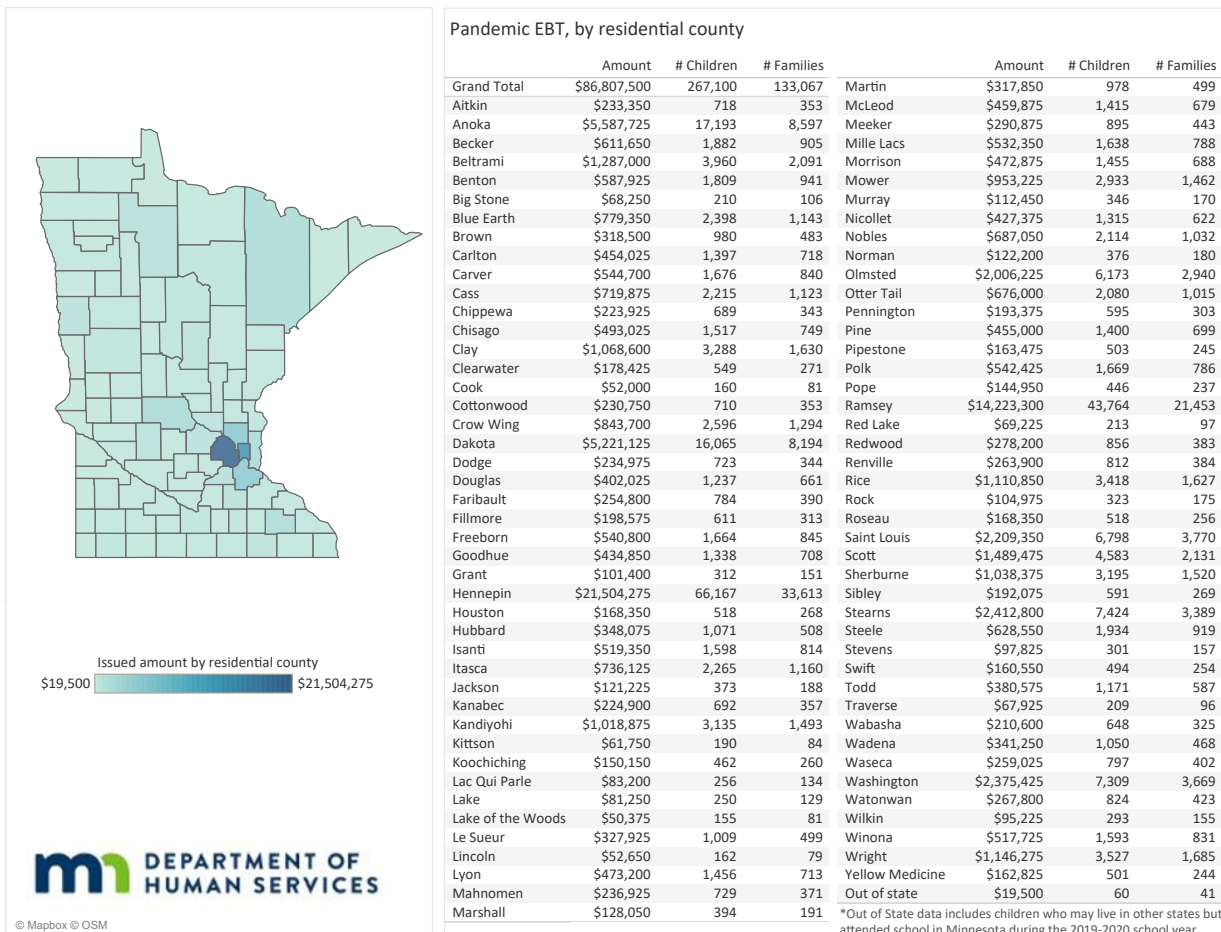
Figure 4: P-EBT issuances by county: number of children served, number of families served, and amount of benefits as of October 26, 2020.

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. DHS and MDE would spend more time learning about each other's programs, data assumptions, and issues with incompatibility of data systems that delayed implementing decisions. A more comprehensive student data approach would also benefit the non-public school students who were missed. "If we knew then what we know now, we would have utilized a different approach to capture non-public school data."

2. Minnesota reported that having a process for families who were newly eligible to apply is important and was a missed opportunity that additional time, resources, and guidance on FNS criteria could allow for.

3. Outreach and communication channels were effective but there remained an opportunity to have a stronger, coordinated communications plan so that outreach and messaging from partnering organizations and school districts were consistent and strategically targeted. The advantage of having more time to collaborate would allow for determining the most efficient roles and responsibilities across state agencies, school districts, and community partners.

> "My biggest hope [is] that if this program continues to exist that there are more flexibilities offered at the federal level for acceptable data matches. This is a true hybrid program, and I found that the expectations, guidance and design did not reflect the uniqueness or the difficulties that exist in a hybrid program such as this- especially considering the unique circumstances that every state agency has."
>
> – SNAP official

Appendix

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

Additional materials including FNS letter of approval, screenshots of the P-EBT application and the online inquiry form, social media communications, and state P-EBT website can be found in the resource library available at https://www.cbpp.org/pandemic-ebt-resource-library.