

September 3, 2021

Meg Snead, Acting Secretary  
Pennsylvania Department of Human Services  
PO Box 2675  
Harrisburg, PA 17105-2675

Noe Ortega, Secretary  
Pennsylvania Department of Education  
333 Market Street  
Harrisburg, PA 17126

Dear Secretary Snead and Secretary Ortega,

As anti-hunger advocates, parents, and concerned Pennsylvanians, we are writing to you about the need to greatly improve Pandemic EBT (P-EBT) implementation and communication for the 2020-21 and 2021-22 school years. Congress quickly created P-EBT at the start of the pandemic to help families cover their food costs during remote learning when their children did not have access to free and reduced-price meals in school. P-EBT has been extended through September 2022 and was expanded to serve younger children (ages 0-5) starting in October 2020.

P-EBT, is a vital program that is available to nearly 1 million Pennsylvania children - it is especially critical for families whose incomes are just high enough to put SNAP out of reach (the eligibility limit for SNAP is 160% of poverty, whereas for school meals it is 185%). While more than 725,000 P-EBT cards have been successfully activated, too many families are falling through the cracks. As students start another school year, tens of thousands of parents are still without access to benefits that were intended to help with food costs *throughout last school year and the spring of 2020*. Many have waited for months just to learn how and where to report that they have not received their P-EBT, and once they do, they have waited even longer for a response about the status of their benefits while they are struggling to adequately feed their family. With unemployment benefits ending for many families in early September and eviction protections disappearing, it is more urgent than ever that families get the nutrition benefits they need.

In Pennsylvania, as in most states, administering P-EBT has been a challenge and requires full cooperation of all entities involved. In order for P-EBT to be successful, both the Department of Human Services and Department of Education must cooperate and share responsibility in ensuring families access this school nutrition program.

**Improve Communication:**

Both departments should seek to improve their communications with each other, with their internal staff, with school districts and charter school operators, and with parents.

As many P-EBT-eligible students also receive Medicaid and SNAP, income maintenance case workers at the Department of Human Services should be empowered with accurate and timely information to answer basic questions about P-EBT and see P-EBT deposits made to SNAP EBT cards. They should be able to look up basic information and help parents submit inquiries about their P-EBT cases to P-EBT workers. School staff too should be provided timely and clear information about P-EBT and the issuance process and timeline so that they can share it with families, as well as direct them to where they can get help.

This coming school year, while we hope that all schools can operate fully in-person, there should be P-EBT contingency plans in place for quarantining or closures. The rapidity with which the Delta variant is infecting children in districts that have opened means this must be done immediately. The PA Department of Education should ensure that school personnel incorporate P-EBT into their contingency plans, are aware of the need to track interruptions to in-person learning and update student mailing addresses and communicate this to parents.

Remote learning and school meal status determine P-EBT eligibility -- information that only schools can provide to the state. We recognize that all schools do not use a uniform data system, and that the initial implementation of P-EBT did not leave time for coordination with schools. However, the last two rounds of P-EBT implementation have shown how critical accurate data collection is and provided opportunity to improve this process. PDE and DHS should work together to make sure schools are given notice about what type of data they may need to provide as soon as it is known. For example, the rules in USDA's recently released guidance on which school year's data can confer P-EBT eligibility for schools providing free meals to all students through Seamless Summer Option differs from the rules for schools using the Free-Reduced Price Application for the 2021/22 school year.

The state should create and routinely update a dedicated P-EBT website. Both PDE and DHS should use their public-facing web pages, social media, and press releases to ensure that families know about P-EBT and who to contact with any questions or problems. If there are delays in issuing benefits, that information should be publicly posted and schools should be required to share this information as well.

Schools have the ability to communicate with parents about nutrition programs through robo-calls, emails, letters, and their own websites. They should be given standard information about P-EBT to post that provides basic updates and refers parents to state communication for further details about how benefits will be delivered. It should be made clear that schools should not treat P-EBT separately from other school nutrition programs simply because the food is not directly provided at the school.

Lastly, all forms, websites, materials, and the online portal and/or call lines where parents turn for help should be made available in as many languages as possible.

#### **Prioritize staffing and data systems development for P-EBT:**

Thankfully, when P-EBT was extended beyond spring of 2020, Congress allotted 100% federal funding for its administrative costs. Yet we have not seen that translate into adequate staffing or systems development in Pennsylvania. This has been a tremendous disappointment, particularly when compared to states that quickly established live call centers and communication plans and materials, often by contracting with outside entities due to the heavy burdens put upon state staff who were navigating ongoing changes to other federal programs in response to the pandemic.

Schools should be supported in their role in administering P-EBT. Tracking the amount of time spent and cost incurred to collect and submit eligibility information, process school meals applications, confirm in-person or virtual attendance, and communicate to parents is difficult and burdensome. The Department of Education should create a streamlined reimbursement for required data collection and recommended communications so that schools can easily report what they've done and receive appropriate funding for the work they have done.

Other states have been able to quickly and more successfully implement P-EBT because their state uses uniform data systems for all school districts. As the uncertainty of the COVID-19 pandemic continues -- and since Congress has approved Summer P-EBT for next summer as well -- we strongly encourage the departments to invest in universal school and P-EBT data systems to streamline administering these benefits. In addition, a thorough review of current direct certification data matching processes and accuracy should be conducted.

Because the Department of Human Services monitors the delivery of benefits, it should staff a live call center to answer families' questions about their P-EBT benefits. However, some system changes should also be made so that DHS staff can accurately answer questions about the status of their benefits. We acknowledge there have been challenges with the EBT vendor (Conduent) that have resulted in delays outside of the department's control. System updates that allow for more complete data sharing are necessary to better administer P-EBT in the future. For example, being able to see when cards were mailed out by the EBT vendor would be helpful in improving customer support for parents.

Similarly, the system for receiving parent inquiries must be dramatically improved. As an example, if a parent submits an inquiry online, they should automatically receive an email confirmation, not wait for days for a confirmation that is delayed because of the need for a worker to review the message. Some parents have submitted an online inquiry and received no confirmation several weeks after submission, as a result, they submit additional inquiries until they receive a response. This has exacerbated the backlog of inquiries that is bogging down the state's cumbersome and inadequate response system.

The most urgent current need is for DHS to increase its capacity for immediately resolving this large backlog of parent inquiries for the 2020-21 school year. If thousands of inquiries from the previous two school years remain unresolved, staff will be unable to focus on administering P-EBT benefits for this coming school year, causing additional delays, frustrations, and inadequate food for students who need nutritional support in order to learn.

We would like to meet to discuss our concerns further. Thank you for your time and consideration,

Ann Sanders  
Public Policy Advocate, Just Harvest  
[anns@justharvest.org](mailto:anns@justharvest.org)  
(C) 412-965-9960

Kathy Fisher  
Policy Director, Coalition Against Hunger  
[kfisher@hungercoalition.org](mailto:kfisher@hungercoalition.org)  
(C) 215-876-5435

*Undersigned organizations*

AHN Healthy Food Center  
Tori Vallana, RD, LDN

Allies for Children  
Laura Stephany, Health Policy Manager

Chester County Food Bank  
Janet Zeis, Director of Agency Relations &  
Distribution

Coalition for Low Income Pennsylvanians  
Kathleen Daugherty, Administrative Coord.

Community Food Warehouse of Mercer  
Rebecca Page, Executive Director

Feast of Justice  
Rev. Patricia Neale, Executive Director

Food Connect  
Megha Kulshreshtha, Executive Director

Greater Pittsburgh Community Food Bank  
Dennis McManus, Government Affairs Director

Honey Brook Food Pantry  
Becky Zeeger, Director of Operations

Indiana County Community. Action Program  
Michelle Faught, Executive Director

Montgomery County Community Action  
Development Commission  
Rick Beaton, Executive Director

Nutritional Development Services  
Lizanne F. Hagedorn, Director

Pennsylvania Council of Churches  
Rev. Sandra L. Strauss, Director of Advocacy &  
Ecumenical Outreach

Pittsburgh Food Policy Council  
Dawn Plummer, Executive Director

Pittsburghers for Public Transit  
Laura Chu Wiens, Executive Director

Children First  
Donna Cooper, Executive Director

Community Action Association of Pennsylvania  
Daniel C Leppo, Acting CEO

Community Legal Services of Philadelphia  
Louise Hayes, Supervising Attorney

Feed the Hood PA  
Chef Carlos A. Thomas, Director

Food For Families  
Thomas Lehman, Manager

HELP: MLP - The Health, Education, and Legal  
Assistance Project: A Medical Legal Partnership at  
Widener University  
Rachel Mark, Staff Attorney

Hunger Free PA - PA Food Banks  
Sheila Christopher, Executive Director

Jewish Family and Children's Service of Greater  
Philadelphia  
David Rosenberg, Senior Vice President

Nationalities Service Center  
Margaret O'Sullivan, Executive Director

Office of Community Empowerment and  
Opportunity, City of Philadelphia  
Beth McConnell, Director of Policy

Philabundance  
Loree D. Jones, Chief Executive Officer

Pittsburgh United  
Daniel Davis, Economic Justice Organizer

Share Food Program  
Car Bartoli, National School Lunch Program Director

Southern Chester County Opportunity Network  
(SCCON)  
Kate Daneker, Director of Social Initiatives

The Food Trust  
Mark Edwards, CEO

The Foundation for Delaware County  
Frances M. Sheehan, President

United Way of Bucks County  
Timothy Philpot, Director of Financial Stability and  
Health

West Chester Food Cupboard  
Fiona Allison , Board Member

Westmoreland Food Bank  
Jennifer Miller, Chief Executive Officer

YMCA of Greater Pittsburgh  
Jose A. Diaz, MSW, Senior Director, Community  
Outreach and Impact