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EMPLOYEES' RETIREMENT SYSTEM  
HAWAII EMPLOYER UNION HEALTH BENEFITS TRUST FUND  
OFFICE OF THE PUBLIC DEFENDER

**STATE OF HAWAII**  
**DEPARTMENT OF BUDGET AND FINANCE**  
P.O. BOX 150  
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE  
BUDGET, PROGRAM PLANNING AND  
MANAGEMENT DIVISION  
FINANCIAL ADMINISTRATION DIVISION  
OFFICE OF FEDERAL AWARDS MANAGEMENT (OFAM)

May 26, 2020

The Honorable Donovan M. Dela Cruz  
The Honorable Jarrett Keohokalole  
The Honorable Michelle N. Kidani  
The Honorable Donna Mercado Kim  
The Honorable Sharon Moriwaki  
The Honorable Kurt Fevella

This is in response to your May 21, 2020 inquiry on State funding to help those who are unemployed due to COVID-19.

The Department of Human Services (DHS) has various existing programs to assist clients in need (food, shelter, rent, child care, employment support, work training, rent supplement, homeless assistance, energy assistance and health care). However, to receive any of these services/benefits, applicants must meet income and other eligibility criteria – not just be unemployed. The following are benefits that may be applied for:

- Temporary Assistance for Needy Families (TANF) and Temporary Assistance for Other Needy Families (TAONF) – TANF and TAONF provide monthly cash benefits to families for food, clothing, shelter, and other essentials. TANF and TAONF are the time-limited welfare reform programs for adults with children. These programs are designed to protect those who cannot work and to require those who are able to work to do so. Other than the funding sources, the TANF/TAONF programs are identical.
- Employment and Training (E&T) – The E&T program is a statewide work program designed to assist able-bodied adults to become attached to the workforce. E&T serves Supplemental Nutrition Assistance Program (SNAP) recipients and puts emphasis on: employment, work experience, training, on-the-job training, and limited job search activities. E&T also provides supportive services in the form of a participant reimbursement to cover work-related expenses and child care.
- General Assistance – The General Assistance program provides cash benefits for food, clothing, shelter, and other essentials to adults ages 18 through 64, without minor dependents, who are temporarily disabled and who do not qualify for Social Security (SS). To be eligible, the adult must have little or no income, not qualify for a federal category of assistance, and be certified by a DHS medical board to be unable to engage in any substantial employment of at least 30 hours per week for a period of at least 60 days.

- Assistance to the Aged, Blind and Disabled (AABD) – The AABD program provides cash benefits for food, clothing, shelter, and other essentials to a gap group of Hawai'i residents. They are elderly adults (65 years of age or older) or individuals who meet the SS Administration definition of disabled or blind. Most are not eligible for federal SS benefits.
- SNAP – The SNAP program provides crucial food and nutritional support to qualifying low-income and needy households, and those making the transition from welfare to self-sufficiency. SNAP is a federal program funded through the U.S. Department of Agriculture and administered at the federal level through its Food and Nutrition Service.
- Low Income Home Energy Assistance Program – Provides heating and/or cooling assistance to needy Hawai'i households by assisting with a one-time payment towards their utility bill (electric or gas).
- Health Insurance and Long-Term Care for Low-Income Adults and Families – The Med-Quest Division provides eligible low-income adults and children access to health and medical coverage through managed care plans.
- Rent Supplement Program – The rental supplements help eligible families pay for part of their monthly rent. Families must pay at least 30% of their adjusted family income for rent. The difference between the family contributing rent payment and the total monthly rent, up to a maximum of \$230.00 per month, is paid directly to the owner by the Hawai'i Public Housing Authority.
- Section 8 Housing Choice Voucher Program (waiting list is currently closed) – The housing choice voucher program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. A housing subsidy is paid to the landlord directly on behalf of the participating family and the family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Under certain circumstances, if authorized, a family may use its voucher to purchase a modest home.

Attached are two documents provided by DHS that detail the following: 1) a breakdown of the amounts of additional federal funds expected to be received, funds received and the balance of funds to be received; and 2) the State's plan for pandemic electronic benefits transfer implementation (submitted May 20, 2020, for federal approval). Please note that funds referenced in these two documents are in addition to any funding received through the CARES Act.

The Department of Labor and Industrial Relations' (DLIR) Office of Community Services has received the following federal funding to address COVID-19 needs:

- The Family First Act (\$1,136,000) – \$880,000 for food purchases and \$256,000 for administrative costs.
- CARES Act (\$1,278,000) – \$849,000 initial amount allocated for food purchases and \$429,000 for administrative costs.

However, it should be noted that DLIR has not received any funds for individual relief.

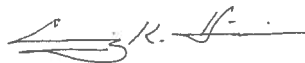
Additionally, the Governor is requiring that the Neighbor Island counties use their CARES Act Coronavirus Relief Fund (CRF) allocations as follows:

1. Payroll and other current expenses for public safety (police, fire, and emergency medical services), public health, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency;
2. Expenses to address community needs and priorities in response to the economic impact of the COVID-19 pandemic such as foodbanks, homelessness, childcare, etc.;
3. Expenditures to facilitate compliance with COVID-19-related public health measures; and
4. Economic support for individuals, non-profits, families, and small businesses to alleviate financial adversities as a result of the COVID-19 public health emergency.

Given the highly centralized delivery of public services in Hawai'i at the State level, the Neighbor Island counties should have sufficient CRF allocations to address community needs and provide a degree of economic support for individuals in their respective counties.

Please contact me if you have general questions on this matter. If you have any questions on department-specific benefits, please contact Mr. Pankaj Bhanot, DHS Director, at 586-4999 or email [PBhanot@dhs.hawaii.gov](mailto:PBhanot@dhs.hawaii.gov); or Mr. Scott Murakami, DLIR Director, at 586-8850 or email [Scott.T.Murakami@hawaii.gov](mailto:Scott.T.Murakami@hawaii.gov).

Aloha,



CRAIG K. HIRAI  
Director of Finance

#### Attachments

- c: Pankaj Bhanot, Director  
Scott T. Murakami, Director

CARES Act Funds												
Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 (To be Submitted by Program, in Review by BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS220	Public Housing Operating Fund Grant from CARES Act	Supplemental operating	14.85	\$ 4,128,858.00	\$ 4,128,858.00	\$ -	N	N/A	S-20-220-K	N	N/A	The funds are not deposited in State Treasury (due to legal exemption) but are reported directly to B&F and DAGS by HPHA, with expenditures done in accordance with HUD rules.
HMS222	CY 2020 Housing Choice Vouchers - CARES Act Administrative Fees, Mainstream Administrative Fees, and MTW Embedded Fees	Administrative fees	14.871	\$ 560,130.00	\$ 560,130.00	\$ -	N	N/A	S-20-219-K	N	N/A	The funds are not deposited in State Treasury (due to legal exemption) but are reported directly to B&F and DAGS by HPHA, with expenditures done in accordance with HUD rules.

CARES Act Funds												
Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 Submitted by Program, In Review by BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS 301	Family Violence Prevention and Services Program; Grants for Battered Women's Shelters, Grants to States and Indian Tribes	The Coronavirus Aid Relief and Economic Security (CARES) Act, P.L. 116-136 provides \$45 million in one-time funding in fiscal year (FY) 2020 to supplement the Family Violence Prevention and Services Act state domestic violence coalitions to prevent, prepare, and respond to the coronavirus (COVID-19) public health emergency. State domestic violence coalitions provide education, support, and technical assistance to domestic violence services for victims of domestic violence and their dependents; and to serve as an information clearinghouse, primary point of contact, and resource center on domestic violence for the state; and support the development of policies, protocols, and procedures to enhance domestic violence intervention and prevention in the State in relation to the	93.671	\$ 242,000.00	\$ 149,209.00	\$ 92,791.00	Y	No E-1 was submitted yet. The program is still waiting for the notice of award.	S-20-284-K	Y	Pending E1 approval	

CARES Act Funds

Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 Submitted by Review by BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS 301	Stephanie Tubbs Jones Child Welfare Services Program	We did not receive any guidelines yet from the federal government. We are currently following-up with the Administration for Children and Families.	93.645	\$ 189,000.00	\$ -	\$ 189,000.00	Y	E-2 has been submitted for Director's review.	S-20-240-K	Y	Pending E1 approval	
HMS 401	Medical Assistance Program	Medicaid	93.778	\$ 79,000,000.00	\$ 57,117,000.00	\$ 21,883,000.00	N			Y	Approved	The amount received is dependent on the amount expended on eligible costs. Additional federal funds are available due to a temporary 6.2% increase in the federal matching percentage.
HMS 224	Emergency Solutions Grant	ESG funds can be used for a wide range of activities and services performed, including street outreach, creating and operating emergency shelters, providing essential and supportive services, homelessness prevention, rapid re-housing assistance, HMIS, and other administrative costs.	14.231	\$ 3,135,000.00	\$ 1,567,697.00	\$ 1,567,303.00	Y	(Balance will still need E-1)	S-20-216-K	Y	Approved	

CARES Act Funds

Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 (To be Submitted by Program, in Review by BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS 224	Housing Opportunities for Persons with AIDS	Homelessness prevention program designed to provide housing assistance and related supportive services for low-income people living with HIV/AIDS and their families. The program also facilitates community efforts to develop comprehensive strategies to address HIV/AIDS housing need and assists communities to create housing strategies to prevent these individuals from becoming homeless or unstably housed.	14.241	\$ 125,000.00	\$ 39,007.00	\$ 85,993.00	Y (Balance will still need E-1)	Approved	S-20-222-K	Y	Approved	

CARES Act Funds

Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 (To be Submitted by Program, In Review by BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS 302	Child Care Development Block Grant	May be used to provide continued payments and assistance to child care providers in the case of decreased enrollment or closures related to coronavirus, and to assure they are able to remain open or to reopen. Can also be used to provide child care assistance to health care sector employees, emergency responders, sanitation workers, and other workers deemed essential during the response to the coronavirus, without regard to the income eligibility requirements.	93.575	\$ 11,902,000.00	\$ 11,990,147.00	\$ (88,147.00)	Y	Approved	S-20-266-K	Y	Approved	
HMS 206	Low-Income Home Energy Assistance	Supplemental LIHEAP funding to help prevent, prepare for, or respond to home energy needs surrounding the national emergency created by the Coronavirus Disease 2019 (COVID-19)	93.568	\$ 1,859,000.00	\$ 1,190,942.00	\$ 668,058.00	Y	E-2 has been submitted for Director's review.		Y	Pending E2	



CARES Act Funds												
Program ID	Name of Fund	Purpose	CFDA	Amount Expected	Amount Received	Balance to be Received	E1/E2 Required? Y / N	Status of E1/E2 (To be Submitted by Program, in BGT, Pending Gov. Approval, etc.)	Appn Account	A-19 Required? Y / N	Status of A-19 (Pending E1/E2 Approval, etc.)	Comments
HMS 904	Low-income Home Energy Assistance	Cost allocated to HMS 904 if AAO reviews any case that has a LIHEAP assistance connected to it. If there are no cases that has a LIHEAP assistance connected to it then there are no costs allocated to HMS 904.	93.568	\$ 1,487.20	\$	\$ 1,487.20	N	None needed due to excess ceiling.	S-20-524-K	N		
				\$ 101,142,475.20	\$ 76,742,990.00	\$ 24,399,485.20						

## **State Plan for Pandemic EBT (P-EBT)**

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

**1. Type of Request: Initial**

**2. Primary Citation: Families First Coronavirus Response Act**

**3. State: Hawaii**

**4. Proposed Alternative Procedures:**

Hawaii proposes to provide P-EBT benefits to SNAP and non-SNAP households with children who have temporarily lost access to free or reduced-price school meals due to pandemic-related school closures. These households are eligible for P-EBT because they:

- Include an eligible child or children, who if not for the closure of their school during a public health emergency designation and due to concerns about a COVID-19 outbreak, would receive free or reduced-price school meals under the Richard B. Russell National School Lunch Act, as amended, and
- The child's school or district will be (or has been) closed for at least 5 consecutive days during a public health emergency designation and due to concerns about a COVID-19 outbreak.

The household allotment amount will be no less than the value of school meals at the free rate over the course of five (5) school days for each eligible child in the household. The value of the school meals is equal to the Federal reimbursement rate for breakfast and lunch at the free rate, as specified by USDA.

**Verification of P-EBT Eligibility:** Hawaii's Department of Human Services (DHS), the State's SNAP agency, will work with the Hawaii Department of Education (DOE), Child Nutrition Programs (CNP), to obtain a data extract from their Free and Reduced Price Meal Program (FRPM) that contains the names of the children enrolled in FRPM and that are categorized as either direct certified, free, or reduced in relation to their program participation. The data extract will also contain the date that the child is enrolled in FRPM, names of adults or guardians associated to the child, address on file, Student ID number, and the SNAP client and case number IDs for the children that are categorized as directly certified.

Hawaii plans to identify SNAP children attending school by matching the DOE Student Information Systems (SIS) file with the State DHS SNAP file. This file includes both Public and Charter school children. It does not include private school children. A separate letter of communication will be sent to Hawaii's Private School to obtain their SIS data so that those students can be matched with the State DHS SNAP files.

DHS will use this data match with the SNAP eligibility system to identify the SNAP cases that the child participates in (using the SNAP client and case number) and will use this data match to issue out the P-EBT benefits to the household's existing EBT account. Amounts issued to the SNAP case will be per child in the household.

Hawaii DHS will capture all the student information from the DOE SIS for all students attending the CEP schools in the State. All of those students are eligible for P-EBT benefits.

Hawaii is proposing that for non-SNAP children, all available DOE SIS data will be used to attempt to establish a head of household in issuing benefits and the EBT card. In the event that the data is unable to establish a head of household then the benefits and the EBT card will be issued in the name of the child.

Release of Information. Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section."

**Calculation of Household Allotments:**

Public schools in Hawaii closed for Spring Break that effectively started on March 16, 2020 and have not reopened since. Additionally, Hawaii's Superintendent announced that schools would remain closed through the remainder of the current school year with the official last day of school being May 28, 2020.

The number of eligible days for P-EBT benefits for each month breaks down to the following:

March 16-31:	12 days
April 1-30:	22 days
May 1-28:	20 days
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Total possible days:	54 days

It has been determined that the daily reimbursement for free breakfast and lunch in Hawaii is \$6.66 per child. If we multiply this daily amount to the total possible days as mentioned above, the result would be \$359.64. This would be the maximum P-EBT benefit amount a child would be able to receive. DHS will use the FRPM approval date to determine if benefits are to be prorated and will calculate benefits based on the remaining school days from the date of FRPM approval.

Hawaii plans to conduct multiple matching between the DOE SIS and the DHS SNAP system through the pandemic months starting in March. This will allow DHS to capture newly enrolled families into the system. All newly enrolled school age children will be eligible for

P-EBT benefits from the eligibility start date. Hawaii is aware that we are not able to prorate benefits back to the start of the pandemic only to the benefit eligibility date.

Please see number 5 below for estimated projections.

**Issuing P-EBT Benefits to Households:**

For SNAP households Hawaii will use existing case information to issue the benefit. Therefore, the State could provide the P-EBT benefit without contacting a SNAP household.

For non-SNAP households where a head of household can be determined, Hawaii proposes to use the DOE SIS data to generate a mail-out to the households that will serve as their “application” for P-EBT benefits. The mail-out will list the adults/guardians and children that are known at the address per the DOE data, and the adult/guardian who will be initially identified as the P-EBT card payee. Each mailout will have a unique code and phone number for the household. The household will be instructed to call the DHS Interactive Voice Response (IVR) system to do the following:

1. Enter their unique code to confirm receipt of the mail-out.
2. Choose to opt-out of receiving P-EBT benefits if they so desire.
3. Report a change to the P-EBT card payee designation.

The suggested mail-out would be created using the DOE data; and would combine multiple students who have the same address under one mailing address and one household. The purpose of the mail-out is to confirm the DOE information is correct, provide an option to decline the P-EBT benefits, and to identify which adult the P-EBT card should be issued to. The unique code referenced to this mail-out is to assign the mail-out to a specific household, and in turn the specific child(ren). This unique code will allow us to be able to identify which households responded and which did not, as well as confirming the mail-out recipient to the information we have from the DOE.

Mail-out confirmations and changes will be captured from the IVR to DHS’s copy of the data match. This information will be used to create the transmission file to our EBT vendor, Fidelity Information Services (FIS). FIS will mail-out the P-EBT card to the non-SNAP households.

If we are not able to establish a head of household for non-SNAP households with the available data, but have the data needed to establish an EBT account for the child, Hawaii proposes to issue a P-EBT card in the child’s name using the child’s address per the DOE SIS data and will be mailed out by FIS.

In all situations regarding the non-SNAP households, the P-EBT cards will require card activation prior to usage.

**Other Requirements:**

All P-EBT benefits will be delivered on an EBT card. Hawaii hereby confirms that it has sufficient card stock on hand to successfully begin operations for the number of households estimated below.

Hawaii will include the following Civil Rights statement on all flyers and documents related to the P-EBT in compliance with Civil Rights laws: : *“Hawaii will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.”*

A media release will be sent to local outlets (newspaper, TV and Radio), School Principal Twitter, State Twitter, Mayor's Twitter, State or Island Facebook or Instagram pages to notify families that they can contact DHS via an email address that would be created specifically for this program if they believe they were missing. Information could be requested thereafter and then used to search against the P-EBT database to verify if the household or child was eligible and missed.

Hawaii’s SNAP agency also agrees to complete the FNS-292 form on a timely basis in accordance with requirements as well as all other normally recurring SNAP reporting included the FNS 46 and 388 reports, on a timely basis in accordance with requirements.

In addition, Hawaii will submit a report to FNS with the following information for the entire State:

- The value of the P-EBT benefits issued to SNAP and non-SNAP households, separately identified.
  - Within SNAP households, the data must differentiate between base SNAP benefits and P-EBT benefits
- The average P-EBT issuance amount per household for SNAP and non- SNAP households, separately identified.
- The number of SNAP households issued P-EBT and the number of non- SNAP households issued P-EBT

**5. Justification for Request: Coronavirus COVID-19**

**Affected Caseload:**

One month estimates for existing SNAP households under these procedures:

- Number of households receiving P-EBT benefits: 24,025
- Number of children receiving P-EBT benefits: 46,740
- Amount of P-EBT benefits to be issued: \$16,809,573.60

One month estimates for those non-SNAP households/children who will receive P- EBT under these procedures:

One month estimates for those non-SNAP households/children who will receive P- EBT under these procedures:

- Number of households receiving P-EBT benefits: 20,147
- Number of children receiving P-EBT benefits: 34,857
- Amount of P-EBT benefits to be issued: \$12,535,971.48

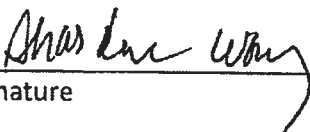
**6. Anticipated Implementation Date:**

- P-EBT Public notice campaign begins 7 days after approval.
- EBT system changes completed 10 days after public notice campaign begins.
- EBT cards mailed to non-SNAP households 15 days after EBT system changes.
- Benefits issued to SNAP clients: March – 6/24, April – 7/8, May - 7/22
- Benefits issued to Non-SNAP clients: March – 7/1, April – 7/15, May – 7/29

**7. Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:**

  
\_\_\_\_\_  
Signature

Scott Nakasone, Assistant Division Administrator  
\_\_\_\_\_  
Print Name and Title

  
\_\_\_\_\_  
Signature

Sharlene Wong, SNS, Program Administrator HCNP  
\_\_\_\_\_  
Print Name and Title

**8. Date of Request: May 20, 2020**