

**State Plan for Pandemic EBT  
Children in School and Child Care, 2021-2022**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

***Additional context and background for this document can be found at:  
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>***

*The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660*

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2021-2022**

1. **State:** Utah

2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);  
Continuing Appropriations Act, 2021 and Other Extensions Act;  
Consolidated Appropriations Act, 2021;  
American Rescue Plan Act of 2021

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*<sup>1</sup> covered by this initial plan (or subsequent amendment).

a. The *date range* covered by this State plan or amendment

**The state of Utah would like to request date range coverage from September 1, 2021 through May 31, 2022.**

b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.

**The state of Utah estimates the total amount of P-EBT benefits for school-age children will be \$11,080,544 and a monthly amount of \$1,231,171.55.**

- Estimated amount issued to school children in SNAP households.

**Utah estimates the following total and monthly amounts for SNAP households; \$4,618,692 total and \$513,188 monthly.**

- Estimated amount issued to school children in non-SNAP households

**Utah estimates the following total and monthly amounts for non-SNAP households; \$6,461,852 total and \$717,983.55 monthly.**

- Estimated amount issued to non-school children in child care

**Utah estimates the total amount of non-school children in care benefits is \$497,213.**

c. Estimated total *number* of children to which the State will issue P-EBT benefits.

**The state of Utah estimates the total number of children it will issue P-EBT benefits to is 163,067.**

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

- Estimated number of school children in SNAP households  
**65,052 children (4785 households) will be SNAP households**
- Estimated number of school children in non-SNAP households  
**91,012 children (12,302 households) will be non-SNAP households.**
- Estimated number of non-school children in child care

**The state of Utah estimates they will issue benefits to 7,003 children in child care.**

- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households
  - School children in non-SNAP households
  - Children in child care

Response:

**Utah will issue P-EBT benefits to all children in SNAP and non-SNAP households as well as school, using the following tentative schedule. Utah plans to issue them in 4 separate blocks.**

- **Block one will cover the months of September through February 2022 and will be issued at the end of May 2022.**
- **Block two will cover the months of March and April 2022 and will be issued at the end of June 2022.**
- **Block three will cover May through June 2022 and will be issued at the end of July 2022.**
- **Block four will be our final issuance as a catch-all in the month of October 2022. This will identify any remaining students that may have been missed in the first three issuances.**

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:  
 directly certified or determined “other source categorically eligible” for SY 2021-2022, *or*  
 certified through submission of a household application processed by the child’s school district for SY 2021-2022, *or*  
 enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3,

*or*

on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application *and* the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.

The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

#### 4. P-EBT for School Children (see Q&As #6-24)

##### A. Eligible Children

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. *(Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.)*

**Local Education Authorities process and submit data to USBE which identifies eligible students and confirms their P-EBT eligibility through the free and reduced-price data for applications and direct certification received in the school year 2021-2022. Local Education Authorities (LEAs), including public school districts, public charter schools, private schools, Residential Child Care Institutions, and Bureau of Indian Education entities, participating in the school meal programs, determine school meal eligibility each month that P-EBT benefits will be issued.**

**LEAs have provided communication and various means for households to apply for free or reduced-price meal benefits for the current school year. The LEA verifies and certifies the student's free and reduced-price lunch eligibility through the household application and direct certification process. The SFA uses the USDA FNS issued Income Eligibility Guidelines established for SY 2021-2022. Free and reduced-price student meal eligibility is updated in the School Food Authority (SFAs) software throughout the year. School districts attempted to reset free and reduced-price school meal eligibility for all students at the start of the 2021-2022 school year. The state's school districts will rely on SY 2021-2022 free and reduced-price lists to identify children who may be eligible for P-EBT benefits. School districts are collecting applications from new students, transfer students, and returning students who may have become newly income-eligible for free or reduced-price school meals. SFAs continue to make free and reduced-price meal applications available to households throughout the school year.**

**The state will assume free and reduced-price meal eligibility back to September 1, 2021 for children whose parents do not submit household applications for free or reduced-price meal eligibility until after the state announces its P-EBT plan for the current school year.**

**Each LEA will provide lists of enrolled students for the 2021-2022 school year who are eligible for free or reduced-price meals by eligibility date, receiving SNAP benefits, or are enrolled in Provision 2 or Community Eligibility Provision (CEP). LEA files will also include parent/guardian names and mailing addresses. The state CNP office will instruct SFAs to only submit free and reduced-price eligibility for students enrolled in an NSLP approved school, exclude students that have graduated, and exclude any students that had 30-day carryover from the 2021-2022 school year. Students enrolled in online-only schools operated by an LEA will not be eligible for P-EBT as these schools are not approved to participate in NSLP.**

**Students that receive remote learning from an NSLP brick and mortar school due to COVID-19 will be eligible for P-EBT after the school meets the required criteria.**

**The state Child Nutrition Programs will be collecting data from schools that have a temporary building closure during the year. The (temporary school) closure would need to be for at least 5 consecutive days to meet the school eligibility criteria. An additional criterion is that students would not have access to in-school meals during the closure. We would collect a list of free/reduced-price eligible students and issue P-EBT benefits for the days the school was closed. This collection will be from schools with closures in any given month. Data will also be collected from NSLP eligible charter schools that provided a virtual learning option to students in school year 2021-2022 due to COVID-19. The fully virtual charter school students will not be required to complete the application/reconsideration process.**

**In school year 2021-2022, if even one student has to isolate or quarantine at home for 5 consecutive days, or if even one student is approved for full-time virtual instruction, then the school is operating at reduced attendance for 5 consecutive days and the school has met the requirement.**

- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals<sup>2</sup>? Please describe separately for SNAP-recipient and non-SNAP- recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.

**USBE Child Nutrition Programs will request complete and accurate data, from the LEAs, of all enrolled students eligible for free or reduced-price meals or enrolled in Provision 2 or CEP school for the current school year. CNP will review the data submissions from the LEAs and conduct any follow-up on incomplete or questionable files. This data will then be shared with DWS. DWS will run the file against all open SNAP households to be able to identify P-EBT SNAP households from P-EBT non-SNAP households.**

- How will the State confirm each child's lack of access to meals at school? Please describe separately for children in public and non-public schools.

**USBE will collect student data only from schools that go into a temporary closure where students do not have access to in-school meals.**

- Describe the process that the State will use to update and re-establish each child's in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).

**USBE will collect student data from schools with temporary closures (soft closures) monthly and provide this data to DWS.**

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<sup>2</sup> The burden associated with National School Lunch Program applications is covered under OMB Control # 0584- 0026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

**LEA will establish individual eligibility through an application process. The parent will apply with an application for their student's COVID related absences. Individual eligibility will exclude any dates schools were closed as a result of temporary closures. Students may be eligible to receive individual benefits and school closure benefit amounts in the same month. Students will receive either the school closure amount or the individual amount but not both for the same dates. Instructions will be provided to LEA's as part of the individual application for two types of parent reconsideration claims. First, for parents whose children attend schools that are tracking COVID and non-COVID absences; the LEA's will confirm the count of eligible COVID-related absences and virtual learning days. Second, for parents whose children attend schools that are not tracking COVID and non-COVID absences; the LEA's will be instructed to confirm that absences were recorded as excused before submitting a file to the state. Schools will be provided instructions on both methods. It is expected that most schools will use the second reporting method.**

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

**LEAs are responsible for processing free or reduced-price student meal eligibility and matching students with direct certification benefits, including SNAP. Some schools are collecting information on student absences due to COVID-19. LEAs or schools have information on student enrollment and learning models.**

**USBE Child Nutrition Programs will request local level data from the LEAs. The Child Nutrition Programs will maintain all student eligibility data confirming eligibility, provide data scrubbing. The Child Nutrition Programs will coordinate with Data and Statistics to request and track school closures.**

**The Utah State Board of Education has an Interagency Data Sharing Agreement in place with the Department of Workforce Services through September 30, 2022. DWS and CNP will track time and effort spent on state-level activities tied to Pandemic EBT Administrative Costs.**

**DWS will receive all eligibility data from USBE, confirm SNAP versus non-SNAP households, coordinate with contracted DWS EBT vendor, provide issuance of P-EBT benefits/notices/instructions, and coordinate customer service phone calls and emails regarding address changes for P-EBT recipients.**

**DWS, USBE, and LEAs will work together to resolve any disputes made by households.**

- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

### **State Laws Affecting SY 2021-2022**

State laws were passed by the Utah legislation that impacts SY 2021-2022. Senate Bill 107 reads, “All schools in Utah are required to have at least 4 days of in-person instruction per week.” Local health departments will determine when to implement Test to Stay (Utah Department of Health, News, September 14, 2021). Test to Stay is designed to take action to prevent disruptions to in-classroom learning.

Utah code 53G-9-210(2) requires LEAs to offer in-person instruction, initiate a test to stay program when a school reaches the case threshold, and provide a remote learning option for students who do not wish to attend in person.

### **School Eligibility**

Schools must be brick and mortar NSLP participating schools to determine eligibility for P-EBT. Virtual only schools are not eligible for P-EBT. Utah understands a school meets the 5 consecutive day requirement if any student in the school is approved for virtual instruction or has to isolate or quarantine at home for at least 5 consecutive days due to COVID.

### **Available Student Data**

Utah will request data on student free and reduced-price eligibility and school closures from the LEAs. Parent application data qualifying students for P-EBT benefits will also be supplied by the LEAs.

### **Reduction in Households Applying for Free or Reduced-price Meal Benefits**

Due to the implementation of the Seamless Summer Option program (SSO) USDA waiver #85 for SY 2021-2022, many families eligible for free/reduced meals have not applied at the beginning of the school year. School Foodservice Authorities (SFAs) have matched students for free and reduced-price meal benefits through direct certification and meal application process. SFAs have completed verification activities to ensure benefits are correctly determined. The state Child Nutrition Programs will request free and reduced-price eligibility dates from the LEAs.

Students determined eligible for free or reduced-price meals beginning July 1, 2021, through May 30, 2022, for SY 2021-2022 may qualify for P-EBT benefits for SY 2022.

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.

School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).

The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also, describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.

**USBE will collect school closure information bi-monthly and provide this data to DWS.**

- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?

**USBE will collect school closure information bi-monthly and provide this data to DWS.**

- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)

**This information will be collected by USBE from the LEAs. It will be collected at least bi-monthly and provided to DWS.**

- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.

**School closure data will be collected by USBE from the LEAs. Data will be collected at least bi-monthly and provided to DWS. The data will request the total number of days by eligible month the schools had unanticipated closures due to COVID. Benefit level determination will be adjusted as necessary. We will be issuing virtual level benefits to the eligible students for the number of days the school was closed each month due to COVID.**

- Describe any simplifying assumptions the State proposes to use and the justification



for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

## 5. P-EBT for Children in Child Care (see Q&As #25-33)

### *Standard for P-EBT Eligibility*

A child enrolled in a covered child care facility is eligible for P-EBT if:

The child is a member of a household that is enrolled in SNAP in the benefit month.

The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)

During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

DWS will work closely with the Office of Child Care (OCC) and the Child Adult Care Food Program (CACFP). OCC is the agency that licenses all child care centers in Utah which would include Friend, Family, Neighbor providers. OCC has tracked closures of child care provider facilities due to the COVID pandemic since September 2021. They will provide the state of Utah with the closure information. Each facility can report either a partial or full closure. A partial closure would occur when one or more rooms of a larger facility were closed but not the whole facility. The state of Utah will use the facility closure information and compare that to our SNAP recipients that are using that child care facility. Data is collected monthly, on both closures and attendance. The state will make a simplifying assumption that all children in care in a household attending a facility that had one child impacted by the closure of any kind, partial or full, will have all children in care impacted by the closure and be eligible to receive a payment. The state will also assume that each eligible child will receive a payment for each day the center is closed regardless of the child's full-time or part-time attendance status.

This is the most targeted approach for Utah to issue benefits appropriately as large parts of Utah were not dramatically impacted by a barrier to child care access due to COVID.

- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

DWS is the agency that issues SNAP and child care benefits in Utah. Each month we will review and identify all children 0-5 receiving SNAP benefits from the list of OCC attendance at each facility showing a closure. The closure list will be used to

**determine eligible facilities. The attendance list will be used to verify eligible recipients. We will issue daily amounts for each day the facility was closed.**

- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)

**The state of Utah is using actual facility closure information and enrollment information provided by OCC to determine the benefit amounts.**

- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
  - the child's child care facility is closed or is operating with reduced attendance or hours, or
  - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?

**DWS will work closely with the Office of Child Care (OCC) and the Child Adult Care Food Program (CACFP). OCC has tracked closures of child care provider facilities due to the COVID pandemic. The state will review the information provided by OCC to determine eligibility. As stated above the state will assume that a household with one absent child attending a closed facility will qualify the remainder of the household attending the facility to be eligible for P-EBT benefits for the same days of closure.**

- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?

**No.**

- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

**DWS will receive information from OCC monthly showing actual facility closures. DWS is able to verify actual SNAP enrollment monthly for all children 0-5 during each month of the P-EBT plan. The information gathered to determine P-EBT eligibility will be verified prior to issuance using the actual data as it occurred during the months of the P-EBT plan.**

- Describe how the State will set benefit levels for children once they have

been determined eligible for some level of benefit? (See Q&A #29.)

The state of Utah will use the same framework for the childcare benefit issuance determination and amounts as we did for students. For children in child care under 6, Utah will determine a child's issuance based upon the facility closures and that child's eligibility for SNAP benefits during the month of the closure. The P-EBT benefit determination will be made for each child under 6 receiving SNAP during the months of September 2021 – May 2022.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

OCC will provide DWS with a list of facility closures. OCC will also provide DWS with a list of attendance at each facility with a closure. DWS will use the lists to issue P-EBT benefits to SNAP households that have children under the age of 6 that attended those facilities.

- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

The state will make a simplifying assumption that all children in care in a household attending a facility that had one child impacted by the closure of any kind, partial or full, will have all children in care impacted by the closure and be eligible to receive a payment. The state will also assume that each eligible child will receive a payment for each day the center is closed regardless of the child's full-time or part-time attendance status.

## 6. Benefit Levels

### *Standard for Benefit Levels*

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	<b>\$7.10</b>
Alaska	6.03	3.78	1.63	<b>11.44</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	<b>8.28</b>

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

### **Children in Schools**

**The state of Utah will issue benefits to qualified students based on the number of days the eligible school had a soft closure due to COVID. The P-EBT benefit determination will be made based on the block schedule indicated in question 3. For example, if a school is closed for 10 days in a month the student would be issued an amount equal to 10 days multiplied by the daily rate of \$7.10 for a monthly total of \$71.00.**

### **Children in child care under 6**

**The state of Utah will use the same framework for the child in care benefit issuance determination and amounts as we did for students. For children in child care under 6, Utah will determine a child's issuance based upon the facility closure. The P-EBT benefit determination will be made based on the block schedule indicated in question 3 for each child under 6 receiving SNAP during the months of October 2021 – May 2022. Children in care benefits will be issued in blocks 2 and 3.**

## **7. Implementation Timeline, EBT Processing, and Benefit Issuance**

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:

- State Education agency provides student data to SNAP State agency (Day #5)
- P-EBT hotline becomes active (Day #9)
- Public notice campaign begins (Day #10), etc.

**LEAs that are over schools with soft closures will provide student data bi-monthly. USBE will clean the data and prepare the file to send to DWS no later than the last day of the month prior to the month of issuance. DWS will submit the file to the EBT vendor for benefit issuance within two weeks of receiving the student data file.**

#### **Children in child care under 6**

**DWS will identify the eligible P-EBT children in child care under 6 populations. DWS will determine eligibility amounts for each eligible P-EBT child based upon the facility closure report provided by OCC. DWS will issue the P-EBT benefits to eligible children based on the block schedule provided in question 3.**

**For both the student and children in care under 6 P-EBT plans, the state of Utah will develop an implementation timeline in conjunction and with coordination from our EBT processor, Conduent. Utah will develop a communication pathway to provide timelines regarding EBT processing for both plans. Utah will work with our EBT processor to develop specific milestones and checkpoints for card stock, card distribution, and issuance schedules.**

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?

**The state of Utah will issue P-EBT benefits on a unique P-EBT card design for non-SNAP households only. SNAP households will receive their P-EBT benefits on their current SNAP card. Children in child care under 6, who are SNAP recipients, will have their P-EBT benefits issued on their current SNAP card.**

- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.

**The P-EBT benefits are issued with a subprogram code of PEBT.**

- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.

**The drawdown priority will be first in, first out. Since the PEBT funds will be deposited into the SNAP account, there is not a priority determination between PEBT or SNAP. It will simply be FIFO.**

- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.

**The state of Utah will continue to follow the expungement rules it uses for our SNAP cases.**

- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?

**The EBT Processor will status the cards that are returned and these will be reported on the Undeliverable Card report. The State Agency will work the Undeliverable Card report daily to make contact with the customers, update addresses, and mail new cards out. There is also a process in place for issuing OTC cards if needed.**

- Will you issue *new* P-EBT cards to existing P-EBT households?
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

**The State of Utah will issue new cards to all non-SNAP P-EBT households. SNAP households, including households receiving P-EBT with children in care under 6 receiving SNAP, will receive P-EBT benefits on their SNAP EBT card. The customer can contact the EBT Vendor or the State Agency to have a new card issued.**

## 8. Customer Service

### *Recommended Standard for Household Support*

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

USDA strongly encourages States to provide a means to resolve disputes and answer from actual or potential P-EBT households.

USDA strongly encourages States to provide relevant program information to actual and potential P- EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied

benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

**The state of Utah will have a toll-free hotline, (833) 940-2990, for families/households to contact regarding disputes. The personnel staffing the hotline will work toward resolving questions, concerns, and disputes. The hotline personnel will refer unresolved disputes to the appropriate agency for resolution. Disputes on eligibility and benefit amounts for students will be sent to USBE for assignment and resolution by the local LEAs. Disputes on eligibility and benefits amounts for children in child care under the age of 6 will be handled by DWS for resolution. Disputes from individuals not receiving their cards or losing their cards will be handled by the EBT provider contracted with DWS.**

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).

**The state of Utah has an all-around approach to assist with efficiency and providing the best customer services and customer education possible. USBE and DWS will ensure accurate communication to all households. Utah will work with partner agencies, such as Utahns Against Hunger (UAH), to establish our public information campaign. The campaign will be ongoing for the duration of the P-EBT issuances and available on the state's P-EBT website. We will also utilize the schools' communication pathways to ensure that all families/students are notified of the P-EBT program.**

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them, for instance, how to dispose of the card, etc..

**All P-EBT beneficiaries that wish to not participate in the program will be instructed to dispose of the P-EBT card. These benefits will go through the expungement process.**

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:

- A description of P-EBT
- Instructions for PINing a P-EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
- Explanation of violations and penalties, such as trafficking
- An indication that benefits are non-transferable
- Instructions for destroying the card, if they want to decline benefits
- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

**Information will be sent to P-EBT households, through the form of a buck slip, once they are approved for the benefit. The information will include details about the P-EBT program, where to go if they have questions or need assistance, instructions on PINing a card, where benefits can be used, and how they can/can't be used. The information will include details on violations, penalties and that benefits are non-transferable. Instructions for destroying the card and what to do if they want to decline benefits will be provided. A buck slip will also provide information for customers on setting up the PIN.**

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
  - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

**All information will be provided in the same manner for SNAP and non-SNAP households. Information regarding the P-EBT card, how to set up the card for usage, and instructions to use the P-EBT will be given through a buck slip. DWS will also provide information through our website and social media pages.**

**The state will have a reconsideration process in place for households that are not issued P-EBT benefits or would like to be considered for partial or full P-EBT benefits. Individual student eligibility will utilize a parent application through their LEA. USBE will provide a list of qualifying schools to DWS.**

**OCC will provide a list of qualifying child care provider facilities to DWS.**

**Households may contact the toll-free number as a first step. It will be determined if the student(s) in the household was enrolled in a qualifying school. If the student was enrolled in a qualifying school, DWS and USBE will coordinate to determine if the student's information was provided by the LEA in the student eligibility data**



collection. If the student is not on the eligibility list, USBE will contact the LEA to confirm if the student met the student eligibility criteria. A partial or full P-EBT benefit determination will be made to eligible students in qualifying schools for the months the student was enrolled. Information will be sent to DWS for benefit issuance to the household.

Households with child(ren) 6 and under who had a COVID-related absence outside of a full or partial facility closure may contact the email. DWS will determine if the child was receiving SNAP during the months of the P-EBT plan. If the child was not receiving SNAP, DWS will educate the household. Next, it will be determined if the child is a participant of a child care facility that had a closure or reduced attendance, DWS will research the request and determine P-EBT eligibility. If the child was enrolled in a CACFP eligible child care facility and was not issued a P-EBT benefit, DWS will research the request and determine P-EBT eligibility. Alternatively, if the child enrolled in a CACFP facility had a COVID-related absence outside of a facility closure DWS will research and confirm attendance data with OCC. If the child had an absence on a scheduled attendance day confirmed that was COVID-related, DWS will make a benefit decision. DWS will educate the household on the eligibility decision and if applicable information regarding the P-EBT issuance amount.

#### Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits, under those circumstances, calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your State will manage P-EBT payment errors.

**USBE validates all data and will only provide data for students that qualify for P-EBT based on household application for free or reduced-price meals based on the USDA guidance and regulations. USBE validates all data regarding counties of qualifying school closures. DWS validates all data and will only provide data for children in child care under the age of 6. Utah will make all reasonable efforts to detect improper usage of P-EBT payments. These efforts will include utilizing methods to identify questionable issues related to P-EBT activities. We will utilize these methods to determine if improper activities have occurred with P-EBT funds and when necessary refer cases to USDA for final claims processing.**

**If the benefits are disputed for any reason, assigned staff will research the concerns. Each case/concern will be handled individually. If determined that the original P-EBT benefits were issued incorrectly, Utah will ensure that the child receives the correct amount of entitled P-EBT benefits.**

**Utah will contact USDA prior to taking action when it discovers an over-issuance or improper payment. The contact report will include the error, number of children, and dollar value of the error as well as a recommended plan of action.**

## **9. Benefit Issuance Reporting**

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

## **10. Administrative Funding**

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30, 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter of credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter of credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget

Summary Statement. The forms associated with P-EBT will be modified accordingly.

**11. 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 to administer 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.”

**12. Civil Rights Statement**

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

**13. Administration of State P-EBT Plan**

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

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

*Kathleen Britton* - State Director of Child Nutrition Programs

Signature  
Print Name and Title

 Deputy Director Department of Workforce Services

Signature  
Print Name and Title

**Date of Request** \_\_\_\_\_