

**State Plan for Pandemic EBT
Children in School and Child Care, 2022-2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2022-2023
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Summary:	(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) 2022-2023. (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 State Guidance on Coronavirus P-EBT: [Click Here](#)

The submission of a P-EBT state plan, associated template, and related reporting obligations are addressed in OMB# 0584-0660, Pandemic Electronic Benefit Transfer (P-EBT), expiration 11/30/2023.

State Plan for Pandemic EBT
Children in School and Child Care, 2022-2023

1. State: Arizona

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*¹ covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this state plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the state will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the state will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school 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
- e. Names of state agencies involved in administering this plan.

Response:

The *date range* covered by this state plan or amendment

- Children in childcare are defined by FNS guidance as those who are under 6 on or after August 1, 2022
 - i. August 1, 2022 - May 11, 2023, and born/living during this time receiving SNAP in the month the benefit is being paid for.

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

- Estimated amount issued to non-school children in childcare for 22/23
 - i. **\$5,412,000 monthly** August 2022 through December 2022 (Fall)
 - ii. **\$5,412,000 monthly** January 2023 through April 2023 (Spring)
 - iii. **\$2,706,000 month** of May 1 - May 11, 2023 (Spring)
 - iv. **\$51,414,000 estimated total plan issuance amount**

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

- Estimated number of non-school children in childcare
 - i. **132,000 childcare children**

Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

- Children in childcare

The Childcare Population as described earlier will only be considered in this plan. Issuance will be as follows:

Childcare Only Issuance Schedule

P-EBT benefits for Fall 2022 (August - December 2022) are tentatively scheduled for

- **Mid-March 2023** issuance FALL or sooner after FNS approves the monthly benefit amount calculated by Arizona.

P-EBT benefits for Spring 2022 (January - May 11, 2022) are tentatively scheduled for

- **Late-May 2023** Issuance SPRING or sooner after FNS approves the monthly benefit amount calculated by Arizona.
- **Late August 23** - Corrections if needed and to check for any approved SNAP-eligible Child Care Under 6 who were not approved when the Spring Semester Benefit was issued and the application was submitted on or before May 11, 2023, otherwise program ENDS on September 30, 2023.

¹The 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 2022 through June 2023, for example).

4. P-EBT for School Children (see Q&As#7-25)

A. Eligible Children

Standard for P-EBT Eligibility

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

1. 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:
 - a. directly certified or determined “other source categorically eligible” for SY 2021-2022, *or*
 - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. 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.
2. 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.

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.
- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?² 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- 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.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.

²The 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.

- 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).
- 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. (*Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.*)

Response: [please use as much space as needed]

[This plan is only for Childcare Children for the 2022/2023 school year](#)

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:

1. 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.
2. 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.).
3. 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.
- 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?
- 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.)
- 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.

Response: [please use as much space as needed]

This plan is only for Childcare Children for the 2022/2023 school year and the state will be using CACFP data to identify the childcare population benefit amount

5. P-EBT for Children in Child Care (see Q&As #26-33)

Standard for P-EBT Eligibility

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

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. 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.)
3. 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.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family daycare homes as reported by the state on the FNS-44³. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue

³ The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children's eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- 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 #30)
- 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 those children's eligibility? (See Q&A #32-33). 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?
- 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?
- 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 childcare 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.)

Response:

The following two state agencies are responsible for the administration of P-EBT for children in childcare:

- Arizona Department of Economic Security (AZDES), is responsible for the issuance of P-EBT benefits using Child and Adult Care Food Program (CACFP) data provided by ADE, notices to customers, and customer service.
- Arizona Department of Education (ADE) is responsible for monitoring and collecting Child and Adult Care Food Program (CACFP) data to inform the P-EBT benefit amount and ongoing eligibility.

ADE collects and monitors CACFP meal data served in childcare settings. Programs have 60 days following the end of each month to submit claims for CACFP meals. Arizona proposes using the most current CACFP lunch meal data available and provided to AZDES for childcare centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches to determine both, whether Arizona is able to issue childcare P-EBT benefits that month (i.e. if the 2022/2023 data shows a decrease in the number of meals served compared to the same month in 2019/2020), and also to set the childcare P-EBT benefit amount.

For the benefit amount, Arizona proposes to use the percentage reduction of CACFP lunch data compared to 2019/2020 as the basis of a childcare P-EBT benefit amount. This monthly benefit amount assumes an average 18-day monthly attendance in childcare (180 school days required each school year/10 months) with the exception of May where the monthly attendance days will be set at 9 days due to the PHE ending on May 11, 2023. The state will multiply this percentage reduction in claims by the 18-day monthly attendance figure and the \$8.18 benefit per day to arrive at a monthly P-EBT childcare benefit except for May where the monthly attendance days will be set at 9 days due to the PHE ending on May 11, 2023, and the P-EBT childcare benefit amount will be reduced by fifty percent. Arizona will do two issuance cycles again, as done in the prior P-EBT State Plan, Fall (August 2022-December 2022) and Spring (January 2023 - May 11, 2023). The monthly benefit for Fall (August-December) will be based on the sum of CACFP lunches served August - November 2019 compared to the sum of CACFP lunches served August - November 2022.

The monthly benefits for Spring (January – May 11, 2023) will be based on the reduction in CACFP lunches for January 2023 and February 2023 compared to the pre-pandemic months of January 2020 and February 2020. The state will use this data to set the benefit in the same manner as described for the Fall semester with the exception of the May 2023 benefit amount as it will be set at fifty percent of the other Spring months due to the PHE ending on May 11, 2023.

Arizona will be using an averaging approach in lieu of waiting for additional months of CACFP data to become available due to the 60-day delay in finalizing the monthly CACFP numbers.

Arizona commits to sharing its CACFP lunch claim data and calculations with USDA prior to both issuances.

As simplifying assumptions, Arizona proposes that for each month that CACFP data shows an overall reduction in the number of meals served in childcare settings, all children in Arizona under 6 years of age as of August 1, 2022, and in a household receiving SNAP benefits during the plan period August 1, 2022, through May 11, 2023, will be eligible for the childcare P-EBT benefit. AZDES will determine and confirm a child's receipt of SNAP benefits in accordance with the relevant SNAP privacy requirements through the use of the state's eligibility system. Children under 6 years of age who did not receive SNAP benefits during the plan period in one or more months or applied and are approved after May 12, 2023, will not be eligible for the childcare P-EBT benefit for that/those month(s).

Finally, the state proposes the reliance on the most recent CACFP data available which shows Arizona continues to experience a reduction in the number of lunches served compared to pre-pandemic numbers in the same month meets the reduced attendance/closure threshold requirement of five consecutive days.

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 2022-2023. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

Notes:

1. Lunch rates include the 8 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
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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.

Response:

Arizona proposes to set a standard monthly P-EBT Childcare benefit for the Fall 2022 semester months once CACFP data becomes available. To determine the benefit level for the Fall semester months, AZDES will be using CACFP lunches claims for August - November 2019 compared to the sum of CACFP lunches served August - November 2022 showing participation is below pre-pandemic levels throughout the Fall semester months (2019 vs. 2022). To determine the benefit level for the Spring semester months, AZDES will be using CACFP lunches claims for January 2023 and February 2023 to compare to the pre-pandemic months of January 2020 and February 2020 and set the benefit in the same manner as described for the Fall semester. The May 2023 benefit amount to be paid in the Spring semester period will be set at fifty percent of the other Spring months due to the PHE ending on May 11, 2023. Arizona commits to inform FNS of any significant changes in expected P-EBT benefits issuance following analysis of child care access and benefit amounts prior to issuance for both semesters.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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 past years, 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.

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?
- 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 P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
- 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.
- 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.
- 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?
- 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?

Response:

The below dates are tentative and contingent upon other factors.

Late February 23 - FNS plan approved/Programming setup

ISSUANCE-Mid March 23 - Mid February 23 Calculate Fall Semester Benefit, provide calculations and supporting data to FNS to review and approve, AZDES completes issuance for Fall Semester 22/23 Child Care Under 6 August-December or earlier if possible

Late May 23- Calculate Spring Semester Benefit, provide calculations and supporting data to FNS to review and approve, AZDES completes issuance for the Spring Semester 22/23 Child Care Under 6 January-May 11, 2023 or earlier if possible

Late August 23 - Corrections if needed and to check for any approved SNAP eligible Child Care Under 6 who were not approved when the Spring Semester Benefit is issued and the application was submitted on or before May 11, 2023, otherwise program ENDS on September 30, 2023

P-EBT Issuance Schedule by Case Last Name (Child Care):

Last name's first letter is	Benefits available
A-B	*15th of the month
C-D	16th of the month
E-F	17th of the month
G-H	18th of the month
I-J	19th of the month
K-L	20th of the month
M-N	21st of the month
O-P	22nd of the month
Q-R	23rd of the month
S-T	24th of the month
U-V	25th of the month
W-X	26th of the month
Y-Z	27th of the month

*Estimated, may need to be sooner or later depending on when 15th falls as processing needs to occur in the middle of the week.

- 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?
 - As was done for the 21-22 school year and summer 2022, all SNAP Under 6 P-EBT eligible children will be issued P-EBT benefits to the SNAP case/ EBT card they were actively receiving SNAP benefits on during a particular month within the covered period.

- 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 P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
 - AZ will continue to use FSPV as the P-EBT issuance subtype code to identify P-EBT issuance – with our simplifying assumptions and tracking we anticipate being able to identify the P-EBT benefits.
- 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.
 - FSPV will be drawn priority 1 followed by SNAP as was done in previous plans where available.
- 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.
 - AZDES will send out a notice of expungement to participants at 90 days of non-use
 - AZDES will expunge based on the SNAP rules at the time of the expungement
- 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?

N/A as benefits are only being issued to SNAP cases
- 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?

N/A as benefits are only being issued to SNAP cases on SNAP EBT cards

- If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?
 - AZDES will issue another card upon request

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.

1. USDA strongly encourages states to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -

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

Response:

- 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.
 - AZDES will send a notification to each receiving household:
 - A description of P-EBT
 - 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
 - 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)
 - Children PEBT is being issued to
 - Expected issuance amount for Fall and Spring
 - AZDES will maintain a PO Box for handling various needed reviews on cases already built:
 - PO BOX 19009 Phoenix, AZ 85005
 - Items that will be considered proof of custody: Judicial decree, court documents, will, enrollment paperwork, affidavit of guardianship
 - AZDES Customer Service Line for PEBT will be available as the state doesn't plan on shutting it down this year due to the timing of finishing Summer 2022 and implementing this plan.

- AZDES Call Center will be instructed to refer general disputes or issuance errors to CLU (Client Liaison Unit) or Level 2 P-EBT support team for remediation
 - Ability to reissue cards
 - Add/remove children from cases
 - Update date of birth (DOB) or other demographic information
 - Update Primary assigned to case or update Primary Name
 - Research denials
 - Call Backs/Emails to Beneficiaries
 - Research Payment Disputes - Any underpayments will be reviewed and determined by an administrative review completed by The Client Liaison Unit before September 29, 2023.
- If issuance is in error and has been spent, Level 2 support or AZ EBT Team will
 - Record error on OverPayment(OP) worksheet
 - Reissue corrected benefits to a claimant if not the same individual
 - Record OP note in the case with the OP, ONLY once guidance is confirmed from FNS will further actions be taken
- If issuance not spent Level 2 Support or AZ EBT Team:
 - Move to correct case
 - Keep a log of these events for tracking purposes
- Research by CLU team Level 2 Support
 - Administrative reviews that can't be resolved with submitted paperwork
- PRIOR P-EBT years 2019/2020, 2020/2021, Summer 2021, 2021/2022 will be considered closed - any corrections and support will center around the Summer 2022, 2022/2023 school year forward. The only exceptions will be making address corrections and/or card replacements on cases with balances available.
- 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.
 - AZDES will have a customer service line with Spanish speaking as an option
 - AZDES will address groups with access problems in a variety of ways:
 - Printed materials and alternative formats will be available
 - Informational website will be mobile-friendly to support clients with phones
 - Existing TTY services where needed
 - AZDES Client Liaison Unit is specially trained to help clients that may need extra help or can't access traditional methods of contact.
 - AZDES - PEBT runs off the SNAP tender option which operates as a SNAP benefit from a client and retailer perspective. As such

homeless or disabled cases will have access to the Restaurant Meal Program Arizona participates in.

- 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 AZDES will meet with local media to offer program details and build awareness of the program as needed
- AZDES Public Information office will design a mobile-friendly P-EBT informational landing page with a Q&A section
- AZDES PIO will issue press releases and social media releases
- Arizona Food Bank Network will inform clients about the program so they can be on the lookout for the benefits or plan their food budget around the issuances.
- AZDES will reach out to the Arizona Food Marketing Alliance so local retailers are aware of the program

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

- Since only SNAP cases are involved, in the rare instance someone declines the benefit, a recoupment will be made and noted in Case Notes for the case.

- 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)

A notice will be provided to households that addresses these concerns:

- A description of P-EBT
- 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
- Contacting the State 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

Information will be provided via Notice and/or Mass Email-for SNAP when benefits start to issue.

An FAQ and P-EBT landing page will be provided online:
[AZ P-EBT Landing Page](#)

How will you provide P-EBT information to non-SNAP households?

N/A, Childcare-only plan

How will you provide P-EBT information to SNAP households?

Information will be provided via Notice and/or Mass Email-for SNAP when benefits start to issue.

- Will you provide information via mailers? **No**
 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. **Foodbanks may provide their own flyers**
- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means? **Yes, social media and a website**

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.

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.

Response: [please use as much space as needed]

For instances where overpayments occur due to system error or other assignment errors the benefit may be recouped by AZDES for that case if readily available and a standard note recorded in the case about the action taken. If the benefit has been spent, the case may be referred to the AZDES Office of Accounts Receivable and Collections(OARC) after consultation with FNS and AD approval. P-EBT benefits will not be reclaimed or recouped by reducing the household's SNAP benefits. Prior to any referrals for overpayments, AZDES will coordinate with FNS for updated guidance, based on the dollar amount and reason for the overissuance.

AZDES commits to use the standard spreadsheet distributed by USDA that includes columns for the dollar value of the overissuance, the number of children affected, the reason for the overpayment, and a thorough description of the corrective action taken by the state to prevent a recurrence of the problem.

Underpayments: Starting in May 2023, AZDES will begin to accept underpayment claims from SNAP clients to research and resolve for children under 6 not paid or underpaid due to accepted updated information. If the claim is approved and processed, AZDES will issue the difference in a subsequent issuance cycle as a supplemental payment before September 29, 2023. Individual calls or contacts will be handled by the local office/Customer Service line or CLU units.

10. 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.

11. 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, 2022 through September 30, 2023. 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.

12. 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."

13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

14. 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:



Signature

Jeffrey Morley Assistant Director
DIVISION OF BENEFITS & MEDICAL ELIGIBILITY

Date of Request: 2/21/23