



Food and Nutrition
Service

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April 29, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Commonwealth of Northern Mariana Islands' State Plan for
Children in Schools and Child Care

TO: Jesus Mendoza, Jr.
Regional Administrator
Western Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260) authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Commonwealth of Northern Mariana Islands' enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Commonwealth of Northern Mariana Islands Department of Community and Cultural Affairs and the Commonwealth of Northern Mariana Islands Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The State's plan for school children covers the months of August 2020 through June 2021. The State's plan for SNAP-enrolled children in child care covers the months of October 2020 through June 2021.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service through their schools or child care providers.

Children in Schools

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on SY 2019-2020 eligibility data will have a means to address that they do not issue benefits to last year's graduates and non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, the Commonwealth of Northern Mariana Islands has or will:

- issue benefits for the months of August through November in a single distribution beginning in June,
- issue benefits for the months of December through March in July,
- issue benefits for the months of April through June in August,
- group public school students and private school students and assign benefit levels to each group based on schedule data:
 - benefits for children in public schools will be based on the public school system's schedule, which is identical for all public schools,
 - benefits for children in private schools will be determined based on each private school's schedule,
- collect schedule data and learning status from schools for each month:
 - confirmed that all public schools were operating fully virtually from September through January,
- set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.
- use schedule data collected from schools to set or adjust average benefits for children with hybrid schedules; if justified by the data, the state will set a single average benefit for these children, and
- require the parent or guardian to submit an application that collects the names of school children in their household and the name of the institution each child is enrolled in; CNMI will verify the eligibility of each student using school rosters.

Children in Child Care

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the State will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Commonwealth of Northern Mariana Islands will:

- issue benefits for the months of October and November in a single distribution beginning in June,
- issue benefits for the months of December through March in July,
- issue benefits for the months of April through June in August
- for each month from October through the end of the school year, determine if at least one school is closed or offering only distance learning to its students
 - if at least one such school is identified, all NAP-enrolled children under age 6 will receive a full P-EBT benefit in the same amount as the school children attending closed or fully distance learning schools;

- if at least one school offering mixed in-person/distance learning is identified, then all NAP-enrolled children under age 6 will receive partial P-EBT benefit in the same amount as the highest hybrid benefit received by school children during that month, and
- require the parent or guardian to submit an application that collects the names of children under 6 in their household and their NAP status; CNMI will verify the eligibility of each student by confirming NAP receipt.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

Estimated Caseload and Value of P-EBT Benefits

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State's plan.

- Commonwealth of Northern Mariana Islands estimates that it will issue \$11.1 million to approximately 11,600 school children for school closures and reductions in attendance and hours extending from August 2020 through June 2021.
- Commonwealth of Northern Mariana Islands estimates that it will issue \$51 thousand to approximately 50 SNAP-enrolled children in child care from October 2020 through June 2021.

Release of Information

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Commonwealth of Northern Mariana Islands. Section 1101(e) of the Act states, "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."

Plan Timetable and Revisions

Commonwealth of Northern Mariana Islands will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

Civil Rights

The Commonwealth of Northern Mariana Islands will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

Administrative Funds

The Commonwealth of Northern Mariana Islands Department of Community and Cultural Affairs will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State's operational plan evolves.

Reporting

The Commonwealth of Northern Mariana Islands Department of Community and Cultural Affairs will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates the Commonwealth of Northern Mariana Islands' commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs