



Food and Nutrition
Service

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November 3, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of the Commonwealth of Northern Mariana Islands' State Plan
for Children in Schools and Child Care, School Year 2021-2022

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

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, 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 the Commonwealth of Northern Mariana Islands' (CNMI) 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 CNMI's Nutrition Assistance Program (NAP) coupon system to households with eligible children. CNMI's plan covers the months of August 2021 through May 2022.

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 NAP 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. CNMI 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 facilities.

Children in Schools

CNMI 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 eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2020-2021 graduates and other 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, CNMI will:

- issue benefits for the months of August 2021 through May 2022 in two issuances after plan approval:
 - the first issuance is tentatively scheduled for December 10, 2022,
 - the second issuance is tentatively scheduled for March 11, 2023,
- automatically issue benefits for the number of days that students were unable to attend school in-person due to COVID-related schoolwide or classroom-wide closures or schoolwide/classroom-wide virtual learning days:
 - in rare cases, schools have been recording COVID-related reason codes for individual student absences or virtual learning days (other than schoolwide or classroom-wide closures); CNMI will add those days to a child's count of P-EBT eligible days,
- for any other COVID-related absences, parents will have to contact CNMI through its Customer Care Center and fill out a reconsideration form:
 - parents will have to attest that an absences were COVID-related,
 - CNMI will confirm that the absence days claimed by the parent were at least recorded as excused before adding that day to a child's list of P-EBT eligible days.

Children in Child Care

At a minimum, CNMI will identify all children under age 6 who are enrolled in NAP in the benefit month. CNMI will not issue child care benefits to any child for months after their NAP enrollment ends. Finally, CNMI 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, CNMI will:

- identify NAP-enrolled children under age 6,
- issue benefits to children enrolled in structured Day Care Centers for absences recorded as COVID-related by their centers,
- issue an average benefit for children not enrolled in structured Day Care Centers based on the weighted average number of COVID-related closure days reported by structured centers:
 - given that the weighted average number of COVID-related closure days reported by structured centers over the 10 months of the school year was 24, CNMI will issue a 2.4-day benefit to eligible children not enrolled in structured centers ($\$8.28 \times 2.4 = \19.87) for each month that the child was enrolled in NAP,
 - for children enrolled in NAP in all of the months of August through May, the benefit will total \$198.72, or 24 days' worth of benefits,
- issue benefits for the months of August 2021 through May 2022 in two issuances after plan approval:
 - the first issuance is tentatively scheduled for December 10, 2022,
 - the second issuance is tentatively scheduled for March 11, 2023.

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

Estimated Caseload and Value of P-EBT Benefits

CNMI 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.

- CNMI estimates that it will issue \$5.6 million to approximately 11,000 school children for school closures and reductions in attendance and hours extending from August 2021 through May 2022.
- CNMI estimates that it will issue \$0.8 million to approximately 2,600 NAP-enrolled children in child care from August 2021 through May 2022.

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 CNMI. 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

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

Civil Rights

CNMI 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 CNMI's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as CNMI'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 CNMI's exceptional efforts to maintain children's access to nutritious meals, and understands that even as the nation recovers from this difficult time, State agencies and local program operators will still face any number of challenges. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long
Administrator