

**State Plan for Pandemic EBT  
Children in School, Summer 2023**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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<b>Summary:</b>	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children during summer 2023. (2) This document relates to Section 1101 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), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328)

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

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

## State Plan for Pandemic EBT Children in School, Summer 2023<sup>1</sup>

*Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 **without** a School Year 2022-2023 P-EBT Plan for School Children.*

**1. State:** Commonwealth of the Northern Mariana Islands (CNMI)

**2. Primary Citation:** Families First Coronavirus Response Act (FFCRA), as amended.

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

**a.** Estimated total amount of P-EBT benefits the state will issue within this amendment's date range. (Consult the appropriate table in Section 4, "Benefit Levels.")

- Estimated amount issued to school children

CNMI estimates a total of **\$1,517,602** will be issued for Summer P-EBT benefits. This total is calculated as follows:

- **\$1,517,602** issued to eligible school children, calculated using an estimate of 10,918 eligible children multiplied by the standard \$139.

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

- Estimated number of school children

CNMI estimates a total of 10,918 school children will be eligible for Summer P-EBT benefits.

**c.** Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.

- School children

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<sup>1</sup> Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

In consideration of upcoming P-EBT issuance schedules, CNMI's tentative issuance for Summer P-EBT 2023 benefits will begin August 2023 as planned Summer P-EBT 2022 tentatively will be issued in May June 2023. This would give CNMI ample time to prepare the P-EBT Summer 2023 coupon benefits. Families have to pick up their Summer 2023 benefits by September 29, 2023 and redeem by March 31, 2024.

- d. Names of state agencies involved in administering this plan.

CNMI Public School System, Child Nutrition Program (CNP); and CNMI Department of Community & Cultural Affairs', Nutrition Assistance Program (NAP).

#### 4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
  - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
  - Children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

- Describe how the state will ensure that households with children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

CNMI operates NSLP and SBP under the Community Eligibility Provision (CEP) which entitles all public school children to a free meal per day and most private school children to a reduced-price meal or free meal if income eligible. Regardless of meal status, all CNMI school children are eligible for Summer P-EBT benefits. CNP will begin communicating with all State Public and Private schools to start compiling their data records for the 2023 summer benefits. CNMI will identify school children who were actively enrolled during month last month of the school or graduated at the end of the school year for SY 2022-2023 to be eligible for summer benefits.

## 5. Benefit Levels

### Summer 2023 P-EBT Benefit

*Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.*

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139

## 6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 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.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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?

Day	Milestone
Day #0	USDA-FNS approves CNMI P-EBT State Plan
Day #1	NAP collaborates with Printing Agent for design of P-EBT coupons. NAP initiates change orders for Printing Agent
Day #1	CNP notifies and requests public and private schools to begin compiling school rosters of children who were actively enrolled or graduated at the last month of the school year
Day #5	CNMI issues press release of the P-EBT program. Public notice campaign begins.
Day #5	P-EBT Call Center becomes active.
Day #20	CNP receives updated rosters from public and private schools. CNP begins consolidating and validating data.
Day #30	Approval of change order for printing agent contract. Printing Agent begins printing of P-EBT coupons
Day #30	CNP completes validation of SY 22-23 roster for summer benefits. Finalizes roster and submits to NAP.
Day #35	NAP uploads P-EBT summer student rosters in NAP eligibility system
Day #45	NAP receives coupons from Printing Agent and begins procedures for coupon accountability and validation
Day #60	NAP initiates distribution of summer P-EBT benefits with ID cards and summary of benefits
Day #75	NAP uploads additional student roster not included in the initial upload or additional entitled benefits
Day #90	Last <b>day</b> to pick up summer P-EBT benefits
Day #300	Last <b>day</b> to redeem summer P-EBT benefits

## 7. Customer Service

*To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.*

- 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 to 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?

The sources for student information will derive from the roster provided by the schools and validated by CNP. If disputes or concerns arise, information will be verified from the sources. CNMI will activate the P-EBT Center for inquiries and disputes concerning P-EBT. NAP Staffs designated to the Call Center are educated about the process of the P-EBT program. The staffs are experienced with customer service and handling of disgruntled callers and are experienced with research for addressing inquiries, concerns or disputes.

Schools facilities are situated across the islands. School facilitators are brilliant for disseminating information to parents and guardians. In addition, CNP and NAP will issue public notices through media sources such as newspaper, radiocast, and newscast, including websites, and social media.

The method for receiving summer benefits is through in-person pick up at the NAP designated facilities. Households who do not want the summer benefits may simply decline by not picking up the benefits. Summer benefits will be forfeited after the summer benefits expire.

CNMI will update the info sheet distributed from the prior P-EBT programs. The info sheet brochure should describe about of the P-EBT program, eligibility for P-EBT, how the benefits will be distributed, an explanation of where the benefits can be used and how benefits can and cannot be used, an explanation of violations and penalties, an indication that P-EBT coupon benefits are non-transferable, and information regarding a call center to call if they have questions. This will be provided to NAP and non-NAP households and will be posted on the CNP and NAP websites.

## **8. Over-issuance of P-EBT benefits**

*To complete Section 9, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.*

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.

In the event an anomaly has been discovered and which involves over-issuance P-EBT benefits, collection efforts by the CNMI must initiate. A written notification must be issued to the affected household stating the reason of the claim and the amount of the claim, in addition, the notice should specify to the household of the appeals or fair hearing process to dispute the claim. In the event a hearing date is decided and held, the decision by the Hearing Officer will be considered final. Payment errors will be managed by the NAP Benefit Issuance and Claims Accountability Unit by utilizing the NAP standard process of claim notification, collection and payment procedures, appeals, and case management.

CNMI commits to informing USDA of any overpayment before taking any action to recover benefits from households. In addition to informing USDA, CNMI will fill out the spreadsheet that USDA provided to CNMI involving overpayments which should include the size of the overpayment, the number of children affected, the reason for the error, and a thorough explanation of the corrective action the CNMI will take or has taken to prevent a recurrence of the error.

## **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. 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 10 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 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.”

**12. 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.

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

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

**Reminder**

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

**Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:**

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Signature  
Alfred A. Ada  
Commissioner, CNMI Public School System

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Signature

Vivian T. Sablan

Acting Secretary, Department of Community & Cultural Affairs

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