

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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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) 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 Commonwealth of the Northern Marianas Islands.

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: *August 2021 – May 2022*
 - for children in child care: *August 2021 – May 2022*
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range. *For estimation/budgeting purposes ONLY. The total estimated amount of P-EBT benefits CNMI will issue is in the amount \$6,341,055.84 or \$634,105.58 monthly covering August 2021 to May 2022. CNMI will issue benefits in two schedules. The first schedule would be based on eligible days derived from mandates for school or classroom closure or virtual learning days determined for each school for an estimated benefit cost of \$4,227,370.56 for the period covering August 2021 to December 2021. The second schedule will be based on claims or attestations that have been verified. CNMI estimates that this cost would be half of the estimated P-EBT benefits from the first schedule or cost of \$2,113,685.28 covering January 2022 to May 2022. The reimbursement for P-EBT is \$8.28 per day.*
- *Estimated amount issued to school children in SNAP households: \$3,747,424.50*
1st Schedule: \$2,498,283.00
Number of school children in NAP households: 6,705 (PSS)
Rate of P-EBT days per child: 45 days
2nd Schedule: \$1,249,141.50
Half of cost from 1st Schedule
 - *Estimated amount issued to school children in non-SNAP households: \$1,807,296.30*
1st Schedule: \$1,204,864.20
Number of school children in non-NAP households: 2,347 (PSS)
Rate of P-EBT days per child: estimated 45 days (PSS)

¹ 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 amount to be issued to non-NAP households: \$874,492.20 (PSS)
Number of school children in non-NAP households: 1,900 (Private Schools)
Rate of P-EBT days per child: estimated 21 days (Private Schools)
Estimated amount to be issued to non-NAP households: \$330,372.00 (Private Schools)

2nd Schedule: \$602,432.10

Half of cost from 1st Schedule

- Estimated amount issued to non-school children in child care: \$786,335.04

1st Schedule: \$524,223.36

Number of non-school children in child care: 2,638

Rate of P-EBT days per child: 24 days

2nd Schedule: \$262,111.68

Half of cost from 1st Schedule

- c. Estimated total **number** of children to which the State will issue P-EBT benefits.:
13,590

- Estimated number of school children in SNAP households: 6,705
- Estimated number of school children in non-SNAP households: 4,247
- Estimated number of non-school children in child care: 2,638

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

- School children in SNAP households: 1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)
- School children in non-SNAP households: 1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)
- Children in child care: 1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)

Response:

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

The date range covered by this State plan or amendment is from August 2021 to May 2022.

- b. **Estimated monthly and total amount of P-EBT benefits the State will issue within this plan/amendment's date range.** Estimated total amount of \$6,341,055.84.

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

- **Estimated number of school children in SNAP households.**
CNMI estimates a total number of 6,705 school children in NAP households will be issued P-EBT benefits.
- **Estimated number of school children in non-SNAP households.**
CNMI estimates a total number of 4,247 school children in non-NAP households will be issued P-EBT benefits.
- **Estimated number of non-school children in child care**
CNMI estimates a total number of 2,638 child care non-school aged children in NAP households will be issued P-EBT benefits.

d. Tentative P-EBT issuance schedule.

CNMI plans to distribute P-EBT benefits via drive-thru distribution. Drive-through distribution is utilized to only distribute benefits, and NOT to determine eligibility. Eligibility is pre-determined based upon attendance records and attestations that will have been determined prior to distribution. Benefits will be issued to the listed parent or guardian of the child, as listed with the PSS or Private school registrar. If more than one parent or guardian is listed, one will be the Head of household, while the other will be an Authorized Representative. Identity of Head of household or Authorized representative shall be confirmed by inspection of a Government issued ID. Benefits can only be issued once to a respective Household. Each Household will contain only one student that will have the associated Head of Household/Authorized Guardian listed, as received through school records, to receive PEBT benefits. The distribution plan is to begin distributing benefits on October 10, 2022(TBD) for P-EBT benefits covering the months of August 2021 through December 2021, and December 12, 2022(TBD) distribution of P-EBT benefits covering the months of January 2022 through May 2022.

- **School children in SNAP households –**
1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)
- **School children in non-SNAP households**
1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)
- **Children in child care**
1st Schedule – October 10, 2022(TBD); 2nd Schedule – December 12, 2022(TBD)

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

The NAP will receive data from the CNMI Department of Education, Child Nutrition Program (CNP), the agency which shall receive all school information from the public schools, private schools, and childcare centers. This data shall contain student specific records of days present, days absent, and days in virtual learning status, including classroom-wide and/or school-wide closures. The data provided to CNP will be certified by the respective school and/or child care entity and that the data covers for school year 2021-2022. From the certification, the CNP and NAP is assured that only data included will be from enrollment from school year 2021-2022.

COVID-related absences for purposes of P-EBT eligibility is any absence where the school directs students to stay home for a COVID-related reason. As long as students are home at the school's direction, and the school is acting out of "concern" about COVID then these are PEBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school's or the state's protocol for managing COVID outbreaks, positive tests, potential exposure, etc.

This includes any absence initiated by the parent that is recognized and accepted by school officials as COVID-related. At the discretion of the school, this could include a parent's decision to keep their child home after a positive test or possible exposure to COVID. It could also include, and at the discretion of the school, a parent's decision to keep their child home after exposure at school in cases where the school does not direct the child to stay home. In all cases, the school may count these as P-EBT-eligible days if the school records them as excused absences and recognizes or accepts them as COVID-related. However, schools will not simply count every excused absence as a P-EBT eligible day. In addition, PSS will not count unexcused absences as P-EBT-eligible days.

- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals²? 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. In 2018-2019 the CNMI transitioned to CEP (Community

² The burden associated with National School Lunch Program applications is covered under OMB Control # 05840026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

Eligibility Provision). Operating the CEP entitles every public-school child to a free breakfast, lunch and snack when dining at a public-school cafeteria without being required to submit applications. Aside from the public schools, such as private schools and child care facilities, if a child was determined not free-meal eligible such child will be charged the reduced rate. Currently, the reduced rate is charged to most children in all private schools and childcare centers however no application is required to be submitted. These children can be identified from the data provided by the private entities.

- 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. CNMI PSS will compile and analyze information containing details regarding school closures, classroom closures, virtual learning days, and student excused absences, due to COVID-19, throughout the SY2021-22. This includes both public and private schools.
- 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.)
PSS will obtain actual attendance information from each school and has collected attendance data on a monthly basis throughout the SY2021-22. The information will not need to be updated as attendance records will have been verified from actual student attendance records where feasible or practical.
- 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). The State agencies involved with the CNMI P-EBT program are the DCCA Nutrition Assistance Program (NAP) and the CNMI Department of Education Child Nutrition Assistance Program (CNP). CNP will be responsible for compiling and verifying school enrollment and attendance records and child care facilities enrollment and attendance records. In addition, CNP will validate each child's P-EBT eligibility and, based upon the school records, including the parent/guardian of each student. Overall, CNP will be responsible for confirming P-EBT eligibility, who will then provide NAP the final roster of eligible school-aged children and the number of days of P-EBT eligibility. The NAP will be responsible to verify against NAP records any child in child care being claimed for benefits. A child in child care must be verified as NAP recipient to receive P-EBT benefits. The NAP will be responsible for issuing P-EBT benefits to eligible households. NAP will upload the roster in the NAP eligibility system, check for potential duplicates and resolve if any, generate the household's entitled benefit and distribute the P-EBT benefit via drive-thru at the NAP facility. NAP will generate reports and provide to CNP and FNS.
- 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. The school related attendance data provided by CNMI PSS will be the primary means

for confirming eligibility for P-EBT. PSS will make simplified assumption that any student's individual excused absence may be due to COVID-19 but will require a parent/guardian attestation to confirm the cause of the absence as being COVID-19 related, unless in the rare cases that it can be confirmed through school records that the absence was due to COVID-19. Justification for this assumption is that, consistent with CDC recommendations for isolation and quarantine, any illness or symptom could be COVID-19 related, and to reduce the spread of COVID-19, the child would stay home. This is also supported by directives issued by PSS and CDC guidelines. However, schools will not simply count every excused absence as a P-EBT eligible day, the school may count as P-EBT-eligible days if the school records them as excused absences and recognizes/accepts them as COVID-19 related.

Any absence where the school directs students to stay home for a COVID-related reason, shall be deemed a P-EBT eligible absence. As long as students are home at the school's direction, and the school is acting out of "concern" about COVID, then these are P-EBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school's or the state's protocol for managing COVID outbreaks, positive tests, potential exposure, etc. It is CNMI's understanding that USDA will not second-guess any state or school that directs students to stay home for COVID-related reasons. This includes virtual learning days, where the student attended class via remote learning, and did not attend face-to-face schooling.

In the likely event that attendance data does not contain the associated reason for the excused absence, additional attention should be warranted. The individual attendance data for the child will be examined and PSS CNP shall determine which, if any, are COVID-19 related.

Should the parent/guardian of the child wish to attest to the number of a student's individual absences and/or eligible P-EBT days, outside of closures and virtual days, the parent/guardian will be instructed to contact the CNMI P-EBT Customer Care Center for adjudication, within 30 calendar days from the first distribution, TBD. If a parent is not in agreement with the P-EBT amount to be received for an approved child based on the child's recorded attendance, the parent will have the opportunity to initiate a review process to determine if the student should have had a higher COVID-19 related absence count than was originally reported by PSS. Families can call the P-EBT hotline to request for additional information on the number of COVID-19 related absences. Call center staff will provide callers with guidance in filling out the standard reconsideration application document and submission instructions for the household's standard reconsideration application, to be signed by the parent or guardian. This attestation shall list the COVID-19 related absences for the child, and will then be confirmed with school attendance records for excused absences. This signed attestation by the parent or guardian, as verified/accepted by PSS-CNP, shall prevail and be non-contestable. For questions that CNP/NAP cannot respond to, such as individual student eligibility questions, the family will be referred to the student's school.

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. PSS will determine the period of duration of closures, reduced hours, and reduced attendance of the CNMI's schools based upon actual attendance records and school closure dates.
- 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? CNMI Public Schools are situated on the three islands; Saipan, Tinian, and Rota. During the COVID public health emergency designation, all CNMI schools were either closed or were operating with reduced attendance or hours for at least 5 consecutive days. PSS will confirm that a child's school has been closed or is operated with reduced attendance or hours for a minimum of five consecutive days through examination of School attendance records and Board of Education decrees. Upon verification, attendance record and Board of Education decrees CNP will determine whether the threshold of five consecutive days have been missed due to COVID-19.
- 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.) PSS will obtain attendance information from each School and has collected attendance data on a monthly basis.
- 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. PSS has collected attendance data for school year 2021-22 and will be able to provide accurate data describing COVID related absences.

- 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. The school related attendance data provided by CNMI PSS will be the primary means for confirming eligibility for P-EBT. PSS will make simplified assumption that any student's individual excused absence may be due to COVID-19 but will require a parent/guardian attestation to confirm the cause of the absence as being COVID-19 related, unless in the rare cases that it can be confirmed through school records that the absence was due to COVID-19. Justification for this assumption is that, consistent with CDC recommendations for isolation and quarantine, any illness or symptom could be COVID-19 related, and to reduce the spread of COVID-19, the child would stay home. This is also supported by directives issued by PSS and CDC guidelines. However, schools will not simply count every excused absence as a P-EBT eligible day, the school may count as P-EBT-eligible days if the school records them as excused absences and recognizes/accepts them as COVID-19 related.

Any absence where the school directs students to stay home for a COVID-related reason, shall be deemed a P-EBT eligible absence. As long as students are home at the school's direction, and the school is acting out of "concern" about COVID, then these are P-EBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school's or the state's protocol for managing COVID outbreaks, positive tests, potential exposure, etc. It is CNMI's understanding that USDA will not second-guess any state or school that directs students to stay home for COVID-related reasons. This includes virtual learning days, where the student attended class via remote learning, and did not attend face-to-face schooling.

In the likely event that attendance data does not contain the associated reason for the excused absence, additional attention should be warranted. The individual attendance data for the child will be examined and PSS CNP shall determine which, if any, are COVID-19 related.

Should the parent/guardian of the child wish to attest to the number a student's individual absences and/or eligible P-EBT days, outside of closures and virtual days, the parent/guardian will be instructed to contact the CNMI P-EBT Customer Care Center for adjudication, within 30 calendar days from the first distribution, TBD. If a parent is not in agreement with the P-EBT amount to be received for an approved child based on the child's recorded attendance, the parent will have the opportunity to initiate a review process to determine if the student should have had a higher COVID-19 related absence count than was originally reported by PSS. Families can call the P-EBT hotline to request for additional consideration on the number of COVID-19 related absences. Call center staff will provide callers with guidance in filling out the standard reconsideration application document and submission instructions for the household's standard reconsideration application, to be signed by the parent or guardian. This attestation shall list the COVID-19 related absences for the child, and will then be confirmed with school attendance records for excused absences. This signed attestation by the parent or guardian, as

verified/accepted by PSS-CNP, shall prevail and be non-contestable. For questions that CNP/NAP cannot respond to, such as individual student eligibility questions, the family will be referred to the student's school.

- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models. A virtual day may count for P-EBT eligibility when the school attended by the child is closed (completely virtual) or operates at reduced attendance or hours (partially virtual) due to COVID-19, and the student could have received free or reduced-price meals at the school except for the school closure or reduced operations. Students attending virtual instruction that is provided by school or school district staff, or contract staff hired by the school, in response to COVID, are P-EBT eligible, even if attendance was elected by the student or parent.

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:

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.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard. Public schools are situated on the three islands; Saipan, Tinian, and Rota. During the public health emergency designation, all CNMI schools were either closed or were operating with reduced attendance or hours for at least 5 consecutive days. This included child care facilities. Considering the small-scale geographic area within the three populated islands, every child under the age of 6 in the CNMI resides near a school which was closed or was operating with reduced attendance or hours. This constitutes every child in the CNMI under the age of 6 shall be deemed enrolled in a child care facility under the FFCRA. Any child under 6 years old AND is a member of a household receiving NAP assistance from August 1, 2021 through May 31, 2022 will be considered a child eligible for P-EBT benefits under the Child Care Facility children group and their benefits shall be similar to children in public schools.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements? Any CNMI child under the age of 6 AND is a member of a household receiving NAP assistance anytime from August 1, 2021 through May 31, 2022 would be eligible for P-EBT benefits under the Child Care Facility children group. This constitutes all children under the age 6

in the NAP database system that will be considered as eligible for P-EBT benefits. All child data provided in the CNP final roster will be verified against NAP recipient data to confirm the child's receipt of NAP benefits. Information received from CNP will not be disclosed in accordance with SNAP privacy requirements.

- 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) Every child under the age of 6 in the CNMI resides near a school which was closed or was operating with reduced attendance or hours. This constitutes every child in the CNMI under the age of 6 shall be deemed enrolled in a child care facility under the FFCRA. Any child under 6 and is a member of a household receiving NAP assistance between August 1, 2021 through May 31, 2022 will be considered a child eligible for P-EBT benefits under the Child Care Facility children group.
- 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?

These do not apply. Every child under the age of 6 in the CNMI resides near a school which was closed or was 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 PEBT in those areas? The executive orders mandated under the Declaration of State of Public Health Emergency covered all child care facilities in the CNMI.
- 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.) Child care facilities must provide their enrollment roster with their hours of operation schedule to the CNP. CNP will provide a validated roster to NAP. The information provided in the roster will be verified against NAP participant data. Information provided by child care facilities must be provided/recorded on a monthly basis.
- 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.) Benefits levels will be set for children eligible for P-EBT based upon the number of days that the child has been unable to receive meals in school, multiplied by the standard rate set forth

by USDA School Meals Program for the CNMI at \$8.28 per day that the child was unable to receive meals at school.

- 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). The partners involved in P-EBT are the School entities, Child Care facilities, CNP and the NAP. The role of the child care facilities is to provide relevant information of enrolled children and their facility's hours of operation. CNP is responsible for receiving the information from the child care facilities and validating the child with CNP records and prepare a roster for NAP. Under the FFCRA, certain children under the age of 6 may not necessarily be enrolled, but are deemed as enrolled, may not be listed by any child care facility roster. Under these circumstances, CNP must accept any child information who is under the age of 6 and include the child under the Child Care Facility children group. The role of the NAP is to verify whether the child is a member of a household who is receiving NAP assistance between August 1, 2021 through May 31, 2022. If a child is confirmed to be a member of an eligible household the child will be provided P-EBT benefits as appropriate. In addition, the role of the NAP is to distribute the P-EBT benefits to eligible households.
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail. CNMI proposes the simplifying assumption that all children under the age 6 who are members of an eligible NAP household and enrolled in the covered child care facility will be considered eligible under the Child Care Facility children group. Children deemed enrolled under the FFCRA will automatically be included whenever P-EBT is determined for the Child Care Facility children group. Child-Care children shall receive benefits for absences recorded as COVID related and thus as PEBT days as recorded by the structured Day Care center. For those that are not enrolled in structured Day care centers shall be given the weighted average of the established structured Day Care Centers in the CNMI, which equates to approximately 24 days.

Justification being that last year's P-EBT child care plan was easier to deal with because public schools had one standard number of reimbursement PEBT days for all PSS children. NAP children considered in child care were provided the same number of P-EBT days as PSS children, because every CNMI child lived near a PSS school, except no P-EBT benefit should be given for the months the child was not a NAP participant during SY 2020-21. Although it took us several weeks to reconcile that data. This year, PSS has varying days and we consider an overwhelming administrative burden to determine residence for each of the 2,300 some NAP children under age 6 and associate them to a school with the added layer of parent/guardian's student attestations for P-EBT days will vary for most children. We are able to determine whether children that are enrolled in child care are NAP participants, and able to determine the children under age 6 (per FFCRA) who are NAP participants, but our challenge is the number of P-EBT days children in child care would be entitled to P-EBT benefits. Therefore, upon examination of

data provided by established structured Day Care Centers, a weighted average of 24 days was reported as COVID-19 related closure days. CNMI proposes to provide 24 days of reimbursement for every NAP child in the child care group not in a structured Day Care Center, with the condition that the child was a NAP participant during ~~any~~ **applicable** months in SY 2021-2022.

6. Benefit Levels

<i>Standard for Benefit Levels</i>				
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	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

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.

There will be two groups:

1. School-aged children in kindergarten to Grade 12, in private or public schools; and
2. Child Care Facility children under the age of 6 years old.

The simplifying assumption for group 1 (School-aged children kindergarten to Grade 12) is that eligibility for P-EBT will be based on the public school system school schedule. PSS will make simplified assumption that any student's individual excused absence may be due to COVID-19 but will require a parent/guardian attestation to confirm the cause of the absence as being COVID-19 related, unless in the rare cases

that it can be confirmed through school records that the absence was due to COVID-19. Justification for this assumption is that, consistent with CDC recommendations for isolation and quarantine, any illness or symptom could be COVID-19 related, and to reduce the spread of COVID-19, the child would stay home. This is also supported by directives issued by PSS and CDC guidelines. However, schools will not simply count every excused absence as a P-EBT eligible day, the school may count as P-EBT-eligible days if the school records them as excused absences and recognizes/accepts them as COVID-19 related.

In the likely event that attendance data does not contain the associated reason for the excused absence, additional attention shall occur. The individual attendance data for the child will be examined and PSS CNP shall determine which, if any, are COVID-19 related.

Should the parent/guardian of the child wish to attest to the number of a student's individual absences and/or eligible P-EBT days, outside of closures and virtual days, the parent/guardian will be instructed to contact the CNMI P-EBT Customer Care Center for adjudication, within 30 calendar days from the first distribution, TBD. Call center staff will provide callers with guidance in filling out the standard reconsideration application document and submission instructions for the household's standard reconsideration application, to be signed by the parent or guardian. This attestation shall list the COVID-19 related absences for the child, and will then be confirmed with school attendance records for excused absences.

The simplifying assumption for group 2 (Child Care children). PSS will make simplified assumption that any student's individual absence may be due to COVID-19 but will require a parent/guardian attestation to confirm the cause of the absence as being COVID-19 related, unless in the rare cases that it can be confirmed through school records that the absence was due to COVID-19. Justification for this assumption is that, consistent with CDC recommendations for isolation and quarantine, any illness or symptom could be COVID-19 related, and to reduce the spread of COVID-19, the child would stay home. However, schools will not simply count every excused absence as a P-EBT eligible day, the school may count as P-EBT-eligible days if the school records them as excused absences and recognizes/accepts them as COVID-19 related.

In the likely event that attendance data does not contain the associated reason for the excused absence, additional attention shall occur. The individual attendance data for the child will be examined and PSS CNP shall determine which, if any, are COVID-19 related.

Should the parent/guardian of the child wish to attest to the number of a student's individual absences and/or eligible P-EBT days, outside of closures and virtual days, the parent/guardian will be instructed to contact the CNMI PEBT Customer Care Center for adjudication.

The simplifying assumption for children in Child Care will be based on the requisites that the child is under the age of 6 and is/was a member of a household who received NAP benefits during August 1, 2021 to May 31, 2022. An examination of data provided by established structured Day Care Centers produces a weighted average of 24 days as being COVID-19 related closure days. CNMI proposes to provide 24 days of reimbursement for every NAP child in child care with the condition that the child was a NAP participant during ~~any~~ applicable months in SY 2021-2022.

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.

Day #0	Coordination between NAP and CNP, collaborate on planning of P-EBT, finalize roster template, and procedures to process and validate data for eligibility and benefit level. PSS will meet with private schools and child care entities and request for SY21/22 data and provide it to CNP. CNP begins consolidating and validate data. Discuss impact of P-EBT benefits with wholesalers. DCCA and DOE sign off on MOA and PEBT SY21-22 state plan.
Day #0	USDA approves CNMI P-EBT State Plan
Day #1	Collaborate with NAP printing agent for design of P-EBT coupons. NAP initiates change orders for Printing Agent. PSS coordinate with schools to gather attendance data.
Day #1	CNMI issues press release of the P-EBT program. Public notice campaign begins.
Day #5	CNP receives updated school and child care facility rosters. CNP begins consolidating and validate data.
Day #15	Approval of change order contracts
Day #16	Printing Agent begin printing of P-EBT coupons.
Day #20	CNP receives updated school and child care facility rosters. CNP finishes consolidation and begins validation of SY21/22 attendance/roster data. NAP develops eligibility listings for child care children under 6 years old from NAP eligibility listings.
Day #30	CNP completes SY21/22 updated school and child care facility rosters.

Day #31	CNP provides NAP of certified P-EBT roster data. NAP begins to consolidate CNP SY21/22 eligibility listings and child care children < 6 years old.
Day #35	NAP begins ID card and benefit summary notice printing. P-EBT coupons delivered to NAP.
Day #45	NAP finishes roster/attendance uploading and processing into eligibility systems. P-EBT coupons validation completed and ready for distribution.
Day #60	NAP begins to upload SY21/22 attendance/roster data into eligibility system.
Day #75	NAP distributes 1st batch of P-EBT benefits covering August 2021 to June 2022.
Day #135	NAP distributes 2nd batch of P-EBT benefits covering August 2021 to June 2022 for households that may have been certified by CNP late, or for any reason did not receive certification of eligibility before the 1st distribution

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? CNMI will issue P-EBT benefits through the use of specially printed coupons. A unique P-EBT ID Card will be issued to the parent or guardian of the P-EBT eligible child(ren)'s household. The P-EBT ID cards will be issued to non-NAP households and ongoing NAP 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 SY 2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT. NMI will coordinate the printing of P-EBT coupon benefits that are distinguishable from ongoing NAP benefits. Distinct design and color will be coordinated. This will help staff, recipients, retailers, and banks identify the difference between the two types of program benefit. This is important for retailers and banks who must segregate the two program types for making deposits separately. A P-EBT deposit ticket will be provided to retailers so they can separately deposit P-EBT coupons from ongoing NAP coupons in order to properly record, report and maintain accountability for P-EBT coupons
- 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 grant award for P-EBT that is expected to be issued to the CNMI will be accounted for separately and an account number designated in the ASAP. Expenditures that are approved under the state plan for P-EBT will be drawn down from the CNMI P-EBT ASAP account. Similarly, expenditures for NAP and D-NAP will be drawn down from their respective ASAP accounts.
- 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. CNMI will issue P-EBT benefits using P-EBT coupons. CNMI plans for the coupons to

be valid from October 1, 2022 to March 31, 2023. This will allow for P-EBT household recipients an adequate number of days to use their P-EBT coupons. P-EBT coupons after March 31, 2023 will no longer be valid for use.

- 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 CNMI will not be issuing EBT cards for this program, and will be issuing P-EBT coupons with an expiration date of March 31, 2023.](#)
- 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 CNMI will not be issuing EBT cards for this program, and will be issuing P-EBT coupons with an expiration date of March 31, 2023.](#)

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 from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential PEBT 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. [CNMI will be distributing P-EBT benefits retroactively based on the eligibility of the child and does not anticipate a significant number of disputes or issuance errors. However, disputes or concerns may arise, and CNP will have a customer service center and hotline at the CNP office to receive calls regarding P-EBT. Staffs will be designated and will be educated about the process of the P-EBT program. The staff will be trained on customer service and proper handling of disgruntled callers and to research and address the concerns or disputes.](#)
- 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. The CNMI will serve groups with potential access problems through press releases, community bulletins, radio PSAs, and coordination through PSS and other governmental and non-governmental organizations to disseminate P-EBT information to the community.

- 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). CNMI will introduce the P-EBT program to the public initiated with a press conference and/or press releases will be issued to the media to print and broadcast. The press releases and advertisements will be posted on social media. School and child care facilities will be requested to disseminate information through their communication methods such as school bulletins, letters to parents/guardians and through their social media outlets. NAP and CNP will post P-EBT information on their websites and will reach out to their partnering agencies to share the information with their network.

- 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. The CNMI will not be issuing EBT cards for this program, and will be issuing P-EBT coupons to eligible households with eligible child by drive thru, face-to-face. Households that do not want the P-EBT benefits can simply not come to the NAP office to pick up their P-EBT benefits.

- 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)

CNMI will provide an information sheet. The info sheet will contain a description 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.

- 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?

CNMI's public information campaign addresses the outreach to non-NAP households through press releases, social media, and school/child care facilities' bulletins and letters to parents. CNMI will provide P-EBT information to NAP households through the NAP newsletters issued monthly to households when receiving their NAP benefits. The NAP and CNP will post P-EBT information on their websites and social media.

9. 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.

CNP will verify data/information provided by the schools and child care facilities with available CNP data/information to determine student eligibility and benefit amount. CNP will produce a certified list via a roster that will be submitted to the NAP for disposition of P-EBT distribution.

CNMI, via the CNP office, will be determining eligibility retroactively based on the designated school and child care eligibility. As a result, CNMI does not anticipate over-issuance of P-EBT benefits. However, CNMI does not rule out the possibility of administrative errors or improper payments. In the event such anomaly has been discovered, efforts by the CNMI should be made to adjust the next P-EBT benefits to reduce or increase, where applicable. In the event that no further benefits will be available to make the adjustment, the over-issuance must be handled administratively. A written notification must be issued to the affected household stating the reason of the claim and the amount of the claim, in addition to a notice to the household an appeals or fair hearing process must be accorded if they want to dispute the claim. In the event a hearing date is decided and held, the decision by the Hearing Officer will be considered final.

Please describe how your State will manage P-EBT payment errors. CNMI-NAP will process payment errors according to established rules and regulation regarding claims. For example, upon discovery of a payment error, affected household will be contacted alerting household of error, notice of claim shall be produced, and a payment schedule will be instituted.

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. CNMI agrees to comply with all applicable requirements and benefit issuance reporting.

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, 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.

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 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.

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
Print Name and Title

Signature
Print Name and Title

Date of Request _____