

**Amendment to Approved State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2022**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	Amendment to Approved State Plan for Pandemic EBT: Children in School and/or Child Care, Summer 2022
Document ID:	
Z-RIN:	
Date of Issuance:	May 9, 2022
Replaces:	N/A
Summary:	(1) This document is a template to assist States in the development of an amendment to extend their approved State plan to operate Pandemic EBT for school children and for children in child care during summer 2022. (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), and the American Rescue Plan Act, 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 submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

**Amendment to Approved State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2022**

1. **State:** [Commonwealth of the Northern Mariana Islands \(CNMI\)](#)
2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA) as amended by the American Rescue Plan Act of 2022
3. **Here's what FNS needs from you:**
 - a. If a State chooses to elect the U.S. standard benefit¹, simply check the box below. Next, go to letter 'c' (*Estimated total amount of P-EBT benefits*) of the template.

By checking this box, we are indicating that our State will use the U.S. standard benefit for the covered summer period. We understand that USDA is only able to offer an interim standard benefit for children in child care at this time; USDA will provide states with additional guidance in mid to late June 2022 / early July that specifies the remaining amount of the USDA standard benefit for children in child care commensurate with the expiration date of the public health emergency.

- b. If a State chooses not to elect the U.S. standard benefit, FNS needs the following information:
 - The number of days for which benefits will be issued as part of the State's covered summer period; and
 - An explanation for how the State arrived at the number of days in the State's covered summer period. USDA will not approve a plan that does not tie the length of its covered summer period to the actual summer 2022 calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.
 - For the child care portion of the plan, USDA can only guarantee benefits through July 9. USDA considers this to be 1/2 through the typical State's covered summer period. For purposes of calculating an interim summer P-EBT benefit for children in child care, States may apply this 1/2 fraction to the full summer benefit that the State has calculated for school children.

¹ The U.S. standard benefit – as defined in Question #5 of FNS' Summer 2022 P-EBT Q&As – is equal to the median number of weekdays in a sample of each State's largest school districts multiplied by the daily P-EBT rate. For States in the continental U.S., that works out to a fixed summer benefit of \$391 per eligible child (55 days at \$7.10 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #15 for a complete set of standard benefit amounts.

- If the State believes that this date is more or less than 1/2 through the typical summer period of the State’s schools, please support your position with data on the most common start dates of the summer break in the State’s schools.
- As discussed in item #16 of USDA’s P-EBT Summer 2022 Q&As, USDA will provide states with additional guidance by mid to late June / early July that specifies the remaining fraction of the full USDA standard benefit that States may provide to children in child care.

Response: N/A – CNMI elects to use the standard benefit of \$455

- c. 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
 - Estimated amount issued to non-school children in child care

CNMI estimates a total of **\$6,080,620** will be issued for Summer P-EBT benefits. This total is calculated as follows:

- **\$4,967,690** issued to eligible school children, calculated using an estimate of 10,918 eligible children multiplied by the standard \$455.
- **\$1,112,930** issued to eligible children in childcare, calculated by taking an estimate of 2,446 children multiplied by the standard \$455.

- d. Estimated total number of children to which the State will issue P-EBT benefits.
- Estimated number of school children
 - Estimated number of non-school children in child care

CNMI estimates a total of 13,364 total children will be eligible for Summer P-EBT benefits. This estimate based on 10,918 children eligible for school P-EBT benefits and 2,446 children eligible for childcare benefits.

- e. Tentative P-EBT issuance schedule (the dates on which Summer P-EBT benefits will be issued). Note that USDA encourages States to distribute summer benefits in two or even three issuances across the summer, to the extent practical.
- School children
 - Children in child care
 - Please provide tentative issuance dates for the interim benefit for children in child care, and for any remaining amount that States will be able to issue following the release of additional guidance from USDA in mid to late June / early July.

In consideration of upcoming P-EBT issuance schedules, CNMI's tentative issuance for Summer P-EBT benefits will begin June 2023 as planned childcare and school issuances will take place in February 2023 and March 2023. This would give CNMI ample time to prepare the ~~P-EBT~~ Summer 2022 coupon benefits. Families have to pick up their benefits by September 29, 2023 and redeem by December 31, 2023.

- f. Describe how the State will identify eligible school children and children in child care for summer P-EBT. You must address each of the following bulleted items, below, when responding.

For school-aged children:

- Describe how the State will identify school children who received P-EBT benefits during the last month of SY 21-22.
- Describe how the State will identify school children who were eligible for free or reduced price school meals under the NSLP and SBP in SY 21-22 but did not receive P-EBT benefits in the last month of the school year because they attended school in-person and benefitted from a free or reduced price meal service at school. This includes children who were eligible for F/RP meals during the school year and did not receive P-EBT benefits because the children attended school in-person during the school year.
- Describe how the State will identify children who are determined newly eligible for free or reduced price school meals during the covered summer period. States must provide an opportunity for families to apply for free or reduced price meals using the normal application process. States and SFAs should consider maintaining a minimum presence to process Free and Reduced Price Meal applications, perhaps on a part-time or weekly basis. Another alternative is for SFAs to accept new Free and Reduced Price Meal applications during the summer but only process them after the start of the new school year. Children determined eligible on applications *submitted prior to the end of the summer* could then be issued P-EBT benefits retroactively after the start of the new school year. (Note that it is preferable to process applications and issue benefits during the summer period that the benefits are intended to cover).

For children in child care:

- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who received P-EBT child care benefits in the last month of the school year.

- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who would have received P-EBT child care benefits in the last month of the school year, but did not receive benefits because their child care facility was not closed or operating at reduced attendance or hours in that month, and neither their child care facility nor the child’s residence was in the area of a school that was closed or operating at reduced attendance or hours in that month.
- Describe how the State will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period

For school-aged children:

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 were eligible for P-EBT benefits. Building off our approved school and childcare plan, CNMI will identify school children who received P-EBT benefits during the last month of the SY 21-22. This is more defined as school children who were actively enrolled in school during last month of school or graduated at the end of the school year to be eligible for summer benefits.

For children in childcare:

CNMI has performed an exhaustive and meticulous process to validate children in childcare. In summary, the data contained in the NAP’s eligibility system was used as the primary source for household member data records including children under the age of 6. Data is extrapolated from the NAP system to generate the parameter list of all children under 6 years old including their associated NAP enrollment for the covered school year period. All children who qualified as students, mostly 5 year olds who were enrolled in Kindergarten (K5) in structured schools during SY 21-22 are purged from the list. Children enrolled in K5 to Grade 12 are considered school-aged children. The modified list or post-purged list represent all the NAP children under age 6 and as the definite list to identify children in childcare who are eligible for P-EBT benefits.

The same process will be conducted to generate a list for summer benefits, except their NAP enrollment will be verified to determine if the child was a participant in NAP during any of the summer months June, July, or August 2022 to be entitled for summer benefits.

4. Confirmation of remaining elements in the State’s approved school plan and/or child care plan

- Please confirm that your P-EBT summer plan mirrors your approved school year 2021-2022 plan for EBT Processing and Benefit Issuance as well as Customer Service (Sections 7 and 8 of the [SY 21-22 State Plan Template for Pandemic EBT](#)). You do not need to describe in detail how you will handle these matters if your summer plan mirrors

your approved school year plan(s); but if your summer plan materially differs from your approved school year plan(s), please describe how.

CNMI confirms that our P-EBT summer plan mirrors our approved school year and childcare plans for P-EBT Processing and Benefit Issuance as well as Customer Service.

5. Benefit Levels

A. U.S. Standard Benefit

Standard Benefit for School Children

2022 Covered Summer Period	U.S. Standard P-EBT Benefit School Children		
	Median Length of Covered Summer Period (weekdays)	Daily P-EBT Rate	Standard Benefit
Contiguous U.S.	55	\$7.10	\$391
Alaska	55	11.44	629
Hawaii, Guam, Virgin Islands, Puerto Rico	55	8.28	455

Standard Benefit for Children in Child Care (Interim)

2022 Covered Summer Period	U.S. Standard P-EBT Benefit Children in Child Care (Interim)			
	Median Length of Covered Summer Period (weekdays)	Length of the Summer During the Public Health Emergency	Daily P-EBT Rate	Interim Standard Benefit
Contiguous U.S.	55	1/2	\$7.10	\$195
Alaska	55	1/2	11.44	315
Hawaii, Guam, Virgin Islands, Puerto Rico	55	1/2	8.28	228

State-Determined Benefit, Based on Daily Rate

Note: The daily benefit amount – \$7.10 – is only needed if a State elects to set its own covered summer period length; that is to say, if a State declines to use the U.S. standard benefit.

2022 Covered Summer Period	Free Reimbursements			
	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>

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.

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 2022 plan after approval, the State needs to submit an amendment to FNS 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:

Signature
 Alfred A. Ada
 Commissioner, CNMI Public School System

Signature
Vivian T. Sablan
Acting Secretary, Department of Community and
Cultural Affairs

Date of Request: _____