

**State Plan for Pandemic EBT
Children in Child Care, 2022-2023**

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) 2022-2023. (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 State Guidance on Coronavirus P-EBT: [Click Here](#)

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

State Plan for Pandemic EBT
Children in Child Care, 2022-2023

1. State: Nebraska

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 child care
- b. Estimated monthly and total *amount* of P-EBT benefits the state will issue within this plan/amendment's date range.
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the state will issue P-EBT benefits.
 - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care
- e. Names of state agencies involved in administering this plan.

Response:

The proposed date range covered by this plan is August 1, 2022 – May 11, 2023.

Nebraska estimates 32,054 children will be eligible for Child Care P-EBT. Nebraska estimates the total amount of Child Care P-EBT benefits issued will be \$6,414,967. This estimate was calculated as followed: 32,054 children x \$21 per month x 9.53 months (May is a partial month).

Nebraska estimates 32,054 children will be eligible for a \$21 monthly benefit based on an analysis of the Fall semester months, multiplied by up to 5 months of eligibility, for an estimated maximum Fall issuance of approximately \$3,205,400. Nebraska estimates 32,054 children under age 6 enrolled in SNAP (average caseload from August – December 2022).

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 2022 through June 2023, for example).

Before calculating its monthly spring P-EBT benefit, Nebraska commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

P-EBT benefits for Fall 2022 (August – December 2022) are tentatively scheduled for May 2023. P-EBT benefits for Spring 2023 (January – May 2023) are tentatively scheduled for July 2023.

4. P-EBT for Children in Child Care

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.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.

- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44². The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children’s eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- 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 #30)
- 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 those children’s eligibility? (See Q&A #32-33). 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?
- 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 P-EBT in those areas?
- 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.)

Response:

² The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

Responsible state agencies

The following agencies are responsible for the development of this plan and will share responsibility for the administration of the plan:

- The Nebraska Department of Health and Human Services

Identifying SNAP-Enrolled Children

- Nebraska will identify non-school children who began the school year 2022-2023 under the age of 6 and were part of a household that receives SNAP.
- Non-school children under the age of 6 in households that applied for SNAP from May 1 through May 11, and were found eligible for SNAP, will receive pro-rated benefits for May 2023. Children who are part of a household that applies for SNAP on May 12 or after are not eligible to receive any child care P-EBT benefits for the month of May.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that non-school children who began receiving benefits as a 5-year-old earlier in the school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- Nebraska understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- Nebraska will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, Nebraska will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches.
- Nebraska will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary

data are available) remain below claims for the most recent same month prior to the pandemic.

Setting Benefit Levels Using the CACFP Data Method

- Nebraska will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using **the following three factors**:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. Based on Nebraska’s anticipated distribution of fall semester P-EBT child care benefits in April 2023 the state will use fall 2022 CACFP claims data for the months of August 2022 through December 2022 .
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[170] \div [10 \text{ months}] = [17] \text{ days per month}$.
3. The school year 2022-2023 P-EBT benefit per day of \$8.18

Table 1: Reduction in CACFP lunch claims – Fall semester

Fall Semester				Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		
August 2019	530,561	August 2022	473,571	
September 2019	483,972	September 2022	419,711	
October 2019	558,048	October 2022	419,207	
November 2019	455,962	November 2022	409,012	
December 2019	454,385	December 2022	374,347	
Total	2,482,928	Total	2,095,848	

Note:

CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Before calculating its monthly fall P-EBT benefit, Nebraska commits to sharing its data and calculations with USDA as these numbers are tentative and subject to change before benefit issuance. The state will also confirm that CACFP claims for

all available months of the fall semester remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Spring semester benefit:

1. The spring semester benefit will be calculated as above, but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of spring semester P-EBT child care benefits in July 2023 the state will use spring 2023 CACFP claims data for the months of January 2023 through March 2023. Final lunch claim numbers for April and May 2023 will likely not be available for calculation purposes by July 2023. Nebraska will use the most recent data available at the time of issuance (likely January through March 2023) to calculate a spring semester benefit amount and will notify USDA of the calculated amount prior to issuance.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[170] \div [10 \text{ months}] = [17] \text{ days per month}$.
3. The school year 2022-2023 P-EBT benefit per day of \$8.18

Table 2: Reduction in CACFP lunch claims – Spring semester

Spring Semester				
CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester: To be applied to daily rate and number of school instructional days per month.
January 2020	517,923	January 2023		
February 2020	493,972	February 2023		
March 2019	538,475	March 2023		
April 2019	579,187	April 2023		
May 2019	577,530	May 2023		
Total	2,707,087	Total		

Note:
CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Before calculating its monthly spring P-EBT benefit, Nebraska commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below

CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

5. Benefit Levels

Standard for Benefit Levels

- 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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

Notes:

- Lunch rates include the 8 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.
- Breakfast rates are those received by "severe need" schools.
- Snack rates are those for afterschool snacks served in afterschool care programs
- The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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.

Response:

Average monthly P-EBT child care benefits, Fall and Spring semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Daily Benefit Amount	Average Monthly Benefit
Fall Semester	-15.6%	17	\$8.18	\$21
Spring Semester (Jan-April 2023)	TBD%	17	\$8.18	TBD
May 2023	TBD%	9	\$8.18	TBD

Notes:

- 1. Percent Change in CACFP Lunch Claims:** These are the figures in the lower right-hand corners of Tables 1 and 2.
- 2. Average Number of Virtual Days per Month:** This is the number of school instructional days in the state's school year divided by the number of benefit months in the state's P-EBT plan. Typically, this is 180 instructional days ÷ 10 benefit months (September through June or August through May).
- 3. Average Monthly Benefit:** This is the outcome of multiplying the figures in the three preceding columns.

Nebraska proposes to set a standard monthly P-EBT Child Care Benefit for the Fall 2022 semester months at 15.6% of the fully-virtual benefit for school-age children (set at 17 days = \$139 per month). This equates to \$21 per month for each of the Fall semester months. This benefit level is based on DHHS' most recent analysis of CACFP data that shows participation 15.6% below pre-pandemic levels throughout the Fall semester months (2019 vs. 2022). Nebraska commits to sharing its data and calculations with USDA as these numbers are tentative and subject to change before benefit issuance.

Nebraska also proposes to set a standard monthly P-EBT Child Care Benefit for the Spring 2023 semester months. The CACFP data for January through May 2023 is unavailable at this time. Due to the White House's announcement indicating that it plans to lift the federal Public Health Emergency (PHE) on May 11, 2023, Nebraska will pro-rate the number of days in May in its monthly benefit calculations, as not all instructional days in May will be eligible for P-EBT. Nebraska estimates 9 school days will occur in May before the PHE ends. Nine school days multiplied by the \$8.18 daily benefit amount equals a monthly amount of \$73. Nebraska will apply the percentage decrease to the \$73 benefit, rather than the full \$139. This will allow eligible children to receive the full benefit for January through April 2023 and a prorated benefit for May 2023.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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.
- 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?

Response:

Nebraska plans to align the Child Care issuance timeline with the state's plan for school-age children. This will allow for DHHS to only issue P-EBT Child Care benefits to children who did not receive a benefit under the school-age plan. The below dates are tentative and contingent upon other factors.

School-Age

Benefit Months	Date Schools Provide Data to NDE	Date NDE Provides Data to DHHS	Issuance Dates
August – December 2022	May 15, 2023	May 22, 2023	June 22, 2023
January – May 2023	June 30, 2023	July 10, 2023	August 15, 2023

Child Care

Benefit Months	Months Used to Determine Average Benefit	Issuance Dates
August	August – December 2022	May 17, 2023
September	August – December 2022	
October	August – December 2022	
November	August – December 2022	
December	August – December 2022	

January	January – March 2023	July 13, 2022
February	January – March 2023	
March	January – March 2023	
April	January – March 2023	
May	January – March 2023	

As was done for the 2020-2021 and 2021-2022 school years, all SNAP Under 6 P-EBT eligible children will be issued P-EBT benefits to the SNAP case/card they were actively receiving benefits on during a particular month within the covered period. There is no new SNAP card design.

Nebraska will continue to distinguish P-EBT from SNAP and DSNAP in the same manner as in the previous rounds. A sub-benefit type of P-EBT will be used for the issuance files. The spend priority and P-EBT expungement rules will remain the same as in previous rounds. P-EBT will be spent first, ahead of any existing authorizations and regular SNAP expungement regulations will be followed.

7. 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 questions from actual or potential P-EBT households.
2. USDA strongly encourages states to provide relevant program information to actual and potential P-EBT households.

To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -

- 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 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?

Response:

P-EBT benefit noticing will be consistent with Nebraska’s SY2021-2022 school-age plan and child care plans, with the understanding that SNAP families have been informed of many of the card-related components previously.

Nebraska established a specific email box for P-EBT-related questions and concerns and SNAP Program staff monitor this mailbox daily. In addition, the ACCESSNebraska phone line was updated so that a specific group of staff will answer P-EBT-specific questions and concerns. This will ensure questions are answered promptly.

To help serve groups with potential access problems, Nebraska will utilize our SNAP Outreach partners and other community agencies to help provide information and assist these populations. Materials will be developed in multiple languages and provided to agencies that will be helping with the distribution of information.

The state will conduct a public information campaign using websites (DHHS and NDE) and social media platforms. Nebraska will issue press releases to target statewide and local news organizations. Due to the May 11 ending of the PHE and the requirement that the state prorate P-EBT benefits for May 2023, Nebraska commits to ensuring the public information campaign will contain updated and accurate information pertinent to P-EBT for school year 2022-2023.

Public inquiries related to P-EBT benefits may be directed to the following email address or phone numbers:

Email: DHHS.NebraskaPEBT@nebraska.gov

Phone: 800-383-4278 or 402-471-9043

8. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.

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.

Response:

Nebraska does not issue P-EBT benefits through our SNAP eligibility system. Any over issuances that are discovered will be handled by contacting USDA before any action is taken.

Nebraska will ensure that regular SNAP benefits are not used for any over-issuances and will instead use a direct billing approach for these issues if needed. Nebraska also commits to completing the over-issuance spreadsheet provided by USDA. This will include documentation on the size of the overpayment, the number of children affected, the reason for the error, and a thorough explanation of the corrective action that the state 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, for the period of performance October 1, 2022 through September 30 2023. 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.

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. 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: _____