

State Plan for Pandemic EBT
Children in Schools 2020-2021

1. State: GUAM

- 2. Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021

3. Executive Summary:

The **Guam Department of Public Health and Social Services (DPHSS)** will issue P-EBT benefits utilizing the date range for this initial and current plan for the School Year 2020-2021 (August 2020 to June 2021).

The **Guam Department of Education (GDOE)** will identify eligible children for P-EBT benefits who are directly certified from SNAP Households (HHs), based on free or reduced price meal applications from school districts through the National School Lunch Program (NSLP) and if the School District was closed or have reduced the number of days or hours that students attend the school for at least 5 consecutive days utilizing the most current available data for SY 2020-2021 (August 2020 through May 2021).

The Guam Department of Education will extrapolate all school districts eligibility data of active students for SY2020-2021 each month captured in the direct certification process and offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application. P-EBT benefits will be issued retroactively whereby 100% of schoolchildren were fully virtual. If a District returned to full In-Person Learning, schoolchildren will no longer be eligible for P-EBT benefits on or after the date they returned 100% In-Person. If the school district was operating on a hybrid schedule by percentage (e.g. In-Person was at 22% at all schools 1 day out of the week and 78% of the total enrolled public schoolchildren as predominantly Virtual Learning for 4 days with no access to school meals), then the benefit issuance will be calculated based on the total number of serving days times the reimbursement rate at the percentage of time schoolchildren were Virtual Learning.

If additional funding for PEBT become available or may be extended to the summer or the next school year, Guam will modify the date range covered of the current plan and inform USDA of any significant increases or decreases in these data points based on requirements.

The estimated **monthly** and total **amount** of P-EBT that Guam will issue within this plan/amendment's date range will be for the School Year August 2020 through June 2021.

- Estimated **Monthly** Issuance: \$ **3,351,319.75**
- Estimated amount issued to school children in SNAP households \$ **1,918,897.05**
- Estimated amount issued to school children in Non-SNAP HHs \$ **1,432,806.75**

The estimated total **number** of children which Guam Department of Education directly certified in SNAP Households and free and reduced applications non-SNAP households for issuance of P-EBT benefits is estimated at **27,942**.

- Estimated number of school children in SNAP households is **16,039**
- Estimated number of school children in non-SNAP households is **11,903**

- Estimated amount issued to school children in non-SNAP households \$ **15,619,327.05**
- Estimated amount issued to school children in SNAP households. \$ **21,087,065.85**
- Estimated TOTAL Issuance: \$ **36,706,392.90**

Guam is requesting **\$474,465.82** to cover the administrative costs with the on-going implementation for the P-EBT benefits. Guam’s initial implementation of P-EBT was designed as a one-time occurrence and utilized in-house staffing to carry out the services and to support P-EBT as an on-going effort, while also managing the increased demand for SNAP and other assistance programs.

Guam will submit a separate request to cover the administrative costs with the on-going implementation for the P-EBT benefits and will use a collaborative effort approach with assistance from Guam Department of Education, Guam Department of Public Health, Guam Department of Labor other agencies or procure service to carry out and provide the necessary customer support.

The following is an estimated breakdown of the administrative costs that will be requested:

System Costs – Data Management Resources Inc. (DMR) <i>Description: Programming and technical activities relative to enhancement of the PH/Pro-BES System to enable BES verification and issuance of Pandemic EBT benefits for eligible Guam Department of Education students.</i>	\$120,000
Customer Service – PEBT Call Center	\$177,918.46
1. DPHSS staff (10 Employees). Anticipated Cost with the expectation to receive calls 8 hrs. per day in the month of July through November 2021.	
2. P-EBT Card Distribution Team (20 Employees)	\$56,864.66
Total:	\$234,783.12
P-EBT unique cards issuance – FIS (100 contractual hours @ \$70.00) = \$7,000 New P-EBT Case \$4.50 each for Non-SNAP child (11,903) \$4.50 x 11,903=\$53,563.50 P-EBT only case monthly fee \$1.40 x 11,903=\$16,664.20 Existing SNAP (16,039 children) case that would receive P-EBT would be charged \$1.40 = \$22,455. Summary for FIS: 7,000 + 53,563.50 + 16,664.20 + 22,455 = \$99,682.70	\$99,682.70
Outreach (i.e. advertisements) -printing of notices, flyers, media campaigns, supplies, etc.	\$20,000.00
Total Cost Budget	\$ 474,465.82

4. P-EBT for School Children

A. Eligible Children

Guam Department of Education (GDOE) will identify participating schoolchildren who are eligible for free or reduced-price meals for the school year 2020-2021 using its existing Memorandum of Understanding with the Guam Department of Public Health and Social Services (DPHSS). All qualified students in the school meals programs will be eligible to receive benefits for any day where the school is closed or operating with reduced hours and/or attendance due to the COVID-19 mandated Health Emergency. GDOE conducts Direct Certification Matches on a monthly basis by directly downloading a listing of schoolchildren in SNAP households matched to each school districts Student Information System where student information is purged from the previous school year to the current school year, removing all students that have graduated, collect monthly attendance data from each school and are directly certified in GDOE's Child Nutrition Program (CNP) Statewide System that contains the demographic information for each student eligible for free or reduced priced meals and Community Eligibility Provision.

The two (2) districts participating in the school meals program are the Guam Public School (GDOE) District that operate under the Community Eligibility Provision and the Department of Defense Educational Activity schools which solicits school meal application for students.

The **Department of Defense Educational Activity schools** solicits school meal application for any incoming new students and does verification of school meal benefits if any categorical change in meal benefits for the National School Lunch Program and continues to accept new meal applications throughout the school year 2020-2021 from families where new determinations are made.

A Dynamic Query generated will pull existing data from the GDOE CNP Statewide System which will create a Listing of students eligible for a Pandemic-Electronic Benefit Transfer (P-EBT) Report that is converted to an EXCEL or CSV file that will be done manually and filtered to generate a list of all Eligible Schoolchildren who were Directly Certified (SNAP/TANF) or Default (Non-SNAP/TANF) based on Free/Reduce Priced meal applications to **DPHSS**. P-EBT benefits will be issued retroactively from August 24, 2020 through October 23, 2020 whereby 100% of **DoDEA schoolchildren** were fully virtual. DoDEA schoolchildren returned to In-Person Learning on October 26, 2020 having access to school meals and therefore will no longer be eligible for P-EBT benefits after this date.

GDOE will generate a Dynamic Query listing of eligible students for benefit issuance each quarter provided retroactively to ensure that full and accurate data is captured before issuing benefits. GDOE will request that the school districts provide any updates prior to the file being sent to DPHSS. In addition, all students including non-SNAP students at CEP participating schools will be eligible for benefits. A uniform process based on a simplifying assumption will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school based on the school closures or reduce attendance/hours due to Health and Safety requirements. P-EBT benefits will be issued retroactively from August 17, 2020 through May 24, 2021 whereby **GDOE public schoolchildren** were 100% fully virtual from August 17, 2020 to January 19, 2021 and on January 6, 2021, the GDOE public school district provided the results from a survey of schoolchildren registered for In-Person was at 22% at all 41 schools 1 day out of the week and 78% of the total enrolled public schoolchildren as predominantly Virtual Learning. GDOE Public Schools Student Information System is not designed to segregate In-Person and Virtual Learners for all students are considered as Virtual Learners. GDOE determined that due the district's antiquated system that its hybrid model would be 1

day In-Person and 4 days Virtual Learning.

GDOE will provide a Dynamic Query listing of students that is filtered by current SNAP participants matched with each School Districts Student Information System within the GDOE CNP Statewide System that determines which students are in SNAP (SNAP/TANF) that are Directly Certified households versus non-SNAP that are classified as (default) for Other Categorical (meal applications) provided by the School District. View Below (Sample Listing with Data Elements in bold).

(Pending Verification from GDOE if Student ID is part of the plan – currently student ID is one of the fields on the excel file /raw data file but not listed here)

StudentFirstName	FIRST
StudentMiddleName	MIDDLE
StudentLastName	LAST
StudentGender	FEMALE/MALE
StudentEligibilityStatus	FREE / REDUCED INCOME,
StudentEligibilityReason	GRACEPERIOD
EligibilityEntryComment	Import PEBT / Year Begin
StudentEligibilityStartDate	Eligibility
OriginatingStudentCaseNumber	Import # / CASE#
StudentSchoolCode	Elem/Mid/High
StudentSchoolName	School
CEPIndication	CEP/Non-CEP
Address1	PO Box/Street
City	City
State	State
PostalCode	Zip Code
BirthDate	MM/DD/YYYY
Guardian Name	Mother

DPHSS currently issues regular SNAP benefits on a staggered scheduled based on the Head of Household’s last number of their social security as follows: “1” -First day of the month, “2” Second day of the month, “3” Third day of the month, and so forth. To control the issuance of benefits to allow island stores and markets to provide sufficient stock of food items while complying with COVID-19 health and safety protocols to include social distancing.

The issuance dates are contingent on a finalized data element to be agreed upon by both **GDOE** and **DPHSS**.

The **first issuance** will be for August 2020, September 2020 and October 2020 will occur on or around **August 20, 2021** for SNAP participants and for non-SNAP participants.

The **second issuance** will be for November 2020, December 2020 and January 2021 will occur on or around **August 31, 2021** for SNAP participants and for non-SNAP participants.

The **third issuance** will be for February and March 2021 will occur on or around **September 18, 2021** for SNAP participants and for non-SNAP participants.

The **fourth and final issuance** of SY20-21 will be for April and May 2021 at which will occur on **September 30, 2021** for SNAP participants and for non-SNAP participants.

DPHSS's PHPro system will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP by cross-referencing the file against the data in PHPro across all public assistance programs to ensure all children are captured in the file.

DPHSS will issue a new P-EBT card to each student based on the demographic information regarding this group (P-EBT) and sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance. For SNAP and non-SNAP households P-EBT benefits will be based on the school meals Community Eligibility Provision or free or reduced priced school meal application. Guam does not mail out EBT cards, therefore P-EBT cards will be picked up by one of the parents where the school data provided by GDOE will be used as the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility, using up-to-date attendance data from the school districts identified in the GDOE statewide system.

Guam DPHSS and GDOE will work collaboratively in confirming eligibility when individual case questions arise. Additionally, DPHSS will seek the assistance of Guam Department of Education, Guam Department of Labor American Jobs Center (through their subsidized training program under the National Dislocated Worker Grant (NDWG)), and the Governor's Office of communication to field telephone inquiries related to P-EBT and collect data to share with DPHSS staff.

B. School Status

All Guam schools were closed due to the COVID-19 Pandemic Health Emergency the start of the school year 2020-2021 and did not report back until October 2020 for DoDEA schools and January 2021 for GDOE Public schools. In January 2021 GDOE Public Schools operated at reduced attendance hours, one day per week due to Health and Safety requirements limited to 22% capacity of the total enrollment. To ensure that the most accurate Student Information, GDOE will utilize the most accurate and updated student data uploaded in the CNP Statewide System to identify eligible students, this is done manually by each district. A demographic file created will come directly from the school districts to GDOE Child Nutrition State Office and then to DPHSS whereby benefits will be issued retroactively that captures information relating to the number of serving days on school closures and where a school experience reduced attendance or hours.

DoDEA School District (Eligibility based on Direct Certification and Categorical Meal Applications)

1st Quarter: **42 serving days**/August 24-31, 2020, September 2020, October 23, 2020

If Simplified Assumption of Total Average Days (1st quarter) $42/2 = 21$ Average Days

Due to the COVID-19 Health Emergency school closure and that all DoDEA students were 100% Virtual Learning with 47 (6 snap 41non-snap) students identified are eligible to receive benefits retroactively in the first quarter from August 24, 2020 through October 23, 2020 for they returned to in-person instructions on October 26, 2020 and had access to meals. All qualifying students will receive benefits based on **42 serving days** from August 24th through October 23rd, 2020 of retroactive and any newly eligible DoDEA student with an approved meal application or directly certified before October 23, 2020 will be issued P-EBT benefits retroactive based on 42 serving days.

For DoDEA, **August 24, 2020 to October 23, 2020** (1st quarter) will be retroactive for the **first and only issuance for 42 serving days from August 24, 2020 through October 23, 2020** whereby all DoDEA students were 100% virtual learning and on October 26, 2020 all DoDEA students returned to In-Person instruction with access to school meals and were no longer eligible for P-EBT benefits after this date.

GDOE School District [Eligibility based on Community Eligibility Provision (CEP)]

1st Quarter: August 17-31, 2020, September 2020, October 2020: **Total serving days for 1st quarter = 53 serving days**

2nd Quarter: November 2020, December 2020, January 1-15, 2021:
= Total serving days for 2nd quarter = 39 serving days

3rd Quarter: January 16-31, 2021, February 2021, March 2021
= Total serving days for 3rd quarter = 47 serving days times 78% fully virtual = 36.66 or 37 serving days

4th Quarter: April 2021 and May 1-24, 2021.
= Total serving days for 4th quarter = 34 serving days times 78% fully virtual = 26.52 or 27 serving days

If Simplified Assumption: 156 Total Serving Days / 9 months = **17.33 Average Days per month**

GDOE Public Schools remain closed for the 5 consecutive days each week as hybrid learners (hard-copy pick-up or virtual) due to the COVID-19 Health Emergency. The GDOE School District operates the Community Eligibility Provision under the National School Lunch and Breakfast Programs. All qualifying students will receive quarterly benefits of P-EBT based on the **number of serving days for the quarter**. The School District will be required to report to GDOE CNP State Office any significant changes and GDOE will share this information with DPHSS. Data collected monthly for August 2020 to June 2021 where benefits will be based on the number of serving days per quarter multiplied by the P-EBT rate determined by USDA that a student would have had access to meals if not for the school closure and are 100% virtually learning provided by the school district. Using this information, GDOE and DPHSS will account for any adjustment and assess impact on the statewide benefit amount. For example, if DPHSS finds that there is a significant disparity from one school or district as compared to other schools/districts, GDOE and DPHSS will assess whether an additional standard hybrid benefit amount is needed to ensure that they are accounted and work with FNS to adjust the benefit amount, as needed.

The months of August, September, and October (1st quarter) will be retroactive for the **first issuance** for **53 serving days** due to the Public Schools (GDOE) remained closed for the 5 consecutive days each week and where students are hybrid-learners (hard-copy pick-up or virtual).

The **second issuance** will be retroactive for the months of November, December, and January (2nd quarter) for **39 serving days** due to schools remained closed and the continuation of the Public Schools (GDOE) students as hybrid-learners (hardcopy pick-up and virtual) for the months of November 2020, December 2020, and **January 1-17, 2021**.

The **third issuance** retroactive for **37 serving days** for the months of January 19-31, **2021**, February and March were due to the reduced attendance hours one day per week due to Health and Safety requirements that limited each GDOE district schools to one day In-Person by cohorts with different groups of students 1 day of the week (e.g. Cohort A on Tuesdays, Cohort B on Wednesdays and Intervention) at 22% capacity of the total enrollment and 78% for 4 days Virtual Learning. The reduced number of hours or attendance is to comply with Health and Safety Requirements such as Social Distancing, Sanitization of schools and the limited amount of Protective Equipment and determined a hybrid schedule of one day In-Person and 4 days Virtual Learning out of the week.

The **fourth issuance** retroactive for **27 serving days** for the months of April to May 24, 2021 were reduced attendance hours one day per week due to Health and Safety requirements that limited each GDOE district schools to one day In-Person per week (e.g. Cohort A on Tuesdays, Cohort B on Wednesdays and Intervention) at 22% capacity of the total enrollment and 78% for 4 days Virtual Learning. The reduced number of hours or attendance is to comply with Health and Safety Requirements such as Social Distancing, Sanitization of schools and the limited amount of Protective Equipment and determined a hybrid schedule of one day In-Person and 4 days Virtual Learning out of the week.

5. P-EBT for Children in Child Care

At this time Child Care **will not** be included. Should additional funding be required for PEBT and become available or may be extended during the Summer or the next school year, modification to the date range covered of the current plan ensuring that Guam informs USDA of any significant increases or decreases in data points.

6. Benefit Levels

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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-2020-07-22/pdf/2020-15764.pdf>

GUAM plans to issue benefits in four quarters based on the number of serving days per quarter of the school year excluding all holidays, weekends, Professional Development Days and Parent/Teacher Conferences. Students will be issued benefits equal to the federal reimbursement rate for a breakfast, a lunch, and a snack for school year 2020-2021, as specified by USDA. The benefit is multiplied by the number of serving days that the eligible child did not have access to a meal at school due to school closure or reduced attendance or hours. In Guam, the daily reimbursement rate per-child benefit is **\$7.97** as the determined benefit amount for school closures or reduced attendance/hours. At the end of the first week

of each month, GDOE will share a listing of eligible students from each School District and determined the number of serving days per quarter and ensure that all students attending schools with reduced attendance and hours are issued a P-EBT benefit without having to collect data on a granular level (collecting every individual student’s specific attendance data each month). Calculating a standard hybrid amount that equates to would allow school districts operating in a hybrid model to categorize any student’s absent due to COVID as “hybrid”. These students will receive the full benefit amount to which they are entitled based on the number of serving days in which meals are not accessible when school is open (excluding Conferences, Professional Development, Holidays, and Vacations).

All qualifying students will receive quarterly benefits of P-EBT based on the **number of serving days for the quarter**. The School District will be required to report to GDOE CNP State Office any significant changes and GDOE will share this information with DPHSS. Data collected monthly for August 2020 to June 2021 where benefits will be based on the number of serving days per quarter multiplied by the Reimbursement rate determined by USDA for Lunch, Breakfast and Snack for a child who would have had access to meals if not for the school closure and are 100% virtually learning provided. In addition, school districts on a hybrid schedule where attendance is reduced 1-day per week by a percentage/Cohort the number of serving days are calculated based on Virtual Learning Days where students did not have access to school meals.

DoDEA School District (Eligibility based on Direct Certification and Categorical Meal Applications)

1st Quarter: August 24-31, 2020, September 2020, October 23, 2020: **42 serving days/2 or 21 Average Days**

GDOE School District [Eligibility based on Community Eligibility Provision (CEP)]

1st Quarter: August 17-31, 2020, September, October: **53 serving days**

2nd Quarter: November 2020, December 2020, January 4-15, 2021: **39 serving days**

3rd Quarter: January 19-29, 2021, February 2021, March 2021: 47 serving days times 78% fully virtual = **36.66 or 37 serving days**

4th Quarter: April, May 24, 2021: 34 serving days times 78% fully virtual = **26.52 or 27 serving days**

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

Day(s)	Activities
0	USDA approves the State’s plan
4	GDOE provides student data for August 2020 thru May 2021
20	Public notice, outreach to include social media/radio and talk show campaign begins. This also includes P-EBT 311 hotline currently used by the Communications department within the Governor’s office related to COVID-19 Pandemic.
30	Notices issued to SNAP and non-SNAP households
31-60	Issuance to new and existing P-EBT accounts and cards by schools, village Mayor’s office
61 - ongoing	Issuance to cases and any corrected payments.

Guam will continue to use the existing EBT card designs for all SNAP and Non-SNAP households. Guam’s PhPro Systems vendor will create a separate module strictly for P-EBT and will create a unique identifier to distinguish between regular SNAP benefits vs. P-EBT benefits (i.e P-1234) Guam will use the Student ID, which is unique to each child in each school and will avoid duplication of the issuance of benefits.

Guam currently operates regular SNAP benefits on a staggered schedule (Days 1-10) and will continue to use this same model. However, with P-EBT, Guam will issue out P-EBT benefits on the “anticipated” timeline listed below.

1 st Issuance for 08/2020-10/2020	August 20, 2021
2 nd Second Issuance for 11/2020 – 01/2021	August 31, 2021
3 rd Issuance for 2/2021 and 3/2021	September 18, 2021
4 th & Final Issuance for 4/2021 and 5/2021	September 30, 2021

Guam will continue to use the existing expungement rules for SNAP. DPHSS does not provide EBT cards via mail. Customers must physically pick up their EBT cards at the distribution sites determined by DPHSS. Therefore, we do not foresee any cards being returned via mail due to incorrect mailing addresses. Guam will continue with its current practice should replacement cards need to be issued. Additionally, this will be Guam’s first initial round of administering P-EBT benefits, so there are no existing P-EBT households. However, upon the implementation of P-EBT benefits, all eligible children identified by GDOE’s CNP will receive new P-EBT Cards to include NON-SNAP households. Should a P-EBT household no longer have their P-EBT cards whether it was lost, stolen, damaged etc., and we will continue with the current practice should it need to be replaced.

8. Customer Service

Guam is currently collaborating with the Governor of Guam’s communication department in establishing P-EBT as one of the options in the existing “311” Hotline which links to phone numbers of staff identified to answer inquiries. However, the 311 option cannot be accessed if calling from off-island. As a result, DPHSS listed the ten (10) phone numbers below. One of the options was to request assistance from Guam Department of Labor programs. DPHSS submitted a request to Guam Department of Labor to hire ten (10) clerical staff to assist with the call center. However, due to the lengthy recruitment process, we have identified staff within the Division of Public Welfare to assist with the P-EBT Call Center.

DPHSS P-EBT call center staff would have access to the P-EBT Module in order to answer particular inquiries that need to be verified on the P-EBT module and document their interaction/discussion on case notes as part of the module.

The (10) Call Center phone numbers are as follows and begin with area code 671:
735-7256, 735-7375, 735-7317, 300-8867, 735-7267, 735-7310, 735-7325, 735-7368, 300-7330, 474-7231.

Guam’s is unique that programs are very community oriented aligned with our cultural practice. Part of the outreach plan in “Getting the benefit to our people” will be:

1. Working directly with the village mayors, homeless shelters, Bureau of Social Services Administration (BOSSA) which houses Child Protective Services (Foster children) and local network providers in providing internet access at the location identified as a site for distribution for homeless children, children with limited English proficiency, households without internet access and people living with disabilities.
2. Guam will collaborate with GDOE and village mayors in identifying resources should translators be needed.
3. Guam will collaborate with Guam Transportation Authority in providing transportation especially with those living with disabilities.

Guam will initiate a public information campaign in collaboration with GDOE and the communication department within our Governor's office. We will utilize a variety of communication platforms such as:

- 1) Posting information and Q&A in DPHSS and GDOE websites
- 2) Printing flyers and broadcasting advertisements
- 3) Social Media
- 4) Sending out notices to those identified through GDOE.
- 5) create a response script to potential questions that staff may be asked.

The information provided to the public will contain the purpose of P-EBT, what are the qualifications, how will the household be notified, contact numbers to call for questions, how the amount was calculated, how the cards will be distributed.

Guam will provide as part of their Q&A information handout/flyer which includes "What to do" should they need to dispose of the card. They can also contact the P-EBT hotline for phone numbers to the issuance section.

Distribution of P-EBT Cards

Once the list between GDOE and DPHSS is generated displaying the parent's first & last Name, DPHSS will coordinate with GDOE in establishing distribution sites. We will distribute the P-EBT cards based on the Parent's last name (Head of Household) on designated days. For example, last names starting with S thru SANTOS will be distributed on Friday mm/dd/yyyy between the hours of 9:00am-7:00pm. **If needed**, we will coordinate with either the Guam Police Department or National Guard to assist with traffic control and to ensure parents are taking the necessary safety protocols for social distancing.

The reason for the distribution by parent's last name rather than by school, is to alleviate the parents having to travel on multiple days to pick up a P-EBT card when their children attend different schools when they can pick up the P-EBT cards for all their children, regardless of what school they attend, in one day at one distribution site. We will use forms of social media to include a press release posted in the Joint Information Center (JIC) and mailing out notices to the parents of eligible children.

Each P-EBT Card will have instructions (brochure) and will be given out to the parent.

All P-EBT participants will receive an information sheet (brochure) strictly related to P-EBT (upon issuance of the card) and will contain the following information:

1. Description of P-EBT
2. Instructions of establishing a PIN or changing a PIN.
3. Explanation of where P-EBT can be use.

4. The “Do’s and Don’ts” of using a P-EBT card
5. Explanation of violations and penalties with an indication emphasizing those benefits are non-transferable.
6. Instructions of returning or destroying the card should they decide not to utilize the benefit.
7. Information on contact information to address inquiries.

All the information will be available on websites, posters, and social media platforms.

9. Over-issuance of P-EBT benefits

DPHSS will outline a process to recover or adjust P-EBT payments to correct errors on previous issuances and **WILL NOT** apply their existing SNAP benefit claim process to P-EBT by developing P-EBT-specific rules and procedures and include those in the State Plan and consider the capability of the SNAP systems to distinguish P-EBT from SNAP benefits.

This process will take into consideration that many households received their benefits, without application, through an automated match process that relied on DPHSS 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, the State’s P-EBT plan will 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 DPHSS may attempt to recover benefits or reduce a future issuance. Under no circumstances may the DPHSS reduce a SNAP benefit to settle a P-EBT claim.

The recoupment of P-EBT benefits will be incorporated into the Bureau’s existing recoupment module, with a separate P-EBT program category code to distinguish this from other claim types. This will assist in clearly delineating the difference between regular SNAP recoupment versus P-EBT. 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.

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.

11. Administrative Funding

Guam will submit a separate grant to cover State level administrative costs associated with the administration of P-EBT that will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30, 2021. 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, the DPHSS 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 DPHSS SNAP State Agency's letter-of-credit until this plan is submitted and approved. The DPHSS 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 DPHSS 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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

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
Jon J.P. Fernandez, Superintendent of Education
Chief State School Officer
Guam State Agency Child Nutrition Programs

Signature

Arthur U. San Agustin, MHR
Director of Public Health and Social Services
Guam SNAP State Agency

Date of Request: _____