

**State Plan for Pandemic EBT  
Children in School and Child Care, 2020-2021**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
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<b>Replaces:</b>	N/A
<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

*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 should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.*

**State Plan for Pandemic EBT**  
**Children in School and Child Care, 2020-2021**

1. State: Idaho

- a. Idaho State Department of Education will be identified as SDE
- b. Idaho Health and Welfare will be identified as DHW

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

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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

*Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.*

- a. The *date range* covered by this State plan or amendment. August 2020 - June 2021. If Idaho schools are not back face-to-face learning in August/September this plan will be amended to cover P-EBT August and September 2021. Idaho will inform USDA of any significant increase or decrease in this information.
  - for children in school - August 2020 - June 2021
  - for children in child care – Not included in this plan submission
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Total estimated amount for schools is \$65,470,883.94
  - Estimated amount issued to school children in SNAP households.
    - Total estimated amount for schools is \$32,795,384.16
  - Estimated amount issued to school children in non-SNAP households
    - Total estimated amount for schools is \$32,675,499.78
    - Estimated amount issued to non-school children in child care Not included in this plan
- c. Estimated total *number* of children to which the State will issue P-EBT benefits. 126,153
  - Estimated number of school children in SNAP households
    - 63,192
  - Estimated number of school children in non-SNAP households
    - 62,961

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

- Estimated number of non-school children in child care – Not included in this plan
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- \$4,888,218.46
  - The budgeted amounts being requested are estimated costs only. A full budget will be submitted under separate cover for all estimated administrative costs following guidance received by USDA. USDA procurement and bid procedures will be implemented using 2 CFR 200. SDE reserves the rights to request and receive more USDA money if these estimates are too low. If additional funds are not approved, Idaho may need to work with FNS to modify deliverables in the approved plan in order to complete implementation of the 2020-21 P-EBT program. If USDA does not fully fund the request, the Idaho SDE does not have any additional funds to cover added expenses.
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households
    - Based on SDE and FIS' processing timelines and implementation plans, at this time we are estimating three benefit issuances beginning July 1, 2021, with issuances occurring every 30 days to cover the full 2020-21 school year. We also anticipate one additional issuance by the end of the federal fiscal year that will capture any case corrections needed.
  - School children in non-SNAP households – issuance dates for non-SNAP are the same as SNAP households
  - Children in child care – Not included in this plan submission

*Additional plan information can be found in Addendums 1 and 2 submitted with this plan.*

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<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

#### 4. P-EBT for School Children

##### 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 2020-2021, *or*
  - b. certified through submission of a household application processed by the child's school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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 2019-2020 graduates and other non-students.
  - The State agency will not use SY 2019-2020 data.
  - Using district's certified uploads of eligible children enrolled in SY20-21. The certified data will be received from the local SFAs throughout the duration of the program.
- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals? 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.
  - All Idaho P-EBT eligible students will be processed using the SDE developed software for this program's purpose. This includes SNAP, non-SNAP, public, non-public.
  - Determined SNAP participant children's information is uploaded from DHW into the SDE Direct Certification program (DC) which is retrieved by each district per USDA guidelines to track eligibility in their student information system. Direct certified students will be identified as such in the files submitted to DHW.
  - The SDE does not determine free and reduced status. Each child's eligibility for free and reduced is determined and certified at the local school district level.
- Once the SFA determines the status of the children for P-EBT, they

will upload a certified report into the SDE developed software. This software will be built using USDA P-EBT funds and will allow the districts to upload needed data elements in a secure process.

- We are assuming eligibility back to the beginning of the year no matter when an application is received per USDA guidance.
- This secure upload will provide the needed elements for all students (SNAP and non-SNAP) such as;
  - Child first name (soundex coded to Stephen can be matched to Steve, Steven, etc.)
  - Child last name
  - Student ID #
  - School Building number
  - Child date of birth
  - Child SSN if available
  - School District Name
  - School Name
  - Parent/Guardian first name
  - Parent/Guardian last name
  - Parent/Guardian date of birth (if known)
  - Parent/Guardian mailing address
  - City
  - State
  - Zip
  - Parent Contact Phone Number
  - Enrollment date (to determine if New or Existing)
  - Eligibility category
    - DC
    - CEP
    - F/R application (date approved)
- During COVID-19, a large number of families have not submitted an application to the SFA. This is because over 90 percent of our SFAs are serving free meals under SSO and SFSP. SDE will market the P-EBT program once the plan is approved. Until then, a limited number of families have submitted a Free/Reduced application. Outreach to families to submit an application will be promoted by the SDE and districts.
- How will the State confirm each child's lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
  - All Idaho P-EBT eligible students will be processed using the SDE developed software for this program's purpose. This includes SNAP, non-SNAP, public, non-public. The development of this software and the costs associated with the development of this program can be seen in the budget request.

- Schools will have to report their monthly schedule stating their predominant learning model (hybrid, virtual or in person) to align with the simplifying assumptions input into the developed software for P-EBT purposes. SFAs will be required to click a box that indicates the data being submitted to SDE is certified at the local level.
- 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.)
  - Every other month SDE will obtain the list of certified eligible students from the SFA with their enrollment date and application date to ascertain the benefits they will get retrospectively to ensure all students are properly accounted for. This will include the predominant learning model for each month.
- 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).
  - All Idaho P-EBT eligible students will be processed using the SDE developed software for this program's purpose. This includes SNAP, non-SNAP, public, non-public.
    - The SDE will work with schools to
      - obtain the certified individual school schedule reflecting the predominant leaning model.
      - obtain a certified list of the students and enrollment status
      - the certified student application approval date.
    - Using that data and the learning model reported, the SDE will calculate the benefits for the children using the following simplifying assumptions and send a monthly demographic and payment file to DHW per the included timeline, in a mutually agreed upon format. Since SDE will be going out to bid for the development of this software DHW has provided to SDE the needed file format for the RFI/RFP.
      - The learning model is the main driver for these two benefit assumptions. Each SFA changes their learning model frequency due to COVID transmission rate and will have to report their predominant learning model on a monthly basis.
      - Virtual, 5 times a week times \$6.82 (\$34.10 per child)
      - Hybrid, 3 days per week times \$6.82 (\$20.46 per child)
      - SDE would have each SFA enter their retrospective information into the software and report the learning model by school having each school report the predominant model.
    - DHW will work with FIS to issue benefits using the data file received from SDE.

- DHW provides SDE the FIS file formats and file templates for SDE to use to include children eligible for P-EBT benefits and to report changes in demographic and eligibility information.
    - SDE will create a unique identification number for each child for SDE/DHW to use to track P-EBT benefit payments paid to each eligible child.
  - SDE will work through DHW to resolve any issues related to erroneous benefit amounts issued and disputes regarding incorrect information inconsistent with school data submitted. DHW will work directly with FIS to expunge or supplement benefits.
  - The SDE will contract for a call center to accept calls and communications from parents with questions.
    - Escalation calls will be handled by staff at the SDE.
  - The SDE will maintain the P-EBT Web page and oversee any needed updates throughout the duration of the program.
    - Cost are reflected in the requested budget.
  - DHW will mail letters for SDE notifying families of their P-EBT benefit, how to access benefits and how benefits can be used.
  - DHW will send the file to the vendor to issue benefit cards.
  - DHW will submit reports to USDA as required.
- 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.

Out of the 164 total Idaho districts, 41.46% have 4-day weeks, however the total number of students in these districts only accounts for 15.42% of the total statewide students. Out of the total students 310,605 in the state of Idaho only 47,923 (or 15.42%) are in schools 4 days per week.

We surveyed SFAs in December and of the 137 responses from either food service directors or superintendents, and for those that reported 61 districts at the time were fully in person, and 61 had mixed learning models (hybrid, virtual and in person). SDE is proposing to use the most predominate learning model as the simplifying assumption.

The learning model is the main driver for the two benefit assumptions. Each SFA changes their learning model frequently due to COVID-19 transmission rates and will have to report their predominant learning model used on a monthly basis.

Virtual = 5 days a week X \$6.82

Hybrid = 3 days per week X \$6.82

SDE will have each SFA enter their retrospective information into the software and report the predominant monthly learning model by school. Those SFAs reporting a school as virtual, would give \$34.10 (\$6.82 X 5 days) per week; and those reporting a school as hybrid learning would receive \$20.46 (\$6.82 X 3 days) per week.

With Idaho's proposal, the larger districts are used as the main considerations for simplifying assumptions. Justification for SDE proposing these simplifying assumptions is based on 3% of SFAs accounting for 33% of Idaho students which currently have hybrid, virtual and in-person learning models. When the SFA is hybrid, they are in school 2 days per week and out of school 3 days per week. In addition, several Idaho SFAs not calculated in the top 3% also utilize these same learning models. For this reason, SDE feels confident using these statewide simplifying assumptions.

The SDE plan for simplifying assumptions is the predominate learning model which is the main driver for the benefit assumptions. If the predominate learning model is virtual, the school will identify this through their calendar and the student will be paid accordingly.

4-day weeks and 5-day weeks were calculated using the same assumption because it affects only 15% of the students. So far 40% of those SFAs on 4-day weeks have been in session since the beginning of the school year.

## 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.
  - SDE will receive certification data and information from each local school district that will identify, confirm and monitor the status of their individual schools. Because this information is not currently tracked at the SDE, schools will be responsible throughout the duration of the program to keep track of needed data elements, and send them to the SDE.



- 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?
  - Because the SDE does not collect these data elements, the state will use the information certified at the local school district level. Schools will have to report their monthly predominant learning model using the developed software for this P-EBT program.
- 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.)
  - SDE will obtain the list every other month from the SFA. SFAs must certify the data, before sending the list to SDE.
- 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.
  - SDE will monitor changes from the uploaded data from the local SFAs. Any changes reported from the SFAs will be recalculated for the P-EBT amount by the SDE.
- 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.

**School Status / eligible benefit days:** SFAs will identify and indicate the school status and eligible benefit days at each school participating in the NSLP/SSO/SFSP. SDE is proposing that in the development of the software a formula be added based on the learning modality at the school.

The learning model is the main driver for the two benefit assumptions (virtual and hybrid). Each SFA changes their learning model frequently due to COVID-19 transmission rates and will have to report their predominant learning model used on a monthly basis retrospectively to ensure data is accurate.

Virtual = 5 days a week X \$6.82

Hybrid = 3 days per week X \$6.82

SDE will have each SFA enter their retrospective information into the software and report the predominant monthly learning model by school. Those SFAs reporting a school as virtual, would give \$34.10 (\$6.82 X 5 days) per week; and those reporting a school as hybrid learning would receive \$20.46 (\$6.82 X 3 days) per week. This ensures data integrity.

With Idaho’s proposal, the larger districts are used as the main considerations for simplifying assumptions. Justification for SDE proposing these simplifying assumptions is based on 3% of SFAs accounting for 33% of Idaho students which currently have hybrid, virtual and in-person learning models. When the SFA is hybrid, they are in school 2 days per week and out of school 3 days per week. In addition, several Idaho SFAs not calculated in the top 3% also utilize these

same learning models. For this reason, SDE feels confident using these statewide simplifying assumptions.

## 5. 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 received SNAP benefits at any time since October 1, 2020.
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.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant 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?
- 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?
- 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.)
- 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).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

**Response:** This plan does not include P-EBT benefits for child care.

## 6. Benefit Levels

### *Standard for Benefit Levels*

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 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

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

#### 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>

- 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.

See previous sections for details and simplifying assumptions for student F/R eligibility and school status and meal service.

Benefits will be calculated by the Idaho State Department of Educations' developed software using a monthly retrospective time period utilizing the schools reported predominant learning model.

## 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.

- 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).

- Once the Idaho P-EBT plan has been approved by USDA and the SDE is provided with USDA funds for the projects below we will begin immediately working on the development of the needed resources.
- The timeline for Idaho will be challenging. SDE will be taking on the task of building a secure software application for the local schools to use and submit the required data elements securely to the SDE. The school districts will also be responsible for providing the predominant learning model and when that predominant learning model changes. With this information the SDE developed software will determine dollar amounts to be put on each individual child's P-EBT benefit card.
- In addition, SDE has been tasked with taking all phone calls, complaints and returned mail regarding P-EBT benefit cards. It has been determined by SDE that a call center would be the most efficient and customer friendly service.
- SDE will develop and maintain the Idaho P-EBT program website for needed changes throughout the duration of the program.
- Since these projects are time consuming and contracts will need to be processed, Idaho will provide updated timelines as we reach each milestone. Included is the tentative timeline.
- Timeline based on an FNS plan approval date of March 1, 2021
  - Day 30 – Governor Approval to receive and spend federal funds
  - Day 50 – FIS contract updated DHW needs to pay \$15k set-up fee and start FIS & CardPro development services  
FIS CardPro Development (3 weeks)  
Last day to confirm 7/1 payment issuance processing date (10 weeks lead time)
  - Day 60 - Last Day to confirm card stock order for 7/1 begin issuance date (4-8 weeks lead time)
  - Day 75 - test payment batch run
  - Day 105 -software developed and website goes live
  - Day 120 - SDE submits 1<sup>st</sup> payment filed to DHW
  - Day 130 – DHW processes payment file and submits to FIS
  - Day 131 – FIS begins processing payment file
  - Day 150 - SDE submits 2<sup>nd</sup> payment filed to DHW
  - Day 160 – DHW processes payment file and submits to FIS
  - Day 161 – FIS begins processing payment file
  - Day 180 - SDE submits 3<sup>rd</sup> payment filed to DHW
  - Day 190 – DHW processes payment file and submits to FIS
  - Day 191 – FIS begins processing payment file
  - Day 205 – DHW Receives final clean-up and correction file if needed
  - Day 218 - Final day to submit any PEBT transactions to FIS

- The timeline must include the State’s tentative issuance dates. In SY 2019-2020, 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.
  - Once the software is developed, SDE will provide DHW with a demographic and payment file for P-EBT benefit issuance.
  - FIS has committed to issuing a minimum of 5,000 cards daily with the initial month of issuance. We anticipate it will take up to approximately 25-30 days for card issuance.
  - For ongoing benefits, DHW will submit files to FIS within 10 days of receipt of the file upon receipt from SDE.
  - FIS will issue benefits to households within 5 days of receiving a benefit file.
  - DHW will review its current issuance schedule for regular benefits and emergency allotment supplements to determine the number of days P-EBT benefits will be issued. If feasible, we will issue P-EBT benefits using a staggered schedule.
  - Estimated timeline for issuances is detailed above. The same timelines will be used for both SNAP and non-SNAP households.
- 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).
    - Once the plan is approved and software developed, SDE will provide an estimated updated timeline as needed.
    - June 15 software developed and P-EBT hotline goes live,
  - Public notice campaign begins (Day #10), etc.
    - SDE website, press release, and outreach will begin once the plan is approved and software development is complete, estimated date:
    - June 15 software developed and P-EBT hotline goes live.

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?
  - To clearly differentiate between SNAP and P-EBT benefits, Idaho will issue P-EBT benefits for each child on a separate card for both SNAP and non-SNAP children. DHW will work with FIS to issue and re-issue cards to eligible P-EBT children.
  - 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 2019-2020. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.

- DHW will use a separate issuance code for all P-EBT benefits issued.
- 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.
  - All P-EBT benefits will be issued on a separate card so spend priority is not applicable.
- 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.
  - Benefits will be expunged following the same rules for regular SNAP benefits.
- During SY 2019-2020, 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?
  - EBT Processor destroys all returned cards. Customers will have the ability to obtain a replacement card from FIS once the customer information has been updated with the card vendor. EBT card mailers provide customers with FIS' customer service number. SDE will provide updated addresses to DHW in the monthly correction file so new cards may be issued to the correct address.
- Will you issue *new* P-EBT cards to existing P-EBT households? Yes
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
    - A separate card will be issued to both SNAP and non-SNAP children eligible to receive a P-EBT benefit.
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

## 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 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.
- 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.
    - The SDE will contract for services providing assistance and support to school families. Hot line personnel will be bilingual and/or be able to access interpretive services.
  - Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
    - The SDE will provide instructions and statewide training to SFAs on assistance to students with access issues. This will include the option to put a process in place for P-EBT benefit cards for homeless students to be mailed to the school district. SDE is working with their Title programs to inform their clients of this benefit.
    - Idaho's P-EBT plan will not require SSN numbers to establish eligibility or process payments.
  - 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).
    - The SDE will design and launch an information campaign in both English and Spanish for school age children's families. The public information campaign will be shared via:
      - Press Release
      - Social Media
      - Web-pages
      - Partner non-profits and hunger advocacy groups
    - Key information provided in information campaign:
      - Who is eligible for P-EBT benefits

- How can children get the P-EBT benefits
- 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.
  - Each school district will be responsible to communicate with the family and will have a field to indicate that the family is declining the benefit. DHW will provide SDE talking points for communicating with families that don't wish to receive a P-EBT benefit.
- 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 Spring and Summer of 2020, 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)

Information and preparation steps will be shared with Idaho SFAs in webinars.

Preparation instructions will include:

- Continue to identify and process F/R eligible students via direct certification and F/R applications.
- Conduct an outreach campaign to encourage families to ensure their current address is reflected in the school database.

School districts will send out communications to families. The following resources will be ideas for schools to use.

- Flyers
- Letter
- Sample social media posts
  - A description of P-EBT
  - Who is potentially eligible
  - How to receive/decline benefits
  - Where to learn more by linking to the SDE P-EBT webpage



Districts will be encouraged to use the communications methodology that works best for their community and to provide materials in the appropriate languages for the community they serve. Community partners will support schools in this effort by working closely with families in their community.

DHW will send a letter provided by SDE to each eligible child notifying the family of the P-EBT benefit amount and how to access/decline and use benefits on the EBT card that will be mailed separately from our EBT card vendor.

- 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?

As discussed earlier in the plan, all P-EBT benefits will be issued on a separate card. Idaho will reach both SNAP and non-SNAP eligible children through mailed correspondence.

## **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.

As the benefits will be issued retrospectively to qualified school children, over issuance of benefits is remote. Benefits will only be issued based on certified lists submitted by SFAs to those families classified as DC, those who applied for Free and Reduced benefits in qualified SFAs in SY20-21, those attending Provision 2 breakfast and lunch schools, and those in CEP schools. If incorrect information has been received by the SFAs, SDE will ask schools to update the information. SDE will submit correction files for cases of over issuances to DHW for review and any actions, if necessary.

Idaho will make all reasonable efforts to detect over-issuances and improper payments. When P-EBT benefits are disputed for any reason, SDE will identify the reasons and determine if benefits were issued incorrectly. Each case will be handled individually. If determined that the original P-EBT benefits were issued incorrectly, SDE will submit a correction file to DHW. If unspent benefits remain on the P-EBT card, DHW will expunge the remaining benefits and will send a letter notifying the family of expungement. Idaho will not reissue benefits in cases of disputed guardianship if the State believes the original issuance was correct. Claims will not be established, unless the state has sufficient evidence to show fraud was committed at the level established for referring cases for prosecution. Potential fraud cases will be pursued on a case by case basis. Idaho will provide notice to beneficiaries of the above circumstances in which Idaho may attempt to recover benefits.

#### **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, 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, 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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

**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 Idaho State Department of Education State Agency Officials:**



Signature  
Sherri Ybarra, Superintendent of Public Instruction

Shannon  
Brady

Digitally signed by Shannon Brady  
DN: cn=Shannon Brady, c=US, o=Idaho  
Department of Health & Welfare,  
ou=Division of Welfare,  
email=shannon.brady@dhw.idaho.gov  
Reason: I am approving this document  
Date: 2021.03.18 16:10:38 -0600

Signature  
Shannon Brady, Deputy Administrator (SNAP)

Date of Request: 03/18/2021

## Addendum 1

*Information submitted 3-10-2021*

Idaho State Department of Education responses in **RED**

Idaho Department of Health and Welfare responses in **Blue**

### Executive Summary

- At present, the P-EBT statute is only authorized through September 30, 2021. In the absence of an extension of the program, benefits must be distributed by the end of September.

The below information has been removed from our response in the attached revised P-EBT plan:

“SDE most likely will need an extension on the end date due to the time intensive activities in this proposed plan.”

### Cost Estimate

- We want to confirm that we understand Idaho’s cost estimate. Based on the figures provided, it looks like the state is assuming an average per student benefit of about \$41, which assumes about 6 virtual learning days per month ( $\$52 \text{ million} \div 126,000 \div 10 \text{ months}$ ). Please correct us if we misunderstand. For federal funding purposes, we request the state’s best estimate. This is important because USDA requests funding based on these estimates. Note that the state’s estimate will not limit the amount of benefits that Idaho may issue; the state will always have the chance to increase its estimate if necessary.
  - **UPDATED Amounts**
    - **The average per student benefit was increased to about \$52**
  - **SNAP Total \$32,795,384.16**
  - **Non-SNAP Total \$32,675,499.78**
  - **Total \$65,470,883.94**
  - **As further explanation, the learning model is the main driver for student benefit assumptions. Because each SFA changes their learning model frequently due to COVID-19 transmission rates, SDE would only have estimates at this time. Once final calendars are collected from all schools a more definite number could be provided.**
    - **If a student is in a hybrid predominate learning model for only half of a month, they will receive only half of the monthly benefit for an amount of \$40.92.**
    - **100% fully virtual students will receive \$129.58 per month for September through May. This is calculated on the number of school days throughout the state averaging 172.14 divided by 9 months equaling 19.156, rounded down to 19 days.**

- Partial virtual month will get a weekly benefit of \$34.10 per week, again if this is the predominate learning model at the school. As an example, for a partial month, 2 weeks virtual would receive \$68.20 and the 2 weeks in person would not receive any benefit.

## Eligible Children

- Will Idaho provide benefits back to the beginning of the school year for children who become eligible throughout the school year? We would refer ID back to question 14 of the [QA document](#) which says that if a child confirms during the current SY that they are eligible for NSLP, States and school districts may generally assume eligibility back to the start of the school year. Please address in your plan.

Based on the lateness of the plan and the software development, we plan on collecting enrollment entrance and exit dates with the student information in one data collection at the end of May-June timeframe. We are assuming eligibility back to the beginning of the year no matter when an application is received per USDA guidance.

This highlighted information has been updated in the attached revised P-EBT plan

## School Status

- On page 7, Idaho discusses schools with 4-day school weeks. We weren't clear if Idaho was proposing to issue benefits for children in these schools at the same level as children in 5-day-per-week schools. States may make simplifying assumptions in order to administer their P-EBT plans, but plan documents must describe why those simplifying assumptions are necessary and are based on the states' best feasibly available data. If separating the 4-day-per-week schools from the 5-day-per-week schools is not feasible, Idaho should provide additional information in its plan to document and support that.

Simplifying assumptions – 4-day weeks and 5-day weeks were calculated using the same assumption because it affects only 15% of the students. So far 40% of those SFAs on 4-day weeks have been in session since the beginning of the school year.

The highlighted information has been updated in the attached revised P-EBT plan

## Benefit Levels

- The plan says it will provide benefits every 30 days and that ID will be calculating weekly benefits. Please provide a short explanation of how ID will calculate its monthly benefit amounts. We assume that the benefit be prorated to account for the actual number of days in the month. A short explanation will make that clear.

- Will collect calendars from SFAs and calculate the monthly benefit amounts based on the learning model.
    - If a student is in a hybrid predominate learning model for only half of a month, they will receive only half of the monthly benefit for an amount of \$40.92.
- For all approved states, the number of days for fully virtual children is equal to the number of instructional days. Please confirm that Idaho's weekly model, would not provide benefits in excess of the number of instructional days over the course of the school year.
  - With the predominate learning model
    - 100% fully virtual students will receive \$129.58 per month for September through May. This is calculated on the number of school days throughout the state averaging 172.14 divided by 9 months equaling 19.156, rounded down to 19 days. With that said, the predominate learning model is the main driver for the simplified assumptions.
    - Partial virtual months will get a weekly benefit of \$34.10 per week, again if this is the predominate learning model at the school. As an example, for a partial month, 2 weeks virtual would receive \$68.20 and the 2 weeks in person would not receive any benefit.
- We understand that schools will report their predominant learning models for each month going forward. Please confirm in your plan that schools will also report separate predominant learning models for each of the months that have already passed. We assume that's the case.
  - Idaho State Department of Education is currently collecting this information by school.
- Idaho will determine benefit levels for each month looking backwards, and will reassess the benefit level at least every two months going forward.
  - We will issue retrospective benefits using only the actual learning model and will not be looking forward for any benefits. Currently a majority of schools are returning to in-person learning in March, which will make payments go down, however that is to be seen with the current transmission levels.
- On page 7, we believe that the paragraph that starts "We surveyed SFAs ..." is referring to setting an average benefit in schools with hybrid schedules. But some of us read the last sentence (that the state will use "the most predominate learning model [hybrid, virtual, mixed] as the simplifying assumption") to mean that the state will use a single learning model and benefit level for all children in the state. The rest of the document makes clear that benefits will be based on each school's predominant learning model, not a single statewide predominant model. Please confirm that we understand that correctly.
  - We will be using benefits based on hybrid, virtual and fully virtual students based on the calendar submitted for each individual eligible school.
- Since the proposal would provide the same benefit to all children within a school, it is possible that there will be some families who elect fully virtual schedules for their

children when the predominant model in the school is in-person or mixed. Some states are providing these families with a “reconsideration” process to claim benefits consistent with their children’s fully virtual status. Please address this one way or the other in your plan, the terms in your approved plan document is what the state will rely on to communicate with families if this issue comes up later.

- The SDE plan for simplifying assumptions is the predominate learning model which is the main driver for the benefit assumptions. If the predominate learning model is virtual, the school will identify this through their calendar and the student will be paid accordingly.

The highlighted information has been updated in the attached revised P-EBT plan

### Implementation Timeline

- It is unclear if Idaho developed its timeline in cooperation with the EBT processor and all relevant State agencies. If not, please make sure you do so. While we understand that you cannot do so with any new contractor who has not yet been hired, it is important that you discuss your plan, and proposed milestones with your EBT processor and all internal stakeholders.

Information in the submitted P-EBT plan, including the timeline, related to issuing of EBT cards, including system changes, card ordering and card issuance, and payment issuance is all based on information provided by FIS and built around the draft SDE timeline for project implementation.

- We have heard that some States have encountered challenges in implementing their P-EBT plans, after approval (due to lack of card stock, not providing processors enough lead time to do necessary work, etc.), because milestones in the original proposal (or the final revised version of the plan) were not realistic.

DHW continues to be in communication with FIS and will monitor timelines throughout implementation of the P-EBT program and adjust as needed based on changes in the timeline made by SDE and FIS.

- This is particularly important in your case, since you do not anticipate having your software ready before June, and because the end of your current proposed timeline is coming perilously close to the end of fiscal year 2021, and current legislation would prohibit obligation of P-EBT funds beyond September 30, 2021.

Once SDE selects a vendor and begins work on building the P-EBT system, DHW will begin work with FIS to establish a P-EBT code, any necessary system changes and ordering cards to begin benefit issuance as of July 1, 2021.

## Staggering Issuances

- On page three, the State indicates it will issue benefits every 30 days, with each issuance covering two months (starting with August and September). We appreciate the State's effort to split its issuance in this way, which will help avoid problems regarding Program integrity, straining the supply chain, and social distancing.

This section in the plan has been updated to reflect the timeline. Based on SDE and FIS' processing timelines and implementation plans, at this time we are estimating three benefit issuances beginning July 1, 2021, with issuances occurring every 30 days to cover the full 2020-21 school year. We also anticipate one additional issuance by the end of the federal fiscal year that will capture any case corrections needed.

The highlighted section has been updated in the attached revised P-EBT plan

- To further avoid the same types of problems, we encourage the State to consider staggering each of those monthly issuances across more than one day.

DHW will consider additional staggering based on adjustments needed to the current planned issuance schedule.

## Customer Service

- Please provide us with the phone number where we should direct any public inquiries that reach the National Office, once they are established.
  - Idaho State Department of Education is currently working on this. We will provide this information once we have acquired the number.
- In your description of information that will be provided directly to P-EBT participants, you indicate that you will provide a description of P-EBT, who might be eligible, and how to accept and decline benefits, and a link to a website where they can learn more. As you continue to prepare your materials for your public information campaign, we suggest that those materials (particularly those sent directly to participants) and the website also include all of the points below:
  - 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
  - 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).

Idaho State Department of Education is currently developing the website.



DHW will provide to SDE information to be used with customers and the public related how to use P-EBT benefits including: how to PIN the P-EBT card, where and how benefits may be used, and information related to integrity issues such as trafficking and the inability to gift benefits to anyone other than the person they are issued to.

- On page 16 the plan says that “DHW will provide SDE talking **points** for communicating with families that don’t wish to receive a P-EBT benefit.” Please make clear to families that benefits are not transferrable, and that a family that does not want the benefit should not use it or should (in the case on non-SNAP families) destroy their card.

Idaho DHW will provide SDE information to use to communicate how a family can decline benefits by destroying the card if they choose not to accept the benefits. The information will also make clear P-EBT benefits may not be gifted to any other individual or entity.

- At the bottom of page 16, through the bottom of page 17, the State seems to repeat some language. Please remove the duplicate language.

**Plan updated to remove duplicate content above.**

## Addendum 2

**From:** Matthews, Kristin  
**Sent:** Wednesday, March 17, 2021 2:42 PM  
**To:** Albert, Elizabeth (Libby) - FNS  
**Cc:** Stupi, Megan - FNS; Gonzalez, Jodi - FNS; Tobin, Charles - FNS; Ihm, Young - FNS; Vrabel, Stephen - FNS; Westling, Michelle - FNS; Stupi, Megan - FNS; Lewis, Pandora - FNS; Prestegaard, Holly - FNS; Cheung, Marisa - FNS; Tobin, Charles - FNS; Chew, GeNam - FNS; Davis-Montgomery, Chad - FNS; O'Brien, Kacie - FNS; Bourne, Jacqueline - FNS; Smith, Barbara A. - FNS; Saxton, Gregg - FNS; Nicholls, Steven - FNS; Latif, Sophie - FNS  
**Subject:** RE: Idaho P-EBT Plan for School-aged Children [External Email]

Hi Libby,

Please see our responses below in red. Let us know if you have any additional questions.

Kristin

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**From:** Albert, Elizabeth (Libby)  
**Sent:** Tuesday, March 16, 2021 10:26 AM  
**To:** Matthews, Kristin  
**Cc:** Stupi, Megan; Gonzalez, Jodi; Tobin, Charles - FNS; Ihm, Young - FNS; Vrabel, Stephen - FNS; Westling, Michelle; Lewis, Pandora; Prestegaard, Holly; Cheung, Marisa; Chew, GeNam; Davis-Montgomery; O'Brien, Kacie; Bourne, Jacqueline; Smith, Barbara A.; Saxton, Gregg; Nicholls, Steven; Latif, Sophie  
**Subject:** RE: Idaho P-EBT Plan for School-aged Children [External Email]

Good morning Kristin:

We are very close to approving ID's P-EBT plan. Could you please confirm the statements below.

Idaho has or will:

- developed software to collect student-level eligibility for school meal benefits and school-level predominant learning models (virtual, in-person, or hybrid) specifically to support P-EBT:
  - all public and private NSLP-participating schools will submit the information to their SFAs specific to each month of the school year,
  - SFAs will report the school-level information to the state every other month on a retroactive basis
  - All eligible schools will submit their data with enrollment start and end dates.
  - Idaho SDE is in process of developing a basic software program to accept data for the eligible schools. All schools will submit their demographic information one time in May and will have their retrospective benefit issuance amounts be submitted to DHW on a monthly file in 2-3 month increments.

- The SFA's have already started issuing their school calendars to the SDE and the Coordinators are calculating the monthly benefits based on the SFAs calendar.
- issue all school year 2020-2021 benefits in three monthly installments beginning in July 2021, . Idaho confirms we will be able to issue three monthly payments based on the timelines established in the submitted P-EBT plan.
- calculate benefits on a weekly basis for students with fully virtual and hybrid schedules:
  - students will receive 3 days of benefits for any week in a hybrid status, and 5 days of benefits for any week in a fully virtual status,
  - the maximum benefit in any month is 19 days, or the number of instructional days in the year divided by the number of benefit months,
  - Idaho SDE has determined that based on the calendars submitted that there will be one additional level of benefit for one day per week virtual benefit for those schools that have moved from fully hybrid to a one day per week hybrid schedule in anticipation of moving to fully in-person.
- set the state's average hybrid benefit based on a survey of SFAs representing a third of the state's students; the state will review updated schedule information from SFAs at least once more before the end of the school year and adjust its average hybrid benefit if necessary.
  - Idaho SDE has received most of the calendars from SFAs in Idaho and have determined that, to date, only 51 SFAs qualify for benefits at either all or a subset of their schools. Based on the calendars submitted we have added one additional level of benefit (see above)
- In the response to FNS' comment on Idaho's 4-day school weeks, ID responded that roughly 15% of the state's students attend SFAs with 4-day weeks, and about 40% of those SFAs have been operating in-person. That means that about 9% of P-EBT eligible children attend 4-day week schools. As we noted in our comment, the state must describe why simplifying assumptions are necessary. In this case, the question is why issuing pro-rated benefits for children in these schools is impractical. We assume the reasons are that the software that the state developed specifically to administer P-EBT has been designed to issue two levels of benefits, modifying the software to issue 4 levels of benefits for no more than 9% of children is not cost effective, that the changing nature of school operating schedules means that monthly benefits are imprecise by their nature, and that making an adjustment for the small number of students in 4-day schools would not meaningfully contribute to the precision of those benefits. Please confirm our understanding.
  - This was the best available data at the time the plan was written. We have adjusted for those SFAs only operating virtually one day per week to reduce their benefit to more accurately reflect actuals.
  - The basic software being developed will issue a monthly benefit amount to be paid to each student at a school. The software will not calculate the monthly amount now, the SDE will. This was determined after software quotes were received at the SDE to keep the cost of the programming development lower and less onerous for each SFA.
  - Based on the calendars currently submitted for four-day school week SFAs, only 19 schools qualify and most from the Aug-Dec timeframe. One hundred schools

do not qualify for any benefit and SDE is still waiting to hear from 18 schools on their schedule.

Thanks and please let me know if you have any questions.

All the best,  
Libby Albert

**Libby Albert**  
Chief, Integrity Branch  
Supplemental Nutrition Assistance Program  
Western Region

**Food and Nutrition Service**  
United States Department of Agriculture

