

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

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| Issuing Agency/Office: | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program |
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| Summary: | (1) This document is a template to assist states in the development of state plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2). |

Additional context and background for this document can be found at State Guidance on Coronavirus P-EBT: [Click Here](#)

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

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

1. State: IDAHO

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

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

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

Response:

- a. The date range covered by this state plan or amendment
 - **for children in school: Idaho will not issue P-EBT for school children for the 2022-2023 school year.**
 - **for children in child care: Benefit issuance will cover September 2022 through the end of the Public Health Emergency, set at May 11, 2023**

¹ The date range covered by P-EBT state plan or a amendment. A state's plan will typically cover the instructional months in the state's school year (September 2022 through June 2023, for example).

- b. Estimated monthly and total amount of P-EBT benefits the state will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households: **N/A**
 - Estimated amount issued to school children in non-SNAP households: **N/A**
 - Estimated amount issued to non-school children in child care: **Estimated using SY 2021-2022 CACFP percentage as the best information available: 19 days x \$8.18 = \$155 (full potential monthly benefit) x 28.45% = \$44 CACFP reduced monthly benefit x 9 = \$396 x 17,466 children = \$6,916,536**
- c. Estimated total number of children to which the state will issue P-EBT benefits.
 - Estimated number of school children in SNAP households: **N/A**
 - Estimated number of school children in non-SNAP households: **N/A**
 - Estimated number of non-school children in child care: **17,466**
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households: **N/A**
 - School children in non-SNAP households: **N/A**
 - Children in child care: **Benefits will be paid in a lump sum within 45 days of the end of the Public Health Emergency. A new EBT card will not be issued for P-EBT benefits.**
- e. Names of state agencies involved in administering this plan: **Idaho Department of Health and Welfare (DHW), SNAP Program.**

4. P-EBT for School Children (see Q&As #7-25)

A. Eligible Children

Standard for P-EBT Eligibility

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined "other source categorically eligible" for SY 2021-2022, **or**
 - b. certified through submission of a household application processed by the child's school district for SY 2021-2022, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. on the school's most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by a pplication **and** the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the state will identify eligible school children for P-EBT. Please describe separately for the subset of children enrolled in non-NSLP-participating fully

virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?² 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- 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).
- 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. *(Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.)*

Response: [please use as much space as needed] **Due to lack of resources that would allow Idaho’s State Department of Education to continue to participate with the P-EBT program for school children, the SNAP program, in a decision supported by Idaho executive leadership, will not submit a plan for school age children.**

² The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

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.
- 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?
- 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.)
- 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.

Response: [please use as much space as needed]

N/A

5. P-EBT for Children in Child Care (see Q&As #26-33)

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that is enrolled in SNAP in the benefit month.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

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

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

Response:

- **DHW will identify eligible children through our automated case management system (IBES). Each child's demographic information will be used to match to SNAP records to identify active SNAP households with children under 6. Individual child payments will discontinue the month following the month the child turns 6 years of age, or when the household SNAP enrollment ends or the May 11, 2023 conclusion of the PHE, whichever comes first. May 2023 payment will be prorated for 9 school days for any child eligible on May 1, 2023 or newly eligible from May 1 through May 11, 2023.**
- **As the best feasibly available data, DHW will set a monthly P-EBT child care benefit using the average of the reduction in pre-pandemic CACFP lunch vs. post pandemic lunch claims for the same period. See #6 below.**
- **DHW is the sole Idaho agency responsible for P-EBT for children in child care.**
- **DHW proposes a simplifying assumption by establishing a reduction in access to child care based on CACFP analysis showing that Idaho's child care system continues to operate at significantly reduced capacity across the state due to the COVID-19 pandemic. Using the CACFP simplified assumption is based on the Families First Coronavirus Response Act that all children under the age of 6 are deemed to be enrolled in a covered child care facility.**

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

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44³. The state will exclude at-risk lunches and adult lunches.

³ The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

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

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

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

- How will the state determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #30)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine those children’s eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
 - the child’s child care facility is closed or is operating with reduced attendance or hours, or
 - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the state will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

Response: [please use as much space as needed]

Idaho will establish a reduction in access to child care using the CACFP data method. Necessary months of CACFP data are not available at this time. Benefit amount will be calculated using actual CACFP percentages immediately prior to issuance date. Idaho will send the data, calculations, and benefit amounts to USDA prior to issuing benefits.

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

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

Notes:

1. Lunch rates include the 8 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

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

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the state propose? Why must the state make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

As the best available data for setting a standard payment, DHW will set a single monthly P-EBT child care benefit using publicly available lunch claim data for September 2022 through February or March 2023 (depending on what's available at the time of issuance) to calculate benefit amounts for the entire year using the average of the reduction in the pre vs. post pandemic school year CACFP lunch claims. Idaho averages 19 school days over the course of the month and will utilize the P-EBT benefit of \$8.18 per day.

| CACFP lunch claims pre-pandemic months | | CACFP lunch claims current school year months | | Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month. |
|--|---------------|---|------------|--|
| September 2019 | 143,052 | September 2022 | | |
| October 2019 | 164,187 | October 2022 | | |
| November 2019 | 129,465 | November 2022 | | |
| December 2019 | 122,945 | December 2022 | | |
| January 2020 | 145,007 | January 2023 | | |
| February 2020 | 141,751 | February 2023 | | |
| March 2019 | 143,023 | March 2023 | | |
| Total | 989430 | Total | TBD | |

| Child Care Calculation | Percent Change in CACFP Lunch Claims | Average # of School Days per Month | Number of Months in Semester | Daily Benefit Amount | Average Monthly Benefit |
|----------------------------|--------------------------------------|------------------------------------|------------------------------|----------------------|-------------------------|
| September 2022- April 2023 | TBD | 19 | 8 | \$8.18 | TBD |
| May 1- May 11, 2023 | TBD | 9 | 1 | \$8.18 | TBD |

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that states build their timelines from the date USDA approves the state’s plan (Day #0).
- The timeline must include the state’s tentative issuance dates. In past years, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP state agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.
- How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Timeline:

Day #0: USDA approves the state plan or 5/11/2023 PHE conclusion, whichever is later.

Day #1-30: Identify eligible children and implement electronic payment programming.

Day #31: Mail letters to eligible families

Day #45 – Lump sum payment to cover September 1, 2022 through May 11, 2023.

- **All funds will be distributed by September 30, 2023.**
- **P-EBT benefit will supplement regular monthly SNAP issuance on the household's current EBT card.**
- **P-EBT benefits will be assigned a distinct code to identify payments for reporting purposes.**
- **Draw/spend category is P-EBT first, followed by D-SNAP then SNAP.**
- **DHW will follow the same expungement rules the State currently follows for SNAP expungements, with one exception; we will notify households of how long they have to spend the benefits with the eligibility issuance notice.**
- **We will not issue separate P-EBT cards. EBT cards will be handled and reissued in the same manner as they currently are for the SNAP program.**

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 a actual and potential P-EBT households.

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

- How will the state resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the state's public information campaign. That is, the information you will provide to the general public (i.e., ***not directly*** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide ***directly*** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits

- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

- **Letters of explanation and eligibility will be mailed to affected households at least 10 days prior to benefit issuance.**
- **A phone number and email address are already in place to respond to questions, concerns, disputes and complaints regarding the P-EBT issuance. This process will continue to operate for the SY 2022-2023 P-EBT.**
- **Information related to this P-EBT issuance will be shared with our partners (Idaho Foodbank, Idaho Hunger Relief Task Force, etc.) via email and our regularly scheduled web meetings.**
- **Talking points will be shared with eligibility staff and external partners summarizing the period of eligibility as September 1 through May 11, 2023 to coincide with the end of the Public Health Emergency.**
- **Access issues to households that have since closed, as well as all other households with access issues, will be treated according to current regulations and process for all SNAP households with access issues. Our SNAP program already makes allowances for these access issues and since the payment is made to the EBT card there are no changes necessary to our process.**
- **These families are currently receiving or have received SNAP benefits during the period of eligibility. We will contact them via the most recent address on file. If families contact us, we will make accommodations to serve them as needed and as policy allows. For example, if the family no longer has an EBT card and contacts the Department, we will review demographic information and arrange a new card issuance with our EBT provider or issue a card directly through our regional offices, as most appropriate for the situation.**

9. Over-issuance of P-EBT benefits

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

states should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. states cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, states should develop P-EBT-specific rules and procedures and include those in their state plans. states must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the state's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a state's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. states that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the state may attempt to recover benefits or reduce a future issuance. Under no circumstances may the state reduce a SNAP benefit to settle a P-EBT claim.

Finally, the states recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold state agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your state will manage P-EBT payment errors.

Response: [please use as much space as needed]

As an automated payment to existing SNAP households, the possibility of over issuance of benefits is remote. This has proven true in prior P-EBT issuances, and we anticipate no changes to past successes in providing accurate benefits to eligible children. In the unlikely event an automation error is discovered that creates an overpayment which exceeds our established threshold, we will pursue claims based on Idaho's Claims Management Plan.

Claims will be established if the state has sufficient evidence to show fraud was committed at the level established for referring cases for an Intentional Program Violation. Potential fraud cases will be pursued on a case by case basis. Idaho will provide notice to beneficiaries of circumstances in which Idaho may attempt to recover benefits.

Utilizing the USDA provided spreadsheet, Idaho will inform USDA of all over issuances prior to taking action to recover benefits or reduce future payments to households in addition to reporting the reason for the error, the number of children affected, the dollar amount, and the corrective action taken to prevent recurrence of the same error.

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

A separate grant to cover state level administrative costs associated with the administration of P-EBT will be awarded to the SNAP state agency within each state, for the period of performance October 1, 2022 through September 30 2023. As the authorized grantee, the SNAP state agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP state agency, the SNAP state agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP state agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP state agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP state agency's letter-of-credit until this plan is submitted and approved. The SNAP state agency's Budget Plan should include the estimated administrative costs for all state agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance

Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

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
Shane Leach Administrator

Signature
Print Name and Title

Date of Request: _____