

**State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022**

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) 2021-2022. (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:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

1. State INDIANA

- 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).

Indiana has developed a plan for P-EBT childcare; however, USDA-Food and Nutrition Service (FNS) has informed us to hold this childcare portion of the plan for further review and confirmation by USDA/FNS.

- a. The *date range* covered by this State plan or amendment
- for children in school
 - for children in child care

Initial period will cover the quarter of July 2021 – September 2021. Subsequent issuances for SY 2021-2022 will be on a quarterly basis. Attached budget projections covers quarters through September 2022 including a summer P-EBT issuance.

- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment’s date range. *See attached budget that outlines projections for the period from July 2021 through September 2022.*
- 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 – *we do not differentiate the school children in SNAP and non-SNAP – total estimated school children per quarter is 140,000*
 - Estimated number of school children in non-SNAP households – *see first bullet*
 - 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).

¹ The date range covered by P-EBT State plan or amendment. A State’s plan will typically cover the instructional months in the State’s school year (September 2021 through June 2022, for example).

- School children in SNAP households – **estimated for first weekend in December 2021**
- School children in non-SNAP households **see first bullet**
- Children in child care:

4. P-EBT for School Children (see Q&As #6-24)

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 application **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. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)

Schools have been informed of the school eligibility requirements for P-EBT being based on the period of closure or reduced attendance or hours must meet the minimum 5 consecutive day threshold this school year. For this school year, we are transitioning to the new DOE system of record for school attendance. Schools and DOE are responsible for determining free/reduced lunch eligibility so if a student is added, the eligibility would be for the entire 2021-2022 school year. Most schools collected school meal applications from all households at the beginning of the school year as this allowed them to have updated eligibility for P-EBT. For the sake of clarification, children whose families submit applications sometime in SY 21-22 would become eligible for P-EBT from the point of application submission through

the end of the school year, but they would not be made retroactively eligible for P-EBT benefits prior to the date of application submission.

- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals²? 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.

The schools have been with the parameters for determining student eligibility for PEBT. Schools and DOE have been provided with the P-EBT school eligible requirements as well as student eligibility for NSLP and how to arrive at countable student days. Countable student days for P-EBT consideration would include for quarantines, other absences due to COVID related illness and approved virtual learning days for COVID related reasons. Schools have been informed that no other absences beyond this list would be allowable for P-EBT countable days. The following information is on the FAQ document to Schools: For students at home and engaged in academic programming 'virtually' (one-to-one device, packet pickup, course work emailed, etc.) due to any COVID reason, the Virtual Due to COVID attendance type is most appropriate. Both the Virtual Due to COVID and Virtual attendance types count as eligible days for determining PEBT eligibility if the student is enrolled at a school participating in the NSLP (National School Lunch Program). If the student is doing course work 'virtually' which may include one-to-one device without teacher participation, packet pickup, work emailed, etc., report Virtual Due to COVID. Students that may temporarily not be engaged in academic programming for absence due to having COVID, being quarantined or for any COVID related reason ARE also eligible for P-EBT benefits.

- 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.
This will be determined based on the schools' attestation that students did not have access to meals at school. This same procedure would apply regardless of public or non-public schools.
- 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.). The DOE database is continuously available to school staff for updating of student information.
- 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). Each of the schools and their respective school districts are responsible for confirming student eligibility for NSLP and P-EBT and reporting this information into the DOE database. The schools have been informed of the P-EBT eligibility requirements and are reporting eligible P-EBT days based upon these requirements. DFR staff are responsible for providing P-EBT policy and programmatic information to all partners. DFR also maintains communications with schools on eligibility requirements via the

² The burden associated with National School Lunch Program applications is covered under OMB Control # 05840026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

website, e-mails, and calls. DFR will continue to process the address change forms submitted by those whose children receive P-EBT and in turn we issue new P-EBT cards to the new address reported via Conduent EBT. Data warehouse is responsible for analyzing the data file received from DOE and communicating and confirming with DOE on any questions or concerns related to the data as DOE is the system of record. Conduent EBT receives the file from data warehouse and loads P-EBT benefits into accounts.

- 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.

Response: We do not plan to pursue any simplifying assumptions currently.

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.
As noted in responses above, schools have been provided the specific information needed on P-EBT eligibility both at school and student level. This information is collected through the new State DOE database system.
- 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? **Schools have been provided the specific information needed on P-EBT eligibility both at school and student level.**
- 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.)

Student information will be obtained from the new State DOE database in which all schools are required to report attendance information including any COVID related absences.

- 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.
DOE collects student information from schools on an at least monthly basis, so records are kept up to date and reflect the school status for any given 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.
Currently, we are not proposing any simplified assumptions.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

This section has been reviewed. We had reached out to FNS regional office on follow up questions we had on this section.

5. P-EBT for Children in Child Care (see Q&As #25-33)

Indiana has developed a plan for P-EBT childcare; however, USDA-Food and Nutrition Service (FNS) has informed us to hold this childcare portion of the plan for further review and confirmation by USDA/FNS.

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.

- 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? (See Q&A #29)
- 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 PEBT 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 childcare 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 how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
 - 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.

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 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs

Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

- 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: For the student P-EBT benefit, Indiana will issue student specific P-EBT benefit amounts for each month based on each student's number of approved virtual learning days and COVID related absences. Benefits are calculated for each month of the quarter but are issued on a quarterly retrospective schedule.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 SY 2020-2021, 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.

The State continues our consistent open communications between all partners which includes the State Department of Education, Data Warehouse and Conduent EBT. Thus, we will ensure that the proposed schedule of issuance be coordinated with all. Our current proposed plan would be for student P-EBT issuance to occur in mid to late November 2021. We are currently working on our file transfer from DOE through regular discussions, analysis, and testing. Through our past issuances, we know that Conduent EBT requires two weeks' notice for benefit upload at least for high volume files. We will work through these processes while this plan is under review and adjust where needed if approval pends into November. We do continue to have robo call ability set up for those receiving SNAP and the childcare P-EBT benefit so will use that to inform households once benefits are released. As well, our P-EBT website will be updated with information on current and future issuances.

As noted, we plan to issue the student P-EBT benefit covering the first quarter of this school year in mid to late November 2021 dependent upon plan approval. As noted in our budget documentation, we plan to issue quarterly and retrospectively for the remainder of this school year. Thus, we would project issuances to occur in November 2021, February 2022, May 2022, and July 2022.

Currently, we do not believe it is necessary to stagger or split issuances. This is primarily based upon the current estimates on students and benefit amount projected to be issued. The current per student average P-EBT benefit for the quarter July – September 2021 stands at approximately \$43. We will make every attempt to issue P-EBT benefits in between our regular issuance cycle for SNAP. As well, we are planning to communicate directly with the retailers and retailer associations once a date of issuance has been established. A continued concern with staggering and splitting issuances is the high potential for increases in inquiries to schools and DFR regardless of additional communications being provided to inform of the schedule.

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?
We will be issuing a unique P-EBT card in the name of the student.
- 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

2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.

The State has several sub-benefit types still available and thus plans to use one of the different types to distinguish P-EBT benefits from any others.

- 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. We agree that P-EBT will be the 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. The State will follow the same expungement rules that are currently followed by SNAP.
- During SY 2020-2021, 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?

For student P-EBT issuances, we are reliant upon the address reported by the household to the school. For those who have had an address change, schools and DFR staff receiving these inquiries will direct the household to our website for the change of address form and subsequent replacement card issued based on the report of change. A link to a form to report address changes continues to be available on our P-EBT website. These forms once submitted are received by the SNAP policy unit and new cards are sent out where needed.

- Will you issue *new* P-EBT cards to existing P-EBT households? No ○ 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? See response in previous bullet

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 from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential PEBT 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 DOE database allows for help desk tickets to be submitted by schools. For those schools who have questions concerning overall P-EBT eligibility requirements, a ticket can be submitted that will in turn be sent to SNAP policy for clarification. Individual student eligibility and number of days is determined by each school through their submission and thus would have to be problem solving on the school side. Should there be a missed student(s) identified, this can be remedied in a future P-EBT issuance.

- 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.

We have not encountered any issues in past P-EBT issuances with any of the populations noted above. We support Section 508 ADA compliance requirements.

- 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 State P-EBT website will be updated with the new school year benefit information. This includes updates to the FAQ's and benefit schedules. As noted previously, we plan to continue posting the form for address changes on the website.

- 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.

This information is contained on the buck slip with the P-EBT card noting that if do not wish to use the benefits then the card should be destroyed. We will work with our communications team to enhance our communications with households through better informing of our P-EBT website and through social media.

- 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: Most of the information noted in the bullets above will be provided via the buck slip included with each card. The buck slip also includes the reference to our P-EBT website for further information. The buck slip information is also available on our website. As well, we will provide all the above-mentioned information to DOE so this can be passed on to all schools for their reference when receiving inquiries. With the reduced eligibility and amounts anticipated for this school year, we do anticipate more eligibility inquiries. We do believe that we are sufficiently staffed to handle the inquiries, but should there be a large influx of inquiries, we do have some staff (up to 20 additional) that could be assigned to this project for the short term to assist with inquiries. Schools would be the primary source of individual student eligibility and DFR will assist with any policy interpretations and address change/replacement card concerns received.

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.

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

Response: The State confirms that we will not attempt to reclaim P-EBT benefits by reducing a household's SNAP benefit. Since P-EBT benefits are unsolicited benefits to many of the families receiving, the State does recognize that efforts must be taken to communicate and attempt to rectify questions and concerns. The State will research cases that come to our attention where perhaps custody recently changed such as guardian or custodial parent changes. Should this specific situation occur, and the benefit has already been spent, there is no further recourse available. If the benefit has not been spent, we will be able to re-issue a P-EBT card for the child.

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, 2021 through September 30, 2022. 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 ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

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:

Adrienne Shields, Director, FSSA/Division of Family Resources

Dr. John Keller, Chief Information Officer, Indiana Department of Education

Date of Request: October 7, 2021