

**State Plan for Pandemic EBT: Children in School
School Year 2020-2021**

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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 school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
Disclaimer:	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.

Additional context and background for this document can be found at:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

State Plan for Pandemic EBT: Children in School
School Year 2020-2021

1. **State:** Massachusetts
2. **Primary Citations:** Families First Coronavirus Response Act;
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*¹ covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. 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

Response:

Massachusetts proposes to build off its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from October 1, 2020 through September 30, 2021.¹ The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

To date, approximately half of the students in Massachusetts are in hybrid learning model while the rest remain fully remote. A very small number of schools are operating in-person. These approximations have informed the estimates below;

Monthly issuances of \$45,820,922.20

o Estimated monthly amount issued to school children in SNAP households is \$19,575,095.60

¹ Estimates provided in this plan amendment are not applicable to August or September 2021 as these months are part of a separate school year and data to inform estimates for those months is not yet available. The state will notify FNS should we proceed with P-EBT for SY21-22 and provide the associated estimates

o Estimated monthly amount issued to school children in non-SNAP households is \$26,245,826.60

Total issuance of \$412,388,299.80 (monthly estimate multiplied by the nine months remaining in the 2020-2021 school year)

o Estimated total amount issued to school children in SNAP households is \$176,175,860.40

o Estimated total amount issued to school children in non-SNAP households is \$236,212,439.40

The estimated total *number* of children to which the State will issue P-EBT benefits (based on spring 2020 figures) is approximately 521,284.

o Estimated number of school children in SNAP households is 222,697 (**estimated** 111,348 in hybrid; 111,349 in fully remote)

o Estimated number of school children in non-SNAP households is 298,587 (**estimated** 149,293 in hybrid; 149,294 in fully remote)

The state intends to issue P-EBT benefits retroactively by the 25th of the following month for all eligible recipients.

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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- 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.

- 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.
- 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.).
- 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).

Response: [please use as much space as needed]

The following entities are involved in the administration of P-EBT:

- The Department of Transitional Assistance (DTA) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.
- The Department of Elementary and Secondary Education (DESE), in collaboration with the local school districts, is responsible for eligibility determination through the direct certification process, the NSLP application process and the monitoring and collecting of student learning mode classifications.

To identify eligible school children and confirm their eligibility, Massachusetts will use data provided by the school districts directly. DESE will instruct school districts to provide the agency with a list of all students eligible for free or reduced-price meals. This list will be developed using the SY19-20 list of free and reduced-price eligible students as its base.² DESE will also instruct the districts to remove students who have graduated or moved out of district from this list and add students newly eligible by way of direct certification (SNAP recipients), other categorical eligibility sources or via the SY20-21 National School Lunch Program (NSLP) approved household applications (non-SNAP recipients).

A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school. Public school districts are required by the state to track a student's learning mode (i.e. remote, hybrid or fully in-person). For the purposes of P-EBT, private schools who administer NSLP will be required to track a student's learning mode and provide that information to DESE. A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. The state intends to leverage simplifying assumptions to issue two benefit amounts, one amount for hybrid students and one amount for fully remote students (more details are provided in the Benefit Level section).

² Most public-school districts are implementing the Seamless Summer Option (SSO) or the Summer Food Service Program (SFSP). Per USDA FNS Q&A Memorandum released on October 14, 2020, the eligibility carryover period is paused during SSO/SFSP operations allowing SY19-20 student eligibility to be used for SY20-21 P-EBT eligibility. Districts operating NSLP will be instructed to use their SY20-21 eligibility list.

The state plans to issue P-EBT retroactively in one-month increments. DESE will request the districts to provide any updates to a child's learning mode no later than the 10th of the following month.

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 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.
- 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]

Massachusetts will identify, confirm and monitor the status of individual students through monthly reporting from school districts to DESE. DTA and DESE will provide guidance to each district on how to classify and report a student's learning mode. The majority of school districts that were confirmed P-EBT eligible through the approval of our September 2020 P-EBT plan have still not resumed fully in-person instruction. At the time of this plan submission, there are only three public school districts operating fully in-person and an additional 28 individual public or charter schools operating fully

in-person.³ Districts or schools operating fully in-person will have eligible students if they meet the following criteria:

- Students who opt into fully remote learning (classified as “remote” for the purposes of benefit calculation), or
- Students who are absent from school due to COVID-19 (classified as “hybrid” for the purposes of benefit calculation).

Massachusetts schools track the learning mode for each student (fully remote, fully in-person or hybrid) and attendance records. All students in a fully remote or hybrid learning mode (inclusive of the in-person exceptions listed above) will be eligible for P-EBT. Schools will submit this information via a data file to DESE. Massachusetts schools also track any changes in each student’s instruction mode so that DESE will receive up-to-date information in the monthly data files.

Please see the state’s intended use of simplified assumptions outlined below in the “Benefit Levels” section.

C. 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 and a lunch 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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

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.

³ These figures do not include private schools. The state is working with private schools to assess their learning mode.

Response: [please use as much space as needed]

In an effort to structure the program in a way that is easier for the school districts to handle and more easily communicate to clients and stakeholders, Massachusetts intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct amounts, one amount for students enrolled in a fully remote learning mode (inclusive of students whose school district is operating an in-person or hybrid model but the family opts into fully remote learning) and one amount for students enrolled in a hybrid learning mode (inclusive of students who are absent from an in-person learning model due to COVID and the need to quarantine).

The fully remote benefit amount will be calculated using an average of 20 school days per month. On average most students are in school for 20-22 days per month, so Massachusetts believes using 20 days to inform the fully remote amount is reasonable. This allows the state to issue one consistent benefit of \$117.20 per month, mitigating household confusion and thus reducing inquiries to DTA’s assistance line.

To calculate an average hybrid benefit amount, Massachusetts completed a statewide survey to capture which districts were operating a hybrid model and what type of model was being utilized. The survey asked districts to provide intel related to the weeks of November 2nd and November 9th. Overwhelmingly, the two most common models being utilized are the “week on/week off” approach and the “two days in school three days out of school” approach. Some schools within a district and some smaller districts are employing different hybrid models but the number and impact to the statewide average was negligible.

Using this intel the state completed an exercise assessing how many days were missed for each model for each month remaining in the school year and how many holidays and vacations to consider. Please see the numbers that were used to calculate an average hybrid benefit amount below. As evident by the table below, the statewide average was 9.2 days in which the state rounded up to 10 to account for ease in communication and understanding across clients, field staff, school districts and stakeholders. Based on this logic Massachusetts proposes the hybrid benefit amount equal \$58.60 per month, the equivalent of 10 days of missed school.

Model	Total Days Missed per month	Average per month (accounting for holidays)
Week On / Week Off	12.89	10.33
Two in / Three Out	10.78	8.22
Holidays		2.56
Total Average Statewide	11.8	9.28

To ensure that modifications to hybrid learning models that could impact the averaged hybrid amount are accounted for Massachusetts commits to;

- collect schedule data from school districts no less frequently than every other month for the remainder of the school year,
- use schedule data collected from school districts to set or adjust average benefits for each remaining two-month period in the school year for children with hybrid schedules; if justified by the data, Massachusetts will modify the single statewide average benefit for these children, and

Massachusetts is using its experience in administering P-EBT earlier this year to better inform its strategy. The requirement to calculate the exact number of days each child missed led to confusion in implementing the September P-EBT payment. School districts reported significant challenges in tracking and calculating the number of P-EBT eligible days. Variations in hybrid models was the primary contributor to this confusion. Many districts employed different hybrid schedules in different schools within their districts. This led to inconsistencies in administration within and across districts.

To account for the fluid nature of the pandemic and that a student's status may change mid-month the state will be issuing benefits retroactively for the previous month using the learning mode that the student is enrolled in for the majority of that month. Furthermore, for students who become eligible for P-EBT mid-month the learning mode they were enrolled in for the majority of that month will inform their benefit amount.

5. 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).
- 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.
- 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 SY 2019-2020. 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.
- 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?
- 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]

It is Massachusetts' goal to issue October and November 2020 P-EBT benefits in December. The feasibility of this will depend on the date of plan approval. The state may need to change the issuance schedule depending on when the plan is approved and how the timeline intersects with the December holidays. The tentative approach is as follows:

Day 1 – Plan approval is received.

Day 2 – Inform school districts of the reporting criteria and submission instructions.

- Discussions have been occurring with school districts in November on how to filter their lists appropriately (i.e., reconciling lists used in September with new direct certification or school meal approvals).

Day 10* – Deadline for school districts to submit files.

Day 20* – File transfers to EBT processor Conduent, notice production begins and public awareness campaign commences.

Day 25* – Benefits available on cards and clients are notified via text message.

Note: 3-5 days may need to be added to these dates based on weekend and holiday schedules.

For ongoing issuance between January and June 2021, Massachusetts intends to issue P-EBT benefits monthly on a retroactive basis. Beginning in January, by the 10th day of the month, all eligible school districts will provide the state with the necessary data to issue P-EBT. This data includes a list of students eligible for free and reduced-price meals and their respective learning modes. If a child or school has changed its learning mode mid-month the school will provide the date the change was made. The goal is to issue the P-EBT benefits by the 25th (15 days after receiving data from the school districts). This allows for the

necessary data clean up and file transfer to the state's EBT processor, Conduent. Massachusetts issues SNAP benefits on a cyclical schedule, issuing on the 25th of the month allows for us to conclude our monthly issuance cycle.

The state intends to follow the same distribution model utilized in previous iterations of P-EBT. DTA households will receive their P-EBT benefits on their EBT card while non-DTA households will receive benefits on a unique P-EBT card. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. New P-EBT cards will not be issued to families who have already been previously issued a P-EBT card. For families whose card has been lost or damaged, DTA has developed an online replacement card portal and DTA is also accepting replacement card requests via its assistance line. The state will continue its use of the F9SS benefit code which was modified specifically for P-EBT. Currently the P-EBT draw/spend priority is last behind D-SNAP and SNAP. The state recognizes FNS' recommendation that P-EBT be listed first in the draw/spend hierarchy and will work with Conduent to assess what would need to happen to make that change. Undeliverable cards will be returned to Conduent who will in-turn provide the state with this information. This information will be shared with school districts for outreach purposes (see proposal below in the "Customer Service" section).

6. 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.
- 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.
- 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 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)
 - 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]

DTA has a multi-faceted approach to ensuring robust and accurate communication to all eligible households regardless of primary language, lack of permanent address or access to technology. DTA's Assistance Line will continue to serve as front line customer support. To aid field staff in assisting callers, DTA has added a P-EBT page into its BEACON eligibility system to allow field staff to specifically investigate a child's P-EBT eligibility, benefit amount and card issuance status. Additionally, a specific email/inbox was created internally at DTA where field staff may forward issues when they cannot easily be resolved. A dedicated team will monitor this inbox and problem solve issues utilizing the records provided by the school districts. In instances where DTA is unable to locate a child in their records, the family will be referred to their respective school districts where issues of eligibility can be more easily determined.

DTA and DESE are committed to equitable access for all eligible families regardless of circumstances. The two agencies are currently working with each school district's homeless liaison to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. School districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement. Families will need to sign an attestation that they received the card and at the end of the school year the school district will be required to submit to DTA the signatures and any cards that were not picked up. DTA will continue the collaboration with the Department of Children and Families (DCF) that was established during the first round of P-EBT informing DTA of address/location updates for foster children. Collection of social security numbers (SSN) are not necessary to apply for NSLP, therefore children without SSNs may pursue eligibility for P-EBT through a NSLP applications.

The state is also committed to serving all eligible children regardless of primary language. In the spring the state stood up an independent P-EBT website, MAp-ebt.org that is available in eight languages. Furthermore, all outreach materials have been translated into eleven languages. These materials will be shared with school districts to distribute to their families.

Public Awareness Campaign: The state will conduct a public information campaign through use of websites Mass.gov/p-ebt and MAp-ebt.org and social media platforms. Massachusetts intends to issue a press release in English and Spanish to target state-wide and local news organizations and Senior Leadership will announce at a press conference. The state will work

with schools and community organizations to push out template emails, robo-calls and texts and flyers

Direct Communication: For the first issuance all eligible P-EBT children will receive a notice similar to what was sent in the spring and in September that will direct them to MAp-ebt.org or DTA's Assistance Line. The notice will include an explanation of P-EBT generally, eligibility for the program, benefit amounts, issuance cycles, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions and how to opt out. For newly eligible children, the notice will also include information on where to go for step-by-step instructions on how to PIN their card and what to do if they do not want to use the benefits. The notice is available in English and Spanish and is accompanied by DTA's translation card comprised of twenty languages. DTA is also actively working on an informational video in American Sign Language.

Similar to the spring and September issuances, DTA will create flyers, template robo calls/text/email language and sample social media posts and graphics in multiple languages. This is all housed on MAp-EBT.org. These outreach materials will be shared with schools, community organizations, and sister agencies. DTA tracks P-EBT card pinned rates by city and town and will use that data to continue partnering with school districts who have high rates of unpinned cards which may indicate that families are having trouble accessing their benefits.

As mentioned earlier, DTA has built a replacement card portal on its DTA Connect website. Included on this website are instruction on how to PIN a P-EBT card and request a new card. This information is available in five different languages. DTA has collaborated with its EBT processor, Conduent, to frontload a P-EBT specific message on their pinning hotline.

SNAP specific: P-EBT eligible households who also receive DTA benefits will receive a text message when benefits are issued, letting them know to check their balance.

7. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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.

Response: [please use as much space as needed]

Massachusetts has many lessons learned from administering P-EBT over the last eight months and believes utilizing the most up-to-date information available is essential to avoiding incorrect issuances. One example of this is outlined above in the explanation of partnership

between DTA and DCF which ensures the most up-to-date information is used in the issuance of P-EBT benefits to foster children. Extensive time and resources have been committed to updating and correcting incorrect addresses. The state intends to use these updated rosters and ensure that old addresses do not override the updated ones during the data exchange and reconciliation process. The state remains committed to utilizing all available resources to research and resolve issues related to custody concerns including the continued use of DTA's fraud unit to investigate claims of incorrect issuance.

8. 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.

9. 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.

10. 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.”

11. 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.

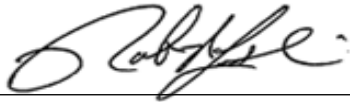
12. Administration of State P-EBT Plan

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
Brittany Mangini, Director of Food Security and Nutrition Programs
Department of Transitional Assistance



Signature
Print Name and Title

Date of Request: December 8, 2020