

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022
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<b>Summary:</b>	(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: **Minnesota**

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*<sup>1</sup> 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

**Response:**

- a. Date range of plan
  - **For both school and child care children - September 1, 2021- August 31, 2022. Benefit eligibility will begin on 9/1/21 in accordance with the state's P-EBT eligibility calendar and coincide with the 9/3/21 end date of the summer benefit period.**

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<sup>1</sup> 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).

- b. Total amount of benefits (assume less days of total eligibility due to shortened distance learning/quarantined time periods) *See table below*

Similar to P-EBT 2.0 operations, Minnesota will not be disaggregating school children receiving SNAP and those not receiving SNAP. All P-EBT school based benefits will flow through one process and data management process.

Minnesota is assuming the total children served in P-EBT 3.0 will equal 65% of the total children served during the 2021/2022 school year. Because schools are making every effort to keep students in school, we anticipate the benefit totals will be reduced to 50% of the P-EBT benefits issued through August 2021. Minnesota experienced a surge in COVID cases during September and October yet schools have remained largely in person and with fewer quarantine requirements due to COVID exposure. The statewide peacetime emergency has ended in Minnesota and local school districts are no longer required to submit to MDE detailed information about adjustments due to COVID which limits our ability to estimate with certainty how many students will be served and the amount of benefits that will be issued during the 2021/2022 school year.

Minnesota is estimating that 90,000 children 5 and under in SNAP eligible households will receive a P-EBT Child Care monthly benefit of \$30 for up to 9 months, for a maximum total issuance of \$27,540,000.

2021/2022 estimates	School based P-EBT	Child Care P-EBT
Students/Children	201,187	90,000
Dollars	\$186,400,000	\$24,300,000

- c. Estimated total *number* of children to which the State will issue P-EBT benefits. *See table above and question#5 below.*

- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

Eligibility	Issuance
<b>Phase I: School closure impacts identified</b>	
September – October impacts	~ November, 2021
<b>Phase II: Data uploads from Schools</b>	
September 2021 – December 2021	February 2022
January 2022 – May 2022	June 2022
June 2022 & Summer 2022	July or August 2022*

\*This will include a “catch-up” opportunity for any missed students. Schools will be reminded of the opportunity to capture any missed students via personal calls, emails and other technical assistance tools.

- Summer benefits planning will be finalized once USDA releases guidance

Tentative P-EBT Child Care issuance schedule (the dates on which you will issue P-EBT benefits).

Eligibility period	Issuance

<b>Phase I: Child Care Eligibility retro issuance</b>	
<b>September 2021 – December 2021</b>	<b>~ June 2022</b>
<b>Phase II: Spring Data Analysis</b>	
<b>January 2022 – May 2022</b>	<b>July 2022 or August 2022</b>

\*January through March 2022 CACFP data will be averaged to determine monthly benefits for January through May 2022.

#### 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.*)
  - **Overall, MDE will have a two phase process:**
    - i. **To initiate benefits as quickly as possible, MDE will**
      - **Direct schools that have closed their entire building due to COVID impact enter into the portal the number of days of impact. MDE will use most current FRP eligibility data available.**
    - ii. **Initiate an enhanced SY 21-22 portal from previous year to support P-EBT 3.0 needs. To the extent possible, will replicate as much of the P-EBT 2.0 Portal as possible**
      - **Direct schools to collect applications for educational benefits for SY21-22 to identify students that qualify free and reduced eligibility.**
      - **Track CEP and Provision schools to list student eligibility.**
      - **Use direct certification to identify eligible students.**
      - **Ask schools to collect COVID related impact instructional days.**

- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals<sup>2</sup>?
  - **The state will only use SY 20-21 free and reduced price status to issue P-EBT benefits through October (roughly in line with a normal school year’s 30-day carryforward period). For November forward, children will only receive P-EBT benefits if they have been certified for free or reduced price meals through direct certification or on applications submitted since the start of the current school year.**
  - **For schools, only students enrolled in NSLP eligible schools will be eligible for benefits. No students enrolled in non-NSLP eligible virtual or other non-NSLP schools will be granted benefits. Next, we will use the standard verification process. Schools will approve SY21-22 applications according to standard procedure and report the students in the Minnesota Automated Reporting Student System (MARSS).**
- Please describe separately for SNAP-recipient and non-SNAP-recipient children.
  - **Minnesota will have one process for identifying eligible children and students and issuing benefits. There will not be separate processes for SNAP and non-SNAP recipients.**
  - **Children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.**
  - **Similar to P-EBT 2.0, schools will enter data and it will reconcile with the MDE system (MARSS) for enrollment and f/r eligibility.**
- How will the State confirm each child’s lack of access to meals at school?
  - **Schools will enter their COVID impacted closures into the P-EBT 3.0 Portal. They will provide actual information for both students impacted and number of days a school or classroom closed.**
  - **We will use the following definition provided by USDA for school closure:**
    - Any absence where the school **directs** students to stay home for a COVID-related reason. As long as students are home at the school’s direction, and the school is acting out of “concern” about COVID<sup>11</sup> then these are P-EBT-eligible days. This would include a school-ordered quarantine of a student, a group of students, a classroom, or a school. It would also include any other stay-at-home order mandated by the school, whatever its duration, as long as it is part of the school’s or the state’s protocol for managing COVID outbreaks, positive tests, potential exposure, etc. USDA will not second-guess any state or school that **directs** students to stay home for COVID-related reasons.
    - Any absence initiated by the parent that is **recognized and accepted by school officials as COVID-related, as evidenced by entry into our P-EBT portal**
    - **Informal data validation measures will be used to ensure that reported P-EBT eligibility does not exceed expectations based on COVID outbreaks.**
- Please describe separately for children in public and non-public schools.

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<sup>2</sup> 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.

- **The same process will be used for both public and nonpublic schools.**
- Describe the process that the State will use to update and re-establish each child's in-person and virtual schedules.
  - **During fall impacts (September-October), initial f/r data information will be used for November benefits. This will impact schools that have shut down due to COVID. The data will be reconciled based on actual occurrences and incorporated into January 2022 and May 2022 reporting periods to match the benefit issuances in February and June.**
- *How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)*
  - **This piece no longer applies since we are using actual information for benefit issuance and not monthly benefits. Schools will be able to update this information in real time.**
- 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).
  - **P-EBT 2.0 agreements are currently being updated that articulate specific roles and responsibilities. Can provide copy once finalized.**
- 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.
  - **Actual data on f/r status, enrollment and eligible school days will be reported three times during the year, November, January and May. This will:**
    - **Minimize the amount of time and work schools have to enter data**
    - **Use actual information of COVID related school impacts or absences. Currently, schools are not consistently tracking individual student absences so this will require additional tasks.**
    - **Provide adequate time to conduct technology updates to the P-EBT Portal**
    - **Provide adequate time to develop school guidance materials and communicate changes in the program**
    - **Provide adequate time to retain necessary staff resources to address training and technical assistance**
    - **For first benefit, gather information from schools that had entire school site or district closures to quickly process benefits in November. Tentative free and reduced and enrollment data will be used to capture impacted students.**

## 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.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

**Response:** [please use as much space as needed]

**The P-EBT 2.0 Portal will be modified to capture the initial confirmation of the 5-day closure, reduced hours, or reduced attendance. The staff person entering the data will enter the initial dates of impact and sign and date the information on the Portal to attest once the five-day component is met.**

**Schools will enter any new COVID occurrences into the Portal, listing impacted students as they occur. Schools will also enter any newly eligible qualifying students as they occur. P-EBT 3.0 Portal will collect the data for generating benefits to capture eligible students.**

**Simplifying assumptions**

- **Actual data on f/r status, enrollment and eligible school days will be entered as needed and/or monthly basis with goal of issuing benefits no less than four times during the year, November, February, June and July/August (Summer). This will:**
  - **Minimize the amount of time and work schools have to enter data**
  - **If school reports a COVID related impact, state will trust the school has verified it is a COVID related incidence.**
  - **Use actual information of COVID related school impacts or absences.**
  - **Provide adequate time to conduct technology updates to the P-EBT Portal**
  - **Provide adequate time to develop school guidance materials and communicate changes in the program**
  - **Provide adequate time to retain necessary staff resources to address training and technical assistance**
  - **For first benefit, gather information from schools that had entire school site or district closures to quickly process benefits as quickly as possible.**

**5. P-EBT for Children in Child Care (see Q&A's #25-33)**

**Response:**

**Standard for P-EBT Child Care Eligibility**

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

The child is a member of a household that is enrolled in SNAP in the benefit month.

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.)

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 P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe 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.

Minnesota will determine the Child Care P-EBT benefit level using lunch claim data from the Child and Adult Care Food Program (CACFP). The average reduction of meals served will be determined by comparing the data from 2019 to data from 2021.

**Simplifying assumptions for eligibility:**

- The state as a whole will be eligible for P-EBT Child Care benefits, regardless of location of residence.
- All children 5 and under on September 1, 2021 are assumed to be enrolled in Child Care.
- All Children will be receive the same, single benefit amount.

**CACFP Distributed Meal Count comparison:**

Phase 1 Issuance: September-December			
	2019	2021	Decrease
Sep	1,028,350	857,817	
Oct	1,199,140	839,767	
Nov	1,002,950	809,333	
DEC	949,608	766,994	
Totals	4,180,048	3,273,911	22%

Based on FNS lunch claims data for CACFP child care centers and family day care homes minus at-risk lunches and adult center lunches, there was a reduction of 21.9% for the months of September-December 2021 when compare to the months of September-December 2019.

Minnesota calculated the average number of instructional days per month by taking the instructional school days for the school year divided by 9 months. We will use the same 19.1 average in the calculation of the spring benefit. We feel this will bring a higher level of consistency to the benefit calculation across the school year. We use 4 months in calculation of the fall benefit and will use 5 months in the spring benefit calculation.

Calculations used:

$$\begin{array}{r} 19.1 \text{ average days of monthly school attendance} \\ \times \$7.10 \text{ per day benefit rate} = \\ \$135.61 \\ \times .22 \text{ (\% reduction of CACFP lunches served)} \\ \hline \$29.83 \end{array}$$

Using the reduction amount, the calculated monthly benefit for each participant will be \$30 for September – December 2021.

Since sponsors have 60 days to submit CACFP claims (so deadline to submit April claims is June 30), we will use January-March 2019 data compared to January-March 2022 to determine, if there is a reduction, the monthly January-May benefit amount to be issued in the July issuance.

Minnesota will notify FNS when the expected P-EBT Child Care spring monthly benefit calculations are completed in June and the final number is ready.

Minnesota will identify all children in Minnesota Department of Human Services' (DHS) eligibility system (MAXIS) who were **5 and under** as of September 1, 2021, and will issue P-EBT benefits to the child who is enrolled in SNAP for only the months that they were eligible.

A child who turns 6 after September 1, 2021, and did not receive P-EBT under the 2021-2022 School Enrollment plan for the months they received SNAP benefits will be eligible under the P-EBT Child Care plan through May 31, 2022, under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year

Minnesota will match the student level data from the P-EBT school based eligibility process against the children identified in MAXIS for P-EBT child care eligibility and eliminate any duplicate issuances on a monthly basis.

## 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	<b>\$7.10</b>
Alaska	6.03	3.78	1.63	<b>11.44</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	<b>8.28</b>

**Notes:**

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.

2. Breakfast rates are those received by "severe need" schools.

3. Snack rates are those for afterschool snacks served in afterschool care programs

Source: <https://www.govinfo.gov/content/pkg/FR-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.

***Initial new language proposed via email:***

*Eligibility for benefits collected on an ongoing basis at the school's discretion and convenience. Benefits issued based on actual number of COVID Impact days as submitted by schools and following the proposed schedule on page 10.*

**Additional clarification:**

**We will have a deadline for February issuance but schools can enter data whenever there is an impact. Refer to grid on page 2 d.**

**Schools will be encouraged to add impact data in real time and will be reminded of benefit issuance deadlines to reduce the number of eligible students missed in the benefit distribution.**

**Benefits will be issued to children based on the individual child's actual number of COVID-related absence days.**

**To better ensure that eligible children are awarded a benefit, MN's program team will implement the following measures:**

- **Directed out-reach to non-respondent schools and/or districts**
- **Multiple communications measures with identified timelines and deadlines for data submission.**
- **Un-announced extensions to data entry deadlines if known data delays identified.**

**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.

**Response:** [please use as much space as needed]

**MDE will use and modify the existing P-EBT portal developed for 2.0 to collect data from schools. Modifications to the user interface and updates to the calculations logic anticipated to take 2-3 months from the time the team is in place.**

**By using the same data transfer capabilities between MDE & DHS, the team reduces the risk of new technical processes. New data collection needs will mean a greater burden on schools to identify, collect and report data for benefit recipients.**

**Benefits will be staggered for P-EBT 3.0 no later than the following manner:**

Eligibility	Issuance
<b>Phase I: School closure impacts identified</b>	
<b>September – October impacts</b>	<b>~ November, 2021</b>
<b>Phase II: Data uploads from Schools</b>	
<b>September 2021 – December 2021</b>	<b>February 2022</b>
<b>January 2022 – May 2022</b>	<b>June 2022</b>
<b>June 2022 &amp; Summer 2022</b>	<b>July or August 2022*</b>

\*This will include a “catch-up” opportunity for any missed students. Schools will be reminded of the opportunity to capture any missed students via personal calls, emails and other technical assistance tools.

Childcare P-EBT benefits will be issued on existing state EBT cards, with priority issuance of P-EBT benefits before SNAP benefits. Because the Childcare P-EBT benefit will be issued to the household’s existing EBT card we do not anticipate an issue with returned cards for this phase of the program. Expungement will follow current SNAP rules. Childcare P-EBT benefits will be issued as an AF benefit code.

Benefits will be staggered over five days based on the last digit of the MAXIS case number and issued over a three month period.

**Benefits will be staggered for P-EBT 3.0 Child Care no later than the following manner:**

Issuance Schedule	June 2022	July or August
SNAP eligible children under age 6	Sept/Oct/Nov/Dec 2021	Jan/Feb/Mar/Apr/May 2022

\*January through March 2022 CACFP data will be averaged to determine monthly benefits for January through May 2022.

\*This will include a “catch-up” opportunity for any missed children.

P-EBT Child Care benefits will be issued to children for only the months that they are in an eligible SNAP household.

Minnesota will update FNS of any changes to our issuance schedule, going forward.

### Staggering of Issuances

DHS will issue P-EBT benefits after regular SNAP issuances have occurred for the month through the 15<sup>th</sup>. In alignment with our 2.0 plan, MDE will send the disbursement file to DHS upon verification of all data as soon after the first of each month. DHS will send the file to the EBT processor on the 3<sup>rd</sup> Thursday night after regular batch processes have run. Benefits will be available on cards the following week from Monday through Wednesday staggered by the last digit of the P-EBT case number.

Last digit	Funds Available
0, 1, 2	Monday
3, 4, 5	Tuesday
6, 7, 8, 9	Wednesday

- 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?

School based benefits will be issued on the same card as the 2.0 benefits for non-SNAP households. Benefit recipients from the 2.0 program were asked to retain their P-EBT card to reduce the need to issue new cards. If new cards either are necessary due to a lost or destroyed card, or newly identified benefit recipients, the cards will be in the same format as used for 2.0: white cards, issued in the child’s name. Card replacement will follow the existing process.

**Expungement of P-EBT benefits on the white P-EBT card will follow the same rules as for a SNAP benefit card: 364 days after issuance.**

- 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?

**DHS will receive a daily report from the EBT processor of returned cards. Families are provided information on the state's P-EBT website for how to request a replacement card or report change of address. Families can contact the call center for further instructions if the card does not arrive in the mail. Families receive text and or email messages as benefits are processed to let them know when funds are placed in their account.**

**The P-EBT Child Care Plan will mirror our approved P-EBT School Plan.**

- 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?

**The state will continue to use the white P-BET card design for SNAP and non-SNAP households and will issue a card to each child eligible for P-EBT 3.0 benefits. Replacement cards can be requested by calling EBT customer service if the household no longer has the card issued for P-EBT 2.0.**

- 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 will use benefit type PB to distinguish P-EBT benefits from SNAP and D-SNAP issuances.**
- 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.  
**P-EBT 3.0 benefits will be first in spend order followed by SNAP benefits.**
- 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.  
**P-EBT 3.0 benefits will follow SNAP expungement rules.**

- 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?  
**Addresses validation using USPS software will be used to ensure cards are mailed to valid addresses. In “c/o Parent name” will be added to address to ensure card in a child’s name is delivered.**
- Will you issue *new* P-EBT cards to existing P-EBT households?  
**The state will use existing white P-EBT cards to issue P-EBT 3.0 benefits. Replacement cards can be requested by calling EBT customer service if the household no longer has the card issued for P-EBT 2.0.**
- If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?  
N/A
- If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?  
N/A

## 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 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 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]

**MDE will work with schools to provide template parent letters and information that can be shared on school district websites, emails and text messages and will include a direct link to the DHS P-EBT participant website.**

**Schools handle overall free and reduced eligibility at the district level. Homeless and foster children are handled through direct certification. Schools also work to provide forms in alternate languages or work through their ESL staff. Children with disabilities can have f/r status incorporated into their 504 plans for school benefits. Specific guidance and training will be given to school districts on how to identify and update guardians in the P-EBT portal, using homeless and migrant liaisons to capture the most accurate data.**

**The DHS P-EBT Call Center will remain in place to address inquiries. DHS and MDE will have a review committee to discuss and investigate disputes and issuance errors on a case-by-case basis.**



**MDE will hire two P-EBT customer service representatives and one new P-EBT Coordinator for the remainder of the project. Previously, MDE nutrition staff had been temporarily assigned (due to the unknown length of P-EBT) and that was no longer an option. The supervisor of Special Project and Administrative Services and the communication/tech specialist will also have time assigned to P-EBT.**

**Examples of communications:**

- ✓ **Contact your child’s school if you want to opt out.**
- ✓ **You can keep the P-EBT card in case your family circumstances change.**
- ✓ **Benefits will be valid for up to one year from the date issued.**
- ✓ **The P-EBT program provides additional food to families in need, and using these benefits helps local grocery stores and employers.**

**Families that are eligible for benefits will receive text messages or emails with links to the P-EBT website for additional information. Information on the website is updated regularly in response to frequently asked questions or changes to the programs. Some of the information available includes:**

- ✓ **Pandemic Electronic Benefit Transfer (P-EBT) is a temporary food benefit available to Minnesota families with children who would have received free or reduced-price meals if schools were open.**
- ✓ **P-EBT benefits can be used to purchase the same items that can be purchased by SNAP benefits.**
- ✓ **For information on what can be purchased with P-EBT, visit USDA’s “[What can SNAP Buy?](#)” webpage. Additional information is available in the [How to use your MN EBT Card \(PDF\)](#) brochure. At the store, use your P-EBT card like a debit card.**
- ✓ **In addition, social media posts are made by DHS on Facebook as well as shared with community partners and via press release.**

**On issues such as public information campaign, EBT issues, and dispute resolution, the P-EBT Child Care Plan will mirror our approved P-EBT School Plan.**

## **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:** [please use as much space as needed]

**During the P-EBT 2.0 program, overpayments totaling \$10,320.00 to 13 children were identified. The average overpayment was \$793.85 per child. This reflects a rate of .0023% in duplicate or over-payments. We believe this reflects that the P-EBT Portal has effective checks and balances built in and will continue to use those processes. Note: These overpayment figures are outside of the known data submission error made by a single school that resulted in \$133,339 in payments to ~345 students over 4 months.**

**MDE staff will monitor P-EBT data including a comparison of free and reduced-price eligible students reported to MARSS against the number of students reported in the P-EBT portal to help ensure that schools are not reporting more students for P-EBT than has been reported in MARSS.**

**MDE will also conduct periodic checks to see if the COVID related absences are in line with the COVID incidence reports in the county/region.**

#### **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:**

\_\_\_\_\_  
*Jovon Perry*  
Signature

**Jovon Perry, Director of Economic Assistance Employment Supports**  
Print Name and Title

\_\_\_\_\_  
Signature

Print Name and Title

*Monica L. Herrera*

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Signature

**Monica L. Herrera, Director of Nutrition Program Services**

Print Name and Title

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Signature

Print Name and Title

**Date of Request** \_\_\_\_\_