

**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
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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 the 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/or 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, 2021-2022**

**1. State: Missouri**

- 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:
  - Summer 2021 estimated additional issuance:
  - 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. Missouri proposes this 2021-2022 plan for the date range for children in school during the school year 2021-2022: September 12021 through June 30, 2022.
- b. The State makes the following estimates:
  - Monthly issuance of \$9,275,138 to school children in SNAP and in non-SNAP households
  - Total issuance of \$83,476,242 (monthly estimate multiplied by the nine months for school children in SNAP and non-SNAP households
  - These estimates reflect the daily rate of \$7.10 and using an estimate that 20% of the children missed 3-5 days, 20% of school children missed 6-15 days and 10% of school children are fully virtual.

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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).

- The estimate of 10% school children are fully virtual is used from the State Plan for PEBT 2020-2021.
- c. The estimated total number of school children to which the State will issue P-EBT benefits is approximately 334,849.
  - Estimated number of school children in SNAP households based on an average number between February 2020 and 2022.
- d. Missouri intends to issue P-EBT benefits retroactively as a lump sum for all eligible participants. As schools authorized representative submits the school eligible participants cases will be set up and benefits issued retroactively for all months.

Below is an estimate for PEBT 3.0.

- It's \$4.50 onetime fee for new set ups.

Months Distro Planned	Combo	PE Only
1	\$ 1.65	\$ 5.56
2	\$ 0.83	\$ 2.78
3	\$ 0.55	\$ 1.85
4	\$ 0.41	\$ 1.39

Total Kids from the plan	334,849
Estimate based on 1/12 of kids are new	27,904

P-EBT set up fee for new cases \$4.50 (1/12 of kids)	\$ 125,568.38
Cost for doing one mass issuance (\$5.56 * 334,849)	\$ 1,861,760.44
	<b>\$ 1,987,328.82</b>

P-EBT set up fee for new cases \$4.50 (1/12 of kids)	\$ 125,568.38
Cost for doing two issuances - issuance one \$2.78 (\$5.56/2)	\$ 930,880.22
Cost for doing two issuances - issuance two \$2.78 (\$5.56/2)	\$ 930,880.22
	<b>\$ 1,987,328.82</b>

#### 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 the 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.*)
- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals<sup>2</sup>? 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 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).
- 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:**

**The following agencies are responsible for the issuance of benefits:**

- The Missouri Department of Social Services (MDSS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards. A flyer will be printed with each card to provide customer support.

<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 Missouri Department of Secondary and Elementary Education (MO DESE) trains local school districts on free and reduced-price eligibility determinations and provides continuous support throughout the school year. Local school districts determine school meal eligibility and track student learning and attendance. MDSS and MO DESE will work in conjunction to resolve any issues or concerns regarding P-EBT.

**The responses below are about benefits for September through June 2022.**

**Collecting students eligibility procedure:**

Missouri DESE and Missouri DSS will gather information on eligible students directly from Local Education Agency (LEAs) and non-public schools via a electronic cloud based portal. School Food Authorities will access the portal and answer a question about the mechanisms put in place to track excused COVID-related student absences. The responses from the LEA and non-public schools will be use to divide schools between two submission types based on the schools ability to track COVID-related excused absences or virtual learning days. Schools that are able to track will submit the names of students with approved fully virtual schedules, the names of students with COVID-related excused absences and the actual count of those days. For schools that cannot track COVID-related absences, any excused absence of five consecutive days or more will be a presumed COVID-related absence. Schools will be instructed to only provide COVID attendance data on free and reduced eligible students and will not provide data on non-students or ineligible students.

For additional integrity, MO DESE has prepared a file of student enrollment data from the State DESE MOSIS system collected in February 2022 from LEAs. This data will be imported in the portal. As a result the LEAs will see their list of students as of February that are eligible for free or reduced-price meals based on the school year 2021-2022 to help prepare the submission data. LEAs will also be instructed to review the listing of students and make applicable updates to the list to add students newly eligible by way of direct certification, other categorical eligibility sources, or via the 2021-2022 National School Lunch Program (NSLP) approved household applications only.

Non-public schools will receive instructions to add their roster of students to the portal based on student eligibility. Information on eligible students has to come directly from the non-public schools because Missouri DESE does not have a mechanism to collect student data from non-public school districts. These school types will be provided an excel spreadsheet template and instructed to upload a list of their students determined eligible for free or reduced-price meals for the school year 2021-2022. Schools will also be instructed to only provide eligible students by way of direct certification, other categorical eligibility sources, or via the 2021-2022 National School Lunch Program (NSLP) approved household applications. Schools will be instructed to only provide data on eligible students and will not provide data on non-students or ineligible students.

Schools will submit the report of eligible students to provide the most current student data including those newly determined as eligible for meal benefits, transfers, new to the district, etc. Schools are accepting new applications from families leading to new free or reduced determinations being made. Missouri schools continue to conduct Direct Certification weekly to directly certify children who are newly eligible this year. Due to the timing of plan approval, all students who meet the eligibility requirements may be eligible for benefits retrospectively back through September 1, 2021.

**Collecting COVID-related absences procedure:**

Missouri does not have a system to track on an individual student level who can access meals and who cannot and will make the simplifying assumption that students that are not in school due to COVID-related absences or adjusted schedules do not have meals available. Therefore, a student that is learning outside of the school building (fully remote or quarantined) will not have access to meals. Since Missouri does not have a mechanism to track students COVID-related absences, Missouri will implement a plan depending on a school's mechanism to track COVID-related absences or virtual learning days.

- For schools that are tracking COVID-related absences, the school will be instructed to provide the actual count of those days.
- For Schools that cannot track COVID-related absences, any excused absence of five consecutive days or more will be a presumed COVID-related absence.

Schools will submit data through a cloud based portal system. The absent days will be assigned a logic to determine the appropriate level for benefits. Families will be notified by the school district via a letter to inform households of P-EBT benefits and instructions for not participating in P-EBT benefits.

Currently, Missouri does not know of any schools operating a hybrid schedule. Missouri is not aware of any schools that closed during SY21-22 due to COVID. Therefore, Missouri is anticipating providing benefits to student learning fully virtual through the school district and not a virtual academy, as well as students that were not in-seat due to COVID such as a requirement to quarantine. Quarantine includes both required quarantine per the local health department as well as missed days for self-quarantining or isolation. The benefit amount for these students are assigned a level based the length of the school days the student was absent.

Fully virtual students will be included in 16 or more days level amount unless their fully remote status changes. This will apply to all categories of students including SNAP, non-SNAP, public, and non-public. Missouri schools provide approximately 174 days of learning during a school year excluding holidays, teacher in-service and inclement weather days. Missouri believes using 17.4 days to calculate the fully virtual amount is reasonable.

Missouri proposes to use three benefit levels to determine benefit amounts for eligible students. Eligible students in one of three levels based on the length of their approved COVID-related absences and virtual learning days. A school will be considered eligible once the 5-day threshold is met, then any subsequent absences due to COVID make students eligible for P-EBT benefits for those days. A 3-day benefit amount will be issued for children with 1-5 COVID-related absences for a monthly amount of \$21.30. A 10-day benefit amount will be issued for children with 6-15 COVID-related absences for a monthly amount of \$71. A fully virtual or 16+ day benefit amount will be issued for children with 16 or more COVID-related absences for an amount of \$120.70.

Each school district (public and non-public) will provide data to Missouri DESE through a secure upload portal, this student data. The data received by the schools will be used to process and issue benefits and includes students' first and last names, date of birth, mailing address, gender, parent/guardian name(s), name of the school, and school district. Missouri DESE plans to collect data late in May for the entire SY 21-22. MO DESE will submit a plan for Summer 2022 PEBT and collect data from schools in the month of June. Public and non-public schools will update their eligible students again in later months for any students missed during the initial collection.

Missouri DESE is responsible for the following:

- Training and communication with all school districts in Missouri in regards to P-EBT eligibility, assist school with sample communication to disseminate to families, and assist schools in providing eligibility data. This includes PowerPoint presentations, training videos, guidance manuals, flow-chart, emails, phone calls, etc.
- Post a public notice release on the DESE website and FAQ.
- Creating and maintaining a secure portal for school districts to provide and upload data as requested.
- Assist school districts with eligibility determinations and any problems occurring with the submission of data.
- Preparing data received from school districts for DSS.
- Participate in meetings with DHHS to ensure planning is complete and troubleshoot any problems discovered.

Department of Social Services is responsible for the following:

- Providing coordination with EBT card vendor
- Provide communication to the public callers related to P-EBT card information and technical issues concerning the P-EBT card including lost and damaged cards.
- Deliver card to address listed from the school in the file received by DESE to issue benefits to families.
- Ensure benefits are issued correctly after file is received from DESE.
- Answer direct questions from families regarding P-EBT cards and purchases and destroying the card if the family does not want to accept benefits.
- Provide training to staff responsible for answering questions from families concerning P-EBT cards including undeliverable cards, lost and damaged cards, replacements and other card technical issues.
- Participate in meetings with DESE as needed to ensure plan is complete and troubleshoot any problems discovered.

Public Awareness Campaign: Missouri will conduct a public information campaign through use of websites and social media platforms. Missouri intends to issue a press release to target statewide and local news organizations. Schools will be provided with informational templates to use in notifying families in their districts. Missouri will also engage with community stakeholders to ensure information about the program reaches individuals who may be eligible, but are difficult to reach due to geographic and technological limitations.

Additional communication will be provided for families with school children enrolled in a Community Eligibility Provision (CEP) district to further explain instructions for families who may not want to receive benefits.

The state will rely on schools to provide data of eligible children for the 2021-2022 school year. The simplifying assumption will be applied to students in quarantine and their length of quarantine as explained above. The schools will be responsible for providing the data for the determination of the benefit amount.

## **B. School Status**

### *Standard/or 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:**

Schools in Missouri are currently all in person with options available for full-time virtual learning provided by the school district. Schools will provide information on the eligible students to Missouri DESE through a secure web based portal. Each school district will be responsible for providing a list of eligible P-EBT students through the web based portal.

Currently, schools in Missouri are either in school. Districts are providing a full-time virtual option to make accommodations due to COVID-19. We are not aware of split (hybrid) learning environments or closures. However, the COVID-related absences reported eligible for P-EBT will be classified into three different tiers according to the number of days absent. Missouri will be issuing benefits retrospectively based on the student data provided by the school districts. A school will be considered eligible once the 5-day threshold is met. Missouri will implement a plan depending on a school's mechanism to track COVID-related absences or COVID-related virtual learning days.

For schools that are tracking COVID-related absences, the school will be instructed to provide the actual count of those days, once the five day threshold is met.

For Schools that cannot track COVID-related absences, any excused absence of five consecutive days or more will be a presumed COVID-related absence.

Missouri will rely on data for eligible students provided directly from the schools. Data will be obtained during one-time batch collection from each LEA and non-public school, as this is the best data available to issue benefits for SY 21-22. Upon a summer P-EBT plan approval, Missouri schools will have access to the portal to submit students eligible for Summer 22 benefits. It will be the responsibility of each school district to provide the student data for all eligible students.

Children with 1-4 excused absences (in schools not tracking COVID-related absences)

For schools that are reporting blocks of consecutive excused absences instead of COVID-related absences, there will be some children whose absences of 1-4 days are COVID-related. Under that process, parents would fill out a survey or form provided by the school (or contact their school district) and attest that their child's 1-4 day absence was COVID-related. The school must confirm that the absences were at least excused or verified before issuing P-EBT benefits for those days.

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

*Standard for P-EBT Eligibility*

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

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

- 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 are 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:
  - o the child's child care facility is closed or is operating with reduced attendance or hours, or
  - o 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.)

The standard benefit amounts used for the school children will also be used for children in child care.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

**Response:**

This section has been removed.

**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>
<b>Alaska</b>	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>

**Natas:**

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.
  - a. 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:**

A school will be considered eligible once a 5-day threshold is met, then any subsequent absences due to COVID make students eligible for P-EBT benefits for those days. Missouri will use a 3-tiered benefit level to determine benefit amounts once a school has met the initial threshold for P-EBT eligibility.

Number of days out of school	Number of days used for the benefit amount	Monthly benefit amount
Tier 1: 1-5	3 days	\$21.30
Tier 2: 6-15	10 days	\$71
16+	17 days	\$120.70

**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 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 2020-2021. 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 the expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for 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 return 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:**

**Estimated timeline:**

Dates are subject to change and DESE will notify FNS on any changes made:

<b>Benefit Months</b>	<b>Date Schools Provide Data to MO DESE</b>	<b>Date DESE Provides Data to MDSS</b>	<b>Issuance Dates</b>
September 2021-June 2022	June 2022	June 30,2022	July-August 2022
Summer 2022	July and August 2022	August-September 2022	August-September,2022

Returned cards will be handled by a return mail group at the Department of Social Services, Family Support Division and work with DESE on any returned P EBT cards. FSD may send emails as necessary to school districts with a list of returned cards (we can adjust the frequency as needed) and asking for updated address and if not provided we will destroy the cards in accordance to regulations. Another option we are exploring through the electronic portal to create cases for returned cards. Those cases can be sent back to the school district that entered the benefit and DESE can compare a new cycle of student enrollment data to see if the student will match in another district. DSS will provide P-EBT cards to DESE deemed eligible children to each school/district who completed DESEs information gathering survey. Cards will be issued in eligible child's name, the school district

will determine best practice for retrieval of P-EBT card by parent/guardian.

The P-EBT mailer included with the P-EBT card will include information on where to go for step-by-step instructions on how to PIN their card. P-EBT cards can be replaced in the same manner as EBT cards. Participants can call the number of the FIS Call Center which is provided to them when they receive their card or they can call the FSD Call Center.

Missouri is committed to equitable access for all eligible families regardless of circumstances. The FSD will work 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 will provide contact information for the school districts homeless liaison. Schools 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. The school district will be required to submit to FSD attestations and any cards that were not picked up.

## 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:
  - o 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
- In-formation 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)
- o 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, robocall, and/or other electronic means?

**Response:**

Missouri DESE has an e-mail box specific for schools and can accept schools P-EBT related questions and concerns through this e-mail box. NSLP Program staff monitor this mailbox.

Missouri DSS call contact center will answer P-EBT specific questions and concerns from families concerning their P-EBT card.

Schools will accept P-EBT calls from their families and coordinate with DESE to ensure proper assistance is provided.

To help better serve groups with potential access problems, Missouri will utilize our Outreach partners and other community agencies to help provide information and assist these populations.

The state will conduct a public information using our State Agency websites. Missouri will issue press releases to target statewide stakeholders. The state will work with schools and community agencies to push out template flyers, emails, and possibly text messages.

Direct messaging: P-EBT eligible families will receive information regarding P-EBT through their schools. Each P-EBT card will contain a flyer from DSS that contains information about PEBT benefits and card usage. Information will be provided to SNAP and non-SNAP households in the same manner.

Reconsideration Process: Any disputes of eligibility will be addressed, as they become known. Parents and guardians should report errors through their school district. School districts will then route any errors to MO DESE FNS office. Our office will work with schools to ensure understanding of the program and that accurate information is sent to families concerning how benefits are issued. Missouri will work to ensure all families are treated with dignity and respect while working to resolve all disputes and issuance errors. Families will be provided with an opportunity to request a reconsideration if children with 1-4 excused absences in schools not tracking COVID-related absences. Families must complete the reconsideration request through the school by attesting to their student's COVID-19 related absence eligibility. Schools will review the individual circumstances and, as necessary, provide P-EBT benefits by submitting the student information through the portal.

- A school is eligible once the 5-day threshold is met, then any subsequent excused absence due to COVID make students eligible for P-EBT benefits for those days. Excused absence can 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 if it is part of the school or the state's protocol for managing COVID outbreaks, positive tests, or potential exposure.
- A school is eligible once the 5-day threshold is met, then any subsequent absences due to COVID make students eligible for P-EBT benefits for those days. In the case an absence is initiated by the parent that is recognized and accepted by school officials as COVID-related then at the discretion of the school or the state, this could include a parent's decision to keep their child home after a positive test or possible exposure to COVID. It could also include a parent's decision to keep their child home after exposure at school in cases where the school does not direct the child to stay home.

Missouri does not have a mechanism to verify or confirm the number of eligible COVID-related absences that were excused and virtual learning days and therefore will accept schools submissions at face-value. A school will be considered eligible once the 5-day threshold is met, then any subsequent absences due to COVID make students eligible for P-EBT benefits for those days. Missouri does not have a system to verify the school or student has met the minimum threshold.

Parents who do not wish to receive P-EBT benefits will be provided with information on how to dispose of the card. This information will be included through e-mails provided by the school.

## **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 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:**

Missouri will issue benefits based on cases provided by the school districts who have mechanisms to collect COVID-related absences. Schools will properly send DSS files through a portal. DESE has no mechanism to check accuracy for absences. MODSS will make all reasonable efforts to detect over-issuances and improper payments. For instances where the overpayments occur due to a system error the benefit will be recouped by DSS if readily available. If the benefit was spent, the case may be referred to the Missouri Program Integrity Unity (PIU).

**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:**

. Barbara Shaw, Coordinator

*Barbara Shaw*

\_\_\_\_\_  
Signature

*Melissa Wood*

\_\_\_\_\_  
Signature

Date of Request ...4-22 -2022\_