

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021

1. **State:** Mississippi

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

3. **Executive Summary:**

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

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- 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 \$0
- 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. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Response:

The State plan is for August 2020 through May 2021 for children in school only. The Mississippi Department of Education (MDE) and Mississippi Department of Human Services (MDHS) estimate the total amount issued to school children in SNAP households to be \$116,622,000. In addition, the total amount to be issued to school children in non-SNAP households is estimated to be \$63,221,400. This totals \$179,843,400 for all households. This

amount is estimated to account for 108,000 children in SNAP households and 77,000 children in non-SNAP households totaling an approximate amount of 185,000.

These numbers are based on estimates from Spring 2020 figures and anticipated school schedules provided by school districts in July 2020.

The state estimates the total amount of administrative funds the State needs to execute this State plan to be \$4,940,000. These costs are inclusive of work being performed by Conduent, our EBT Vendor, and modifications to MDHS' P-EBT system. The costs for Conduent include file receipt and processing, a call center specifically staffed to address P-EBT questions/issues, and card issuance

All households will be issued P-EBT benefits on the same schedule, since MDHS will issue a P-EBT card for each child in the household, regardless of receipt of SNAP benefits. The issuance schedule is further defined below.

¹ The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

² Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

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

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
 - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- 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: [please use as much space as needed]

The local school districts will confirm eligibility by submitting files to the Mississippi Department of Education (MDE). The private schools confirm eligibility by submitting files to the Mississippi Department of Human Services (MDHS). The necessary file format will

be provided to the local school districts and private schools by June 4, 2021. Since the data requirements will have been received by the schools/districts in advance of plan approval, we are expecting that the information can be provided to MDE and MDHS (private schools only) within 5 days of plan approval. MDE expects schools will have the appropriate staff on hand to provide the needed data. The local school districts are responsible for providing the child's correct address for any EBT cards returned due to an inaccurate address.

MDE is responsible for collecting all information regarding eligible children and ensuring local public school districts have determined eligibility for the National School Lunch Program (NSLP). MDE is also responsible for providing guidance to the local school districts in regards to which children must be included in the file and working with MDHS to resolve any issues that arise.

MDE will instruct the local school districts and private schools to only submit files containing children eligible for the National School Lunch Program (NSLP) for the months of August 2020 – May 2021, including children eligible by CEP and Provisions 1, 2, and 3. As all children receiving SNAP are eligible for NSLP, all SNAP children will be included in the files provided by the school districts and private schools. Any guidance on determining which children are eligible will be provided to the local school districts and private schools by MDE.

MDHS is responsible for collecting the files from the private schools and the learning mode predominately used by the schools within five (5) days, monitoring Conduent and working with Conduent and MDE to resolve any issues that arise. MDHS will monitor information submitted to Conduent. We will ensure that information matches the actual card issuance by tracking the information in the MDHS built P-EBT system and in Conduent's EPPIC system.

Conduent is responsible for handling all P-EBT calls, and mailing out cards to eligible children. Conduent will issue benefits based on a student's eligibility based on the school learning mode that is being predominately employed by the school. All cards returned in the mail will be logged by Conduent and transmitted to the local school districts through MDE requesting the child's updated address. Conduent will produce a file of all returned cards and submit to MDHS for any addresses not received by September 30, 2021. Conduent is responsible for logging and informing the state of any over issuances or other issues they are unable to resolve.

As P-EBT cards will be issued to each child, the identification of SNAP households will not be required by the local school districts and private schools. Due to the timing of the submission of the plan to USDA, the short time frame for schools to return the data, and the planned date for issuance of benefits, we anticipate only one transfer of student data. Only students currently categorized as eligible will be included in the files. Schools were encouraged to continue to make Direct Certification matches throughout the 2020-2021 school year and to process any income applications submitted. If no response is received from a school district or private school, we will infer that the school does not wish to participate. Furthermore, files submitted by a school district or private school in an improper format will not be accepted. The school district or private school may correct the file and resubmit within 5 business days.

MDE will provide every public school district and MDHS will provide private schools with a survey to determine the predominant learning mode each month (hybrid, remote, or no alternative schedule) for each school. Since this is late in the school year, all prior months will be gathered immediately. The schools will also be contacted in June for May. No response from any school will indicate the school is not eligible or no alternate schedule was utilized.

Due to the limited information available concerning the learning mode of each child, MDHS will use simplifying assumptions to issue P-EBT benefits based on the predominant learning mode (at least 51%) utilized by each school. Children in a school with less than 51% in a virtual and/or hybrid learning mode will not be issued any benefits.

As all payments will be issued retroactively, both MDE and MDHS are ensuring benefits are only given to eligible children who have missed school for the month(s) in question. In addition, retroactive payments allow for adjustments based on new information received from local school districts and private schools.

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

The initial and ongoing contact by MDE with school districts and private schools will identify all eligible schools meeting the criteria listed above for the school year (August 2020 – May 2021).

As described above, MDE will remain in contact with public schools to ensure all eligible children are included. As described above, MDHS will remain in contact with the private schools to ensure all eligible children are included. The proper benefit amount will be a set amount determined by the predominant learning mode (hybrid, remote, or no alternate schedule). As school districts change the predominant learning mode, P-EBT benefits will be adjusted month-to-month.

As P-EBT benefits will be issued retroactively, Conduent will issue benefits based on learning mode to eligible children after the month in which the child was eligible. If any children are identified after benefits have been issued, benefits will be issued to them as quickly as possible.

MDHS and MDE will not verify or be held responsible if children receive P-EBT benefits as well as participate in any other program providing lunch to students, including but not limited to public school grab and go lunches, other non-profit programs providing lunch or food boxes, or private companies providing lunch.

In addition, MDHS will not consider or be held responsible for any inconsistent household information, such as household composition, from the MDE file as a reportable change known to the agency for SNAP cases. As outlined below in item 9, MDHS will identify and recoup any improper payments for P-EBT recipients.

5. P-EBT for Children in Child Care

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 received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- 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 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:

At this time, Mississippi is not submitting a plan to issue Pandemic EBT to children in child care.

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 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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-2020-07-22/pdf/2020-15764.pdf>

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

Response: [please use as much space as needed]

MDHS will issue \$6.82 a day, per child, when the school is not in session or students are attending remotely. Mississippi state law (§ 37-13-63) requires schools to be in session for a minimum of 180 days; therefore, the following calculation was used to determine the average number of days each month:

$$180 \text{ days} / 10 \text{ months} = 18 \text{ school days (on average)}$$

Assuming that traditional students attend 18 school days per month, MDHS will make the simplifying assumption that students participating in a virtual learning mode will attend school virtually for 18 days each month. Therefore, schools with children participating in a virtual learning mode will receive \$6.82 for 18 days or \$122.76 each month ($\$6.82 \times 18 = \122.76).

Using a sampling of districts that indicated they were operating on a hybrid schedule, MDE reviewed district plans and communications available on their websites to determine the most common schedules. In all cases found, the districts operated on an A/B schedule, alternating days based on name, or 2 on/2 off. Therefore, students in the sample were attending 50% of days in person. Therefore, MDE and MDHS will make a simplifying assumption students in a

hybrid schedule are at school half of the time or 9 days per month. As such, schools with children participating in a hybrid learning mode will receive \$6.82 for 9 days ($\$6.82 \times 9 = \61.38).

MDHS will issue benefits based on the predominate schedule for each school during the course of the regular school year. Students participating in virtual learning due to parental choice will be handled on a case by case basis.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?

- If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Once the P-EBT Plan is approved, MDHS will simultaneously begin the social media campaign (along with an anticipated timeline) and receiving files from private schools. MDE will begin transmitting files from school districts. In order to ensure schools have adequate time to gather the required information, MDHS has provided MDE with the information and the required formats to allow school staff to coordinate the request with any information technology (IT) staff.

The Conduent Call Center will be live within 30 days of the date the contract is executed.

To ensure time to consume the files from local school districts and to ensure the Conduent Call Center is established, MDHS expects to be able to begin issuing benefits within 45 days from the date the P-EBT Plan is approved, assuming the change order with Conduent has been executed. MDHS will issue P-EBT benefits with the initial load of August benefits on day 45, and will issue remaining months on a weekly basis, until all months have been issued/loaded to the P-EBT card.

Month	Estimated Issuance Dates from Contract Execution	Estimated Date
August	30	July 22
September	37	July 29
October	44	August 5
November	51	August 12
December	58	August 19
January	65	August 26
February	72	September 2
March	79	September 9
April	86	September 16
May	93	September 23

All benefits will be issued by September 23rd, to allow time for any issues that may need to be resolved.

MDHS will issue P-EBT to all households (SNAP and non-SNAP) on a P-EBT specific card to ensure no confusion between regular SNAP benefits and P-EBT benefits. Furthermore, a P-EBT card will be issued for each child in the household. No pandemic EBT funds will be released directly onto existing SNAP or P-EBT cards from the first round of benefits issued for the months of March – May 2020. As MDHS is using a separate card only containing P-EBT benefits, no priority will be established. New P-EBT cards will be re-issued to all households as MDHS expects many families have discarded the older card since they were informed P-EBT was a one-time payment. Households will be instructed to contact the P-EBT Customer Service Center regarding replacement P-EBT cards.

MDHS will use a distinct sub-type benefit to systematically distinguish P-EBT from SNAP and DSNAP. All P-EBT benefits will follow the normal expungement processing timeline and will be expunged based on the number of days of inactivity.

MDE will contact the local school districts to request updated addresses. In addition, MDHS will be provided a report of all returned cards not re-issued by September 30, 2021.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe 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 Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used

- Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
- Explanation of violations and penalties, such as trafficking
- An indication that benefits are non-transferable
- Instructions for destroying the card, if they want to decline benefits
- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

MDHS will partner with Conduent to provide a call center for households with P-EBT questions. The call center will be open from 10am-7pm to allow households to call outside of normal business hours. Conduent, through MDHS and MDE, will handle all disputes and any issuance errors, with assistance from local school districts or private schools, if needed.

As no application will be required, households will not be required to have internet access. P-EBT cards will be mailed to the guardian and address on file with the school. The information attached to the P-EBT card will be transmitted with an explanation in Spanish and Vietnamese to call for assistance. In addition, the aforementioned call center will have agents capable of speaking these languages.

MDHS and MDE will conduct a public information campaign to alert P-EBT recipients of the purpose of P-EBT and how it is to be used. The public information campaign will include press releases and social media sources including agency websites (including the agency chat bot), Facebook, Twitter, and Instagram.

The information outlined will include:

- the P-EBT call center number
- the new look of the P-EBT card
- notification that every eligible household will receive a new card per child specifically for P-EBT
- the issuance schedule

SNAP and non-SNAP households will be instructed that P-EBT benefits are not transferrable and if they do not wish to participate to destroy the card or return the card back to MDHS.

MDHS will provide a description similar to the following to both SNAP and non-SNAP households:

Together the Mississippi Department of Human Services (MDHS) and the Mississippi Department of Education (MDE) are providing Pandemic Electronic Benefit Transfer (P-EBT) to Supplemental Nutrition Assistance Program (SNAP) and non-SNAP households with children who have temporarily lost access to free or reduced-price school meals due to pandemic-related school closures.

MDHS will inform P-EBT recipients (regardless of household type) how they can PIN the card.

Information pertaining to where benefits can be used, how benefits can and cannot be used, an explanation of violations and penalties, and the P-EBT Call Center number (including hours of operation) will be available on the MDHS website.

All information will be provided with the P-EBT card and/or on the MDHS website, so the information will be available to all households.

The information above will be communicated to the recipient via a “buck slip” with the P-EBT card.

MDHS will communicate general information to the public through social media and our website; however, client specific information will only be transmitted through email or over the phone, including responses to direct messages received through social media.

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.

Response: [please use as much space as needed]

MDHS anticipates to have a low number of over-issuances due to the following changes with this plan:

- NSLP eligible children will be received directly from school districts and private schools
- Each individual child will receive a card
- Benefits will be issued retroactively

Each instance of suspected over-issuance will be individually investigated and adjustments will be made based on the validity of the claim.

Claims will be established for suspected over-issuances in the amount of \$125 and over.

Once an over-issuance is identified and established, clients will be notified of their over-issuance amount, the reason for the over-issuance, and will be advised on all options available for repayment of the over-issuance.

Clients will also be notified that severely delinquent over-issuances can be subject to offset by the Treasury Offset Program (this is subject to change with further guidance from FNS).

Clients will be advised that MDHS shall not use current SNAP benefits to settle or repay a P-EBT claim.

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, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

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." No additional Data Use Agreements (DUA) will be required with individual school districts or private schools.

13. Civil Rights Statement

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

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

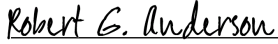
wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:



Child Nutrition State Agency Signature
Carey M. Wright, Ed.D.
State Superintendent of Education

DocuSigned by:



SNAP State Agency Signature
Print Name and Title

Date of Request: 6/4/2021