

**Amendment to Approved State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2022**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	Amendment to Approved State Plan for Pandemic EBT: Children in School and/or Child Care, Summer 2022
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Summary:	(1) This document is a template to assist States in the development of an amendment to extend their approved State plan to operate Pandemic EBT for school children and for children in child care during summer 2022. (2) This document relates to Section 1101 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, 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 submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

Amendment to Approved State Plan for Pandemic EBT Children in School and/or Child Care, Summer 2022

1. **State:** Mississippi
2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA) as amended by the American Rescue Plan Act of 2022
3. **Here's what FNS needs from you:**
 - a. If a State chooses to elect the U.S. standard benefit¹, simply check the box below. Next, go to letter 'c' (*Estimated total amount of P-EBT benefits*) of the template.



By checking this box, we are indicating that our State will use the U.S. standard benefit for the covered summer period. We understand that USDA is only able to offer an interim standard benefit for children in child care at this time; USDA will provide states with additional guidance in mid to late June 2022 / early July that specifies the remaining amount of the USDA standard benefit for children in child care commensurate with the expiration date of the public health emergency.

- b. If a State chooses not to elect the U.S. standard benefit, FNS needs the following information:
 - The number of days for which benefits will be issued as part of the State's covered summer period; and
 - An explanation for how the State arrived at the number of days in the State's covered summer period. USDA will not approve a plan that does not tie the length of its covered summer period to the actual summer 2022 calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.
 - For the child care portion of the plan, USDA can only guarantee benefits through July 9. USDA considers this to be 1/2 through the typical State's covered summer period. For purposes of calculating an interim summer P-EBT benefit for children in child care, States may apply this 1/2 fraction to the full summer benefit that the State has calculated for school children.

¹ The U.S. standard benefit – as defined in Question #5 of FNS' Summer 2022 P-EBT Q&As – is equal to the median number of weekdays in a sample of each State's largest school districts multiplied by the daily P-EBT rate. For States in the continental U.S., that works out to a fixed summer benefit of \$391 per eligible child (55 days at \$7.10 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #15 for a complete set of standard benefit amounts.

- If the State believes that this date is more or less than 1/2 through the typical summer period of the State's schools, please support your position with data on the most common start dates of the summer break in the State's schools.
- As discussed in item #16 of USDA's P-EBT Summer 2022 Q&As, USDA will provide states with additional guidance by mid to late June / early July that specifies the remaining fraction of the full USDA standard benefit that States may provide to children in child care.

Response: [please use as much space as needed] **N/A**

- c. Estimated total amount of P-EBT benefits the State will issue within this amendment's date range. (Consult the appropriate table in Section 4, "Benefit Levels.")
- Estimated amount issued to school children: **\$147,016,000**
 - **376,000 children * standard benefit amount of \$391**
 - Estimated amount issued to non-school children in child care: **\$35,190,000**
 - **90,000 children * standard benefit amount of \$391**
- d. Estimated total number of children to which the State will issue P-EBT benefits.
- Estimated number of school children: **376,000**
 - Estimated number of non-school children in child care: **90,000**
- e. Tentative P-EBT issuance schedule (the dates on which Summer P-EBT benefits will be issued). Note that USDA encourages States to distribute summer benefits in two or even three issuances across the summer, to the extent practical.
- Please provide tentative issuance dates for the interim benefit for children in child care, and for any remaining amount that States will be able to issue following the release of additional guidance from USDA in mid to late June / early July.
 - School children: **October 2022**
 - Children in child care: **October 2022**
- f. Describe how the State will identify eligible school children and children in child care for summer P-EBT. You must address each of the following bulleted items, below, when responding.

For school-aged children:

- Describe how the State will identify school children who received P-EBT benefits during the last month of SY 21-22.

- Describe how the State will identify school children who were eligible for free or reduced price school meals under the NSLP and SBP in SY 21-22 but did not receive P-EBT benefits in the last month of the school year because they attended school in-person and benefitted from a free or reduced price meal service at school. This includes children who were eligible for F/RP meals during the school year and did not receive P-EBT benefits because the children attended school in-person during the school year.
- Describe how the State will identify children who are determined newly eligible for free or reduced price school meals during the covered summer period. States must provide an opportunity for families to apply for free or reduced price meals using the normal application process. States and SFAs should consider maintaining a minimum presence to process Free and Reduced Price Meal applications, perhaps on a part-time or weekly basis. Another alternative is for SFAs to accept new Free and Reduced Price Meal applications during the summer but only process them after the start of the new school year. Children determined eligible on applications *submitted prior to the end of the summer* could then be issued P-EBT benefits retroactively after the start of the new school year. (Note that it is preferable to process applications and issue benefits during the summer period that the benefits are intended to cover).

Local school districts will confirm student eligibility for Summer P-EBT by submitting files to the Mississippi Department of Education (MDE). Private schools will confirm eligibility by submitting files to the Mississippi Department of Human Services (MDHS). The file format will be the same one used to issue School Year 2020-21 and Summer 2021 PEBT benefits. Since the data requirements are the same used for the previous collection effort, we are expecting that local districts and private schools will be able to provide student information to MDE and MDHS (private schools only) in August 2022 (or earlier depending on plan approval). MDE will provide detailed data collection instructions, a data file template, and a data review checklist to local district staff prior to the data collection window. MDHS will provide similar resources to private school staff members. MDE expects that districts and schools will have the appropriate staff on hand to provide the needed data.

MDE is responsible for collecting all information regarding eligible children in the state's public schools 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; conducting a review of each district's data file to identify and resolve issues related to missing, corrupt, or improperly formatted data; compiling the district data into a single data file of non-duplicate eligible students; and working with MDHS to resolve any issues that arise.

MDE will instruct the local school districts and MDHS will instruct private schools to submit files containing only children eligible for the National School Lunch Program (NSLP) for the 2021-2022 school year as of the end of the school year. This will include

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 by MDE and to private schools by MDHS.

MDHS is responsible for collecting the student-level files from private schools, monitoring the EBT processing vendor, Conduent, and working with Conduent and MDE to resolve any issues that arise.

Conduent is responsible for creating benefit accounts for all eligible students who do not have existing accounts or cannot be matched to existing accounts, creating benefit files, coordinating with the card manufacturer, and re-issuing cards and correcting accounts as needed to resolve client concerns. Conduent call center staff are also responsible for handling all P-EBT calls, receiving email and chat messages from parents, supporting the resolution of parent-reported issues, and escalating parent-reported issues for review by districts and state agency staff as needed.

Conduent will issue the standard Summer benefit amount to all eligible K-12 students. Conduent will produce a file of all returned cards on a monthly basis beginning one month from the date of initial card issuance and submit these reports to MDHS and MDE. Conduent is responsible for logging and informing the state of any over issuances as well as any other issues they are unable to resolve.

P-EBT cards will be issued to each child. 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 initial transfer of student data. Only students who were both (1) enrolled in the district at the end of the 2021-22 school year and (2) categorized as eligible for free or reduced priced lunch under the National School Lunch Program will be included in the files.

Students are only eligible for Summer 2022 PEBT benefits in Mississippi if they were enrolled in a participating Mississippi school as of the last day of school during the 2021-22 school year. The state will communicate to school districts and private schools that receiving free school meals through the Seamless Summer Option (SSO) does not mean that a child is necessarily eligible for P-EBT summer benefits; children must be confirmed eligible for free or reduced price school meals under normal NSLP criteria (approved school meal application, direct certification, or enrollment in a CEP or Provision 2 or Provision 3 school). MDE and MDHS will engage with school districts, schools, and the public to encourage the submission, collection, and processing of NSLP applications prior to the end of the 2021-22 school year.

Schools were encouraged to continue to make Direct Certification matches throughout the 2021-2022 school year and to process any income applications submitted. If no data file is received from a school district by the end of the data collection window, MDE will follow up with the district and offer assistance. Similarly, MDHS will follow up with any private school that operates a NSLP

program that has not submitted a data file by the end of the data collection window. 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.

In October 2022, MDE will request that school districts submit a supplemental Summer P-EBT file of students determined eligible for free or reduced priced meals for the period between the end of School Year 2021-22 and July 31, 2022. MDE will ask schools to include all eligible students with applications submitted during that period even if the application was processed after the first day of school. Many files will be duplicates of the end of the year file. The MDHS contractor will compare the files and delete duplicates to prevent over-issuance of benefits. Benefits will be issued to students with NSLP applications approved during the summer in November 2022.

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. MDHS will identify and recoup any improper payments for P-EBT recipients in the manner outlined in the state's 2021-22 school year plan, Section 8: Over-issuance of P-EBT benefits.

For children in child care:

- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who received P-EBT child care benefits in the last month of the school year.
- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who would have received P-EBT child care benefits in the last month of the school year, but did not receive benefits because their child care facility was not closed or operating at reduced attendance or hours in that month, and neither their child care facility nor the child's residence was in the area of a school that was closed or operating at reduced attendance or hours in that month.
- Describe how the State will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period

Response: [please use as much space as needed]

In August 2022, MDHS will identify all children in Mississippi's SNAP eligibility system (MAVERICS) who were under age 6 as of September 1, 2021 and were members of a SNAP household during the summer benefit period, which is currently June 1, 2022 through July 31, 2022. Mississippi will issue the Summer 2022 benefit to all eligible SNAP children under 6 who were under 6 as of September 1, 2021 and were a member of a SNAP household during the covered summer period, meaning that their household received SNAP benefits in at least one month during this period. These benefits will be issued retroactively in October.

Some children who were under 6 and members of SNAP households were enrolled in Mississippi public schools during the 2021-22 school year (for example, in K-4 programs) and were eligible for NSLP. We expect these students to be listed on the district files submitted to MDE. To avoid issuance of duplicate benefits, MDE will include the "direct certification" flag in their data file submitted to MDHS, indicating which students are SNAP benefit recipients. Students within the MDE-submitted file who were under age 6 as of September 1, 2022 and are marked as a "direct certification" student will be compared against the file of SNAP children who are eligible for benefits, and any duplicate children will be removed prior to summer benefit processing. The MDE file and SNAP Under 6 file will also be compared for duplicate name and date of birth combinations and those cases will be reviewed before processing.

Children under 6 in families that did not participate in SNAP during the covered summer period and were not NSLP-eligible students in a K-12 school during the 2021-22 school year are not eligible for Summer 2022 P-EBT benefits.

4. Confirmation of remaining elements in the State's approved school plan and/or child care plan

- Please confirm that your P-EBT summer plan mirrors your approved school year 2021-2022 plan for EBT Processing and Benefit Issuance as well as Customer Service (Sections 7 and 8 of the [SY 21-22 State Plan Template for Pandemic EBT](#)). You do not need to describe in detail how you will handle these matters if your summer plan mirrors your approved school year plan(s); but if your summer plan materially differs from your approved school year plan(s), please describe how.

Response: [please use as much space as needed]

Mississippi submitted a child-care only School Year 2021-22 plan. Elements of the school year plan related to the issuance of benefits to SNAP children under 6 will also apply to the summer plan. Below, we provide additional detail related to the PEBT processing and benefit issuance for K-12 students who are not covered in the state's School Year 2021-22 plan.

Once the Summer 2022 P-EBT plan is approved, MDHS and MDE will simultaneously begin a social media campaign to announce our intent to issue Summer PEBT benefits, encourage parents to ensure their school(s)/district have an accurate mailing address on file, and share an anticipated issuance schedule. We anticipate that these actions will take place in July 2022 if Mississippi receives FNS plan approval prior to July 5, 2022.

Based on the state's experience in the past two rounds of P-EBT, MDHS and MDE are building more time into the 2021-22 summer plan for data collection, cleaning, quality assurance, and processing. MDE will instruct districts to transmit their student files in August. In order to ensure schools have adequate time to gather the required information, MDHS has provided MDE with the required format and structure for the student files to provide school staff the opportunity to coordinate fulfilling the request with their information technology (IT) staff. MDE and MDHS will provide public school district staff and private school staff with guidance documentation, a data review checklist, and training to support their preparation of the student-level data file.

Following district data submission, MDE staff will review the data files and conduct a series of quality control analyses. MDE will provide districts with a summary report based on the data submitted, showing the number of students in each of the district's schools who are eligible to receive benefits based on the data reported by the district. Districts will have the opportunity to review these reports and make corrections. MDE will also work with districts to correct any data issues in their files. Likewise, MDHS will be responsible for working with the state's private schools to collect and review data files. Private school staff members will also receive and have the opportunity to review a summary report based on the data they submitted.

In early September 2022, MDE will provide MDHS with a single data file containing student-level records from all public school districts throughout the state. MDE is responsible for ensuring that each eligible child is listed only once in the public school data file.

MDHS expects to issue Summer 2022 benefits to K-12 students and SNAP Under 6 children in early October 2022. Provided this Plan and the Conduent contract amendment are approved by July 30, 2022, we anticipate that the Call Center will be live in September 2022, and able to begin taking questions.

MDHS will issue Summer 2022 P-EBT benefits to all eligible K-12 students (SNAP and non-SNAP) on a P-EBT specific card. Furthermore, a P-EBT card will be issued for each child in the household. As MDHS is using a separate card only containing P-EBT benefits, no priority will be established. Summer benefits for SNAP Under 6 will be issued to P-EBT cards as well.

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.

Conduent will produce a file of all cards returned by mail on a monthly basis beginning one month from the date of initial card issuance and submit these reports to MDHS.

MDHS will partner with Conduent to provide a call center for households with P-EBT questions. The call center will be open from 8:30am to 5:30pm, Monday-Friday. Conduent will submit address update requests, eligibility review requests, and other types of client-

reported errors through an online reporting form. MDHS and MDE will work with local school districts or private schools as needed to handle all disputes and any issuance errors, with assistance from Conduent, if needed.

As no PEBT application is required, households will not be required to have internet access. In the original mail out, P-EBT cards will be mailed to the parent/guardian at the 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, Facebook, Twitter, and Instagram.

The information outlined will include:

- the P-EBT call center number
- the look of the P-EBT card
- that each eligible student will receive a new card, specifically for P-EBT
- the anticipated issuance schedule and anticipated benefit amount(s)

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

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 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. Each P-EBT card will be mailed with both a “card carrier” that contains information and a “buck slip” that contains additional detail for the family.

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

5. Benefit Levels

A. U.S. Standard Benefit

Standard Benefit for School Children

2022 Covered Summer Period	U.S. Standard P-EBT Benefit School Children		
	Median Length of Covered Summer Period (weekdays)	Daily P-EBT Rate	Standard Benefit
Contiguous U.S.	55	\$7.10	\$391
Alaska	55	11.44	629
Hawaii, Guam, Virgin Islands, Puerto Rico	55	8.28	455

Standard Benefit for Children in Child Care (Interim)

2022 Covered Summer Period	U.S. Standard P-EBT Benefit Children in Child Care (Interim)			
	Median Length of Covered Summer Period (weekdays)	Length of the Summer During the Public Health Emergency	Daily P-EBT Rate	Interim Standard Benefit
Contiguous U.S.	55	1/2	\$7.10	\$195
Alaska	55	1/2	11.44	315
Hawaii, Guam, Virgin Islands, Puerto Rico	55	1/2	8.28	228

State-Determined Benefit, Based on Daily Rate

Note: The daily benefit amount – \$7.10 – is only needed if a State elects to set its own covered summer period length; that is to say, if a State declines to use the U.S. standard benefit.

2022 Covered Summer Period	Free Reimbursements			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

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

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

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

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

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.

Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the State needs to make any significant changes to its Summer 2022 plan after approval, the State needs to submit an amendment to FNS that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:

DocuSigned by:

Dr. Kim S. Benton

Signature

Dr. Kim Benton

Mississippi Department of Education

DocuSigned by:

Robert G. Anderson

Signature

Mr. Robert G. Anderson, Executive Director

Mississippi Department of Human Services

Date of Request 6/21/22