

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

**Issuing Agency/Office:** FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program

**Title of Document:** State Plan for Pandemic EBT: Child Care Age Children, 2021-2022

**Document ID:**

**Z-RIN:**

**Date of Issuance:** August 26, 2021

**Replaces:** N/A

**Summary:** (1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

*The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660*

---

<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).

**State Plan for Pandemic EBT**  
**Child Care Age Children, 2021-2022**

**1. State: New Hampshire**

- 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 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 non-school children in child care
  
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
  - 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).
  - Children in childcare

**Response:**

- 3a. Proposed date range covered by this plan is September 1, 2021 – June 30, 2022
  
- 3b. New Hampshire Department of Health and Human Services (DHHS) estimates 12,853 unique children will be eligible for a \$38 monthly benefit, multiplied by up to 10 months of eligibility, for an estimated maximum total issuance of approximately \$3,499,867. The estimated average monthly amount of P-EBT for children in childcare is \$351,050.
  
- 3c. 12,853 children under age 6 are enrolled in SNAP. New Hampshire DHHS commits to inform FNS of any significant changes in expected P-EBT benefits issuance.
  
- 4d. P-EBT benefits for September 2021 - June 2022 are tentatively scheduled for 45 days after plan approval.

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

---

<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).

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

New Hampshire DHHS will conduct an assessments of statewide eligibility for issuing P-EBT benefits to this population, looking at Child and Adult Care Food Program (CACFP) Lunch Claim data (explained below) as an indicator of access to meals/child care for the SNAP Under 6 population. If the majority of SNAP Under 6 caseload (children receiving SNAP between September 2021 - June 2022 and under the age of 6 as of September 1, 2021) is found to have reduced access during each period, New Hampshire DHHS will proceed to the next step of monthly child-level benefit eligibility for that period. From analysis of the CACFP Lunch Claim data, provided by New Hampshire Education Department (NHED), NH DHHS determined the New Hampshire child care system operated at a significantly reduced capacity due to the COVID-19 pandemic during the period of September 2021 – April 2022. Simplifying assumption was used for the months May and June 2022 as CACFP data is not and will not be available prior to plan rollout; New Hampshire DHHS made the assumption that these months would reflect a decrease as all other prior months. The most current available data shows a 30% reduction in CACFP lunches served between September 2021 through April 2022, compared against pre-pandemic levels.

Informed by the data that shows reduced childcare access, New Hampshire DHHS proposes to determine all children enrolled in SNAP and under age 6 (as of September 1, 2021) eligible for P-EBT child care benefits throughout the state.

New Hampshire DHHS will identify all children in New Hampshire’s eligibility system, New HEIGHTS, who were under age 6 as of September 1, 2021, and will issue P-EBT benefits only for the months the child was enrolled in SNAP between September 2021 – June 2022. This age cutoff date is in alignment with New Hampshire’s State regulation that requires children turning age 6 on or before September 1 to attend school.

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		% Change Monthly	Eligible Children	100% of Benefit for each month: 7.10 * 18 Days	Amount per month per child	Total Benefit amount per month
19-Sep	71,618	21-Sep	51,872	28%	8,473	\$127.80	\$35.78	\$324,855
19-Oct	85,635	21-Oct	54,260	37%	8,682	\$127.80	\$47.29	\$332,868
19-Nov	72,373	21-Nov	52,471	27%	8,863	\$127.80	\$34.51	\$339,807
19-Dec	65,197	21-Dec	48,775	25%	8,879	\$127.80	\$31.95	\$340,421
20-Jan	82,868	22-Jan	48,061	42%	9,107	\$127.80	\$53.68	\$349,162
20-Feb	71,190	22-Feb	51,113	28%	9,178	\$127.80	\$35.78	\$351,885
19-Mar	83,464	22-Mar	68,832	18%	9,392	\$127.80	\$23.00	\$360,089

<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).

19-Apr	86,628	22-Apr	57,420	34%	9,578	\$127.80	\$43.45	\$367,221	
19-May	93,228	22-May	n/a	n/a	9,712	\$127.80	n/a	\$372,358	
19-Jun	73,718	22-Jun	n/a	n/a	9,421	\$127.80	n/a	\$361,201	
			<b>Average</b>	<b>30%</b>		<b>Average</b>	<b>\$38</b>	<b>\$351,050</b>	
				<b>Total Unique Children</b>	<b>12,853</b>			<b>Total Issuances</b>	<b>\$3,499,867</b>

How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

New Hampshire DHHS (SNAP agency) will determine P-EBT eligibility using its existing SNAP eligibility system, New HEIGHTS.

How will the State determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)

New Hampshire DHHS is not basing its childcare eligibility on proximity to area schools in this plan.

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?

New Hampshire DHHS is not basing its childcare eligibility on proximity to area schools in this plan.

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?

No, there are not.

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.)

New Hampshire DHHS will retroactively issue P-EBT benefits to children eligible under this child care plan, so no prospective eligibility determinations will be necessary. As stated

<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).

above, New Hampshire proposes to assess historical CACFP lunch data, provided by NHED, as a proxy for childcare access for the periods of September 2021 – April 2022 (Due to CACFP data available).

□ 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.)

New Hampshire DHHS proposes to set a standard monthly P-EBT childcare benefit at 30% of the average fully virtual benefit for school age children (average of 18 days = \$127.80 per month) for the months of September 2021 – April 2022. This equates to \$38.00 per month when rounded to the nearest whole dollar. This benefit level is based on New Hampshire DHHS's most recent analysis of CACFP data that shows participation is 30% below pre-pandemic levels in a year over-year comparison (2019 vs. 2021) for the period of September 2021 – April 2022. See above table for additional details on this calculation.

□ 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).

New Hampshire DHHS/Bureau of Family Assistance, utilizing and working with its eligibility system (New HEIGHTS) and Team, will identify the eligible SNAP under 6 population based on age requirements and monthly SNAP participation described above. New Hampshire is utilizing data that the New Hampshire Education Department, NHED, submits to FNS on CACFP lunch reimbursement claims which they will provide to New Hampshire DHHS/Bureau of Family Assistance for this purpose as well.

□ What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

As stated above, New Hampshire DHHS proposes two simplifying assumptions. First, New Hampshire DHHS proposes the simplifying assumption that a child who turns 6 after September 1, 2021 will remain in Child Care for the remainder of the school year. Second, New Hampshire DHHS proposes a simplifying assumption to determine all children under age 6 and enrolled in SNAP to be eligible for P-EBT benefits statewide, based on New Hampshire's DHHS analysis showing that New Hampshire's childcare system continues to operate at significantly reduced capacity across the state due to the COVID-19 pandemic. New Hampshire DHHS is utilizing data that NHED submits to FNS on CACFP. As shown in Table 1 above, the count of lunches served statewide from September 2021 – April 2022 was well below pre-pandemic levels of 2019.

## 5. Benefit Levels

□ 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.

New Hampshire DHHS proposes to set a standard monthly P-EBT Child Care benefit for the months of September 2021 – June 2022 at 30% of the average fully virtual benefit for child care age children (an average of 18 days = \$127.80 per month). This equates to \$38 per month (rounded up) for each of the months. This benefit level is based on New Hampshire's DHHS's most recent analysis of CACFP data, provided by NHED, that shows an average participation 30% below pre-pandemic levels throughout the September 2021 – April 2022.

---

<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).

## 6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).

The timeline must include the State's tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.

Examples of other possible milestones include, but are not limited to:

- State Education agency provides student data to SNAP State agency (Day #5)
- P-EBT hotline becomes active (Day #9)
- Public notice campaign begins (Day #10), etc.

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?

**Response:** Because P-EBT eligibility criteria for child care aged children requires current eligibility in a SNAP household, recipients will receive P-EBT benefits on their regular EBT Card.

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.

**Response:** P-EBT benefits are issued using a unique benefit code.

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.

**Response:** P-EBT benefits have a spend priority of 1.

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.

**Response:** P-EBT benefits follow the same expungement timeline as regular SNAP benefits.

During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned PEBT cards? How will you handle the need to issue replacement cards in these cases?

**Response:** New Hampshire has not had a large volume of P-EBT cards returned to the vendor during previous issuances. Only 2.2% of all P-EBT cards issued were returned. Undeliverable P-EBT cards will be returned to the vendor, who will then drop ship them monthly to the State Office EBT Administrator; once they arrive they will be deactivated and destroyed. It will be up to the household to call for replacement cards and to make any needed address updates.

Will you issue *new* P-EBT cards to existing P-EBT households?

**Response:** No, we will not be issuing new cards to those households.

---

<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).



○ If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?

**Response:** N/A

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

**Response:** If the P-EBT recipient no longer has their EBT card, they will call to order a replacement through EBT Customer Service.

**Timeline:**

The below dates are tentative and contingent upon other factors such as the date of USDA/FNS's approval of this plan.

### Day(s) Activities

0 USDA approves the State's plan

2 Finalized notices of eligibility provided to New HEIGHTS

45 Benefits issued for child care aged children

47 Benefits available on EBT cards

70 Contingency issuance for corrections

## 7. Customer Service

□ 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.

**Response:** New Hampshire DHHS has created a Customer Service Team (CST) and identified 8 staff members to perform various customer service functions. The CST includes: 5 Family Services Specialists (FSS), 2 administrative support staff, and one part-time SNAP EBT program staff. The FSSs will primarily work the P-EBT information line with support as needed from administrative staff. These staff will be using New HEIGHTS and Edge to answer incoming calls regarding incorrect benefit amounts, benefit denials, and to provide general information. CST will receive detailed information on the Child Care P-EBT plan and eligibility criteria to assist them in managing phone calls.

□ 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.

**Response:** N/A recipients are current SNAP recipients so issues/concerns would have been managed during SNAP application.

□ Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).

□ Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:

---

<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).

- 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)

#### *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 PEBT households.

10

- 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?

N/A

- 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.

[Because this is the CC P-EBT Plan and benefits are going to SNAP recipients only, New Hampshire DHHS will mail these specific households a detailed notice about the benefit.](#)

- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

N/A

### **8. 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 PEBT 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

---

<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 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 PEBT

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:**

Any potential benefit over-issuance that NH DHHS learns of will be tracked on spreadsheet for investigation and resolution. DHHS SNAP Coordinator will investigate the over-issuance by checking the information in the eligibility system and requesting additional documentation from the household if necessary. If, after investigation, it is determined that there was an over-issuance (for example, benefits were issued to the wrong household or benefits were issued to a household that was not entitled to them), a ticket will be created to provide the corrected issuance to the eligible household. A ticket will also be created to ensure that no additional benefits are issued to the ineligible household for future months. In no instances will NH DHHS reclaim P-EBT benefits by reducing a household's SNAP benefit. New Hampshire DHHS will notify FNS/USDA, via email, of any issuance error prior to taking any action describing the nature of the error, the amount of the error and the number of children affected by the error.

**9. Benefit Issuance Reporting**

NH DHHS 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.

**10. 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.

---

<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).

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.

### **11. 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.”

### **12. Civil Rights Statement**

New Hampshire 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.

### **13. Administration of State P-EBT Plan**

New Hampshire 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:**

\_\_\_\_\_  
Bridgette Dukette, SNAP Administrator

*Kelly Rambeau*      8.16.22

\_\_\_\_\_  
Kelly Rambeau, Administrator for Food and Nutrition Programs, NH Department of Education

**Date of Request:** 8/16/2022

<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).