

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

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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 children in schools or child care during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

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

State Plan for Pandemic EBT

Children in Child Care, 2021-2022

1. State: Ohio

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*¹ 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 child care

Response:

This plan covers August 2021-May 2022 for all children under the age of 6, on SNAP, and not in school (hereinafter referred to as SNAP Under 6). P-EBT benefit files will sent to the vendor as follows:

- The first issuance for benefits from August 2021 through January 2022 will be issued within 4 weeks of the plan approval.
- After this first issuance, Ohio will retroactively issue benefits monthly. As explained below, Ohio will be using the lunch claims data from the Child Care and Adult Feeding Program (CACFP) to calculate P-EBT benefits. Because this data is not final until 90 days after the month end, Ohio is retroactively issuing benefits. For example, February data will not be finalized until end of May, therefore, February benefits will be issued in June (assuming plan is approved and first issuance has been sent), March benefits will be issued in July, April benefits will be issued in August, and May benefits will be issued in September.

At the request of Ohio's grocers, ODJFS staggers the availability date of the benefits. The availability date depends on the date the benefit file is sent to the EBT vendor, how many days are remaining in the month, and the first letter of the last name of the child. More specifically, from the date of the

¹ 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).

benefit file generation, Ohio will divide 26 (number of letters in the alphabet) by the number of days remaining in that month. Then the availability of benefits will be staggered on those remaining days by groups of letters in the alphabet. For example, in June if the benefit file is sent on 6/20, there will be 10 days left in the month. 26 divided by 10 equals 2.6, rounded up to 3. Thus, the availability date for kids whose last name is starting with A, B, and C will be 6/20; availability date for D, E and F will be 6/21; availability date for G, H and I will be 6/22 and so on and so forth until the availability date for all alphabet letters (i.e. kids) is established. This process applies to all SNAP children under the age of 6 not in school. If for some reason benefit files get delayed beyond the end of the month, the benefit will be combined with the next month's benefit and follow the staggered issuance process. This is the same process for school age children in receipt of P-EBT benefits.

Based on CACFP data, Ohio estimates an average of 6 days of P-EBT benefits per month. When multiplied by \$7.10 per day, the average monthly benefit per child is \$42.60. Benefits will be issued for August 2021 through May 2022, totaling 10 months. This means a child on SNAP under 6 from August 2021 to May 2022 could receive a total of \$426 for the school year. With an estimated 210,616 children on SNAP under 6, this equates to an estimated monthly P-EBT issuance of \$8,972,241.60 and an estimated total P-EBT issuance for the school year of \$89,722,416.

Estimated total *number* of children to which the State will issue P-EBT benefits is 210,616.

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

Standard for P-EBT Eligibility

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

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

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)

- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response:

The following entities are involved in the administration of P-EBT:

- The Ohio Department of Job and Family Services (ODJFS) is responsible for the issuance of P-EBT benefits, providing the data for children on SNAP under 6, and providing notices to clients.
- The Ohio Department of Education (ODE) is responsible for the administration of the Child and Adult Care Food Program and processing lunch claims and collection of claims data.
- The Management Council of the Ohio Education Computer Network (Management Council) is responsible for compiling P-EBT data into one file on a monthly basis and sending to ODJFS. Additionally, they manage the customer service and support call center.

Ohio will use CACFP lunch claim data from ODE as an indicator of reduced access to lunches for children on SNAP Under 6 population. Specifically, for the benefit month in the current 2021-2022 school year, Ohio will compare the lunch claims in that same month in 2019, then determine the percentage reduction from 2019 to the current school year. One exception will be that January and February will compare data from 2020 and 2022. "Lunch claims data" is lunch claims for CACFP child care centers and family day care homes minus at-risk lunches and adult center lunches. Ohio only has statewide CACFP lunch claim data and does not have access to regional data. Claims are reported and paid at the Sponsor level for the Ohio Child and Adult Care Food Program. This does not allow the ability to break down the lunch claims data into regions. For example, a sponsor that is headquartered in Columbus with 400 sites statewide would have all lunch counts roll up and be reported under the program sponsor's headquarter

location in Columbus. A reduction in claims will be considered a reduction in access to child care. If the CACFP data shows reduced lunch claims during any month between August 1, 2021 through, May 31, 2022, Ohio will proceed to the next step of determining the child-level benefit for that month.

To determine the monthly benefit, Ohio will calculate the percentage reduction in CACFP lunch claims for the month. Then the maximum number of remote learning days in the month (18 days based on 180 required school hours divided by 10 months) will be multiplied by the CACFP percentage to calculate the number of days the percentage reflects. For example, if there are 20 days of remote learning possible in a specific month, and the reduction of CACFP claims was 20%, then the number of P-EBT days for children on SNAP under 6 would be 4 days for that month. The daily rate of \$7.10 would be multiplied by 4 days for a P-EBT benefit of \$28.40 for that month.

A child is considered enrolled in a covered child care facility if the child is a member of a household that is enrolled in SNAP in the benefit month. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.) Ohio will identify all children in Ohio's eligibility system (Ohio Benefits) who were under age 6 as of August 1, 2021 and will issue P-EBT benefits only for the months the child was enrolled in SNAP between August 2021 – May 2022 and the CACFP data shows a reduction in lunch claims. A child who turns 6 after August 1, 2021 and did not receive P-EBT under the 2021-2022 School Children P-EBT plan for the months they received SNAP benefits will be eligible under the P-EBT Child Care plan through May 31, 2022, under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year. Ohio understands that a child's eligibility for P-EBT benefits ends when a child's SNAP enrollment ends. Ohio will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care benefits by comparing the SNAP under 6 children against the school age P-EBT data for that same month. Benefits for school age children are always issued the month after the benefit month (for example, February benefits were issued in March) so we will always have the school age benefit file to compare the children on SNAP under 6.

5. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$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>

- 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:

As described above, to determine the monthly benefit for children on SNAP under 6, Ohio will calculate the percentage reduction in CACFP lunch claims for the month. Then the maximum number of remote learning days possible for schools in the month will be multiplied by the CACFP percentage to calculate the number of days the percentage reflects. For example, if there are 20 days of remote learning possible in a specific month, and the reduction of CACFP claims was 20%, then the number of P-EBT days for children on SNAP under 6 would be 4 days for that month. The daily rate of \$7.10 would be multiplied by 4 days for a P-EBT benefit of \$28.40 for that month. In determining the percentage reduction in claims, Ohio used standard rounding to the whole number; for determining the number of P-EBT days, Ohio used standard rounding to the whole number.

School Year 2018-2019 Month	# of Lunches Claimed	School Year 2021-2022 Month	# of Lunches Claimed	% Reduction in CACFP claims (std. rounding)	Maximum Remote Learning Days in the Month	Converted # of P-EBT days (standard rounding)	Monthly P-EBT Benefit
August 2019	1,447,414	August 2021	1,105,989	24%	18	4	\$28.40
September 2019	1,343,724	September 2021	1,008,306	25%	18	5	\$35.50
October 2019	1,571,919	October 2021	1,034,277	34%	18	6	\$42.60

November 2019	1,296,631	November 2021	1,026,056	21%	18	4	\$28.40
December 2019	1,277,183	December 2021	946,674	26%	18	5	\$35.50
January 2020	1,485,467	January 2022	914,298	39%	18	7	\$49.70

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?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle 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:

Once Ohio receives approval of its plan, within 4 weeks the benefits for August 2021-January 2022 will be issued. After this first issuance, Ohio will retroactively issue benefits monthly. As explained below, Ohio will be using lunch claim data from the Child and Adult Care Food Program (CACFP) to calculate P-EBT benefits. Because this data is not final until 90 days after the month end, Ohio is retroactively issuing benefits. For example, February data will not be finalized until the end of May, therefore, February benefits will be issued in June (assuming plan is approved and first issuance has been sent), March benefits will be issued in July, April benefits will be issued in August, and May benefits will be issued in September.

The sub-benefit type will be P-EBT and the availability date will be determined by the child's last name (as described in section 3 above). The P-EBT benefit will have the highest spend priority amongst all benefit types and will follow the standard expungement rules.

7. Customer Service

Recommended Standard for Household Support

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

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

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

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

In order to communicate with families about the changes to the P-EBT program for children on SNAP under 6, ODJFS will develop a Q&A document. The document will explain eligibility, how benefits can or cannot be used, and the customer service number to call with questions. The Q&A document will be translated into other languages, including but not limited to Spanish and Somali. ODJFS will post both the English and non-English versions of the documents on its website and will share them with our advocate partners. ODJFS will also use social media to announce the first issuance under this plan.

ODJFS implemented functionality in its SNAP eligibility system to assist in automating the file process to the EBT vendor. This functionality will produce a notice for each child that is issued a P-EBT benefit. It will provide the following information: child's name, child's DOB, benefit amount, benefit month, benefit issuance date, whether the benefit was issued to an active SNAP account or to a P-EBT card, and a brief description of what benefits can and cannot be used for. It will also provide a phone number for clients to call with questions about the program or the benefits. This notice will be issued with each monthly benefit issuance. It will also contain static

text in both Spanish and Somali providing the customer service phone number to call for translation assistance.

The P-EBT customer service line has been operational since May 2020 and will continue to be operational through at least September 2022. Management Council manages all customer service calls as it is best situated to research benefit issues. It will be responsible for handling all the phone support for parents regarding P-EBT benefits, including benefit disputes and issuance errors. Management Council will provide, host, and manage the Service Desk software that will track each customer contact and child query being handled by Management Council Service Desk. Management Council will provide JFS and ODE service desk reports reflecting activity and performance. Management Council has access to translation services to assist limited-English proficient families.

If a family contacts support stating a belief that their child should have received a benefit, Management Council will collect the relevant information and work with ODJFS to determine if eligibility exists.

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 P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your State will manage P-EBT payment errors.

Response:

Management Council and ODJFS will log and track over-issuances identified. If an overpayment occurs, Ohio proposes to reduce future P-EBT benefits by the amount of the overpayment until it is repaid in full upon approval from FNS. If the benefit cannot be repaid in full by offsetting with future benefits, then Ohio will not seek recovery of the remaining amount. Since benefits are issued a monthly basis, the most an overpayment for a month would be approximately \$42 per month (based on an average of 6 days of benefits per month). The state would incur more administrative costs in establishing the claim and seeking recovery than the cost of the actual overpayment.

When reducing P-EBT benefits to repay an overpayment, Ohio would notify the families through a robo-call or robo-text that would provide the specific amount of the overpayment and the amount of benefits reduced. If the schools did not provide a valid phone number in the data, Management Council will work with the schools to make contact with the family to provide notice of the overpayment and offset of current benefits.

Ohio will notify USDA of all overissuances and will not attempt to reclaim benefits from households before consulting with USDA.

9. 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.

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.

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

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.

13. 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:

Betsy Suver Betsy Suver, SNAP Director

Signature
Print Name and Title

Stephanie K. Didders ^(BPF)

Signature
Print Name and Title

Date of Request 6/15/22