

**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:** Missouri
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
- 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

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.

Response:

Missouri commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

- a. The State will build off of its previously approved P-EBT plan for March, April and May 2020. The date range for the current plan for school children is September 1, 2020 through May 31, 2021 and for children in child care is from October 1, 2020 through May 31, 2021.
- b. The State makes the following estimates:
 - Monthly issuances of \$24,318,705
 - Estimated monthly amount issued to school children in SNAP households is \$7,366,923
 - Estimated monthly amount issued to school children in non-SNAP households is \$3,343,117
 - Estimated monthly amount issued to non-school children in child care \$13,608,664
 - Total issuance of \$205,259,672 (monthly estimate multiplied by the nine months for school children and eight months for child care children)
 - Estimated total amount issued to school children in SNAP households is \$66,302,307
 - Estimated total amount issued to school children in non-SNAP households is \$30,088,053
 - Estimated total amount issued to children in SNAP households in child care is \$108,869,312
 - These estimates reflect the revised daily rate of \$6.82 and using an estimate that 30% of the children from spring 2020 issuance used the hybrid learning model and 10% of the were in a virtual learning model based on information received from the Department of Elementary and Secondary Education (DESE); the remainder were in seat. The number for child care children is based on a model that 75% of the child care children in the state were hybrid and 25% were eligible for a virtual mode using an assumption that child care children are eligible based on contiguous counties.
- c. The estimated total number of children to which the State will issue P-EBT benefits is approximately 268,513.
 - Estimated number of school children in SNAP households based on spring 2020 figures is 81,500
 - Estimated number of school children in non-SNAP households based on spring 2020 figures is 36,985
 - Estimated number of SNAP non-school children in child care is 150,028
- d. The estimated total amount of administrative funds the State needs to complete the work for this plan is \$7,543,858.

Missouri intends to issue P-EBT benefits retroactively as a lump sum for all eligible participants. As applications are received for school age children P-EBT cases will be set up and benefits issued retroactively for all months.

For SNAP children in child care, the administrative flexibility that allows issuing benefits back to October for children whose SNAP enrollment began on or before May would simplify the process to identify and issue benefits to this population. SNAP enrollment for this population has remained relatively constant during the timeframe of the proposed plan. Missouri will utilize its integrated eligibility system to ensure benefits are not issued to any child for any month after their SNAP enrollment ends if it ends prior to May, 2021.

Missouri currently staggers SNAP benefits over 22 days in the month, as a result participants receiving P-EBT benefits will not cause inventory issues with retailers.

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:

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

- The Department of Social Services, Family Support Division (FSD) is responsible for eligibility determination for P-EBT, the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.
- The Department of Elementary and Secondary Education (DESE), in collaboration with the local school districts, is responsible for providing data on children eligible for National School Lunch Program (NSLP) and collecting student learning mode classifications.

FSD and DESE consulted on the development of this plan. Weekly workgroup meetings are held with representatives from both agencies. To identify eligible school children and confirm their eligibility, Missouri will use data provided by the school districts directly. DESE will instruct school districts to provide the FSD with a list of all students eligible for free or reduced-price meals. This list will be developed using the SY19-20 list of free and reduced-price eligible students as its base. DESE will instruct the districts to remove students who have graduated or moved out of district from this list and add students newly eligible by way of direct certification, other categorical eligibility sources or via the SY20-21 National NSLP approved household applications.

FSD will require that SNAP and Non-SNAP families from eligible school districts to apply for benefits, based on lessons learned from previous P-EBT issuances during the 2019-2020 school year. School Districts, whose learning mode is virtual or hybrid, will receive information on how families are able to access the application on-line.

FSD will use hourly and intermittent (H&I) staff to triage and troubleshoot P-EBT applications. They will train contracted staff and serve as team leads.

FSD will use a contractor to process the applications. The contractor will verify through the eligibility system if the child is P-EBT eligible, if P-EBT eligible the contractor will determine the learning mode of the school attended and issue the appropriate amount of benefits.

If the child is not P-EBT eligible the contractor will check the NSLP data provided by the appropriate school district. If the child is confirmed NSLP eligible, based on data from the school district, the contractor will issue benefits based on the learning mode of the school attended.

Data on school district learning modes, including data on each school within the district, was collected in May of 2021.

If the child is not included in the data of eligible NSLP children and does not meet other categorically eligible criteria, the contractor will refer the family to DESE to complete the required NSLP evaluation within 10 days.

A uniform process will be used for all students (SNAP participants and non-SNAP participants) to confirm each student's lack of access to meals at school. Public school districts will track a student's learning mode (i.e. virtual, hybrid or fully in-person). For the purposes of P-EBT, private schools who administer NSLP will be required to track a student's learning mode and provide that information to FSD.

A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. Missouri intends to leverage simplifying assumptions to issue two benefit amounts, one amount for hybrid students and one amount for virtual students. Based on guidance dated January 29, 2021; states may calculate a uniform P-EBT benefit (more details are provided in the Benefit Level section).

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:

A survey of school districts conducted in May 2021 was used to determine if school was closed or operating with reduced attendance or hours for a minimum of 5 consecutive days during the 2020-2021 school year. The survey identified the learning mode of the school: in-seat, hybrid, or virtual by each month.

Data is used at the school level due to the large number of school districts and schools within a district. To base benefits on grade or individual child level would be burdensome and would delay the issuance of P-EBT benefits to children.

School learning modes are defined below:

- An in-seat learning mode is one that does not meet the five consecutive day threshold and the children were present in school with no virtual or hybrid learning,
- A hybrid school is one that meets the five consecutive day threshold and children were in-seat for either a fixed 2 or 3 day per week schedule, and virtual the other days; this status is based on the schedule of the majority of children in that school.
- A fully virtual school is one where a majority of kids are virtual every day of the week. The only exception is a school starts the month as hybrid or in-person, but closes to in-person instruction before the midway point of the month. This status is based on the schedule of the majority of children in that school.

By collecting data monthly, school districts are able to report which schools had a change in learning mode.

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:

Missouri will use its integrated eligibility system to identify SNAP child care children under age 6 and SNAP children age 6 who attended child care full time during the day by county of residence or contiguous county in which a school district is closed or is operating with reduced attendance or hours for at least 5 consecutive days. Identifying the children age 6 attending full time child care during daytime hours will enable the state to ensure the state is not over issuing benefits to these children.

Missouri makes a simplifying assumption that contiguous counties are operating in the same manner as facilities in which a school district is closed or operating with reduced hours or attendance for at least 5 consecutive days.

Missouri does not operate under a statewide public health order, and local public health ordinances which required reduced capacity in buildings also had schools which were closed or operating with reduced attendance.

As described in section 4.B, school districts will complete a survey to notify the State which learning mode a school operated under each month from October 2020 through May 2021.

Missouri will issue virtual benefits for children in county with at least one fully virtual school. Children in a county with no fully virtual schools but where there is at least one hybrid school will receive the hybrid benefit. This simplifying assumption is made due to limitations of the eligibility system in providing the data needed, such as school districts for residence of children who are not yet enrolled in school. The system also does not track the school districts where child care facilities are located.

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:

In an effort to structure the program in a way that is easier for the school districts to handle and easily communicated to participants and stakeholders, Missouri intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct amounts, one amount for students enrolled in a virtual learning mode and one amount for students enrolled in a hybrid learning mode.

The virtual P-EBT benefit amount of \$129.58 was calculated using an average of 19 school days per month.

Missouri schools provide approximately 174 days of learning during a school year excluding holidays, teacher meetings, and inclement weather days the school calendar is set by the individual districts, so a district beginning school in mid-August will be out by mid-May for an approximate 9 month school year. Missouri believes using 19 days (174

days/9 months = 19.33 rounded down) to calculate the fully virtual amount is reasonable. This allows Missouri to issue one consistent benefit of \$129.58 per month per child, mitigating household confusion and thus reducing inquiries to the agency's call center.

Missouri proposes the hybrid benefit amount equal to \$77.75 or 60% of the fully virtual amount.

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:

The tentative approach is as follows:

Day 0 – Plan approval is received. Continue working with and finalizing contract amendment with EBT vendor (FIS).

Day 1 – DESE informs school districts of the reporting criteria and submission instructions.

Day 5 – Begin public awareness campaign.

Day 10 – Deadline for school districts to submit surveys. Applications are available to families for their children. FSD Call Center staff are informed that P-EBT is made available to the public and are provided information to respond to inquiries. Q&A for call center staff will be updated as needed.

Day 11 – Application receipt begins. Applications will be postmarked no later than July 31, 2021 and they will be processed in date order as received. Contractor employees begin uploading applications and approving in the eligibility system. If the contract with the EBT vendor is complete, P-EBT cards and benefits are issued. If the contract amendment is not complete, cards and benefits will be issued upon completion.

Day 20 – P-EBT benefits for children in child care who did not have to provide additional eligibility verification are loaded on to SNAP EBT cards for the head of household in which the child is currently receiving benefits. If the child is not currently receiving SNAP benefits the benefit will be loaded to the SNAP EBT card for the case on which the child was last eligible.

Missouri intends to use a distribution model based on lessons learned from P-EBT issued in spring of 2020. School age children will receive their P-EBT benefits on a unique P-EBT card and child care children will receive P-EBT benefits on the SNAP card for the case in which they receive SNAP benefits. P-EBT benefits will follow the same expungement rules Missouri follows for SNAP.

Missouri will continue its use of the P-EBT benefit codes which were modified specifically for P-EBT. The P-EBT draw/spend priority is ahead of D-SNAP and SNAP. Undeliverable P-EBT cards will be returned to the state who will process them in the same manner as undeliverable EBT cards. This information will be shared with school districts for outreach purposes (see proposal below in the “Customer Service” section).

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:

Missouri is committed to timely and accurate communication to all eligible households. The FSD Call Center will continue to serve as front line customer support. FSD provides language translation services for those who have limited English proficiency. To aid FSD staff in assisting callers, a P-EBT memorandum will be issued to call center staff and field staff providing an overview of the program, eligibility requirements, location of the application and ways to submit an application. FSD Program and Policy email address of ColeFSPolicy@dss.mo.gov can be used by National Office to direct inquiries.

Missouri is committed to equitable access for all eligible families regardless of circumstances. FSD will work with each school district's homeless liaison to address issues related to families who have not received their cards due to outdated addresses or lack of permanent address. School districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement. Families will need to sign an attestation that they received the card. The school district will be required to submit to FSD attestations and any cards that were not picked up. Collection of social security numbers (SSN) is not necessary to apply for NSLP, therefore children without SSNs may pursue eligibility for P-EBT through a NSLP application.

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

Direct Communication: Working with DESE and school districts, potentially eligible P-EBT children will receive a notice directing them to the DESE website for the application and general information.

The FSD website will provide

- A link to the application,
- General information including:
 - how to request a replacement card,
 - where P-EBT can be used,
 - who to contact for questions, and;
 - how to opt out of receiving P-EBT
 - information regarding foods that can be purchased with P-EBT benefits,

- explanations of violations and penalties (particularly trafficking) and that benefits are non-transferrable.

The P-EBT mailer included with the P-EBT card will include information on where to go for step-by-step instructions on how to PIN their card.

P-EBT cards can be replaced in the same manner as EBT cards. Participants can call the number of the FIS Call Center at 800-997-7777 which is provided to them when they receive their card or they can call the FSD Call Center at 855-373-4636.

If the benefits are disputed for any reason, the P-EBT staff will research the concerns. Each case/concern will be handled individually. If determined that the original P-EBT benefits were issued incorrectly or were denied, the staff member will ensure that the child receives the correct amount of P-EBT benefits. If there is an over issuance of benefits the employee's supervisory staff will review and refer to the Program Integrity Unit.

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:

Missouri, by taking an approach of issuance after the fact hopes to avoid over issuances in nearly all cases.

P-EBT benefits for children in school will be issued based on an application filled out by the participant's parent/caretaker. P-EBT benefits for SNAP children in child care will be issued by the eligibility system after identifying eligible children.

DSS will make all reasonable efforts to detect over-issuances and improper payments. For instances where the overpayments occur due to system error or other assignment errors the benefit will be recouped by FSD if readily available. If the benefit has been spent, the case may be referred to the Missouri Program Integrity Unit (PIU).

Any other potential benefit over-issuance will be referred to the PIU after it has been reviewed and validated by the employee's supervisory staff. FSD will coordinate with relevant state agencies and local authorities for case data collection and analysis, conduct follow up inquiries as appropriate, and refer cases for final claims processing.

In no instances will the Missouri reclaim P-EBT benefits by reducing a household's SNAP benefit.

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, and Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

13. Civil Rights Statement

The State will continue to comply with civil rights requirements, 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:

Signature

Kim R. Evans, Director of FSD

Date of Request