

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and/or Child Care, Summer 2023
Document ID:	
Z-RIN:	
Date of Issuance:	January 11, 2023
Replaces:	N/A
Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328)

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

The submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023¹**

*Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 **without** a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.*

1. State: Arizona

2. Primary Citation: Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

- a.** Estimated total amount of P-EBT benefits the state will issue within this amendment’s date range. (Consult the appropriate table in Section 4, “Benefit Levels.”)

Estimated amount issued to school children
Arizona estimates **\$66,000,000** in P-EBT benefits

- b.** Estimated total number of children to which the state will issue P-EBT benefits.

Estimated number of school children
Arizona estimates **550,000** school children will be eligible

- c.** Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.

- With the public health emergency expected to end on May 11, 2023, Arizona will not be applying for children in childcare for the 2023 Summer P-EBT benefit. The Arizona State Plan will be for School Children only. In the event the public health emergency does not end on May 11, 2023, and is extended or continues into the 2023 Summer covered period, Arizona will seek guidance from USDA on completing a plan amendment to add children in childcare at that time.

¹ Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

- School children
Late July/Early August 2023 for school children enrolled in school and attending a National School Lunch Program (NSLP) participating school at the end of the school year immediately preceding the summer
Mid-August/Early September 2023 catch up run

Please provide tentative issuance dates for the *potential* benefit for children in child care. Note: USDA will release additional guidance before the start of the summer to confirm the availability and finalize the value of the summer 2023 P-EBT benefit for children in child care.

- With the public health emergency expected to end on May 11, 2023, Arizona will not be applying for children in childcare for the 2023 Summer P-EBT benefit. The Arizona State Plan will be for School Children only. In the event the public health emergency does not end on May 11, 2023, and is extended or continues into the 2023 Summer covered period, Arizona will seek guidance from USDA on completing a plan amendment to add children in childcare at that time.

- d. Names of state agencies involved in administering this plan.
Arizona Department of Education (ADE)
Arizona Department of Economic Security (ADES)

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 (May 2023) who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in the school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023,

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

Arizona will determine school children who were eligible for free or reduced-price meals under the NSLP and SBP in SY 22-23 by having School Food Authorities (SFA) submit Summer P-EBT eligible students to the Arizona Department of Education (ADE) electronically, via the CNP P-EBT Eligibility application database, for purposes of Summer P-EBT issuance.

Beginning in **May/June 2023**, authorized SFAs will have the ability to enter the application database and for each NSLP participating site, upload Summer P-EBT eligible students to ADE.

The CNP P-EBT Eligibility portal contains an eligibility attestation section with a checkbox that the SFA must select prior to the system adding an eligible child(ren). By selecting the checkbox, the user attests the child(ren) was directly certified, enrolled in a Provision 2 or 3, or Community Eligibility Provision participating site, or eligible for free or reduced-price meals in May 2023 or the last calendar month of the school year.

Eligible students, must be on file as enrolled in an NSLP school in May 2023 or the last calendar month of the school year and meet one of the following criteria:

Students are certified by the SFA for free/reduced-price meal benefits via an NSLP household application anytime from July 1, 2022, through the last day of the NSLP site's academic school year or June 30, 2023, whichever occurs earlier.

Student is directly certified via the Arizona Direct Certification* system anytime from July 1, 2022 through the last day of the NSLP site's academic school year or June 30, 2023, whichever occurs earlier.

*AZ's Direct Certification system houses SNAP, TANF participant data, as well as, students who are determined by the state or local officials to be participating in the McKinney Vento Homeless or Migrant Education Programs, a Runaway student, or a student in Foster Care. Directly certified students will be automatically coded as eligible by ADE in the Summer portal.

- Students are enrolled in an NSLP/SBP participating school on an active Special Provision Option cycle for School Year 22-23 for Provision 2, Provision 3 or CEP. Students enrolled in SPO sites will be automatically coded as eligible by ADE in the Summer portal.

Arizona Department of Economic Security (ADES) will use a data file from ADE, which will include all known eligible children enrolled in NSLP/SBP school with a free / reduced-price eligibility status and the enrollment end date reflective of the last calendar month of the school year to issue benefits. First, ADE will determine eligible students based on their end enrollment date as provided by the SFA. Students must have an enrollment end date equal to the last calendar month of the school year; free / reduced-price eligible students who were enrolled in an NSLP school during the last calendar month of the school year would meet the eligibility for Summer P-EBT and be included in the file if the student was also determined to be free / reduced-price eligible for school meals during School Year 2022-2023

- For schools that report to AzEDS (ADE's public school student database), ADE will use data reported as of the last day of the NSLP site's academic school year for each student's corresponding NSLP site enrollment end date for SY22-23.
- For non-public schools, ADE will use the SFA provided data files collected via a manual submission process to ADE. The data request will require SFAs to submit the NSLP site enrollment end date for each student listed as enrolled in SY22-23. SFAs are instructed to submit only P-EBT eligible students.

These children will need P-EBT specific cases built 1 per eligible child in the child's name, 1 letter per eligible child, and 1 P-EBT card sent to the eligible child if one has not already been issued.

Arizona will reuse cases and EBT cards from the previous year where possible.

- Describe how the state will ensure that households with children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

Response: [please use as much space as needed]

Schools are responsible for processing applications received during the 2022-2023 academic school year, spanning from July 1st, 2022 through the end of the last day of the NSLP site's academic school year. SFAs will submit the student data to ADE via the P-EBT Summer portal no later than Friday, **June 30, 2023**. ADE will send the first Summer P-EBT eligibility file to AZDES no later than **July 14th, 2023**. SFAs will have until **August 4, 2023** to provide any final records that were previously missed. ADE will provide to ADES a second file with late SFA submissions no later than **August 14, 2023** to be processed.

5. Summer P-EBT for children in child care:

- Describe how the state will identify children under age 6² who are enrolled in SNAP during the covered summer period.

With the public health emergency expected to end on May 11, 2023, Arizona will not be applying for children in childcare for the 2023 Summer P-EBT benefit. The Arizona State Plan will be for School Children only. In the event the public health emergency does not end on May 11, 2023, and is extended or continues into the 2023 Summer covered period, Arizona will seek guidance from USDA on completing a plan amendment to add children in childcare at that time.

² See school year 2022-2023 P-EBT Q&A #29 ([click here](#)) for additional information on children who reach their 6th birthday after the start of school year 2022-2023.

- Describe how the state will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period.

Due to the public health emergency expected to end on May 11, 2023, Arizona will not be applying for children in childcare for the 2023 Summer P-EBT benefit. The Arizona State Plan will be for School Children only. In the event the public health emergency does not end on May 11, 2023, and is extended or continues into the 2023 Summer covered period, Arizona will seek guidance from USDA on completing a plan amendment to add children in childcare at that time.

6. Benefit Levels

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139

(USDA will provide additional guidance at a later date on pro-rated summer child care benefits in the event that the PHE extends into the summer months but ends prior to the end of the summer.)

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 2023 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 past years, 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.

- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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.

The below dates are tentative and contingent upon other factors.

March '23- FNS plan approved/Programming setup/Vendor Agreement in place
ISSUANCE-Late July/Early August '23- 1st issuance - Eligible School Children Provided by ADE thus far

Late August/Early September '23 - FINAL Issuance Catch Up run for new applications and Corrections for School Children

P-EBT Issuance Schedule by Case Last Name:

Last name's first letter is	Benefits available
A-B	*15th of the month
C-D	16th of the month
E-F	17th of the month
G-H	18th of the month
I-J	19th of the month
K-L	20th of the month
M-N	21st of the month
O-P	22nd of the month
Q-R	23rd of the month
S-T	24th of the month

U-V	25th of the month
W-X	26th of the month
Y-Z	27th of the month

*Estimated, may need to be sooner or later depending on when 15th falls as processing needs to occur in the middle of the week.

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?
As was done for the 21-22 school year and summer 2022, all SNAP Under 6 P-EBT eligible children will be issued P-EBT benefits to the SNAP case/ EBT card they were actively receiving SNAP benefits on during a particular month within the covered period. School Children SNAP and NON-SNAP will reuse a special P-EBT card from last year (Summer P-EBT 2022) and AZ will issue new cards to new cases in 2023.
- 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 P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
AZ will use FSPV to designate P-EBT issuances.
- 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.
FSPV P-EBT benefit type will be priority 1 spend.
- 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.
AZ will follow SNAP expungement rules.
- 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?
Returned P-EBT cards will be shredded at the processor and put on an undeliverable report to be supplied to the state. In addition a hotline will be in place for parents to call in and request a replacement card either through the mail or over the counter at a local office when funds are still available to be used. AZDES will review return card reports.
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Arizona will not issue new P-EBT cards unless it is a NEW P-EBT case. In the event the household no longer has their P-EBT they can call us for a replacement card through the mail or pick up a replacement card at a local DES office.

8. Customer Service

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- 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 to 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)

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

Response: [please use as much space as needed]

- AZDES will send a notification to each receiving household:
 - A description of P-EBT
 - 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
 - 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)
 - Children PEBT is being issued to
 - Expected issuance amount

- AZDES will maintain a PO Box for handling various needed reviews on cases already built:
 - PO BOX 19009 Phoenix, AZ 85005
 - Items that will be considered proof of custody: Judicial decree, court documents, will, enrollment paperwork, affidavit of guardianship

- AZDES Call Center will be instructed to refer general disputes or issuance errors to CLU (Client Liaison Unit) or Level 2 P-EBT support team for remediation
 - Ability to reissue cards
 - Add/remove children from cases
 - Update date of birth (DOB) or other demographic information
 - Update Primary assigned to case or update Primary Name
 - Research denials
 - Call Backs/Emails to Beneficiaries
 - Research Payment Disputes - Any underpayments will be reviewed and determined by an administrative review completed by The Client Liaison Unit until September 29, 2023.

- If issuance is in error and has been spent, Level 2 support or AZ EBT Team will
 - Record error on OverPayment(OP) worksheet
 - Reissue corrected benefits to claimant if not the same individual
 - Record OP note in the case with the OP, ONLY once guidance is confirmed from FNS

- If issuance not spent Level 2 Support or AZ EBT Team:
 - Move to correct case
 - Keep a log of these events for tracking purposes

- Research by CLU team Level 2 Support
 - Administrative reviews that can't be resolved with submitted paperwork

- PRIOR P-EBT years 2019/2020, 2020/2021, 2021/2022 and Summer 2022 will be considered closed - any corrections and support will center around the 2022/2023 school year for Child Care ONLY forward. Only exceptions will be making address corrections and/or card replacements on cases with balances available.

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

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:

For instances where overpayments occur due to system error or other assignment errors the benefit may be recouped by AZDES for that case if readily available and a standard note recorded in the case about the action taken. If the benefit has been spent, the case may be referred to the AZDES Office of Accounts Receivable and Collections(OARC) after consultation with FNS and AD approval. P-EBT benefits will not be reclaimed or recouped by reducing the household's SNAP benefits. Prior to any referrals for overpayments, AZDES will coordinate with FNS for updated guidance, based on the dollar amount and reason for the overissuance.

Based on FNS guidance, AZDES will act accordingly and capture the benefits in a separate spreadsheet supplied by SWRO(South West Regional Office)

Underpayments: Starting in August 2023 or sooner if possible, AZDES will begin to accept underpayment claims from SNAP clients to research and resolve for children under 6 not paid or underpaid due to accepted updated information. If the claim is approved and processed, AZDES will issue the difference in a subsequent issuance cycle as a supplemental payment. Individual calls or contacts will be handled by the local office/Customer Service line or CLU units.

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

12. Release of Information

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

13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

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

Signature
[Print Name and Title]

Signature
[Print Name and Title]

Date of Request: _____