

**State Plan for Pandemic EBT
Children in School and Child Care, 2022-2023**

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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) 2022-2023. (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 State Guidance on Coronavirus P-EBT: [Click Here](#)

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

State Plan for Pandemic EBT
Children in Child Care, 2022-2023

1. **State:** Pennsylvania

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
- e. Names of state agencies involved in administering this plan.

Response:

- a. This plan is only for child care aged children receiving Supplemental Nutrition Assistance Program (SNAP) benefits. Benefits will be issued to cover the period of September 1, 2022, through May 11, 2023.
- b. P-EBT Benefit Amounts:

Monthly P-EBT (September 2022 through April 2023)	Monthly P-EBT (May 2023)
\$12,462,949.59	\$5,608,327.32
Total P-EBT	\$105,311,924.04

- c. Estimated number of children who will receive P-EBT: 288,561

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 2022 through June 2023, for example).

- d. Tentative Issuance Schedule – Benefits will be issued in two phases using the following tentative schedule:
- a. First Half – this half will cover September 1, 2022, through December 31, 2022. The tentative issuance period for these benefits will be May 11 through May 12, 2023.
 - b. Second Half – this half will cover January 1, 2023, through May 11, 2023. The tentative issuance period for these benefits will be July 26 through July 28, 2023.
- di. The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- Department of Human Services (DHS) – Responsible for developing State Plan; using its Enterprise Data Warehouse to include all children under age 6 as of September 1, 2022 who are eligible members on active SNAP cases; using lists pulled from Data Warehouse to develop a manual issuance file for eligible children; developing an eligibility letter for families with eligible children; contracting with an outside vendor to provide customer assistance for families who may have questions regarding their child’s eligibility for childcare age P-EBT.
- Department of Education – Responsible for providing numbers of children who received lunches through the Child and Adult Care Food Program (CACFP).
- Deloitte – Responsible for running appropriate P-EBT software on the manual issuance file to generate files into the appropriate format to be sent to Pennsylvania’s EBT contractor, Conduent; generating mailing file to be provided to DGS so eligibility letters can be sent.
- Conduent – Responsible for maintaining the EBT system, EPPIC.
- DGS – Responsible for mailing the eligibility letter to families with eligible children.

4. P-EBT for Children in Child Care (see Q&As #26-33)

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.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44². The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children’s eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- 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 #30)
- 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 those children’s eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
 - the child’s child care facility is closed or is operating with reduced attendance or hours, or

² The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

- 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.)

Response: [please use as much space as needed]

Responsible State agencies

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- Department of Human Services (DHS) – Responsible for developing State Plan; using its Enterprise Data Warehouse to include all children under age 6 as of September 1, 2022 who are eligible members on active SNAP cases; using lists pulled from Data Warehouse to develop a manual issuance file for eligible children; developing an eligibility letter for families with eligible children; contracting with an outside vendor to provide customer assistance for families who may have questions regarding their child’s eligibility for childcare age P-EBT.
- Department of Education – Responsible for providing numbers of children who received lunches through the CACFP.
- Deloitte – Responsible for running appropriate P-EBT software on the manual issuance file to generate files into the appropriate format to be sent to Pennsylvania’s EBT contractor, Conduent; generating mailing file to be provided to DGS so eligibility letters can be sent.
- Conduent – Responsible for maintaining the EBT system, EPPIC.
- DGS – Responsible for mailing the eligibility letter to families with eligible children.

Identifying SNAP Enrolled Children

- The State will identify children who began school year 2022-2023 on September 1, 2022, under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT’s authorizing statute, all children under the age of six are deemed enrolled in a covered childcare facility.

- The State will make the reasonable simplifying assumption that children who began receiving benefits as a five-year-old earlier in school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- The State understands that a child’s eligibility for P-EBT child care benefits ends when a child’s SNAP enrollment ends.
- The State will identify and issue a pro-rated May benefit to households who applied for SNAP from May 1, 2023 through May 11, 2023 and who are found eligible for May benefits.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year through *January 2023* relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, the State will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the State on the FNS-44. The State will exclude at-risk lunches and adult lunches. See Tables 1 and 2 below for the State’s lunch claims for the first and second halves.
- The State will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

Setting Benefit Levels Using the CACFP Data Method

- The State will set an average monthly P-EBT child care benefit for each half of the school year. The first half will cover September 2022 through December 2022. The second half will cover January 2023 through May 11, 2023. The averages are calculated using **the following three factors:**

First Half Benefit:

1. The reduction in aggregate lunch claims over the five months in the first half of the school year (September 2022 through January 2023) relative to the same months from September 2019 through January 2020. See Table 1.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: *180 days ÷ 9 months = 20 days per month.*
3. The school year 2022-2023 P-EBT benefit per day of \$8.18.

Second Half Benefit:

1. The second half benefit will be calculated as above, but will use the aggregate reduction in lunch claims over the available months of the second half (January through May 11, 2023) relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of second half P-EBT child care benefits in July 2023, the state will use spring 2023 CACFP claims data for the months of January 2023 through April 2023.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $180 \text{ days} \div 9 \text{ months} = 20 \text{ days per month}$.
3. The school year 2022-2023 P-EBT benefit per day of \$8.18.
4. Pennsylvania will pro-rate the May 2023 benefit to account for 9 weekdays in May prior to the anticipated end of the federal Public Health Emergency. In addition the households eligible at the start of May 2023, Pennsylvania will identify and issue a pro-rated May benefit to households who applied for SNAP from May 1, 2023 through May 11, 2023 and who are found eligible for May benefits.

Table 1: Reduction in CACFP lunch claims – First Half

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, First Half:
September 2019	1,684,842	September 2022	1,325,228	To be applied to daily rate and number of school instructional days per month.
October 2019	1,929,450	October 2022	1,334,118	
November 2019	1,657,225	November 2022	TBD	
December 2019	1,549,091	December 2022	TBD	
Total	TBD	Total	TBD	

Note: CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Since final data for the FNS-44 is not available until approximately 90 days after the end of the month for which meals are being reported, Pennsylvania proposes using actual data for the months covered under its First Half issuances. The final month, December 2022 will have FNS-44 data available as of March 31, 2023, which meets the needs for Pennsylvania’s planned issuances at the end of April 2023. This will ensure that proper amounts can be displayed on notices and incorporated into the issuance process.

Before calculating its First Half P-EBT benefit, Pennsylvania commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the First Half remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Table 2: Reduction in CACFP lunch claims – Second Half

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months	Percent Change, Second Half:
January – April 2023	Total months of CACFP claims data through month of data availability	Total months of CACFP claims data through month of data availability	To be applied to daily rate and number of school instructional days per month. TBD%

Note: CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The figures above are total lunches reported to USDA on FNS-44, Part E, column D, *minus columns A2 and C*, for lines 33, 36, and 39.

Since final data for the FNS-44 is not available until approximately 90 days after the end of the month for which meals are being reported, Pennsylvania proposes using aggregate data of CACFP claims available as of July 1, 2023, to ensure that proper amounts can be displayed on notices and incorporated into the issuance process.

Before calculating its Second Half P-EBT benefit, Pennsylvania commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the Second Half remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

5. Benefit Levels

<p><i>Standard for Benefit Levels</i></p> <ol style="list-style-type: none"> 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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2022-2023 July 1, 2022 - June 30, 2023	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$4.43	\$2.67	\$1.08	\$8.18
Alaska	6.87	4.21	1.75	12.83
Hawaii, Guam, Virgin Islands, Puerto Rico	5.10	3.09	1.26	9.45

Notes:

1. Lunch rates include the 8 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
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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: [please use as much space as needed]

Average monthly P-EBT child care benefits, first and second half:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Daily Benefit Amount	Average Monthly Benefit
First Half (Sept. 2022-Dec. 2022)	TBD%	20	\$8.18	TBD
Second Half (Jan. 2023-April 2023)	TBD%	20	\$8.18	TBD
May 2023	TBD% (same % as Second Half above)	9	\$8.18	TBD

Notes:

1. **Percent Change in CACFP Lunch Claims:** These are the figures in the lower right-hand corners of Tables 1 and 2.
2. **Average Number of Virtual Days per Month:** This is the number of school instructional days in the state's school year divided by the number of benefit months in the state's P-EBT plan. Typically, this is 180 instructional days ÷ 9 benefit months.
3. **Average Monthly Benefit:** This is the outcome of multiplying the figures in the three preceding columns.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 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.
- 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 P-EBT issuances for previous school years. 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.
- 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: [please use as much space as needed]

Implementation Timeline

- Letters of eligibility will be mailed to families with children eligible for the First Half of child care aged P-EBT beginning May 4, 2023.
- First Half benefits for child care aged children will be issued May 11, 2023 through May 12, 2023.
- Letters of eligibility will be mailed to families with children eligible for the Second Half of child care aged P-EBT beginning July 17, 2023. Families that received a letter of eligibility for the First Half benefits will not receive a letter for the Second Half benefits.
- Second Half benefits for child care aged children will be issued July 26, 2023 through July 28, 2023.

Additional Information

- Since being an active SNAP recipient during the appropriate month is required for P-EBT benefit recipients of child care age, all P-EBT benefits to child care aged recipients will be issued to the household's EBT card and no P-EBT cards will be generated for this population.
- Pennsylvania created a separate FS99 code in Conduent's EBT system for P-EBT issuances. Pennsylvania will continue to use this existing code to distinguish P-EBT from any other SNAP or D-SNAP benefits.
- For previous P-EBT issuances, Pennsylvania designated P-EBT first on its draw/spend priority. This process will continue to be used for the 2022-2023 child care aged P-EBT issuances.
- Pennsylvania will permanently expunge benefits after nine months of inactivity to align with the expungement time periods detailed in the Agriculture Improvement Act of 2018, Pub. L. 115-334 (the Farm Bill) keeping the benefits in alignment with SNAP expungement time periods.

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 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.

To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -

- 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: [please use as much space as needed]

- DHS will utilize a live hotline comprised of DHS staff or a contractor. These staff will have access to DHS' electronic Client Information System (eCIS) to check if the child was actively receiving SNAP benefits and did not receive child care aged P-EBT for the corresponding period.
- DHS will also utilize an online submission platform to accept inquiries and resolve any errors in child care aged P-EBT issuances.

Serving Households with Access Problems

- Pennsylvania will continue to comply with civil rights requirements by providing equal access to all individuals, including individuals with disabilities and individuals with limited English proficiency.

- Communication will be sent in English and Spanish and will include a tagline in Pennsylvania’s other priority languages instructing households to contact the Statewide Customer Service Center to obtain translator services. These translator services will also be available to DHS staff responding to parent inquiries.

Public Information Campaign

- Pennsylvania will issue a press release and use social media to disseminate information regarding child care aged P-EBT.
- Pennsylvania will update its P-EBT webpage with information explaining the child care aged P-EBT issuance process and benefit amount.

Information Provided Directly to Participants

- DHS will issue a mailer to all households that will receive a child care aged P-EBT benefit. This mailer will include high-level information about child care aged P-EBT, including that the benefit is non-transferrable and that benefits will be permanently expunged after nine months of inactivity. This mailer will include contact information such as DHS’s P-EBT website and the P-EBT hotline phone number. This mailer will be sent in English and Spanish and will include a tagline in Pennsylvania’s other priority languages instructing households to contact the Statewide Customer Service Center to obtain translator services. This mailer will be sent when benefits are issued.

8. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.

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: [please use as much space as needed]

- Pennsylvania will notify USDA of any issuance errors and will work with the USDA to take any appropriate steps. Pennsylvania will use the spreadsheet template provided by FNS to report any issuance errors. If Pennsylvania determines that any benefits must be reclaimed, it will notify impacted households prior to the benefits being reclaimed. This notification may be through verbal communication via the P-EBT Hotline, through letters mailed by DHS, or through posting information on DHS' P-EBT webpage.

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, 2022 through September 30 2023. 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 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.

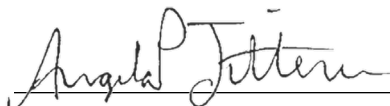
13. Administration of State P-EBT Plan

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:



Hoa Pham
Deputy Secretary, Office of Income Maintenance



Angela Fitterer
Executive Deputy Secretary
Pennsylvania Department of Education

Date of Request: March 31, 2023