

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

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

2. **Primary Citations:** Families First Coronavirus Response Act; Continuing Appropriations Act, 2021 and Other Extensions Act

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 school—August 2020 through May 2021
 - for children in child care - October 2020 through May 2021
- 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. – \$125,582,159
 - Estimated amount issued to school children in non-SNAP households \$157,915,370
 - Estimated amount issued to non-school children in child care - \$17,910,352
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households – 124,955 individuals (need real number, discrepancy gets added to non-SNAP) in 70,350 cases
 - Estimated number of school children in non-SNAP households – 152,776
 - Estimated number of non-school children in child care- 47,227 individuals in 26,477 cases
 - Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.² \$4,348,000.00
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households - _ June 28 through August 30
 - School children in non-SNAP households - June 28 through August 30
 - Children in child care - June 28 through August 30

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.

Arkansas DHS commits to informing USDA of any significant increases or decreases in the numbers above.

Response:

Arkansas proposes to begin distribution of P-EBT benefits retroactively as follows:

Benefit Month	Based on Data Available	Benefit Issuance Date
August / September	September 30, 2020	Beginning July 7, 2021
October / November	November 30, 2020	Beginning July 7, 2021
December / January	January 31, 2021	Beginning July 30, 2021
February / March	March 31, 2021	Beginning August 10, 2021
April / May	May 31, 2021	Beginning August 30, 2021

This model of staggering benefit issuance is based on best practices provided by Food Research and Action Center (FRAC) and No Kid Hungry.

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:
 1. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
 2. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
 3. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 4. 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:

PUBLIC SCHOOLS:

The Arkansas Department of Education (AR DOE), Division of Elementary and Secondary Education (DESE), Child Nutrition Unit (CNU) administers the USDA Child Nutrition Programs for Arkansas public schools.

DESE used three (3) reporting systems during school year 2020-2021. These three (3) reporting systems are independent of one another. These three (3) systems will be used to determine P-EBT eligibility. All data used for P-EBT determinations will be retrospective.

The first, eSchool, has been in use for several years. eSchool is used by school level staff (eSchool Coordinator) to enter student enrollment data at the beginning of each school year. This data includes name, address, date of birth, parents name, meal eligibility status, and instructional choice (in-person, virtual, or hybrid of in-person and virtual). The data can be updated during the school year as parents report changes, etc. to the school district. This will be used to identify students receiving virtual instruction, and therefore, without daily access to school meals. Although the data can be updated at any time, eligibility determinations for P-EBT will be made on the schedule identified on the chart on page 3. If a student is eligible for P-EBT as of this data pull date, then it is an assumption that the student is eligible for the entire two (2) month period.

At the end of each school year, the student data is “rolled over” for the next school year. Graduates’ status changes from “12” for twelfth grade to “GG” for graduate. Students in the twelfth grade that do not graduate must be manually reset to grade 12. Students who transfer

out of district are changed from active to inactive status with the date of withdrawal from the district. Students cannot be simultaneously enrolled in two (2) districts at the same time.

The eSchool system has been used to “match” with SNAP data for several years to provide direct certification matches to schools. eSchool identifies which students were registered as virtual and which students were registered as “on-site.” Some schools ended up transitioning to virtual on specific days. On those days only the on-site students were receiving virtual education, making them in a hybrid model instead of an on-site model for instruction. Use of the eSchool system is mandatory for all public schools and districts.

The second system, InSight, was developed strictly for districts to report days that the district or school(s) within the district would be closing for in-person instruction and transitioning to virtual instruction. This system became operational for the 2020-2021 school year. This system was mandatory for Covid reporting. Districts have regularly implemented modifications and/or implemented moderate or critical responses to mitigate risks of exposure of staff and students to Covid-19.

The third system is the *Ready for Learning Plan*. All public school districts submitted a *Ready for Learning Plan* to DESE for approval prior to the beginning of school year 2020-2021. The purpose of these plans were to allow districts the flexibility to implement a system of hybrid learning, which would allow needed shifts or transitions to offsite virtual learning as necessary to prevent the further spread of Covid-19. The *Ready for Learning Plan* includes details regarding school day and instruction decision options. The Ready for Learning plan gave districts the authority and flexibility to transition to virtual as needed to protect the health and welfare of the students and staff. It is not used in determining benefit level.

As the incidences of Covid increased, many districts implemented a planned district wide one (1) or more day(s) per week virtual instruction day for all students. These planned district wide virtual instruction days were collected in a Google survey completed by the district superintendent or designee. The days reported in InSight were school site-specific days transitioned to virtual as reported by the district. On the planned district wide virtual instruction days, no students will have access to school meals on-site.

Meal Eligibility Status:

In Arkansas, public schools collected and processed applications and other supporting documentation of student’s meal eligibility status during school year 2020-2021. Schools/Districts continued to process meal applications throughout the school year despite USDA allowing all meals to be served without charge to the families under the SSO. Once a student is eligible for free/reduced meals, they are eligible for the entire school year.

Public school districts enter changes to enrollment, demographics or meal eligibility into the eSchool statewide reporting system as need arises. Within the system, eligibility status is coded 01=free, 02=reduced, 03=paid, and 04=free based on direct certification. Enrollment data is uploaded from the district to DESE each evening in the eSchool system, therefore, if a

student becomes eligible during the year, it will be reflected in the statewide reporting system the day after it is entered by the district. eSchool enrollment data (including meal status eligibility) is confirmed against student meal status by the eSchool Coordinator throughout the year and is confirmed to DESE on District Cycle 2 Reporting due annually in October. This process applies to all students. Although the data can be updated at any time, eligibility determinations for P-EBT will be made the date of the data pulls on the schedule identified on the chart on page 3. If a student is eligible for P-EBT as of this data pull date, then it is an assumption that the student is eligible for the entire two (2) month period

New students and transfer students are entered into the eSchool system as part of the school enrollment process every public school and district uses in Arkansas. Meal status is part of the enrollment data collected. Although all students are served meals without charge to the families under the SSO during school year 2020-2021, districts have been encouraged to continue to accept meal applications and process direct certification matches for all students, including new and transferring students. Once a student's meal eligibility status is determined as free or reduced, the student maintains that eligibility for the entire year and thus would be P-EBT eligible the entire year if in a virtual learning environment.

Meal eligibility status can transfer with the student from one school district to another. The meal eligibility status does not automatically transfer with the student transferring from one district to another, but as part of the new and transferring student enrollment process, the receiving district is encouraged to contact the district from which the student exits to received documentation of meal eligibility status. This allows the student to "carry" the meal eligibility benefit and receive the benefit seamlessly on the first day of school at the receiving district.

Enrollment data is uploaded from the district to DESE each evening via eSchool. Therefore, if a student enrolls in a school or becomes eligible for reduced or free meal benefits during the year, it will be reflected in eSchool the day after it is entered by the district. SNAP eligibility changes are updated in the Direct Certification (D/C) portal and are available within 24 hours. In addition to the four (4) statewide direct certification matches each year, districts have the ability to check the D/C portal for individual student matches or groups of student matches at any time.

Students enrolled in a school operating CEP or Provision 2 are served meals without charge to the families. Students are coded as 01=free in the statewide reporting system. All student in the CEP and Provision 2 schools are eligible for the P-EBT benefit for days that their instructional method is virtual, either by student/family choice, transition from in-person to virtual, or planned virtual instruction day during school year 2020-2021.

eSchool data used will be as of September 30, November 30, January 31, March 31 and May 31, 2021. It is an assumption that the student's eligibility and enrollment status has not changed during the two (2) month period prior to the data pull.

Utilizing a timeframe less than every two (2) months for determining P-EBT benefits would create a longer period of time that families will have to wait to receive benefits, and would

increase the amount of data points collected, thus increasing the possibility of error. Arkansas believes that distribution of funds on an every two (2) month data pull will maintain program integrity by decreasing errors related to student meal eligibility status, address and/or instructional option changes throughout the school year.

These responses apply equally to SNAP recipient students and non-SNAP recipient students and private school students. Most private schools contacted did not elect the seven-day waiver at the beginning of the school year so there are very few eligible from this cohort.

RESPONSIBILITIES:

PUBLIC SCHOOLS:

Each public-school district is responsible for:

- accurately approving 2020-2021 student meal eligibility status based on source documents;
- maintaining accurate enrollment and eligibility data for all students in the eSchool statewide reporting system;
- reporting all planned virtual instruction days in the Google survey, and
- reporting all days that in-person instruction was transitioned to virtual instruction in the InSight reporting system.

STATE AGENCY – AR DOE/DESE is responsible for:

- notifying public school districts of the approved plan for P-EBT disbursement;
- pulling data on students’ enrollment, eligibility and instruction choice from eSchool as outlined in the approved plan;
- collecting data on planned virtual instruction days via the Google survey;
- pulling data on unplanned school transitions from in-person to virtual instruction, and
- providing the student P-EBT data file, based on the above to AR DHS/SNAP for benefit processing.

PUBLIC SCHOOL P-EBT SIMPLIFIED ASSUMPTIONS/JUSTIFICATIONS:

It is an assumption that the student’s meal status eligibility and enrollment status has not changed during the two (2) month period prior to the data pull.

It is an assumption that the student’s instruction choice (in-person, versus virtual) did not change during the two (2) month period prior to the data pull.

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.

It is an assumption that if a district reported in InSight that any sub-set of a school (for example grades or classes) transitioned from in-person to virtual instruction then the entire school transitioned, making those free/reduced eligible students enrolled at that school eligible to receive P-EBT benefits for the day(s) the students received virtual instruction.

B. School Status

- 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:

Arkansas has 253 public school districts operating the National School Lunch Program which includes 1026 public schools for the 2020-2021 school year. Arkansas public schools use InSight to report to DESE when in-person instruction transitions to virtual instruction along with the number of days. Districts reported planned virtual instruction days for each month in a Google survey. It is an assumption that districts will follow the planned virtual instruction days reported in the Google survey for May. As noted above, all data used for P-EBT eligibility determinations will be based on retrospective data.

All districts were instructed by ADE/DESE Administration to report Covid infections and exposures in InSight as well as the action plan, which may or may not include transitioning to virtual education for a specified length of time at a specific site. Only those days that were reported as transitioned to virtual were included in the calculations for each specific site. The Google Survey collected only planned transitions from on-Site to virtual. While districts were instructed to use both the InSight and Google Survey to report data, it is the district's responsibility to ensure that the data was reported.

August 13, 2020 was the planned start date for the 2020-2021 school year. Governor Asa Hutchinson issued an Executive Order to delay the start of school until August 24, 2020. Therefore, the state of Arkansas believes that all public schools have met the five (5) consecutive day closure requirement.

All public-school districts in Arkansas applied for and received a waiver from the required 6-hour instructional day in order to offer a virtual instruction option for students. Further, under the Executive Orders 20-06 and 20-48 issued by Governor Asa Hutchinson on March 17, 2020, and October 13, 2020, respectively, the following statute has been suspended for the duration of the Covid-19 emergency: A.C.A. 6-10-126(b)(1).

This suspended provision allows districts to have more than five (5) school days with an early release or delayed start. Districts are using this flexibility to implement shorter instructional days for in-person students and dedicated time for teachers to instruct virtual students. Many public-school districts are also electing to dedicate one (1) full day each week to virtual instruction.

All public-school districts submitted a *Ready for Learning Plan* to DESE for approval. The purpose of these plans were to allow districts the flexibility to implement a system of blended learning, which would allow needed transitions to offsite virtual learning as necessary to prevent the further spread of Covid-19. The *Ready for Learning Plan* includes details regarding school day and instructional decision options.

Districts have regularly implemented modifications and/or implemented moderate or critical responses to mitigate risks of exposure of staff and students to Covid-19.

Arkansas public school districts' enrollment data is uploaded to DESE each evening for every enrolled student via the eSchool reporting system. This data includes instructional choice (in-person or virtual). Schools/Districts make changes to update the eSchool system including the instructional option as often as necessary to reflect the current information.

eSchool data used will be as of September 30, November 30, January 31, March 31, and May 31, 2021. It is an assumption that the students' meal eligibility and enrollment status has not changed during the two (2) month period prior to the data pull. This will be retrospective data.

InSight data reporting when schools transition from in-person to virtual instruction will be pulled after the end of the month for which benefits are being calculated. This will be retrospective data.

Planned virtual instruction days reported via the Google survey will be used as reported for August – May. It is an assumption that during May districts will use these virtual instruction days as planned. This will be retrospective data.

All benefit issuance made by Arkansas will be retrospective. All P-EBT benefits issued will be made to free or reduced eligible students only on days of virtual instruction. Benefits will begin with the next data pull date after the student becomes eligible for free/reduced meals if the student receives virtual instruction. Benefits will not be retroactive to the beginning of the school year.

All public-school districts with an approved Child Nutrition Agreement for school year 2020-2021 are expected to continue providing meals for both virtual and in-person students under the SSO. Schools/Districts are encouraged to continue to process meal applications and other meal status supporting documentation, including direct certification matches, during the entire school year. Meal eligibility status is one of the data elements updated in eSchool as new meals benefit determinations are made.

Arkansas public school districts report to DESE via InSight when in-person instruction transitions to virtual instruction along with the number of days.

Data used to calculate benefit payments will be September 30, November 30, January 31, March 31 and May 31, 2021. See page 2 for proposed benefit period, data collection and benefit issuance proposed dates. P-EBT benefit determinations will be made as of the dates above and will apply to the preceding two (2) month period using the assumption that the student's meal status eligibility and enrollment status has not changed during the two (2) month period prior to the date of the data pull.

It is an assumption that the student's instruction choice (in-person, versus virtual) did not change during the two (2) month period prior to the data pull.

Arkansas will:

- use data reported by school districts to identify children who had elected a fully virtually learning model:

- data will be pulled from this dataset every two months to determine whether a child’s elected learning model has changed; a child’s learning model as of the date data is pulled will be considered their learning model for the preceding two months
- set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.
- use data reported by school districts in a State system developed for COVID reporting purposes to identify schools with *planned* virtual instruction days and issue a single benefit amount to all eligible children in the school based on the number of virtual instruction days reported
- use data reported by school districts to identify *unplanned* school closures due to COVID
 - in cases where Arkansas can establish that the majority of grades transitioned from in-person to virtual learning due to COVID, all eligible children in the school will receive benefits for the unplanned closure,
 - in cases where Arkansas cannot establish that majority of grades transitioned from in-person to virtual learning due to COVID, eligible children may be issued benefits on a case-by-case through Arkansas’ customer service process:
 - Arkansas will only issue benefits to these children if their eligibility based on having to transition from in-person to virtual learning can be verified by their school district.
- issue benefits for the months of August and September in a single distribution beginning July 7
- issue benefits for the months of October and November in a single distribution beginning July 7
- issue benefits for the months of December and January in a single distribution beginning July 30
- issue benefits for the months of February and March in a single distribution beginning August 10
- issue benefits for the months of April and May in a single distribution beginning August 30

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.

5. P-EBT for Children in Child Care

- 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:

All public school districts in Arkansas applied for and received a waiver from the required 6-hour instructional day in order to offer a virtual instruction option for students. Further, under the Executive Orders 20-06 and 20-48 issued by Governor Asa Hutchinson on March 17, 2020, and October 13, 2020, respectively, the following statute has been suspended for the duration of the Covid-19 emergency: A.C.A. 6-10-126(b)(1).

This suspended provision allows districts to have more than five (5) school days with an early release or delayed start. Districts are using this flexibility to implement shorter instructional days for in-person students and dedicated time for teachers to instruct virtual students. Many public school districts are also electing to dedicate one (1) full day each week to virtual instruction.

All public school districts submitted a *Ready for Learning Plan* to DESE for approval. The purpose of these plans were to allow districts the flexibility to implement a system of blended learning, which would allow needed transitions to

offsite virtual learning as necessary to prevent the further spread of Covid-19. The *Ready for Learning Plan* includes details regarding school day and instructional decision options.

Because all school districts operated at reduced capacity at the beginning of the current school year, all children under 6 and not included on an authorization file from AR DOE, are deemed eligible as noted in the criteria above.

Arkansas DHS will use the same school learning model data collected by DESE for P-EBT Children in School.

A child is deemed six years of age if the child reaches the age of six before September 1 of the current school year.

DHS will identify all SNAP children under 6 years old receiving SNAP benefits starting October 1, 2020, and deem them categorically eligible using our benefit eligibility system.

DHS will identify these children by their county of residence. Only residents who reside within the State of Arkansas are eligible for SNAP and will be eligible for the childcare benefit.

The scope of "in the area" is to mean the counties within Arkansas and as such will be a single designated school every month starting October 2020 - May 2021 for child-care purposes in each county.

DHS will use the SNAP eligibility system to determine the benefits received using existing processes in place that conform with SNAP privacy requirements.

DHS will cross-reference this population with any children submitted by DESE to ensure a given child does not receive duplicate benefits. Child-care benefits will supersede school benefits in the event of an overlap for October 2020 till the end of the program.

DHS is considering issuing a letter to households letting them know benefits will be arriving. Arkansas DHS will issue P-EBT childcare benefits back to October 2020 in the state's first P-EBT issuance only. For any subsequent issuances, the State will issue benefits back to the last benefit month in the previous issuance.

Newly eligible children will be monitored monthly until the end of May 2021.

Arkansas' simplifying assumption is that since DESE has determined benefit amounts for every school district in every county, DHS will issue the highest benefit per county as indicated by the data received from DESE regarding school level payment calculations. For every county that has a zero-benefit amount, DHS will take the average of the bordering counties (excluding counties with a zero benefit) to determine the benefit amount. This will alleviate appeals and questions about benefit levels. The simplifying assumption is fair, consistent, and gives adequate assistance to parents of preschool children.

Arkansas is making this simplification after considering:

- the constraints of our legacy eligibility system,
- that Arkansas schools allow parents to enroll their children in schools other than their designated school using variance waivers,
- and the number of charter and private schools that overlap boundaries with our public schools.
- Arkansas would not be able to accurately and expediently determine which school is the correct school for either the child's residence in our eligibility system.

6. Benefit Levels

Standard for Benefit Levels

3. 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 reduced burden to school districts, streamline the processes and more easily communicate to recipients and stakeholders, Arkansas intends to utilize the following simplifying assumptions to provide a uniform benefit to all eligible students.

- Since Arkansas’ school year is 178 instructional days, the P-EBT benefit level for all P-EBT eligible students enrolled in virtual instruction option, will be calculated using the following formula:

$$178 \text{ days} \times \$6.82 \text{ per day} = \$1213.96 / 10 \text{ months} = \$121 \text{ monthly benefit August - May}$$

this includes students whose school district is operating an in-person or hybrid model, but the family opts into fully virtual instructional option.
- The P-EBT benefit for each school will be calculated with one (1) benefit amount to each P-EBT eligible student enrolled receiving in-person instruction whose school either –
 - Implements a planned virtual instruction day one (1) or more day(s) per week as reported in the Google survey, or
 - Transitions from in-person to virtual instruction to mitigate risk of exposure to Covid or because of increasing Covid infection rates.

Data reported by each school district in eSchool, InSight and in a Google survey will be used to determine benefit levels. A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student’s lack of access to school meals. A student’s instructional option will determine their access to school meals and determine the P-EBT benefit level. Private school participants will receive benefits based on the same formula.

If a school operated an in-person instructional option with no planned virtual instruction days and no unplanned transition to virtual instruction during the benefit period, then the students enrolled at that school will be ineligible for P-EBT for that period. However, those students may become eligible at any time if either:

- The student withdraws from in-person instruction and enrolls in a virtual instructional option, or
- The school implements either planned virtual instruction days or unplanned transition to only virtual instruction.

Arkansas seeks to apply the following simplifying assumptions:

It is an assumption that the student's eligibility and enrollment status has not changed during the two (2) month period prior to the data pull.

It is an assumption that the student's instruction choice (in-person versus virtual) did not change during the two (2) month period prior to the data pull.

Arkansas will:

- use data reported by school districts to identify children who had elected a fully virtually learning model:
 - data will be pulled from this dataset every two months to determine whether a child's elected learning model has changed; a child's learning model as of the date data is pulled will be considered their learning model for the preceding two months
 - set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.
- use data reported by school districts in a State system developed for COVID reporting purposes to identify schools with *planned* virtual instruction days and issue a single benefit amount to all eligible children in the school based on the number of virtual instruction days reported
- use data reported by school districts to identify *unplanned* school closures due to COVID
 - in cases where Arkansas can establish that the majority of grades transitioned from in-person to virtual learning due to COVID, all eligible children in the school will receive benefits for the unplanned closure,
 - in cases where Arkansas cannot establish that majority of grades transitioned from in-person to virtual learning due to COVID, eligible children may be issued benefits on a case-by-case through Arkansas' customer service process:
 - Arkansas will only issue benefits to these children if their eligibility based on having to transition from in-person to virtual learning can be verified by their school district.
- issue benefits for the months of August and September in a single distribution beginning July 7

- issue benefits for the months of October and November in a single distribution beginning July 7
- issue benefits for the months of December and January in a single distribution beginning July 30
- issue benefits for the months of February and March in a single distribution beginning August 10
- issue benefits for the months of April and May in a single distribution beginning August 30

The chart on page 2 outlines the benefit period, data collection date and proposed benefit issuance date.

Benefit calculation for students enrolled in Arkansas public schools will be dependent on:

- the school’s operation of the National School Lunch/School Breakfast Program,
- the student’s meal eligibility status is free or reduced (or the student is enrolled in a school operating under CEP or Provision 2),
- the student’s selected instruction option,
- the number of days the school planned virtual instruction for all students, and
- the number of days the school transitioned from in-person to virtual instruction as determined by using data submitted by school district’s statewide reporting in eSchool, InSight, and Google survey.

For example:

- A free/reduced eligible student enrolled in the virtual instructional option would receive the P-EBT benefit for each instructional day of the month.
- A free/reduced eligible student enrolled in the in-person instructional option but the school planned every Friday as a “virtual instruction day”, would receive the P-EBT benefit for every virtual instruction day, but not any of the in-person instructional days. If the month had five (5) Fridays, then the student would receive the benefit for five (5) days.
- A free/reduced eligible student enrolled in the in-person instructional option but the school transitions for a two (2) week period, including ten (10) instructional days from in-person to virtual only. This student would be eligible for ten (10) days P-EBT benefit.

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? All Non SNAP households will receive a plain white card with PEBT embossed on the card for each child.
- 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. PEBT sub benefit type will be used.
- 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. PEBT is first 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. SNAP expungement rules
- 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? Cards that are designated as returned will not be reissued until contact is made with the household to ensure integrity and card receipt.
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Non-SNAP individuals get new cards and SNAP households have benefits added to current card.
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Milestone	Day	Narrative
Address Update Messaging to School Districts	-30 through +90 ongoing	<ul style="list-style-type: none"> • A 3-week deadline is given for first update completion

DHS posts social media information on PEBT	-30 through +90 ongoing	
Draft Plan to FNS	May 13, 2021	Expediting feedback loop
Signed plan to FNS	After response to feedback complete	Before May ends
USDA approves plan	0	
Public notice campaign-strategic Tuesday	Best Tuesday after plan approval but before issuance begin date.	Governor, with DESE and DHS officials
DHS submits contract amendment with processor	-30 to -15	Legislative review June 18
Contact Center Opens	Prospectively July 1	
First Issuance	File sent to EBT 6/28	7-10 day turnaround
Second Issuance and clean up issuances	File sent to EBT 7/10	7-10 day turnaround
Third Issuance and clean up issuances and clean up issuances	File sent to EBT 7/30	7-10 day turnaround
Fourth Issuance and clean up issuances	File sent to EBT 8/10	7-10 day turnaround
Fifth Issuance and clean up issuances	File sent to EBT 8/30	7-10 day turnaround
Clean up issuances continue	Files sent from 9/1 through 9/30	7-10 day turnaround
Contact Center closes	November 30th	May be extended month to month if needed.

Data Pull and Benefit Issuance Proposed Date:

Benefit Month	Based on Data Available	Benefit Issuance Date
August / September	September 30, 2020	Beginning July 7, 2021
October / November	November 30, 2020	Beginning July 7, 2021
December / January	January 31, 2021	Beginning July 30, 2021
February / March	March 31, 2021	Beginning August 10, 2021
April / May	May 31, 2021	Beginning August 30, 2021

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.

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

8. Customer Service

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
 - Please describe how the State will serve groups with potential access problems, for example:
 - homeless children-ADE collects and applies a homeless indicator in eschool. The homeless barrier is addressed with local workarounds through the district.
 - foster children- DHS will run a match of those in foster care from the DHS Foster Care management information system.
 - children without social security numbers-pseudo ssn's will be supplied when required
 - children with limited English proficiency, households without internet access, and people living with disabilities. Each of these barriers are addressed through business practices and system functionality through both agencies.
- 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 PIN-ing 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?

We plan to distribute information about P-EBT to the general public through a variety of platforms – on and offline as well as earned media, including:

- Details on the program and eligibility as well as frequently asked questions (FAQ) and answers will be added to dedicated pages on the websites of both the Department of Human Services (DHS) and the Department of Education (ADE).
- Information shared on digital bulletin boards in all our DHS county offices as well as all State revenue offices (where people get their driver’s license)
- Specialized graphics will be deployed on Facebook, Instagram and Twitter, including one that is already running focused on encouraging clients to make sure their addresses on file are correct. We also are asking schools and districts to share these graphics on their social media channels. Future graphics for use on social media channels will focus on when the new cards will be distributed and who is eligible, and the posts will direct users to the P-EBT pages on the DHS and ADE websites for more information. We will also monitor social media comments and submitted questions, both in order to respond with accurate details and to determine if broader communications (such as a new question or the FAQ) are needed for specific topics.
- Press conference and subsequent press release detailing eligibility and timelines
- We will pursue opportunities for interviews and media appearances (broadcast, print & online) aimed at increasing awareness of the program.
- We will also create fliers that can be provided to clients or posted at DHS county offices and to ADE.
- Will provide graphics and information to all state Legislators and ask that they share information with their constituents.

- We will include a buck slip with the P-EBT cards that will provide an overview of the program and include instructions on how to activate and use the card. It will also detail the restrictions on how it can and cannot be used and include information about how violations, such as selling the card, are against the law. It will also note that the card can be cut in half by those who do not wish to receive the benefits, and it will include the call center number for additional questions.
- We also will reach out directly to P-EBT participants through an informational memo and flier that school districts will provide to parents of eligible children. These fliers will include much of the information from the buck slip along with prominent displays of the websites and call center as routes to obtain additional information.
- The DESE Communications Team will distribute the email to local district Communication Directors.
- The DESE Family Engagement Team will distribute the email to local district Engagement Coordinators/Facilitators. They also have staff that will translate the email into Spanish and distribute the Spanish version to districts.
- CNU will distribute the email to local Child Nutrition Directors and Superintendents.
- This process will be followed to get information to the districts, for distribution to families in their respective communities.

Because of previous PEBT releases, we have a large following of eligible families on our social media accounts and know that they will get those messages directly as well. For national inquiries regarding the PEBT matters, please contact Gavin Lesnick

To ensure adequate customer service and triage of issues arising from the issuing of benefits to almost 300,000 individuals, DHS plans to use a contact center deployed by our current EBT contractor, Conduent. They have experience in quickly standing up contact centers similar to the one the state needs for P-EBT to ensure that calls are answered and properly handled or redirected and that emails are answered. The addition of the call center will ease the administrative burden on DHS and AR DOE and will prevent some of the frustrations felt by previous PEBT clients in the first iteration.

The specifications from Conduent are included below.

STATEMENT OF WORK

PROGRAM DESCRIPTION

The Arkansas DHS Food Assistance Program is seeking a contract with a vendor to provide Customer Call Center services for the State 's (Pandemic EBT) P-EBT program during an initial fivemonth period from June 1, 2021 to November 30, 2021, with the option to extend by mutual agreement a month at a time. P-EBT is a program which provides SNAP benefits to children who miss meals which would be provided to the students under the National School Lunch Program (NSLP) were the students attending school, and to children who would receive meals if they could attend day care.

TYPE OF SERVICES

The Vendor is required to support a Customer Service Help Desk which will work with The Arkansas Department of Human Services (DHS). The Vendor will receive and answer P-EBT calls that would normally be answered and handled by DHS. The Vendor must offer the following customer services:

- The Customer Service Center will offer clients the ability to reach Customer Service Representatives (CSRs) Monday-Friday; 9:00 am - 9:00 pm CST.
- Clients should be able to reach the Customer Service Center via a toll-free "1-800" number.
- CSRs must monitor questions to help compile a Frequently Asked Questions (FAQs) list.
- The Vendor must provide a Customer Service contact center which meets or exceeds the service requirements listed in the Pricing section:
- The Vendor must provide CSRs to resolve client issues. The Vendor must provide sufficient CSR capacity to meet the contractual service standards for client calls. The Vendor must provide customer service to reach live representatives with a waiting period daily average of not more than ten (10) minutes.
- The Customer Service Center will handle client questions related to Pandemic-Electronic Benefits Transfer (P-EBT) eligibility, benefit issuance, address changes, and other questions related to Arkansas' P-EBT program.
- The caller's identity must be confirmed using questions agreed to and approved by the State prior to giving caller any household demographic information or requesting card cancellation/address update/card re-issue.
- Clients requesting benefit availability date must be given the date benefits will be issued based on the issuance schedule supplied by the State.
- Clients requesting address changes must have the new address taken and submitted in a mutually agreed to format by Vendor to

DHS to have the address updated.

- The Vendor must supply a mutually agreed to electronic mechanism to track, monitor and resolve all address changes and allotment disputes so that it can be communicated clearly to DHS what issues need to be resolved to ensure proper and timely distribution of P-EBT benefit.
- The Vendor must be able to assist clients in handling allotment dispute issues including determining if the caller's school and/or school district participated in P-EBT using data provided by the State. If the caller appears to have been eligible for P-EBT then their information will be documented and passed to the State. Callers where the school did not participate will be referred to their local school district.

Reporting Requirements

Monthly reports must be generated which will provide DHS with the following information. This list is not intended to be a comprehensive list:

- Number of Daily Calls Received
- Number of Calls Resolved by the Call Center
- Number of Calls Referred To DHS
- Addresses to Be Updated By DHS
- Number of Benefit Disputes Logged

Call Center Assumptions and Service Requirements

1. Average Speed to Answer:	10 Minutes
2. Average Handle Time (Calls}	10 Minutes
3. Email Turn Around Time:	1 Business Day
4. Full Time Equivalent Hours Per Week:	40 Hours
5. Inbound Call Volume:	8,000 Calls Per Month
6. Email Volume:	2,800 Emails Per Month

Transaction Type	Summary	Estimated Quantity
Inbound Calls	FTE's	19
Emails	FTE's	7
Non Production Staff	FTE's	4
TOTAL	FTE's	30

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:

DHS is exploring how best to utilize the existing overpayment claim establishment and collections process to account for P-EBT overpayments. Necessary procedural changes are in process to account for this new population of overpayment and identification of the type of SNAP overpayment, as well as the responsible party(ies) for the overpayments.

For instances where overpayments occur due to system error or other assignment errors the benefit may be recouped by DHS for that case if readily available. If the benefit has been spent, the case may be referred to the DHS Office of Accounts Receivable and Collections.

P-EBT benefits will not be reclaimed by reducing the household's SNAP benefits.

DESE validates all data and provides only students that are qualified for P-EBT based on household application for free or reduced-price meals and identified student categories per USDA guidance and regulation. The data provided to DHS will be unduplicated students that have been determined eligible for the P-EBT benefit by the DESE. DHS ensures that the qualifying benefit will not be duplicated via data analysis of SNAP caseload and data sent from DESE. We also will link the student ID to the benefit record, the case and student file so we are able to determine payment integrity. In determining the benefit amount for each child, DESE will use the methodology as outlined in the benefit section. DHS will have analysis performed on the DESE student data file before and during issuance to prevent duplicate payments; this is accomplished by utilizing the students ID number, and first and last name. A test issuance run will be performed and quality checks reviewed before issuance is authorized for a production run. After issuance, verification checks will be performed using the Student ID and available case information to check for overpayments or duplicate payments.

DHS and DESE by using retrospective issuance, expects to avoid over issuance in most cases.

Underpayments: Starting in July 2021, DHS will start accepting underpayment claims from parents and guardians to research and resolve for children not paid or partially paid for a given month during the program through a simple request (appeal) process made to the contact center and other request modalities. Claims will be either for full payment or partial payment for a given month. Monthly benefits levels are set at the district level by DESE. DHS will verify through DESE with the local school to confirm or deny the claim. Children must be on the DESE student-file for this process or will be referred to the local school to turn in a NSLP free and reduced lunch application. If the school learning plan for the month(s) and subsequent access flag in question supports the claim, DHS will issue the difference in lump sum or subsequent issuance cycles until the program ends.

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, 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
Mary Franklin, Division Director
Arkansas Department of Human Service



Signature
Suzanne Davidson, CNU Director
Arkansas Department of Education

Date of Request: 06/11/2021