

**State Plan for Pandemic EBT: Children in School  
School Year 2020-2021**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	State Plan for Pandemic EBT: Children in School, School Year 2020-2021
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	November 16, 2020
<b>Replaces:</b>	N/A
<b>Summary:</b>	(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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<b>Disclaimer:</b>	<b>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.</b>

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

**State Plan for Pandemic EBT: Children in School**  
**School Year 2020-2021**

1. **State:** Louisiana
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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment.
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
  - School children in SNAP households
  - School children in non-SNAP households

**LA Response:**

- a. Louisiana proposes to build off its previously approved P-EBT plan for March, April and May 2020. The date range for the current plan will be from August 1, 2020 through May 31, 2021. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this plan.
- b. Louisiana proposes to issue approximately \$15 million dollars monthly. This approximate amount was calculated by using March 2021 data provided by Louisiana Department of Education (LDE) as a baseline. Total approximate number of students eligible for P-EBT in March 2021 is 290,156 students. Of those, 17,321 are 100% virtual and would receive \$120.71 per month ( $17,321 * \$120.71 = \$2,090,817.91$ ) and 272,835 are hybrid learners and would receive \$48.23 per month ( $272,835 * \$48.23 = 13,158,832.05$ ) for a total of \$15,249,649.96 for the month of March. The state will issue approximately \$153 million (monthly estimate multiplied by the ten months, August 2020 through May 2021) within this plan. The State will report on the number of P-EBT eligible student that receive SNAP at a later date, we are unable to identify this information at this time.

- c. Total approximate number of students eligible for P-EBT in March 2021 is 290,156
  - a. The number of SNAP children and non-SNAP children will be reported later, we are unable to identify this at this time.
- d. The estimated total amount of administrative funds the State needs to complete the work described in this plan is \$5,400,000. This amount includes the administration of the program, system updates and portal build, customer service call center, communications and public outreach.
- e. The state intends to issue P-EBT benefits retroactively by the 20th of the month for all eligible recipients. The following is the tentative issuance schedule:

May 2021 - August 2020 through October 2020

June 2021 – November 2021 – January 2021

July 2021 – February 2021 – May 2021

For ongoing issuances, Louisiana intends to issue P-EBT benefits for multiple months on a retroactive basis. Because each child will be issued their own PEBT card, it will take days, if not several weeks to issue all of the cards. All eligible school districts will provide the state with a list of students eligible for free and reduced-price meals and their respective learning modes by the designated due dates. This allows for the necessary data clean up and file transfer to the state's EBT processor, INMAR. Louisiana issues SNAP benefits from the 1st through the 20th of each month. Louisiana issues SNAP benefits based off the last two digits of the social security number. Issuing PEBT benefits on the 20th of the month allows for us to conclude our monthly issuance cycle. Louisiana has reached out to INMAR and this P-EBT will be operated using the same contract language as the prior P-EBT. The draft P-EBT plan has been shared with INMAR.

#### **4. P-EBT for School Children**

##### **A. Eligible Children**

*Standard for P-EBT Eligibility*

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
  - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- a. Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- b. 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.
- c. 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.
- d. 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.).
- e. 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).

**LA Response:**

- a. To identify and confirm eligibility for students, DCFS will use data provided by the school districts. DCFS will instruct school districts to upload a list of currently enrolled students who are eligible for Pandemic EBT via a portal. The department will provide school districts with program eligibility criteria.
- b. The individual school systems will upload only students certified as eligible for Free/Reduced priced meals. Each month will be uploaded separately allowing newly certified students to be eligible beginning their first month of eligibility. SNAP and non-SNAP students and public and private students will be certified for PEBT using the same criteria

- c. Public and private school districts are tracking a school's learning mode (i.e. virtual, hybrid or fully in-person). A school's learning mode classification will confirm their access to meals at school and P-EBT benefit level. School systems will also be responsible for identifying which students are enrolled in virtual classes 100% of the time or hybrid and sharing this information with DCFS. The school districts will upload individual student data for all virtual and hybrid learners for each individual month in the school year.
- d. The state intends to leverage simplifying assumptions to issue two benefit amounts, one amount for hybrid students and one amount for fully virtual students (more details are provided in the Benefit Level section). The state plans to issue P-EBT retroactively as indicated in the above response. DCFS will request that school districts provide any updates to a school's learning mode via the portal as outlined in Implementation Timeline, EBT Processing, and Benefit Issuance section.
- e. The following entities are involved in the administration of P-EBT:
  - 1. The Department of Children and Family Services (DCFS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to customers and provision of customer service and support.
  - 2. The LDE trains local school districts how to make free and reduced eligibility determinations and provides continuous support throughout the school year. Local school districts determine school meal eligibility and track student learning mode classifications. LDE and DCFS will work collaboratively to resolve any issues or concerns regarding PEBT.

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- a. Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- b. 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?
- c. 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.).
- d. 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.
- e. 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.

### **LA Response:**

- a. Louisiana schools will track the learning mode for each student (fully virtual, fully in-person or hybrid). Louisiana will identify, confirm and monitor the status of individual student for PEBT eligibility through monthly reporting from school districts.
- b. Each school district is providing school level data with school closures by month to DCFS. This data determines if any students are eligible for P-EBT by month.
- c. Each school district will upload student level data for each month of the school year, which includes the days the child was virtual or hybrid for each month, starting with August 2020. The monthly benefit will be issued based on the student's status for that month. If a student is virtual one month and hybrid the following month, they will get the appropriate benefit for each month.
- d. LDE will provide monthly reports of the information school systems report. All data received by LDE is self-reported by the school systems.

- e. Since the department is issuing for prior months, there is no need for assumptions, the correct benefit will be issued by month based on the student’s learning mode for that month. DCFS and LDE will provide guidance to each district on how to classify and report a student’s learning mode. All students in a fully virtual or hybrid learning mode who are eligible for free or reduced-price benefits under normal NSLP rules will be eligible for P-EBT.
- f.

**5. Benefit Levels**

*Standard for Benefit Levels*

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast and a lunch 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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

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.

**LA Response:**

Louisiana intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct amounts, one amount for students enrolled in a fully virtual learning mode (inclusive of students whose school district is operating an in-person or hybrid model but the family opts into fully virtual learning) and one amount for students enrolled in a hybrid learning mode (inclusive of students who are absent from an in-person learning model due to COVID and the need to quarantine).

The fully virtual benefit amount will be calculated using a monthly average based on the school calendar. This method factors in school holidays and allows Louisiana to spread the total maximum benefit for the school year across multiple months. In Louisiana, there are 177 days required per school year (10 months) with an average of 17.7 days/month. Louisiana believes using 17.7 days to inform the fully remote amount is reasonable. This allows the state to issue one consistent benefit of \$120.71 per month ( $\$6.82 \times 17.7$  days), thus mitigating household confusion.

On a statewide average, students learned virtually approximately 2 days per week when schools operated a hybrid-learning model. Using a standard conversion factor (17.7 days of benefits/5 days per week) of  $3.54 \times 2$  extrapolates to 7.08 days. The average was determined using data collected by LDE from 1400 public schools in Louisiana. Out of 1400 schools, 97% of schools provided onsite days attended by hybrid students. The 3% not reporting were not included in the hybrid calculation. Calculating the hybrid amount to equal 7.08 days allows school districts operating in a fully in-person model to categorize any student's absent due to COVID as "hybrid" for that month. The hybrid benefit amount will equal  $\$6.82 \times 7.08$  hybrid virtual days for the month= $\$48.23$ ). Louisiana agrees to collect data to reassess this average every two months. This will confirm whether the current hybrid calculation remains the same or will change.

To account for the fluid nature of the pandemic and that a student's status may change mid-month, the state will be issuing benefits retroactively for the previous month using the learning mode that the student is enrolled in for most of that month. Furthermore, for students who become eligible for P-EBT mid-month, the learning mode they were enrolled in for most of that month will inform their benefit amount.

## **6. 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:

- a. 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?
- b. 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.
- c. 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.
- d. 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.
- e. 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?
- f. Will you issue *new* P-EBT cards to existing P-EBT households?
  - 1.If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
  - 2.If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

**LA Response:**

It is Louisiana's goal to begin issuing P-EBT benefits in May 2021. The feasibility of this will depend on the date of plan approval. The state may need to change the issuance schedule depending on when the plan is approved and how the timeline intersects with the holidays. The tentative approach is as follows:

- Day 0: Plan approval is received.
- Day 1: Inform school districts of the reporting criteria and the process for uploading their data to the portal Including instructions for submission.
- Day 10 deadline for school districts to submit files. By day 10, schools will upload student data for August 2020 through October 2020.
  - By day 40, schools will upload student data for November 2020 through May 2021.
- Day 11: Public awareness campaign commences.
- Day 12: File transfers to EBT processor INMAR, notice production begins
- Day 13: P-EBT cards will be mailed to the home address provided to DCFS from the local schools. Benefits will be posted and available on cards being mailed and clients are notified via social media, website, via community advocates.

Note: three to five days may need to be added to these dates based on weekend and holiday schedules.

- a. P-EBT Students will receive their benefits on a new P-EBT card for this round. This means that a separate P-EBT card will be issued for each child in a household. The cards will have the same look as SNAP EBT cards (Louisiana Purchase) but all PEBT card numbers will have ‘99’ as the first two digits making them slightly different than ‘regular’ EBT cards. Each month, P-EBT benefits will go on the same card. These P-EBT cards will be accompanied with a flyer that explains that the P-EBT card has the name of the student.
- b. The state will continue its use of the P-EBT benefit code which was modified specifically for P-EBT. P-EBT benefits will be identified on the system separate and apart from all other benefit types, including regular SNAP, DSNAP, supplements (emergency allotments), and replacement benefits.
- c. Since the P-EBT cards will only have P-EBT benefits and no card will have both P-EBT and SNAP, there is no draw/spend priority.
- d. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. For families whose cards have been lost or damaged, a replacement card request process via the P-EBT customer service assistance line will be available.
- e. Undeliverable cards will be returned to INMAR. INMAR will provide the state with a report listing P-EBT cards that were returned, deactivated, and destroyed.
- f. P-EBT Students will receive their benefits on a new P-EBT card for this round. This means that a separate P-EBT card will be issued for each child in a household. The cards will have the same look as SNAP EBT cards (Louisiana Purchase) but all PEBT card numbers will have ‘99’ as the first two digits making them slightly different than ‘regular’ EBT cards. Each month, P-EBT benefits will go on the same card. These P-EBT cards will be accompanied with a flyer that explains that the P-EBT card has the name of the student.

## 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.

- a. 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.
- b. Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people

living with disabilities.

- c. 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 the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
    - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
      - A description of P-EBT
      - Instructions for PINing a P-EBT card
      - Explanation of where benefits can be used
      - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
      - Explanation of violations and penalties, such as trafficking
      - An indication that benefits are non-transferable
      - Instructions for destroying the card, if they want to decline benefits
      - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
    - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
    - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
    - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

**LA Response:**

- a. DCFS will utilize a customer portal and our Customer Service Call Center (CSCC) to field calls related to P-EBT. The CSCC is managed by a manager, DCFS staff and contracted staff. These staff are empowered to research and address such cases. State staff can update addresses, issue EBT cards, and check eligibility. DCFS Policy, Systems staff, Call Center staff, and LDE staff work in collaboration to resolve disputes and/or issuance errors. When necessary DCFS works with the appropriate school food director to validate information that is disputed by the client. Once validated, DCFS works with the Contractor, Deloitte to correct and/or issue corrected benefits; this is on a case-by-case basis.
- b. Since there will be a Direct Certification process instead of an application process, we do

not believe there will be any access issues. DCFS will identify all PEBT eligible children. Parents/guardians are not required to complete any type of application or required to do anything further to receive P-EBT benefit. If identified as receiving and or eligible for free or reduced-price meals, the child will receive the P-EBT benefit. The data utilized for each issuance is the most current data received from schools to ensure that the P-EBT cards and benefits are issued to the correct addresses and all eligible children receive the benefit. LA DCFS has access to a point of contact with the School Districts and works closely with different advocates to address all the stated barriers. It is the intention of DCFS to use the child's state issued school ID in lieu of Social Security Numbers.

- c. **Informing and engaging P-EBT participants and other primary and secondary audiences in P-EBT will be essential to the program's success. Louisiana DCFS proposes the following:**

#### **Interactive Online Portal**

The hub of DCFS' communication effort will be its online P-EBT portal. The online portal will provide P-EBT information and assistance in an easy-to-navigate format. DCFS will collaborate with community partners in an effort to ensure the portal responds to the needs of the families it serves. The portal will feature the following:

- Basic information about the purpose of the P-EBT program presented with family-friendly graphics and links.
- Links to customer service and assistance for common issues with P-EBT cases, EBT card activations, card balances, etc.
- Frequently-asked questions and tips in a user-friendly format
- Accessibility features, to allow users to view the portal in multiple languages and for ease of access

#### **Mass Text and Phone Messages**

DCFS will drive clients to the portal through regular mass text alerts. Targeted alerts will be sent to all SNAP households, SNAP households with school-age children, SNAP applicants, Disaster SNAP participants and previous P-EBT participants. Mass texts about food assistance and disaster food assistance in 2020 helped prompt a 300 percent increase in visits to the DCFS website, primarily to the pages devoted to food assistance.

DCFS will also use phone messaging where a longer or more nuanced message may be required. The department will also provide sample text and phone messages for schools and school districts to use in communicating directly with families who are eligible for the program.

#### **Flyers and/or push cards**

DCFS will produce printable flyers and/or push cards for schools, partners and other stakeholders to use online and in person with potential P-EBT participants. The design will incorporate the same graphics and messaging as the online portal and feature the portal as the hub for P-EBT information, tips and assistance.

#### **Social media campaign**

Social media played a major role in communication around the first P-EBT application period in spring 2020. DCFS will develop social media graphics as part of a campaign to

provide information and encouragement to families every step of the way, as they navigate the P-EBT program. The primary goal will be to direct households to the online portal for more information.

### **Media Announcements**

DCFS will make major announcements about the availability of the program and its progress through press releases to all major news outlets, stakeholders, partners and public officials. Press releases are posted online and shared through social media. DCFS will provide messaging and talking points to the Governor's Office and other public officials and partners for their use in communicating about the program.

### **LAHelpU Customer Service Center Interactive Voice Response System (IVR)**

DCFS will place on-hold recorded messages on its LAHelpU IVR to reach primarily households served by DCFS.

## **8. Over-issuance of P-EBT benefits**

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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:** [please use as much space as needed]

DCFS will make all reasonable efforts to detect over-issuances and improper payments. These efforts will include utilizing established methods and channels to receive tips, complaints, and referrals regarding P-EBT activity. We will coordinate with relevant state agencies and local authorities for case data collection and analysis, conduct follow up inquiries as appropriate, and refer cases to USDA for final claims processing

## **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, 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.

## **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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

## **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:**

---

Signature  
Print Name and Title

---

Signature  
Print Name and Title

**Date of Request:** \_\_\_\_\_