

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

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| Summary: | (1) This document is a template to assist states in the development of state plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260). |
| Disclaimer: | The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. |

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

The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT

Children in School and Child Care, 2020-2021

1. **State:** Nevada

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

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the ***date range***¹ covered by this initial plan (or subsequent amendment). *Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.*

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

¹ The date range covered by P-EBT state plan or amendment. For example: a state's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

² Note that states may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

Response:

- The date range for children in school is August 1, 2020 through June 30, 2021¹.
- The date range for children in child care is, October 1, 2020 through June 30, 2021.

The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan (or any subsequent amendments).

The estimates of P-EBT issuance during the date range coverage period are as follows:²

- Monthly issuances of \$52,801,114.51
 - Estimated monthly amount issued to school children in SNAP households is, \$20,127,127
 - Estimated monthly amount issued to school children in non-SNAP households is, \$28,032,822
 - Estimated monthly amount issued to non-school children in child care is, \$4,641,165 (\$41,770,490 / 9 months)

Child care calculations:

| County District | Eligible Days Based on Predominate Learning Model Per District | # of Children in Child Care Per County District | Daily Benefit Amount | Total by County District |
|-----------------|--|---|----------------------|--------------------------|
| Churchill | 69.93 | 388 | \$6.82 | \$185,045.97 |
| Clark | 108.85 | 52,903 | \$6.82 | \$39,272,912.37 |
| Douglas | 69.93 | 221 | \$6.82 | \$105,399.89 |
| Elko | 38.85 | 732 | \$6.82 | \$193,948.52 |
| Esmeralda | 31.08 | 8 | \$6.82 | \$1,695.72 |
| Humboldt | 69.93 | 290 | \$6.82 | \$138,307.55 |
| Lander | 46.62 | 60 | \$6.82 | \$19,076.90 |
| Lincoln | 0 | 65 | \$6.82 | \$0.00 |
| Lyon | 69.93 | 690 | \$6.82 | \$329,076.59 |
| Mineral | 69.93 | 89 | \$6.82 | \$42,446.11 |
| Nye | 69.93 | 967 | \$6.82 | \$461,184.15 |
| Carson City | 15.54 | 831 | \$6.82 | \$88,071.71 |
| Pershing | 0 | 85 | \$6.82 | \$0.00 |
| Storey | 0 | 5 | \$6.82 | \$0.00 |
| Washoe | 24.23 | 5,648 | \$6.82 | \$933,324.09 |
| White Pine | 0 | 131 | \$6.82 | \$0.00 |
| Totals | 684.74 | 63,113 | \$6.82 | \$41,770,490.00 |

School Children: Total issuance estimated \$481,599,480

- Estimated Closed benefit level issuance (based on preliminary data on operating days and qualifying closed school sites across the 10 mo. benefit period) = \$143,728,790
 - Estimated Hybrid benefit (based on preliminary data on operating days and qualifying hybrid school sites across the 10 mo. benefit period) = \$337,870,690
- Total issuance of \$523,369,970 (monthly estimate multiplied by the 10 months in the 2020-2021 school year for school children. Non-school children, multiplied by 9 months)
 - Estimated total amount issued to school children in SNAP households is \$201,271,265
 - Estimated total amount issued to school children in non-SNAP households is \$280,328,215
 - Estimated total amount issue to non-school children in child care is, \$41,770,490
 - The estimated total *number* of children to which the state will issue P-EBT benefits is approximately 395,141
 - Estimated number of school children in SNAP households is,138,762
 - Estimated number of school children in non-SNAP households is 193,266
 - Estimated number of non-school children in child care is, 63,113

The estimated total amount of administrative funds the state needs to complete the work described in this plan is \$4,888,014.65

- Estimated vendor costs for system enhancements is, \$1,757,055
- Estimated vendor costs for P-EBT call center is, \$1,600,000
- Estimated EBT vendor costs is, \$1,200,000
- State personnel, mainframe, and mailing costs is, \$330,959.65

Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).

Given the dependency of the implementation on FNS's approval of the state plan and administrative costs, most benefits are expected to be issued retroactively.

Following approval, DWSS will work with their vendors closely to create a benefit issuance schedule that:

- Splits benefit issuance into a minimum of three periods to reduce benefit issuance administrative costs.
- Issues benefits retroactively based on eligibility in that period.
- Issues benefits mid-month staggered over 10 days to avoid overwhelming retailers and to be able to adhere to social distancing.
- Includes dates for issuing corrections.
- Tentatively, the first benefit issuance will take place June 1, 2021 through June 10, 2021 and will cover 2019-2020 school year benefit correction, September, October, and

November 2020 benefits. The second benefit issuance will take place July 1, 2021 through July 10, 2021 and will cover December 2020, and January, February 2021 benefits. Final benefit issuance will take place August 1, 2021 through August 10, 2021, and will cover March, April, May and June 2021 benefits.

- The finalized schedule will be shared with FNS after the detailed system design is completed and approved by DWSS and NDA.

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

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

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

- Describe how the state will identify eligible school children for P-EBT. Also describe what measures the state will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.

- Describe the process that the state will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the state will take to address program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

Nevada Division of Welfare and Supportive Services (DWSS) administers the SNAP program. The Nevada Department of Agriculture (NDA) administers the National School Lunch (NSLP) and Child and Adult Care Food programs (CACFP). The Nevada Department of Education oversees local educational agencies (LEAs) and assists with statewide direct certification match efforts. Nevada has 41 National School Lunch Program (NSLP) sponsors which is comprised of school districts, Charter schools and Bureau of Indian Education (BIE) authority institutions. There are 640 NSLP school sites, 410 of which operate CEP or Provision II. As of October 31, 2020, of the 450,659 enrolled children there are 332,028 FRL eligible students in Nevada for SY2020-21. NDE and DWSS have entered into a Data Sharing Agreement for the purpose of identifying and verifying P- EBT eligible students.

NDA will provide DWSS and NDE a list of all SY2020-21 NSLP schools eligible for P-EBT, including those operating Community Eligibility Provision (CEP) or Provision II status. During SY2020-21, each school district/charter/BIE authority has re-opened under their unique approved operation plans.

Eligible School District/Charter/BIE authorities will communicate directly with parents to identify any children that could be eligible for NSLP and establish eligibility for SY2020-21 as applicable, and request parents update household information, including their address on file at their enrolled school.

SY2020-21 NSLP Free and Reduced-Price program eligibility and household contact data is collected and managed by each district/charter/BIE. This includes students who became eligible by application or direct certification during SY2020-21. In May of 2021, every district/charter/BIE authority will provide NDA and NDE with a list of SY2020-21 student eligibility data by school. NDE will consolidate these files, verify eligible schools, and validate student information with NDE Infinite Campus enrollment and FRAM records, and then provide data to DWSS. DWSS will use this data to identify eligible school children and confirm their SY2020-21 NSLP eligibility.

NDA and NDE will work with DWSS to ensure that school districts provide the most recent student data and remove students who have graduated or moved out of Nevada school districts.

Respectively, NDA will also work with DWSS to ensure that the following students are identified and determined eligible:

- Directly certified or determined “other source categorically eligible” for SY 2020-2021
- Certified through submission of a household application processed by the child’s school district for SY 2020-2021
- Enrolled in a Community Eligibility Provision school or a school operating under Provisions 2
- Directly certified, determined other source categorically eligible
- 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

Children that became eligible anytime during the 2020-2021 school year, from July 1, 2020 through June 30th, 2021 will be considered eligible the entire school year.

NDA performed a preliminary survey in February 2021 of all 41 district/charter/BIE authorities who projected an average of 170 school calendar operation days from August 1, 2020 thru June 30, 2021 - excluding staff (only) development days. The number of student calendar days and the primary district/charter/BIE operational modality each month will be reported by each district/charter/BIE authority to NDA again this Spring to determine relative limitation to schools meals access within their areas during SY2020-21, and calculate a simplified benefit issuance amount for each district/charter/BIE school enrolled students.

B. School Status

Standard for P-EBT Eligible School Status

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

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

- Describe how the state will identify, confirm, and monitor the status of individual schools. Also describe how the state will identify the period of duration of the closure, reduced hours, or reduced attendance of the state's schools.
- How will the state confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the state will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the state's plan for monitoring changes in eligible school status between the state's bi-monthly (or more frequent) collection of updated school data. Describe how the state will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

The NDE does not have access to District/Charter/BIE student level or operational status access in their Infinite Campus system at the state level. Therefore, NDA will survey all 41 Nevada school authorities in the Spring 2021 to identify the primary operating status and operating days, of all schools within their jurisdiction for each month AND, the specific date each school met the five-day threshold based on qualifying delayed opening, closed, or reduced attendance due to COVID-19.

School district/Charter/BIE school authorities responded to a preliminary NDA operation status survey in February 2021, reporting 80% of FRL eligible students received Full Distance learning from Closed school sites from August 2020 until March 2021. The remaining FRL eligible students attended schools operated either

a Hybrid or Open (fully in-person) model, with a further transition to primarily Hybrid or Open model operations in Nevada projected from March thru the end of the school year. During this survey, the largest Nevada District/Charters operating a Hybrid model reported students were on campus an average of 2.5 days/week (50%) on days when school meals were also served / available.

Due to the complexity of operations and learning models implemented, ongoing unexpected school closures or restricted attendance, and the limitations with the provision of accurate student-level in person learning attendance data by every district/charter/BIE entity during SY2020-21, using the best feasible data available, Nevada intends to utilize simplifying assumptions by issuing P-EBT benefits to students based on their enrolled District/Charter/BIE school's primary operational model and number school days for each month of benefit, either a Closed (100% benefit), Hybrid (50% benefit), or Open (no benefit) levels.

NDA will re-survey District/Charter/BIE authorities in May 2021, near the end of the school year, to establish the P-EBT household benefit issuance level for eligible children for each month during the SY2020-21 eligibility period. For each month of benefits, a qualifying District/Charter/BIE school reporting predominantly Closed operations (i.e. 100% Full Distance) during month their FRL eligible students will receive full P-EBT benefits x the number of school / operational days that month (e.g. \$6.82 x 18 days). A school reporting predominantly Hybrid model operations (part time on campus, such as an A/B schedule) enrolled FRL eligible students will receive P-EBT benefits for 50% of the operational days that month [e.g. \$6.82 x 9 days (of 18)]. Schools operating predominantly Open during any month of the P-EBT benefit period, their enrolled households will **not** receive P-EBT benefits for those months.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered childcare 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 childcare facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered childcare facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the state will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the state determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

- How will the state determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is **not** in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine that child’s eligibility? Specifically, how will the state determine that:
 - the child’s child care facility is closed or is operating with reduced attendance or hours, or
 - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any state or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your state? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the state will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each state agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the state propose? Why must the state make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

DWSS will determine the eligibility of children in child care by identifying children of ages zero (0) through 5 years and 11 months who were certified to receive SNAP benefits at any point during the months of October 1, 2020, through June 30, 2021. DWSS, has queried the SNAP eligibility database, and has determined that 63,113 meet the above criteria. DWSS will determine a monthly benefit amount for each child based on the monthly issuance amount for the school in that child’s county.

The best feasible simplifying assumption for Nevada is to match a child’s home residence zip code to the school with the highest qualifying operating model and associated operating days within that child’s county of residence using the data provided by districts to NDA. The schools within a child’s zip code will be mapped to a county and DWSS will determine the eligible benefit to determine the monthly issuance amount.

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

| SY 2020-2021 July 1, 2020 - June 30, 2021 | Free Reimbursements USDA School Meal Programs | | | |
|--|--|-----------|-----------------------|----------------|
| | Lunch | Breakfast | Snack (NEW) | Daily Total |
| Contiguous U.S. | \$3.60 | \$2.26 | \$0.96 | \$6.82 |
| Alaska | 5.79 | 3.64 | 1.56 | 10.99 |
| Hawaii, Guam, Virgin Islands, Puerto Rico | 4.20 | 2.64 | 1.13 | 7.97 |

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.

2. Breakfast rates are those received by "severe need" schools.

3. Snack rates are those for afterschool snacks served in afterschool care programs

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the state propose? Why must the state make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

Eligible children will be issued benefits equal to the federal reimbursement rate for breakfast and lunch for school year 2020-2021, as specified by the USDA. The benefit is multiplied by the number of school days NLSP-eligible children did not receive a free or reduced-price meal at the school due to the school's COVID-related closure, reduced attendance, or hours. In Nevada the daily per-child benefit is \$6.82.

Based on the February 2021 NDA District/Charter/BIE preliminary survey, most students are projected to receive instruction 169 days across 10 months in SY2020-21. The Nevada District/Charters with highest enrollments that are operating a Hybrid model reported students were on campus on days when school meals were also served an average of 2.5 days/week (50%). Since school campuses in Nevada operate at different levels of closures, delays, reduced attendance or hours, NDA will require District/Charter/BIE authorities to provide the primary learning mode for all schools broken down monthly. Nevada intends to utilize simplifying assumptions to

issue one of two benefit levels per any month for a qualifying Closed or Hybrid school: 50% (Hybrid) and 100% (Closed) benefit levels. Benefits will be multiplied times the school days reported and operational issuance level. For example:

School District A:

ABC Elementary

| Month | School Days | Primary Op model | Calculation | Benefit per Student/Mo |
|---------------|-------------|------------------|---------------------------|------------------------|
| August | 10 | Closed | \$6.82 x 10 | \$68.20 |
| September | 17 | Closed | \$6.82 x 17 | \$115.94 |
| October | 18 | Closed | \$6.82 x 18 | \$122.76 |
| November | 19 | Closed | \$6.82 x 19 | \$129.58 |
| December | 16 | Closed | \$6.82 x 16 | \$109.12 |
| January | 16 | Closed | \$6.82 x 16 | \$109.12 |
| February | 19 | Closed | \$6.82 x 19 | \$129.58 |
| March | 19 | Hybrid | \$6.82 x 10 | \$68.20 |
| April | 19 | Hybrid | \$6.82 x 10 | \$68.20 |
| May | 17 | Open | \$6.82 x 0 | \$0 |
| June | 0 | N/A | N/A | \$0 |
| Total: | 170 | | Total/FRL student: | \$920.70 |

XYZ Middle School

| Month | School Operation Days | Primary Op model | Calculation | Benefit per Student/Mo |
|---------------|-----------------------|------------------|---------------------------|------------------------|
| August | 10 | Hybrid | \$6.82 x 5 | \$34.10 |
| September | 17 | Hybrid | \$6.82 x 9 | \$61.38 |
| October | 18 | Hybrid | \$6.82 x 9 | \$61.38 |
| November | 19 | Hybrid | \$6.82 x 10 | \$68.20 |
| December | 16 | Hybrid | \$6.82 x 8 | \$54.56 |
| January | 16 | Hybrid | \$6.82 x 8 | \$54.56 |
| February | 19 | Closed | \$6.82 x 19 | \$129.58 |
| March | 19 | Hybrid | \$6.82 x 10 | \$68.20 |
| April | 19 | Open | \$6.82 x 0 | \$0 |
| May | 17 | Open | \$6.82 x 0 | \$0 |
| June | 0 | N/A | N/A | \$0 |
| Total: | 170 | | Total/FRL student: | \$531.96 |

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that states build their timelines from the date USDA approves the state's plan (Day #0).
- The timeline must include the state's tentative issuance dates. In SY 2019-2020, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP state agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in SY 2019-2020. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue **new** P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

Nevada intends to contract with a third-party vendor to enhance the existing DWSS case management system to determine P-EBT issuances, based on the data provided by NDE and the school districts. DWSS, the agency that administers the SNAP program, has contracted

with consultant vendors, in the past, to maximize IT systems and to improve our case management model at a reasonable and efficient cost.

New contracts for new scope of work and deliverables are drafted based on negotiated and approved contract terms, conditions, and rates. DWSS will contract with a vendor that has extensive experience with the existing DWSS systems to implement system enhancements for issuing P-EBT benefits per the state's P-EBT.

Nevada's approach for issuing the 2020-2021 P-EBT benefits includes enhancing the existing case management system to determine P-EBT eligibility, as well as calculating benefit amounts using an automated approach. This will allow Nevada to leverage existing system modules for correspondence, electronic communication, and reporting to support the P-EBT program needs.

The awarded vendor will also develop an online interface for authorized school district users to upload student information eligible for free or reduced lunch programs. This interface will validate information and provide an error report for each school district for further action when information is missing or invalid.

When new student information is available, automated processing batches will search for matches in the existing system and either issue additional benefits on an existing EBT card or issue a request for a new EBT card.

A high-level scope of the project has been identified. Detailed system requirements will be identified and incorporated into the system design during the requirements and design phase, based on the final approved state P-EBT plan.

Nevada intends to use a phased approach timeline *Please note the dates in the timeline below are subject to change depending on P-EBT Plan approval.

- **Phase I:** In the first phase, 2019-2020 benefit issuance errors will be corrected. NDE and school districts will provide FRL student data, and mode of learning data to DWSS. Public notice campaign will begin, and the P-EBT Call Center will be activated.
- **Phase II:** In the second phase, system enhancements to process student information, create benefit cases in the system, determine eligibility, and send benefit information to the EBT card vendor will be implemented. Once this phase is implemented, DWSS will be able to issue benefits to eligible students in 2020-2021.
- Benefit issuance will be staggered. Tentatively, the first benefit issuance will take place June 1, 2021 through June 10, 2021 and will cover 2019-2020 school year benefit correction, September, October, and November 2020 benefits. The second benefit issuance will take place July 1, 2021 through July 10, 2021 and will cover December 2020, and January, February 2021 benefits. Final benefit issuance will take place August 1, 2021 through August 10, 2021, and will cover March, April, May and June 2021 benefits.

- **Phase III:** In the third phase, P-EBT reporting requirements will be implemented, and statistical reports will be generated.
- **Production Support: Vendor** production support will begin after Phase I goes live and continue to the last day of the project. During production, support issues in the production environment will be reported and resolved.
- **Project Management:** Project management activities and oversight will be ongoing during the duration of the project.

For SNAP households, the P-EBT benefit will be placed on the existing SNAP card. For Non- SNAP households, a new P-EBT card will be issued. Nevada will utilize the EBT vendor’s P- EBT card stock and will not request a specific state design.

EBT Benefit Type:

Nevada will utilize benefit type FSHFKA for the P-EBT benefit, which was approved in the 2019P-EBT plan.

Benefit Spend Priority:

For SNAP households, P-EBT benefits will have the first spend priority.

Expungements:

Expungements for both SNAP and non-SNAP households will occur according to the normal expungement rules.

Returned Mail:

Undeliverable cards will be returned to DWSS. DWSS will work with NDE and the school districts to determine if another address exists. If another address exists, DWSS will update the customer’s information in the EBT vendor system and mail the card to the new address.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages states to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

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

- How will the state resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the state's public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

Issuance Errors:

Nevada intends to contract with a third party P-EBT call center. Individuals can reach out directly to the P-EBT Call Center to dispute their benefit amount or eligibility for P-EBT benefits. These disputes will be tracked on a tracking sheet and provided to

designated P-EBT staff and/or the EBT Coordinator for investigation. The disputing household may be asked to provide additional verification if staff are not able to determine if there was an issuance error. Once any necessary documentation is provided and reviewed, staff will reach out to the household to inform them of the final determination.

Access Issues:

Nevada is committed to equitable access for all eligible families regardless of circumstances. DWSS will work with NDE and the school districts to address issues related to families who have not received their cards due to outdated addresses or lack of a permanent address.

Those with limited English proficiency will be able to speak with designated P-EBT staff, via an interpreter, and mailings will be provided in both English and Spanish. Additionally, individuals are not required to have internet access in order to receive benefits, and DWSS does not use social security numbers as part of the matching process.

Public Awareness Campaign:

The state will conduct a public information campaign through use of websites and social media platforms. Nevada intends to issue a press release to target statewide and local news organizations. The state will work with schools and community organizations to push out template emails and flyers. Additionally, a “Check My Benefit” page will be added to Nevada’s online eligibility system, Access Nevada. This page will provide customers with information about their P-EBT benefits.

Information to P-EBT recipients:

Both SNAP and non-SNAP recipients will receive a mailing with the following information:

- A description of P-EBT
- Instructions on how to PIN the EBT card (P-EBT only cases)
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., only to purchase non-taxable food items)
- An indication that benefits are non-transferable
- Instructions for destroying the card if they want to decline the P-EBT benefits (P-EBT only cases)
- Information regarding the P-EBT Call Center
- Information providing an explanation of EBT fraud violations, and penalties associated with EBT fraud.

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: [please use as much space as needed]

Nevada will utilize the most up-to-date information available in processing the P-EBT benefits, as this information is essential in avoiding incorrect issuances. DWSS will work with NDE, NDA, and school districts to ensure the data is updated on an ongoing basis.

Any potential benefit over-issuance that DWSS learns of will be tracked on a spreadsheet for investigation and resolution. In no instance will Nevada reclaim P-EBT benefits by reducing a SNAP household's SNAP benefit.

10. Benefit Issuance Reporting

The state agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover state level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each state, for the period of performance October 1, 2020 through September 30, 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of

Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all state agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, 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.

FY 2021 P-EBT State Administrative Cost Grant Awards will be administered by DWSS. These costs include; vendor costs for system enhancements, vendor costs for P-EBT call center, costs for EBT vendor, and state personnel, mainframe, and mailing costs. The period of performance for these Local Level P-EBT grants is beginning October 1, 2020 and ending September 30, 2021. DWSS will submit the expenditures on the FNS-778, and will align with the expenditures outlined in the FNS-366(a).

FY 2021 P-EBT Local Level Administrative Cost Grant Awards will be administered by NDA for the purpose of reimbursing local sponsors for administrative costs incurred in the delivery of P-EBT. NDA will establish reimbursement for districts/charters/BIE authorities to submit their allowable local level P-EBT expenses upon approval of the state plan. The period of performance for these Local Level P-EBT grants is beginning October 1, 2020 and ending September 30, 2021, with expenses submitted to WRO in two intervals, May, and August 2021.

NDA will report quarterly on a separate CN Financial Report Form, FNS-425 within the required quarterly and Final Financial timeframes.

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

Nevada 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

Nevada 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, Child Nutrition and Education State Agency Officials:



Signature

Print Name and Title: Steve H. Fisher Administrator Division of Welfare



Signature

Print Name and Title: Peter Zutz, Administrator, NDE, ADAM Office

Homa Anooshehpoor Digitally signed by Homa Anooshehpoor
DN: cn=Homa Anooshehpoor, o=NDA, ou=Food and
Nutrition, email=hanooshehpoor@agri.nv.gov, c=US
Date: 2021.04.14 14:58:05 -07'00'

Signature

Print Name and Title: Homa Anooshehpoor, Administrator

Date of Request: 04/20/2021