

**State Plan for Pandemic EBT: Children in Child Care
School Year 2021-2022**

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 children in schools or childcare during school year (SY) 2021-2022. (2) This document relates to Section 4601 of the Continuing Appropriations Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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

The P-EBT Assistance for Children in Schools and Child Care is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

**State Plan for Pandemic EBT: Children in Child
Care 2021-2022**

1. **State:** Montana

2. **Primary Citations:**

- a. Families First Coronavirus Response Act (FFCRA);
- b. Continuing Appropriations Act, 2021 and Other Extensions Act;
- c. Consolidated Appropriations Act, 2021;
- d. American Rescue Plan Act of 2021

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

a. The *date range* covered by this State plan or amendment.

- For children in school
- For children in childcare

✓ **Montana's Response:**

Montana plans to issue P-EBT benefits to children of SNAP households, in childcare only. The anticipated date range will be September 1, 2021 – May 31, 2022

b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.

- Estimated amount issued to non-school children in childcare, receiving SNAP benefits.

✓ **Montana's Response:**

Montana estimates 16,771 children will be eligible for a \$35 monthly benefit (estimated based on analysis of Fall semester months), multiplied by 9 months of eligibility, for an estimated maximum total issuance of approximately \$5,282,865. Montana commits to inform FNS of any significant changes in expected P-EBT benefits issuance following analysis of childcare access and benefit amounts for the Spring semester.

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

- Estimated number of non-school children in childcare, receiving SNAP benefits

✓ **Montana's Response:**

16,771 children under age 6, enrolled in SNAP (average caseload from September 1, 2021 – May 5, 2022). Montana commits to inform FNS of any significant changes in expected P-EBT benefits issuance.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²

✓ **Montana's Response:**

Montana anticipates the total amount of administrative funds needed to complete the work described in this State plan/amendment is \$84,870 (\$9,430 per month multiplied by 9 months). Montana commits to inform FNS of any significant changes in expected P-EBT administrative expenses.

- 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 childcare

✓ **Montana's Response:**

Montana plans to issue P-EBT benefits to children in childcare, under age 6 receiving SNAP benefits. The anticipated schedule is outlined below:

- P-EBT benefits for September 1, 2021 – December 31, 2021, are tentatively scheduled for July 2022
- P-EBT benefits for January 1, 2022 – May 31, 2022, are tentatively scheduled for August 2022
- P-EBT benefits for Summer 2022 (if later approved by FNS) will be tentatively scheduled for late August 2022
- Contingency/Corrections issuance for SY 2021-2022 is slated for September/October 2022

4. P-EBT for School Children

A. Eligible Children

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 is enrolled in SNAP in the benefit month
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 childcare 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 school children and confirm their eligibility for P-EBT.

✓ **Montana's Response:**

Montana will conduct two semester-long assessments of statewide eligibility for issuing P-EBT benefits to children under 6 years of age receiving SNAP benefits, looking at Child and Adult Care Food Program (CACFP) lunch claim data (explained below) as an indicator of access to childcare meals for the SNAP Under 6 population. If the majority of SNAP Under 6 caseloads (children receiving SNAP between September 1, 2021 – May 31, 2022, and under the age of 6 as of August 1, 2021) is found to have reduced access during each period, Montana will proceed to the next step of monthly child-level benefit eligibility for that period.

From analysis of the CACFP Lunch Claim data (detailed on page 6), Montana DPHHS determined that Montana's childcare system continues to operate during the Fall 2021 semester at significantly reduced capacity due to the COVID-19 pandemic. The most recently available data shows a 24.3% reduction in CACFP lunches served between September 1, 2021, through December 31, 2021, compared against pre-pandemic levels.

Informed by the data that shows reduced childcare access, Montana proposes to determine all children enrolled in SNAP and under age 6 as of August 1, 2021, eligible for P-EBT childcare benefits throughout the state. Montana will conduct an additional statewide analysis of P-EBT eligibility for Spring semester months of January 1, 2022 – May 31, 2022. If this analysis shows that there is no longer reduced access to childcare for a month within the period in question, Montana will not assign benefits for that month.

Once it has been determined that statewide childcare access remains reduced for that semester, Montana will identify all children in Montana's eligibility system (CHIMES) who were under age 6 as of August 1, 2021 and will issue

P-EBT benefits only for the months the child was enrolled in SNAP between September 1, 2021 – May 31, 2022. This age cutoff date is in alignment with stat regulation that requires children turning age 6 on or before August 1 to attend school. A child who turns 6 after August 1, 2021 for the months they received SNAP benefits will be eligible under the P-EBT Childcare plan through May 31, 2022, under a proposed simplifying assumption that the child will continue to participate in childcare for the remainder of the school year.

- How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

✓ **Montana’s Response:**

Montana DPHHS (SNAP agency) will determine P-EBT eligibility using its existing SNAP eligibility system, CHIMES.

- How will the State confirm that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)

✓ **Montana’s Response:**

Montana is not basing childcare eligibility on proximity to area schools in this plan.

- 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 childcare facility is closed or is operating with reduced attendance or hours, or
 - The child’s childcare facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?

✓ **Montana’s Response:**

Montana is not basing childcare eligibility on proximity to area schools, closures, or reduced attendance in this plan

- Are there any State or local public health ordinances that limit the capacity of childcare 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?

✓ **Montana’s Response:**

There are no State or local public health ordinances that limit the capacity of childcare facilities in response to COVID-19 in Montana.

- 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 childcare 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)

✓ **Montana’s Response:**

Montana anticipates retroactively issuing P-EBT benefits to children eligible under this Childcare Plan, so no prospective eligibility determinations will be necessary. As stated above, Montana proposes to assess historical CAFP lunch data as a proxy for childcare access on a semester-long basis.

- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29)

✓ **Montana’s Response:**

Montana proposes to set a standard monthly P-EBT childcare benefit at 24.3% fully virtual benefit for school age children (set at 20 days = \$142 per month) for the months of September 1, 2021 – December 31, 2021. This is \$34.51 which equates to \$35 per month, when rounded to the nearest whole dollar. This benefit level is based on DPHHS’ most recent analysis of CACFP data that shows participation is 24.3% below pre-pandemic levels in a year-over-year comparison (2019 vs. 2021) of Fall semester months. To determine the benefit level for the Spring semester months, DPHHS will compare CACFP lunch data for the months of January 1, 2022 – May 31, 2022, to the pre-pandemic months of January 1, 2019 – May 31, 2019 and set the benefit in the same manner as described for Fall semester. See page 7 for additional details on this calculation.

- 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)

✓ **Montana’s Response:**

DPHHS, with the help of its eligibility system vendor (Deloitte), will identify the eligible SNAP Under 6 population based on age requirements and monthly SNAP participation described above.

DPHHS is utilizing data that the Montana Early Childhood & Family Support Division submits to FNS on CACFP lunch reimbursement claims. Early Childhood & Family Support Division will play a support role in communicating SNAP Under 6 P-EBT program information to the early childhood community.

- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

✓ **Montana’s Response:**

As stated above, Montana proposes two simplifying assumptions:

- First, Montana proposes the simplifying assumption that a child who turns 6 after August 1, 2021, will remain in childcare for the remainder of the school year
- Second, Montana proposes a simplifying assumption to determine all children under age 6 and enrolled in SNAP to be eligible for P-EBT benefits statewide, based on a DPHHS analysis showing that Montana’s childcare system continues to operate at significantly reduced capacity across the state due to the COVID-19 pandemic.

DPHHS is utilizing data that Early Childhood & Family Support Division submits to FNS on CACFP. As shown in Table 1 below, the count of lunches served statewide in Fall of 2021 was well below pre-pandemic levels of 2019. This is largely due to childcare programs being forced to close in response to the pandemic, as well as concern about the transmissibility of the highly contagious Delta and Omicron variants that began circulating among children not yet eligible for vaccines in Fall 2021.

Table 1: Number of CACFP Lunches Served – Homes & Centers Excluding At-Risk Center Lunches in Montana 2019 and 2021

	2019	2021	Difference	% Change
September	163,877	136,362	(27,515)	-17%
October	212,031	132,402	(79,629)	-38%
November	173,606	135,725	(37,881)	-22%
December	163,097	135,226	(27,871)	-17%
Grand Total	712,611	539,715	(172,896)	-24.3%

5. Benefit Levels

<p><i>Standard for Benefit Levels</i></p> <ol style="list-style-type: none"> 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 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.
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<p>SY 2021 - 2022 July 1, 2021 – June 30, 2022</p>	<p>Free Reimbursements USDA School Meal Programs</p>
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	Lunch	Breakfast	Snack	Daily Total
Contiguous US	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	\$6.03	\$3.78	\$1.63	\$11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	\$4.37	\$2.74	\$1.17	\$8.28
Notes:				
<ol style="list-style-type: none"> 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 4. Source: https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf-2021-15107.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 questions in detail.

✓ **Montana’s Response:**

As noted on page 6, Montana proposes to set a standard monthly P-EBT Childcare benefit for the Fall 2021 semester months at 24.3% of the fully virtual benefit for school age children (set at 20 days = \$142 per month). This equates to \$35 per month for each of the Fall semester months.

This benefit level is based on DPHHS’ most recent analysis of CACFP data that shows participation 24.3% below pre-pandemic levels through Fall semester months (2019 vs. 2021). To determine the benefit level for the Spring semester months, DPHHS will compare CACFP lunch data for the months of January 1, 2022 – May 31, 2022 to the pre-pandemic months of January 1, 2019 – May 31, 2019 and set the benefit in the manner as described. DPHHS will send the state’s spring lunch claims data and benefit calculation to MPRO before the issuance for review.

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 2020-2021, 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.

✓ **Montana’s Response:**

Montana plans to issue childcare P-EBT benefits using a staggered plan and aligning with the issuance schedule for current SNAP households. This will allow for streamlined benefit issuance. The below dates are tentative and contingent upon other factors:

Timeline of Events	
Late May 2022	• Approval of P-EBT plan by FNS
June 2022	• System vendors (SNAP eligibility and EBT) code and test P-EBT benefit issuance based on approved plan
July 2022	• P-EBT benefits issued for Fall semester childcare children
Early August 2022	• CACFP data for Spring semester is finalized
August 2022	• P-EBT benefits issued for Spring semester childcare children
September/October 2022	• Contingency issuance for SY 21-22 corrections including to childcare children

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?

✓ **Montana’s Response:**

As was done with previously P-EBT issuances, all SNAP Under 6 P-EBT eligible children will be issued P-EBT benefits to the SNAP case/card they were actively receiving benefits on during the particular month within the covered period. There is no new SNAP card design.

- 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 2020-2021. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.

✓ **Montana's Response:**

This will be done the same as Montana's previous plans.

- 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.

✓ **Montana's Response:**

Montana will continue to set P-EBT benefits to spend-first.

- 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.

✓ **Montana's Response:**

Montana will follow the same process for expungement as regular SNAP benefits, and as identified in previous P-EBT plans.

- 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?

✓ **Montana's Response:**

As was done under previous plans, all SNAP Under 6 P-EBT eligible children will be issued P-EBT benefits to the SNAP case they were actively receiving benefit on during a particular month within the covered period. It will be noted that these benefits are P-EBT in the issuance file.

If a household/client no longer has their card, they will be directed to request a new EBT card from the EBT vendor, Solutran.

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.

- How will the State resolve dispute 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.

✓ **Montana's Response:**

Montana will have a phone line and email address set up to address any issuance errors. There will be designated staff to research the questions and take appropriate action as needed, based on the client request. Disputes will be tracked on a spreadsheet to ensure that whatever caused the issuance error is corrected for any subsequent issuances. Montana will reach out to the client once a determination is made to let them know the outcome.

- 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.

✓ **Montana's Response:**

As indicated in previous plans, Montana is committed to equal access for all families regardless of their circumstance. Montana will work with established community partners, vendors, and families, if needed, to ensure that all eligible children receive the benefits.

Montana is not requiring a Social Security Number for any P-EBT families.

- 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).

✓ **Montana's Response:**

Montana will conduct a public information campaign to alert those receiving benefits of the purpose of P-EBT and how it should be used. Montana will work with community partners to do a general information campaign for families.

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the 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?

✓ Montana's Response:

Montana will send a custom letter to each household receiving Childcare P-EBT benefits. Montana will use the same dedicated web landing page and email address that were used previously: <https://dphhs.mt.gov/pebt> and hhshcsdpebt@mt.gov. (Please note, the webpage is not currently active and will be launched as part of our direct communications campaign.) Information will also be available by calling the Public Assistance Helpline at 1-888-706-1535.

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.

✓ **Montana's Response:**

This will be done in accordance with Montana's previous plans. Montana will contact USDA whenever an issuance error is identified and provide a description of the error, the number of children involved, and the value of the over-issuance before a corrected benefit amount is issued to a different household and before attempting to reclaim benefits. Households will be given effective notice in the plan and/or in other communications that Montana may correct mistakes in P-EBT issuances.

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, 2021 through September 30, 2022. 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
Andrea Cheroske, SNAP Program Manager, HCSD, MT DPHHS

Signature
Gene Hermanson, Administrator, HCSD, MT DPHHS

Date of Request: 5/19/2022