

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

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Summary:	(1) This document is a template to assist states in the development of state plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2022-2023. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

Additional context and background for this document can be found at State Guidance on Coronavirus P-EBT: [Click Here](#)

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

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

1. State: Nevada

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

3. Executive Summary:

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

- a. The **date range** covered by this state plan or amendment
 - for children in school **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - for children in childcare **September 1, 2022 – May 11, 2023 (the date the PHE declaration is set to end).**
- b. Estimated monthly and total **amount** of P-EBT benefits the state will issue within this plan/amendment's date range. **TBD (these levels will be set once DWSS receives the 2022 CACFP lunch claim data.)**
 - Estimated amount issued to school children in SNAP households. **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - Estimated amount issued to school children in non-SNAP households. **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - Estimated amount issued to non-school children in childcare.
Based on lunch claim data from the Fall 2022 months, Nevada estimates that it will issue \$14.2 Million. This estimate was calculated as follows: 65,000 x \$25.77/month x 8.5 months = \$14.2 Million.
- c. Estimated total **number** of children to which the state will issue P-EBT benefits.
 - Estimated number of school children in SNAP household's **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - Estimated number of school children in non-SNAP household's **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - Estimated number of non-school children in childcare **Approximately 65,000**

¹ The date range covered by P-EBT state plan or amendment. A state's plan will typically cover the instructional months in the state's school year (September 2022 through June 2023, for example).

- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP household’s **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - School children in non-SNAP households **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**
 - Children in childcare
 Nevada will have two benefit issuances. Tentatively, the first one will occur mid to late July, for the Fall Semester, and the second one will occur in the mid to late August, for the Spring Semester. Any necessary data clean up issuances, will occur in early September.
- e. Names of state agencies involved in administering this plan.

Response: State of Nevada Division of Welfare and Supportive Services (DWSS) SNAP.
 State of Nevada Department of Agriculture (NDA) CACFP.

4. P-EBT for School Children (see Q&As #7-25)

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 2021-2022, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2021-2022, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application **and** the school district has not made a new school meal eligibility determination for the child in SY 2021-2022.
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. Please describe separately for the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT (see Q&As #16 and #25). Also describe what measures the state will take to prevent the issuance of benefits to school year 2021-2022 graduates and other non-students.

- How will the state determine and/or confirm each child’s eligibility for free or reduced-price meals?² 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), children who become eligible during the school year, and the subset of children enrolled in non-NSLP-participating fully virtual institutions or homeschooling who may be eligible for P-EBT.
- How will the state confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- If the state’s schools will continue to impose temporary virtual or hybrid schedules, describe the process that the state will use to update each child’s in-person and virtual schedules (see Q&A #12). How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the process that the state will use to identify individual students’ COVID-related absences or virtual learning days, including the process to identify, confirm and monitor the enrollment status of children in non-NSLP-participating fully virtual institutions or homeschooling.
- 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. (*Please review Q&A #25 on simplifying assumptions regarding fully virtual schools and homeschooling.*)

Response: [please use as much space as needed] **N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.**

² The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools, expiration date 7/31/23.

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 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: [N/A Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children.](#)

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

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

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

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

- how the state will identify eligible children and confirm their eligibility consistent with the above standard, DWSS, the state agency that administers the SNAP program, will query the SNAP data in the DWSS eligibility system, to identify children under the age of 6 and that were an eligible member of a DWSS SNAP household, in the months of September 2022, through May 11, 2023 (prorated month based on the ending of the PHE emergency declaration). P-EBT eligibility will be determined monthly. Please note: Nevada is making the reasonable simplifying assumption that children who began receiving SNAP benefits as a 5-year-old earlier in the school year remain enrolled in a covered childcare facility through the end of the school year. This simplifying assumption only applies to the child’s continued enrollment in childcare. P-EBT benefits will only be issued to eligible childcare aged children in the months in which they are enrolled in SNAP from September 2022 through May 11, 2023. P-EBT childcare benefits end, when the SNAP enrollment ends in the covered timeframe.
- how the state will set benefit levels for children, The state will set an average monthly P-EBT childcare benefit using the reduction in aggregate CACFP lunch claims from School Year (SY) 2022-2023 compared to the SY prior to the pandemic, SY 2018-2019 (March 2019-May 2019) and SY 2019-2020 (September 2019-February 2020) as reported by the state of Nevada Department of Agriculture (NDA), the average number of school instructional days over the course of SY 2022-2023, and the SY 2022-2023 P-EBT benefit per day. Please see the tables 1-3 below. Please note the final data for the fall semester, will not be available until April 2023 and June 2023, for the spring semester.

Table 1: Reduction in CACFP lunch claims – Fall Semester

*This field will be completed once the December 2022, CACFP lunch claims data is available.

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
September 2019	102,185	September 2022	86,472	
October 2019	112,232	October 2022	83,938	
November 2019	84,512	November 2022	76,118	
December 2019	*	*	TBD	
Total	298,929	Total	246,528	-17.5%

Table 2: Reduction in CACFP lunch claims – Spring Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester: To be applied to daily rate and number of school instructional days per month.
January 2020		January 2023	TBD	
February 2020		February 2023	TBD	
March 2019		March 2023	TBD	
April 2019		April 2023	TBD	
May 2019		May 2023	TBD	
Total	0	Total	0	

Table 3: Benefit Calculation.

*The 17.5% reduction is an estimate as of March 2023, these amounts are subject to change based on additional CACFP lunch claims data for December 2022.

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit	Total Benefit
Sept, Oct, Nov, December 2022	17.5%	18	4	\$ 8.18	* \$ 25.77	* \$ 103.07
January-April 2023	TBD	18	4	\$ 8.18	\$ -	\$ -
May-23	TBD	9	1	\$ 8.18	\$ -	\$ -

- Any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions. Nevada is making the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in the school year remain enrolled in a covered childcare facility through the end of the school year. This simplifying assumption only applies to the child’s continued enrollment in childcare.

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

- The state will confirm that there has been a statewide reduction in access to childcare for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.

- The state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44³. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

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

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

- How will the state determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #30)
- For children whose residence is **not** in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the state determine those children's eligibility? (See Q&A #32-33). Specifically, how will the state determine that:
 - the child's 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?
- 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?
- 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

³ The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

be updated? (Note that this information must be updated no less frequently than every other month.)

Response: N/A. Nevada will be using the CACFP data method.

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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

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

Notes:

1. Lunch rates include the 8 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.
3. Snack rates are those for afterschool snacks served in afterschool care programs
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

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

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

Response: N/A. Nevada will be using the CACFP data method.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all state agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between

them. USDA suggests that states build their timelines from the date USDA approves the state's plan (Day #0).

- The timeline must include the state's tentative issuance dates. In past years, most states issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage states to continue.
- Examples of other possible milestones include, but are not limited to:
 - The DWSS P-EBT hotline is currently active and will remain active until the close out of the P-EBT program for the 2022-2023 school year.
 - Communication with the school district stakeholders has already begun by DWSS, NDA, and NDE. The DWSS website will be updated upon approval of this plan.
 - P-EBT flyers will be created and shared with the general public by the end of May 2023.
 - Social media sites will be used to inform the public of any P-EBT related updates.

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?
The state will only be issuing SY 2022-2023 P-EBT to childcare aged children who were on SNAP in the months of September 2022 (the beginning of SY 2022-2023) through May 11, 2023 (the date the PHE declaration is set to end). P-EBT benefits will be deposited on the childcare aged child's household's existing SNAP EBT card.
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states' ability to report and USDA to maintain accountability for P-EBT.
The state will continue to use benefit type FSHFKA, 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.
First in, first out.
- 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.
The state will follow the standard SNAP expungement rules.
- 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?
N/A benefits will be deposited on existing SNAP EBT cards.
- Will you issue **new** P-EBT cards to existing P-EBT households? **N/A** Nevada will only be issuing SY 2022-2023 P-EBT, to childcare aged children. Benefits will be deposited on an existing SNAP EBT card.

- 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?

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.

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

- How will the state resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the states, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
 - DWSS will continue to utilize its P-EBT unit, which is dedicated to resolving disputes and inquiries regarding P-EBT eligibility. Parents will be able to contact this unit through designated phone lines and the P-EBT email account. The unit will communicate benefit issuance dates, benefit levels, and program eligibility. They will also communicate the ending of the public health emergency on May 11, 2023 and how it affects their May benefits.
- Please describe how the state will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
 - Nevada will only be issuing SY 2022-2023 P-EBT to childcare aged children who were on SNAP in the months of September 2022 (the beginning of SY 2022-2023) through May 11, 2023 (the date the federal PHE declaration is set to end). P-EBT benefits will be deposited on the childcare aged child's household's existing SNAP EBT card. There should not be any issues with access to the P-EBT benefits. If the household has lost, or damaged their existing EBT card, they have multiple ways to receive a replacement card. They can come into any DWSS front line eligibility office, call the EBT vendor

customer services line, utilize the EBT processor's online customer portal, or call the DWSS P-EBT call center.

- 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).
 - DWSS will conduct its public information campaign by directly providing information through social media posts, press releases, and informational updates on the DWSS website and Access Nevada P-EBT web portal. Additionally, DWSS has begun working with the school district partners through NDA and NDE to create and promote P-EBT Program information. This will include a P-EBT informational flyer that will be distributed to schools, parents/guardians, retailers, and the general public. We will also share this flyer with our community partners to assist with reaching out to families with children that are not yet attending school. The flyer will clearly explain the end of the public health emergency on May 11, 2023 which resulted in the prorated benefits for May and also that because of its end, child care aged children will not be eligible for Summer P-EBT benefits.

- 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.
 - While there have never been instances where a household had denied a P-EBT benefit on their household's EBT card, households will be given instructions on how to destroy their EBT cards if they decline the benefit.

- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, states, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable

- Instructions for destroying the card, if they want to decline benefits
- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: Upon the first issuance of the P-EBT benefits, a notice will be generated and mailed to the address provided for the head of household on the SNAP case. This notice will provide a general explanation of P-EBT eligibility and where P-EBT can be used and explain the prorated benefits for the month of May due to the fact that the public health emergency ends on May 11th.

9. Over-issuance of P-EBT benefits

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

states should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. states cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, states should develop P-EBT-specific rules and procedures and include those in their state plans. states must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the state's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a state's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. states that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the state may attempt to recover benefits or reduce a future issuance. Under no circumstances may the state reduce a SNAP benefit to settle a P-EBT claim.

Finally, the states recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold state agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your state will manage P-EBT payment errors.

Response: If DWSS identifies any over-issuances, they will contact USDA FNS prior to taking any action to the case. In instances where there is an over-issuance, Nevada will track the information on the "NV PEBT Overissuance Tracker Template" provided by the USDA. Nevada will not pursue claims against P-EBT over-issuances. Nevada will mitigate over-issuances by using a direct issuance strategy, retroactively issuing benefits, and ensuring deduplication, so no child receives more than one P-EBT benefit in a month.

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.

[DWSS acknowledges this and will complete all applicable FNS reports.](#)

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, 2022 through September 30 2023. As the authorized grantee, the SNAP state agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related state administrative costs may be incurred by state agencies other than the SNAP state agency, the SNAP state agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective state agencies responsible for delivering P-EBT benefits. The SNAP state agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

As noted in Item 9 above, the SNAP state agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

[DWSS acknowledges this and will submit a cost plan to FNS upon approval of our P-EBT plan.](#)

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize state educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

14. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. If the state wishes to change any of the terms of its plan, the state shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:

 03/27/2023

Signature

Robert Thompson, Administrator, Division of Welfare and Supportive Services

Patricia Hoppe

Digitally signed by Patricia Hoppe
DN: cn=Patricia Hoppe, o=NV Department of Agriculture,
ou=Food & Nutrition Division, email=pxhoppe@agri.nv.gov,
c=US
Date: 2023.03.27 17:11:23 -0700'

Patricia Hoppe
Interim Administrator, Division of Food
and Nutrition
Nevada Department of Agriculture

Date of Request: 03/28/2023