

**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:** Montana

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

Response:

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.

Montana is proposing to build off the previously approved P-EBT plan for September 2020. The date range for the current plan will be from October 1, 2020 to June 30, 2021. Montana commits to informing the USDA of any significant increases or decreases in these data points during the date range covered by the initial plan. Please note that these dollar amounts are estimated and are subject to change due to the student/school model.

We estimate to issue P-EBT benefits in the following amounts³:

- Monthly issuances of **\$1,699,230.28**⁴
 - Estimated monthly amount for known SNAP children is **\$1,020,244.72**
 - Estimated monthly amount to Non-SNAP children is **\$667,241.52**
- Total issuance of **\$15,293,072.50** (monthly estimate multiplied by the nine months (October 2020 to June 2021) remaining in the 2020-2021 school year)
 - Estimated total issuance to school children in SNAP households is **\$9,182,202.48**
 - Estimated total issuance to school children in Non-SNAP households is **\$6,005,173.68**

The estimated total *number* of children to which Montana will issue P-EBT (based on Spring 2020 figures) is 22,548.

- Estimated number of school children in SNAP households is 13,694.
- Estimated number of school children in Non-SNAP households is 8,854.

Montana will utilize the already awarded \$763,251.00 in administrative funds but would like to reserve the opportunity to amend their plan, if more funds are needed. These funds will be used to pay for system updates, staff, and other needs.⁵

Montana intends to issue P-EBT benefits retroactively in 4 issuances.

- October and November 2020—Issue approximately 30 days after Approval
- December 2020 and January 2021—Issue by April 30, 2021
- February and March 2021 – Issue by May 31, 2021
- April, May, and June 2021—Issue by June 30, 2021

4. P-EBT for School Children

A. Eligible Children

³ These estimated are subject to change based on student/school learning model and fluctuation in those models.

⁴ Montana anticipates these number to ultimately be an estimate of eligible students as many school districts are using a hybrid approach to teaching for the school year. This amount is also based on schools operating in a fully remote status as outlined below. Any significant changes will be reported.

⁵ These estimates cover the anticipated administrative costs from October 2020 to June 2021.

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]

The following entities are involved in the administration of P-EBT:

- Montana’s Human and Community Services Division (HCSD) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.
- Montana’s Office of Public Instruction (OPI), in collaboration with local school

districts, is responsible for eligibility determination through the direct certification process, the NSLP application process and the monitoring and collection of student eligibility.

To identify eligible school children and confirm their eligibility, Montana will use data provided directly by the school districts with collaboration from OPI. OPI and HCSD will provide detailed instructions to the school districts. *Montana is asking all the schools to complete a spreadsheet. This spreadsheet will have a drop down for the school to select the student learning style (hybrid or remote) for the month. This dropdown is how the benefit amount is determined and issued. Schools will also be instructed to select the learning style that the student has used for most of the month, if there is a change.* The instructions will step out what data is needed and how it is to be compiled. *HCSD and OPI will also be hosting at least 2 zoom meetings with the school districts in Montana to provide clear, verbal instructions as well as allowing schools an opportunity to ask questions.* The data will include the student's name, date of birth, parent/guardian name, current mailing address, learning style for each month (remote, hybrid, fully in-person), confirmation of free/reduced meal status, and if hybrid how many days they attended school remotely each month based on the school district, not the child. The school will also be asked to add all the newly eligible children by way of direct certification, other eligible sources (including CEP schools) or via the 2020-2021 school year national School Lunch program (NSLP) approved household applications. *Montana is collecting new data for the 2020-2021 school year. Schools will be instructed not to include any students that have graduated or are no longer enrolled in their school district in their list. Montana is gathering this data retroactively so we anticipate that all newly eligible students will be included as soon as they are determined eligible. All newly eligible students will have benefits issued retroactively to beginning of the school year.*

A uniform process will be used for all students (SNAP recipients and Non-SNAP recipients) to confirm each student's lack of access to meals at school. School districts are to be tracking the student's learning mode (remote, hybrid, or fully in-person). For P-EBT, private schools that administer NSLP will be required to track a student's learning mode and provide that information to HCSD. A student's learning mode classification will confirm their access to meals at school and P-EBT level. Montana intends to leverage simplifying assumptions to issue two benefits amounts. One amount for hybrid students and one amount for fully remote students (details are provided in the Benefit Level section). *The simplifying assumption details are we will use one standard benefit amount for all children that are hybrid, instead of calculating each child based on their days attended. This will ensure that the hybrid children receive an average benefit for their school schedule. Not all schools in Montana had the same hybrid approach.*

Montana is planning to issue P-EBT benefits retroactively in bi-monthly increments, *except for June 2021. That month will be included in our last issuance due to it being only a partial benefit based on an average number of days that schools are still in session.*

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]

Montana will identify, confirm, and monitor the status of individual school *districts*, with the reporting from the Office of Public Instruction based on the reports they receive from the school districts. OPI will confirm the school districts schedule, including reduction of hours, and any dates of school closures. Montana will be informing schools of how to count the 5 consecutive days to determine eligibility for P-EBT for the students in their school district. If a school has reduced attendance or hours for at least 5 consecutive days during the school year, the school will be deemed eligible for the P-EBT program for the entire school year. *Schools in Montana will report in their initial report how they met the 5-day requirement. Montana will ask that schools report what criteria they met to satisfy the 5-day requirement. Their options will be Late Start, Reduced Attendance, or Reduced Hours. We will also ask that they attest to this being for 5 consecutive days. Any school that does not report this information will not be eligible to report their student data for P-EBT as they will be deemed ineligible. This will also be detailed in the instructions sent to them.* In addition, the method

of instruction for each *student* will also be tracked. *Schools will report the student learning style monthly and the report will be sent to HCSD every other month. The reports will specify the learning models for each month in the 2-month period.*

Montana is capturing the learning style for the student retroactively and anticipate that this will allow for changes to the student's schedule to reported and acted on. If a parent or guardian expresses a discrepancy with the amount issued, HCSD will work with the school district to determine if there should be an adjustment to the amount issued. The instructions that will be provided to the school will indicate to the school that they should report the student learning style for the majority of the month. Majority of the month is being determined to be 12 or more days.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

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

1. The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- 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]

Montana is not including this in the current PEBT plan. We are still discussing this and if it is determined that we will include them Montana will submit an amended plan for childcare.

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]

Montana is structuring this program in a way that is easy for the school districts to handle required data reporting and ensuring clear and understandable communication to clients and stakeholders. HCSD and OPI will be providing the schools and stakeholders detailed instructions on how to compile the needed data for our school children that would be

eligible for P-EBT benefits. Changes to this data will be reported by the school every two months.

Using simplified assumptions Montana proposes two rates of benefits for these children. All children that are going to school 100% remote would be eligible for the full amount. Fully remote students will be issued benefits based on 5 school days a week and 4 weeks a month. The benefit amount will be \$136.40 monthly.

The children that are hybrid would be eligible to receive a prorated amount of benefits for each month they are hybrid. We would re-evaluate their status every month and issue bi-monthly benefits. This determination will be based on a poll of the 15 highest enrollment school districts in Montana (which accounts for more than 40% of the total statewide population). For these school districts with a hybrid model, we will average the number of days per month students attend school remotely. The average number of days per month will be multiplied by the daily rate of \$6.82 to determine a monthly rate for all hybrid school districts statewide.

For example, Of the 15 largest schools only 4 had a hybrid approach in September. The number of days they (*school districts*) were doing school remotely for September varied between 8-12 days *for the* month. The average number of days was 10 days. Montana would use the simplified assumption that all hybrid children would be eligible to receive \$6.82 for 10 days of the month. This would be a partial grant of \$68.20 for hybrid students. This will be the amount of benefits Montana will provide for hybrid students for October-January. Montana will ask schools to report how many days a week they were in a hybrid learning style as of February 1, 2021. With this update we will determine if a new hybrid amount needs to be issued due to the reduction in hybrid or if the 10 days currently being issues is still the average statewide. This new hybrid amount will apply for the months of February through May.

School districts will be asked to report any changes in a child's attendance or learning style for each month. This amount would be issued for all months that a child is in hybrid model or until such time as the school/student returns to an in-person model. Schools will also be asked to report if they are no longer offering a hybrid approach.

Montana will also have dedicated staff that will be reviewing the information to ensure we have complete information to issue benefits. If there is something missing the staff will be reaching out to the schools to assist in gathering the needed information.

Montana calculated their full benefit amount to be \$115.94. This calculation was done by taking 180 days in the school year, minus 30 days as Montana has already issued benefits for August and September. This left there to be 150 school days left in the school year. 150 day divided by 9 months is 17 days of school a month. The fully remote benefit amount will be 17 days x \$6.82/day= \$115.94. This allows Montana to issue one consistent benefit amount of \$115.94 per month. This is less confusing for households and should help with phone and email inquiries to HCSD and OPI's staff.

Montana will issue benefits retrospectively to account for the fluid nature of the pandemic and the ever-changing needs of students and school districts. This approach is easier for OPI to provide instructions to school districts for reporting purposes and allows for easier explanations to families about the benefit amount they received and when they can expect them. Montana will also provide families with an approval letter that will outline what they received, why, how much, and when to expect the next issuance. This approach will cut down on the number of questions about when/if more benefits should be expected and in what amount.

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]

Once Montana has a master list of students from the school districts, we plan to start issuing benefits within 30 days of FNS approval of our P-EBT plan. We will initially issue benefits for October and November 2020, followed by subsequent issuances on at least a bi-monthly basis, with all benefits being issued by June 30, 2021. By issuing retroactively with a master list from school districts we can process any reported changes before the next issuance. These issuance dates will depend on the plan approval date. We may need to adjust the schedule but anticipate that it won't be a significant delay. *P-EBT benefits will be issued in the same fashion as previous instances and will be noted to be P-EBT benefits in the issuance file. Solutran already has this set up in their system from earlier and will utilize the same information. Montana has also confirmed that Solutran has enough card stock to issue this round of benefits. Montana will follow the same expungement process for P-EBT benefits as it is for SNAP benefits.*

Before Day 0 - During the process of waiting for approved conversations have been happening with OPI and stakeholders so that we are ready to start communicating with schools and collecting data. These conversations are helping with educating the school districts with what is needed from them and how the data will be collected. These conversations are helping to address lessons learned from the first two rounds and ensure accurate and consistent messages. *Montana has worked with Solutran and Deloitte on our timeline. They are aware of what is going on and are prepared to meet our timelines. We have met with them several times to work out all the details.*

Day 0--Plan is approved

Day 1--Notify OPI, Stakeholders, *Solutran, Deloitte*, and staff that this plan has been approved.

Day 1 – Formal Notification to School Districts of P-EBT including required data to submit and timelines

Day 10 – Onboard and train staff that will be responsible for collecting and reviewing data from school districts, following up with school districts, and handling phone calls and emails from the public and the school districts on P-EBT

Day 20--Data will be due from the schools to HCSD

Day 27---Data will be submitted to eligibility vendor for review and load into system

Day 30--Issue benefits for October-November 2020 P-EBT benefits

Day 31-June 30 – additional rounds of data collection from school districts to support bi-monthly issuance of P-EBT benefits

Note: These dates could change based on weekends and holiday schedules.

New P-EBT cards will be issued to all P-EBT eligible households, these cards will be our standard issued SNAP EBT cards. After the initial card is issued, all future benefits will be added to the new card they receive. SNAP P-EBT eligible households will receive their P-EBT benefits on their existing EBT card. After considering all the options this method is the best approach so that we ensure that the family receives their benefits timely. Montana will issue these benefits in a staggered approach using the last digit of the case number to issue benefits. After issuance if a family needs to have their card replaced due to it being lost or damaged, Montana’s HCSD has designated an email address for those requests. *Once we receive a request a for a new card one will be issued to the family. We will verify the mailing address to ensure it goes to the right place.* Montana will continue to use the current code set up with our vendor Solutran to track P-EBT benefits deposits. Montana will continue the current process of drawing P-EBT funds before D-SNAP or regular SNAP benefits. Undeliverable cards will be returned to Solutran who will provide Montana the information on the returned cards. We will share this information with OPI to work to get the card to the family. This process will be covered in the “Customer Service” section.

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]

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. We will track the disputes on a spreadsheet to ensure that whatever caused the issuance error (i.e.: incorrect address) is corrected for the next issuance. Montana will reach out to the client once a determination is made to let them know the outcome. There will be a team of staff dedicated strictly to the P-EBT program. The team will work with OPI and school districts to resolve returned cards due to incorrect mailing addresses, request new cards for client and help them with getting a card activated if they have an issue. *Montana is working with the schools and issuing benefits retroactively to ensure all students that are eligible receive the benefits. Montana will be sending correspondence to all families and working with schools to let them know the details of the program. School's along with OPI will have the same information for the most common questions families ask. Montana is committed to equal access for all families regardless of their circumstance. Montana will work OPI, school districts, and families, if needed, to ensure that all eligible students receive the benefits. Montana will work with schools and OPI to get cards to households that don't have permanent addresses. Montana will coordinate with the family a pickup spot: either at the school or local office of Public Assistance to get the card. If the family has an address the card can be sent to it will be mailed there as well. The returned*

cards are sent back to our EBT Vendor. The vendor will be sending return card lists so that we can get the addresses updated and sent back to the family. We will work with the school districts to get updated address for the families.

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

If a client states they should have received benefits, HCSD will work with OPI and the school district to research the situation and decide. The household will then be notified of the outcome of the research and what determination was made.

We will work with our EBT vendor to ensure that the IVR prompt provides information around the P-EBT program and who they need to contact to update an address or request a new card. *This number (1-866-850-1556) is the EBT Vendor number. We will also have a line on our Public Assistance Help Line dedicated to this as well. All of this information is listed below.*

If a family received a card but does not want to keep the benefits they will be instructed that they can destroy the card or they can mail it back to our Central office with a note and we will destroy the card for them. The benefits will then be expunged using the normal SNAP expungement process.

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 the Montana Food Bank Network and other entities to do a general information campaign for families to know about the program. This campaign will provide basic information around the program, eligibility and who to contact if they have not received benefits and might qualify.*

We will also send a letter to all households that receive the benefits that will notify them of how to activate the card, eligible items to be purchased, how to use the card, contact information for questions. *A notice will be sent prior to the card being received, to all eligible P-EBT households. This correspondence will let the household know:*

- A description of P-EBT*
- Explanation of how to PIN the card, using their oldest school aged child's DOB*
- An explanation of the benefits and where they can be used.*
- Contact information for any questions or concerns: (888)706-1535 option 1 or email at HSHCSDEBT@mt.gov The email will be monitored by HCSD staff.*
- Information regarding the BNFT app they can put on their phone to access balances, activate card, order a new card, eligible food purchased, etc...*
- An explanation of all the penalties and violations will be included in the notice, along with a reminder that these benefits are non-transferable.*

When they receive the card they also receive another correspondence that talks about eligible foods, where the card can be used, etc.

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]

Montana does not anticipate over-issuance being problematic. Because Montana is issuing benefits retroactively each month, Montana is confident that changes in attendance at the school level or child level will be acknowledged by OPI prior to the file sharing with HCSD, therefore, limiting any incorrect issuance of P-EBT benefits. HCSD and OPI has had direct communication with the school districts to ensure every attempt is made to update student demographic and attendance information. Should an error be discovered after issuance has been completed, OPI and HCSD will work collaboratively to pursue a repayment of the incorrectly issued P-EBT amount. Repayment of the incorrectly issued amount will not occur out of a SNAP household's SNAP benefits. Since P-EBT issuance will not be tracked in HCSD's eligibility system, any over issued or incorrectly issued benefit and repayment will be tracked independently using a manual process and excel file mechanism.

10. Benefit Issuance Reporting

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

11. Administrative Funding

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

SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

12. Release of Information

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

13. Civil Rights Statement

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

14. Administration of State P-EBT Plan

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

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

Justine Welker

Signature
Print Name and Title

Christine Emerson

Signature
Print Name and Title

Date of Request: March 16, 2021