State Plan for Pandemic EBT

Summer 2023

February 16, 2023

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Summary:	 (1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 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. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328). 	
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: <u>https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt</u>

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

State Plan for Pandemic EBT Summer 2023¹ February 16, 2023

Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 without a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.

1. State: <u>American Samoa</u>

2. Primary Citation: Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

- **a.** Estimated total amount of P-EBT benefits the state will issue to school children within this amendment's date range.² (Consult the appropriate table in Section 4, "Benefit Levels.")
- **b.** Estimated total number of school children to which the state will issue P-EBT benefits.
- c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Assuming that the public health emergency ends on May 11 as anticipated, P-EBT funds will not be available beyond the end of fiscal year 2023. As a result, states must issue all P-EBT benefits by September 30, 2023. This applies to P-EBT benefits for school year 2022-2023 and summer 2023. Benefits issued by the states for the summer and school year after this date may result in liability to the state.
- **d.** Names of state agencies involved in administering this plan.

Response: American Samoa's Summer 2023 P-EBT application is submitted as a collaborative effort between the American Samoa Department of Education (ASDOE) and the Department of Human and Social Services (DHSS) American Samoa Nutrition Assistance Program (ASNAP). Before this State Plan, these entities were able to secure FNS approvals for P-EBT for the 2020-2021 and 2021-2022 school years, as well as Summer P-EBT for 2021 and 2022. And it is this experience that we will employ for this State Plan

¹ Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

² The Biden Administration recently announced that, at present, it intends to end the COVID-19 public health emergency declaration on May 11, 2023. In the event that the public health emergency does end on May 11, prior to the start of P-EBT's covered summer period, states may not issue P-EBT summer benefits to children in child care in 2023.

whereby the ASNAP will be responsible for administering the Summer 2023 P-EBT program itself and the ASDOE is responsible for verifying qualifying students in both public and private school settings.

Since American Samoa does not have EBT capabilities at this time, Summer P-EBT benefits will continue to be issued in the form of food coupons. More details are outlined under #6, Months 2-4.

The ASNAP office elects to use the \$139 rate specified for Hawaii and the U.S. Territories for the Summer of 2023. Based on that rate of \$139 per child multiplied by the projected 14,050 school children that we expect to serve, the estimated total that American Samoa will issue in Summer 2023 P-EBT benefits is \$1,952,950 starting August 2023.

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced-price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced-priced school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

• Describe how the state will ensure that households with children eligible for free or reduced-price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023.

Response: All schools in American Samoa are NSLP-participating schools and the School Lunch Program (SLP), which is administered by ASDOE, automatically qualifies all children for free meals upon registering and attending a public or private school. All school-aged children who are verified through the official enrollment list provided by ASDOE consist only of children who attended during the last month of SY 2022-2023.

5. Benefit Levels

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

Summer 2023 P-EBT Benefit		
Contiguous U.S.	\$120	
Alaska	188	
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139	

6. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 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.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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 P-EBT issuances for previous school years. 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.
- 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: If approved, the ASNAP will implement the following tentative timeline for 14,050 school-aged children, as verified by ASDOE. Our timeline is based on the premise that FNS approves American Samoa's Summer 2023 P-EBT Plan on June 30, 2023, with implementation activities to start immediately thereafter.

- June 30, 2023: FNS approval is confirmed for American Samoa to issue Summer 2023 P-EBT benefits for qualifying students.
- Week 1: July 3 7, 2023
 - An official press release, prepared by DHSS and ASDOE, is issued by the Office of the Governor informing parents of the availability of Summer 2023 P-EBT benefits, as approved by FNS. This press release is immediately shared on various social media platforms by the ASNAP and all other DHSS Divisions, which also triggers the start of American Samoa's Summer P-EBT public information campaign. This campaign shares information about who qualifies to register and how to go about doing so to receive Summer P-EBT for each qualifying child, important dates such as when the online portal will go live for registrations, the last day to register, the expiration date of Summer P-EBT coupons, and the last day for authorized ASNAP retailers to redeem the coupons with the redemption agent (the Territorial Bank of American Samoa). We also use television and print media and we translate this information into Samoan to expand the reach of this information.
 - Meet with ASDOE, MIS Contractors, and other stakeholders to reaffirm next steps for implementation.
 - \circ Order special coupon paper for the issuance of benefits.
 - Inform food wholesalers and authorized ASNAP retailers of the impending increase in the demand for food products because of the release of Summer P-EBT benefits.
- Week 2: July 10 14, 2023
 - Set up accounts with the Department of Treasury once the Notice of Award is received and the FNS Grant Cooperative Agreement has been signed.
 - $\circ~$ Reaffirm accounts with the bank that were previously used for Summer P-EBT.

- Launch the online Summer 2023 P-EBT portal which will enable parents to register their children.
- Week 3: July 17 21, 2023
 - The ASNAP will begin accepting qualifying parents to have their Summer P-EBT photo identification cards issued. Parents whose child(ren) had previously received P-EBT benefits will have this card already. Those who may have lost that card can request a replacement card at no cost.
- Week 4: July 24 28, 2023
 - Start management evaluation client file reviews to ensure the child and parent information correlates to the records from ASDOE, and that the benefit amount is correct for households with multiple qualifying children.
- Months 2 3 (August September 2023)
 - Summer P-EBT benefits will be issued in alphabetical order, as scheduled by the ASNAP, starting Tuesday, August 15th through Friday, September 29th, 2023.
 - Summer P-EBT benefits will be issued in the form of food coupons since we do not have EBT capabilities at this time.
 - Summer P-EBT benefits coupons will have the name "Summer P-EBT" printed on them with the Summer P-EBT account number at the bottom to differentiate them from the ASNAP and ARPA Enhanced Nutrition Assistance Benefits that are currently being issued also. The color of the Summer P-EBT food coupons are also different in color from the ASNAP and ARPA ENAB food coupons currently being issued by the ASNAP office. These coupons also bear the Summer P-EBT account number at the bottom.
 - All coupons will be issued from the main ASNAP office and will be released only to authorized representatives with Summer P-EBT identification cards. These identification cards were created for P-EBT, which has this acronym printed on the card, distinguishing it from a SNAP benefits card. Parents whose child is qualifying for the first time will be issued a P-EBT benefits card at no cost. Parents whose child(ren) previously received P-EBT benefits will have this card already, while those who may have lost that card can request a replacement at no cost.
 - Last day/deadline to register is Friday, September 15, 2023.
 - Final issuance date is Friday, September 29, 2023.
 - Fourth quarter financial reports are due to FNS by September 30, 2023.
- Month 6 (December 2023)
 - \circ $\;$ The final program and financial reports are due to FNS.
- Additional information:
 - The ASNAP will make the Summer P-EBT a top priority for draws/spending.
 - The ASNAP does not apply the expungement rules to NAP benefits, instead implements the expired rule since we issue benefits in the form of food coupons.

- **Month 7** (January 2024)
 - Expiration date of Summer 2023 P-EBT benefits is Wednesday, January 31, 2024.
- **Month 8** (February 2024):
 - A 10-day grace period is given to authorized ASNAP retailers to redeem their coupons with the redemption agent (Territorial Bank of American Samoa), ending Saturday, February 10, 2024.
- Month 9 (March 2024):
 - The Revised Final Financial Reports are due to FNS.

7. Customer Service

To complete Section 7, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

• 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.

Response: American Samoa will issue Summer P-EBT benefits in the form of food coupons. As such, we will not deal with outside EBT processors as we will conduct our issuance in-house out of one location. To resolve disputes or issuance errors Authorized Representatives (ARs) will have two options: 1) Call the Summer P-EBT Warm Line that will be manned by an eligibility worker with access to our Food Assistance Delivery System (FADS) and will be able to immediately research and assist, or 2) Visit the ASNAP office in person to see an eligibility worker who will be able to immediately research and assist.

• 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.

Response: The ASNAP stands ready to assist any parents/ groups that may have potential access challenges, such as English proficiency, households without internet access, those who are not technically inclined to navigate the online portal, people living with disabilities, etc.

For example, parents can call our Summer P-EBT Warm Line and we walk them through registering via the portal or they have the option of coming to see members of our staff to help them register through the online portal. For children who do not have a social security number, a temporary unique identification number will be assigned to them by the ASNAP. Registrations for children in shelters for the homeless and victims of crime will be completed by their legal guardians or an authorized Child Protective Services

representative can register children who are wards of the State. Similarly, foster parents can register children in their care.

Individuals with disabilities will be provided appropriate accommodations when coming to the ASNAP office. We can also assist with facilitating transportation to and from the ASNAP office through the Dial-A-Ride Program and wheelchair assistance while they are at the ASNAP office. Individuals with access and functional needs can designate an AR to register, pick up and redeem benefits. For more information about how we can help, everyone is encouraged to call our Summer P-EBT Warm Line.

• 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).

Response: American Samoa's Summer P-EBT public information campaign will provide program details, such as who is eligible, program benefits, where to register, registration deadlines, program duration, and contact numbers for additional information. This public information campaign is triggered by the issuance of an official press release by the Office of the Governor that is prepared by ASDOE and DHSS. This press release is disseminated to all media outlets (print, television, radio, and social media). Additionally, the ASNAP participates in live interviews on television and radio and issues public service announcements across all available platforms. Also important is that our public information campaign will be implemented in both the English and Samoan languages to further expand the reach of our message.

• Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.

Response: Part of our public information campaign will remind parents that they do not have to register for Summer P-EBT if they do not want the benefits. For parents/ARs who register and receive Summer P-EBT benefits but later decide they no longer want the benefits, they will be advised to return the food coupons to the ASNAP office where they will be canceled and destroyed by Summer P-EBT staff according to ASNAP regulations.

- 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: When the ARs come in to take ID photos and pick up their identification cards, they will be provided a complete orientation regarding the Summer P-EBT program rules and regulations covering the following: 1) Description of Summer P-EBT; 2) Showing their Summer P-EBT ID cards to redeem food coupons at any authorized ASNAP retailer; 3) List of authorized retailers where food coupons can be used; 4) Explanation of how benefits can and cannot be used; 5) Violations and penalties; 6) Instructions on what to do if they do not want the benefits; and 7) Information on the warm line for assistance, if needed.

Information will be provided to both non-NAP and NAP participants/applicants through public service announcements on television, radio, and social media.

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.

Response: American Samoa will issue Summer P-EBT benefits in the form of food coupons. As such, we will not deal with outside EBT processors as we will conduct our issuance inhouse out of one location. To resolve disputes or issuance errors ARs will have two options: 1) Call the Summer P-EBT Warm Line that will be manned by an eligibility worker with access to FADS and will be able to immediately research and assist, or 2) Visit the ASNAP office in person to see an eligibility worker who will be able to immediately research and assist.

• 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.

Response: The ASNAP stands ready to assist any parents/ groups that may have potential access challenges, such as English proficiency, households without internet access, those who are not technically inclined to navigate the online portal, people living with disabilities, etc.

For example, parents can call our Summer P-EBT Warm Line and we walk them through registering via the portal or they have the option of coming to see members of our staff to help them register through the online portal. For children who do not have a social security number, a temporary unique identification number will be assigned to them by the ASNAP. Registrations for children in shelters for the homeless and victims of crime will be completed by their legal guardians or an authorized Child Protective Services representative can register children who are wards of the State. Similarly, foster parents can register children in their care.

Individuals with disabilities will be provided appropriate accommodations when coming to the ASNAP office. We can also assist with facilitating transportation to and from the ASNAP office through the Dial-A-Ride Program and wheelchair assistance while they are at the ASNAP office. Individuals with access and functional needs can designate an AR to register, pick up and redeem benefits. For more information about how we can help, everyone is encouraged to call our Summer P-EBT Warm Line.

• 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).

Response: An official press release, prepared by DHSS and ASDOE, is issued by the Office of the Governor informing parents of the availability of Summer 2023 P-EBT benefits, as approved by FNS. It also shares information about who qualifies to register and how to go about doing so to receive Summer P-EBT for each qualifying child, important dates such as when the online portal will go live for registrations, the last day to register, the expiration date of Summer P-EBT coupons, and the last day for authorized ASNAP retailers to redeem the coupons with the redemption agent (the Territorial Bank of American Samoa). This press release is immediately shared on various social media platforms by the ASNAP and all other DHSS Divisions. We also use television and print media and we translate this information into Samoan to expand the reach of this information.

Parents who do not want P-EBT benefits will be advised not to register and those with identification cards from preceding P-EBT issuances are asked to turn in their cards to the ASNAP office.

8. Over-issuance of P-EBT benefits

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

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: Every child who was registered for public or private schools in American Samoa for SY2022-2023 qualifies for the National School Lunch Program and therefore qualifies for Summer P-EBT benefits. American Samoa elects to use the \$139 rate specified for Hawaii and the U.S. Territories for the Summer of 2023, which is the period covered by this State Plan. Moreover, to qualify for Summer P-EBT benefits, parents and legal guardians of all school children are required to register online to receive their one-time issuance of \$139 for each qualifying student.

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. 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 10 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 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.

In closing, we confirm and approve that American Samoa will:

- issue the U.S. standard benefit of \$139 to all eligible school children,
- set a registration deadline of September 15, 2023, by which households will need to register in order for the eligible child to receive Summer 2023 P-EBT benefits,
 - American Samoa will communicate this information to families in their Summer P-EBT public information campaign,
- tentatively issue a single benefit for the entire summer period starting Tuesday, August 15 through Friday, September 29, 2023.

13. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:

Signature Dr. Teresa Leiato Atuatasi, Acting Director American Samoa Department of Education

Signature Muavaefa'atasi John E. Suisala, Director American Samoa Department of Human and Social Services

Date of Request: 5/24/2023