

**State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022**

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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) 2021-2022. (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:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

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

State Plan for Pandemic EBT

Children in School and Child Care, 2021-2022

1. **State:** [American Samoa](#)

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).

Response: On Monday, February 21, 2022, American Samoa Governor Lemanu P.S. Mauga, escalated American Samoa's color-coded risk system to the highest risk level of Code Red effective midnight February 22, 2022, with confirmation of the first community spread of the coronavirus in the territory. In accordance with the Declaration of Ongoing Public Health Emergency and State of Emergency, dated February 4, 2022, Code Red calls for a territory-wide lockdown and orders for the closure of all public and private secondary and elementary schools including Early Childhood Education (ECE). As such, the American Samoa Department of Education (ASDOE) immediately implemented their Remote Learning Plan to ensure continuous instructions while maintaining the health and safety of all students. Moreover, the ASDOE announced the suspension of the distribution of school meals due to Code Red restrictions. Given the above, American Samoa is submitting the following P-EBT State Plan for School Year 2021-2022 that covers the period from February 22, 2022, to June 10, 2022, when NAP and non-NAP school-age children temporarily lost access to free meals at schools because of the following reasons:

- Closure of public and private elementary and secondary schools including ECE due to Code Red restrictions as outlined in the American Samoa Declaration of Ongoing Public Health Emergency and State of Emergency.
- The ASDOE and/or private schools, direct public and private school students to stay home for a COVID-related reason or out of concern about COVID-19.
- The ASDOE, or the American Samoa Department of Health, or a private school, directs the mandatory quarantine or isolation of a student, group of students, a classroom, or a school including ECE for a COVID-related reason or acting out of concern about COVID-19.
- The American Samoa Declaration of Ongoing Public Health Emergency and State of Emergency orders mandatory quarantine or isolation of a student, group of students, a classroom, or a school including ECE for a COVID-related reason or acting out of concern about COVID-19; and/or

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 2021 through June 2022, for example).

- Any absences by a public or private school student, including children in ECE that were initiated by a parent and recognized as COVID-related by ASDOE or private school officials including ECE.

If the schools remain closed for the remaining 76 days of the school year, American Samoa will calculate benefit amounts at \$8.28 per day for each of the 76 days. However, if the schools reopen and any one of the remaining qualifying criteria activates, we will also calculate benefits based on the number of days the students were absent at the rate of \$8.28 per day. At present, there are 304 school-aged children receiving NAP benefits, and 13,746 school-aged children enrolled in school for School Year 2021-2022 who are not receiving NAP benefits.

- a. The **date range** covered by this State plan or amendment
- for children in school
 - for children in child care

Response: American Samoa’s P-EBT State Plan covers the period from February 22, 2022, to June 10, 2022.

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

Response: American Samoa will issue within this plan date range the following estimated amounts:

Estimated Amount to be Issued	Total
Public/private school closure for the remaining 76 days of SY2021-2022 from February 22 to June 10, 2022. 76 days x \$8.28 per day = \$629.28 x 304 NAP students	\$191,301
Public/private school closure for the remaining 76 days of SY2021-2022 from February 22 to June 10, 2022. 76 days x \$8.28 per day = \$629.28 x 13,746 non-NAP students	\$8,650,083
The estimated cost of American Samoa P-EBT for February to June 2022	\$8,841,384

- 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

Response:

- Estimated number of school-aged children receiving NAP: 304
- Estimated number of school-aged children not receiving NAP: 13,746

- d. 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: If approved, American Samoa plans on conducting a one-time issuance of P-EBT benefits in July 2022 when we can calculate the total number of days that the students lost access to free meals at schools provided by the National School Lunch Program, between February 22, 2022, and June 10, 2022.

4. P-EBT for School Children (see Q&As #6-24) 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. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. *(Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.)*

Response: The American Samoa School Lunch Program (SLP) automatically qualifies all children for free meals once they register for school in either public or private schools. Thus, all school-aged children who apply and are verified through the list of children from ASDOE who registered in a public or private school during SY 2021-2022 will also automatically qualify for P-EBT benefits.

To identify school children who are eligible for P-EBT, the DHSS and ASDOE will renew their Memorandum of Understanding (MOU) for data exchange to allow each department to exchange student data for this purpose. One of these datasets is the monthly listing of all school children who were enrolled in public and private schools during SY 2021-2022 and qualified for free SLP meals.

Since this list will not include SY 2020-2021 graduates and other non-students, it will also be used as a measure to prevent the issuance of benefits to ineligible children.

- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals²? 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.

Response: As noted above, the American Samoa SLP automatically qualifies all children for free meals once they register in either public or private schools. For NAP recipient children, their names would be verified against the ASDOE list of school children who were enrolled during the SY 2021-2022 to determine/ confirm their eligibility for free meals. For non-NAP, the same process applies. To participate in P-EBT, parents/ legal guardians who did not participate in the SY 2020-2021 P-EBT will be required to upload relevant information using the P-EBT online portal. This is necessary to create a case file in the ASNAP eligibility system (FADS) to generate and issue benefits. Once the information is received and processed, their child/rens names will be verified against the ASDOE list of enrolled school children to determine/ confirm their eligibility. Parents/ legal guardians who participated in the SY 2020-2021 P-EBT do not need to provide information as they already have case files in FADS to generate and issue benefits for SY 2021-2022.

- 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.

Response: The confirmed student registration list from the ASDOE will be used to determine and verify students who temporarily lost access to meals at school during this period. This is the same process that will be used for children in public and private 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.).

Response: Please refer to the response above.

- 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).

Response: The ASDOE and DHSS will renew their MOU for data exchange to allow each department to exchange student data to facilitate and coordinate the implementation and operation of P-EBT. The MOU includes roles and responsibilities for each agency. The following describes the roles and responsibilities of the ASDOE and DHSS (ASNAP):

ASDOE will be responsible for:

- Providing monthly updated student enrollment lists from public and private schools to the ASNAP. The list will include the full name of the student, date of birth, gender, school name, grade level,

² The burden associated with National School Lunch Program applications is covered under OMB Control # 05840026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

and name of parent/ legal guardian. The list will only include data for SY 2021-2022 and separated by public and private schools;

- Providing monthly updates of the status of every student included in the original list;
- Informing ASNAP of the number of days of school closures by qualifying criteria listed in the Executive Narrative above to determine the total number of days that school children are eligible for P-EBT each month and with a final report at the end of the school year;
- Informing the ASNAP of any changes in the school year that would affect the issuance of benefits;
- Provide student enrollment verification from Student Services for both public and private schools, including ECE, for students with missing information in the data transmitted by the Integrated Data Services Division (e.g., missing parent/ legal guardian names).

DHSS-ASNAP will be responsible for:

- Managing the P-EBT program;
 - Working with our contractor to manage the ASNAP eligibility system (FADS) for P-EBT for; 1) import functionality for the ASDOE to transmit the enrollment listing; 2) application creation and eligibility process for new households; 3) updating issuance and reconciliation functionality to handle P-EBT; 4) creating an ID badge for P-EBT Authorized Representatives (AR); and related tasks;
 - Re-activating the P-EBT online portal for parents/ legal guardians who did not participate in SY 2020-2021 P-EBT to provide relevant information to create case files in FADS;
 - Developing outreach and education campaigns to inform parents and members of the community regarding P-EBT and how to receive benefits;
 - Matching the list from ASDOE of children enrolled in public and private schools with NAP recipients to identify children currently receiving NAP benefits who qualify for P-EBT. Similarly, matching the same list with non-NAP children to determine if they qualify for P-EBT;
 - Procuring operational supplies including special coupon paper to print P-EBT benefits because the ASNAP does not have EBT capability at this time;
 - Issuing P-EBT benefits in the form of food coupons for eligible children to their Authorized Representatives (e.g., parents/ legal guardians);
 - Preparing and submitting program and fiscal reports to FNS.
- 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: American Samoa does not propose any simplifying assumptions at this time.

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.

Response: DHSS ASNAP will use the data transmitted by ASDOE to determine school closure, reduction in hours, or reduced attendance due to COVID-19.

- 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?

Response: Please see the response above.

- 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.)

Response: ASDOE will transmit the information electronically monthly to our MIS IT unit who in turn embeds the information in the ASNAP's eligibility system used for P-EBT.

- 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.

Response: Please see the response above.

- 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: American Samoa does not propose any simplifying assumptions at this time.

- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

5. P-EBT for Children in Child Care (see Q&As #25-33)

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.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

Response: Our plan does not cover children in child care at this time.

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

Response: Our plan does not cover children in child care at this time.

- 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 #29)

Response: Our plan does not cover children in child care at this time.

- 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?

Response: Our plan does not cover children in child care at this time.

- 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 PEBT in those areas?

Response: Our plan does not cover children in child care at this time.

- 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.)

Response: Our plan does not cover children in child care at this time.

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

Response: Our plan does not cover children in child care at this time.

- 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).

Response: Our plan does not cover children in child care at this time.

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

Response: American Samoa does not propose any simplifying assumptions at this time.

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 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Program			Daily Total
	Lunch	Breakfast	Snack	
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10

Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

1. Lunch rates include the 7cent 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-2021-07-16/pdf/2021-15107.pdf>

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

Response: Since American Samoa’s P-EBT State Plan covers the period from February 22, 2022, to June 10, 2022, the benefit amounts will be calculated as follows:

Estimated Amount to be Issued	Total
Public/private school closure for the remaining 76 days of SY2021-2022 from February 22 to June 10, 2022. 76 days x \$8.28 per day = \$629.28 x 304 NAP students	\$191,301
Public/private school closure for the remaining 76 days of SY2021-2022 from February 22 to June 10, 2022. 76 days x \$8.28 per day = \$629.28 x 13,746 non-NAP students	\$8,650,083
The estimated cost of American Samoa P-EBT for February to June 2022	\$8,841,384

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2020-2021, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - o State Education agency provides student data to SNAP State agency (Day #5)
 - o P-EBT hotline becomes active (Day #9)
 - o Public notice campaign begins (Day #10), etc.

Proposed Date	Milestones	Responsible Agency
MONTH 1	(If approved by April 2022)	
Weeks 1 - 3	State Plan Approval	FNS
	Issue Press Release regarding the approval of P-EBT State Plan for SY 2021-2022	DHSS
	Meet with partners for data sharing	DHSS-ASNAP/ASDOE
	Consultation with MIS contractor to reactivate online portal; order food coupon paper, MICR toner cartridges, ID cards, datacard ribbons, and other supplies for coupon issuance.	DHSS-ASI
	Inform food wholesalers and authorized retailers to order a sufficient amount of food to cater to P-EBT participants	DHSS-ASNAP
	Set up P-EBT program account with Department of Treasury for FY 2022.	DHSS-ASNAP/Finance/Director's Office
	Work with Office of Procurement to process contracts for redemption agent to redeem P-EBT coupons; MIS contractor to reactivate online portal and manage P-EBT eligibility system, and local radio stations to air public service announcements.	DHSS-ASNAP/Finance/Director's Office
MONTH 2		
Weeks 5-12	(When contracts are fully executed)	
	Media outreach campaign that includes television and radio talk shows, public service announcements on television, radio stations, and social media, and other avenues regarding P-EBT for SY2021-2022.	DHSS-ASNAP
	Accept household information from parents who did not participate in SY 2020-2021 P-EBT through the P-EBT online portal.	DHSS-ASNAP
	Verify student/ AR information using the ASDOE list to identify eligible school-age children.	DHSS-ASNAP
	Match ASDOE list of enrolled school children against FADS to identify those who are receiving NAP benefits.	DHSS-ASNAP
	Start issuing identification cards to ARs of approved cases.	DHSS-ASNAP
	Start conducting ME client file reviews to ensure compliance with program rules.	DHSS-PIT
MONTH 3		
Weeks 9 -12	Finalize calculation of benefit levels based on final data transmission from ASDOE	
MONTHS 4 - 6		
Weeks 13-24	One-time issuance of P-EBT benefits in alphabetical order.	DHSS-ASNAP
MONTH 11		
Weeks 41- 44	30-day grace period for all authorized retailers to redeem food coupons.	DHSS-ASNAP

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?

Response: The ASNAP is issuing NAP benefits in the form of paper coupons. As such, we will also be issuing P-EBT benefits in the form of paper coupons.

- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2020-2021. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.

Response: P-EBT food coupons will bear the name, "Pandemic EBT" to differentiate them from the ASNAP coupons. This will help staff, participants, retailers, restaurants, and the redemption agent (bank) in distinguishing between the two programs. The color of the P-EBT food coupon will also be different from the colors of the ASNAP food coupons that are currently being issued by the ASNAP.

- 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.

Response: If awarded, P-EBT will have its separate account with the American Samoa Department of Treasury, the redemption agent, and the ASNAP for it to be managed separately from the ASNAP account. Approved expenditures for P-EBT and ASNAP will be drawn down separately from the ASAP and reported separated.

- 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 2020-2021, 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: 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. P-EBT benefits will expire on XXX with a 30-day grace period given to retailers and restaurants to redeem coupons with the redemption agent. Any unused coupons by the expiration date will be voided.

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 from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential PEBT 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.

Response: American Samoa will issue 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, ARs will have two options: 1) call the 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: Applicants who do not have internet access will be advised to call the ASNAP office for a staff member to take down the information needed to create a case file in FADS. For children who do not have a social security number, a temporary number will be assigned to them by the ASNAP. Applications for children in shelters for the homeless and victims of crime will be completed by their legal guardians or the Children and Family Services Division of DHSS for children who are wards of the state. Similarly, foster parents will apply for children in foster care. People living with disabilities will be provided appropriate accommodations to provide the information by telephone. Other related services such as transportation to and from the ASNAP office will be provided through the Dial-A-Ride program and wheelchair assistance is also available to them at the ASNAP office. The use of an AR to pick up and redeem benefits is available along with other related services. They may also contact the P-EBT warm line for additional assistance.

- 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 P-EBT outreach and education plan will focus on public education and awareness by providing program details such as who is eligible, program benefits, where to apply,

required documents, program duration, and contact numbers for additional information. The information will be disseminated through an initial press release to all media outlets and followed by flyers/ brochures, infomercials, public service announcements, live interviews on television and radio, and postings on social media. We will also conduct campaign events for ethnic communities and churches/ faith-based organizations.

- 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.

Response: Part of our outreach and education plan is to inform parents that they can opt-out of receiving P-EBT benefits if they do not want the benefits. For parents/ ARs who applied and received P-EBT benefits, they will be advised to return the food coupons to the ASNAP office where they will be canceled and destroyed by 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:
 - o 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)
 - o 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 P-EBT program rules and regulations covering the following: 1) description of P-EBT; 2) showing their 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 (e.g., eligible/ non-eligible items and change-making rules); 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.

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.

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

Response: Eligibility determination and benefit calculations will be done retroactively for all qualified children thus eliminating any errors in benefit calculations. Moreover, to qualify for P-EBT benefits, parents/legal guardians of all school children who did not participate in the SY 2020-2021 P-EBT will be required to provide relevant information through the online portal for determination of eligibility and calculating benefit levels. There will also be a one-time issuance of P-EBT benefits. However, in the event where it might be necessary or appropriate to reclaim mistakenly issued benefits to households such as a duplicate issuance, we will collect from the head of household to recover benefits issued in error. Additionally, American Samoa will contact USDA whenever it identifies an issuance error and will provide a description of the error, the number of children involved, and the value of the over-issuance before taking any further action.

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, 2021 through September 30 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

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 ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing 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:

Signature

TALAUEGA DR. SAMASONI ASAELI, Director
American Samoa Department of Education

Signature

MUAVAEFA'ATASI JOHN E. SUISALA, Director
American Samoa Department of Human and Social Services

Date of Request _____