

**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: MISSISSIPPI

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

3. Executive Summary:

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

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

Proposed date range covered by this plan is August 1, 2021- May 31, 2022. This plan is for children in child care only.

- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
- Estimated amount issued to non-school children in child care

Mississippi estimates 90,000 children will be eligible for at least one monthly benefit of \$33 in the fall semester and/or \$34 in the spring semester [estimated based on analysis of Child and Adult Care Food Program (CACFP) Lunch Claim data through March 2022], multiplied by 10 months of eligibility, for an estimated maximum total issuance of approximately \$335 per eligible child. Not all children will be eligible to receive the benefit in each month. The child must have received SNAP benefits during that month in order to qualify for that month's benefit. Mississippi commits to inform FNS of any significant changes in expected P-EBT benefits issuance following analysis of child care access and benefit amounts for the Spring semester. To date, Mississippi has been able to analyze spring semester data through March 2022. This will result in a total issuance of up to approximately \$30,150,000.

- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
- Estimated number of non-school children in child care

90,000 children under age 6 were enrolled in SNAP between August 1, 2021 and May 15, 2022. Mississippi commits to inform FNS of any significant changes in expected P-EBT benefits issuance. Based on USDA guidance, all children who were under the age of 6 and enrolled in SNAP at some

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).

point during the plan period are considered to be children “in childcare.” Children under 6 in families that did not participate in SNAP during the covered period are not eligible for School Year 2021-22 P-EBT benefits.

- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - Children in child care
 - P-EBT benefits for 2021-22 school year for SNAP Under 6 children are tentatively scheduled for October 2022
 - P-EBT benefits for Summer 2022 for both children in K-12 schools and SNAP Under 6 (if later approved by FNS) will be tentatively scheduled for October 2022

4. P-EBT for School Children (see Q&As #6-24)

A. Eligible Children

Standard for P-EBT Eligibility

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

- The child is a member of a household that is enrolled in SNAP in the benefit month.
- 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.)
- 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.

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

From analysis of the CACFP Lunch Claim data (detailed on pages 6-7), MDE determined that Mississippi’s child care system continues to operate during the Fall 2021 semester at significantly reduced capacity due to the COVID-19 pandemic. The most recently-available data shows a 25.6% reduction in CACFP lunches served between August through December 2021, compared against pre-pandemic levels. Mississippi has also conducted an initial statewide analysis of P-EBT eligibility for Spring semester months of January - March 2022. This analysis shows that there was a 26.3% reduction in CACFP lunches served during this period compared to pre-pandemic levels. Mississippi intends to use this analysis to estimate benefits for the entire spring period of January – May 2022.

Informed by the data that shows reduced child care access, Mississippi proposes to determine all children enrolled in SNAP during the covered period and under age 6 (as of September 1, 2021) eligible for P-EBT child care benefits throughout the state.

Once it has been determined that statewide child care access remains reduced for that semester, Mississippi will identify all children in Mississippi's eligibility system (MAVERICS) who were in a household receiving SNAP benefits during the covered period and under age 6 as of September 1, 2021, and will issue P-EBT benefits to these children. Mississippi proposes that for each month that CACFP data shows an overall reduction in the number of meals served in childcare settings, all children in Mississippi under 6 years of age as of September 1, 2021 who were in a household receiving SNAP benefits during that benefit month will be eligible for the childcare P-EBT benefit for that month.

The September 1, 2021 age cutoff date is in alignment with state regulation that requires children turning age 6 on or before September 1 to attend school. A child who turns 6 after September 1, 2021 will be eligible for P-EBT benefits under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year.

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

MDHS (SNAP agency) will determine P-EBT eligibility using its existing SNAP eligibility system, MAVERICS.

- 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)

Mississippi is not basing SNAP Under 6 eligibility on proximity to area schools in this plan.

- For children whose residence is not in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's 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?

See explanation above.

- 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?

No.

- 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.)

Mississippi anticipates retroactively issuing P-EBT benefits to children eligible under this SNAP Under 6 plan, so no prospective eligibility determinations will be necessary. As stated above, Mississippi proposes to assess historical CACFP lunch data as a proxy for child care access on a semester-long basis.

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

Mississippi proposes to set a standard monthly P-EBT child care benefit for the fall semester at 25.6% of the fully virtual benefit that school age children would be eligible to receive if the state were to issue 2021-22 P-EBT benefits to school age children. Similarly, Mississippi proposes to set a standard monthly P-EBT benefit for the spring semester at 26.3% of the fully virtual benefit that school age children would be eligible to receive if the state were to issue 2021-22 P-EBT benefits to school age children.

Mississippi has a 180 day school calendar requirement, which averages 18 school days per month over ten months. Based on the \$7.10 daily reimbursement rate, the fully virtual benefit amount would be \$127.80 per month. A fall semester benefit at 25.6% of this fully virtual benefit amount equates to \$33 per month, when rounded to the nearest whole dollar. This benefit level is based on MDE's most recent analysis of CACFP data that shows participation is 25.6% below pre-pandemic levels in a year-over-year comparison (2019 vs. 2021) of Fall semester months.

To determine the benefit level for the Spring semester months, MDE compared CACFP lunch data for the months of January - March 2022 to the pre-pandemic months of January - March 2019 and set the benefit in the same manner as described for Fall semester. A spring semester benefit at 26.3% of this fully virtual benefit amount equates to \$34 per month, when rounded to the nearest whole dollar. This benefit level is based on MDE's most recent analysis of CACFP data that shows participation is 26.3% below pre-pandemic levels in a year-over-year comparison (2019 vs. 2021) of spring semester months through March 2022. See pages 6-7 for additional details on this calculation.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

MDHS, with the help of its eligibility system vendor (Conduent), will identify the eligible SNAP Under 6 population based on age requirements and SNAP participation described above, issue benefits to P-EBT cards, and provide information to eligible families. Conduent Call Center staff will help clients resolve disputes regarding P-EBT benefits issued to SNAP Under 6 children. MDE will provide data that the agency submits to FNS on CACFP lunch reimbursement claims and provide calculations regarding the reduction – if any – in meal reimbursements from 2019 to the 2021-22 school year.

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

As stated above, Mississippi proposes three simplifying assumptions.

First, Mississippi proposes the simplifying assumption that a child who turns 6 after September 1, 2021, and who is not enrolled in school at the start of this plan will remain in Child Care for the remainder of the school year.

Second, Mississippi proposes a simplifying assumption to determine all children under age 6 and enrolled in SNAP to be eligible for P-EBT benefits statewide, based on MDE's analysis showing that Mississippi's child care system continues to operate at significantly reduced capacity across the state due to the COVID-19 pandemic.

Third, Mississippi proposes that for each month that CACFP data shows an overall reduction in the number of meals served in childcare settings, all children in Mississippi under 6 years of age as of September 1, 2021 and in a household receiving SNAP benefits during that month of the plan period August 1, 2021 through May 31, 2022 will be eligible for the P-EBT benefit for that month.

MDE is utilizing data that the agency submits to FNS on CACFP. As shown in Table 1 below, the count of lunches served statewide in Fall of 2021 was well below pre-pandemic levels of 2019. This is largely due to child care programs being forced to close in response to the pandemic, as well as concern about the transmissibility of the highly contagious Delta and Omicron variants that began circulating among children not yet eligible for vaccines in Fall 2021. Based on an initial analysis of the first three months of the spring semester, the state finds that a similar reduction in meal availability took place in Spring 2022 when compared to Spring months prior to the pandemic.

Table 1: CACFP Lunches Served - Homes & Centers Excluding At-Risk Center Lunches in Mississippi, 2019 and 2021 Fall Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester:
August 2019	614,536	August 2021	433,030	To be applied to daily rate and number of school instructional days per month.
September 2019	686,853	September 2021	540,006	
October 2019	724,834	October 2021	489,370	
November 2019	611,300	November 2021	466,894	
December 2019	578,702	December 2021	463,037	
Total	3,216,225	Total	2,392,337	

Table 2: CACFP Lunches Served - Homes & Centers Excluding At-Risk Center Lunches in Mississippi, 2019 and 2021 Spring Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Spring Semester: To be applied to daily rate and number of school instructional days per month.
January 2020	716,607	January 2022	455,704	
February 2020	695,812	February 2022	531,595	
March 2019	712,068	March 2022	579,359	
Total	2,124,487	Total	1,566,658	-26.3%

5. Benefit Levels

Standard for Benefit Levels

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 Programs			
	Lunch	Breakfast	Snack	Daily Total
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 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-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.

As noted on page 5, Mississippi proposes to set a standard monthly P-EBT benefit for the Fall 2021 semester months at 25.6% of the fully-virtual benefit that school age children would receive if the state were to issue 2021-22 school year benefits to school age children (set at 18 days = \$127.80 per month). This equates to \$33 per month for each of the Fall semester months. This benefit level is based on MDE's most recent analysis of CACFP data that shows participation 25.6% below pre-pandemic levels throughout Fall semester months (2019 vs. 2021).

Mississippi proposes to set a standard monthly P-EBT benefit for the Spring 2022 semester months at 26.3% of the fully-virtual benefit that school age children would receive if the state were to issue 2021-22 school year benefits to school age children (set at 18 days = \$127.80 per month). This equates to \$34 per month for each of the spring semester months. This benefit level is based on MDE's most recent analysis of CACFP data that shows participation 26.3% below pre-pandemic levels throughout Spring semester months (2019/2020 vs. 2021).

6. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

The below dates are tentative and contingent upon other factors.

- July 2022: Plan Approval
- August/September 2022: MDHS prepares file of eligible children and Conduent prepares to issue benefits
- October 2022: Families of eligible children are issued P-EBT cards to their last known mailing address
- Ongoing: Disputes and issue resolution, including further issuances

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?

All families of eligible children will receive a P-EBT card by mail at their last known address in MAVERICS.

- 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.

MDHS will use a distinct sub-type benefit to systematically distinguish P-EBT benefits issued to families with children in child care from SNAP and DSNAP.

- 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.

As MDHS is using a separate card only containing P-EBT benefits, no priority will be established.

- 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.

All P-EBT benefits will follow the normal expungement processing timeline and will be expunged based on the number of days of inactivity.

- 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?

Benefits will be issued to P-EBT cards for all SNAP Under 6 P-EBT eligible children and mailed to their last known address in MAVERICS as of the data pull date. The state's card processing partner, Conduent, will receive returned mail and log all returned cards. Conduent Call Center staff will help clients correct addresses when possible and issue replacement cards in those 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?

The state will issue a distinctive P-EBT cards to families of eligible SNAP Under 6 children. Families that need to replace a P-EBT card will be able to do so through the state's existing process for EBT card replacement.

7. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages States to provide a means to resolve disputes and answer 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 and caregivers 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 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?

MDHS will partner with Conduent to provide a call center for households with P-EBT questions and concerns. The call center will be open from 8:30am-5:30pm, Monday-Friday. Call center staff will be able to provide information to clients regarding their benefit issuance date and amount, eligibility requirements, and how benefits were calculated. Call center staff will also be able to assist in resolving client concerns. The P-EBT hotline will have agents capable of speaking English, Spanish, and Vietnamese.

Call center staff will receive training on the SNAP Under 6 P-EBT program, thorough scripts, and avenues through which to escalate issues as needed to MDHS staff. Call center staff at the Mississippi EBT call center will also be provided with information regarding P-EBT so that they can adequately answer basic client questions.

A mailer will be included with the P-EBT card mailed to every family with an eligible SNAP Under 6 child. The mailer will describe the purpose of P-EBT, which children were deemed eligible for P-EBT, and how these benefits can be used. Mailers will include information in both Spanish and Vietnamese and will include the P-EBT hotline number.

MDHS will conduct a public information campaign to alert P-EBT recipients of the purpose of P-EBT and how it is to be used. The public information campaign will include press releases and social media sources including agency websites, Facebook, Twitter, and Instagram. The information outlined will include:

- the P-EBT call center number
- how eligibility was determined.
- a projected issuance schedule
- how to decline use of P-EBT benefits, and
- how benefits can and cannot be used, including that benefits cannot be transferred

All information will be provided via mailer issued to the household and/or on the MDHS website, so the information will be available to all eligible households.

8. 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.

MDHS anticipates having a low number of over issuances due to the following aspects of the plan:

- Benefits will be issued retroactively
- Thorough data quality checks prior to issuance.

Mississippi will make all reasonable efforts to deter overissuances and improper payments. These efforts will include utilizing established methods and channels to receive tips, complaints, and referrals regarding P-EBT activity.

Claims will be established for overissuances due to suspected fraud or trafficking, in the amount of \$125 and over, per policies and procedures that will mirror SNAP policies and procedures.

Claims will not be established for administrative errors or for overissuances due to reasons other than fraud or trafficking.

Mississippi will maintain a log of reported overpayment or underpayment errors. The state will review each report and make a concerted effort to correct administrative errors resulting in improper benefit issuance such as an eligible child who did NOT receive benefits or was underpaid.

Clients will be advised that MDHS shall not use current SNAP benefits to settle or repay a P-EBT claim.

Before taking any action to recover issued benefits from any household or reducing any household's future benefits, Mississippi will contact USDA whenever they identify an issuance error and provide a description of the error, the number of children involved, and the value of the overissuance.

9. Benefit Issuance Reporting

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

10. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

11. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B.

Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

12. Civil Rights Statement

The State will continue to comply with civil rights requirements 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.

13. Administration of State P-EBT Plan

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

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

DocuSigned by:
Dr. Kim Benton
D32FF98AE344442...
Signature
Dr. Kim Benton
Mississippi Department of Education

DocuSigned by:
Robert G. Anderson
074E28DE44264B8...
Signature
Mr. Robert G. Anderson, Executive Director
Mississippi Department of Human Services

Date of Request 7/19/22