

**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 Nevada

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

3. Executive Summary:

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

- a. The *date range* covered by this State plan or amendment
- for children in school August 2021 – June 2022
 - for children in childcare as of the caseload statistics ending June 30, 2022, there are 62,407 children that fit the criteria for children in childcare.
- 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.
 - Monthly: \$1,520,603
 - Total: \$13,685,427
 - Estimated amount issued to school children in non-SNAP households
 - Monthly: \$3,384,568
 - Total: \$30,461,112
 - Estimated amount issued to non-school children in childcare
 - Monthly: \$1,704,335.17
 - Total: \$17,043,351.70
- c. Estimated total *number* of children to which the State will issue P-EBT benefits. 77,111
- Estimated number of school children in SNAP households 23,904*
 - Estimated number of school children in non-SNAP households 53,207*
 - * Nevada estimates that approximately 20% of the 385,554 FRL eligible students will be eligible for P-EBT benefits during the 2021-22 SY. Approximately 31% reside in SNAP households and 69% are in non-SNAP households.
 - Estimated number of non-school children in childcare 62,407

- 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 childcare

Tentative issuance schedule for both SNAP and non-SNAP households:

- For school months August 2021- November 2021, September 2022. Issuances will be staggered from the 14-23.
- For school months December 2021 – February 2022, October 2022. Issuances will be staggered from the 14-23.
- For school months March 2022 – June 2022 and data clean up, November 2022. Issuance will be staggered from the 14-23.
- P-EBT benefits for children in childcare will follow the following issuance schedule:
 - For benefit months September 2021-November, September 2022. Issuances will be staggered from the 14-23
 - For benefit months December 2021 – February 2022, October 2022. Issuances will be staggered from the 14-23.
 - For benefit months March 2022 – June 2022, November 2022. Issuance will be staggered from the 14-23

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).

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.*)

Nevada Division of Welfare and Supportive Services (DWSS) administers the SNAP program. The Nevada Department of Agriculture (NDA) administers the National School Lunch Program (NSLP) and Child and Adult Care Food Program (CACFP). The Nevada Department of Education oversees local educational agencies (LEAs) and assists with statewide direct certification match efforts. Nevada has 41 National School Lunch

Program (NSLP) sponsors which is comprised of school districts, Charter schools and Bureau of Indian Education (BIE) authority institutions. As of October 31, 2021, there are approximately 385,554 FRL eligible students in Nevada for SY2021-22. NDE and DWSS have entered into a Data Sharing Agreement for the purpose of identifying and verifying P- EBT eligible students.

NDA will provide DWSS a list of all SY2021-22 NSLP eligible schools including those operating Community Eligibility Provision (CEP) or Provision II status.

Eligible School District/Charter/BIE authorities will communicate directly with parents to identify any children that could be eligible for NSLP and establish eligibility for SY2021-22 as applicable, and request parents to update household information, including their address and primary guardian information on file at their enrolled school.

SY2021-22 NSLP Free and Reduced-Price program eligibility and household contact data is collected and managed by each district/charter/BIE. This includes students who became eligible by application or direct certification during SY2021-22. In June of 2022, every district/charter/BIE authority will provide NDA and NDE with a list of SY2021-22 student eligibility data by school. NDE will consolidate these files, verify eligible schools, and validate student information with NDE Infinite Campus enrollment and FRAM records, and then provide data to DWSS. DWSS will use this data to identify eligible school children and confirm their SY2021-22 NSLP eligibility.

The state will assume free and reduced-price meal eligibility back to the beginning of the 2021-22 SY for children whose applications for free or reduced-price meal eligibility were submitted after the start of the school year.

- 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.
NDA and NDE will work with DWSS to assist with school districts providing the most recent student data and remove students who have graduated or moved out of Nevada school districts. The information will be provided retroactively. All eligible students including those students who became eligible during the school year will be identified.
- 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.

The department will be collecting retroactive student level data for each benefit month.

Nevada will use the simplifying (1) assumption that on the days that a student is absent or excluded for a COVID-related reason, that they will not have access to the meals at school they would have otherwise received.

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.).

Each school district will provide data to NDE regarding NSLP eligible students who have attended school virtually as a result of a COVID-19. This information will be provided retroactively therefore the information will be up to date and not require a reestablishment process. Once NDE has received the information from the schools, the information will be uploaded to the DWSS secure portal.

- 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).

DWSS

- Secure necessary technology for benefit issuance using the eligibility system
- Work with EBT vendor to establish infrastructure for P-EBT issuance and secure necessary EBT contract change request.
 - Responsible for receiving both the original FRL file and updates
- Develop and execute reconsideration process.
- Collaborate with NDE and school districts to gather FRL eligibility and student absences.
- Collaborate with NDA and NDE on process and communications.
- Collaborate with NDA and NDE and the school food authorities to obtain the supporting documentation for reconsideration such as FRL eligibility and qualifying absences.
- Establish, train, and oversee a specialized P-EBT unit.
- Establish the DWSS P-EBT cost plan and request applicable funding from FNS

NDA and/or NDE

- (NDA) Assist with developing and reviewing correspondence that will be sent to non-SNAP eligible households. (NDA) Assist and support school food authorities (SFAs) with appropriate verbiage to use when communicating with non-SNAP eligible households.
- (NDE) Provide FRL eligibility student data for SY 2021-22.
- (NDE) Provide COVID related absences for all FRL students for the SY 2021-22.
- (NDE) Responsible for providing updates with new students, address and district changes.
- (NDA/NDE) Collaborate with DWSS on process and communications.
- (NDA/NDE) Collaborate with DWSS to review data errors and make any necessary corrections.
- (NDE) Responsible for training and communication with schools and school districts in Nevada regarding P-EBT eligibility, issuance, and the reconsideration process.
- (NDA) Responsible for assisting with communications to school food authorities regarding how FRL eligibility is used and gathered.

- 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.

Simplifying Assumption 1: Nevada will use the simplifying assumption that on the days that an NSLP eligible student is absent or excluded for a COVID-related reason, that they will not have access to the meals at school they would have otherwise received.

Simplifying Assumption 2:

For the districts that do not capture specific COVID-19 related absences, Nevada will use the simplifying assumption that if a NSLP eligible student has missed school for 5 or more consecutive days, and it is a school approved excused medical absence, then it will be deemed COVID-19 related. Nevada will issue P-EBT benefits to that student for those absences. Parents/guardians that are deemed to be the primary on record in a student's school's registration system in SY2021-22, will be provided an opportunity to apply for reconsideration of P-EBT benefits for their NSLP eligible child/children as long as primary parent/guardian can provide proof that their child/children's absence, or virtual learning schedule was school approved. The parent/primary guardian, must also attest that the absence or virtual learning schedule was COVID-19 related. A Reconsideration Application will be submitted by the parent and reviewed by DWSS. The Reconsideration Application will provide instructions and information on who to submit the form to, what qualifies as a COVID-19 related absence or virtual learning schedule and will include an attestation from the primary parent/guardian to the accuracy of the information in their request. NDA will be available to discuss a reconsideration application as it applies to information NDA may be able provide.

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

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.

- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?

Based on the clarification provided by FNS, one student absence for 5 or more consecutive days due to a COVID-19 related incident meets the requirement of a school operating at reduced attendance or hours for at least 5 consecutive days.

A survey will be completed by each NSLP participating school. The survey includes the following information:

- Name, title, and contact information of the school personnel completing the survey.
- Name of the school district.
- Name of the school.
- Official start date of SY2021-22.
- A question asking if the school had a COVID related school closure or operated at reduced attendance for 5 or more consecutive days, and the dates of those occurrences.
- A question asking if the school had a least one student that had an approved COVID related absence, for 5 or more consecutive days, the date/s of the first and subsequent occurrences, and the name of the first student who met this threshold.
- A question asking if the school offered COVID related virtual learning for 5 or more consecutive days to at least one student, and the date/s of the first occurrence. By the date of this plan, no school in Nevada has had a COVID related school closure for 2021-22 SY that would meet the threshold of 5 or more consecutive days.

As previously stated, all data will be provided retroactively, schools in each district will be responsible to provide information to NDE through a secure portal.

- 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.)

NDA and NDE will work with DWSS to assist with school districts providing the most recent student data. The information will be provided retroactively so the data will encompass all information for each month of the school year. NDE will collect data from each school district and consolidate it into one file then upload it to the DWSS secure portal. NDA will assist with communicating this information and facilitate distribution of the NDE file with BIE and charter schools and assist with getting the file back to NDE if needed.

- 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. The information will be provided retroactively so the data will encompass all information for each month of the school year. School closure data will be collected by NDE from each school district. The information will be provided retroactively so the data will encompass all information for each month of the school year.
- 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.

Simplifying Assumption 1:

Nevada will use the simplifying assumption that on the days that an NSLP eligible student is absent or excluded for a COVID-related reason, that they will not have access to the meals at school they would have otherwise received.

Simplifying Assumption 2: For the districts that do not capture specific COVID-19 related absences, Nevada will use the simplifying assumption that if a NSLP eligible student has missed school for 5 or more consecutive days, and it is a school approved excused medical absence, then it will be deemed COVID-19 related. Nevada will issue P-EBT benefits to that student for those absences. Parents/guardians that are deemed to be the primary on record in a student's school's registration system in SY2021-22, will be provided an opportunity to apply for reconsideration of P-EBT benefits for their NSLP eligible child/children as long as primary parent/guardian can provide proof that their child/children's absence, or virtual learning schedule was school approved. The parent/primary guardian must also attest that the absence or virtual learning schedule was COVID-19 related. A Reconsideration Application will be submitted by the parent and reviewed by DWSS. The Reconsideration Application will provide instructions and information on who to submit the form to, what qualifies as a COVID-19 related absence or virtual learning schedule and will include an attestation from the primary parent/guardian to the accuracy of the information in their request. NDA will be available to discuss a reconsideration application as it applies to information NDA may be able provide.

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.
 - DWSS, the state agency that administers the SNAP program will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
 - DWSS will query the SNAP database to identify children who are under the age of 6 and received SNAP for the months of September 2021-June 2022. P-EBT eligibility will be determined on a monthly basis. Benefits will only be issued for the months in which the child received SNAP.
- 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)
 - For purposes of this plan, the state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. Nevada is not basing child care eligibility on proximity to area schools in this plan. All eligible childcare aged children will be issued a single statewide benefit for each month of SNAP eligibility in the months of September 2021-June 2022.
- 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 childcare facility is closed or is operating with reduced attendance or hours, or
- the child's childcare facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?

Nevada is not basing child care eligibility on proximity to area schools in this plan.

- Are there any State or local public health ordinances that limit the capacity of childcare facilities in response to COVID-19 in your State?

Nevada is not basing child care eligibility on proximity to area schools in this plan.

If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P- EBT in those areas?

- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the childcare facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

Nevada is not basing child care eligibility on proximity to area schools in this plan.

- 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.)

- The state will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using the following three factors:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months. Based on the guidance provided by FNS, the average is 18 days of virtual instruction per month.
3. The school year 2021-2022 P-EBT benefit per day of \$7.10.

Spring semester benefit:

1. The spring semester benefit will be calculated as above, however, because the finalized CACFP claims data has not been finalized for the month of June 2022, the Spring semester's average will be based on CACFP claims data through May 2022. See Table 2.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months. Based on the guidance provided by FNS, the average is 18 days of virtual instruction per month.

3. The school year 2021-2022 P-EBT benefit per day of \$7.10.

Table 1: Reduction in CACFP lunch claims – fall semester

Fall Semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
September 2019	102,185	September 2021	77,239	
October 2019	112,232	October 2021	78,310	
November 2019	84,512	November 2021	77,882	
December 2019	84,994	December 2021	69,001	
Total	383,923	Total	302,432	-21.2%

Table 2: Reduction in CACFP lunch claims – spring semester

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	103,376	January 2022	64,735	
February 2020	99,373	February 2022	81,236	
March 2019	111,801	March 2022	101,369	
April 2019	110,102	April 2022	87,625	
May 2019	115,840	May 2022	89,537	
June 2019		June 2022		
Total	540,492	Total	424,502	-21.5%

Average monthly P-EBT child care benefit, fall and spring semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit
Fall Semester	21.2%	18	4	\$ 7.10	\$ 27.13
Spring Semester	21.5%	18	6	\$ 7.10	\$ 27.43

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.
 - DWSS, the agency who is confirming eligibility, will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.

Response: [please use as much space as needed]

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 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:

- 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.
- Breakfast rates are those received by "severe need" schools.
- 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: [please use as much space as needed]

Nevada intends to issue benefits to students based on the full daily benefit level for each virtual learning day and COVID-19 related absence. For the districts that cannot capture specific COVID-19 related absences Nevada will apply Simplifying Assumption number 2. Nevada will issue \$7.10 for each day a student has missed a meal due to COVID-19.

Simplifying Assumption 2:

For the districts that do not capture specific COVID-19 related absences, Nevada will use the simplifying assumption that if a NSLP eligible student has missed school for 5 or more consecutive days, and it is a school approved excused medical absence, then it will be deemed COVID-19 related. Nevada will issue P-EBT benefits to that student for those absences. Parents/guardians that are deemed to be the primary on record in a student’s school’s registration system in SY2021-22, will be provided an opportunity to apply for reconsideration of P-EBT benefits for their NSLP eligible child/children as long as primary parent/guardian can provide proof that their child/children’s absence, or virtual learning schedule was school approved. The parent/primary guardian must also and attest that the absence or virtual learning schedule was COVID-19 related. A Reconsideration Application will be submitted by the parent and reviewed by DWSS. The Reconsideration Application will provide instructions and information on who to submit the form to, what qualifies as a COVID-19 related absence or virtual learning schedule and will include an attestation from the primary parent/guardian to the accuracy of the information in their

request. NDA will be available to discuss a reconsideration application as it applies to information NDA may be able provide.

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:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - The initial report with student FRL data from NDE was provided on 2/25/22.
 - The final report encompassing all data from the 2021-22 SY will be provided 60 days prior to the first P-EBT issuance in September 2022.
 - P-EBT hotline becomes active (Day #9)
 - The DWSS P-EBT hotline phone numbers will be activated on 3/31/2022.
 - Public notice campaign begins (Day #10), etc.
 - Communication with the school districts partners has already begun by DWSS, NDA, and NDE. The DWSS website has been updated and will be updated with eligibility information immediately following approval of the P-EBT Plan.
 - P-EBT flyers will be created and shared with the general public.
 - Social media sites will be used to inform the public of any P-EBT related updates.
 - Nevada understands the importance and is committed to providing comprehensive communication. We have established a separate communication plan and committee with the school superintendents to ensure the schools and the parents/guardians are fully and continually provided information about SY2021-22 P-EBT.

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?

Yes. Nevada intends on issuing P-EBT benefits on a unique P-EBT card for those students who are not on an active SNAP/TANF case.

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.

Nevada will continue to use existing FHFKA benefit type 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.

P-EBT will be first in first out.

- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.

Nevada will follow the standard SNAP expungement rules.

- 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?

NDA and NDE will work with DWSS to assist with school districts providing the most recent student data including obtaining the most recent addresses for student's primary guardian for the 2021-22 SY. Any P-EBT card that is returned will be sent to the DWSS Central Office. DWSS has created a specialized DWSS P-EBT unit. Part of their responsibilities include obtaining updated addresses from primary guardians and processing returned mail. Parents/primary guardians also have the ability to update their addresses through the DWSS P-EBT online portal.

- 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?

New P-EBT cards will be issued to students who are not on an active SNAP/TANF case. For students on an active SNAP/TANF case, (for the purposes of the SY2021-22 P-EBT plan, an active SNAP or TANF case, is defined as the current month and prior two months prior to the initial P-EBT issuance date, that date is tentatively September 2022). P-EBT benefits will only be issued to an existing SNAP or TANF case if the SNAP or TANF head of household and the primary guardian on record in the child's school's registration system for SY2021-22 are the same. This would also be true for the parent initiated applications. Nevada will only approve these applications, if the parent/guardian is indicated as the primary, on file in the child's school's registration system for the 2021-22 school year.

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 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.

DWSS has created a P-EBT unit dedicated to resolving disputes and inquiries regarding P-EBT eligibility. Parents will be able to contact this unit through designated phone line and P-EBT email account. The unit will refer unresolved FRL eligibility issues to the appropriate school food authorities. They will process reconsideration applications based on the school approved absence documentation and attestation that the absence was COVID-19 related provided by the parents and communicate benefit issuance dates and benefit levels.

- 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.

Most students have mailing addresses on file at the school. Instances in which DWSS deems the information not to be reliable, DWSS will cross-reference the child's information with our eligibility system. The P-EBT unit will use all of the resources available to obtain accurate and current addresses for those with access problems. Social security numbers will not be used in the processing of P-EBT cases. DWSS will its contract with a language line service to provide access for families with limited English proficiency. Additionally, 30% of the P-EBT staff are bilingual.

- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).

DWSS will work with the school district partners through NDA and NDE to create and promote P-EBT Program information. This information will be distributed to schools, parents/guardians, retailers, and the general public. Information to the general public will include social media posts, press releases, and informational updates on the DWSS website and Access Nevada P-EBT web portal.

- 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.

Parents will be given instructions on how to destroy their P-EBT cards if they decline the benefit.

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:

- What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

For students that are on active SNAP or TANF case, upon the first issuance of the P-EBT benefits, a notice will be generated and mailed to the address provided for the head of household on the SNAP or TANF case. This notice will provide a general explanation of P-EBT eligibility and where P-EBT can be used. It will also provide instructions on how they may qualify for the reconsideration process, and where and how to apply for reconsideration.

- 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?

For students not on an active SNAP case, an informational flyer will be included in the card mailer which will provide a general explanation of P-EBT, eligibility for the program, where P-EBT benefits can be used. It will also provide instructions for setting up their P-EBT card, how to request a new P-EBT card, who to contact for questions, and an explanation of violations and penalties such as trafficking. This will also include explanation that the benefits are nontransferable and instructions for destroying the card and opting out if they decide to decline the benefits. It will also include information on the reconsideration process and how they may qualify.

Response: [please use as much space as 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: [please use as much space as needed]

If DWSS identifies any over-issuances, they will contact USDA FNS prior to taking any action to the case. DWSS will not reclaim any of the P-EBT benefits by reducing a recipient's SNAP benefit. In instances where it is confirmed that a P-EBT benefits were issued on a SNAP case in error due to inaccurate information, DWSS will refer this to the Investigations and Recovery unit.

10. Benefit Issuance Reporting

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

DWSS acknowledges this and will complete all applicable FNS reports.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 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.

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

12. Release of Information

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

13. Civil Rights Statement

The State will continue to comply with civil rights requirements by not discriminating on the 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:



Robert H. Thompson, Administrator
Division of Welfare & Supportive Services
Department of Health and Human Services
State of Nevada

Patricia Hoppe

Digitally signed by Patricia Hoppe
DN: cn=Patricia Hoppe, o=NV Department of
Agriculture, ou=Food & Nutrition Division,
email=pxhoppe@agri.nv.gov, c=US
Date: 2022.07.25 09:48:13 -0700

Signature

Print Name and Title

Patricia Hoppe, Deputy Administrator,
NDA

Date of Request 7/21/2022