

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	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 Child Care 2021-2022

1. **State:** North Dakota

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 child care

North Dakota's Response:

North Dakota plans to issue P-EBT benefits to children of SNAP households in childcare only. The anticipated date range for consideration will be September 1, 2021 through May 31, 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 non-school children in child care, receiving SNAP

North Dakota's Response:

North Dakota estimates 11,942 children in childcare receiving SNAP will be eligible for a \$20 monthly benefit. This is estimated based on analysis of the average Fall and Spring semester months, multiplied by 9 months of eligibility, for an estimated maximum total issuance of approximately \$2,149,560. North Dakota commits to inform FNS of any significant changes in expected P-EBT benefit issuance.

- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
- Estimated number of non-school children in childcare, receiving SNAP

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).

North Dakota’s Response:

11,942 children under age 6, enrolled in SNAP (Estimated number of eligible children from September 1, 2021 through May 31, 2022). North Dakota commits to inform FNS of any significant changes in expected P-EBT benefit issuance.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan.

North Dakota’s Response:

North Dakota anticipates the total amount of administrative funds needed to complete the work described in this P-EBT Plan to be \$17,569.60. North Dakota will inform FNS of any significant changes in anticipated P-EBT administrative costs.

- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - Children in child care

North Dakota’s Response:

North Dakota anticipates to issue P-EBT benefits to children in childcare, under the age of 6 receiving SNAP benefits on the following schedule:

- P-EBT benefits from September 1, 2021 – May 31, 2022 are tentatively scheduled to be issued as a lump-sum payment no later than July 18, 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.*)
- 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.
- 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.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

North Dakota’s Response:

North Dakota is not submitting a P-EBT Plan for school age children.

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.

² The 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.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State’s schools.
- How will the State confirm that the child’s school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State’s plan for monitoring changes in eligible school status between the State’s bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

North Dakota’s Response:

North Dakota is not submitting a P-EBT plan for school age children.

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.
- How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours? (See Q&A #29)
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child’s eligibility? Specifically, how will the State determine that:
 - the child’s child care facility is closed or is operating with reduced attendance or hours, or

- the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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.

North Dakota's Response:

Responsible state agencies:

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- North Dakota Department of Human Services
- North Dakota Department of Public Instruction

Identifying SNAP Enrolled Children

- North Dakota will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT's authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- North Dakota 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 childcare facility through the end of the school year as long as the household continues to receive SNAP.
- North Dakota understands that a child's eligibility for P-EBT childcare benefits ends when a child's SNAP enrollment ends.

- North Dakota will not be submitting a P-EBT plan for school children and therefore, will not require the additional verification needed to ensure that children receiving P-EBT childcare benefits will not receive P-EBT school age benefits.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to childcare for each of the months of the current school year through December 2021 relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, North Dakota will use the sum of CACFP lunch claims for childcare centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state's lunch claims for the fall semester.
- North Dakota will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

Setting Benefit Levels Using the CACFP Data Method

- North Dakota will set an average monthly P-EBT childcare benefit based on the average for both the fall and spring semester. The averages are calculated using **the following three factors:**

Fall and Spring 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: $180 \div 9 \text{ months} = 20$ days 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

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	210,402	September 2021	186,880	
October 2019	242,742	October 2021	185,617	
November 2019	199,927	November 2021	180,311	
December 2019	191,380	December 2021	174,586	
Total	844,451	Total	727,394	-13.9%

Table 2: Reduction in CACFP lunch claims – 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	230,017	January 2022	176,669	
February 2020	209,936	February 2022	176,801	
March 2019	226,987	March 2022	218,798	
April 2019	243,733	April 2022	204,868	
May 2019	N/A	May 2022	N/A	
Total	910,673	Total	778,136	-14.6%

Average monthly P-EBT childcare 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/Spring Semesters	14.25%	20	9	\$7.10	\$20

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:

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.

North Dakota's Response:

As noted in section 5, North Dakota proposes to set a standard monthly P-EBT Childcare benefit for the 2021/2022 school year of 14.25%. This equates to a monthly benefit amount of \$20 for both the Fall and Spring semesters. (\$7.10 x 20 school days per month x 14.25%)

This benefit level is based on North Dakota's most recent analysis of CACFP data that shows participation rate at 13.9% below pre-pandemic levels through the Fall semester and a 14.6% participation rate below pre-pandemic levels for the Spring semester minus the month of May 2022 data. May 2022 data is not complete as of the date of this plan submission.

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)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

North Dakota’s Response:

North Dakota plans to issue a lump sum childcare P-EBT benefit.

TIMELINE OF EVENTS	
JUNE 30, 2022	Submit P-EBT Childcare Plan to FNS
JULY 8, 2022	Approval of P-EBT plan by FNS
JULY 15, 2022	Press Release and Social Media Posts
JULY 18, 2022	P-EBT benefit issued
JULY 18, 2022	Notices to eligible SNAP families

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?

North Dakota’s Response:

Childcare P-EBT benefits will be issued to all eligible children under age 6 and receiving SNAP via the EBT card that their monthly SNAP benefits are issued to. There is no new card design.

- 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.

North Dakota’s Response:

North Dakota will use the sub-benefit type of FSPEBT to distinguish between P-EBT from SNAP and DSNAP issuances. This is the same sub-benefit type used in previous issuances of 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.

North Dakota's Response:

North Dakota will have P-EBT benefits be the first spend/draw priority of benefits.

- Describe how the state will handle returned EBT cards.

North Dakota's Response:

North Dakota does not anticipate having any returned EBT cards since issuance will occur directly to the SNAP EBT card. However, should a SNAP household eligible for this childcare P-EBT benefit no longer have their EBT card because they no longer receive SNAP benefits, the household will be referred to their local Human Service Zone office to obtain a replacement EBT card. Currently North Dakota does over-the-counter issuance of EBT cards for SNAP.

- 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.

North Dakota's Response:

North Dakota will use the same expungement process used for regular SNAP benefits.

- 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?

North Dakota's Response:

P-EBT benefits for children under age 6 receiving SNAP will be issued to the same EBT card that SNAP benefits are issued to. North Dakota plans to send a separate issuance file to the EBT processor for all P-EBT benefits. These benefits will be coded as P-EBT benefits on the issuance file. If a household no longer has the EBT card they received when receiving SNAP, they will be directed to contact their local human service zone office for a replacement.

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.

North Dakota's Response:

North Dakota will utilize a P-EBT Hotline for all phone calls and a P-EBT email for all questions, disputes, or issuance errors for Childcare P-EBT. This is the same process used during previous P-EBT issuances. A temporary staff will be hired in coordination with the North Dakota Department of Public Instruction to assist with all phone calls and emails. Disputes will be tracked on a spreadsheet and research done to resolve all disputes.

- 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.

North Dakota's Response:

North Dakota continues to be committed to equal access for all families regardless of their circumstances. North Dakota will work with all community partners, vendors, and families, as needed, to ensure that all eligible children receive the P-EBT benefit. Social security numbers will not be required for any P-EBT eligible children.

- 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).

North Dakota's Response:

North Dakota will do a press release as well as social media notifications regarding the Childcare P-EBT, who is eligible, how the benefits can be used. North Dakota will send notices to all eligible SNAP households regarding their eligibility.

- 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.

North Dakota's Response:

Any households that receive the P-EBT benefit but do not want the benefit, will be informed that they do not need to use the benefits and can inactivate and/or destroy their EBT card.

- 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?

North Dakota's Response:

North Dakota will send a notice to each eligible household receiving Childcare P-EBT benefits. This notice will indicate that benefits will be issued to the existing SNAP EBT card and benefits can be used the same way regular SNAP benefits are used. The telephone

number and P-EBT email address will be provided along with instructions for obtaining a replacement card, if needed.

Non-SNAP households will not receive a specific notification however, information will be posted on the Department of Human Services social media pages and webpage as to who is eligible for Childcare P-EBT.

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.

North Dakota's Response:

North Dakota will track all issuance errors via spreadsheet as per previous P-EBT plans. Any issuance errors resulting in issuance to an incorrect household and requiring a new issuance to be completed to the correct household, will be discussed with USDA-FNS for further guidance on reclaiming any incorrectly issued benefits.

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
Deb Kramer, SNAP Director



Signature
Linda Schloer, Director Child Nutrition and Food Distribution Program

Date of Request: July 11, 2022