

**State Plan for Pandemic EBT
Children in Child Care, 2022-2023**

| | |
|-------------------------------|---|
| Issuing Agency/Office: | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program |
| Title of Document: | State Plan for Pandemic EBT: Children in Child Care, 2022-2023 |
| Document ID: | |
| Z-RIN: | |
| Date of Issuance: | September 8, 2022 |
| Replaces: | N/A |
| 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) 2022-2023. (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 State Guidance on Coronavirus P-EBT: [Click Here](#)

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

State Plan for Pandemic EBT
Children in Child Care, 2022-2023

1. State: Washington

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
- b. Estimated monthly and total *amount* of P-EBT benefits the state will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the state will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care
- e. Names of state agencies involved in administering this plan.

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 2022 through June 2023, for example).

Response:

The Washington Department of Social and Health Services' (DSHS) P-EBT plan for the 2022-23 school year covers the period of September 2022 through May 2023 (*final month with the public health emergency in effect*) for children in childcare only.

Washington estimates a total of 160,000² children under six are eligible for P-EBT in the 2022-23 school year and a total of **\$70,560,000** in P-EBT benefits to children in childcare over the eight qualifying months from September 2022 through April 2023 and a partial prorated month for May 2023. Upon approval, issuances for Childcare benefits is scheduled to begin tentatively July 2023 and complete by USDA's issuance deadline of December 31, 2023 as detailed under Section 7.

Washington is committed to informing USDA of any significant increase or decrease in these data points during the 2022-23 school year. We continue to work with our third-party contractor, Accenture, to validate internal SNAP eligibility data and issue P-EBT benefits.

5. P-EBT for Children in Child Care (see Q&As #26-33)

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.

There are no changes for P-EBT for children in child care from SY 2021-2022. USDA encourages states to refer to their **approved** SY 2021-2022 child care plan to complete this section. Please describe:

- how the state will identify eligible children and confirm their eligibility consistent with the above standard,
- how the state will set benefit levels for children,
- the roles and responsibilities of each state agency or other partners involved in P-EBT and
- any simplifying assumptions the state proposes to use and the justification for using those simplifying assumptions.

² Washington's total P-EBT recipient children under six during the 21-22 school year is 150,711, a 6% increase from 141,420 P-EBT recipient children under six during the 20-21 school year. Estimated 160,000 P-EBT eligible children for the 22-23 school year is based on 150,711 with an additional 6% anticipated increase.

If the state will establish a reduction in access to child care using the CACFP data method, we recommend that the state respond to all points as described in their **approved** SY 2021-2022 child care plan, such as:

- The state will confirm that there has been a statewide reduction in access to child care for each of the months of the current school year relative to the same months immediately prior to the pandemic, and will share this data and calculations with USDA before issuing benefits for any months.
- 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-44³. The state will exclude at-risk lunches and adult lunches.
- The state will set an average monthly P-EBT child care benefit using the reduction in aggregate lunch claims over a designated period of time, the average number of school instructional days over the course of the current school year, and the SY 2022-2023 P-EBT benefit per day.
- The designated period over which the state will set the average monthly benefit (e.g., a separate average monthly benefit for the fall semester and the spring semester).
- The state will monitor CACFP lunch claims through the end of the school year (or through the end of the public health emergency, as applicable) and will only issue benefits for months where lunch claims remain below claims for the most recent same month prior to the pandemic.

USDA will continue to support states with their calculations for the above approach.

If the state will establish a reduction in access to child care using a different approach, such as individual children's eligibility or proximity to area schools, then please describe below what the state will do and how this approach will be consistent with the above standard, such as:

- 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 #30)
- 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 those children's eligibility? (See Q&A #32-33). 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

³ The burden associated with state reporting of CACFP meal claims via the FNS-44 form is covered under OMB Control number 0584-0594, *Food Programs Reporting System (FPRS)*, expiration date July 31, 2023.

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.)

Response:

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

DSHS:

- Develop P-EBT program policy, and
- Transfer demographic information for children under six eligible to receive P-EBT through our Automated Client Eligibility System (ACES) to Accenture enforcing privacy requirements.

Accenture:

- Compare and consolidate eligibility data,
- Determine benefit levels for children under age six,
- Work with our EBT vendor (FIS) to issue specialized P-EBT 'white cards' and benefits, and
- Manage the P-EBT Contact Center for customer service.

Identifying SNAP Enrolled Children

- Washington will identify non-school children who began school year 2022-2023 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.
- The state will make the reasonable simplifying assumption that non-school children who began receiving benefits as a 5-year-old earlier in school year 2022-2023 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- For the partial prorated month of May, Washington will identify children who are approved for SNAP from May 1 through May 11. Any households with eligibility for SNAP beginning after this date will not be eligible for P-EBT due to the May PHE expiration.
- Washington understands that a child's eligibility for P-EBT child care benefits ends when a child's SNAP enrollment ends.
- Washington will ensure that children who receive P-EBT benefits under the state's approved plan for school children will not also receive P-EBT child care 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 child care for each of the months of the current school year relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, Washington 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. The state will exclude at-risk lunches and adult lunches.
- Washington 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

- Washington will set an average monthly P-EBT child care benefit for the entire year from September 2022 through May 2023. The average monthly benefit will be totaled into one lump sum payment to eligible children and the averages are calculated using **the following three factors:**
 1. The percentage reduction in aggregate lunch claims between September 2022 through May 2023 relative to the same months between 2019 and 2020. To determine this reduction percentage amount, the state will use CACFP reimbursement data provided by USDA shown below. Once received, USDA requests final CACFP reimbursement rates and calculated benefit amounts to be confirmed with them prior to issuance.
 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: **$180 \div 10 \text{ months} = 18$** days per month.
 3. The school year 2022-2023 P-EBT benefit per day of \$8.18

Table 1: Reduction in CACFP Lunch Claims—SY 22-23

| CACFP Lunch Claims | | CACFP Lunch Claims | | Percent Change, SY 22-23: To be applied to daily rate and number of school instructional days per month |
|---------------------|-----------|--------------------|-----------|---|
| Pre-pandemic Months | | Pandemic Months | | |
| September 2019 | 744,888 | September 2022 | 559,087 | |
| October 2019 | 923,284 | October 2022 | 550,838 | |
| November 2019 | 718,372 | November 2022 | 492,092 | |
| December 2019 | 677,159 | December 2022 | 449,946 | |
| January 2020 | 802,704 | January 2023 | 585,763 | |
| February 2020 | 779,073 | February 2023 | 545,031 | |
| March 2019 | 872,240 | March 2023 | 690,022 | |
| Total | 6,450,691 | Total | 3,872,779 | |

Note:

CACFP Lunch Claims: Free, reduced price, and paid lunches for CACFP child care centers (excluding at-risk lunches) and family day care homes. The pre-pandemic month figures above are total lunches reported to USDA on FNS-44, Part E, column D, minus columns A2 and C, for lines 33, 36, and 39.

Before calculating the benefit for SY 22-23, Washington commits to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months remain below CACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

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 2022-2023. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

| SY 2022-2023 July 1, 2022 - June 30, 2023 | Free Reimbursements USDA School Meal Programs | | | |
|--|--|-----------|--------|---------------|
| | Lunch | Breakfast | Snack | Daily Total |
| Contiguous U.S. | \$4.43 | \$2.67 | \$1.08 | \$8.18 |
| Alaska | 6.87 | 4.21 | 1.75 | 12.83 |
| Hawaii, Guam, Virgin Islands, Puerto Rico | 5.10 | 3.09 | 1.26 | 9.45 |

Notes:

1. Lunch rates include the 8 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
4. The figures include the temporary additional funding for school lunch and school breakfast authorized under Section 2 of the Keep Kids Fed Act of 2022.

Source: <https://www.federalregister.gov/documents/2022/07/26/2022-15892/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>

- 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:

As outlined under **Section (5), P-EBT for Children in Child Care**, Childcare P-EBT benefits will be based on the percentage reduction of CACFP lunch claims from September 2022 through May 2023 compared to the same months in both between 2019 and 2020. As the PHE ended May 11, 2023, May benefits are prorated in the table outlined below and June will not be included.

Washington will follow USDA guidance using the provided meal reimbursement rates. We will publish the confirmed benefit amounts on our DSHS P-EBT website and within approval letters to families.

Average monthly P-EBT child care benefits for SY 2022-2023 are as follows:

Table 2: Childcare Benefit Calculation using CACFP Lunch Claims—SY 22-23

| Child Care Calculation | % Change in CACFP Lunch Claims | Average Operating Days per Month | # of Months in the School Year | Daily Benefit Amount | Average Monthly Benefit |
|---------------------------|--------------------------------|----------------------------------|--------------------------------|----------------------|-------------------------|
| September 2022-April 2023 | -29.8% | 18 | 8 | \$8.18 | \$43.88 |
| May 1 – May 11, 2023 | -29.8% | 9 | 1 | \$8.18 | \$28.94 |

Percent Change in CACFP Lunch Claims: CACFP lunch claims will be determined once USDA provides necessary reimbursement data.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2022-2023 with estimated dates for major milestones in your plan.

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

Please also address each of the following:

- Will the state issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the state distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your state did not do so in P-EBT issuances for previous school years. This will greatly facilitate the states’ ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.

- How will the state handle expungement of P-EBT benefits? USDA recommends that states follow the same expungement rules that the state currently follows for SNAP.
- How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response:

Washington will issue all P-EBT child care benefits to eligible children in one lump sum payment **tentatively planned for July 2023 with the bulk of payments issued by September 30, 2023**, and ensure all P-EBT issuances are complete **by December 31, 2023**. This issuance will include eligible months from September through May, depending on SNAP enrollment for each child. Having a single issuance will allow for advanced planning for the final year of P-EBT and be coordinated with approved Summer P-EBT benefits to avoid potential comparisons by households.. Final benefit amounts have been confirmed with USDA.

As this is the final year of P-EBT, any and all issuances (including ongoing fair hearings) following this date will be subject to USDA federal funding and approval. Both DSHS and Accenture will ensure issuance schedules are planned in advanced with FIS EBT to ensure that any limitations with mass issuance of new cards can be addressed. Upon approval of our P-EBT plan, DSHS will track the following milestones:

- Communication plan will begin, and P-EBT will be announced to families and public both our P-EBT website and social media which will also encourage families to opt into SMS updates.
- DSHS will provide SNAP eligibility data for eligible children directly to Accenture beginning June 2023.
- Issuance of benefits to new and existing eligible children will begin in July 2023 with the bulk of issuance planned by September 30, 2023. Washington will use the extended issuance deadline, December 31, 2023, primarily to address case corrections.
- The public will be notified of the December 31, 2023 issuance deadline and P-EBT's closure following the May 2023 PHE end date. This will include information on Childcare eligibility ending after this date.

Each P-EBT eligible child will be issued benefits on a designated 'white card' that is separate from a SNAP EBT card. Children previously issued P-EBT cards will have their benefits reloaded and newly eligible children will be issued new cards.

New P-EBT cards and approval letters will be mailed to the last known address on file as reported by households to local school districts during the school year. Upon the

announcement of Summer P-EBT benefits, messaging will encourage households to ensure all residential and mailing addresses are updated to prevent any issues from delivery. In addition, the P-EBT Contact Center will provide opportunities for households to report any address changes or card replacements needs.

SNAP and D-SNAP will be designated with different benefit types in our automated eligibility system as with the 2022-23 school year plan and Washington will continue to set P-EBT benefits to spend-first.

P-EBT cards that are returned back to FIS EBT as undelivered will be deactivated and securely shredded. Through an optional opt-in SMS service detailed under **Section (8), Customer Service** and operated by Accenture, cards will be compared to households who have opted into SMS updates to and can send an automated text update letting them know the address was undeliverable and encourage them to update their information through the P-EBT Contact Center.

For the purpose of P-EBT benefits, Washington cannot replicate SNAP expungement rules for P-EBT due to its external third party structure. The SNAP expungement process is automated through internal DSHS systems to track transactions and send specific reminders when benefits have not been used after specific times. P-EBT data is not stored within these systems.

Additionally, federal regulations distinguish P-EBT as a separate program from SNAP. Despite similarities to the delivery of SNAP benefits, P-EBT requirements are separately governed by the Families First Coronavirus Act (FFCRA) and not bound by SNAP regulations. DSHS will use the SNAP expungement timeline of 274 days for P-EBT benefits, which will be included in initial eligibility notices to households. Once P-EBT benefits are expunged due to nonuse, they cannot be replaced. P-EBT benefits will also not be replaced if they are lost and/or stolen due to fraudulent usage.

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

To complete Section 8, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates. -

- 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:
 - a. 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:
 - i. A description of P-EBT
 - ii. Instructions for PINing a P-EBT card
 - iii. Explanation of where benefits can be used
 - iv. Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - v. Explanation of violations and penalties, such as trafficking
 - vi. An indication that benefits are non-transferable
 - vii. Instructions for destroying the card, if they want to decline benefits
 - viii. 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)
 - b. How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - i. 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.
 - ii. Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

Building off the Washington approved state plan for 2021-2022, Accenture will provide customer service to families via designated call center separate from our DSHS call center. Assistance is available to all households via phone regardless of primary language, disability, or access to technology. The P-EBT contact center will also work with foster children, and can assist households who may be missing eligibility information. The DSHS P-EBT website will serve as a point of information and resource to parents. The P-EBT Contact Center will be the primary contact for benefit amount, concerns about eligibility, benefit levels, or address changes. Accenture will work collaboratively with DSHS and OSPI when cases need to be elevated due to questions regarding P-EBT ineligibility or with the benefit amount.

In regards to ineligibility or benefit amount issues that cannot be resolved by the call center, the third party vendor will forward those identified cases as appropriate to Washington under *Section (9), Over-issuance of P-EBT benefits*, for analysis and review. Washington is committed to equitable access to all eligible families regardless of circumstance and. DSHS will work with its internal and external partners to share information on P-EBT in efforts to help families properly access their benefits when approved.

Washington will collectively design and launch a communications campaign and continue to provide updates via the P-EBT website and FAQs. Further communication campaigns will continue to include direct communication with the public and the development of a communications tool-kit for schools, community organizations, and advocates. The goal of this toolkit is to increase general awareness of P-EBT and assist families with questions as necessary. Messaging to internal DSHS staff will be created to help direct families who may call DSHS call center incorrectly.

Information provided includes, but is not limited to; who is eligible, ensuring families provide current address, the benefit amounts and contact information for questions or concerns. This campaign will also inform families that due to the expiration of the PHE in May 2023, this will be the last year of Childcare P-EBT benefits.

Public awareness campaigns will continue to include:

- Press Release
- Social Media
- Web pages
- Partner state agencies (i.e. Department of Health and the Department of Children, Youth, and Family (DCYF))
- Partner nonprofits and hunger advocacy groups
- Retailer Association
- Opt-in SMS service provided by our third-party contractor

Direct communication with P-EBT eligible households will be in the form of a notice from the third-party contractor, on behalf of DSHS. Notices of eligibility will be mailed as eligibility is being determined **beginning tentatively July through September 2023**. Washington will ensure the notice includes:

- 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 contacting the P-EBT Contact Center if they have questions or need assistance.
- Information on benefit expungement rules.

In addition to the above, our third-party contractor will provide a voluntary service via text that parents can opt in to receive the information above. Under this service, parents will receive SMS based updates including benefit awards, card mailing and expungement. Opted-in users can choose to opt-out of receiving P-EBT text message updates by replying STOP to (509) 661-5341 at any time. Users will then receive one last message to confirm that they have been successfully unsubscribed to the P-EBT text message updates service and will not receive any further texts. Users also have the option to start messaging again by replying START.

Following the May PHE expiration and December 31, 2023 P-EBT issuance deadline, Washington will focus its efforts on winding down and closing out the program. This includes closing the P-EBT contact center. Once the P-EBT contact center is closed, households will no longer be able to utilize this service and the DSHS contact center will not have access to P-EBT case information to assist either. In preparation of this, Washington will inform the public of the closure and encourage families to use their remaining benefits through a reminder notice, and replace any P-EBT cards by a specified to-be-determined date.

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their approved plan from SY 2021-2022 with all necessary updates.

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:

Washington will not pursue overpayment claims against minors as the "white cards" are issued directly to eligible children. We will mitigate over-issuance by retroactively issuing benefits where data will be validated prior to issuing benefits. Cases found eligible will be corrected and cases found ineligible will be acted on to not issue ongoing P-EBT.

If an over-issuance takes place, Washington will contact USDA and provide a description of the error, the number of children involved, and the value of the over-issuance through a spreadsheet provided by USDA. Washington will ensure parents are given effective notice that the state may correct significant mistakes in P-EBT issuances. Washington will contact FNS prior to reclaiming these 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, 2022 through September 30 2023. 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.”

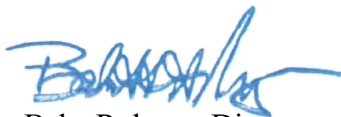
13. Civil Rights Statement

The state will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

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:



Babs Roberts, Director of Community Services Division



Leanne Eko, Chief Nutrition Officer, Child Nutrition Services

Date of Request: June 20,2023