

**State Plan for Pandemic EBT: Children in School  
School Year 2020-2021**

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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<b>Summary:</b>	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

*Additional context and background for this document can be found at:*  
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

**State Plan for Pandemic EBT: Children in School**  
**School Year 2020-2021**

1. **State:** Vermont
2. **Primary Citations:** Families First Coronavirus Response Act;  
Continuing Appropriations Act, 2021 and Other Extensions Act
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*<sup>1</sup> covered by this initial plan (or subsequent amendment).

- a. The *date range* covered by this State plan or amendment.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- e. 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

**Response:**

By executive order of the Governor, all Vermont schools started on the same day, September 8, 2020, for the 2020-2021 school year. The date range for this initial plan is September 2020 through June 2021. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The Vermont AOE conducts a monthly survey of schools and requests information about students' learning modalities for each month. This survey does not include information about which children are receiving free and/or reduced-priced meals. In September 2020, 63.8% of students were engaged in hybrid learning and 17% were learning remotely. The estimates below are based on fully remote and hybrid monthly rates of \$119.35 and \$71.61, respectively (please see information below about these rates in the *Benefit Levels* section of the plan).

- Monthly issuances of \$3,442,497.98 (based on a total of 38,978 students, 63.8% of students hybrid and 17% fully remote)
  - Estimated monthly amount issued to school children in SNAP households is \$1,032,749.39
  - Estimated monthly amount issued to school children in non-SNAP households is

\$2,409,748.59

- Total issuance of \$34,424,979.82 (monthly estimate multiplied by 10 months of payments during the school year)
  - Estimated total amount issued to school children in SNAP households is \$10,327,493.95
  - Estimated total amount issued to school children in non-SNAP households is \$24,097,485.87

The estimated total *number* of children to which the State will issue P-EBT benefits (based on last school year's data) is:

- The estimated number of school children in SNAP households is 11,527
- The estimated number of school children in non-SNAP households is 27,451

As of the date of this requested plan amendment, July 13, 2021, Vermont has issued its first round of P-EBT benefits for the benefit months of September through February using a fully remote rate of \$119.35 and a hybrid rate of \$71.61. This first issuance totaled \$15,088,107.65 for 33,792 students.

In this plan amendment, Vermont is requesting approval to use the following hybrid rate amounts for March through June (please see more detailed information in the *Benefit Levels* section of the plan):

<b>Month</b>	<b>Hybrid Rate</b>
March	\$38.19
April	\$37.51
May	\$33.42
June	\$30.69

Using the proposed hybrid rates above and current data for the second planned round of P-EBT benefits for the months of March through June, Vermont anticipates the following payment amounts:

<b>Month</b>	<b># students fully remote</b>	<b>Remote rate</b>	<b>Total remote</b>	<b># students hybrid</b>	<b>Hybrid rate</b>	<b>Total hybrid</b>	<b>Grand Total</b>
March	4,844	\$119.35	\$578,131.40	24,891	\$38.19	\$950,587.29	\$1,528,718.69
April	4,489	\$119.35	\$535,762.15	24,821	\$37.51	\$931,035.71	\$1,466,797.86
May	4,384	\$119.35	\$523,230.40	20,362	\$33.42	\$680,498.04	\$1,203,728.44
June	5,601	\$119.35	\$668,479.35	18,509	\$30.69	\$568,041.21	\$1,236,520.56
<b>Total</b>							<b>\$5,435,765.55</b>

The total amount of P-EBT benefits expected for the 2020-2021 school year is \$20,523,873.20 for a total of 37,693 children. These estimates are lower than the projections noted above, which projected total P-EBT benefit costs of \$34,424,979.82.

The State has submitted a request for \$787,284 in administrative costs.

The State intends to issue P-EBT benefits retroactively on a quarterly basis, no later than 30 days

following the end of the quarter, acknowledging that the State will need some time to ensure it has an operational data system for school districts to report data to ESD. Vermont will share an updated issuance timeline when more information is available.

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<sup>1</sup> The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

#### 4. P-EBT for School Children

##### 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 2020-2021, *or*
  - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
  - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 *and* the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? 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 SNAP-recipient and non-SNAP-recipient children, and 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).

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

The following two state agencies are responsible for the administration of P-EBT:

- Agency of Human Services, Department for Children and Families, Economic Services Division (ESD), which is responsible for the issuance of P-EBT benefits, P-EBT cards, P-EBT replacement cards, notices to customers and customer service and support as well as creating a P-EBT data system for schools to report information.
- The Agency of Education (AOE), in collaboration with local school districts, is

responsible for eligibility determination through the direct certification process, the NSLP application process and monitoring and collecting of student learning mode classifications.

To identify eligible school children and confirm their eligibility, Vermont will use data provided directly by the school districts to ESD. AOE will instruct school districts to provide ESD with a monthly list of all students eligible for free and/or reduced priced meals who qualify for P-EBT based on their learning modality (remote or hybrid) that month. Eligibility status will be based on 19-20 eligibility information unless an application or new direct certification information has been received for that student in school year 20-21. In that case, the more recent information will be used. Schools will be instructed to remove any students who have graduated, transferred or otherwise un-enrolled since school year 19-20.

All Vermont schools were instructed to process free and reduced-price meal applications this fall, if they were submitted by households. Some schools made efforts to collect applications, with varying levels of success, while others did not. To simplify benefit issuance and account for the fact that households may not have submitted applications earlier in the year even though they would have been eligible, we will instruct schools to use the following simplifying assumption: In the first submission of student eligibility information to DCF (for September-December), use the child's current eligibility status and apply it back to the start of the school year. If an application is received after April 1, schools will be instructed to apply the benefit to current and future months, but not retroactively.

A uniform process will be used for all students (SNAP and non-SNAP recipients) to confirm each student's lack of access to meals at schools. Local school districts track each student's learning modality (fully in-person, hybrid or remote). For the purpose of P-EBT, private schools who administer NSLP also track students' learning modes.

Vermont intends to utilize simplifying assumptions to issue two benefit amounts per month:

- One amount for remote students, and
- One amount for hybrid learning mode students

Please see the Benefit Level section of this plan for more details about monthly benefit amounts.

Vermont intends to issue P-EBT retroactively on a quarterly basis. ESD and AOE will request that school districts to provide a list of all eligible children with each child's learning modality for that month no later than the 15<sup>th</sup> day of the following month.

## 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?
- 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.

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

Vermont will identify, confirm and monitor the status of individual students through monthly reporting by the school districts to ESD. ESD and AOE will provide guidance to each school district on how to classify and report students' learning modes. The Vermont Agency of Education has provided a framework for school operations during COVID that requires reduced attendance and remote learning at certain state-determined levels. However, the framework allows individual school districts to make their own decisions about how they will operate within this framework. This means that some schools have chosen to operate more cautiously than required by the framework. The framework allows for rapid transition between learning modalities if local conditions change. Across the state, learning modalities have been extremely fluid, with many schools suddenly going remote for one- or two- week periods after outbreaks have been identified in their schools or communities. In other cases, schools have made individual classrooms remote for one- or two- week periods after a case is discovered, while the rest of the school stays in-person. In addition, the state has coordinated a remote learning option for students who have opted to stay

remote for the entire year, regardless of the attendance modality of their individual school. This option means that even schools who are considered 100% in-person likely have some students using the 100% remote option. Given this variability, the most accurate way to identify P-EBT eligible students is to track the learning modality on an individual student basis, rather than a school building basis.

All eligible students in hybrid or fully remote learning modalities will be eligible for P-EBT. Districts or schools operating fully in-person will have eligible students if the student has a remote or hybrid learning modality for that month. School districts will submit this information via a data file system that will be developed for this purpose to ESD. Because this information is being provided monthly, school districts are able to update student information, including changes in learning modalities, each month.



**5. 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 and a lunch for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs		
	Lunch	Breakfast	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86 <sup>1</sup>
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.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]

In an effort to structure the program in a way that is easier for the school districts to manage and more easily communicate to clients and stakeholders, Vermont intends to utilize the simplifying assumptions option by issuing P-EBT benefits in two distinct monthly amounts, one amount for students enrolled in a fully remote learning mode (inclusive of students whose school district is operating an in-person or hybrid model, but the family opts into fully remote learning) and one amount for students enrolled in a hybrid learning mode.

By statute, Vermont schools are required to offer a minimum of 175 school days per academic year. Please see 16 V.S.A. §1701 (<https://legislature.vermont.gov/statutes/section/16/025/01071>). The fully remote benefit will be calculated by dividing the total required school days (175) by the number of months in schools are in session each year (10), 17.5 days per month. The full P-EBT benefit amount equates to \$102.55 per month<sup>2</sup>. Using the required minimum of 175 school days ensures that weekends and holidays are not included in the benefit amount. Dividing these total school days by each month school is in session (September to June) equates to an equal benefit amount per month,

<sup>1</sup> Noting that the daily rate was updated by USDA to \$6.82/day.

<sup>2</sup> Noting that the fully remote rate was updated to \$119.35 based on the daily rate of \$6.82.

which is not only easier to message and explain, but also ensures consistency for families relying on this benefit to help feed their children. Families can factor this known benefit amount in their monthly budgets.

The methodology used to determine the hybrid rate is based on the AOE monthly survey of learning modalities across all public schools. For the four-month period of September through December, the most common schedule of hybrid learning was two days in-person and three days remote. Please find data below about the hybrid schedules of Vermont schools for the period September through December supporting Vermont’s hybrid rate assumptions.

<b>Month</b>	<b>2 days in-person and 3 days remote</b>	<b>4 days in-person and 1 day remote</b>	<b>Rotation of half school remote for 5 days and half in-person</b>	<b>3 days in-person and 2 days remote</b>
September	150 schools	13 schools	12 schools	
October	107 schools	37 schools	17 schools	
November	88 schools	35 schools	15 schools	1 school
December	95 schools	30 schools	12 schools	2 schools

The hybrid benefit will be calculated by multiplying the full benefit of 17.5 days per month times 3/5 (percentage of remote instruction days per week), for a total of 10.5 days per month of benefits for the hybrid students. The monthly hybrid benefit amount equates to \$61.53<sup>3</sup>. AOE will continue to monitor hybrid learning schedules across all public schools each month for the duration of the school year. If necessary, Vermont can adjust the hybrid rate on a quarterly basis.

Due to the beginning of return to in-person instruction, school schedules in Vermont were more widely varying in the spring of 2021. In order to arrive at a statewide hybrid rate that is fair and equitable, the hybrid benefit amount for the benefit months of March – June 2021 will be calculated using the average number of remote days across all schools with a hybrid schedule each month. Please see the chart below listing the average hybrid days each month used for each benefit calculation.

<b>Month</b>	<b>Remote days per month</b>	<b>Hybrid rate (days * \$6.82)</b>
March	5.6	\$38.19
April	5.5	\$37.51
May	4.9	\$33.42
June	4.5	\$30.69

To account for the fluid nature of the pandemic and that a student’s status may change mid-month, Vermont will be issuing benefits retroactively on a quarterly basis using the learning mode that the student is enrolled in for the majority of each month in that quarter.

## **6. Implementation Timeline, EBT Processing, and Benefit Issuance**

<sup>3</sup> The Vermont hybrid rate for the benefit months of September 2020 – February 2021 is \$71.61 each month based on the most common hybrid modality for schools of 2 days in-person and 3 days remote (10.5 days per month) multiplied by the updated daily rate of \$6.82/day.

Please provide an implementation timeline for SY 2020-2021 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 2019-2020, 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 SY 2019-2020. 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.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
  - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
  - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

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

Vermont's goal is to issue the first round of P-EBT benefits by February 26, 2021. This first round of benefits will include benefits for September through December. The feasibility of this plan will depend on the date of the plan approval and the ability of the State to set up a web-based data reporting system for school districts to report information about P-EBT eligible children. This date is also dependent on ESD being able to train a dedicated P-EBT staff and also potentially hire new staff dedicated to the P-EBT program.

The tentative plan is as follows:

Day 1 – Plan approval is received

Day 2 – Inform school districts of the reporting criteria and submission instructions so that schools can start compiling data reports on P-EBT eligible children and receive technical assistance from AOE and ESD

Day 30 – Data system is ready and dedicated and trained P-EBT ESD call center and support staff are in place

Day 45 – Schools report data on P-EBT eligible children for the period September through December

Day 60 – First round of P-EBT benefits issued

For ongoing issuance between March and June 2021, the State intends to issue P-EBT benefits quarterly on a retroactive basis. The next planned issuance would be 30 days after the end of the first calendar quarter, or April 30, for the benefit months of January through March. The final issuance would be on July 30 for the benefit months of April through June.

The data that schools will send to ESD will include a list of all students eligible for free and reduced-price meals and their respective learning modalities for each month. The goal is to issue the P-EBT benefits 30 days after the end of each quarter (15 days after receiving the final month's data in the previous quarter). This allows for the necessary data clean up and file transfer to the State's EBT processor, Conduent.

The State intends to follow the same distribution model utilized in previous iterations of P-EBT. SNAP (3SquareT) households will receive their P-EBT benefits on their EBT card, while non-SNAP households will receive benefits on a unique P-EBT card. P-BT benefits will follow the same expungement rules that SNAP follows in Vermont. New P-EBT cards will be issued to non-SNAP families for the 2020-2021 school year.

Vermont will continue to use the FSM benefit code for non-SNAP PEBT and the SSFB benefit code for SNAP PEBT. P-EBT in Vermont is spend/draw priority 1. Returned P-EBT cards are sent to Vermont DCF's EBT unit.

## **7. Customer Service**

*Recommended Standard for Household Support*

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

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

- 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 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 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 Spring and Summer of 2020, 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?

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

ESD and AOE will have a multi-faceted approach to ensure robust communication to all eligible households. ESD has a benefit service call center, which will have its own dedicated P-EBT option. ESD will also have a database of eligibility information, reported to ESD by school districts, which ESD P-EBT staff can access to allow staff to specifically investigate a child's P-EBT eligibility, benefit amount and card issuance status. Additionally, inquiries from ESD P-EBT staff may be sent to a specific email inbox for further review and resolution.

ESD and AOE are committed to equitable access for all eligible families. Since the beginning of the pandemic, ESD has operated a general assistance housing program providing motel rooms to applicants, with relaxed eligibility rules, to ensure that families experiencing homelessness have a safe and reliable place to stay during the pandemic in a non-congregate setting. As a result, ESD has address information for many families experiencing homelessness in Vermont. In addition to this resource, ESD and AOE will work with school homeless liaisons to ensure that families receive their P-EBT benefits. ESD will also continue the collaboration with DCF's Family Services Division to determine current address, custodian, etc. of children in foster care. The State is also committed to serving all eligible children regardless of primary language. The ESD call center has translation services available for families calling in with questions about P-EBT benefits.

The State will conduct a public awareness campaign, working with schools, outreach partners and social media, including issuing a press release, posting information on-line and answering frequently asked questions. ESD and AOE will also work with schools to send out direct communications to eligible families.

## 8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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.

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

ESD and AOE are committed to working with schools to ensure that ESD has current information about eligible families, which was an issue with the 2019-2020 P-EBT issuance. To that end, upon plan approval, ESD and AOE will work with school districts on communications to families about P-EBT benefits and how to ensure that school districts have current information.

ESD is committed to thoroughly researching P-EBT cases to ensure that benefits reach eligible children. AOE will dedicate at least one FTE to assist in communications with school districts in addition to assisting in researching complex cases. In addition to receiving current information from schools, ESD also has the roster of eligible children with corrected addresses and other information from the prior school year that can be used as a reference. ESD and AOE are further committed to working directly with schools when there are questions.

## **9. Benefit Issuance Reporting**

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

## **10. Administrative Funding**

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

## **11. Release of Information**

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

## **12. Civil Rights Statement**

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

## **13. Administration of State P-EBT Plan**

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



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

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Signature  
Print Name and Title

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Signature  
Mary Rose Krueger  
State Director of Child Nutrition Programs  
Vermont Agency of Education

**Date of Request: December 30, 2020; 1/21/21 incorporating FNS-approved plan information;  
July 13, 2021**