

**State Plan for Pandemic EBT for Children Under Six, 2021-2022**

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| <b>Issuing Agency/Office:</b> | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program   |
| <b>Title of Document:</b>     | State Plan for Pandemic EBT: Children in School and Child Care, 2021-2022   |
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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 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 for Children Under Six, 2021-2022

### 1. State: South Carolina

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**<sup>1</sup> 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

#### **State's Response:**

The South Carolina Department of Social Services (DSS) proposes to administer a Children Under Six P-EBT benefit for the 2021-2022 school year and extend eligibility to all children under six who are a member of a household that received SNAP benefits at any time between September 1, 2021 and May 31, 2022.

Estimated number of SNAP children under the age of six is 96,606.

**Estimated Issuance Amounts:** South Carolina estimates 96,606 children will be eligible for a \$50 monthly benefit. The monthly benefit amount was determined by comparing Child and Adult Care Feeding Program (CACFP) meal claim data for the time periods of September 2019-February 2020 versus September 2021-February 2022. Based on this analysis, the estimated total benefit for children under 6 would be \$450 (9 months) and the total issuance amount for the estimated 96,606 children equates to \$43,472,700. Please see Section 4 for methodology regarding the

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<sup>1</sup> 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).

calculation of statewide monthly benefit amount for Children under Six P-EBT.

| Total Number of Children | Estimated Monthly Benefit Amount | Total Estimated Monthly Issuance | Total Estimated Child Care P-EBT Issuance |
|--------------------------|----------------------------------|----------------------------------|---|
| 96,606                   | \$50                             | \$4,830,300                      | \$43,472,700                              |

**Administrative Cost Estimates:**

The estimated total amount of administrative funds the State needs to complete the work described in this plan is \$1,761,616. This includes estimated EBT contractual costs, as well as administrative/staffing costs for the State Agency, as described below.

During the previous iteration of P-EBT, South Carolina discovered that issuing P-EBT benefits to existing SNAP EBT cards was problematic due to misrepresentation of households regarding non-custodial versus custodial parents. Therefore, for the 2021-2022 Children Under Six P-EBT program, the state intends to issue new/unique P-EBT cards to all SNAP children under the age of six. The state will continue its use of the previously established benefit code (DSEP for non-SNAP) which was created specifically for P-EBT.

|                   | Initial Case Set Fee (Month 1)     | Cost (Per Month, Per Card) Months 2-9 | Cost Per Student | # SNAP Children | Total Estimated Cost |
|-------------------|------------------------------------|---------------------------------------|------------------|-----------------|----------------------|
| <b>CPCM</b>       |                                    |                                       |                  |                 |                      |
|                   | \$5.70                             | \$1.35                                | \$16.00          | 96,606          | \$1,545,696          |
| <b>Card Stock</b> |                                    |                                       |                  |                 |                      |
| All Students      | Included in Initial Card setup fee |                                       |                  |                 | -----                |
| Replacement Cards |                                    |                                       | \$1.50 per card  | 58,684          | \$88,026             |
|                   |                                    |                                       |                  | <b>Total</b>    | <b>\$1,633,722</b>   |

| Staffing Cost                 | Number of Staff | March - December 2022 |
|-------------------------------|-----------------|-----------------------|
| Department of Social Services | 6 Full Time     | \$127,894             |
|                               | <b>Total</b>    | <b>\$127,894</b>      |

**Tentative Issuance Schedule:** South Carolina anticipates issuing Child Under Six P-EBT benefits in one issuance cycle tentatively scheduled for July 2022. Children Under Six P-EBT benefits will be loaded onto new P-EBT cards and delivered to the SNAP household’s mailing address.

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.

#### 4. 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.

##### **State's Response:**

DSS will determine P-EBT eligibility for children under six using the State's existing SNAP eligibility system, CHIP, along with Child and Adult Care Food Program (CACFP) data acquired from the agency's Early Care and Education Division.

Based on analysis of the CACFP lunch claim data, South Carolina determined the State's child care system continues to operate at significantly reduced capacity due to the COVID-19 pandemic. The most recently available data shows a 35% reduction in CACFP lunches served between September 2021 and February 2022, compared to pre-pandemic levels (2019).

Informed by the data that reflects a reduction in child care access, South Carolina proposes to determine all children enrolled in SNAP and under age 6 (as of September 1, 2021) eligible for P-

EBT child care benefits throughout the state.

Utilizing the State's SNAP eligibility system, DSS will identify all children under age 6 as of September 1, 2021 and will issue P-EBT benefits only for the months the child was enrolled in SNAP between September 2021 - May 2022. This age cutoff date is in alignment with state regulation that requires children turning age 6 on or before September 1 to attend school. A child who turns 6 after September 1, 2021, will be eligible under the P-EBT Children Under Six plan through May 31, 2022, under a proposed simplifying assumption that the child will continue to participate in Child Care for the remainder of the school year.

In accordance with USDA FNS guidance, South Carolina is not basing the 2021-2022 Children Under Six P-EBT eligibility on proximity to an area school.

South Carolina proposes to set a standard monthly P-EBT benefit for Children Under Six at 35% of the fully virtual benefit for school age, K-12 children (set at 20 days for a monthly benefit amount of \$142) during the SY 2021-2022. The monthly P-EBT benefit amount for 2021-2022 Children under six will equate to \$50 when rounded to the nearest whole dollar.

South Carolina anticipates retroactively issuing P-EBT benefits to children under six so no prospective eligibility determination will be necessary. As stated above, South Carolina proposes using historical CACFP data, currently available, as a proxy for child care access based on pre and post pandemic numbers.

**Simplified Assumptions:**

- South Carolina proposes the simplifying assumption that a child who turns 6 after September 1, 2021 will be designated as attending child care for the remainder of the school year.
- South Carolina proposes a simplifying assumption to determine all children under 6 and enrolled in SNAP to be eligible for P-EBT benefits statewide based on a DSS analysis showing that South Carolina's child care system continues to operate at reduced capacity across the state due to the COVID-19 pandemic.

South Carolina is utilizing data DSS submits to United States Department of Agriculture, Food and Nutrition System on the CACFP FNS 44 report. Table 1 reflects the CACFP meal claims statewide for the months of September – February 2020 (pre-pandemic) and September 2021 – February 2022 (post-pandemic). The data reflects the count of meals claimed statewide during 2021/2022 to be far less than what was claimed statewide for 2019/2020. This is largely due to child care programs being forced to close in response to the COVID-19 pandemic, as well as concerns about the transmissibility of the highly contagious Delta and Omicron variants that began circulating among children not yet eligible for a vaccine in late 2021.

| <b>CACFP lunch claims pre-pandemic months</b> |                  | <b>CACFP lunch claims current school year months</b> |                  |               |
|---|------------------|--|------------------|---------------|
| September 2019                                | 395,680          | September 2021                                       | 290,071          |               |
| October 2019                                  | 479,042          | October 2021   | 254,899          |               |
| November 2019                                 | 387,217          | November 2021  | 252,834          |               |
| December 2019                                 | 358,503          | December 2021  | 260,969          |               |
| January 2020                                  | 439,743          | January 2022   | 243,675          |               |
| February 2020                                 | 417,067          | February 2022  | 316,925          |               |
| <b>Total</b>                                  | <b>2,477,252</b> | <b>Total</b>   | <b>1,619,373</b> | <b>-34.6%</b> |

## 5. Benefit Levels

### **Standard for Benefit Levels**

- The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

| <b>SY 2021-2022<br/>July 1, 2021 - June 30, 2022</b> | <b>Free Reimbursements<br/>USDA School Meal Programs</b> |                  |              |                    |
|--|--|------------------|--------------|--------------------|
|  | <b>Lunch</b>   | <b>Breakfast</b> | <b>Snack</b> | <b>Daily Total</b> |
| <b>Contiguous U.S.</b>                               | \$3.75   | \$2.35           | \$1.00       | <b>\$7.10</b>      |
| <b>Alaska</b>  | 6.03   | 3.78             | 1.63         | <b>11.44</b>       |
| <b>Hawaii, Guam, Virgin Islands, Puerto Rico</b>     | 4.37   | 2.74             | 1.17         | <b>8.28</b>        |

**Notes:**

- Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
  - Breakfast rates are those received by "severe need" schools.
  - Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

### **State's Response:**

As noted in section 4, South Carolina proposes to set a standard monthly Children Under Six P-EBT benefit at 35% of the fully virtual benefit for school age children (set at 20 days = \$142 per month). This equates to \$50 per month (when rounded). This benefit level is based on South Carolina's most recent analysis of CACFP data that shows participation at 35% below pre-pandemic levels (2019/2020 vs. 2021/2022). The state will commit to providing a comparison of March 2019 and March 2022 CACFP data (available in June 2022) to USDA FNS prior to P-EBT issuance (scheduled for July 2022) to ensure the continued decline in CACFP lunch claims and verify no adjustment is needed for the P-EBT Children Under Six benefit amount.

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

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

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

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 2020-2021. 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 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?

### **State's Response:**

South Carolina plans to retroactively issue Children Under Six P-EBT benefits on a staggered issuance cycle beginning July 20, 2022.

Based on lessons learned in administering P-EBT, DSS will issue non-school children in child care (inclusive of children who were active in SNAP after September 1, 2021 but who have subsequently had their case closed) P-EBT on new P-EBT cards. This will allow for benefit issuance to be spread out to account for retailer and integrity concerns. Furthermore, it allows for clients to distinguish their ongoing SNAP benefits from the P-EBT benefits they are owed. Therefore, DSS proposes issuing retroactive benefits owed to this population for the months of September 2021 – May 2022 beginning on July 20, 2022 and completing on or before July 29, 2022.

As P-EBT benefits are to be assigned to a P-EBT card, draw/spend priorities do not apply. However, Children Under Six P-EBT expungement will be same as standard SNAP benefits. To lower the number of undeliverable cards, the state plans to issue Children Under Six P-EBT cards to the address on file for the active SNAP case. Closed SNAP cases that include an eligible P-EBT student would receive notification to update their address prior to card issuance. Returned or

undeliverable P-EBT cards will be returned to Conduent and the information will be relayed back to the state for reconciliation purposes. South Carolina also has a built-in card replacement process in the current P-EBT Student Portal.

Major Milestones: Plan approval date will govern when DSS can implement these changes.

| Major Milestone  | Estimated Completion Date |
|--|---------------------------|
| Children Under Six P-EBT State Plan Approval             | 06/01/2022                |
| Public communication campaign begins                     | 06/15/2022                |
| Identification of eligible SNAP children                 | 07/05/2022                |
| Begin processing of Benefits (September 2021 – May 2022) | 07/20/2022                |
| P-EBT issuance completed for Children Under Six          | 07/29/2022                |

## 7. Customer Service

### *Recommended Standard for Household Support*

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

1. USDA strongly encourages States to provide a means to resolve disputes and answer from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children and caregivers with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State’s public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in over the past year, USDA recommends it include:
    - A description of P-EBT
    - Instructions for PINing a P-EBT card
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
    - Explanation of violations and penalties, such as trafficking
    - An indication that benefits are non-transferable
    - Instructions for destroying the card, if they want to decline benefits



- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
  - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
  - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

### **State's Response:**

- A P-EBT card along with a notice explaining the P-EBT program will be mailed to the household based on the mailing address listed in the State's SNAP eligibility system or validated through the Address Verification Portal.
- Basic EBT usage information will be supplied on a "buck slip" that will be included in the distribution of the P-EBT card. The buck slip will include information such as how the client will PIN the card, what can be bought with P-EBT benefits, what to do if a household does not want the P-EBT benefit, and how to contact EBT Customer Services.
- DSS will include FAQs and contact information on the agency website including a brief description of Children Under Six P-EBT, eligibility, frequently asked questions, and instructions for parents who believe their child is currently eligible and did not receive a P-EBT benefit.
- Flyers will be created explaining what can (and cannot) be purchased with P-EBT benefits. These materials will be distributed (via the South Carolina Retail Association) to grocery stores and retail establishments throughout the state and placed in prominent areas.
- SC DSS has an established email/inbox where households may forward questions and concerns and will have staff dedicated to monitoring and tracking the resolution of constituent inquiries. All eligibility issues, questions and concerns, as well as concerns related to P-EBT card issuance (to include replacement cards), card access, and timeframes for receiving P-EBT cards will be handled by DSS.
- DSS is committed to equitable access for all eligible families regardless of circumstances. DSS will continue the collaboration with the Child Welfare Safety and Permanency Division that was established during the first round of P-EBT informing the Office of Economic Services of address/location updates for foster children.
- Public Awareness Campaign: The state will conduct a public information campaign through the use of the agency's website ([www.dss.sc.gov](http://www.dss.sc.gov)) and social media platforms. South Carolina intends to issue a press release in English and Spanish to target state-wide and local news organizations.

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

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Please describe how your State will manage P-EBT payment errors.

**State's Response:**

South Carolina is committed to ensuring there are no aggregate over issuances or improper payments due to ineligible SNAP participation. The state believes utilizing the most up-to-date SNAP eligibility information available is essential to avoiding incorrect issuances of P-EBT benefits. South Carolina DSS ensure the most up-to-date information is used in the issuance of P-EBT benefits to all eligible children. Extensive time and resources will be committed to updating and correcting incorrect addresses. The state intends to use a designated web portal to provide an accessible methodology for eligible households to correct/updating old addresses. This methodology will ensure these corrected addresses are not overridden during data gathering and/or reconciliation process. The state will contact USDA whenever an issuance error has been identified and provide a description of the error, the number of children involved, and the value of the over-issuance before a corrected benefit is issued to a different household and before there is an attempt to reclaim benefits from a household. In addition, the state will include verbiage on the agency's website that will notify households that the state may reclaim mistakenly issued benefits from a household if deemed necessary or appropriate.

**9. Benefit Issuance Reporting**

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

**10. Administrative Funding**

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2021 through September 30, 2022. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will

be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

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

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

**11. Release of Information**

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

**12. Civil Rights Statement**

The State will continue to comply with civil rights requirements by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

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

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

**Signature and Title of Requesting SNAP State Agency Official:**



Amber Gillum, Deputy State Director, Economic Services  
South Carolina Department of Social Services

**Date of Request:** May 18, 2022