

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	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.

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 should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT

Children in School and Child Care, 2020-2021

1. **State:** Commonwealth of the Northern Mariana Islands (CNMI)
2. **Primary Citations:** Continuing Appropriations Act, 2021 and Other Extensions Act
3. **Executive Summary:**

The CNMI Plan for Pandemic EBT covers for the school year 2020-2021, beginning August 10, 2020 to provide P-EBT benefits to NAP and non-NAP households with children who temporarily lost access to free or reduced-price meals due to the effects of the Covid-19 which caused schools to close or operate with reduced hours. On March 27, 2020, a memorandum from the CNMI Governor was issued, amending the executive order: State of Public Health Emergency, an order (Directive 7) for all government offices and all non-essential government function to shut down until further notice. This included the Public School System. In the same memorandum, all private schools were ordered to close and remain closed until the emergency is ended or Directive (15) is ended. On August 13, 2020, the order to close schools was rescinded with conditions that schools safely re-open through compliance with social distancing and safeguarding of students, teachers, parents and school staff. Due to the Public Health Emergency, most private schools had a delayed start or closed for more than 5 consecutive days. All private schools were operating with reduced hours. The Public School System which opened on September 8, 2020 was operating with reduced hours essentially with full virtual learning through January 29, 2021. On August 31, 2020, all childcare programs and childcare services were allowed to commence contingent on approval of their re-opening plans with safety protocols. To this date, the declaration of state of public health emergency and the continued declaration of state of significant emergency establishing response, quarantine, and preventive containment measures concerning coronavirus disease 2019 (Covid-19) remains in effect.

There are currently 9,345 children enrolled in the public school system from Kindergarten to Grade 12 and another 60 in Early Head Start and 243 in Head Start for a total of 9,648 in public schools. There are approximately 14 private schools that range from pre-school, elementary and secondary with an enrollment of 1,906. In addition, there are 6 childcare facilities ranging from daycare to pre-school with enrollment of 117. The overall enrollment for public, private, and childcare facilities in the CNMI is 11,671.

The determination of P-EBT eligibility will be based on a simplified assumption for Public schools including the Head Start Program which were operated by a predominant schedule covering all PSS instructional institutions on Saipan, Tinian and Rota. In lieu of covered child care facilities, all NAP children under the age of 6 will be eligible for P-EBT benefits in condition that the child was a member of a household who received NAP benefits during the period October 1, 2020 through June 11, 2021, the date of PSS' last day of instruction. Additionally, P-EBT benefits will be provided only for the periods the household was receiving NAP benefits. As an example, if the household received NAP benefits only during January 2021 to March 2021, the child who was under the age of 6 will only receive P-EBT benefits for January 2021 to March 2021 by using the PSS schedule to determine the amount of P-EBT benefits eligible for that child. The Early Head Start Program will be considered as an entity under the covered child care facilities.

P-EBT benefits for private schools will based on the predominant schedule for each private

school. This could mean that P-EBT benefits may vary from respective private schools to another.

Note that an entity must be participating in the National School Lunch Program (NSLP) to be considered as a school or child care entity for the P-EBT program.

Application for P-EBT will be required. A simplified paper application will be available at the schools and child care facilities, NAP and the CNP office. However, applications will need to be dropped off to the NAP and CNP office. This will help in consolidating children into their respective households and to prevent duplication of child data or benefits. See Exhibit A – P-EBT Application. CNMI will determine a one-month application period. Applications will be numbered for tracking purposes and to record the number of applications issued at designated entities.

A Memorandum of Agreement between the CNMI Public School System and the Department of Community Cultural Affairs has been established to cooperatively implement P-EBT program in the CNMI. See Exhibit B – Memorandum of Agreement.

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- a. The **date range** covered by this State plan or amendment
 - The date range covered by this State plan for children in school is from August 10, 2020 to June 11, 2021.
 - The date range covered by this State plan for children in child care is from October 1, 2020 to June 11, 2021.
- b. Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range.

The NAP eligibility system does not specifically collect school information to identify school children in NAP households. Alternatively, a date range for age was extrapolated for ages 0 to 18 that fall within the category of P-EBT eligibility requirements. Approximately, 6288 individuals in the NAP's data system fall within the ages of 0 to 18, about 54 percent from the overall children enrolled in school or childcare facilities.

The FFCRA, as amended, authorizes States to make simplifying assumptions and use the best feasible available data to identify school children, determine the operating of schools, and establish State or regionally based benefit levels. The CNMI make the simplifying assumption on feasible data to group children in two categories: public schools and child care centers in one category, and private schools in another category. There are a total of 11,671 school and childcare children, an estimate of 6,288 in NAP households and 5,383 in non-NAP households. An average schedule will be determined per student group which will be used to derive the number of P-EBT eligible days per month. CNMI estimated that the total amount of P-EBT benefits that will be issued for SY 2020-2021 is \$11,114,699. The rate of reimbursement per child will be \$7.97 per P-EBT eligible day. Estimated amount issued to school children in SNAP households.

- CNMI estimates a monthly amount of \$589,207.03 in P-EBT benefits will be issued to school children in NAP households for total of \$5,988,283.41.

- Estimated amount issued to school children in non-SNAP households
CNMI estimates a monthly amount of \$499,750.16 in P-EBT benefits will be issued to school children in non-NAP households for total of \$5,075,200.36.
- Estimated amount issued to non-school children in child care.
CNMI estimates a monthly amount of \$4,655.93 in P-EBT benefits will be issued to non-school children in child care for total of \$51,215.22.

CNMI estimates a total number of 11,671 school and non-school children will be issued P-EBT benefits.

- c. Estimated total **number** of children to which the State will issue P-EBT benefits.
- Estimated number of school children in SNAP households.
CNMI estimates a total number of 6,288 school children in NAP households will be issued P-EBT benefits.
 - Estimated number of school children in non-SNAP households.
CNMI estimates a total number of 5,329 school children in non-NAP households will be issued P-EBT benefits.
 - Estimated number of non-school children in child care
CNMI estimates a total number of 54 child care non-school children in non-NAP households will be issued P-EBT benefits.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan.¹

As part of the P-EBT administrative costs, the NAP proposes to reimburse schools and childcare facilities in return for data and reports of student records and attendance to achieve the processing of P-EBT benefits. The data from the schools and childcare centers would be most accurate for compiling data for benefit processing. As this process proves to be complex and causes administrative burden on the part of the school and childcare centers a fixed cost reimbursement is determined essential. The proposed reimbursement is \$10 per student record per month for 9 months for total estimated cost of \$1,050,390.

Additional administrative costs involved include system modification for \$60,000; printing of coupon benefits for \$50,000; outreach and advertisement for \$40,000; redemption agent services for \$100,000; \$50,000 for logistics; and (3) staffing for \$50,000 through September 30, 2021. Additionally, the NAP will utilize current staff to assist with coupon verification/validation protocols and benefit distribution process that would result in overtime compensation in the amount of \$100,000. As a result, the total proposed administrative costs for P-EBT is estimated at \$1,500,390.00.

Reimbursement of administrative work costs to schools and childcare facilities	\$1,050,390
System Modification	\$60,000

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

Printing of P-EBT coupon benefits	\$50,000
Outreach and Advertisement	\$40,000
Redemption Agent Services	\$100,000
Logistics	\$50,000
Additional Staffing (3)	\$50,000
Overtime Costs	\$100,000
Total	\$1,500,390

System modification requires a functionality for P-EBT where the collection of data will be based on household and eligible children and the eligibility of P-EBT benefits for each child as benefits may differ between groups such public school, private school, and child care. A household may have children consisting in each various groups. The data the NAP will receive should be validated from the CNP via a roster that will be uploaded in to the NAP eligibility system that will populate the required data fields in order to generate the appropriate benefits that will be issued to the applicant household.

Printing of P-EBT coupon benefits must have distinct design and look compared to the NAP coupons. Coupons must be distinctly distinguishable for easy identification and separation in order to properly count and verify P-EBT coupons against NAP coupons. Since P-EBT benefits have to be reported separately it is required the are coupons accounted for separately. It is estimated that P-EBT benefits would be around \$11,117,496.46 which consists of 469,789 coupon booklets.

Outreach and advertisement are very critical method for dissemination of P-EBT information and the application process. The simplest and quickest ways to get information out to the public is social media and news media which will be utilized. CNMI will coordinate press conferences and/or issue press releases regarding the P-EBT program. CNMI will need to print applications and info sheets, flyers, banners and posters which would require labor and cost.

Redemption Agent Services are services provided by a banking institution contracted by the NAP to perform disbursements to banks and retailers who are authorized to accept NAP/P-EBT coupons. All coupons issued out from the NAP are funneled to the NAP's Redemption Agent who accepts the coupon and processes disbursements. In addition, the Redemption Agent ensures the coupons were accurately processed, and performs weekly reporting and who surrenders the coupons to the NAP. The services for P-EBT benefits are currently not included in the Redemption Agent contract therefore services for P-EBT benefits will be a change order to the current contract.

For logistics, CNMI plans to set-up tents and tables outside of the NAP and CNP offices to issue and receive P-EBT applications. Additionally, cellular phone and airpods will be acquired for call center staffs.

Additional staffing will be needed to assist with coupon handling and distribution. We estimate three additional temporary staff to assist the NAP Benefit Issuance Unit. In addition, the work to verify and validate coupons is substantial, it is significantly time-consuming and meticulous process. The NAP will utilize internal staffing to perform these requirements which require overtime services and compensation.

- e. Tentative P-EBT issuance schedule.

CNMI plans to distribute P-EBT benefits via drive-thru distribution. The distribution plan to consolidate NAP households and non-households is still being evaluated. However, CNMI plans to issue benefits beginning June 2021 for P-EBT benefits covering the months of August 2020 to November 2020; in July 2021 for months covering December 2020 to March 2021; and in August 2021 for months covering April 2021 to June 2021.

- School children in SNAP households – drive-thru distribution
- School children in non-SNAP households – drive-thru distribution
- Children in child care – drive-thru distribution

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 for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.

The NAP will receive data from the CNMI Department of Education, Child Nutrition Program (CNP), the agency which shall receive all school information from the public schools, the private schools and childcare centers. The data provided to CNP will be certified by the respective school and/or child care entity and that the data covers for school year 2020-2021. From this certification the CNP and NAP is assured no data includes enrollment from school year 2019-2020.

- 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.

In 2018-2019 the CNMI transitioned to CEP (Community Eligibility Provision). Operating the CEP entitles every public-school child to a free breakfast, lunch

and snack when dining at a public-school cafeteria without being required to submit applications. Aside from the public schools, such as private schools and child care facilities, if a child was determined not free-meal eligible such child will be charged the reduced rate. Currently, the reduced rate is charged to most children in all private schools and childcare centers however no application is required to be submitted. These children can be identified from the data provided by the private entities. All CNMI school children and non-school children in child care facilities are eligible under the CEP which are treated in the same manner for P-EBT eligibility in accordance to their group status.

- 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.

The NAP and CNP presents the concept of a child officially enrolled in a school is a child entitled to a free meal or reduced price meal under CEP. CNMI will utilize a simplified assumption for each child's lack of access to meals at schools based on best feasible data by determining the children in groups such as public school group, private school group, and child care center group. To receive P-EBT benefits, the parent or guardian must submit an application and enlist the children in their household including the name of the institution each child is enrolled in and must indicate whether they are receiving NAP benefits by providing their NAP case record number. The applications will be verified by CNP against the rosters provided by the schools / child care facilities and will produce a validated roster submitted to the NAP which will be uploaded into the NAP database system. Using the system de-duplication functionality each child named on the CNP validated roster will be verified against the data in ongoing NAP program database. Through this process, a system verification will enable a report that will include data of whether a child is a NAP recipient or a non-NAP recipient.

- 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.).

P-EBT benefits will be retroactive to the beginning of SY 2020-2021 which will be based on rosters provided by the schools that will be reported per month. Benefits for child care facilities will be retroactive to October 1, 2020. In addition, student eligibility will be based on their assigned school group and simplified assumption. The rosters provided by the schools and child care facilities will include the school's in-person and virtual schedules which will be the reference to update and re-establish each child's eligibility. This information will be updated every month or report to be provided for each month that has passed.

- 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).

The State agencies involved with the CNMI P-EBT program are the DCCA Nutrition Assistance Program (NAP) and the State Department of Education Child Nutrition Assistance Program (CNP). CNP will be responsible for receiving school rosters, child care facilities, and P-EBT applications. In addition, CNP will validate each child's eligibility and consolidating the respective children with their respective

households. Overall, CNP will be responsible for confirming P-EBT eligibility who will provide NAP the final roster. The NAP will be responsible for issuing P-EBT benefits to eligible households. NAP will upload the roster in the NAP eligibility system, check for potential duplicates and resolve if any, generate the household's entitled benefit and distribute the P-EBT benefit via drive-thru at the NAP facility. NAP will generate reports and provide to CNP and FNS.

- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

The FFCRA, as amended, authorizes States to make simplifying assumptions and use the best feasible available data to identify school children, determine the operating of schools, and establish State or regionally based benefit levels. The CNMI make the simplifying assumption on feasible data by grouping children in three categories: public schools, private schools and childcare centers.

Private schools operate on varying hybrid school schedules. Child care facilities may also have varying schedules, however children in child care facilities must be members of a household receiving NAP benefits in order to be entitled to P-EBT benefits. As a result, CNMI determined as appropriate children in private schools and child care are to be in separate groups so a simplifying assumption would not be feasible if combined. Children in child care would be best suited to be grouped with public school children group. This is based on the reason of the location child care center that is in the same area of a closed school or that the school was operating with reduced days or reduced hours. Benefits for children in child care will be adapted to the public school schedule after first determining the requisites for children in child care. Pre-school children enrolled in a covered school facility shall be considered as school-aged children.

Public school children were entirely on virtual learning during the period September 8, 2020 through January 29, 2021, disparate from private schools in terms of school schedule. As appropriate, Public school children will be considered in one group. This includes children in Head Start, which is under the public school system, will be considered as school-aged children in public school. Children in Early Head Start will be considered as children in covered child care facilities.

An entity that has restored normal school schedule and has returned to 100 percent face-to-face learning will be excluded for P-EBT eligibility.

There will be two groups: 1. Public School children and Child Care Facility children; and 2. Private School children.

The simplifying assumption for group 1 (public school children) is that eligibility for P-EBT will be based on the public school system predominant school schedule. The simplifying assumption for group 2 (private school children) will be based on average virtual learning days for each respective school. The schedule for each private school may vary amongst each other, thus it would be expected the P-EBT eligible days for one private school would be different from another.

The simplifying assumption for children in child care will be based on the requisites the child is under the age of 6 and is/was a member of household who received NAP

benefits during October 1, 2020 to June 11, 2021. Children under this group will have P-EBT benefits similar to children in public schools, however the P-EBT benefits cover only for the months the household was an active NAP household during the period October 1, 2020 to June 11, 2021.

There are a total of 11,671 school and childcare children, an estimate of 6,288 in NAP households and 5,383 in non-NAP households. An average schedule will be determined per student group which will be used to derive the number of P-EBT eligible days per month. CNMI estimated that the total amount P-EBT benefits that will be issued for SY 2020-2021 is \$11,114,699. The rate of reimbursement per child will be \$7.97 per P-EBT eligible day.

A household filling out a P-EBT application may have a combination of children, such as one child enrolled in public school, another in private school, and a child in child care. The P-EBT entitlement for each child is anticipated to vary, but will be lumped in one household benefit for the entitled month. The program integrity is defined from the verification made and the validity of eligibility that will be performed by CNP.

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.

All CNMI schools and child care facilities have pledged to participate in providing data and information to CNP. The information shall include enrolled child name and the school or child care center schedule. The information will be provided in a report separated by months from each entity. In these reports, CNP will be able to identify, confirm and monitor the status of individual 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?

The geographic area of the CNMI is equal to a geographic area for a small county in State. While an executive order in connection with the Declaration of State of Public Health Emergency has been issued for school closures, the executive order apply to

all CNMI schools. On March 23, 2020, all schools were ordered closed to face-to-face learning which was eventually rescinded on August 13, 2020 for schools to safely re-open. However, all schools had a delayed start as their re-opening safety plans had to be approved by the CNMI Covid-19 task force. This delay lasted for two weeks. Schools had to start with hybrid schedules with limited attendance due to social distancing while instituting virtual learning at the same time. In particular, public schools were opening entirely on virtual sessions. CNMI confirms via executive orders that the child's school has been closed or was 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.)

As described in the paragraph above all schools have met the requisite of the minimum 5 consecutive days that the child's school has been closed or was operating with reduced attendance or hours. As the requisite has been met, CNMI is not required collect updated information from schools for this requisite.

- 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.

Several months have passed since the beginning of SY 2020-2021 with approximately two months remaining. CNMI's plan for monitoring changes will be based on the rosters provided by the schools and child care facilities which shall include schedules. The collection will be provided in respective months to the CNP who will determine the actual issuance amounts for each entity group. This can be defined to be monthly monitoring.

- 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.

The simplifying assumption CNMI proposes is to segregate children into groups, i.e. public school, private school, and child care facilities. CNMI justifies that children are best put into the prescribed groups because of the disproportion of school or day care center schedules. Eighty-three (83) percent of the eligible children population derive from public schools thus simplifying public school children in one group and eligibility determined based on public school schedule. Seventeen (17) of the population derive from private schools and child care facilities but due to disproportion with schedules, children in private schools will be grouped separate from children in child care facilities. Rosters will be provided to the CNP who will determine child eligibility and issuance amounts as proposed measures and in consideration as CNP being a responsible partner in the P-EBT project ensures program integrity would be met.

5. P-EBT for Children in Child Care

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 received SNAP benefits at any time since October 1, 2020.
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.

Public schools are situated on the three islands; Saipan, Tinian, and Rota. During a public health emergency designation, all CNMI schools were either closed or were operating with reduced attendance or hours for at least 5 consecutive days. This included child care facilities. Considering the small-scale geographic area within the three populated islands every child under the age of 6 in the CNMI reside near a school which was closed or was operating with reduced attendance or hours. This constitutes every child in the CNMI under the age of 6 shall be deemed enrolled in a child care facility under the FFCRA. Any child under 6 and is a member of a household receiving NAP assistance since October 1, 2020 will be considered a child eligible for P-EBT benefits under the Child Care Facility children group and their benefits similar to children in public schools but will be limited to months consistent with their monthly NAP certification.

- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

Any CNMI child under the age of 6 and is a member of a household receiving NAP assistance since October 1, 2020 would be eligible for P-EBT benefits under the Child Care Facility children group. This constitutes all children under the age 6 in the NAP database system will be considered as eligible for P-EBT benefits. However, the parent or guardian of such children will have to submit a P-EBT application to receive P-EBT benefits. If a household submits an application, they agree that the information they provide would be used for P-EBT program purposes. Applications are to be submitted to the NAP or the CNP office. Application information will be recorded in the CNP final roster which will be submitted to the NAP office. All child data provided in the CNP final roster will be verified against NAP recipient data to confirm the child's receipt of NAP benefits. Information received from CNP will not be disclosed in accordance with 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?

As described in the paragraphs above, every child under the age of 6 in the CNMI reside near a school which was closed or was operating with reduced attendance or hours. This constitutes every child in the CNMI under the age of 6 shall be deemed enrolled in a child care facility under the FFCRA. Any child under 6 and is a member

of a household receiving NAP assistance since October 1, 2020 will be considered a child eligible for P-EBT benefits under the Child Care Facility children group.

- 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?

This does not apply. Every child under the age of 6 in the CNMI reside near a school which was closed or was 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?

The executive orders mandated under the Declaration of State of Public Health Emergency covered all child care facilities in the CNMI.

- 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.)

Child care facilities must provide their enrollment roster with their hours of operation schedule to the CNP. CNP will provide a validated roster to NAP. The information provided in the roster will verified against NAP participant data. Information provided by child care facilities must be recorded on a monthly basis.

- 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).

The partners involved in P-EBT are the School entities, Child Care facilities, CNP and the NAP. The role of the child care facilities is to provide relevant information of enrolled children and their facility's hours of operation. CNP is responsible for receiving the information from the child care facilities and validating the child with CNP records and prepare a roster for NAP. Under the FFCRA, certain children under the age of 6 may not be necessarily be enrolled but are deemed as enrolled may not be listed by any child care facility roster. Under these circumstances, CNP must accept any child information who is under the age of 6 and include the child under the Child Care Facility children group. The role of the NAP is to verify whether the child is a member of a household who is receiving NAP assistance since October 1, 2020. If a child is confirmed to be member of an eligible household the child will be provided P-EBT benefits as appropriate. In addition, the role of the NAP is to distribute the P-EBT benefits to eligible households.

- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

CNMI proposes the simplifying assumption that all children under the age 6 who are members of an eligible NAP household and enrolled in the covered child care facility will be considered eligible under the Child Care Facility children group. Children deemed enrolled under the FFCRA will automatically be included whenever P-EBT is determined for the Child Care Facility children group.

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 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	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

Notes:

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

There will be two groups: 1. Public School children and Child Care children; and 2. Private School children.

The simplifying assumption for group 1 (public school children) is that eligibility for P-EBT will be based on the public school system school schedule.

The simplifying assumption for group 2 (private school children) will be based on average virtual learning days for each private school separately.

The simplifying assumption for children in Child Care will be based on the requisites the child is under the age of 6 and is/was a member of household who received NAP benefits during October 1, 2020 to June 11, 2021. Children under this group will have P-EBT benefits similar to children in public schools, however the P-EBT benefits covers only for the months the household was an active NAP household during the period October 1, 2020 to June 11, 2021.

There are a total of 11,671 school and child care children, an estimate of 6,288 in NAP households and 5,383 in non-NAP households. An average schedule will be determined per student group which will be used to derive the number of P-EBT eligible days per month. CNMI estimated that the total amount P-EBT benefits that will be issued for SY 2020-2021 is \$11,114,699. The rate of reimbursement per child will be \$7.97 per P-EBT eligible day. It must be noted, that the figures in the table below are estimates.

Group 1 – Public Schools (PSS)	
Total number of PSS school-aged children and child care: 9,765. PSS children were on 100% virtual learning from September 8, 2020 to January 29, 2021. Total number of P-EBT eligible days for this period: 67 days. Daily reimbursement: \$7.97.	September 8, 2020 to January 29, 2021 P-EBT eligible days: 67 <u>X daily reimbursement: \$7.97</u> \$533.99 <u>X school-aged children: 9,765</u> Cost: \$5,214,412.35 Cost per child: \$533.99 = \$534.00
PSS initiated blended learning on February 2, 2021 anticipated through to end of the school year June 11, 2021. Three (3) days of virtual learning per week. Total number of P-EBT eligible days for this period: 52 days. Daily reimbursement: \$7.97	February 2, 2021 to June 11, 2021 P-EBT eligible days: 52 <u>X daily reimbursement: \$7.97</u> \$414.44 <u>X school-aged children: 9,765</u> Cost: \$3,998,517.12 Cost per child: \$414.44 = \$414.00
Sub-total for Group 1	\$9,150,452.64
Group 2 – Private Schools	
Private schools have varying hybrid school schedules. For cost estimation purposes, CNMI determined that average virtual days for private schools is 3 days per week from August 10 to present. Total number of private school-aged children: 1,906. Average virtual days: Three (3) per week.	August 10, 2020 to June 11, 2021 P-EBT eligible days: 122 <u>X daily reimbursement: \$7.97</u> \$972.34 <u>X school-aged children: 1,906</u> Cost: \$1,853,280.04 Cost per child: \$972.34 = \$972.00
Sub-total for Group 2	\$1,853,280.04
Total	\$11,114,698.99

CNMI makes these two-tier simplifying assumptions due to the disproportion of operation hours or school schedules which is determined to be best appropriate.

Public school children were entirely on virtual learning during the period September

8, 2020 through January 29, 2021, a considerable difference from private schools in terms of school schedule. As appropriate, Public school children will be considered in one group. Children in Head Start, which operates under the public school system will be considered as school-aged children in public school. On February 2, 2021 the PSS instituted face-to-face learning for two days each week. Children in Early Head Start will be considered as children in a covered child care facility.

Private schools operate on varying hybrid school schedules. Similarly, child care facilities have various opening of center dates and distinctly children in child care facilities must be members of a household receiving NAP benefits in order to be entitled to P-EBT benefits. As a result, CNMI determined as appropriate children in private schools and child care are to be in separate groups and so a simplifying assumption would not be feasible if combined. Pre-school children enrolled in a covered school facility shall be considered as school-aged children.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

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.

Day #0	Coordination between NAP and CNP, collaborate on planning of P-EBT, finalize P-EBT application, finalize roster template, and procedures to process and validate data for eligibility and benefit. Meet with private schools and child care entities and request for data and provided to CNP. CNP begins consolidating and validate data. Discuss impact of P-EBT benefits with wholesalers. Collaborate with NAP printing agent for design of P-EBT coupons. Collaborate with NAP eligibility system vendor for system functionality of P-EBT data capture and benefit processing. Provide FNS draft plan for review. DCCA and DOE sign off on MOA and state plan.
Day #0	USDA approves CNMI P-EBT State Plan
Day #0	NAP initiates change orders for Printing Agent, Eligibility System Vendor
Day #1	CNMI issues press release of the P-EBT program and begins distribution of P-EBT applications. Public notice campaign begins.
Day #10	CNP receives updated school and child care facility rosters

Day #15	Approval of change order contracts
Day #16	Printing Agent begin printing of P-EBT coupons. Eligibility System Vendor begin work for system modifications
Day #20	CNP receives updated school and child care facility rosters
Day #30	Deadline for P-EBT applications.
Day #45	P-EBT coupons delivered to NAP. UAT for system modification of P-EBT functionality
Day #50	CNP receives updated school and child care facility rosters
Day #55	P-EBT system rollout
Day #60	CNP provides NAP of certified P-EBT roster
Day #75	NAP distributes 1 st batch of P-EBT benefits covering August 2020 to November 2020
Day #90	CNP provides NAP of certified P-EBT roster
Day #105	NAP distributes 2 nd batch of P-EBT benefits covering December 2020 to March 2021
Day #120	CNP provides NAP of certified P-EBT roster
Day #135	NAP distributes 3 rd batch of P-EBT benefits covering April 2021 to June 2021

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?

CNMI will issue P-EBT benefits on a unique P-EBT ID Card design. It will be issued to the parent or guardian of the P-EBT applicant household. The P-EBT ID cards will be issued to non-NAP households and ongoing NAP 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.

CNMI will coordinate the printing of P-EBT coupon benefits that is distinguishable from ongoing NAP benefits. Distinct design and color will be coordinated. This will help staff, recipients, retailers, and banks identify the difference between the two types of program benefit. This is important for retailers and banks who must segregate the two program types for making deposits separately. A P-EBT deposit ticket will be provided to retailers so they can separately deposit P-EBT coupons from ongoing NAP coupons. It is important this procedure is followed in order to properly record, report and maintain accountability for P-EBT coupons.

- 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.

The grant award for P-EBT that is expected to be issued to the CNMI will be accounted for separately and an account number designated in the ASAP. Expenditures that are approved under the state plan for P-EBT will be drawn down from the CNMI P-EBT

ASAP account. Similarly, expenditures for NAP and D-NAP will be drawn down from their respective ASAP accounts.

- 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.

CNMI will issue P-EBT benefits using P-EBT coupons. CNMI plans for the coupons to be valid from June 1, 2021 to December 31, 2021. This will P-EBT household recipients adequate number of days to use their P-EBT coupons. P-EBT coupons after December 31, 2021 will no longer be valid for use.

- 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?

P-EBT was not extended nor applicable to the CNMI for SY 2019-2020.

- 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?

P-EBT was not extended nor applicable to the CNMI for SY 2019-2020.

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.

- 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.

CNMI will be distributing P-EBT benefits retroactively based on the designated school and child care facility groups via simplifying assumptions. CNMI does not anticipate for issuance errors to occur as P-EBT benefits will be determined retroactively, however disputes or concerns may arise. CNMI will have a hotline at the NAP office to receive calls regarding P-EBT. Staffs will be designated and will be educated about the process of the P-EBT program. The staff will be trained on customer service and proper handling of disgruntled callers and to research and address the concerns or disputes.

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.

Schools and child care facilities are situated across the islands. P-EBT applications will be made available at each school and child care facility. The entities will be requested to make their offices available to the public to access a P-EBT application. Additionally, will be requested to refer or assist those seeking assistance by reaching the P-EBT hotline for accessibility assistance or translation assistance or disability assistance. Social security numbers will not be required to be collected for children.

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

CNMI will introduce the P-EBT program to the public initiated with a press conference and/or press releases will be issued to the media to print and broadcast. The press releases and advertisements will be posted on social media. School and child care facilities will be requested to disseminate information through their communication methods such as school bulletins, letters to parents/guardians and through their social media outlets. NAP and CNP will post P-EBT information on their websites and will reach out to their partnering agencies to share the information with their network.

- 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.

Application for P-EBT will be required. A simplified paper application will be available at the schools and child care facilities, NAP and the CNP office. This will help in consolidating children into their respective households and to prevent duplication of child data or benefits. A household who may be eligible but do not want the P-EBT benefit may decline receiving or submitting an application. Applications will have to be submitted to the NAP or the CNP offices.

- 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)

CNMI will provide an information sheet either a preface to the application or attachment to the application. The info sheet will contain a description of the P-EBT program, eligibility for P-EBT, how the benefits will be distributed, an explanation of where the benefits can be used and how benefits can and cannot be used, an explanation of violations and penalties, an indication that P-EBT coupon benefits are non-transferable, and information regarding a call center to call if they have questions.

- 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?

CNMI's public information campaign addresses the outreach to non-NAP households through press releases, social media, and school/child care facilities' bulletins and letters to parents. CNMI will provide P-EBT information to NAP households through the NAP newsletters issued monthly to households when receiving their NAP benefits. The NAP and CNP will post P-EBT information on their websites and social media.

9. Over-issuance of P-EBT benefits

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

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

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is

merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Application for P-EBT will be required in order to receive P-EBT benefits. All P-EBT applications will be consolidated at the CNP office in which CNP will verify application information against data/information provided by the schools and child care facilities with available CNP data/information to determine student eligibility, benefit amount and consolidating eligible children in their respective households. CNP will produce a certified list via a roster that will be submitted to the NAP for disposition of P-EBT distribution.

CNMI, via the CNP office, will be determining eligibility retroactively based on the designated school and child care facility groups utilizing simplifying assumptions. As a result, CNMI does not anticipate over-issuance of P-EBT benefits. However, CNMI does not rule out the possibility of administrative errors or improper payments. In the event such anomaly has been discovered, efforts by the CNMI should be made to adjust the next P-EBT benefits to reduce or increase, where applicable. In the event that no further benefits will be available to make the adjustment, the over-issuance must be handled administratively. A written notification must be issued to the affected household stating the reason of the claim and the amount of the claim, in addition to a notice to the household an appeals or fair hearing process must be accorded if they want to dispute the claim. In the event a hearing date is decided and held, the decision by the Hearing Officer will be considered final.

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.

CNMI agrees to comply with all applicable benefit issuance reporting 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, 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.

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, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

14. Administration of State P-EBT Plan

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

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

Signature
Print Name and Title

Signature
Print Name and Title

Date of Request: _____