

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 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 2020-2021

1. State: Iowa – Pandemic EBT for Schools Only

- 2. Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021

3. Executive Summary:

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

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
 - for children in school
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households

Response:

Iowa intends to issue P-EBT for children in school from Sept 2020 through May 2021. We estimate issuing up to \$15,686,000 in benefits to 115,000 children in SNAP households. For non-SNAP households, we estimate issuing \$21,080,000 to 155,000 children in non-SNAP

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

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

households. We anticipate the total issuance for September through May to be \$165,447,000.

To administer P-EBT as described in this plan, we anticipate \$394,000 in administrative funds would be required. These costs include system, phone, website enhancements along with additional staffing and Conduent costs. This does not include benefit issuance amounts.

Iowa will not differentiate between SNAP and non-SNAP households for issuance.

Iowa will issue benefits on a staggered schedule with the first issuance occurring in April. These dates should allow for no disruption to SNAP availability dates (1-10th), as well as help vendors that accept EBT.

School P-EBT Availability Date	
First Letter of Last Name	Date Benefits Are Deposited
A – B	11th day of the month
C – D	12th day of the month
E – G	13th day of the month
H – I	14th day of the month
J – L	15th day of the month
M – O	16th day of the month
P – R	17th day of the month
S	18th day of the month
T – V	19th day of the month
W – Z	20th day of the month

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:

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:

- directly certified or determined “other source categorically eligible” for SY 2020-2021, **or**
- certified through submission of a household application processed by the child’s school district for SY 2020-2021, **or**
- enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
- 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.

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

- 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.
- How will the State determine and/or confirm each child's eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child's lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child's in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- 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.

Response:

The Iowa Department of Education (DE), in coordination with public and nonpublic schools will be the agency responsible for determining eligibility. The Department of Human Services (DHS) will be responsible for providing oversight and guidance to DE, and issuing benefits.

Iowa Department of Education (DE) has developed a secure P-EBT system within our data collection infrastructure, Cedar Connect. This P-EBT system is available to all public and non-public schools in Iowa. This P-EBT system will allow each school to verify active enrollment for free and reduced price meal eligibility as well as the in-person and virtual days for students in their school. Each school will have secure access to this system and will only be able to submit and view data for their district or school. DE's Bureau of Information and Analysis Services (IAS) staff will review the data submitted by schools and will confirm the submitted data does not include 2019-20 graduates.

Schools will update student information through the Cedar Connect P-EBT system every month for the prior month following the initial data submission to ensure students remain enrolled in school and eligible for NSLP.

DE IAS staff will cross reference data provided through the P-EBT system with the Direct Certification list to capture SNAP versus. non-SNAP households.

DE will differentiate SNAP from non-SNAP students through comparison of the information reported in the Cedar Connect P-EBT data system with the Direct Certification lists provided by DHS.

PK-12 students eligible and approved to receive free or reduced-price meals in school year 2020-21 and who attend and are enrolled in an eligible school participating in the National School Lunch Program (NSLP) may be eligible to receive P-EBT benefits depending on attendance status (100% virtual, 100% in-person, or a hybrid learning model.) All public schools in Iowa participate in NSLP; nonpublic schools have the option to participate in NSLP.

Eligibility for free or reduced-price meals will be determined through either an approved free and reduced price meal application, direct certification, or attendance at a Community Eligibility Provision (CEP) school. Iowa will be using SY 2020-21 eligibility determinations. In addition, students eligible for free and reduced price meals in 2019-20 will be eligible for P-EBT benefits in September and possibly October 2020 due to the 30 day carryover of free and reduced price meal eligibility.

DE Bureau of Nutrition and Health Services (NHS) will provide a list of CEP schools/districts, as well as non-public schools operating NSLP, to the DE IAS. Student data from the Cedar Connect P-EBT system will be cross referenced. All eligible students must have a state student ID to be eligible for P-EBT. Students new to the State are assigned a student ID during the enrollment process and would be eligible for P-EBT benefits retroactively to the first day of enrollment if all other P-EBT student eligibility requirements are met (e.g., free and reduced price meal eligibility and reduced learning schedule.)

New students (kindergartners and transfer students) are reported in Student Reporting in Iowa (SRI) for school year 2020-21. Data will be reviewed by schools when reporting in the P-EBT reporting system. DE IAS staff will also cross reference all school data by state student ID to ensure correct student transfer information.

Iowa will make the Simplified Assumption that students who become newly eligible for free and reduced price meals during the school year would have been eligible the entire school year. Iowa will grant eligibility retroactively to September.

Iowa [Senate File 2310](#) requires all districts and nonpublic schools to offer accommodations for remote or online learning if a child, another resident of the child's residence, or one of the child's regular caretakers has a significant health condition that increases their risk of COVID-19. In addition, a proclamation issued this past July by Governor Kim Reynolds authorizes remote learning in additional instances, including when a parent or guardian voluntarily selects the remote learning opportunity from among options provided by the district.

Schools will report in the P-EBT system their planned group attendance status (100% virtual, in a hybrid model, or 100% in-person). Schools may update student records when actual attendance differs from the school's overall planned status. SNAP and non-SNAP recipients will be reported in the same manner.

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:

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.

School closures do not include weekends, or days when the school is

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

Response:

Iowa [Senate File 2310](#) requires all districts and nonpublic schools to offer accommodations for remote or online learning if a child, another resident of the child's residence, or one of the child's regular caretakers has a significant health condition that increases their risk of COVID-19. In addition, a proclamation issued this past July by Governor Kim Reynolds authorizes remote learning in additional instances, including when a parent or guardian voluntarily selects the remote learning opportunity from among options provided by the district. Iowa is making the simplified assumption that all public and accredited nonpublic schools in Iowa are eligible for P-EBT as the offering of virtual learning to all families meets the reduced attendance requirement.

Schools will report in the Cedar Connect P-EBT system their planned group attendance status (100% virtual, in a hybrid model, or 100% in-person) and number of eligible days by attendance status. "Planned group learning status" means the group of students at each school learning on a hybrid learning schedule will receive P-EBT benefits for the number of hybrid learning days (simplifying assumption 10 days); the group of students learning 100% virtually will receive P-EBT benefits for the number of virtual learning days (simplifying assumption 20 days); and, the group of students learning

100% in-person will receive no P-EBT benefits except for individual-level changes as described in the plan.

Schools will be expected to update information in the P-EBT system through Cedar Connect no less than monthly for the prior month after the initial data submission. Benefits will be issued retroactively. This will ensure the school status is accurate at the time of issuance.

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 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.

Response: [please use as much space as needed]

Simplified Assumption: Iowa will determine benefit level based on the school determination of 100% remote, 100% in-person or hybrid learning model. Schools must update this information in the file submitted to DE, which will occur monthly after the initial submission. Schools will be able to delineate to the student level for specific situations, such as a classroom requiring quarantine or a child choosing a specific schedule. The schools as the source of truth is the best

information available to the DE and DHS. Student-level data reporting is not required of schools. However, the Iowa Departments of Education and Human Services strongly encourage schools to make student-level adjustments consistently and when necessary to maximize the P-EBT benefits for eligible children.

Benefits will be issued for the school year 2020-2021 following a traditional school calendar, which averages 20 instructional days per month (using a September through May calendar), excluding holidays and scheduled breaks Issuance September through May will encompass the entire school year, including the month of August and those children who attend year around school. DHS and DE believe it would be a hardship to districts and schools to provide more precise data based on the transition and adjustments being made to learning schedules as a response to COVID.

100% Remote Students: A school calendar, which averages 20 instructional days per month be used as the basis to provide 20 days per month of P-EBT benefits to eligible students learning 100% remotely. (September through May).

Hybrid Learning Students: Students learning both in person and virtually will receive 50% of the days received by 100% remote students; 10 days per month based on the average number of instructional days. Schools will have the option to adjust the days per month in the newly developed P-EBT system through Cedar Connect if the remote learning model at the school varies from 50%.and P-EBT benefits will be adjusted. Research of hybrid day assignments at 10 large school districts determined that 10 days is a reasonable reflection of the actual number of virtual days. The vast majority of schools researched indicated two groups of students where each group attended two days a week. The fifth day of the week was either a virtual learning day for all students or in-person attendance alternating between the two groups every other week.

Iowa will reassess the updated school schedules beginning with March, 2021. Iowa Senate File (SF) 160 was signed into law on January 29, 2021. The law requires Iowa school districts, including preschool programs, and accredited nonpublic schools to provide parents and guardians with the option to send their children to school in-person full-time beginning February 15, 2020. Iowa will reassess the simplifying assumption for hybrid learning days for March 2021. Due to the SF160, a simplified assumption of average benefit days for hybrid learning schedules may no longer be needed beginning March 2021.

100% In-person Learning: Students learning in-person 100% of the time have daily access to school meals and are not eligible to receive P-EBT benefits. However, schools will have the ability to add the number of days students with a planned, in-person schedule have that change to virtual learning during school closures due to high positivity rates or inclement weather and when virtual learning continues.

Iowa is making the simplified assumption that a student determined eligible for P-EBT would have received breakfast, lunch and snack if they were in-person learning and will issue the daily benefit amount of \$6.82.

6. 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.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response:

DE will provide training to districts and schools upon approval of the plan.

Public notice campaign and DE hotline (call center) opens one week prior to initial issuance

Iowa’s timeline for issuing benefits (Iowa will not distinguish between SNAP and non-SNAP HH for benefit issuance):

Eligibility Dates	DE provides data to DHS	DHS Issues Benefits
Sept 2020 – Dec 2021	April 15	May 11-20
Jan - March 2021	May 15	June 11-20
April and May 2021	June 2	July 11-20

Iowa’s initial timeline for issuing benefits was discussed with Conduent and the Department of Education. Since the initial submission of this plan, it has been determined that the initial timeline cannot be met. Please see adjustments to the chart above with the new timelines and issuance schedule.

P-EBT benefits will be issued on a Conduent determined unique card design. This card will be issued to all eligible students, regardless of SNAP receipt, or if a P-EBT card had been issued for the 19-20 school year. DHS will cross-reference DE data with SNAP eligible students to distinguish between SNAP and non-SNAP households.

Iowa will handle expungement for P-EBT the same as SNAP benefits.

Cards returned to Conduent will be destroyed. Clients in need of a new card will be able to contact the Conduent customer service center if they do not have a new address. If an address change is necessary, Conduent will direct the participant to contact the Income Maintenance Customer Service Call Center (IMCSC) at DHS. Callers to DE requesting a replacement card, will be referred to either Conduent or IMCSC as appropriate.

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.

USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the

States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different from the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

P-EBT information for the general public will be shared through DE and DHS press releases, social media and websites. Iowa will provide the same information to SNAP and non-SNAP households about P-EBT. For P-EBT recipients (also available to the general public), a

robust Q&A will be available on DE and DHS websites to address frequently asked questions such as how to access benefits, where benefits may be used, and for what purchases. Guidance will also be provided to eligible households who receive a card, but have determined they do not want the benefits.

Cards mailed by Conduent will include a buck slip which will provide general card information.

DE will be the initial point of contact for eligibility or issuance amount inquiries, and will notify DHS when they believe an error has occurred, or have specific questions regarding eligibility. DE will be available Monday – Friday 8a – 4:30pm. Callers will have the option of leaving voicemail. Conduent will be the point of contact for replacement cards, unless an address has been changed, then DHS will reissue the cards. Conduent is available 24 hours, 7 days a week. DHS is available, Monday – Friday 7a – 6p.

DE will have dedicated staff available to assist callers with P-EBT inquiries and work directly with schools to resolve concerns.

DHS, DE and Conduent all have access to translation services for persons with limited English proficiency.

The telephone number will be 515-281-5294; select option 1 for P-EBT. The number and P-EBT option will be activated near the date of initial card issuance.

A language translation telephone service will be accessed, as needed. Homeless and foster students are included on the direct certification list for schools to access and report P-EBT eligibility. School homeless liaisons will be informed of the P-EBT program. Schools will receive training and written guidance on implementing the P-EBT program. Ensuring correct student addresses and routinely checking the direct certification lists will be highlighted in written guidance and during these trainings.

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.

Response:

DE validates all data and submits only students that are qualified for P-EBT based on free and reduced lunch eligibility. Students will be un-duplicated in the DE file submitted to DHS, as confirmed by the unique student ID. Benefit amount will use a traditional school calendar (not including regularly scheduled holidays and/or breaks), and only for the \$6.82 rate allowed for the date the student is determined eligible.

DE will have dedicated staff to research any inquiries needing follow up with the applicable school, and each case will be handled individually. If benefits were under-issued, DE will consult with DHS to ensure the student receives the correct amount of benefits. Iowa does not intend to file claims due to over-issuance.

9. Benefit Issuance Reporting

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

10. Administrative Funding

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

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary

Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

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

11. Release of Information

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

12. Civil Rights Statement

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

13. Administration of State P-EBT Plan

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

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

Amy J Williamson

Signature
Amy J Williamson, Deputy Director

Signature
Print Name and Title

Date of Request: _____