

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

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

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

*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:** Florida
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***<sup>1</sup> 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
  - for children in child care
- b. Estimated monthly and total ***amount*** of P-EBT benefits the State will issue within this plan/amendment's date range.
  - Estimated amount issued to school children in SNAP households.
  - Estimated amount issued to school children in non-SNAP households
  - Estimated amount issued to non-school children in child care
- c. Estimated total ***number*** of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
  - Estimated number of school children in non-SNAP households
  - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
  - School children in SNAP households
  - School children in non-SNAP households
  - Children in child care

### **Response:**

- a. Florida will operate a PEBT program that covers school days that occur on or after August 1, 2020 through June 30, 2021.

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

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

- b. Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range. Monthly amount for August (10 days) \$84,524,011.00; Monthly amount for September (20 days) \$169,048,022.00; Monthly amount for October through May (20 days) \$110,748,616.00; and Monthly amount for June (7 days) \$38,762,015.60. Total program benefits amount (11 months) \$1,178,322,976.60
- Estimated amount issued to school children in SNAP households.
    - August \$31,549,047.20 monthly,
    - September \$63,098,094.40 monthly,
    - October through May \$41,309,285.60 monthly,
    - June \$14,458,250.00 monthly.
    - Total program \$ \$439,579,676.40
  - Estimated amount issued to school children in non-SNAP households
    - August \$52,974,963.80 monthly,
    - September \$105,949,927.60 monthly,
    - October through May \$69,439,330.40 monthly,
    - June \$24,303,765.60 monthly.
    - Total program \$ \$738,743,300.20

NOTE: Estimates are based on enrollment in innovative and virtual platforms in Fall 2020 by school and allocated to SNAP or non-SNAP recipient based on 2019-2020 School Year actual allocations.

- c. Estimated total **number** of children to which the State will issue P-EBT benefits. 1,239,355
- i. Estimated number of school children in SNAP households 462,596
  - ii. Estimated number of school children in non-SNAP households 776,759
- d. Estimated total amount of administrative funds the State needs to complete the plan will be provided in the state's FNS 366(a).
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- i. School children in SNAP households
    1. April 2021 (August – December)
    2. June 2021 (January -March)
    3. August 2021 (April – June)
  - ii. School children in non-SNAP households
    1. April 2021 (August – December)
    2. June 2021 (January -March)
    3. August 2021 (April – June)

Florida will reach out to the Florida Retailers Association to communicate our rollout plan.

#### 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.
- 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:** [please use as much space as needed]

Implementing PEBT in Florida will require the input and cooperation of a number of state agencies, including the Department of Children and Families (DCF), the Department of Education (DOE) and the Department of Agriculture and Consumer Services (FDACS). The following

paragraphs outline the key players and processes necessary to identify eligible children in eligible schools and issue benefits.

Florida will build on the existing processes that identify and record student eligibility for free or reduced-price meals, which includes the Direct Certification process. Currently, DCF provides nightly data on clients newly eligible for SNAP, TANF and Medicaid to the FDACS. FDACS also receives enrollment data from local schools/school districts that participate in the National School Lunch Program. FDACS compares DCF program eligibility information with the school enrollment data, directly certifies students for free or reduced-price school meals and returns the eligibility information of the matched students to their participating school/school district. This information, in addition to eligibility determination from SY 2019-2020 (with names removed of students who have graduated or withdrawn from school) and new eligibility determinations that have been made by Florida schools/school districts via household income eligibility applications will be used to identify eligible students. **Note: SY 2019-2020 records will be overwritten with any SY 2020-2021 direct certification or application data for free or reduced-price meals, if available.**

DOE will collect enrollment data from each school district (including charter schools) and from private schools with demographic information for each student eligible for free or reduced-price meals. The file will include the number of days each student is enrolled in an innovative program for public schools, or in a distance learning program for private schools, for the reporting period. Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning status is captured before issuing benefits.

Data collected will include:

- Student name
- Parent/Legal Guardian name
- Mailing Address
- School of attendance
- County
- Days enrolled in innovative programs or distance learning due to COVID **and therefore not physically present to have access to meal service**

*Note: Social Security Numbers and Date of Birth will be collected when available to match to SNAP data but is not required for eligibility.*

DOE will transmit the data to DCF. DCF will compare eligible clients to SNAP recipient data to identify, where possible, clients with active SNAP payments. Clients currently receiving SNAP (or TANF) will receive PEBT benefits on their existing card. Text blasts and/or emails will be used to notify SNAP recipients that benefits have been added to their SNAP cards if text numbers or emails are available.

Clients not identifiable as receiving SNAP will receive a new card. Florida will issue PEBT benefits in the same manner as the issuance for the 2019-2020 school year and where possible will issue one card to the household with multiple students. If Florida is unable to identify students within the same household, then a card will be issued for each child. Demographic information regarding this group will be sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance.

Data will be provided from the schools in the following intervals:

- August – December 2020 April 9<sup>th</sup>
- January – March 2021 May 15<sup>th</sup>
- April – June 2021 July 30<sup>th</sup>

## B. School Status

### *Standard for P-EBT Eligible School Status*

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

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

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

The Florida Department of Education (DOE) approves school district education plans, including plans to comply with the Commissioner of Education's Executive Order relating to COVID-19. Each school district is required to have an approved plan that identifies opportunities for students to participate in education through attendance at a traditional school setting or to participate

through distance learning as a result of COVID-19, known as “innovative” programs. Innovative programs may include both a fully virtual and a small number of hybrid learning models. DOE will collect information from school districts on students eligible for PEBT which will be defined for public schools as students who are (1) directly certified for free or reduced-price meals; (2) eligible for free or reduced-price meal benefits through a household income eligibility application with the school/school district or (3) enrolled in a Community Eligibility or Provision 2 school AND are also enrolled in an innovative or hybrid program.

FDACS will provide to DOE a list of schools that are eligible PEBT based on their participation in the National School Lunch Program the week prior to each data collection period with start date annotations as NSLP participants are accepted on a rolling basis annually. DOE will request the same information required of public schools from private schools to identify students who meet the criteria for eligibility. FDACS will train the school nutrition staff and DOE will train the IT staff of school districts, PNP and Charters on the school and student eligibility prior to the first data submission.

School districts and private and charter schools will be required to submit certification to DOE that they have met the requirement of having been closed or operating on reduced hours or reduced attendance for 5 consecutive days. DOE will forward to DCF data on schools from districts that have provided certification.

## 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.
- How will the State determine and confirm the child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child’s residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is **not** in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child’s eligibility? Specifically, how will the State determine that:
  - the child’s child care facility is closed or is operating with reduced attendance or hours, or
  - the child’s child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?



- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

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

## 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	<b>\$6.82</b>
Alaska	5.79	3.64	1.56	<b>10.99</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	<b>7.97</b>

#### 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]



Students will be issued benefits equal to the daily federal reimbursement rate for a breakfast, lunch, and snack for school year 2020-2021 as specified by USDA. The benefit in Florida, which is \$6.82 per student, is multiplied by the number of school days that each student was enrolled in an innovative program in a qualifying school or in an eligible hybrid program.

Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning status is captured before issuing benefits. As some upper level students may participate in some regular and some distance-learning courses, Florida seeks to use a simplifying assumption that allows students to be considered eligible for PEBT for each day they are enrolled in an innovative course during the reporting period.

DOE will provide a list of students from the reporting period and the number of days of eligibility for PEBT benefits. DCF will calculate the benefits based on that data.

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

Florida will issue PEBT benefits in the same manner as the issuance for the 2019-2020 school year, including the same card stock available from the state's vendor. DCF has identified a benefit type, coded as FSDDEF, which is distinguishable from DSNAP benefits.

For individuals who receive both SNAP and PEBT benefits, spending priority defaults to PEBT benefits first and PEBT expungement periods follow SNAP expungement periods. PEBT cards returned to the vendor as undeliverable will be de-activated, with a status of "Undeliverable", and destroyed. Customers requiring replacement cards may contact the vendor and confirm or update the address to have the cards re-issued.

- Day 1—State Plan is approved.
- Day 8 – DOE notifies school of reporting criteria
- Day 40 – Reporting deadline for file submission by school districts to DOE
- Day 55 – DOE transmits data to DCF
- Day 70 – DCF submits data to PEBT card processor
- Day 71– August through December benefits available for existing SNAP clients, On-line inquiry system launched and call center open
- Day 72 – August through December Benefit cards mailed for non-SNAP recipients
- April 30<sup>th</sup> – January through March data submitted to DOE
- June 30<sup>th</sup> – January - March benefit payments
- June 30<sup>th</sup> – April – June data submitted to DOE
- July 30<sup>th</sup> – April -June benefit payment

Florida is working and communicating with its EBT vendor on the implementation timeline for PEBT 3.0. We have already ordered the additional white card stock and are in the process of completing a change order. Florida is also in the review process of a contract amendment to implement PEBT 3.0.

## 7. Customer Service

### *Recommended Standard for Household Support*

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

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

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., **not directly** to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide **directly** to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
  - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
    - A description of P-EBT
    - Instructions for PINing a P-EBT card
    - Explanation of where benefits can be used
    - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
    - Explanation of violations and penalties, such as trafficking
    - An indication that benefits are non-transferable
    - Instructions for destroying the card, if they want to decline benefits
    - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
  - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?

- Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

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

Florida will deploy a web portal to allow individuals who believe they should have received benefits to register their concern. This will collect demographic information, the school the student attends, learning mode (in-person or virtual) and information on qualifying public benefits or if the individual has been determined eligible for free or reduced-price meal benefits at the local school. Individuals will also be able to register these concerns via a call center if they are unable to access the web portal. Once the web-portal address has been developed and the customer call center phone number established, Florida will provide the contact information to FNS' Southeast Regional Office.

Requests will be transmitted to DOE, who will provide the information to local schools/school districts to resolve benefit eligibility issues. Once verification of school status has been made by the school/school district or eligibility is determined by DCF, schools/school districts will be asked to submit supplemental lists of eligible students. Supplemental issuance will be processed through the same process as original issuance.

#### **Access Issues:**

P-EBT eligibility through automated data match limits the potential access issues. Homeless individuals may identify a safe address for receiving their card if one has not previously been provided. Those with limited English proficiency will be able to use an interpreter through call centers and mailings will be provided in both Spanish and Haitian Creole. Individuals with disabilities will be served in the same manner in which the agency currently serves SNAP participants that require additional assistance.

#### **Public Information Campaign**

The State will conduct a public information campaign to alert those receiving benefits of the purpose of P-EBT and how it is to be used. This will include postings on DCF's web site, social media, and notification to community partners.

#### **Information to P-EBT participants**

Non-SNAP participants will receive a mailing with the following information

- A description of P-EBT
- Instructions for PINing the P-EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., only to purchase food 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 and the DHS website with frequently asked questions
- Phone number for the EBT processor for replacement card requests

SNAP participants may receive similar information via email or text if they have provided email addresses to the Department of Children and Families.

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

If an over-issuance is identified, the DCF will cancel the case and the card and stop subsequent benefits. In no instances will DCF reclaim P-EBT benefits by reducing a household's SNAP benefit, however, if a review of a PEBT case provides information of inappropriate issuance on a SNAP case (such as a non-custodial parent claiming custody for SNAP purposes), the SNAP case will be referred to the Public Benefits Integrity program for appropriate action.

## **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:**

[Taylor N. Hatch](#)

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Taylor Hatch, Assistance Secretary for Economic Self-Sufficiency  
Department of Children and Families

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Lakeisha Hood, Director, Division of Food, Nutrition and Wellness  
Department of Agriculture and Consumer Services

**Date of Request:** \_\_\_\_\_