

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
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>

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

1. State: Kentucky

2. **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act

3. **Executive Summary:**

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

- a. The *date range* covered by this State plan or amendment.
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.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:

Kentucky proposes to update its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from October 1, 2020 through June 30, 2021.¹ The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The best estimate of P-EBT issuance during the date range coverage period are as follows:²

- Monthly issuances of \$73,656,000. (total number of students from spring

2020 issuance multiplied by \$122.76; \$122.76 is the average of the fully virtual rate and hybrid rate; logic determined using average statewide fully virtual months (6) and (2) hybrid months)

- Estimated monthly amount issued to school children in SNAP households is \$30,690,000.
- Estimated monthly amount issued to school children in non-SNAP households is \$42,966,000.
- Total issuance of \$589,248,000. (monthly estimate multiplied by the eight months remaining in the 2020-2021 school year)
- Estimated total amount issued to school children in SNAP households is \$245,520,000.
- Estimated total amount issued to school children in non-SNAP households is \$343,728,000.

The estimated total *number* of children to which the State will issue P-EBT benefits (based on spring 2020 figures) is approximately 600,000.

- Estimated number of school children in SNAP households is 250,000
- Estimated number of school children in non-SNAP households is 350,000

The estimated total amount of administrative funds the State needs to complete the work described in this plan is \$5,234,729.

The state intends to begin issuing P-EBT benefits retroactively for the months of October 2020 through February 2021 within 25 days of plan approval. The October 2020 benefit month will be issued first. Benefits for November 2020 through February 2021 will be issued every 2 weeks until all have been issued. March 2021 benefits will be issued on April 25th. April 2021 benefits will be issued on May 25th, and May benefits will be issued on June 25th. This model of staggering benefits was created as a result of conversations with The Kentucky Grocers Association, retail partners, and community advocates.

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.

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, **or**
 - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, **or**
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or**
 - d. directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 **and** the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP- recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in- person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

Response:

The following entities are involved in the administration of P-EBT:

The Kentucky Department for Community Based Services (DCBS) is responsible for the issuance of P-EBT benefits, as well as the issuance of P-EBT cards and replacement cards, notices to clients and provision of customer service and support.

The Kentucky Department for Community Based Services, in collaboration with the private schools, is responsible for eligibility determination through the NSLP application process.

The Kentucky Department of Education (KDE), in collaboration with the local school districts, is responsible for eligibility determination through the direct certification process and the NSLP application process. DCBS will monitor and collect district level learning mode classifications.

To identify eligible school children and confirm their eligibility, Kentucky will use data provided by the school districts directly from the statewide student information system. Local school districts with non-CEP schools are required to process free and reduced lunch applications at the non-CEP schools to confirm student eligibility if they have not already done so for school year 2020-2021 due to operating SSO or SFSP. All students at CEP schools are eligible and will be provided the benefit. Once a student is confirmed to be free or reduced price, they are deemed eligible for the entire school year. Students will not be considered eligible if they are no longer enrolled in an eligible Kentucky school during a given month and will be removed from the list and no longer receive the monthly benefits until they are re-enrolled in an eligible Kentucky school.

A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school. Public school districts are required by the state to track a student's learning mode (i.e. remote, hybrid or fully in-person). For the purposes of P-EBT, private schools who administer NSLP will be required to track a student's learning mode and provide that information to DCBS. A student's learning mode classification will confirm their access to meals at school and P-EBT benefit level. The state intends to leverage simplifying assumptions to issue benefits by applying the same instructional status to all students at a school and to apply only two benefit amounts, one amount for hybrid students and one amount for fully remote students (more details are provided in the Benefit Level section) when determined necessary.

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]

Kentucky will identify, confirm and monitor the status of individual school districts through monthly reporting from school districts to DCBS through an online survey process. KDE and DCBS will provide guidance to each district on how to classify and report a district’s instructional method. The school districts that were confirmed P-EBT eligible through the approval of our September 2020 P-EBT plan have not resumed fully in-person instruction based on recommendations made by the Governor and the Department of Health. At the time of this plan submission, no public or private school district is operating fully in-person. For future consideration, districts or schools operating fully in-person may report eligible students when learning modes become remote.

Please see the state’s intended use of simplified assumptions outlined below in the “Benefit Levels” section.

5. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast and a lunch for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	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.

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

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

Response: [please use as much space as needed]

In an effort to reduce burden to school districts, streamline processes, and more easily communicate to recipients and stakeholders, Kentucky intends to utilize simplifying assumptions to provide a uniform benefit to all eligible students. These simplified assumptions were developed by DCBS and KDE in partnership with the state's P-EBT Advisory Committee, comprised of school district officials derived from a diverse pool which accurately represents the state's public and private school population. The state will issue P-EBT benefits in two distinct amounts:

- One amount for students enrolled in a fully remote learning model (inclusive of students whose school district is operating an in-person or hybrid model but the family opts into fully remote learning); and
- One amount for students enrolled in a hybrid learning model.

While information gleaned during meetings with the P-EBT Advisory Counsel was used to develop a preliminary plan and identify necessary steps, data from each school district will be collected to determine eligible benefit levels. A uniform process will be used for all students (SNAP recipients and non-SNAP recipients) to confirm each student's lack of access to meals at school. Public school districts are required by the state to track a student's learning mode (i.e. remote, hybrid or fully in-person). For the purposes of P-EBT, private schools who administer NSLP will be required to track a student's learning mode and provide that information to DCBS. A student's learning mode classification will confirm their access to meals at school and determine the P-EBT benefit level. The state intends to leverage simplifying assumptions to issue benefits by applying the same instructional status to all students enrolled in a particular school district based on the district's responses to an electronic survey. The survey will collect the following:

- The predominant learning model (in-person, fully-virtual or hybrid)

The State will begin collecting this information via an electronic survey in February (for the months of October through January), in April (for the months of February and March), and in June (for the months of April through June). If a school operated fully in-person in a given month, the students enrolled in that school will be ineligible for P-EBT, but may (re)gain eligibility at any time if:

- The student is enrolled in a fully-virtual learning model verified via the reconsideration process; and/or
- School-wide learning models change. In this instance, DCBS will request that the districts provide updates to instructional modes as they become known.

The State will collect the predominant learning method at the district level because a more refined process based on children’s individual learning models is not administratively feasible and unnecessarily delays providing P-EBT benefits to Kentucky’s students who have lost access to schools meals due to the COVID-19 pandemic.

Using data derived from the P-EBT Advisory Council and communication with other school districts operating hybrid learning models, the State determined that a 3-day per week average hybrid benefit is a reasonable reflection of hybrid schedules across the state for October through February. Currently, there are two different hybrid school schedules utilized by Kentucky schools. These schedules are:

- 2 days in-person; 3 days fully virtual per week; and
- Rotating weekly-5 days in-person, 5 days fully virtual

The hybrid benefits is calculated by dividing the total virtual days/month by $\frac{3}{5}$ resulting in 12 hybrid days per month. Kentucky will continue to monitor district instructional learning models and revise the hybrid benefit calculation, if needed.

DCBS will establish a “reconsideration” process for households of children whose individual schedules justify a higher benefit than their district’s default method:

- Households may contact DCBS call services to submit an electronic request for reconsideration. The request must include their school’s contact information to verify their claim; DCBS will review the request and confirm free or reduced price eligibility before issuing an adjusted benefit.

In Kentucky, there are 172 public schools districts comprised of more than 1,355 individual schools of which approximately 90% are CEP. Statewide public school enrollment currently exceeds 702,000 students. To date, all schools within a given district are operating under comparable instructional methods as determined by the state’s P-EBT Advisory Committee and communication with other school district officials derived from a diverse pool which accurately represents the state’s public and private school population. District level data provides an accurate learning model assumption that may be applied to the majority of each district’s students making the cumbersome collection of school-level data unnecessary. Collecting predominate learning models at a district level alleviates burden to under-staffed school districts already taxed with unforeseen pandemic-related measures and allows the state to administer P-EBT funds to our most vulnerable population in a more timely manner. The fully remote benefit amount is calculated using the actual instructional days (October 2020 through February 2021) and anticipated instructional days through the end of the school year, taking into account holidays and scheduled breaks:

- October: 22

- November: 19
- December: 17
- January: 20
- February: 20
- March: 23
- April: 20
- May: 20

The total of 161 instructional days is divided by 8 (the number of instructional months), equaling an average of 20 instructional days per month. Kentucky believes using 20 days to calculate the fully remote amount best reflects the circumstances of all students. This allows the state to issue one consistent benefit of \$136.40 per month, alleviating household confusion and thus reducing inquiries to DCBS's assistance line.

The hybrid benefit is calculated by dividing the total virtual days/month by 3/5 resulting in 12 hybrid days per month. Issuing P-EBT benefits for 12 days provides a total monthly allotment of \$81.84 to each student enrolled in a hybrid learning model. Kentucky will continue to monitor district instructional learning models and revise the hybrid benefit calculation if needed.

To account for the fluid nature of the pandemic and that a school's instructional model may change mid-month, the state will issue benefits retroactively using the instructional method(s) identified by the school district. Furthermore, students who become eligible for P-EBT mid-month will receive benefits equal to the instructional method utilized at the school on the last day of the month of new eligibility.

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: [please use as much space as needed]

Kentucky intends to begin issuing P-EBT benefits retroactively for the months of October 2020 through February 2021 within 25 days of plan approval. The October 2020 benefit month will be issued first. Benefits for November 2020 through February 2021 will be issued every 2 weeks until all have been issued. March 2021 benefits will be issued on April 25th. April 2021 benefits will be issued on May 25th, and May benefits will be issued on June 25th. The feasibility of this will depend on the date of plan approval. The tentative approach is as follows:

Day 1 – Plan approval is received. Inform school districts, community partners, and advocacy groups.

Day 25- Initiate file transfers to EBT processor FIS, notice production begins and public awareness campaign commences.

Day 25–Clients are notified via social media, press releases, messages on the state's IVR system, and online publications.

Kentucky issues SNAP benefits on a cyclical schedule through the 19th of the month, issuing P-EBT benefits on the 25th of the month allows retailers to better support consumer needs.

The state intends to follow the same distribution model utilized during the initial round of P-EBT. Direct certification SNAP households will receive P-EBT benefits on their EBT card while all other newly approved students will receive benefits on a unique P-EBT card. P-EBT benefits will follow the same expungement rules that the state follows for SNAP. New P-EBT cards will not be issued to students who were previously issued a P-EBT card. For families whose card has been lost or damaged, the FIS automated service

line can reissue cards. DCBS Customer Service Line can change addresses and reissue cards when the address is no longer valid. The state will continue the use of the PEBTSN and PEBTOT benefit codes previously used for P-EBT. Currently the P-EBT draw/spend priority is first. Undeliverable cards will be returned to FIS who updates the online card portal with this information.

7. Customer Service

Recommended Standard for Household Support

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

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

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

Response: [please use as much space as needed]

DCBS has a multi-faceted approach to ensuring robust and accurate communication to all eligible households regardless of primary language, lack of permanent address or access to technology. The Customer Assistance Line will continue to serve as front line customer support. To aid field staff in assisting callers, DCBS has added a P-EBT inquiry screen within the eligibility system to allow field staff to specifically investigate a child's P-EBT eligibility, benefit amount, and card issuance status. Additionally, a specific Microsoft Teams group has been created to assist field staff with issues when they cannot easily be resolved. A dedicated team will monitor this group and problem solve issues utilizing the records provided by the school districts. The group will also complete address changes and issue replacement cards upon request.

DCBS and KDE are committed to equitable access for all eligible families regardless of circumstances. To address issues related to families who have not received their cards due to lack of permanent address, school districts may choose to serve as the mailing address for these families. Should schools elect this option, program integrity safeguards have been built into this arrangement. Families will need to sign an attestation that they received the card and at the end of the school year the school district will be required to submit to DCBS the signatures and any cards that were not picked up. DCBS will continue the collaboration with field offices that was established during the first round of P-EBT to ensure P-EBT cards are issued to the current address for foster children. Social Security Numbers (SSN) are not necessary to apply for NSLP and are not required to receive P-EBT.

Kentucky is committed to serving all eligible children regardless of primary language.

Public Awareness Campaign: The state will conduct a public information campaign through use of websites and social media platforms. Kentucky intends to issue a press release in English and Spanish to target state-wide and local news organizations. The state will work with schools and community organizations to develop template emails and flyers.

Direct Communication: A notice will be mailed to all recipients upon initial benefit issuance in February. The notice will include an explanation of P-EBT, eligibility for the program, benefit amounts, issuance cycles, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions and how to opt out. It will also include information on where to go for step-by-step instructions on how to PIN their card and what to do if they do not want to use the benefits and how to reach the DCBS Customer

Service Line with other questions. The notice will be mailed upon new approvals for P-EBT if the student becomes eligible after the initial statewide issuance date. The notice will be available in English and Spanish and is accompanied by DCBS's translation card comprised of twenty languages. DCBS will also create an informational video in American Sign Language that will be shared on the department's website.

DCBS will create flyers, template email language and sample social media posts and graphics in multiple languages. These outreach materials will be shared with schools, community organizations, and sister agencies.

DCBS will build a replacement card portal on the Self-Service Portal website. Instructions on how to PIN a P-EBT card and request a new card will also be available in English and Spanish. DCBS will collaborate with the EBT processor, Fidelity Information Systems (FIS), to frontload a P-EBT specific message on their pinning hotline.

8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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

Response: [please use as much space as needed]

Claims will be pursued through the Department's direct billing approach. In consideration of the fact that households will receive benefits without application through an automated match process, the state is proposing to treat each child as a household of one. This will allow for equitable treatment across SNAP and non-SNAP clients as DCBS does not have household level data on non-SNAP households. Furthermore, this approach allows the Department more time to identify and rectify eligibility issues before reaching the \$600 claims threshold. Kentucky believes issuing benefits retroactively will prevent erroneous issuances entirely and we expect claims establishment only in rare circumstances, if ever.

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:

Signature
Marta Miranda-Straub
Cabinet for Health and Family Services Commissioner

Signature
Dr. Jason Glass
Kentucky Department of Education Commissioner

Date of Request: _____