

**State Plan for Pandemic EBT: Children in School
School Year 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. (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:** Minnesota

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:

- a) The date range for this plan: September 1, 2020-September 30, 2021
- b) Estimated benefits issued:
 - Monthly: \$39,385,500.00
Total amount: \$372,849,400.00
These estimates reflect the revised daily rate of \$6.82 and anticipate half the eligible student body will be distance learning for the entire 2020/2021 school year and that the other half of the eligible student body will be in a hybrid model for the entire school year. We are currently waiting on schools and districts to verify learning model data. A generic statewide calendar is attached to demonstrate instructional days. The end date of June 11 is based on the operations of the largest districts in the state.
 - Minnesota's program will run P-EBT as a new program, SNAP and Non-SNAP households are not differentiated. We anticipate 46% of the funding to go to SNAP households based on our experience with PEBT 1.0.
- c) Estimated total number of school children: Last year's estimate of eligible students in Minnesota was 350,000. We anticipate that more students in the state qualify for free and reduced lunch this year due to the economic conditions caused by the COVID 19 pandemic. We have estimated an increase of 10% to the NSLP student population to reach 385,000. Numbers are estimated, any significant

increase or decrease in estimated children will be shared with USDA as soon as known.

- Minnesota will run P-EBT as a new program
 - SNAP and Non-SNAP households are not differentiated. Based on Minnesota's experience with PEBT in the spring, we anticipate that 46% of the students served (177,100) will be from families participating in SNAP.
- d) Estimated total amount of administrative funds: \$6 million, from October 1, 2020-September 30, 2021. Costs include PEBT 2.0 portal, EBT vendor costs, Staffing and School Support.
- e) Tentative issuance schedule:
- 2021: March, April, May, June, July(partial issuance), and September(only if pandemic school learning model is necessary)
 - Minnesota will run P-EBT as a new program, SNAP and Non-SNAP households are not differentiated.

Minnesota's PEBT 2.0 plan

To deliver this benefit amount, Minnesota will design a program, separate from any existing programs (*Simplifying Assumption*). PEBT 2.0 will not interact with any SNAP and MFIP programming at the Minnesota Department of Human Services (DHS), as there isn't an existing mechanism to match SNAP/MFIP participant data with PEBT 2.0 requirements, such as school enrollment. Additionally, Minnesota's school data currently available at the Department of Education (MDE) is insufficient to determine PEBT 2.0 eligibility.

Therefore, to provide an accurate PEBT 2.0 benefit, Minnesota must capture school and district level data from multiple systems. Minnesota will do so through a new data portal, developed specifically for PEBT 2.0. Schools will upload data, MDE will consolidate with other data systems and pass eligible student data to DHS who will then issue benefits. Only students who have been in schools that have either been closed for 5 consecutive days or have been operating at reduced attendance or reduced hours for 5 consecutive days will receive a benefit.

Minnesota's PEBT 2.0 Eligibility and Issuance:

1. Identify School Learning Model (MDE portal)
2. Identify NSLP student eligibility (School data upload)
3. Confirm Student enrollment in school (School data upload)
4. Eligibility Determination (MDE portal and data compilation)
5. Capture necessary issuance data (School data upload)
6. Provide Benefit based on first three criteria (DHS issuance)

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: [please use as much space as needed]

Minnesota will identify eligible students through data collection from individual schools and districts through existing data systems and a new statewide portal. Data includes school enrollment status, NSLP/directly certified eligibility, CEP status, and learning model for 2020-2021 students. Additional information will be collected; such as parent/guardian contact information, child address, homeless status, etc., necessary for benefit issuance.

In Minnesota, there are only two schools that fully participate in Provision 2. All students in both schools will qualify for P-EBT if the learning model component is met. There are many schools that partially participate in Provision 2, and only students eligible for free or reduced-price meals in those schools will qualify for P-EBT. Our simplifying assumption is that schools in the latter group collect applications for free or reduced-price meals annually, so we can easily identify eligible students in those schools.

Minnesota will follow the existing process in place for NSLP eligibility. Applications are submitted by parent/guardian to schools who determine eligibility and record data. Data from schools will include eligible NSLP/directly certified and CEP students and provided to MDE. This data will only contain 2020/2021 eligible students.

Additional outreach efforts will be made to increase 2020/2021 NSLP applications. Direct outreach efforts to schools encouraging application submission, communications with partners and participant FAQ's and information sheets will be shared broadly. Minnesota has access to 2019/2020 participants who opted into text messaging, these participants will be contacted in an outreach effort to ensure 2020/2021 NSLP applications are submitted and increase PEBT 2.0 program awareness. Upon plan approval, Minnesota will issue a press release, reiterating the need for 20/21 NSLP application submission. Subsequent social media and website encouragement will occur.

As NSLP applications are accepted year round, any student who becomes eligible throughout the year, will receive benefits, retroactive to September 30, 2020.

Roles and Responsibilities:

The Minnesota Department of Education, in collaboration with local school districts, is responsible for communicating with schools, training and collecting all data from schools and districts, confirming PEBT 2.0 eligibility and sharing eligible student data with the Department of Human Services.

The Department of Human Services will communicate with county and tribal entities, community partners, issue benefits, communicate with participants, establish claims and maintain reporting.

Joint responsibility will occur with outreach, promotions and problem solving.

Public schools and non-public school status in Minnesota:

Minnesota does not collect student level information from any non-public school. Only summary data is currently collected. The new data portal will provide an opportunity to collect student level data from nonpublic schools. In order to ensure that all eligible students and schools are aware of the PEBT 2.0 benefits, MDE will increase outreach and information sharing to non-public schools.

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]

Under Minnesota's Safe Learning Plan, as outlined in Executive Order 20-82, school districts and charter schools must report to the Minnesota Department of Education (MDE) which learning model(s) they are implementing during the 2020-21 school year. This includes reporting the learning model(s) being implemented at the start of the school year and notifying MDE within 24 hours of any change in learning model. MDE has developed a Learning Model Portal where schools report this information.

Prior to P-EBT benefit eligibility and issuance, schools/MDE will confirm learning model through a monthly data review and upload of additional information necessary for P-EBT2.0. A student's learning model classification will confirm their access to meals at school and P-EBT benefit level.

- Currently, school districts are required to report one school learning model per grade, which is rolled up to a district level status, including a combination option where some grades may be in a split model (e.g. classroom quarantine). P-EBT 2.0 school status will be determined by merging school grade level data for each school with the corresponding learning model, either hybrid or distance (*Simplifying Assumption*). When districts report their learning model to MDE, they report by grade-level for their whole district. In most cases, all grade

levels in the district are following the same learning model. If a school within the district is utilizing a learning model that differs from the norm of the district, they must report that school separately. One example of where this might occur is for an alternative high school that has a different learning model from the traditional high schools in the district. We will account for those differences and issue benefits according to the learning model of each grade within each school.

- Status options for P-EBT 2.0 issuance includes: distance, hybrid, or in-person (*Simplifying Assumption*).
- Data collection will begin as soon as the new portal is available, estimated February 1. Schools will have until mid-month to upload data September-January 29. Subsequently, data collection will follow a monthly retroactive schedule.

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.
 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]

Minnesota does not have the capacity to collect individual level data on the number of school meals missed by students. It would not be feasible to ask schools to collect and report this information on individual students and impossible to ask them to do this retrospectively from the time period of September 2020 through December 2020 as this information has not been tracked uniformly by schools. Therefore, Minnesota is proposing to issue both a full distance learning amount and a hybrid amount based on the model each grade level used for the majority of the month (*Simplifying Assumption*). Based upon average instructional days in the 2020/2021 school year, Minnesota has calculated 19 lunches missed for a

month during a distance model. For a hybrid model we are assuming 11 lunches missed for benefits issued September-March. To verify the appropriateness of this hybrid estimate, we will gather a list of all public school districts operating in hybrid model on February 1, April 1, and June 1. From that list, we will select a random group of 10-15 districts to provide their current hybrid definition. (We will ensure the sample is representative of districts with a range of sizes and locations.) Data will be gathered in a spreadsheet that tracks the number of distance and in-person learning days in their current hybrid approach. The most common number of distance learning days per week will be calculated and used to justify or modify the number of hybrid days in our monthly calculation. For February, 10 of the 15 schools have a hybrid model of 3 days distance and 2 days in-person.

Full Distance = 19 lunches missed per month * \$6.82 = \$130.00 per month

Hybrid = 11 lunches missed per month * \$6.82 = \$75.00 per month

In addition to feasibility considerations, we believe having standardized amounts will help the state communicate with households about how much of the benefit they are receiving and has the potential to reduce households appealing the decision of the benefit amount. This could reduce the administrative costs of the program.

In addition, schools will provide monthly data to MDE on students who elected full-time distance learning regardless of the school's learning model. Benefits will be issued in the following manner:

- When students elected distance learning for 19 or more days in a month, they would receive the full distance benefit.
- When students elected distance learning for 11-18 days in a month, they would receive the hybrid benefit.
- When students elected distance learning for less than 10 or fewer days in a month, they would receive the benefit amount consistent with the school's learning model.

Student-elected distance learning periods are calculated based on a date range provided by the school. Since we do not know planning days or other days off in a school's schedule, they will not be accounted for in our calculation.

- Schools confirm enrollment monthly, which is a proxy for attendance as this data is not readily available. School tracking of attendance varies greatly and cannot be simplified for the purpose of this program (*Simplifying Assumption*).

To account for the fluid nature of the pandemic and that a student's status may change at any time, the state will be issuing benefits retroactively.

5. 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.

Minnesota’s timeline has been developed in partnership with the Department of Education and Human Services. FIS, Minnesota’s EBT vendor has reviewed and been consulted with on the timeline and the plan.

January:

- USDA approval
- Data Collection process for school districts finalized
- Communications plans finalized
- Data systems for schools built
- Training occurs with schools
- School communication roll out
-

February:

- Ongoing training with schools
- Public Communication roll out
- Participant communication process finalized
- FIS procedures and process finalized
- FIS cards ordered
- Data collection from schools begins
- Participant communication roll out

March:

- Data matching and eligibility occurs at state level
- Participant communication roll out
- PEBT 2.0 Issuance begins

Minnesota will split and stagger benefits for P-EBT in the following manner:

Splitting benefits by months of eligibility and issuance

Eligibility	Issuance
September 2020	March 2021
October 2020	March 2021

November 2020	April 2021
December 2020	April 2021
January 2021	May 2021
February 2021	May 2021
March 2021	June 2021
April 2021	June 2021
May 2021	July 2021
June 2021	July 2021

Staggering of issuances

DHS will issue P-EBT benefits after regular SNAP issuances have occurred for the month through the 15th. Under our current plan, DHS will send the file to EBT processor Thursday night after regular batch processes have run on the week of DHS receipt of the file from MDE. Benefits will be available on cards the following week from Monday through Wednesday staggered by the last digit of the P-EBT case number.

Last digit	Available
0,1,2	Monday
3,4,5	Tuesday
6,7,8,9	Wednesday

- *Eligibility timeframe is the range for when data are provided. Schools will only provide data for students who were enrolled through that particular timeframe.
- **Prospective issuance will be calculated for the month of September and only if necessary, based on public health emergency. Minnesota will amend the plan to address this month.

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]

Minnesota will issue PEBT 2.0 on a white card, to each individual, eligible child. **Child name and case number will be printed on the card.** Families who have multiple children will receive multiple cards. A parent/guardian name will be associated with each student in the data, which will be available read-only by helpline staff and will help with identification if issues arise. P-EBT 2.0 is a separate program with separate sub codes and will not intermix with D-SNAP or SNAP.

Benefit issuance will be scheduled for the last week of every month, outside of the SNAP issuance schedule, which ends on the 15th of every month.

P-EBT 2.0 is a standalone program with only one benefit available on the card. Expungement will follow standard SNAP practices, available for redemption for 12 months. Returned cards will follow the process developed with PEBT 1.0. The Department of Human Services receives the card, documents card information, and updates card status in EBT Edge, then properly destroys the card and contacts the client when needed.

6. 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]

Minnesota will provide customer support through a P-EBT 2.0 hotline, website, and web form to support schools and participants. This model will follow Minnesota's P-EBT 1.0 process with improvements made to call center functionality and improved electronic web forms. Minnesota's hotline number is not yet available, once ready it will be shared with USDA.

Based on our experience with PEBT 1.0, we expect the majority of questions to the call center to be around general information about the program, eligibility, benefit issuance timelines and PEBT cards questions. PEBT 2.0 call center staff will have access to MDE eligibility data to help inform conversations with clients. Additional access to update addresses to ensure proper card delivery and to update contact information for ongoing PEBT program updates will also occur.

When concerns are brought to the hotline regarding a data dispute, the following options will be deployed: After review of eligibility data and reports through the MDE portal,

A) a connection to specialized MDE P-EBT data specialists will occur to notify and address data discrepancy patterns in the data collected from schools and/or

B) a connection will be made to the appropriate school P-EBT parent liaison to resolve data discrepancies if the issue is due to a collection of data at the school level and/or

C) in some cases a benefit adjustment will be made or a determination to maintain the original benefit issuance will occur. These cases will follow an escalation process within the call center and will be case noted. DHS call center staff have access to a customer relations management software that helps identify trends, decisions, and repeat callers to ensure excellent customer service and appropriate tracking of cases.

Minnesota will serve disadvantaged groups through specific targeted efforts. Homeless individuals will receive additional information and support through school district Homeless Liaisons or assigned staff. Communications and information on P-EBT 2.0 will be provided in the top five languages identified by the Department of Education, and language support will be available to customers. Literacy is addressed through striving for a 7th grade reading level in communications, and all website information are accessible. Minnesota does not require social security numbers for any of the data collection for P-EBT 2.0.

Schools will be offered the option to receive cards for students and choose to serve as the mailing address for those that need it. Should schools elect this option, a training protocol and 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 DHS the signatures and any cards that were not picked up.

Minnesota's public information campaign will include a variety of mechanism's to share information, including social media, multiple websites, press release and partnering with affiliated community partners, school associations and other interested groups.

Minnesota's direct P-EBT 2.0 participant communication will include a variety of mechanisms:

Depending upon school capability and technology, robo-calls, email, text and letters will be utilized to share information about the process. Frequently Asked Questions will be developed to provide information, and address specific benefit details. Embedded into Minnesota's PEBT card benefit issuance is a standard flyer with each card. Details include: a brief description of PEBT (.. "for children that receive FRL.."), can only be used at SNAP authorized retailers, violation description, benefits are not transferable, and to destroy card if the participant doesn't want benefits or received by mistake. The rest of the flyer explains how to set PIN and check balance on account. Additional direct communication to

participants will include text or email to provide benefit issuance information, hotline and help information, PIN set up and card procedures.

7. 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]

Minnesota will not implement a claim process that reduces SNAP benefits. In consideration of the fact that households will receive benefits without application through an automated process, Minnesota will strive to ensure that the most current and accurate information is the basis for eligibility. Minnesota will embed mechanisms to ensure duplicate issuance does not occur through the use of student, parent/guardian and school coding during the eligibility determination process.

8. 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.

9. 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.

10. 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.”

11. 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.

12. 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
Tikki Brown,
Director, Economic Opportunity and Nutrition Assistance
Minnesota Department of Human Services



Signature
Monica L. Herrera, Director
Nutrition, Health and Youth Development
Minnesota Department of Education

Date of Request: 02/05/2021