

**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: MICHIGAN

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).

- **The *date range* covered by this State plan or amendment.**
 - October 1, 2020- September 30, 2021 (*allowing for payment back to the 9/9/20 school start date, for those schools that were closed at the beginning of the school year*).
- **Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.**
 - Assuming a total population of 900,000 students where
 - 10% are all in person
 - 60% of students are hybrid and will receive a reduced benefit
 - 30% of students are fully virtual
 - Average monthly reduced payment is \$77.06 and full payment is \$127.53.
 - See chart on page 9 of this plan.
 - Formula 60% monthly reduced amount = x 9 months
 - Formula 30% monthly full amount = x 9 months
 - Total monthly anticipated issuance total 9 months anticipated issuance
- **Estimated amount issued to school children in SNAP households.**
 - Estimated monthly amount to SNAP students: \$33,396,000.
 - Estimated amount to be issued 9/20-6/21: \$365,904,000.
- **Estimated amount issued to school children in non-SNAP households**
 - Estimated monthly amount to non-SNAP students: \$41,745,000.
 - Estimated amount to be issued 9/20-6/21: \$375,705,000.
- **Estimated total *number* of children to which the State will issue P-EBT benefits.**
 - Estimated number of school children in SNAP households
 - 400,000 potentially eligible students – assumption that the state will issue to 360,000.
 - Estimated number of school children in non-SNAP households
 - 500,000 children potentially eligible students – assumption that the state

will issue to 450,000.

- **Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.**

Activity	Estimated Costs
Quarterly FRL Household Mailings	\$8,000,000-\$10,000,000
Technology Improvements	\$2,000,000
PEBT Cardstock	\$2,000,000
Additional EBT Vendor Costs	\$500,000 Additional Conduent Costs
Administrative staff costs	\$6,800,000 (\$2.3m is new)
Total Estimated Admin Costs*	\$19,300,000 – 21,300,000

- Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - First payment 3/2021 intended to cover September 2020- January 2021
 - Issued mid-month with a staggered payment schedule
 - All payments will be issued by end of month
 - Quarterly payments will be issued retrospectively on the following cadence:
 - Feb-March will be issued in May
 - April – June will be issued in July
 - School children in non-SNAP households
 - First payment 3/2021 intended to cover September 2020-January 2021
 - Issued mid-month with a staggered payment schedule
 - All payments will be issued by end of month
 - Quarterly payments will be issued retrospectively on the following cadence:
 - Feb-March will be issued in May
 - April – June will be issued in July

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.**
 - MDE will provide a comprehensive list of all FRL eligible students in both public and non-public schools for SY20 -SY21.
 - o The previous school year data will not be utilized for benefit eligibility/issuance.
 - School districts will provide retroactive student level modality to MDHHS based on primary modality: in-person, virtual, and hybrid.
 - o Student level modality data will be collected quarterly, retroactively:

DATA MONTHS	COLLECTION MONTH	ISSUANCE MONTH
Sept 2020- Jan 2021	February	March
Feb- March 2021	April	May
April-June 2021	June	July

Parents/guardians will be provided with an opportunity to request a reconsideration of the student’s modality. This process will be a manual process. A reconsideration document will be publicly posted. A parent/guardian must complete the reconsideration request, submit it along with verification to the department. MDHHS staff will review individual circumstances and, as necessary, provide PEBT benefits to align with correct

modality.

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.

- See above information regarding FRL list. The collection of data is SNAP/non-SNAP agnostic. MDHHS will determine which students are in an existing SNAP case versus those who are not.
- MDE to provide MDHHS the following records, describing the following information:
 - o New student data
 - o New address information and new district information
 - o Newly FRL eligible students
- **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.**
 - SNAP and Non- SNAP students will be verified the same way.
 - The department will be collecting retroactive student level modality for each benefit month.
 - Student level modality is limited to 3 classifications:
 1. in person
 2. virtual
 3. Hybrid
- Districts will provide school modality information to MDHHS.
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- **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.).**
 - MDHHS will issue based on a retroactive process that verifies past student modality to determine eligibility.

DATA MONTHS	COLLECTION MONTH	ISSUANCE MONTH
Sept 2020- Jan 2021	February	March
Feb- March 2021	April	May
April-June 2021	June	July

- **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).**
MDHHS:
 - Secure necessary technology for benefit issuance using the eligibility system and infrastructure with our EBT vendor.
 - Responsible receiving both the original FRL file and updates

- Responsible to create and distribute quarterly student modality survey
- Secure necessary EBT contract change orders
- Develop and issue correspondence to eligible students
- Develop and execute reconsideration process
- Establish and operate a P-EBT call center
- Will collaborate with MDE and school districts to gather quarterly modality data.
- Collaborate with MDE on process and communications
- Collaborate with MDE to review card error and make the necessary corrections

MDE

- Maintain student eligibility for SY 20-SY 21 FRL program through the Michigan Student Data System (MSDS).
- Responsible for providing MDHHS with a list of all eligible students
- Responsible for providing updates with new students, address and district changes, and eligibility changes provided three times a year
- Will collaborate MDHHS and school districts to gather the quarterly modality data.
- Collaborate with MDHHS on process and communications
- Collaborate with MDHHS to review card error and make the necessary corrections

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.**
 - Local school districts will complete an electronic quarterly survey indicating the school level modality for each building within their jurisdiction. Survey data will be requested on a quarterly basis to collect modality for previous months. Benefits will be issued based on those responses.

- **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?**
 - School districts will be provided with information as to how that determination should be made. School districts will be responsible to track and report when the threshold is met.
- **Describe how this information will be obtained and how often**
 - MDHHS will develop a survey that local school districts complete quarterly, covering prior specified months.
- **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.**
 - Schools will be expected to provide status retroactively. Benefits will be issued on the school modality.
- **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.**

Simplifying Assumption 1: capturing data at a building level.

Simplifying Assumption justification: This approach provides a means to issue a reasonably appropriate benefit level to the mass of students in the state given the limited data available. This brings minimal risk to overpayment while reducing administrative complexity. Further this approach provides an opportunity to accurately modify benefit amounts based on individual student schedules by providing a reconsideration path. Ultimately, this simplifying assumption reduces the administrative burden that would otherwise prevent participation in the PEBT program and allows Michigan to issue benefits expeditiously.

We do not have student level attendance data nor student level modality data. The state is not legally allowed to collect such data. Given this unfortunate reality, each district will report the most frequently occurring modality of the student population for each school building. Based on the structured decision making below, student within a building will initially be assigned the same modality with benefits being issued based on this. Individual students will have the opportunity to request a reconsideration to receive additional benefits.

Districts will report a primary modality based on the following hierarchy:

1. If 10% or more of the student population are in-person for the entire month the school will report fully ‘in-person’ and no benefits will be issued.
NOTE: In this situation, individual students who have a specific schedule other than fully in-person will have the opportunity to request a reconsideration.

2. If 90% of the student population is fully virtually for the entire month the school will report as fully virtual and benefits will be issued.
3. If neither 1 nor 2 are appropriate, schools will report hybrid if one or more of the following circumstances are met in a month and benefits will be issued.
 - a. School changes modalities in the month
 - b. School reaches the 5-day threshold in the month.
 - c. School building closes for some portion of the month due to COVID (not weather related)
 - d. More than 10% of the student population attended partially in-person and partially virtual for the entire month.

Simplifying Assumption 2:

Students eligible for the May payment based on modality will be eligible for the final days in June based on May modality.

Simplifying Assumption 2 reasoning:

Allows for completion of survey while school staff are available.

Over the course of our plan development, MDHHS met with MDE, Intermediate School District and School District representatives to fully understand the operational differences between hybrid modalities to determine an accurate benefit amount. Anecdotally, it was established that the three days of at home learning was the best estimate. Further, the Michigan Department of Education collects educational data via a monthly survey. The results of the survey are summarized and published to their public website as the Extended COVID-19 Learning Plan Dashboard. Districts that offer a hybrid modality were asked to report the minimum and maximum in person instruction days offered. MDHHS selected October and December as representative months. The data was aggregated so that the charts below are representative of all grades and school types. The modal value is a maximum and minimum of 2 days in person learning per week, which means 3 days of virtual learning per week. MDHHS will review the February and April survey data to determine if the hybrid level amounts should be modified.

October: Number of Hybrid Districts by Minimum and Maximum days of In-Person Instruction Per Week										
		Maximum Days								
Number of Days		0.5	1	1.5	2	2.5	3	3.5	4	4.5
Minimum Days	0.5	29	24	8	29	4	3	0	109	56
	1	0	31	0	85	30	36	10	187	11
	1.5	0	0	1	2	0	0	0	0	0
	2	0	0	0	1125	25	214	0	211	28
	2.5	0	0	0	0	24	0	5	7	0
	3	0	0	0	0	0	30	0	21	4
	3.5	0	0	0	0	0	0	1	1	0
	4	0	0	0	0	0	0	0	602	14
	4.5	0	0	0	0	0	0	0	0	122

Number of Hybrid Districts by Minimum and Maximum days of In-Person Instruction Per Week

		Maximum Days								
Minimum Days	Number of Days	0.5	1	1.5	2	2.5	3	3.5	4	4.5
	0.5	28	12	3	50	0	20	0	52	72
	1	0	1	0	19	0	10	10	129	10
	1.5	0	0	1	0	0	0	0	1	0
	2	0	0	0	397	1	111	0	150	35
	2.5	0	0	0	0	29	1	2	5	0
	3	0	0	0	0	0	30	0	11	4
	3.5	0	0	0	0	0	0	2	1	0
	4	0	0	0	0	0	0	0	289	28
	4.5	0	0	0	0	0	0	0	0	74

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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.**

Simplifying Assumption 1:

Any student who participates both in person and virtually in a month is considered hybrid. Any student classified as hybrid in a month, will receive a standard hybrid benefit amount for that month. Hybrid students will receive a P-EBT amount of 3 days a week for each school week.

Simplifying Assumption 1 reasoning:

We expect schools to meet the 5 day threshold at various points in the year. Calculating special benefit amounts by school will add additional complexity and work effort that would result in additional administrative burden and delay in benefit issuance.

Simplifying Assumption 2:

Students eligible for the May payment based on modality will be eligible for the final days in June based on May modality

Simplifying Assumption 2 reasoning:

Allows for completion of survey while school staff are available.

Benefit amounts

Fully Virtual

MONTH	NUMBER OF SCHOOL DAYS	BENEFIT AMOUNT
September	17	115.94
October	22	150.04
November	19	129.58
December	14	95.48
January	20	136.40
February	20	136.40
March	23	156.86
April	22	150.04
May	21	143.22
June	9	61.38

Hybrid

MONTH	NUMBER OF SCHOOL DAYS VIRTUAL	BENEFIT AMOUNT
September	10	68.20
October	13	88.66
November	12	81.84
December	9	61.38
January	12	81.84
February	12	81.84
March	14	95.48
April	13	88.66
May	12	81.84
June	6	40.92

NOTE: based on simplified assumption of hybrid participation in school for 2 days a week.

FULLY VIRTUAL

QUARTER	NUMBER of DAYS	BENEFIT AMOUNT	COLLECTION DATE	ISSUANCE DATE
Sept-Jan	92	627.44	February	March xx
Feb-March	43	293.26	April	May xx
April-June	52	354.64	June	July XX

HYBRID

QUARTER	NUMBER of DAYS	BENEFIT AMOUNT	COLLECTION DATE	ISSUANCE DATE
Sept-Jan	56	482.72	February	March xx
Feb-March	26	184.14	April	May xx
April-June	37	252.34	June	July XX

NOTE: based on simplified assumption of hybrid participation in school for 2 days a week.

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.
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- 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.

TIMELINE

Some items in timeline are dependent on authority to use admin funds. If the plan is approved by January 2021, we expect the following to be in place.

First FRL File is expected 1/25

Technical work is expected to be completed 2/1

- Inform schools and submission instructions – 1/10
 - Ongoing discussions occurring
- EBT vendor change order – 1/15
- Public communication – 1/15
- Call center go live – 1/15
- FRL file from MDE - 1/25
- School surveys go live – 2/1
- School survey returned – 2/21
- Process benefits to EBT vendor – 3/1
 - Clients benefits available – staggered over 10 days
- Benefit notices issued 3/5
- Reconsideration process begins 3/5

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?

- The state will issue a PEBT card, see attached example. These cards will be issued to non-SNAP households. SNAP households receiving this benefit will have it issued to their current SNAP account and use their current Bridge card.
- **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.**
 - Michigan is not currently issuing DSNAP benefits; therefore, we will be using DSNAP coding to issue PEBT. Using the DSNAP coding will allow for separate accountability from regular SNAP benefit.
- **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.**
 - We draw funds based on expenditures entered into the MD1 daily wire to Conduent. All are entered the same day and we draw one total from ASAP daily.
- **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.**
 - The State will follow our current policy for SNAP benefits, for P-EBT benefits.
- **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?**
 - Returned P-EBT cards will be indexed into a report by the EBT vendor and the report will be provided to the department. Returned mail issues will be reviewed and these issuances will be corrected to reissue the P-EBT card to the correct address.
- **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?**
 - P-EBT cards will be issued to Non-SNAP households only. SNAP households will have the benefits issued to their current account. P-EBT issuance cases for FY 20 which have remaining benefits will not be impacted by the FY 21 issuance
 - **If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?**
 - NA

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.**
 - MDHHS will allow for a reconsideration process.
 - MDHHS will operate a P-EBT call center.

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.

There are many unique challenges for some populations eligible for P-EBT.

- Homeless children –MDE will provide the school address as the child address. The card will go to the school who will ensure delivery.
 - Social security card – This is not an issue as this information is not required for the FRL application.
 - Limited English Proficiency (LEP) – MDHHS has a PEBT call center which makes use of the department’s translator contract for translation.
 - Foster Children- MDHHS will compare the FRL list against our eligibility system to determine a foster child’s current address.
 - Lack of internet - This is not a barrier, as we can communicate via phone and paper applications can be completed for FRL.
 - Disabled populations – MDHHS and MDE adhere to all ADA requirements when assisting clients.
- **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).**
 - Public information campaign will include:
 - Press release
 - information posted on MI Bridges (public assistance portal)

- Information posted on the MDHHS website
 - information shared with our SNAP Outreach partners
 - information shared with Community Action agencies
 - information shared with MI Bridges navigators
 - information shared Intermediate school districts, school districts and individual school buildings for distribution to school employees and parents/guardians
- **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)

The notice will include an explanation of P-EBT generally, eligibility for the program, benefit amounts by month, issuance cycles, how to check balances, how to request a replacement card, where P-EBT can be used, who to contact for questions, a way to apply for missing payments and how to opt out.
 - **How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?**

Client letters and communications via the MDHHS and MDE websites and SNAP Outreach partners.

- **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.**

MDHHS will send letter/mailler out.

- **Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?**
 - At a minimum, additional information will be posted on the MDHHS website and social media.

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:

As we are using a historical review of all students, we will determine eligibility based on real time data. If a case is found to have received benefits in error MDHHS will initiate removal of that amount from the next benefit or issuance a stop payment and inform the client.

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
Print Name and Title

Signature
Print Name and Title

Date of Request: _____