

**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:** New Mexico

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).

Response:

- a. The date range covered by this P-EBT plan is **October 1, 2020** through **June 30, 2021**.
New Mexico Human Services Department (NMHSD) in collaboration with the Public Education Department (PED) commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this plan.
- b. The estimated total amount of P-EBT benefits NM will issue is **\$55,642,652**.
 - a. Estimated amount issued to school children in SNAP Households is **\$29,253,805**.
 - b. Estimated amount issued to school children in non-SNAP households is **\$26,388,847**.
- c. The estimated total number of children to which New Mexico will issue P-EBT benefits is **246,547**.
 - a. Estimated number of school children in SNAP households is **128,003**.
 - b. Estimated number of school children in non-SNAP households is **118,544**.
- d. The estimated total amount of administrative funds New Mexico needs to complete the work described in this P-EBT plan is **\$6,641,424.16**.
 - **FIS Support Services** - are approximately **\$350,000** per month for a total of **\$3,150,000** for the period of this plan. HSD is using an average of costs from the months of June, July and September as the best available to anticipate FIS ongoing expenses for each month. The average for the three (3) months is \$383,990.62 for a total of \$767,981.25. FIS monthly average cost without the administration of P-EBT is \$113,520 as reflected in August. HSD recognizes that there will be fewer new cases set up and fewer initial P-EBT cards issued, but there will be some occurring. This cost includes:
 - Storage fee for cards over 10,000 which is \$1,500 per month per every 10,000 P-EBT cards;
 - New case set up fees;
 - Replacement card fees;
 - Various support fees.

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.

Month	Invoice#	Billed Amount	Additional Costs
Jun-20		\$ 553,735.48	\$440,215.48
Jul-20		\$ 392,526.01	\$279,006.01
Aug-20		\$ 129,658.50	
Sep-20		\$ 546,270.38	\$432,750.38

- **Benefit issuance activities** - are approximately **\$175,000 for each issuance**. New Mexico anticipates that there will be a total of five (5) separate issuance for a total of **\$875,000**.

Summary of Changes P-EBT Issuance for October and November 2020
PED School File Analysis
Development (Code changes and Reference table changes) and Testing to Issue benefits
Dry run in Patch Environment (Monitoring and Validations)
Generating reports for Dry run
Production run (Monitoring and Validations)
Generating Production Reports

- **ASPEN, eligibility system, modifications** – are approximately **\$1,981,954.88** (**\$1,925,000 -system- plus \$56,954.88 -staff-**). This amount includes the estimated costs for the ASPEN modifications as well as two staff members salaries for 16 weeks specific to the work on this activity. These modifications allow HSD and PED to effectively manage the administration of the P-EBT benefits. These changes will be permanent modifications and will allow the state to utilize the functionality if ever needed in the future, where the state must issue P-EBT benefits.
- **Notice with each P-EBT Issuance - Postage and printing costs are approximately \$634,469.28**. As of the latest P-EBT issuance, NMHSD issued benefits to approximately 190,600 distinct households. The anticipated costs are outlined below per issuance. NMHSD anticipates four issuance runs:
 - .412 per items for postage = \$78,527.20 per run, total = \$314,108.80
 - .3192 per item to be printed = \$60,839.52 per run, total = \$243,358.08
 - .1010 per item for envelopes = 19,250.60 per run, total = \$77,002.40
- e. P-EBT issuance schedule applies to all eligible students regardless of SNAP eligibility. The tentative issuance schedule is as follows:
 - **October and November** – Issuance February 2021
 - **December and January** – Issuance date TBD
 - **February and March** – Issuance date TBD
 - **April and May** – Issuance date TBD
 - **June** – Issuance date TBD

Each issuance will include two (2) months of P-EBT benefits and the issuance will be staggered to avoid overwhelming grocers and to be able to adhere to social distancing.

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.

Response:

- *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.*

The PED identifies eligible students and confirms their P-EBT eligibility by receiving the new free and reduced data for SY 2020-2021 for each month that P-EBT benefits will be issued. The School Food Authority (SFA) verifies and certifies students free and reduced lunch by utilizing household applications and the USDA income eligibility thresholds set for this school year. The SFA’s also utilize the NM direct certification system to identify the students that are certified for free meals. The SFA’s will submit their free and reduced-priced meals eligible students during official reporting periods to the PED. Once the data is received, PED staff will verify and validate the students are coded correctly. Once validated, the data will be sent to HSD to issue the P-EBT benefits to all students that were identified as eligible for P-EBT. The PED certifies that the children sent to HSD are current and eligible for the P-EBT benefit ensuring that HSD will only issue P-EBT to students that are certified for free and reduced meals for the current SY 2020-2021 and not issue benefits to school year 2019-2020 graduates and other non-students.

Through the validation and certification process of student eligibility data, New Mexico PED ensures that any child that is no longer eligible for P-EBT will not be issued the P-

EBT benefit. SFA's submit data that is current and only includes those students who are eligible for free or reduced-price meals for SY 2020-2021 reporting period and does not include any child who has graduated, is no longer a student or who may no longer qualify for free or reduced priced meals.

- *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.*

The PED determines and/or confirms each child's eligibility for free or reduced-price meals by utilizing household applications and the USDA income eligibility thresholds set for the school year; this process is used for all children in public and non-public schools, new students and children who become newly eligible during the school year. The SFA's utilize the NM direct certification (DC) system to identify students that are certified by the SFA for free meals. The SFA and state agency utilize the USDA Income Eligibility manual in the certification of free and reduced-price meals for the National School Lunch Program (NSLP). All SFA's, Public, Charter, BIE, and Private schools that participate in the NSLP utilize this process. The DC system identifies students that are on SNAP and TANF along with other identified students' categories, so that SFA's can certify students for free meals utilizing this information. The DC system separates and can distinguish SNAP and SNAP only qualified students. How the student qualified for free and reduced-price meals is identified in the PED student reporting system, STARS. STARS has reporting fields that are separated by SNAP, DC, free and reduced categories to identify specifically how each student qualified and was certified for free or reduced-price meals.

- *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.*

The PED requires that every school and district, whether they are a Public or Private school, to develop and submit a comprehensive plan on how they are operating the schools within the district (remote, face-to-face, hybrid) during the Covid-19 State of Public Health Emergency. All changes in the school operation from the original plan, are required to be reported to the PED on a bi-weekly basis.

The PED has tracked the operation of all schools since the beginning of SY 2020-2021. About 90 percent of SFA's in NM that participate in NSLP have been operating remote, hybrid or reduced school hours since October 2020. All remote students are eligible for the P-EBT benefit for the days they conduct remote learning instruction. The public schools and districts Superintendent/Director or designated staff report the model being conducted, bi-weekly to the PED designated staff. When this information is reported to the PED, if they are operating a hybrid model, the staff are required to notify the PED the days they operated face-to-to face instruction and remote learning for the previous 2 weeks.

The days that the students are face-to-face learning, they have access to breakfast and lunches through the NSLP and are not eligible for the P-EBT benefit for those days. The

hybrid students are eligible for the P-EBT benefit for the days that they are remote learning. The Private and BIE schools are required to notify the PED of their learning model when they report the data to the PED for each P-EBT issuance. The information will include the days that the students were remote learning with no access to breakfast and lunches through the NSLP; these days the students will qualify for P-EBT benefit. Therefore, the PED will only issue the P-benefit for the remoted learning instruction days that are qualified during each phase of P-EBT issuance.

The PED tracks the students by all identified categories inclusive of SNAP or Non-SNAP students in their data reporting system.

- *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.).*

The PED has implanted a process for public schools and districts to report their learning models for each student (remote, face-to-face, hybrid) learning model on a bi-weekly basis. If changes in the learning model occur more frequently than bi-weekly, the schools or districts are required to report the change to PED immediately. The Private and BIE schools will let the PED every other month the learning model when they report the P-EBT required student data to the PED for each P-EBT issuance. The information that they will report will include the days that they were remote learning and face-to-face learning model. Only the remote learning days will qualify for P-EBT as the students do not have access to breakfast and lunches at school for the NSLP.

- *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).*

The PED is responsible for validating confirming the student's free and reduced eligibility and qualified days for P-EBT benefits (remote learning) for the phases of issuing the P-EBT benefits. The NM HSD receives the eligibility data from The NM PED and issues the benefits via the P-EBT card based on the data provided by The NM PED. The HSD maintains the P-EBT online portal that was developed through HSD's online application. This online portal is used by customers to update addresses and check individual eligibility. This helps alleviate some of the calls that staff must answer daily.

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.

Response:

- *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.*

The PED tracks the learning models of operation within each district and school on a bi-weekly basis. The public schools' districts and schools are required to notify the PED their schedules, operations, and learning models, and report immediately if changes occur. The PED requires every school and district, whether they are a Public or Private school, to develop and submit a comprehensive plan on how they are operating the schools within the district (remote, face-to-face, hybrid) during the Covid-19 State of Public Health Emergency. All changes in the school operation from the original plan, are required to be reported to the PED by the designated school or district staff.

The PED has tracked the operation of all schools since the beginning of SY 2020-2021. The majority of SFA's that are participate in NSLP have been operating the remote learning model and a small population of districts and school have been operating the hybrid learning model. The PED tracks the students by all identified categories inclusive of SNAP or Non-SNAP students in their data system.

- *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?*

The PED tracks the learning models of operation within each district and school. The public districts and schools are required to notify the PED their schedules, operations, and learning models, and report immediately if changes occur. The BIE and Private schools will report the learning models every other month when they submit their student data for each phase of P-EBT issuance. They will report the days they are remote and face-to-face to allow the PED to determine the days the schools' students qualify for P-EBT for that timeframe. The PED maintains an internal document that captures all the districts and schools learning models. This document is updated as changes are reported by any school or district.

The PED requires that any school with a reported positive COVID-19 case call the PED hotline to report it. After four reported cases, a school is required to close for 14 days; this information is tracked internally by the PED.

- *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.).*

This information is obtained by the PED on a bi-weekly basis for public schools and districts. The BIE and Private schools report the learning models every other month when they submit their student data for each phase of P-EBT issuance. They report the days they are remote and face-to-face to allow the PED to determine the days the schools qualify for P-EBT for that timeframe.

- *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.*

The PED has state data reporting periods every 40 days during the school year for public schools. This reporting period occurs more frequently than the guidance given by USDA, which is every 2 months. During the 40 days of reporting, the PED continues to have public schools or districts report when school operations and learning models change, at a minimum biweekly. The BIE and Private schools will report the learning models every other month when they submit their student data for each phase of P-EBT issuance. They will report the days they are remote and face-to-face to allow the PED to determine the days the schools qualify for P-EBT for that timeframe

The PED maintains records of all schools that report positive COVID-19 cases and when the 14-day mandatory school closures occur. The PED complies with the Governors orders as well to determine the learning models for each school district.

The PED utilizes the collected and updated information received by the schools, districts and the Governor, to ensure the accuracy and integrity of the P-EBT benefits.

- *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.*

NM is utilizing a simplified assumption in terms of total operating school days. This will be applied for all schools and districts for the months of October and November. In calculating operating school days, Veterans Day, Columbus Day and two (2) days for the Thanksgiving Holiday will be deducted when calculating the amount of total qualifying school days for the P-EBT benefit amount. Most schools typically give the students one day off for Veterans Day, Columbus Day and the Thursday and Friday off for the Thanksgiving Holiday. The PED and HSD removed these days to ensure that the total days used to calculate the P-EBT benefit is accurate and we only issue benefits for the days that qualify under USDA guidance.

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>

Response:

- *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.*

The HSD and PED issues benefits to students that are certified for free and reduced priced meals for the days the students are in the remote learning model and do not have access to lunch and breakfast in the National School Lunch Program (NSLP). The PED sends student data along with the amount that each student is eligible for based on the school learning model and qualifying P-EBT days for that timeframe.

NM is utilizing a simplified assumption in terms Holiday school day in which the children are not eligible for the P-EBT benefit. This will be applied for all schools and districts for the months in calculating qualifying P-EBT operating school days. This will apply to universal Holidays school and students are typically off.

The state is utilizing this simplified assumption as most schools typically give the students one day off for Veterans Day, Columbus Day, and the Thursday and Friday off for the Thanksgiving. The PED and HSD removed these days to ensure that the total days used to calculate the P-EBT benefit is accurate

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.*

Response:

- NM anticipates the first issuance to occur in February 2021 and then issuing every two months with a staggered issuance of benefits.
- NM milestones include, but are not limited to:

Ongoing Efforts-NM has implemented many efforts to address lessons learned and to continue collaboration between HSD and PED.

- **Team Meetings** – HSD, in collaboration with PED have reoccurring scheduled meetings twice per week to document and ensure that all milestones are met. These meetings are to:
 - Discuss upcoming activities and set specific dates as well as owners of all action items.
 - Discuss and address all concerns.
 - Review and document progress.
- **P-EBT hotline-**
 - This hotline accepts incoming calls and has a voicemail.
- **Public Notice Campaign-**
 - Press releases have been issued for past P-EBT benefit issuances and will continue to be issued for any future issuances.
 - Social Media platforms are kept updated.
 - YesNM Banner update- provides useful information to constituents when they log into their account through YesNM
 - HSD and PED websites are kept updated.

Implementation Timeline –**Day #0-**

- HSD in collaboration with PED submit the P-EBT amendment to FNS for review and approval.

Day #1-

- USDA approves P-EBT plan for the specified timeframe of SY 2020-2021.
- HSD and PED distribute FNS approval to all necessary bureaus and individuals for development of agreed upon issuance timeframe.
- Notify EBT to ensure that there are enough P-EBT cards in stock for the specific issuance; if determined that additional cards are needed, begin request. State will then submit P-EBT Implementation Approval Form requesting additional card stock to P-EBT card vendor to secure adequate P-EBT card stock inventory.

Two weeks prior to issuance-

- PED to provide student data to Deloitte for development and testing.
- HSD to lead the communications-
 - Develop the Press Release to be issued before 1st issuance.
 - Work in collaboration with the department's Communications Director and staff to ensure all social media platforms are updated before 1st issuance.
 - Announcement to ISD Field Staff through QuiKGuide for HSD staff and email notifications for PED staff.

- *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?*

Every household/child that is eligible for the P-EBT benefit will receive a unique P-EBT card, regardless of the receipt or non-receipt of SNAP. If the household/child previously received a P-EBT card the benefits will be deposited onto that specific card. There are checks and balances to ensure that if a guardian or address has changed, that the P-EBT benefits get issued correctly to that child even if it means that a new P-EBT card is requested and issued.

- *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.*

HSD issues P-EBT benefits as a sub-benefit type, to distinguish between SNAP and D-SNAP cases. The P-EBT benefit is identified with a unique program code (FSEH5) to distinguish the P-EBT program category from all other assistance categories.

- *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.*

HSD issues all P-EBT benefits on a unique P-EBT card so there is no need to prioritize the draw/spend among other benefits. P-EBT follows spend priority 1 process, first in first out within a month; this will be the priority if ever issued to an existing SNAP EBT card.

- *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.*

NM applies the same expungement rules that applies to SNAP cases to the P-EBT benefits. This is being built into ASPEN with the system modifications.

- *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?*

FIS (states' EBT Processor) will receive the P-EBT returned cards, code the cards as undeliverable and destroy them. Customers can request an address update and a new P-EBT card by logging into the P-EBT portal through YesNM. They can also update their address and request a new card by calling the P-EBT hotline.

- *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?*

HSD will not issue new P-EBT cards to existing P-EBT households. If the household no longer has their P-EBT card, they can request a new card by logging onto the P-EBT portal through YesNM, if they need to update their address, call FIS (P-EBT card vendor) directly to request a replacement card, or contact the P-EBT hotline to request a replacement card.

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.

Response:

- *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.*

NM PED and HSD have a dedicated hotline to handle P-EBT calls; this has been utilized since the Spring P-EBT issuance. This hotline accepts voicemails and is handled by a dedicated manager and staff. These staff are empowered to research and address such cases. An online P-EBT portal was developed through the HSD's YesNM online application for customers to update addresses and check eligibility. All address updates that are completed through the online Portal are sent to dedicated staff that evaluates the address change to make any necessary changes and order new P-EBT cards as necessary. Address updates are sent frequently to ensure that staff can perform updates and request card replacements timely. The P-EBT manager along with managers from the Policy and Program Development Bureau work in collaboration to resolve disputes and/ or issuance errors. When necessary the HSD works with appropriate school food director to validate information that is disputed by the client. Once validated, HSD works the contractor, Deloitte, to correct and or issue corrected benefits; this is on a case by case basis.

- *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.*

The PED and HSD work in collaboration to identify all eligible children. Once identified by PED as eligible, the children are not required to complete any type of application and are not required to do anything further to receive the P-EBT benefit. If identified by PED as receiving and or eligible for free or reduced-price meals, the child will receive the P-EBT benefit. The data utilized for each issuance is the most current data to ensure that the P-EBT cards and benefits are issued to the correct addresses and all eligible children receive the benefit. NM offers a P-EBT hotline, an online P-EBT Portal, access to a point of contact with the School Districts and works closely with different advocates to address all the stated barriers.

- *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).*

The PED in collaboration with the HSD are diligent in getting information to the public regarding the P-EBT benefits and the eligibility. Both Departments post information on the Departments websites and different social media platforms, such as Facebook and Twitter. Both Departments post and issue Press Releases to issue current and updated information regarding the P-EBT benefits. On different occasions, different advocacy groups have requested information to be able to provide mailers and complete various media campaigns of their own.

- *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.*

The PED and HSD recognize the importance of providing clear and concise information to the P-EBT participants. Currently, the recipients receive a flyer with the P-EBT card. It explains the purpose of the P-EBT benefits, how and where the P-EBT card can be used, what to do if they do not wish to accept the P-EBT benefits, how to activate the card, that a PIN must be selected, and what to do if the card that is received is a replacement card. It also provides information on how to check the balance and to obtain other account information. The flyer provides a QR code that can be scanned to utilize the mobile App. The same information is distributed to SNAP and non-SNAP households as all receive a P-EBT card. The PED also utilizes available notification technology to notify the students and families such as emails, text messages, and robo-calls.

The HSD keeps the banner on YesNM updated for constituents to receive updated information when they log onto their account through YesNM. NM HSD and PED websites have dedicated areas for P-EBT information that is kept current.

With the ASPEN modifications, the P-EBT recipients will receive a notice each time there is an issuance of P-EBT benefits. This notice will include all language suggested by USDA.

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:

The PED validates all data and provides only students that are qualified for P-EBT based on household application for free or reduced-price meals and identified student categories per USDA guidance and regulation. The data provided to HSD will be unduplicated students that have been determined eligible for the P-EBT benefit. The PED ensures that only one qualifying category will be utilized for certifying students for free and reduced students (example: SNAP trumps other categories). In determining the benefit amount for each child, the PED and HSD use only qualified school days and the daily rate amount based on USDA latest guidance. The HSD contractor, Deloitte, runs the PED data file before issuance to remove any duplicates; this is accomplished by utilizing the students ID number, and first and last name.

If the benefits are disputed for any reason, the P-EBT dedicated staff will research the concerns. Each case/concern will be handled individually. If determined that the original P-EBT benefits were issued incorrectly, NMHSD will work with the contractor to ensure that the child receives the correct amount of entitled P-EBT benefits; claims will not be established.

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
Karmela Martinez, ISD Director

DocuSigned by:



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Signature
Michael Chavez, Director, Student Success and Wellness Bureau

Date of Request: December 1, 2020