

**State Plan for Pandemic EBT
Children in School and Child Care, 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 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
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>

The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

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

1. **State:** Nebraska

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

3. **Executive Summary:**

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

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

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

Response:

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.

Nebraska proposes this 2020-2021 plan for a continuation of August/September P-EBT benefits and for additional benefits from October 1, 2020 through September 30, 2021. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this plan.

August/September benefits: Nebraska has 39,016 students that did not receive benefits in August/September when they should have. School districts were unable to provide necessary data timely so many children that were eligible based off the SY2019-2020 amended plan were missed. The information for these students has already been gathered and benefits will be issued totaling \$4,504,148. Omaha Public Schools, which was 100% remote during August and September, did not receive benefits. Students from Omaha Public Schools will receive the 100% remote payment of \$116 and all other students will receive the hybrid/split payment of \$62 for this time. These amounts include the increased benefit amounts reflective of \$6.82 per day in benefit. Nebraska does not have the ability at this time to issue an adjustment to those students that previously received benefits for August/September. If a solution is identified, Nebraska will work with FNS to issue the additional benefits.

October 2020 through September 2021 benefits: Based off Nebraska Department of Education (NDE) data as of January 11, 2021 there were 68,780 students participating in 100% remote learning or a hybrid-learning environment. At this point, it is unknown how many students participating in remote learning are eligible for free and reduced-price meals. Due to this unknown, estimates were completed using the total number of remote learning students, assuming these amounts will fluctuate throughout the year depending on the pandemic. The majority of students in Nebraska are participating in an in-school learning environment. Due to this, the hybrid benefit amount was used to determine estimated P-EBT benefit amounts. This amount is \$62 per month and is based on average school days per month (See 4. Benefit Levels).

If all students receive the hybrid amount, monthly benefit would be \$4,264,360 (68,780 students X \$62). The total amount of benefits for the eight months would be \$34,114,880.² Based off past P-EBT issuances, benefits were split about 50% between SNAP and nonSNAP children. Estimated monthly benefits to SNAP and non-SNAP children is \$2,132,180 and the total estimated benefit to SNAP and non-SNAP children is \$17,057,440.

The estimated total number of children in Nebraska eligible for free and reduced-price meals is 148,245. Of that number, 74,589 are SNAP children and 73,656³ are non-SNAP. See sections 5 and 9 for additional information related to administrative costs and issuance schedule.

The estimated total amount of administrative funds the State needs to complete the work described in this plan is \$463,573.⁴

² These estimates are expected to change as the number of students participating in remote learning changes frequently.

³ The most current Direct Certification data available was used to determine these estimates.

⁴ These estimates are preliminary and this amount is anticipated to increase.

4. P-EBT for School Children A. Eligible Children

Standard for P-EBT Eligibility

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

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

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 20192020 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 inperson and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.).
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response: The responses below are in relation to benefits for October 2020 through September 2021. The August/September benefits will be issued prior to these additional benefits.

Each school district (public and non-public) will provide lists of enrolled students eligible for free and reduced-price meals by school along with each schools' learning environment. The student information will be submitted to a secure portal available through a NDE website. NDE will gather the schools' data and create two files for DHHS. One file for 100% remote students and one file for hybrid students.

Information on eligible students will be received directly from the school. Schools will be instructed to upload a list of their students determined eligible for free or reduced-price meals for school year 2020-2021. Schools will also be instructed to remove students who have graduated or moved out of district from this list and add students newly eligible by way of direct certification, other categorical eligibility sources or via the 2020-2021 National School Lunch Program (NSLP) approved household applications. Schools will be instructed to only provide data on eligible students and will not provide data on non-students or ineligible students. NDE will verify enrollment of the students by comparing the list to its Adviser student information system. Districts will submit their report monthly in order to provide the most current student data including those newly determined as eligible for meal benefits, transfers, new to the district, etc. Schools are accepting new applications from families leading to new determinations being made. For those schools operating under the SFSP program, eligibility from 2019-2020 is carried forward unless a new application and determination is made. Nebraska continues to conduct Direct Certification on a daily basis and continues to directly certify children who are newly eligible this year.

Each school district (public and non-public) will provide data to NDE through a secure upload portal, this data will include a list of students determined eligible for free and reduced-price meals. This list will be used to issue benefits and includes students' first and last names, date of birth, mailing address, gender, parent/guardian name(s), name of school, and school district. NDE will use the direct certification list to indicate which students are SNAP eligible by adding a program case number to the SNAP file. Nebraska's eligibility system will be used to pull EBT card numbers so P-EBT benefits may be issued to existing EBT cards. Non-SNAP, public, nonpublic, and new students will make up the remainder of the students. Public and non-public schools will update their eligible students monthly in order to capture those students new to the district or transferred out of the district or newly determined as eligible for free or reduced meal benefits.

There is no way to track on an individual student level who is able to access meals and who is not. Nebraska will make the simplified assumption that students that are not in school do not have meals available. Therefore, a student that is learning outside of the school building (fully remote or split schedule) will not have access to meals. Based on the best available data, a split schedule will be assumed to be a 3/2 schedule. Meaning that students in a split schedule will be in school three days one week and two days the next week. This is based on Nebraska's two largest school districts (Omaha Public Schools and Lincoln Public Schools) defining their split schedule as three days one week and two days the next. These two school districts will make up the majority of the students receiving P-EBT benefits. Therefore, students in a split schedule will receive benefits for 9 days rather than the full 17 days per month. This will apply to all categories of students including SNAP, non-SNAP, public, and non-public.

NDE will use the information reported through the Launch NE website for specific learning environments. The Nebraska Department of Education (NDE) created a reporting site within their Launch NE web page to indicate the current learning environment at Nebraska school districts. This is the best data available for determining the current learning environments in schools. Districts can report by elementary, middle, and high school buildings. Using the simplified assumption that all elementary, middle, and high school grades will operate under the same learning conditions as stated on the Launch Nebraska site, all students will receive P-EBT benefits based on the learning condition identified for their grade level, unless the district has identified a student as fully remote.

Nebraska believes issuing benefits retroactively will allow school districts to report the information for eligible students and their learning environments. School districts will also be able to report those students that may have opted out of in person learning to 100% remote learning or any other alternate learning environment. Each school district will be allowed to provide information to NDE so that the P-EBT benefits may be determined. In addition, if a family reaches out to NDE or DHHS to report potential eligibility, each situation will be addressed and eligibility will be determined. If Nebraska determines an additional learning environment and benefit level needs to be created, FNS will be consulted.

Schools will update learning environments as changes occur through the Launch NE site established by NDE. NDE will ask the district to confirm their learning environment for each month that data is submitted. NDE will work with the schools to provide information about eligibility, communication for families, and the secure upload site for student data. NDE will be responsible for preparing the files from the school and sending the files to DHHS. DHHS will work with NDE to obtain student information to issue benefits. DHHS will communicate with families and will work with the EBT card vendor to ensure benefits are issued.

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:

Schools will report their learning environments and any changes to their learning environments to the NDE's Launch NE website. Launch NE allows districts to enter dates when changes occur, and historical information is available to track these changes to determine the learning environment for the majority of the month (for 12 days/month). NDE will monitor this information and ask the districts to confirm and certify their learning environment for the month in which data is submitted to the secure portal.

Nebraska identifies the types of learning environments as: 1) in school, 2) split (hybrid), and 3) remote (100% virtual). Each district will report their learning environment for each type of school (elementary, middle, high) to the Launch NE site. Nebraska will be issuing benefits retrospectively based on the learning environment used for the majority of the previous month. Learning environments can change within each month, but the learning environment the school was in for the majority of the month will be used when benefits are to be issued. It is anticipated to be very few learning environment changes in the middle of the month but issuing retrospectively will allow changes to be made as necessary.

Each school will report the date of the change to their learning environment. The majority of schools operating a split schedule have been doing so since August so they met the five consecutive days rule. This will be verified by NDE and for any new status update. School districts will be asked to verify their learning environment at the time student data is submitted. This data will include the dates learning environments start and end. For example, after a district submits their October file the learning environment in effect for that time period will be displayed and the user prompted to verify the learning environment. Schools will also be asked to update their status as changes occur.

Data will be obtained from the school level, as this is the best data available. NDE does not have individual student level data for each school and the schools are not required to report this data at the student level.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for PEBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response:

Nebraska is currently developing a plan for Children in Child Care. This information will be submitted later.

6. Benefit Levels

Standard for Benefit Levels

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

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$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:

100% Remote learners:

The average number of days in school for the ten months of August – May is 17.2 or 17 days. Full time remote learners will receive a benefit for 17 days each month. This totals \$116 per month. (17x\$6.82=\$115.94, rounded up to \$116)

Hybrid /Split (50%):

Since data is not available on individual students' attendance or temporary school closing for cleaning, a simplifying assumption will be used for students attending a hybrid/split school.

Based on the best available data, a split schedule will be assumed to be a 3/2 schedule.

Meaning that students in a split schedule will be in school three days one week and two days the next week. This is based on Nebraska's two largest school districts (Omaha Public Schools and Lincoln Public Schools) defining their split schedule as three days one week and two days the next. These two school districts will make up the majority of the students receiving P-EBT benefits. Therefore, students in a split schedule will receive benefits for 9 days rather than the full 17 days per month. This will apply to all categories of students

including SNAP, non-SNAP, public, and non-public. It will be assumed that for the hybrid/split schedules benefits would be calculated at 50% of the 100% remote benefit amount, this would be nine (rounded up from 8.5) days each month for those doing the split. This totals \$62 each month for hybrid students. ($9 \times \$6.82 = \61.38 , rounded up to \$62.) Using the 50% rule will also allow us to capture those children that may be out due to school cleanings and other temporary quarantines. Nebraska has many school districts that remain in full-time in-person status. However, many of these schools will have individuals or classrooms that require quarantine. Due to there being many different scenarios related to adjusted school schedules, Nebraska believes allowing this standard hybrid amount will provide the most equitable amount of benefits to all affected households without having to have specific individual data.

Each school district has a slightly different number of days due to holidays, in-services, etc. An average monthly number of school days was determined based on each school districts' calendar. The number of school days for the months of August through May vary from 11 to 20 days. In an effort to simplify the issuance amount, the average number of school days was determined based off the monthly number of days. This is an average of 17 days in school each month. Therefore, for those students that are doing 100% remote learning, the benefit will be for 17 days each month. For the hybrid/split schedule, 50% of the 100% remote learner schedule will be used to determine the benefit amount. 50% of 17 days is 9 days. Using the 50% will account for those students that are doing a 3/2-hybrid/split and will account for any students that would be home due to quarantine and are not participating in 100% remote learning. Again, this will allow for a consistent monthly benefit amount for those that are 100% remote learning and those that are doing a hybrid/split schedule of any kind. This will also account for any special circumstances such as staff shortages, time off to clean buildings, or individual classroom closures. This proposed statewide average was informed by the most frequently used hybrid learning models and accounts for holidays and vacations.

Based on information provided by the school districts, NDE and DHHS will reassess the hybrid/split schedule at least every two months. Using this information, NE will account for potential new hybrid/split schedules and assess impact on the statewide average benefit amount. If the hybrid/split schedule amount is determined to need adjustment, NE will work with FNS to adjust the benefit amount, as needed.

Average number of days each month used to arrive at standard amount:

Month	# of Days
August	11
September	20
October 2020	20
November 2020	17
December 2020	14

January 2021	18
February 2021	18
March 2021	19
April 2021	20
May 2021	15

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State’s plan (Day #0).
- The timeline must include the State’s tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States’ ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.

- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response:

Estimated timeline:

- Day 0: Approval received from FNS
- Day 1-5: Communication goes out to school districts. This communication includes P-EBT eligibility requirements, directions for uploading student files, and directions for reporting school status/schedule changes.
- Day 7: P-EBT benefits issued for Round 2 corrections.
- Day 5-10: Public information campaign begins.
- Day 5-30: Schools provide information to NDE
- Day 30-35: NDE provides lists to DHHS to begin processing for benefit issuance.

In addition, Nebraska has developed the proposed schedule to obtain data from the schools⁵:

April 5	Schools upload lists and operating schedules
April 5 – 15	NDE prepares lists and DHHS receives lists and prepares for issuance
April 15	Benefits issued (October/November)
May 5	Schools upload student lists and operating schedules
May 5 – 15	NDE prepares lists and DHHS receives lists and prepares for issuance
May 15	Benefits issued (December/January)
June 5	Schools upload student lists and operating schedules
June 5 – 10	NDE prepares lists and DHHS receives lists and prepares for issuance
June 15	Benefits issued (February/March)
July 5	Schools upload student lists and operating schedules

⁵ This schedule will be adjusted dependent on final approval from FNS.

July 5 – 10	NDE prepares lists and DHHS receives lists and prepares for issuance
July 15	Benefits issued (April/May)
August 5	Schools upload student lists and operating schedules
August 5 - 10	NDE prepares lists and DHHS receives lists and prepares for issuance
August 15	Benefits issued (clean up)

Nebraska will continue to use the white and black P-EBT card that was used with previous P-EBT issuances. P-EBT cards will be issued to all families that are not actively receiving SNAP benefits and to existing EBT cards for active SNAP families. Non-SNAP families will receive a new P-EBT card regardless of prior card issuances. P-EBT benefits have not been issued through the eligibility system so it is not possible to add funds to previously issued PEBT cards. However, moving forward, additional benefits will be placed on P-EBT cards that are initially issued for Round 3.

Nebraska will continue to distinguish P-EBT from SNAP and DSNAP in the same manner as the previous rounds. A sub-benefit type of P-EBT will be used for the issuance files. The spend priority and P-EBT expungement rules will remain the same as in previous rounds. PEBT will be spent first, ahead of any existing authorizations, and regular SNAP expungement regulations will be followed.

Returned P-EBT cards will be handled the same as in previous rounds. The cards are returned to the states issuance and collection department. Once returned cards are received, clients are contacted to obtain the correct mailing address so that the card may be issued to the correct address. In addition, replacement cards may be requested through the card vendor, FIS or the state may make the request on behalf of the client.

The proposed timeline has been developed in cooperation with FIS, Nebraska’s EBT processor, and all relevant State agencies. Adjustments may be made to the proposed timeline as needed.

8. 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 PEBT households.

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

Response:

Nebraska established a specific email box for P-EBT related questions and concerns and SNAP Program staff monitor this mailbox. In addition, the ACCESSNebraska phone line will be updated so that a specific group of staff will answer P-EBT specific questions and concerns. This will ensure questions are answered in a timely manner. The helpdesk at NDE will also be available to help schools with technical questions when it comes to uploading the requested data.

To help serve groups with potential access problems, Nebraska will utilize our SNAP Outreach partners and other community agencies to help provide information and assist these populations. Materials will be developed in multiple languages and provided to agencies that will be helping with distribution of information.

The state will conduct a public information campaign using websites (DHHS and NDE) and social media platforms. Nebraska will issue press releases to target statewide and local news organizations. The state will work with schools and community agencies to push out template flyers, emails, and possibly text messages.

Direct messaging: P-EBT eligible families will receive information regarding P-EBT through their schools as well as through the public information campaign facilitated by DHHS and NDE. Each P-EBT card will contain an insert that contains information about PEBT benefits and card usage. Nebraska eligibility staff will also be aware of necessary PEBT information so that it may be discussed with families as they call in to check on their benefits. Information will be provided to SNAP and non-SNAP households in the same manner.

Any disputes of eligibility or issuance errors will be addressed, as they become known. Clients will have multiple avenues to report grievances. Both NDE and DHHS will work with families to ensure understanding of the program and that accurate benefits are issued. NE will work to ensure all families are treated with dignity and respect while working to resolve all disputes and issuance errors. NE will have the ability to issue corrections to benefit amounts either at the time of the next regularly scheduled issuance or create a separate issuance as needed.

Clients who do not wish to receive P-EBT benefits will be provided with information on how to dispose of the card. This information will be included with the card insert sent to the household.

Public inquires related to P-EBT benefits may be directed to the following email address or phone numbers:

Email: DHHS.NebraskaPEBT@nebraska.gov

Phone: 800-383-4278 or 402-471-9043

9. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for PEBT 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]

Nebraska does not issue P-EBT benefits through our SNAP eligibility system. Any overissuances that are discovered will be handled on a case-by-case basis. Nebraska will ensure that regular SNAP benefits are not used for any over-issuances and will instead use a direct billing approach for these issues if needed.

10. 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.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of PEBT 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.

Estimated cost plan is attached.

12. 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.”

13. 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.

14. Administration of State P-EBT Plan

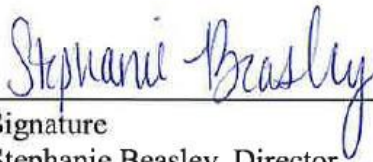
The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:



Sharon L. Davis Administrator Nutrition Services

Signature



Signature

Stephanie Beasley, Director
Division of Children and Family Services

Date of Request:

2/18/2021