

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

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 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:** New Hampshire (NH)
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

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.

Response:

a. This State Plan for New Hampshire Pandemic EBT addresses school age children only. As such, all answers in this plan relate to school children. Should New Hampshire pursue Pandemic EBT for children in child care, the State plan will be amended. The reason for this is to expedite access to Pandemic EBT benefits for school children since NH is already very far into the planning process for this specific population.

The date range covered by this State plan is September 1, 2020 through June 30, 2021. Since the passage of the American Rescue Plan allows P-EBT to continue through the Summer months, New Hampshire will submit a separate State plan for Summer. New Hampshire commits to informing the USDA of any significant increase or decrease in these data points.

b. Estimated monthly and total amount issued to school children in SNAP households:

MONTHLY: \$2,272,091.70

TOTAL: \$22,720,917

This includes all children known to DHHS: SNAP, TANF, Medicaid.

Estimated monthly and total amount issued to school children in non-SNAP households:

MONTHLY: \$602,824.70

TOTAL: \$6,028,247

This includes children previously issued P-EBT in SY 2019-2020, potential applicants on the SY2020-2021 DOE roster, and children not on the DOE data file but eligible for NSLP.

***GRAND TOTAL: \$28,749,164**

*New Hampshire's best estimate is based on the following:

- Total children = 35,377
- Children fully remote 7,075 * 18 days per month * \$6.82 daily amount * 10 months = \$8,685,270
- Children fully on-site = 1,061 * 0 * \$6.82 daily amount * 10 months = \$0
- Children Hybrid 27,240 * 18 days per month * (\$6.82*.60% benefit amount) * 10 months = \$20,063,894.40

c. Estimated total number of children to which the State will issue P-EBT benefits: 35,377 school children

Estimated number of school children in SNAP households: 24,037

Estimated number of children in non-SNAP households: 11,340

d. Estimated total amount of administrative funds that the State needs to complete the work described in this State plan/amendment: \$0.00

e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits)

School children in SNAP households: This category includes students in SNAP, TANF, and Medicaid Eligible households. All of these students will be auto-issued benefits based on the schedule identified in Question 7 “Implementation Timeline”.

School children in non-SNAP households: These include: Previously Issued P-EBT students, Potential Applicants Remaining from DOE Roster, and school children not on the DOE data file but found eligible for NSLP. Previously Issued P-EBT students will be auto-issued benefits based on the schedule identified in Question 7 “Implementation Timeline”. Potential Applicants and school children not on the DOE file but found eligible for NSLP will be processed as they apply online through NH EASY with benefits issued on a monthly basis.

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 2019-2020 graduates and other non-students.

Response: New Hampshire will identify eligible school children and confirm their eligibility for P-EBT using the EOY 2019-2020 and BOY 2020-2021 (most recent) data files provided by the NH Department of Education (DOE). Children identified on these data files will be auto-issued benefit by the NH Department of Health and Human Services as indicated in 3.b. above. Any child who is over the age of 18 will not be automatically issued benefits. If still enrolled in school over the age of 18 (e.g. left back or enrolled with disability), an application must be completed in NH EASY. Any other children not automatically issued benefits will have to apply through NH EASY.

- 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.

Response: All SNAP recipient children will be automatically issued benefits if they were on the EOY 2019-2020 and BOY 2020-2021 (most recent) data files and are age 18 or under. All non-SNAP recipient children who applied for and were issued P-EBT benefits in the 2019-2020 school year, and age 18 or under will also automatically be issued P-EBT benefits. All children age 18 or under in TANF and Medicaid households who can be matched to the EOY 2019-2020 and BOY 2020-2021 (most recent) data files will be automatically issued benefits. In addition, all children that become school age in SNAP, TANF, and Medicaid during the SY 2020-2021 will be identified, cross-referenced to the DOE data file and if matched, auto-issued benefits. Children previously issued P-EBT in SY 2019-2020 whose SNAP cases have since closed, will be automatically issued benefits. Children eligible for P-EBT who did not receive P-EBT in the 2019-2020 school year, including kindergarten, transfer students, and students over the age of 18, will complete a quick application in NH EASY. The information provided on the NH EASY application will be cross-referenced with the DOE data file in real time. If the child is located on the DOE file, P-EBT benefits will be approved with no additional steps needed. If the child cannot be located on the DOE data file due to child becoming eligible for NSLP after the BOY file was created, the applicant will be required to upload a Notice of Eligibility Determination for Meal Benefits that verifies eligibility in the NSLP. Due to the complexity of the manual process and related staff time required, these documents will not be reviewed prior to P-EBT approval. Rather, they will be randomly spot-checked for accuracy by a member of the Customer Service Team.

- 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.

Response: Data is not available on the individual child level in NH. Schools will identify operational status through a survey that will be used to determine benefit amounts per child. The determination will be applied in the same manner for SNAP and non-SNAP-recipient children, and children in public and non-public schools.

- Describe the process that the State will use to update and re-establish each child's in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

Response: Data is not available on the individual child level in NH. Schools will identify operational status monthly through an electronic survey that will be used to determine benefit amounts per school which are then conferred to eligible children enrolled in a particular school.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

Response: Eligibility for P-EBT is considered confirmed if a child is listed within the EOY 2019-2020 and/or BOY 2020-2021 (most recent) NH Department of Education data files or with an uploaded Notice of Eligibility Determination for Meal Benefits in NH EASY. DHHS will confirm eligibility for school-aged children in TANF and Medicaid households by matching child names against the EOY 2019-2020 and/or BOY 2020-2021 (most recent) NH Department of Education data files. New applicants will fall into two categories: 1) students who are not identified in an active DHHS benefit case (e.g. SNAP, Medicaid, TANF) but who are included in the DOE data file, and 2) students who are not identified in an active DHHS benefit case (e.g. SNAP, Medicaid, TANF) who are not on the DOE data file. New applicants for P-EBT to DHHS from NH EASY will be considered eligible if they are located on the DOE data file or by uploading their Notice of Eligibility Determination for Meal Benefits. The uploaded documents will be randomly spot-checked for accuracy. In addition, all children that become school age in SNAP, TANF, and Medicaid during the SY 2020-2021 will be identified, cross-referenced against the DOE data file and if matched, auto-issued benefits. If no match occurs, an application must be completed in NH EASY.

NH DHHS will conduct an electronic survey of schools to collect school operating status. DHHS staff will follow-up on non-responses with a telephone call. The data collected will be compiled and analyzed by New HEIGHTS.

- 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 SA assumes children/families have completed the eligibility process for the NSLP prior to being cross-referenced against the DOE data files (End of Year 2019-2020 and Beginning of Year 2020-2021) that will occur with all auto-issued populations. The DOE data files referred to are the NSLP eligibility files and they are used to identify children eligible for P-EBT benefits. DHHS will also auto-issue benefits to any child in a SNAP, TANF, or Medicaid household who becomes school aged during the 2020-2021 school year if matched by the cross-reference to the DOE data file. If not matched, an application to apply for P-EBT benefits must be completed in NH EASY (e.g. Upon application for P-EBT in NH EASY, a cross reference to the DOE file will be completed and if the child is found on the file, P-EBT will be issued. If the child is not found on the DOE file, then the client needs to upload the proof of SFA eligibility for free or reduced price for school lunch. All eligibility for SFA is completed by the schools.).

This State Plan for New Hampshire Pandemic EBT addresses school age children only. As such, all answers in this plan relate to school children. Should New Hampshire pursue Pandemic EBT for children in child care, the State plan will be amended.

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: See section 6 below for a comprehensive summary.

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 P-EBT 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: This State Plan for New Hampshire Pandemic EBT addresses children in school only. As such, all answers in this plan relate to school children. Should New Hampshire pursue Pandemic EBT for children in child care, the State plan will be amended.

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: According to self-report information from schools via the Administrative Technical Assistance (ATAM) reviews that the NH DOE facilitated, the vast majority of the hybrid school students were learning approximately 2 days in school and the rest of the days were remote learning (3 days remote). The most frequently reported schedule was the enrolled population was divided into two cohorts – Cohort A and Cohort B. Cohort A was in school Monday-Tuesday, while Cohort B was in school Thursday-Friday. Wednesdays were remote learning days for all and the school was cleaned on Wednesdays. Therefore, all enrolled children were remotely learning at least 3 days per week.

Based on this feedback, New Hampshire is simplifying the process by classifying a school with one of the (3) designations below per survey period:

- Fully in person – No benefit
- Hybrid – 60% benefit*
- Fully remote – 100% benefit

*Based on the ATAM survey output described above

The schools will be asked to classify themselves into the categories of “fully in-person”, “hybrid”, and “fully remote” by using the term “majority” as its operational definition.

Benefits are based on a 180-day school year. A constant monthly benefit of 18 days is set for children with fully virtual schedules by averaging the number of instructional days (e.g. 180) across the number of months (e.g. 10) in the school year. A hybrid benefit is calculated at 60% of the fully virtual schedule and there is no benefit for students who attend fully in-person.

New Hampshire has elected to utilize a survey of schools to obtain operational status. At the request of the DOE, the survey will be directed to Superintendents and a contact list will be provided to DHHS by the DOE. This survey does not include information about which children are receiving free and/or reduced-priced meals. Because the monthly operational status will likely be obtained in June, each month of the entire school year will be obtained with one survey submission leaving no need for additional follow-up. The survey results will be used to determine the P-EBT benefit at the school level that will then be conferred to the individual eligible student.

For SAU's or schools that do NOT respond to the survey, NH DHHS will take the average of the responses from the SAU's schools that do respond. This means that if there are 3 schools in a SAU and only 2 reported, NH DHHS would take the average of the 2 reported and give that benefit to the school that did not.

For example:

School 1 - Fully Remote 100%

School 2 - Hybrid 60%

School 3 - didn't report

SAU average is $(\text{School 1} + \text{School 2}) / 2 = 80\%$

If NH DHHS does not get any responses from schools in an SAU, NH DHHS will average Statewide SAU numbers (those who reported) to get an average on that missing SAU (each school within it).

School Operational Status Survey

The data collection for this survey is at the school level capturing:

- Name of the person providing information
- Role
- SAU Number
- Name of School
- Has your school been closed or operated with reduced attendance hours for a minimum of 5 consecutive days? Y or N and if Y, Enter first date of closure, reduced hours, or reduced attendance
- Select the mode of operation of your school (school status) that represents the majority for each of the following months:
 - Fully in-person
 - Hybrid (part-time in-person)
 - Fully Remote
- Secondary questions will appear only for Hybrid
 - Total number of students who were remote during the month
 - Total number of students who were in-person during the month

Simplifying Assumptions: DOE is not tracking attendance data at the child level. Therefore, a survey of schools is needed to obtain operational status. The survey results will be used to

determine the P-EBT benefit at the school level that will then be conferred to the individual eligible student. In addition, NH will randomly spot-check uploaded Notice of Eligibility Determination for Meal Benefits for new applicants in NH EASY. Public information campaign materials will include instructions that will explicitly clarify the eligibility requirement and the types of proofs which are valid. DHHS will also auto-issue benefits to any child in a SNAP, TANF, or Medicaid household who becomes school-aged during the 2020-2021 school year if matched by the cross-reference to the DOE data file. If not matched, an application must be completed in NH EASY.

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.

Response (addresses all 3 bullets above):

- NH DOE provides student data to SNAP State Agency (No later than 3 business days after plan approval);
- Public notice campaign begins (2 business days after plan approval);
- P-EBT information line becomes active (5 days after plan approval);
- First issuance (30 days after plan approval) - See NH Implementation Timeline for Benefit Issuance below;
- Application opens for non-auto-issued households in NH EASY (45 days after plan approval);
- School closures and benefit levels are reassessed (75 days after plan approval);

- Ninety-day application period closes for P-EBT only households in NH EASY (135 days after plan approval).

NH Implementation Timeline for Benefit Issuance

The SA did develop its timeline in cooperation with the EBT processor and all relevant SAs. In addition, the P-EBT State Plan was shared with the EBT processor and discussed in a meeting. Updates are shared in regularly scheduled monthly meetings.

NH Implementation Timeline for Benefit Issuance

- **1st issuance**
 - 30 days after plan approval
 - Auto issuance to all who are eligible (prior P-EBT, SNAP, Children's Medicaid, TANF, etc.)
 - Issuance amount for September AND October
- **2nd issuance**
 - 1 week after first issuance
 - Auto issuance for all who are eligible
 - Issuance amount for November AND December
- **3rd issuance**
 - 1 week after 2nd issuance
 - Auto issuance for all who are eligible
 - Issuance amount for January AND February
- **4th issuance**
 - 1 week after 3rd issuance
 - Auto issuance for all who are eligible or newly eligible
 - Issuance to those who have applied through NH Easy (NH EASY applicants will receive the equivalent benefit of auto-issued children for the months of September through April)
 - Issuance amount for March AND April
- **5th issuance**
 - 1 week after 4th issuance
 - Auto issuance for all who are eligible or newly eligible
 - Issuance to those who have applied through NH Easy (NH EASY applicants will receive the equivalent benefit of auto-issued children for the months of September through June)
 - Issuance amount for current May and June
- **6th issuance**
 - 1 week after 5th issuance
 - Auto issuance for all who are eligible or newly eligible
 - Issuance to those who have applied through NH Easy (NH EASY applicants will receive the equivalent benefit of auto-issued children for the months of September through June)

- **Additional issuance as needed monthly thereafter until on or before September 30th 2021.**

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?

Response: SNAP households and TANF recipients will receive P-EBT benefits on their current EBT Card. Non-SNAP households and Medicaid households will receive P-EBT on unique P-EBT cards. TANF households that do not already have an EBT card will receive a P-EBT 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.

Response: P-EBT benefits are issued using a unique benefit code.

- 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.

Response: P-EBT benefits have a spend priority of 1.

- 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.

Response: P-EBT benefits follow the same expungement timeline as regular SNAP 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?

Response: Due to NH's application process, we did not have a large volume of P-EBT cards returned to the vendor. Only 2.2% of all P-EBT cards issued were returned. Undeliverable P-EBT cards will be returned to the vendor, who will then drop ship them monthly to the State. Once they arrive at the State, they will be deactivated and destroyed. It will be up to the P-EBT household to call for replacement cards and to make any needed address updates.

- Will you issue *new* P-EBT cards to existing P-EBT households?

Response: No

- If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?

Response: N/A

- If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: If the P-EBT recipient no longer has their P-EBT card, they will call to order a replacement through EBT Customer Service.

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 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.

Response: NH has created a Customer Service Team (CST) and identified 8 staff members to perform various customer service functions. The CST includes: 5 Family Services Specialists (FSS), 2 administrative support staff, and one part-time SNAP EBT program staff. The FSSs will primarily work the P-EBT information line with support as needed from administrative staff. These staff will be using New HEIGHTS and Edge to answer incoming calls regarding incorrect benefit amounts, benefit denials, and to provide general information on how to apply for P-EBT. A list of FAQs will be provided to the CST based on previous experience and the new State Plan design. In addition, the SNAP EBT staff member will be available to spot-check verification documents uploaded into NH EASY and follow-up with applicants and/or provide a list to the other CST staff members to contact applicants as needed. An Excel spreadsheet will include all cases that are randomly spot-checked for verification and the related communication detail of efforts made to resolve issues.

- 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.

Response: It is assumed that these households will be able to apply for P-EBT benefit online. The online NH EASY application is available in several different languages.

- 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).

Response: DHHS Public Information Office (PIO) will make P-EBT information available on the DHHS website. PIO will construct and release a press release indicating that P-EBT will be available statewide. In addition, a flyer will be shared with over 30 community organizations that participate in a bi-weekly Food Access Coalition meeting which is attended by the SNAP Administrator. These organizations will be able to distribute the flyer to their mailing lists or post on their websites. The flyer will include a pull down date to coincide with the pull down of the NH EASY P-EBT application. Informational flyers and a parent letter will be distributed by the SAUs informing families of the program. There is also a letter for Superintendents that explains what P-EBT is and how families can participate.

- 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?

Response: NH will generate a notice once P-EBT benefits are issued to all households. The notice will contain all pertinent information in the bulleted list above. Non-SNAP households will receive a buck slip with their P-EBT card, which also includes all information in the bulleted list above. If a household was auto-issued benefits that they do not wish to accept, the buck slip indicates that the P-EBT card should be destroyed.

- 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.

Response: NH intends to provide notification and buck slips to those issued P-EBT benefits. Informational flyers and a parent letter will be distributed by the SAUs informing families of the program and how to apply.

- Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: Yes, NH's PIO will provide P-EBT information on the DHHS website.

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 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: There are two ways the State may identify over-issued P-EBT benefits:

- Self-report; and
- Application spot-checking.

In both instances, if it is discovered that P-EBT benefits were over-issued in any amount, a referral will be sent to the EBT unit and any unspent P-EBT benefits will be removed from the EBT account and a receipt will be mailed to the P-EBT recipient. Over-issued benefits that cannot be repaid will be reported on the FNS 46 Report.

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 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.

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:

Cheri F. White Administrator

Signature
Print Name and Title

Maureen Burke-LaRue
Maureen Burke-LaRue

Signature
Maureen Burke-LaRue, M.S.Ed., Administrator III
NH Department of Health and Human Services

Date of Request: May 20, 2021