

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

<b>Issuing Agency/Office:</b>	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
<b>Title of Document:</b>	Arizona State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
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<b>Date of Issuance:</b>	January 29, 2021
<b>Replaces:</b>	N/A
<b>Summary:</b>	(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).
<b>Disclaimer:</b>	<b>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.</b>

*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: Arizona

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*<sup>1</sup> 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.*

**Response:**

- a. The *date range* covered by this State plan or amendment
  - for children in school: August 2020 – May 2021
  - for children in child care: October 2020 – May 2021
- 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.
    - i. **Monthly: \$20,982,401**
    - ii. **Total: \$209,824,010\***
  - Estimated amount issued to school children in non-SNAP households
    - i. **Monthly: \$29,551,550**
    - ii. **Total: \$295,515,495\***
  - Estimated amount issued to non-school children in child care
    - i. **Monthly: \$16,368,300**
    - ii. **Total: \$130,946,400 – with October 2020 Start**

\*Full Benefit/Partial Benefit/No Benefit estimated using best available factor data from ADE as of 02/03/2021
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
  - Estimated number of school children in SNAP households
    - i. **262,000**
  - Estimated number of school children in non-SNAP households
    - i. **369,000**
  - Estimated number of non-school children in child care
    - i. **134,304**

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<sup>1</sup> 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.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.<sup>2</sup>

**\$14,347,000** Administrative funds needed to administer and support program through Sept 30, 2021

- State FTE Costs
- Mailing Costs
- School Flyer about program
- FIS EBT Support and Payments
- Call Center Support
- Arizona Department of Education (ADE) Passthrough
- Special AZDES Unit to handle P-EBT calls Call Center can't support
- Other Costs to consider

- 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

As data arrives from ADE, daily/weekly, P-EBT cases will be set up depending on the secure mechanism and transfer schedule used for data sharing. Arizona will issue monthly P-EBT benefits retroactively for all months. Children and cases which are set to pay by the 15th of the current month for previous months payments will be included\*. AZDES will use the last name of the case to stagger the P-EBT issuance over a 13 day period. AZDES has found that regular SNAP issuance purchases peak by the 13th of every month; therefore, we propose to start the P-EBT staggered issuance after the 13th of the month in order to avoid an overlap with SNAP issuance or food inventory issues for retailers. Any children added after that date will be included in the next monthly issuance cycle assuming the school learning plan is known and the case is set up for payment. If there is an influx of student data after issuance starts, AZDES at its option may conduct special catch up issuances from time to time during the program period after May 2021. Unless extended by FNS and excluding fall 2021, P-EBT final issuance is scheduled for September 15, 2021.

\* See issuance schedule in project plan later in this document.

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<sup>2</sup> Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

#### 4. P-EBT for School Children

##### A. Eligible Children

*Standard for P-EBT Eligibility*

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

- 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:
  - directly certified or determined "other source categorically eligible" for SY 2020-2021, *or*
  - certified through submission of a household application processed by the child's school district for SY 2020-2021, *or*
  - enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
  - 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.
- 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 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.**

For the HR 8337 P-EBT program, AZDES will build its school population list from the current student population supplied by ADE using data for 2020/2021. The prior school year (2019/2020) data will only be used to fill in missing NSLP enrollment when the current year NSLP data is not supplied or missing due to not being collected since many schools are running a summer food program. Only students in the 2020/2021 enrollment data sent by ADE will be eligible. This will account for graduates and other changes in student enrollment. In order to limit the amount of new EBT cards issued, the 2019/2020 data will be used to determine if an existing P-EBT case was created for the child or if they are on a current SNAP case. If a household has discarded or lost their EBT card they can use the same process as existing SNAP customers to obtain a new one. This includes requesting a replacement EBT card through our EBT portal or calling the EBT vendor for a mailed card. AZDES will include in correspondence and the FAQ section of the Arizona P-EBT informational site how to receive a replacement card ahead of the first issuance.

- **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.**

ADE to determine NSLP/SBP, provision 2, provision 3, CEP status (Base year and Non Base Year) using submitted national school lunch applications.

When there is no NSLP application for a student, ADE and AZDES will direct parents and guardians to fill out and submit a NSLP free and reduced lunch application or alternative income form. AZDES will also confirm if the child is currently on SNAP.

If the SNAP case passed by ADE is still open and the child is participating, AZDES will use that case or current SNAP case if found; otherwise, AZDES will check if they have a P-EBT case already setup. If neither is true AZDES will set up a new P-EBT case and issue an initial P-EBT card through the mail. When a parent/guardian inquires as to not receiving a payment and AZDES is unable to locate either the student in the current student file or the NSLP indicator the parent/guardian will be referred back to the local school to complete or correct an NSLP application or alternative income application.

ADE will also make an effort to provide current foster information, where flagged, as those children have a tendency to move and often have guardianship changes. Foster children in 2020/2021 will have a new P-EBT only case created "Per child" and P-EBT card created and addressed to "guardian of child name" issued through the mail. AZDES will also send a letter to that same address with information on the P-EBT program and how to create a PIN for their card. The P-EBT card should follow the child if placement setting changes during the program.

Newly eligible school children will be set up and paid from the beginning of the school year August 2020 to the latest month available for payment in the issuance section. Newly eligible children for the 2020/2021 school year will be monitored for by ADE through September 15th, 2021.

- **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.**

For SNAP/Non-SNAP and Children in public and private schools, they will all be treated the same. ADE will provide AZDES a file designating every school in Arizona as In-person, Closed, Distance, and Mixed (Access Flag 2 schools) (See grid 1-1 below) Schools and School Districts will be responsible for maintaining the learning model data for the school year.



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

ADE will establish a portal for School and School Districts to upload their monthly learning plans at the school level. AZDES will use the learning plan designation as the basis for payment. Children will not be paid when their school is missing the learning model data for any given month. Schools and School Districts will have until the end of June 2021 to update the portal.

- **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).**

**Roles & Responsibilities:**

- ADE will be responsible for identifying children currently attending at schools and if they are NSLP eligible, updating address/eligibility/parent/school information for public and non-public schools based on submitted NSLP applications.
  - ADE and Schools/School Districts will be responsible for identifying each school's learning model and status and providing this data to AZDES for determining P-EBT benefits for every month of the program.
  - AZDES will be responsible when the NSLP flag is missing for a child and will then match against previous year 2019/2020 data and update if found for the initial bootstrap process only. After which, AZDES will rely on the ADE NSLP indicator.
  - AZDES will also append cards/cases which were used in a previous year to avoid a new case setup and card issuance where it might not be needed.
  - AZDES will reissue a P-EBT card on Non-SNAP or EBT card on SNAP cases where clients have lost or disposed of their P-EBT card from the spring P-EBT issuance. AZDES and ADE will have campaigns to provide educational information to P-EBT families on safeguarding and saving their P-EBT cards.
  - Parents/Guardians will be responsible for turning in a complete and accurate NSLP application to the school if they wish to claim a P-EBT benefit
- **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.**

**Grid 1-1**

ACCESS FLAG	In one day, the learning models offered to all students:	Daily Amount of P-EBT
1	Distance	Full
1	Closed, Distance	Full
1	Closed, No learning	Full
2	Mixed	Partial (Full EBT x State Averaged Factor*)
2	Simultaneous learning models offered in any combination: in-person, mixed, distance:	Partial (Full EBT x State Averaged Factor*)
	In-person + distance	
	In-person + distance + mixed	
	In-person + mixed	
	Mixed + distance	
3	In-person	None

Access Flag sent to AZDES by ADE determines payment level for the school:

- 1 = Full Benefit
- 2 = Partial Benefit
- 3 = No Benefit

**Definitions:**

- Under Access Flags 1 and 3 there is no choice – everyone is either fully distance or fully in-person.
- Under Access Flag 2, there is a mix of in-person and virtual learning.

**Benefit levels:**

1. Schools that offer only one Access Flag model for the entire month will be assigned to that Access Flag, and the school’s free and reduced-price children will receive the P-EBT benefit corresponding to that Access Flag.
2. Schools that switch models during the month will be classified as follows:
  - A. If there are more Access Flag 1 days in the month than Access Flag 2 or 3 days, then the school is Access Flag 1 for the month.
  - B. If there are more Access Flag 2 days in the month than Access Flag 1 or 3 days, then the school is Access Flag 2 for the month.
  - C. If there are more Access Flag 3 days in the month, but there are at least some Access Flag 2 days or Access Flag 1 days, then the school is Access Flag 2 for the month.

\*This Learning Model Data is self-reported to the Arizona Department of Education by superintendents of each school district and individual charter operators and may not be complete. Incomplete and missing learning model information marked data unavailable will not be considered. School district superintendents and individual charter operators will have until the end of their 2020/2021 school years + 1 month to provide missing data to be considered for payments during the 2020/2021 school year P-EBT benefits timeframe. ADE will continue requesting missing/incomplete data until September 2021 as needed.

ADE currently has no solution in place to collect individual learning plans at the child level and building such a system is estimated to be longer than the current Federal Fiscal Year 2021. Predominantly schools offer more than one school learning model during the school year. Our best available data will be collected at a school level learning models made available to the households. It is not feasible on our time constraints to collect which learning model is selected on a student level. Due to time constraints and the nature of the emergency we are proposing keeping learning plans at the school level.

With these simplifying assumptions Arizona believes we can issue benefits automatically and quickly to SNAP and Non-SNAP households without the need for parents and guardians to use a portal before getting a benefit. For schools who offer more than one learning model to their enrolled population, ADE will assign the school an Access Flag 2 (see table above) which provides a partial P-EBT benefit to allowing Arizona to distribute benefits quickly to the entire eligible population without having parents report which individual learning model was selected.

## **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:

- 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.
- 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.).
- 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:**

Confirming school status will be determined by ADE as the FIRST time closures or reductions happen in the plan timeframe starting in August and will be in force until the end of the plan or school year for spring 2021 – an amendment will be added if ADE/AZDES needs to account for fall 2021 - ADE will then review school status every 2 months or more often as FNS guidance suggested once the threshold is met to monitor eligibility for the schools and benefit levels. This will be accomplished by having school districts report status to the state in a yet to be built web portal. Since all schools were closed the minimum 5 days in August 2020 (See Executive Order [2020-51](#)) this will be issued in Part 1 detailed later in this section. ADE/AZDES will not be able to start Part 2 issuances after August until we are able to collect school status information for September 2020 onward.

- AZDES will only be issuing benefits for previous months and never the current month. This approach will lock in the status of the school for the months we do pay.
- ADE will have school district superintendents and individual charter school operators self report status at least bi-monthly to determine if schools within those district and charter units are eligible for P-EBT as well as determine the submissions final disposition (In-Person, Distance, Closed, Mixed (Access Flag 2 schools)).
- This Learning Model Data is self-reported to the Arizona Department of Education by Arizona's school district superintendents and individual charter operators and may not be complete. Incomplete and missing learning model information marked Data Unavailable will not be considered eligible for payments. Superintendents and individual charter operators will have until the end of their 2020/2021 school years + 1 month to provide missing data to be considered for P-EBT benefit payments.

**Part 1 August 2020 Payment**– ADE will identify 100% **Closed** learning schools and children NSLP eligible for August 2020– AZDES and ADE will develop a payout for August 2020 and pay known children enrolled in 2020/2021 flagged as NSLP eligible for the full P-EBT benefit. If NSLP data is missing ADE will look at 2019/2020 NSLP data to see if the child provided in the 2020/2021 school year by ADE is eligible. The idea is to ride on the rails of the existing P-EBT system from the spring and deliver benefits with minimal changes as soon as possible as we recognize the need to get relief benefits as quickly as possible into our community. Paying 1 month also helps with program integrity by only releasing a limited amount of funds and being able to check that the systems are performing as expected. This also allows us to implement a good public information campaign and get letters out about the P-EBT program.

**Part 2 September 2020-May 2021 Payments**– This will also include any late arriving districts and schools that are NSLP eligible and did not receive an issuance for August 2020. AZDES will then generate payments for existing P-EBT children based on that information supplied for the designated learning plan for the school, and NSLP flag for months up to the previous month including August if not previously issued. If a child is not NSLP certified for 2020/2021 or 2019/2020 in the data provided to AZDES from ADE, the student’s family will need to go to their local school and submit a NSLP application for consideration into the P-EBT program.

If a family has lost their card, AZDES will supply a IVR/hotline number and website where they can request a replacement card. The Benefit Level Section of this document will outline the simplifying assumptions to determine the benefit payment. AZDES will include in correspondence how to receive a replacement card.

Making simplifying assumptions will enable Arizona to begin issuing relief much sooner and along a similar timeline as our Spring 2020 effort, as we will be able to reuse most the existing infrastructure, programming and established links.

## 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:

- The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
- 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.)
- 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:**

Arizona Revised Statutes Title 15. Education § 15-821, A child is eligible for admission to first grade if the child is six years of age. A child is deemed six years of age if the child reaches the age of six before September 1 of the current school year.

AZDES will identify all SNAP children under 6 years old receiving SNAP benefits starting October 1, 2020, and deem them categorically eligible using our benefit eligibility system, AZTECS.

AZDES will identify these children by their county of residence. Only residents who reside within the State of Arizona and intend to remain in Arizona are eligible for SNAP and will be eligible for the childcare benefit.

The scope of “in the area” is to mean the 15 counties within Arizona and as such will be a single designated school every month starting October 2020 - May 2021 for child care purposes in each county.

Arizona will use the same school learning model data collected by ADE for P-EBT Children in School.

AZDES will use the SNAP eligibility system to determine the benefits received using existing processes in place that conform with SNAP privacy requirements.

AZDES will cross-reference this population with any children submitted by ADE to ensure a given child does not receive duplicate benefits. Child care benefits will trump school benefits in the event of an overlap for October 2020 till the end of the program.

AZDES will issue a letter to households letting them know benefits will be arriving.

Newly eligible childcare children will be paid from October 1, 2020, to the latest month available for payment per the issuance schedule on their existing SNAP case.

Newly eligible children will be monitored monthly until the end of May 2021.

Arizona's simplifying assumption would then be if there is one either Closed or Distance school within any area of each county for each month between October 2020 and May 2021, the child care P-EBT children would be eligible for the Full P-EBT Benefit. If in any month between October 2020 and May 2021 there is not a Closed or Distance school, Arizona would then use one school reporting a Mixed (Access Flag 2 schools) learning model within any area of each county for each month between October 2020 and May 2021, the child care P-EBT children would be eligible for the Partial P-EBT Benefit. Designated schools and learning models will be tied to child records via county code and reportable. These assumptions will quickly allow Arizona to distribute benefits to the SNAP under 6 population as well as streamline administration and time required to implement.

Arizona is making this simplification after considering the age and constraints of our legacy eligibility system, that Arizona schools allow parents to enroll their children in schools other than their designated school using variance waivers, and the number of charter schools that overlap boundaries with our public schools. Arizona would not be able to accurately and expediently determine which school is the correct school for either the child's residence in our eligibility system.

## 6. Benefit Levels

### *Standard for Benefit Levels*

- 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:**

**Simplifying assumption:** For Schools deemed Closed or Distance for the month, AZDES will automatically pay a 100% P-EBT benefit for the month minus holidays and weekends for children deemed eligible for the benefit.

For mixed learning models (Access Flag 2 schools), monthly partial payouts will be off the full benefit and are simplified and based on the following:

**Formula:**

September - February Benefit- Use 60% partial benefit of given month FULL benefit using sampling results

March Benefit- Readjust partial benefit for March based on March Mixed (Access Flag 2 schools) percentage statewide if the change is greater or less than 10% using the data provided by ADE for the month from all Mixed (Access Flag 2 schools)

April Benefit- Readjust based on March Mixed (Access Flag 2 schools) percentage statewide if change is greater or less than 10% using the data provided by ADE for the month from all Mixed (Access Flag 2 schools)

May Benefit- Readjust based on April Mixed (Access Flag 2 schools) percentage statewide if change is greater or less than 10% using the data provided by ADE for the month from all Mixed (Access Flag 2 schools)

June Benefit- Readjust based on May Mixed (Access Flag 2 schools) percentage statewide if change is greater or less than 10% using the data provided by ADE for the month from all Mixed (Access Flag 2 schools)

Readjustment can take place for partial benefits and learning models once AZDES starts receiving data from ADE school portal which goes live in March 2021.



For the initial sampling, ADE/AZDES researched each school district's calendars, documented each month's holiday and break dates, then averaged to determine the best start date, end date, and number of school days per month. ADE/AZDES used the base schedule of two days in person and three days distance\* to determine the 60% monthly partial variable, and used that to calculate the number of distance days in order to determine a monthly partial allotment amount until ADE's learning model data was available in the portal. The mixed schedules in the surveyed schools are a reasonable reflection of actual mixed schedules using best available data. AZDES will reassess the average monthly partial benefit with updated data provided from ADE.

**Sample used from (80 schools = 3 days, 33 schools = 2 days, 27 schools = 5 days, 7 schools = 6 days, 3 schools = 4 days. Result: 3 days used in calculations)** as ADE doesn't currently collect student level plan data at the state level. This status will be easier to report and consistent across schools and updateable month to month. AZDES anticipates fewer help desk calls and confusion. AZDES will have consistent payouts across schools and districts simplifying administration and auditing of payments.

\*As ADE submits learning model data to AZDES this base schedule partial payments are based on and will be evaluated every other month after initial August issuance and the partial benefit adjusted if needed for those months.

Benefit options with benefit level will be the same across all schools/districts in the State:  
**Full Benefit, Partial Benefit, No Benefit.**

Arizona P-EBT Allotments 2020 - 2021

149 School Districts sampled

P-EBT START DATE: Aug 10, 2020

P-EBT LAST DAY OF SCHOOL YEAR: May 27, 2021

**Benefit Table:**

Monthly Statewide Amounts:				
	<u>Full Days</u>	<u>Full Payment</u>	<u>Partial Days</u>	<u>Partial Payment*</u>
August	16	\$109	10	N/A
September (exclude 1 holiday)	22	\$150	13	\$90
October(exclude 5 days fall break)	17	\$116	10	\$70
November(exclude 1 holiday, 3 days Tha	17	\$116	10	\$70
December 9(Excludes 9 days Christmas	14	\$95	8	\$57
January(Excludes 1 day, 1 Holiday)	19	\$130	11	\$78
February(exclude 2 days for holiday/mic	18	\$123	11	\$74
March(exclude 5 days spring break)	18	\$123	TBD	\$TBD
April(exclude 1 holiday)	21	\$143	TBD	\$TBD
May	19	\$130	TBD	\$TBD
<b>Totals:</b>		<b>\$1,235</b>		<b>\$TBD</b>
Child Care Totals:		<b>\$976</b>		<b>\$TBD</b>
TBD- To Be Determined based on School Plan Data				

## 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:**

**Proposed Arizona Milestone Plan:**

Milestone	Business Day	
Draft Plan	-45	
CA Developed with FIS/IGA with ADE	-14	
Approval FNS State Plan	0	
ADE Provide 2020/2021 NSLP Eligible Data	30	NSLP = Y or attending
AZDES or ADE to use 2019/2020 NSLP flag data on records missing NSLP	35	Use to fill in gaps and add Case/Card numbers to Child Records
ADE Provide 21/21 School Status for August	35-38	In-Person,Mixed (Access Flag 2 schools) 100% Distance, Closed
Signed CA with FIS/FNS/State	15-20	
AZDES prepare data for August Issuance	10-40	
AZDES prepare batch program(s) for fall P-EBT	10-40	Load new Benefit amounts, Changes for Foster Care(1 Card per Child), Case Setup retesting
AZDES prepare database for fall P-EBT	10-30	Need to move tracking file to ADABAS
AZDES test in UAT environment	15-25	
AZDES signoff	10	
AZDES Prepare Hotline	25	
Hotline - Agreement	20	
Hotline-Establish/Re-establish call in number	25	
Hotline - Update - Address, Demographics, email/phone, etc.	30	
Hotline-Reissue P-EBT Card?	30	
Hotline- Send to Level 2 for Issuance resolutions/issues that can be resolved	30	
P-EBT hotline becomes active	30	
Public information campaign begins	15	
ADE bulletin to Schools	15	
AZDES bulletin to Local Offices/Field Staff	15	
AZDES PIO office - Social Media/Press Release/News OutReach	30	
AZDES - Food Bank Flyer and possibly more	30	
2021/2022 school year	TBD	If needed
<b>Issuance schedule**:</b>		If data and systems are ready, first issuance in February may be possible. Otherwise March 15th will be the regular start of issuance. If required data is delayed then the schedule may push to the following month as needed
March 18th	41	Issue <b>Child Care Benefits first for October</b> (Issued by Last Name - See Table Below) - send letters

April 15th**	72	Issue Up To <b>November</b> and New Arriving Child Care and Issue School Children (Issued by Last Name) send letters to first time issuances
May 15th**	102	Issue Up to April and New Arriving Child Care and School Children (Issued by Last Name)
June 15th	133	Issue Up to May and New Arriving Child Care and School Children (Issued by Last Name)
July 15th	163	Issue for any late arriving data School Children 2020/2021 + Start accepting potential underpay disputes from Parents/Guardians
August 15th	194	Issue for any late arriving data School Children 2020/2021
September 15th	225	Final catch up Issuance for 2020/2021 school year if needed
End of Program		September 30th unless extended by FNS

**\*ADE is not currently collecting monthly school level status information if the school is Closed, Mixed, Distance - Until we can reliably get that information from Schools to ADE to AZDES we will not be able to start issuance past August 2020 until we have that minimum data without further simplifying assumptions**  
**\*\*Split Issuance timing will be done with the Arizona Retailers Association to coordinate food availability.**

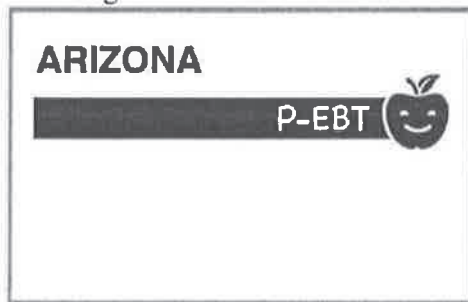
**P-EBT Issuance Schedule by Case Last Name:**

<b>Last name's first letter is</b>	<b>Benefits available</b>
A or B	15th of the month
C or D	16th of the month
E or F	17th of the month
G or H	18th of the month
I or J	19th of the month
K or L	20th of the month
M or N	21st of the month
O or P	22nd of the month
Q or R	23rd of the month

S or T	24th of the month
U or V	25th of the month
W or X	26th of the month
Y or Z	27th of the month

Please also address each of the following:

- **Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?**
  - AZDES and FIS will follow previous programming and issue P-EBT cards to P-EBT only cases and AZDES EBT cards to SNAP cases where possible.
- **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 does the P-EBT card look like for households who are not currently receiving Nutrition Assistance?



- AZ will continue to use FSPV as the P-EBT issuance subtype code to identify P-EBT issuance – with our simplifying assumptions and tracking we anticipate being able to identify the P-EBT benefits.
- **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.**



- FSPV will be drawn priority 1 followed by SNAP using what was programmed in the spring.
- **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.**
  - AZDES will send out a notice of expungement to participants at the 90 day mark
  - AZDES will expunge based on the SNAP rules at the time of the expungement
  - Once P-EBT benefits are expunged they WILL NOT be reissued under any circumstances
- **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?**
  - ADE will make an effort to obtain better mailing addresses especially for rural areas of the state which sometimes require PO Boxes.
  - AZDES will review ADE data to ensure known issues are not repeated for areas impacted by incorrect addresses last time.
  - AZDES will offer a Hotline for parents/guardians to call and update their address information so another card can be sent.
  - Cards returned to the EBT processor will be destroyed and reported to the state as undeliverable.
  - Undeliverable cards will be followed up on if ADE provides sufficient contact information using the existing undeliverable card report process.
- **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?**
    - AZDES will issue NEW P-EBT cards to P-EBT only cases that are “NEW”.
    - Existing P-EBT households who have discarded or lost their P-EBT card can call into the Hotline or request another P-EBT card using the established facilities provided by FIS our EBT Processor: EBTEdge, EBT IVR or the EBT Mobile App. AZDES will include in correspondence how to receive a replacement card if they no longer have it. We had on our P-EBT website to retain the card in the FAQs and families that kept them can start using quickly and not have to wait for the production and mail process.

- In addition when those methods fail, households can call the Hotline and level 2 support will be able to reissue a P-EBT card and Instruction Letter when needed so recipients have the information to establish a PIN and use the card.
- **If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?**
  - AZDES will offer instructions for this scenario on it's P-EBT information landing page
  - AZDES will offer the same card replacement processes that are in place for the existing SNAP clients: EBTEdge, EBT IVR or the EBT Mobile App or level 2 support.

## 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.

- USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
- USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will

provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to 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:**

- AZDES will maintain a PO Box for handling disputes for guardianship on cases already built:
  - PO BOX 19009 Phoenix, AZ 85005
  - Items that will be considered proof of custody: Judicial decree, court documents, will, enrollment paperwork, affidavit of guardianship
  - If case is not already built, the Parent/Guardian will be directed to fill out or submit a corrected NSLP application at the local school
- AZDES Hotline will handle
  - General questions, FAQs, Case Lookup/Payment Expectations
  - Address updates
  - Benefit lookups

- Benefit Underpayment referrals/logging
  - Refer parents/guardians to PO Box for parental disputes
  - Referrals to Level 2
- AZDES Hotline will refer general disputes or issuance errors to CLU (Client Liaison Unit) or Level 2 P-EBT support team for remediation
  - Ability to reissue cards
  - Add/remove children from cases
  - Update date of birth (DOB) or other demographic information
  - Update Primary assigned to case or update Primary Name
  - Research denials
  - Call Backs/Emails to Beneficiaries
  - Research Payment Disputes - Any underpayments will begin being settled in July 2021 if the parent/guardian feels their child leaning plan deserved the full benefit for a given month. If there is no data provided by the school those claims will be denied.
- If issuance is in error and has been spent, Level 2 support or AZ EBT Team will
  - Refer to Overpayment Unit - See Over-Issuance section
  - Reissue corrected benefits to claimant if not the same individual
  - Keep a log of these events for tracking purposes
- If issuance not spent Level 2 Support or AZ EBT Team:
  - Move to correct case or build a new P-EBT case
  - Direct Parent/Guardian to update/fill out NSLP application at school
  - Keep a log of these events for tracking purposes
- Research needed by ADE
  - Level 2 will submit to AZ EBT team which will contact ADE as needed
    - Missing children from a school
    - DOB issues or other demographic issues
    - Parental disputes that can't be resolved with submitted paperwork
- **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.**
  - AZDES will have a Hotline with Spanish speaking as an option
  - AZDES will address groups with access problems in a variety of ways:
    - Printed material will be available
    - Informational website will be mobile friendly to support clients with phones

- Existing TTY services through our Hotline where needed
  - ADE will also provide overflow support and support local schools/districts with second level support provided by AZDES
- **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).**
  - ADE will provide bulletins to Local Schools and Districts about the program
  - The ADE/AZDES will meet with local media to offer program details and build awareness of the program
  - AZDES Public Information office will design a mobile friendly P-EBT informational landing page with a Q&A section
  - AZDES PIO will issue press releases and social media releases
  - AZDES and ADE will partner with community organizations to market the P-EBT program.
  - Radio and TV spots will be considered by AZDES and ADE
- **Describe the information you will provide *directly* to P-EBT participants (this is different from 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 benefits? 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 PINning 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?**

Information will be provided via the P-EBT Online Information Portal and/or Initial Letter and/or Mass Email-for SNAP and non-SNAP Clients when benefits start to issue.



FAQ and P-EBT landing page will be provided, here is a example of the spring P-EBT page which will be modified to support the 2020/2021 effort:

[AZ P-EBT Landing Page](#)

Example of EBT Brochure that is also on the P-EBT landing Page: [AZ EBT Brochure](#)

- **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.**
  - AZDES will provide letters with PINNING information and general information about the P-EBT program and action items as needed
- **Will you provide information via email, text messages, social media, website, robo-call, and/or other electronic means?**
  - AZDES will provide general program information in email blasts to households that provide email addresses
  - SNAP and non-SNAP households will receive notification of when to expect benefits issued and monthly allotment table for the various learning plans in a welcome letter

## 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:**

AZDES is exploring how best to utilize the existing overpayment claim establishment and collections process to account for P-EBT overpayments. Necessary procedural changes are in process to account for this new population of overpayment and identification of the type of SNAP overpayment, as well as the responsible party(ies) for the overpayments.

For instances where overpayments occur due to system error or other assignment errors the benefit will be recouped by AZDES for that case if readily available. If the benefit has been spent, the case may be referred to the AZDES Office of Accounts Receivable and Collections. P-EBT benefits will not be reclaimed by reducing the household's SNAP benefits.

ADE 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 AZDES will be unduplicated students that have been determined eligible for the P-EBT benefit by ADE. The AZDES ensures that only one qualifying child flagged and NSLP are eligible. We also will link the student id to the benefit record, the case and student file so we are able to determine 1 to 1 payments. In determining the benefit amount for each child, the AZDES and ADE will use the methodology as outlined in the benefit section. The AZDES will have logic performed on the ADE student data file before and during issuance to prevent duplicate payments; this is accomplished by utilizing the students ID number, and first and last name. A test issuance run will be performed and quality checks reviewed before issuance is authorized for a production run. After issuance verification checks will be performed using the Student ID and available case information to check for overpayments or duplicate payments.

AZDES will generate a monthly report with potential overissuances if an over issuance situation is identified during issuance review, any tips from the hotline or other sources. Any repayment arrangements will not reduce SNAP benefits.

Once an overpayment has been identified AZDES will send a P-EBT overpayment notice to the impacted families.

AZDES and ADE by taking an approach of issuance after the fact, automatic issuance with quality checking and not trying to prospectively issue, hope to avoid over issuance in most cases.

**Underpayments:** Starting in July 2021, AZDES will begin to accept underpayment claims from parents and guardians to research and resolve for children not paid or partially paid for a given month during the program. Claims will be either for full payment or partial payment for a given month. Monthly benefits levels are set at the state level as Full Benefit/Partial Benefit or No Benefit(see benefit table in benefit section). AZDES will then verify with

ADE to the local school to confirm or deny the claim. Children must be on the ADE student file for this process or will be referred to the local school to turn in a NSLP free and reduced lunch application. If the school learning plan for the month(s) and subsequent access flag in question supports the claim, AZDES will issue the difference in subsequent issuance cycles until the program ends on September 30, 2021.

#### **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.

AZDES agrees to reporting 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:**

  
Signature  
Print Name and Title ASSISTANT DIRECTOR, DBME/DES

  
Signature  
Print Name and Title Melissa Conner  
Associate Superintendent  
Health and Nutrition Division

Date of Request: 2-24-2024