

**Rhode Island State Plan for Pandemic EBT:
Children in School
School Year 2020-2021**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School, School Year 2020-2021
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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Additional context and background for this document can be found at:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

State Plan for Pandemic EBT: Children in School
School Year 2020-2021

1. **State:** Rhode Island
2. **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act
3. **Executive Summary:**

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

- a. The *date range* covered by this State plan or amendment.
- 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
- 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
- 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

Response:

Rhode Island will build off its previously approved P-EBT plan for August and September 2020. The date range for the current plan will be from October 1, 2020 through September 30, 2021. The state commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan.

The estimates of P-EBT issuance during the date range coverage period are as follows:

- Monthly issuances of \$3,151,777.56
 - Estimated monthly amount issued to school children in SNAP households is \$1,680,941
 - Estimated monthly amount issued to school children in non-SNAP households is \$1,470,836.56
- Total issuance of \$28,365,998 (monthly estimate multiplied by the nine months remaining in the 2020-2021 school year)
 - Estimated total amount issued to school children in SNAP households is \$15,128,469
 - Estimated total amount issued to school children in non-SNAP households is

\$13,237,529

The estimated total number of children to which the State will issue P-EBT benefits is approximately 37,296 .

- Estimated number of school children in SNAP households is 19,845
- Estimated number of school children in non-SNAP households is 17,451

At this time, Rhode Island is not requesting administrative funds. If funds will be requested in future months, an amendment to this plan will be submitted.

¹ The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

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

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

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

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

- Describe how the State will identify eligible school children and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s 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.).
- 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: [please use as much space as needed]

Rhode Island will identify children who are eligible for free or reduced-price meals for the school year 2020-2021 by leveraging its existing data share agreement with the RI Department of Education (RIDE). A very small number of RI schools continue to offer meals under the NSLP and are, by regulation, required to solicit new eligibility applications. All other school districts are operating under the SFSP and, therefore, are not actively soliciting new meal benefit applications. However,

these schools are accepting new applications from families on which new determinations are being made. For these schools, eligibility from 2019-20 is carrying forward unless a new application and determination is made. RI continues to conduct Direct Certification on a monthly basis and continues to directly certify children who are newly eligible this year.

RIDE will collect monthly attendance data from each school district in Rhode Island, including private and charter schools, that contains the demographic information for each student eligible for free or reduced priced meals. The file will include the number of days that child is entitled to P-EBT based on the student's learning mode (fully virtual or hybrid). Rhode Island plans to leverage simplifying assumptions to issue a standard benefit amount to all students in a hybrid learning scenario. Students attending school on a fully remote schedule will receive benefits for each day that they have been learning virtually for a period of 5 consecutive days. This threshold will only be required to be met one time. Once the minimum threshold has been met, students will be eligible to receive benefits for any day where the school is closed or operating with reduced hours and/or attendance.

The first issuance will be for both October and November and will occur on or around December 28 for SNAP participants and December 29 for non-SNAP participants. For the benefit months of December forward, RIDE will share this file at the end of the first week of each month with the previous month's attendance data. Benefits will be provided retroactively to ensure that full and accurate data regarding a student's learning status from the prior month is captured before issuing benefits. RIDE will request that the school districts provide any updates to a child's learning mode prior to the file being sent to DHS. RI DHS's eligibility processor will match the file with current SNAP participants within the State's eligibility system to determine which students are in SNAP households versus non-SNAP.

Demographic information regarding this group will be sent via a file transfer to the EBT processor per the normal process but separate from the regular monthly issuance. For SNAP participants, the P-EBT benefit will be added to the household's current EBT card. For non-SNAP households that have previously received P-EBT benefits, benefits will be added to the household's existing P-EBT card. For non-SNAP households that are newly eligible for free or reduced priced school meals, a new P-EBT card will be mailed to the household.

The school related attendance data provided by RIDE will be the primary mechanism for confirming eligibility for P-EBT benefits/school meal eligibility. Using up-to-date attendance data from the school districts and the private schools will ensure that benefits will not be issued to school year 2019-2020 graduates and other non-students.

RI DHS will be responsible for confirming eligibility when individual case questions arise. However, RI DHS will seek the assistance of United Way 2-1-1 to field telephone inquiries related to P-EBT and collect data to share with DHS staff.

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: [please use as much space as needed]

Since the demographic file will come directly from the school districts to RIDE and then to RI DHS on a monthly basis, and benefits will be issued retroactively, RI DHS will be better able to track any changes in school operating status, duration of closure, reduced hours or reduced attendance. The file provided by the schools will capture information relating to the required 5 consecutive days of reduced hours or attendance.

For hybrid scenarios, where a school is experiencing reduced attendance or hours, all qualifying students will receive a standard monthly benefit based on 11 days of P-EBT eligibility each month. School districts will be required to report to RIDE any significant changes and RIDE will share this information with RI DHS. Collecting this data on a monthly basis and issuing benefits retroactively for the previous month will mitigate the need for school districts to report changes on a frequent basis. However, districts will be asked to report any significant changes for the previous month to RIDE before the issuance file is sent to RI DHS.

The use of simplifying assumptions to create a standard hybrid benefit amount equaling \$64.46 per month is based on the average amount of time a hybrid learning student is virtually learning across the state. Approximately ninety-nine percent of the students from all the districts and charter schools across the state that are in a hybrid instructional model are virtually learning for 3 days each week. Any student who must be absent due to COVID will have to quarantine for 10 – 14 days. Calculating the hybrid amount to equal 11 days allows school districts operating in a fully in-person model to categorize any student’s absence due to COVID as “hybrid” for that month. Based on information provided by the school districts to RIDE, RIDE will reassess the learning model each school is utilizing at least every two months. Using this information, RI will account for potential new hybrid learning models and assess impact on the statewide average benefit amount. For example, if RI finds that there is a significant disparity among hybrid models from one school or district as compared to other schools/districts, RI will assess whether an additional standard hybrid benefit amount is needed to ensure that these differing hybrid schedules are accounted for. RI will then work with FNS to adjust the benefit amount, as needed.

5. Benefit Levels

Standard for Benefit Levels

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

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs		
	Lunch	Breakfast	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
2. Breakfast rates are those received by "severe need" schools.

Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

Students will be issued benefits equal to the federal reimbursement rate for a breakfast and a lunch for school year 2020-2021, as specified by USDA. The benefit is multiplied by the number of school days that the eligible child did not receive a free or reduced-price meal at the school due to the school’s closure or reduced attendance or hours. In Rhode Island the daily per-child benefit is \$5.86.

To determine benefit amount for schools with reduced attendance or hours, the state will use simplifying assumptions to determine the student’s monthly benefit amount. At the end of the first week of each month, RIDE will share a list of students from the previous month in schools with hybrid learning and a list of individual students doing fully virtual learning. Those who are in the hybrid scenario will receive a standard amount equal to the daily per-child benefit times 11 days. This simplifying assumption will be used in order to ensure that all students attending schools with reduced attendance and hours receive a P-EBT benefit without having to collect data on a granular level (collecting every individual student’s specific attendance data each month). The assumption of 11 days of virtual learning each month for hybrid learners is based on the average amount of time a hybrid learning student is virtually learning across the state (see previous section for more detail). Any student who must be absent due to COVID will have to quarantine for approximately 10 – 14

days. Calculating a standard hybrid amount to equal 11 days allows school districts operating in a fully in-person model to categorize any student's absent due to COVID as "hybrid" for that month.

RIDE will share student information for those that are virtual learning full-time (5 consecutive days per week). These students will receive the full benefit amount to which they are entitled based on the number of days in each month in which school is open (excluding holidays and vacations).

6. Implementation Timeline, EBT Processing, and Benefit Issuance

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

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

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: [please use as much space as needed]

Timeline:

Day(s)	Activities
0	USDA approves the State's plan
1	RIDE provides student data for October and November to RI DHS
2	Public notice campaign begins, P-EBT hotline/United Way 2-1-1 becomes active
4 - 6	Dry run for match files, Notices issued to SNAP and non-SNAP households
7	State review of match results and executive approval
8	Production run for RIDE match process and issuance to SNAP individuals
9	Case maintenance file sent to EBT processor to set up cases in their system, retrieve EBT card details for non-SNAP individuals from EBT processor, non-SNAP print file received, printing and mailing (if necessary) of P-EBT cards to non-SNAP families
14 - onward	Issuance to newly identified cases

Distribution of Benefits:

Benefits may be distributed on a SNAP EBT card or a unique P-EBT card depending on whether the child is part of a SNAP household. In most instances, children who receive SNAP benefits will have their P-EBT benefit issued on their SNAP EBT card.

If a child received their P-EBT benefit on their EBT card in the Spring, and their household no longer receives SNAP, their P-EBT benefits for the 2020 – 2021 school year will be issued on their EBT card from the Spring/Fall.

In most instances, children who do not receive SNAP benefits will have their P-EBT benefit issued on a P-EBT card.

If a child received their P-EBT benefit on a P-EBT card in the Spring, and their household now receives SNAP, their P-EBT benefits this fall will be issued on their P-EBT card from the Spring/Fall.

EBT Benefit Type:

Existing EBT benefit types will be used for both SNAP and non-SNAP households. These benefit types are FS01 and FS02. Although they are existing benefit types, they are not currently active/used for any other purpose. These are the same benefit types utilized for the previously approved P-EBT issuances.

Benefit Spend Priority:

For current SNAP households, P-EBT benefits will have the first spend priority.

Expungements:

Expungements for both SNAP and non-SNAP households will occur according to the normal SNAP expungement rules.

Returned Mail:

P-EBT cards that are returned in the mail will be handed as follows:

1. The EBT processor/FIS sends DHS the usual daily card status report with the card numbers for the returned cards marked as “undeliverable”
2. DHS EBT Coordinator creates a “returned mail” ticket in JIRA
3. Deloitte researches the eligibility system to determine if another address exists
4. If an alternate address is available, the EBT Coordinator cancels the card, generates a new EBT card number, updates the information in the JIRA ticket. Deloitte will generate a new print file with updated details and send to FIS to print and mail to the new address. If no alternate address is available, no further action is taken.

Replacement Cards:

RI anticipates that many households will require replacement P-EBT cards as some time has passed since the last card issuance. RI will maintain the process that was in place during previous P-EBT cycles for replacement card issuances. Cardholders are mailed a notice prior to their P-EBT eligibility that instructs them to call the ebtEdge phone number (1-888-979-9939) to request a replacement card. The RI DHS call center IVR also directs cardholders to this line if they are seeking a replacement card, and the United Way 211 line will direct individuals to this line as well. The IVR will then instruct the individual to follow the prompts to request a replacement card. As per the current process:

1. The EBT processor cancels the card
2. RI DHS and the eligibility system vendor is alerted about the replacement request and manually reprints the file for the EBT processor
3. The file is sent back to the processor and the processor will print and mail a new card.

7. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

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

- 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 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: [please use as much space as needed]

Issuance errors:

Individuals can reach out directly to the DHS call center or the United Way 2-1-1 line in order to dispute their benefit amount or eligibility for P-EBT benefits. These disputes will be tracked on a tracking sheet and will be provided to DHS field staff or the EBT Coordinator for investigation. The household may be asked to provide additional verification if DHS is unable to determine if there was an issuance error (for example, documentation of learning status from the student's school, verification of address of the student). Once any necessary documentation is provided and reviewed, DHS will reach out to the household to inform them of its final determination.

If it is found that the individual did not receive a benefit that he/she was entitled to, a JIRA ticket will be created to provide the corrected issuance to the individual. If, after investigation, it is determined that the original benefit amount or denial of benefits was valid, the individual will be informed of his/her right to appeal the Department's decision.

Access Issues:

Since we are determining P-EBT eligibility via an automated data match process rather than via an application process, we do not anticipate a significant amount of access issues. Homeless individuals may need to reach out and identify a safe address for receiving their card if they do not already have one. The EBT processor's IVR prompts these individuals to provide an updated safe address. We do

not use social security numbers as part of our match process with RIDE, nor will they be required for any purpose related to P-EBT. Those with limited English proficiency will be able to speak to DHS or United Way 211 representatives via an interpreter, and mailings will be provided in both Spanish and Portuguese. Households are not required to have internet access to receive these benefits as an application is not required. Individuals with disabilities will be served in the same manner in which we currently serve SNAP participants that require additional assistance.

Public Information Campaign

The State will conduct a public information campaign to alert those receiving benefits of the purpose of P-EBT and how it is to be used. This will include posting on the RI DHS web site, social media, press releases, possible announcement during the Governor's press conference, and notification to community partners.

Information to P-EBT participants

Both SNAP and Non-SNAP participants will receive a mailing with the following information

- A description of P-EBT
- Instructions for PINing the P-EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., only to purchase food 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 and the DHS website with frequently asked questions
- Phone number for the EBT processor for replacement card requests

8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-

EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Response: [please use as much space as needed]

Any potential benefit over-issuance that RI DHS learns of will be tracked on spreadsheet for investigation and resolution. The EBT Coordinator will investigate the over-issuance by checking the RIDE file, checking the information in the eligibility system and requesting additional documentation from the household if necessary. If, after investigation, it is determined that there was an over-issuance (for example, benefits were issued to the wrong household or benefits were issued to a household that was not entitled to them), a JIRA ticket will be created to provide the corrected issuance to the eligible household. A JIRA ticket will also be created to ensure that no additional benefits are issued to the ineligible household for future months. In no instances will RIDHS reclaim P-EBT benefits by reducing a household's SNAP benefit.

9. Benefit Issuance Reporting

Rhode Island agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

10. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

11. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

12. Civil Rights Statement

Rhode Island will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

13. Administration of State P-EBT Plan

Rhode Island will administer P-EBT according to the terms of its approved State plan. If Rhode Island 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
Bethany Caputo, RI DHS SNAP Administrator



Signature
William Trimble, Associate Director of Finance, RI Department of Education

Date of Request: 12/14/2020