

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

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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

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

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

1. **State:** Washington State

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

3. **Executive Summary:**

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

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

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

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

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

Response:

Washington state, the State Agency (SA), proposes to build off its previously approved P-EBT plan for March to June 2020. The date range for the current plan for children in school will be from the beginning of the 2020-2021 school year, August 1, 2020 through September 30, 2021. The SA will provide an amended state plan to include children in child care when able. 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.

- Estimated issuance of P-EBT benefits for 500 cases that were covered under the SY 2019-2020 approved plan, but did not receive benefits due to State error is \$199,500.
- Estimated monthly and total **amount** of P-EBT benefits the State will issue within this plan/amendment's date range is \$590,495,782.40.
 - Estimated amount issued to school children in SNAP households is \$243,570,701.18.
 - Estimated amount issued to school children in non-SNAP households is \$346,925,081.22.
- Estimated total **number** of children to which the State will issue P-EBT benefits is 500,000.
 - Estimated number of school children in SNAP households is 250,500.
 - Estimated number of school children in non-SNAP households is 249,500.
- Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment is \$14,709,463.00.
- The SA's tentative P-EBT issuance schedule will be for all P-EBT eligible children at school (both SNAP and non-SNAP households).
- The SA intends to issue P-EBT benefits retroactively every two months by the 20th of the following month for all eligible households once school districts validate their current school status during that time.

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

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

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

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.
- 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).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response:

The State Agency (SA) will work in collaboration with different entities to determine eligibility of the P-EBT program for school year (SY) 2020-2021. Responsibilities

identified include the Department of Social and Health Services (DSHS) development of policy for the P-EBT program and working with:

- Accenture, a third-party contractor, to:
 - Consolidate student eligibility data,
 - Determine eligibility and benefit levels of students,
 - Handle the customer service call center, and
 - Work with the state's contracted EBT vendor (FIS) to provide a specialized P-EBT card, referred to as a "white card."
- Office of Superintendent of Public Instruction (OSPI) Child Nutrition Services (CNS) in collaboration with each school district to:
 - Provide data for students eligible to receive free and reduced price meals through the direct certification process,
 - Provide data for students eligible to receive free and reduced price meals through the National School Lunch Program (NSLP) application process, and
 - Monitor and collect school educational models.

To identify eligible school children and confirm eligibility, OSPI will work with NSLP school sponsors in Washington state to acquire school data from public schools/districts, private schools, charter schools and tribal compact schools. OSPI CNS will provide requirements, instructions and training to schools on compiling and transmitting data into a central database established by Accenture.

A uniform process will be used to determine Free/Reduced Price Meal eligibility for all students (SNAP recipients and non-SNAP recipients). All NSLP sponsors will be required to submit and maintain updates to data on student free and reduced price meal eligibility, which will include:

- Directly certified students through Direct Certification (DC) system and data from other Direct Certification sources
- Eligible students via new free and reduced price meals application
- Students who have retained eligibility from SY 2019-2020 (students carried over from the previous school year and not captured in the other categories)
- All students enrolled at Community Eligibility Provision (CEP) or Provision 2 schools

Additionally, per Question #14 in the USDA P-EBT Q&A guidance issued on January 29, 2021, OSPI will direct districts to assign eligibility for all free or reduced-price meals eligible students back to the beginning of the 20-21 School Year. Most districts in WA have offered meal service with good participation since September. This indicates a need for meal/food assistance, even though families may have not submitted a meal application early in the school year.

Student access to school meals will be compiled by NSLP sponsors, and include school status (i.e. remote, hybrid or fully in-person) and student access to a meal associated with an instructional day as indicated in the following section, [*4.B. School Status*](#).

Schools will be instructed to only include students enrolled in a school participating in the NSLP or those with access to NSLP meals during a regular SY 2020-2021.

The SA plans to issue P-EBT retroactively in two month increments after initial retroactive eligibility to the beginning of the school year to January 2021. Sponsors will submit data prior to the SA's determined date of issuance. For example, the schools will report data by the 10th of the third month in order to ensure a file can be sent to the EBT vendor, to issue benefits by the 20th. This is explained further in section [7. Implementation Timeline, EBT Processing, and Benefit Issuance](#).

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:

The SA will require school districts to identify and indicate student access to meals associated with an instructional day as indicated in section [4.A. Eligible Children](#). School districts will receive training and guidance from OSPI on how to classify the school status (i.e. remote, hybrid or fully in-person). School districts will submit data to

Accenture through a secure data portal which will reflect the school status for the retroactive time period, transmitted every two months.

When developing our plan, Washington utilized simplifying assumptions and benefit levels to maximize benefits to students while minimizing administrative burden to schools.

There are no federal or state requirement for schools to track or report individual student learning models (remote vs hybrid vs in-person). Additionally, school nutrition departments and school meal IT systems do not capture student learning models or attendance. Therefore we are proposing school level data be utilized to determine benefit levels.

School status and eligible benefit days at each school will be based on the following:

- The school status/eligible benefit days assigned will be based on the meal service available to $\geq 51\%$ of the students enrolled at that school.
- The school status/eligible benefit days will be the meal service available during $\geq 51\%$ of the operating days in the month being reported.

The “majority” ($\geq 51\%$) model represents what is feasibly available or calculable by school nutrition departments. Many schools in Washington are using a “rolling return” approach to bring student back on to campus. For example K- first grade students may come back on campus (in a hybrid model) one month, the next month second graders may be added, and the following month third graders. The majority model is the simplest and quickest way for schools to assess the learning model available and report data for P-EBT benefits.

While using the more broad simplifying assumptions above, we wanted to implement a strategy that would give students the highest benefit level possible. The SA plans to assign a benefit level based on the following defined school status:

- Benefit level 5: Students receive no meal service on campus as part of an instructional day.
- Benefit level 4: Students receive one day of on campus meal service as part of an instructional day.
- Benefit level 3: Students receive two days of on campus meal service as part of an instructional day.
- Benefit level 2: Students receive three days of on campus meal service as part of an instructional day.
- Benefit level 1: Students receive four days of on campus meal service as part of an instructional day.

WA initiated a P-EBT focus group with Food Service Directors of varying size districts to help us understand the potential challenges to implementing P-EBT 2.0. These director shared the many challenges they are facing; staff lay off due to budget shortfalls, months of putting themselves and staff at risk and enduring the elements to serve meals, supply chain issues and USDA cancelation of USDA food shipments, and the upcoming challenge of providing meals both to remote and in-person students.

District directors shared their concern about their capacity to support a “Reconsideration” process. They cited a lack of staff, and no central repository of information for food service staff to access and validate cases. For this reason, Washington is choosing to not include a Reconsideration process in our P-EBT plan.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

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

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

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

Response:

The department will provide an amendment for children in child care when we are able to provide the information needed.

6. Benefit Levels

Standard for Benefit Levels

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

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

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

Response:

The SA will use the school status indicated in section [4.B. School Status](#) to determine benefit levels using these simplified assumptions. The SA believes that the various benefit levels will ensure best options based on school data as we do not have student attendance data.

Benefits will be figured for a one month time period in a school district as indicated in section [4.B. School Status](#). OSPI will provide the number of operating days per month using a state average.

This state average of operating days will then be applied to the school status in the following manner:

Benefit Level	Average School Status	Calculation
5	No Meal Service on Campus	\$6.82 x school operating days x 100%
4	One Day Meal Service on Campus	\$6.82 x school operating days x 80%
3	Two Day Meal Service on Campus	\$6.82 x school operating days x 60%
2	Three Day Meal Service on Campus	\$6.82 x school operating days x 40%
1	Four Day Meal Service on Campus	\$6.82 x school operating days x 20%

To account for the evolving nature of the pandemic and potential changes to school status each month, the state will be issuing benefits retroactively every two months using the school status eligible benefit days experienced by the majority of students and the majority of the month.

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:

The SA plans to contract with a third party, Accenture, to determine P-EBT issuances based on the data supplied by schools. Washington’s goal is to provide P-EBT to eligible children initial issuance of P-EBT from the beginning of the school year to January 2021 in March 2021, depending on the FNS approval of the plan.

The tentative approach is as follows.

- Day 1: FNS approval of P-EBT. Initiate a DSHS and OSPI public awareness campaign begins.
- Day 7: OPSI provides school list to Accenture for database list
- Day 11: Accenture provide portal access to schools
- Day 16: School districts begin uploading data for September 2020 to February 2021.
- Day 20: P-EBT Call Center goes live.
- Day 23: Accenture prepares data transfer for P-EBT eligibility.
- Day 35: Accenture eligibility file transfers to EBT processor FIS. OSPI and DSHS, televised, flyers, social media, etc.
- Day 40: Benefits available on card, FIS sends new P-EBT cards.

The SA will provide an initial retroactive payment to eligible children from the beginning of the school year to January 2021. Issuances will not be staggered, however, card mailing will be limited to a daily capacity of the EBT vendor – FIS - to ship cards, therefore creating a similar effect of staggering issuances. Ongoing eligibility will be based on a two month retroactive look back for ongoing assistance each month until September 2021. To ensure correct information and integrity of the changes in school information, we are allowing schools 10 days to finalize their data for the previous two months and then providing the benefits no later than the 20th of each month through FIS – the EBT vendor.

The SA plans to provide a unique P-EBT card to eligible children via the FIS vendor, referred to as a “white card.” FIS will send this unique card to all P-EBT

eligible children (SNAP and non-SNAP). The SA will ensure clear information is provided to SNAP and non-SNAP households regarding this new, unique card and clear information on who to contact to pin the card, replace the card, or any other questions. Additionally, since there are no other benefits on the white card, there is no need for the SA to establish a draw/spend priority for the P-EBT benefit.

The SA will distinguish P-EBT from SNAP and D-SNAP issuances by using a unique benefit type of “PEBT” for the tracking of the funds for SY 2020-2021. The benefit type will allow the department to filter P-EBT transaction information for reporting purposes.

The SA will use the SNAP expungement timeline of 274 days for P-EBT benefits, which will be included in eligibility notices to households. To limit the number of EBT cards that maybe returned via mail due to incorrect address, OSPI has provided schools with guidance in regards to entering information to the database, which includes the importance of updating household address information, see section [8. Customer Service](#).

Information will be provided to households on how they can replace their card by contacting FIS directly to get a new card mailed.

8. Customer Service

Recommended Standard for Household Support

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

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

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

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response:

The SA will contract with Accenture to provide customer service to assist and support families for the program by providing a call center number. Assistance will be provided to all households regardless of primary language, lack of permanent address or access to technology through assistance over the phone and on-line. The vendor will be the primary contact for benefit amount, concerns about eligibility or benefit levels. Accenture will work in collaboration with DSHS and OSPI. When cases arise regarding P-EBT ineligibility or disagreement with the benefit level, the case will be elevated to OSPI or DSHS for review. In regards to incorrect issuance, the vendor will forward those identified cases as appropriate to the SA in the section [9. Over-issuance of P-EBT benefits.](#)

The SA is committed to equitable access to all eligibility families regardless of circumstance. DSHS and OSPI will work together to address access issues while implementing some options to get households access to the benefit and an EBT card.

OSPI will provide instructions to schools on how to assist students with access issues (i.e. homelessness, disabilities). This will include the option to put a process in place for P-EBT cards for homeless students to be mailed to the school district. This process must include internal controls to ensure safeguard of cards and systems for card accountability. School districts wishing to implement this process will need to submit a plan to OSPI for approval.

The SA will collectively design and launch a communications campaign with the collaboration of OSPI and school districts. This communications campaign will include direct communication with the public and the development of communications tool-kit for schools and community organizations. Information provided includes, but is not limited to, who is eligible, ensuring families provide current address, the benefit amounts and contact information for questions or concerns.

Public awareness campaign includes information provided via:

- Press Release
- Social Media
- Web-pages
- Partner state agencies (i.e. Department of Health (DOH), Department of Children, Youth, and Family (DCYF))
- Partner non-profits and hunger advocacy groups
- Working with Retailer Association

Direct communication with P-EBT eligible households will be done in the form of a notice from Accenture. Notices of eligibility will be mailed out as part of the initial eligibility. We will send out new eligibility notices every two months to address changes in benefits due to changes in school status throughout the year. The SA will work with the contractor to ensure the notice includes:

- 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; and
- Information regarding contacting Accenture’s call center if they have questions, need assistance.

Households with students determined eligible for P-EBT will be sent a specialized P-EBT card, referred to as a “white card,” with the eligible child’s name on it. The card and accompanying information will be mailed to the address on file at the school where the student is enrolled. Information accompanying the “white card” will include details on how to use the card, establishing a pin, replacing the card, and contacting FIS for any issues.

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:

Following current CFR for SNAP eligibility, the SA will not pursue claims against minors as the "white cards" are issued to the eligible child(ren). The SA will mitigate over issuance by retroactively issuing benefits. Cases found eligible will be corrected and cases found ineligible will be acted on to not issue ongoing P-EBT. After further review of the case, if the case is found ineligible, the SA will provide a notice of ineligibility in cases and the reason for ineligibility.

10. Benefit Issuance Reporting

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

11. Administrative Funding

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

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

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

12. Release of Information

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

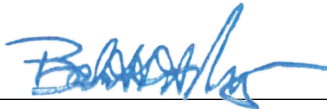
13. Civil Rights Statement

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

14. Administration of State P-EBT Plan

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

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



Signature
Babette Roberts, Director SNAP State Agency



Signature
Leanne Eko, Director Child Nutrition State Agency

Date of Request: 02/12/2021

