

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
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Summary:	(1) This document is a template to assist states in the development of an approved state plan to operate Pandemic EBT for school children and for children in child care during summer 2023. (2) This document relates to Section 1101 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), the Consolidated Appropriations Act, 2021 (P.L. 116-260), the American Rescue Plan Act, 2021 (P.L. 117-2), and the Consolidated Appropriations Act, 2023 (P.L. 117-328)

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

The submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

**State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2023¹**

*Please note that due to the FY 2023 Consolidated Appropriations Act, states can submit a P-EBT Plan for Summer 2023 **without** a School Year 2022-2023 P-EBT Plan for School Children or Children in Child Care.*

1. State: Wisconsin

2. Primary Citation: Families First Coronavirus Response Act (FFCRA), as amended.

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 summer period covered by this initial plan (or subsequent amendment).

- a. Estimated total amount of P-EBT benefits the state will issue within this amendment’s date range. (Consult the appropriate table in Section 4, “Benefit Levels.”)
 - Estimated amount issued to school children
 - Estimated amount issued to non-school children in child care²
- b. Estimated total number of children to which the state will issue P-EBT benefits.
 - Estimated number of school children
 - Estimated number of non-school children in child care
- c. Tentative P-EBT issuance schedule (the date(s) on which Summer P-EBT benefits will be issued). Note that if the federal public health emergency (PHE) declaration for COVID-19 ends prior to September 30, 2023, states must issue all P-EBT benefits for summer 2023 by September 30, 2023. USDA will only approve summer 2023 P-EBT plans that commit to issuing all benefits by September 30, 2023 as long as it remains a possibility that the public health emergency will end prior to September 30, 2023.
 - School children
 - Children in child care
 - Please provide tentative issuance dates for the *potential* benefit for children in child care. Note: USDA will release additional guidance before the start of the summer to confirm the availability and finalize the value of the summer 2023 P-EBT benefit for children in child care.

¹ Changes to the Summer P-EBT program contained in the Consolidated Appropriations Act, 2023 are highlighted in yellow throughout this document.

² Conditional on the federal public health emergency declaration for COVID-19 extending into the summer months.

d. Names of state agencies involved in administering this plan.

Response: [please use as much space as needed]

	Estimated Number of Children in the Category	Estimated Total Amount of Summer P-EBT Benefits Issued	Tentative Time of Issuance
School-Age Children	424,528 ³	\$50,943,360 ⁴	Mid-June 2023

State agencies involved in administering this plan:

- Wisconsin Department of Health Services (DHS)
- Wisconsin Department of Public Instruction (DPI)
- Wisconsin Department of Children and Families (DCF)

Wisconsin commits to informing USDA of any significant increase or decrease in these data points during the summer period covered by this initial plan (or subsequent amendment).

Per USDA direction as of the time of this plan’s approval based on the announced end of the federal Public Health Emergency in May 2023, non-school-age children in childcare will not be eligible for Summer P-EBT benefits in 2023.

³ This represents the number of school-age children as of September 2022 who were attending National School Lunch Program (NSLP) participating schools in 2022-2023 and were enrolled to receive free or reduced price meals. This is the most recent complete count that DPI has available as of the time of this plan’s submission.

⁴ 424,528 school-age children x \$120

4. Summer P-EBT for school children:

- Describe how the state will identify school children who attended an NSLP-participating school at the end of school year 2022-2023 who qualified to receive free or reduced price school meals under the NSLP or SBP. This group includes:
 - School children who attended a school that participated in the Community Eligibility Provision or Special Provisions 2 or 3 in school year 2022-2023.
 - Children who were directly certified for free school meals or who were certified by application for free or reduced price school meals during school year 2022-2023, or children who are determined newly eligible for free or reduced-price meals.

States may not issue summer 2023 P-EBT benefits to children who did not attend an NSLP-participating school at the end of the school year immediately preceding the summer (i.e. at the end of SY 22-23).

- Describe how the state will ensure that households with children eligible for free or reduced price school meals will have an opportunity to establish their eligibility by application through the end of SY 22-23 and into the summer of 2023 (*to the extent possible*). USDA understands that states that elect to keep their school meal application process open beyond the end of the school year will set a summer application deadline that allows the states to process these applications and issue benefits by September 30, 2023, should that become necessary as a result of the expiration of the COVID public health emergency.

Response: [please use as much space as needed]

DHS will work with both DPI and DCF to coordinate the sharing of a file from each agency at/near the end of the 2022-2023 school year that contains all children known to be eligible for free or reduced price school meals at that point in time. The file from DPI will contain all children who were enrolled at a National School Lunch Program (NSLP) participating school and who were approved to receive free or reduced price meals as a result of having an FRPL application approved at some point during the 2022-2023 school year or via enrollment at a CEP school. The file from DCF will contain all children who were directly certified to receive free meals as of the end of the 2022-2023 school year.⁵ When these two files are combined and de-duplicated, this will serve as Wisconsin's list of all children in the state who are eligible to receive the full Summer P-EBT benefit amount as part of the mid-June 2023 issuance.

To ensure that all 2022-2023 P-EBT benefits are issued by September 30th, 2023 in accordance with USDA guidance, any child that is not already determined and on file as being FRPL-eligible by the date that the aforementioned files are pulled and shared by DPI and DCF will not be eligible to receive Summer P-EBT benefits in 2023. While families can continue to submit FRPL applications to their schools throughout the summer months in order to be considered for free or reduced price meals in the following school year (as is the existing process), FRPL applications submitted and/or processed after the date that data is pulled for our mid-June Summer P-EBT issuance will not be used to inform Summer P-EBT eligibility determination.⁶ As further justification of this decision, in Wisconsin, DPI has confirmed that staff in the food/nutrition departments at school food authorities (SFAs) are often off for the summer months and, therefore, unable to consistently process incoming FRPL applications. Additionally, once the summer ends, any FRPL applications submitted over the summer months are not required to be processed by school staff and shared with DPI until several weeks after the next school year begins. This means that any children newly enrolled to receive free or reduced price meals would not be confirmed as such until after the September 30th deadline. This timing would prevent DHS from issuing P-EBT benefits to these families by the stated September 30th, 2023 deadline.

As a final note, the new group of children eligible for School P-EBT in 2022-2023 – those who left an in-person NSLP school since the start of the pandemic to begin homeschooling or learning virtually full time – will not be eligible for Summer P-EBT benefits. This echoes guidance received by states from USDA that stipulates that only children who were attending an NSLP-participating school at the end of the 2022-2023 school year may be eligible for Summer P-EBT benefits.

⁵ Deloitte and DHS will filter this DCF file prior to issuance so that Summer P-EBT benefits are only issued to those children who were directly certified to receive free meals *at an NSLP-participating school* during the 2022-2023 school year.

⁶ This represents a change from how Summer P-EBT eligibility was determined during the summer of 2022 in Wisconsin. Last year, families could continue to turn in FRPL applications to their schools throughout the summer months until 9/1/2022 and, if the application was ultimately approved, they would be able to be considered for Summer P-EBT benefits for 2022. Due to the change in USDA guidance and necessity that states plan for all benefits to be disbursed by 9/30/2022, it is no longer feasible for Wisconsin to allow for ongoing FRPL application submission throughout the summer months. To ensure there is sufficient time for families to receive their benefits and for appeals processes to take place, Wisconsin will only have one round of systematic issuance of Summer P-EBT benefits (in mid-June 2023).

5. Summer P-EBT for children in child care:

- Describe how the state will identify children under age 6⁷ who are enrolled in SNAP during the covered summer period.
- Describe how the state will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period.

Response: [please use as much space as needed]

Per USDA direction as of the time of this plan’s approval based on the announced end of the federal Public Health Emergency in May 2023, non-school-age children in childcare will not be eligible for Summer P-EBT benefits in 2023.

6. Benefit Levels

Summer 2023 P-EBT Benefit

Please note that this new benefit from the Consolidated Appropriations Act, 2023 has changed from the level for Summer 2022 P-EBT benefits.

Summer 2023 P-EBT Benefit	
Contiguous U.S.	\$120
Alaska	188
Hawaii, Guam, Virgin Islands, Puerto Rico, American Samoa, Commonwealth of the Northern Mariana Islands	139

(USDA will provide additional guidance at a later date on pro-rated summer child care benefits in the event that the PHE extends into the summer months but ends prior to the end of the summer.)

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for summer 2023 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

⁷ See school year 2022-2023 P-EBT Q&A #29 ([click here](#)) for additional information on children who reach their 6th birthday after the start of school year 2022-2023.

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 past years, 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.
- If the PHE ends on or before September 30, 2023, states must issue all P-EBT benefits by September 30, 2023.
- 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 P-EBT issuances for previous school years. 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.
- 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]

The State's timeline is predicated on extensive systems and communications work being put in place, some happening prior to receiving full approval. For example, the State intends to rely upon existing P-EBT communication platforms (websites, flyers, FAQs, forums, stakeholder calls) as well as continue updating and developing the strategic communication materials shared with SFAs, families, and other partners as part of its 2022-2023 implementation of School P-EBT and Pre-6 P-EBT (video walkthroughs, email templates).

Following approval, the aforementioned communication materials will be shared with SFAs and families across the state. As is already the case, DHS will continue working with our EBT vendor – FIS – consistently throughout the entire implementation process to avoid any bottlenecks after approval. The initiation of our high-level timeline is based on the assumption that the State already has a signed customer agreement with FIS that may only need slight adjustment after FNS approval.

High-Level Tasks to Complete Post-Approval:

- Communications shared with SFAs/school administrators, families, and the public through existing online platforms and outreach partner support
- Training of existing and new P-EBT Support Team staff who will assist with problem resolution processes and continued communications
- Any systems updates are completed to support administrative functions for the program
- Deloitte identifies dataset of non-school-age children who met Pre-6 P-EBT eligibility criteria for 2022-2023
- On an agreed-upon date in early June, DPI and DCF share eligible school-age population files with DHS, Deloitte combination and de-duplication of these files begins
- Deloitte shares final, comprehensive file of all eligible children with FIS in mid-June
- Benefits are issued via FIS in mid-June
- Letters are mailed to all families with at least one child receiving benefits to explain more about the program, the benefit amount, where benefits can be spent, how to get questions answered, etc.

DHS will issue new, generic P-EBT cards to any households that do not already have a QUEST or a P-EBT card. These will resemble the P-EBT-specific cards issued in all prior school years. For households who received P-EBT benefits during the 2022-2023 school year or in a previous school year and are eligible for benefits again this summer, we will not issue new P-EBT cards because these households were informed that P-EBT cards could potentially have longer-term uses and should be retained. For households that may have disposed of their previous P-EBT card, a new card will be issued upon request. To receive a new P-EBT card, the household would need to call QUEST Card Services (contact information will be available on our P-EBT websites, on notices mailed to the household, and via our P-EBT Support Team). In contrast, existing SNAP households will receive benefits directly on their current SNAP P-EBT (QUEST) cards, consistent with the process in all prior school years.

As was done in past years, Wisconsin will use sub-benefit types in order to differentiate SNAP, D-SNAP, and P-EBT benefits for reporting purposes. In terms of spending priority for households which may receive more than one type of benefit, SNAP benefits will be pulled first, D-SNAP benefits (if applicable) will be pulled second, and P-EBT benefits will be pulled third.

As was also the case in prior years, P-EBT benefits will follow the same expungement schedule as SNAP benefits. DHS has also developed and will leverage the ability to send warning notices to households if/when these P-EBT expungement dates approach.

The return mail process will be managed by dedicated staff within the P-EBT Support Team. The State currently has access to a regular undelivered mail report from our EBT processor (FIS) that identifies which pieces of returned mail contained P-EBT cards so that the P-EBT Support Team can proactively facilitate the reissuance of cards. In the event that an updated mailing address is not available in the CARES eligibility system and cards cannot be proactively reissued, the dedicated team will respond to incoming emails and phone calls from these households, research why cards were not received, and reissue when possible. Additionally, the P-EBT Support Team will spot check batches of cards that were mailed to make sure cards were delivered and activated. If cards are found to be undelivered, the problem resolution staff will contact families and resolve address issues.

8. Customer Service

To complete Section 8, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

- 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 and caregivers 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 over the past year, 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]

Note: This section almost exactly mirrors Wisconsin’s approved School P-EBT and Pre-6 P-EBT plans for 2022-2023.

In the 2020-2021 school year, DHS created a large P-EBT Support Team, a specific unit to support case management and problem resolution for all School P-EBT, Pre-6 P-EBT, and Summer P-EBT operations. Throughout 2021-2022, this group continued to support customer service via a hotline, multiple dedicated email inboxes, direct coordination with SFAs, fair hearings, and other day-to-day management of ongoing P-EBT operations. This will continue for Summer P-EBT in 2023. The hotline number remains 1-833-431-2224, the email inbox for the public/families remains PEBTsupport@wi.gov, and the email inbox for schools/SFAs remains SchoolPEBT@wi.gov.

The P-EBT Support Team employs multiple bilingual staff members and also utilizes the same translation services used by the DHS SNAP team, which will help address challenges encountered by families with limited English proficiency. Children living in foster care are known to the State’s eligibility system, so they will be treated in the same manner as children within SNAP households. Children experiencing homelessness are also known to the State’s eligibility system. As such, these children already have case numbers which include mailing addresses (which can include county agencies or shelters). Since these children are already known to our system, benefits will be loaded systematically onto existing SNAP cards. Social Security Numbers (SSNs) are not required as part of P-EBT eligibility. While SSNs may help DHS identify and match a child to a SNAP case more efficiently, the P-EBT Support Team will be empowered to research individual cases should a match not be identified. There will be no impacts to those students who either do not have a SSN or whose parents choose not to provide one in conversations with the P-EBT Support Team. Additionally, as with SNAP recipients in Wisconsin who have disabilities, P-EBT recipients with disabilities can request to have notices read to them or explained in a different way. To continue, parents of children without internet access can call the P-EBT hotline with questions. Internet access is not an eligibility factor for P-EBT, and, as such, Wisconsin will make every effort to provide the same level of service to those without internet access.

In addition to operational staff, DHS also has communications specialists who will continue to be responsible for supporting the public information campaign for this initiative. This will include regular updates to the DHS P-EBT webpages as well as the development and dissemination of other print and non-print materials, including letters, brochures, and other informational bulletins.

DHS also conducts regular (some every other week, some monthly) virtual calls with stakeholders and the public to discuss P-EBT updates, share program information, and answer questions. Webinars or video walkthroughs will also be tweaked from past years or created this year to reflect new guidance/information.

The DHS team (inclusive of the operations and communications staff) will also work directly with DPI to share information about the program directly with SFAs through the DPI administrator's email distribution list and School Nutrition Team bulletins. This email list, disseminated to public and choice schools, advocacy groups, and other stakeholders, boasts a very high open rate. Emails are also published on the DPI website. DPI relationships with advocacy groups can also be leveraged to disseminate information to private schools.

DHS will send one-time notices prior to the mid-June systematic Summer P-EBT issuance to all households for which a mailing address is available. These notices will include several P-EBT program details such as benefit amounts, an explanation of what P-EBT benefits are and how they qualified, and information about the problem resolution process including the hotline phone number and Support Team email address. Additionally, through an insert that accompanies new P-EBT cards, DHS will provide information to new P-EBT households on how to use their card, how to set up the PIN (following the State's standard PIN process for SNAP households), general SNAP purchase rules, opt-out language, and confirmation that the card and benefits are non-transferrable. Information contained on each communication can be found below.

The notices sent to each P-EBT household will contain:

- Description of the P-EBT program, eligibility information, and the benefit amount being issued to each child in the household as well as the months being covered
- Information as to where benefits can be used and what benefits can be spent on as well as a hyperlink to a DHS website that explains such details, including an explanation of violations and penalties
- Details regarding how to contact the P-EBT Support Team via hotline and/or email address
- Information about contacting the P-EBT Support Team in the event of an incorrect or over-issuance of benefits
- Other details as necessary

The inserts that accompany a new P-EBT card will contain:

- Instructions for activating and using the card, including accessing the ebtEDGE app/website and creating a secure PIN
- Text that indicates that P-EBT benefits are non-transferable
- Instructions for destroying the card and/or declining benefits

9. Over-issuance of P-EBT benefits

To complete Section 9, we encourage states to use language from their previously approved SY 22-23 plans, if applicable.

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.

Please describe how your state will manage P-EBT payment errors.

Response: [please use as much space as needed]

Note: This section almost exactly mirrors Wisconsin's approved School P-EBT and Pre-6 P-EBT plans for 2022-2023.

Wisconsin will not reduce SNAP payments to compensate for P-EBT over-issuance. With detailed student-level data being solicited this year, the State is confident in its ability to correctly issue benefits and to reduce the number of over-issuance cases to as few as possible. Additionally, Deloitte will assist in performing an additional data check prior to the one mid-June systematic issuance to confirm that the State is issuing benefits for each child to the most recent, best available parent/guardian/current caregiver, especially as it pertains to children in out-of-home care placements. That said, in instances in which the State becomes aware of incorrect/over-issuances, the State will abide by the following protocol.

In instances in which benefits are incorrectly assigned (such as to a parent/guardian with whom the child does not reside or in too high an amount) and the error is identified before the benefit issuance process is complete, the State will work to stop the benefits prior to their actual issuance to the recipient. The State will then work to correct the error on the back-end and issue instead to the correct parent/guardian/current caregiver and/or in the correct, full amount.

In instances in which benefits are incorrectly assigned but the error is not identified before the benefits are issued and made accessible to the recipient, the State will work to recoup any benefits that were incorrectly issued but have not already been spent when the incorrectly issued amount exceeds \$500 – the threshold approved in Wisconsin’s Cost Effectiveness Plan. When the incorrectly issued amount is less than \$500, the State will not seek recoupment. The State will then work to correct the error and re-issue to the correct parent/guardian/current caregiver and/or in the correct, full amount. However, the State will seek recoupment of P-EBT benefits in any amount if a case of intentional fraud is identified (such as falsified documents being provided to the P-EBT Support Team).

In the mailed notices sent to benefit recipients, messaging will be included to instruct families to contact the P-EBT Support Team in the event of an incorrect or over-issuance.

Overall, the State is issuing benefits based on the “best available information”. Should cases of over-issuance come to our attention and/or if the State becomes aware of changes in this information, we will investigate the matter, adjust our processes accordingly, and complete the over-issuance spreadsheet that USDA provided to states in the prior school year (as was the process utilized in past school years). Specifically, this spreadsheet asks states to document the size of the overpayment, the number of children affected, the reason for the error, and a thorough explanation of the corrective action that the state will take or has taken to prevent a recurrence of the error.

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. 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 10 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 by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

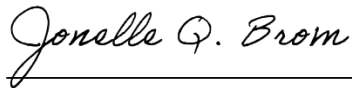
14. Administration of State P-EBT Plan

The state will administer P-EBT according to the terms of its approved state plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the state needs to make any significant changes to its Summer 2023 plan after approval, the state needs to submit an amendment to USDA that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:



Signature

[Jonelle Brom, Director Bureau of Eligibility Operations and Training]



Signature

[Jessica Sharkus, Director School Nutrition Team]

Date of Request: 1/26/2023