

## ANALYSIS

### Item 18: Department of Human Services, Department of Education, Oregon Health Authority Summer EBT Nutrition Program

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**Analyst:** Gregory Jolivet

**Request:** Acknowledge receipt of a report on implementation of the Summer EBT nutrition program.

**Analysis:** In 2023, Congress enacted the new Summer Electronic Benefit Transfer (Summer EBT) program to address the summer nutritional needs of low-income school-aged children. Beginning in June 2024, the program will provide low-income families a \$120 grocery benefit for each eligible child. An estimated 294,000 students in Oregon could be eligible for the benefit. The federal government will pay 50% of program administrative costs and 100% of the benefits costs.

During the 2024 session, the Legislature approved a related multi-agency request for funding and positions to implement Summer EBT and adopted the following budget note instructing the agency to report in May and September on the status of implementation:

The Department of Human Services, in consultation with the Oregon Health Authority and Department of Education, is directed to report to the Emergency Board in May and September 2024 on the status of Summer EBT implementation. The May report shall include, but not be limited to, the following information: (1) a description of the program's eligibility rules and application process; (2) a discussion of the ways in which the agency communicated with potentially eligible children and families about the availability of the new nutrition benefit; and (3) the program's information system stage gate endorsement(s), requirements, implementation costs, and implementation timeline. The September report shall include, but not be limited to, the following: (1) a discussion of the number of children and families who received the benefit in summer 2024; (2) the number of children and families enrolled via automated determinations (or categorically eligible) versus requiring a more involved application and enrollment process; (3) the plan to transition from a vendor system to an ongoing state-based information technology system; and (4) any other lessons learned that may help to improve the program for summer 2025.

On April 29, 2024, the Department of Human Services (DHS), Oregon Department Education (ODE), and Oregon Health Authority (OHA) submitted the first report. As requested, the brief report provides information on program eligibility and application processing, a summary of planned outreach efforts, and an update on major implementation milestones.

Most importantly, the report indicates the state is on track to begin providing qualified Oregonians the nutrition benefit by the planned June 2024 program start date. Oregon's operational advanced planning document was approved by the federal government in April 2024. The underpinning information technology project achieved stage gate 1 approval from the State Chief Information Office, which ensures controls are in place for oversight and quality assurance of the IT system development and implementation. May 15th was established as the target date for having an executed contract with

Deloitte for system development. Deloitte was the only company to respond to the agency request for information, so a direct procurement process is being used. All DHS position recruitments for 2024 were on track to be completed by May 20, 2024.

Regarding potential risks, DHS indicates that state and federal cost sharing could change somewhat depending on whether certain costs are eligible for federal funds. Additionally, with many new federal requirements being built into the payment system, the agency is working to mitigate the possibility of some system errors occurring.

#### Background

Senate Bill 5701 provided \$12.2 million General Fund (\$96.6 million total funds) and 65 positions (21.83 FTE) to implement Summer EBT. As the lead agency for food benefits, DHS received most of the funding. Since the new IT system required to administer Summer EBT will interface with existing systems managed by OHA's Office of Information Services and will require some information sharing with schools, OHA and ODE also received some funding and positions. The funding package includes approximately \$16 million for vendor costs mostly related to IT system development; \$6.5 million for staffing, mostly for positions within DHS to process applications; \$2 million for notices; and \$71 million Federal Funds expenditure limitation to cover benefit costs in 2024 and 2025. The table below shows how the funds were allocated among the three participating agencies.

Senate Bill 5701 - 2023-25 Summer EBT Funding						
Agency	General Fund	Other Funds	Federal Funds	Total Funds	Pos	FTE
Department of Human Services	11,984,958	149,247	82,506,435	94,640,640	55	15.85
Department of Education	169,164	-	169,164	338,328	2	0.94
Oregon Health Authority	-	1,644,492	-	1,644,492	8	5.04
<b>Totals</b>	<b>12,154,122</b>	<b>1,793,739</b>	<b>82,675,599</b>	<b>96,623,460</b>	<b>65</b>	<b>21.83</b>

**Recommendation:** The Legislative Fiscal Office recommends that the Emergency Board acknowledge receipt of the report.

Oregon Department of Human Services, Oregon Department of  
Education, Oregon Health Authority  
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**Request:** Report on the implementation of the Summer Electronic Benefit Transfer (EBT) program by Oregon Department of Human Services, Oregon Department of Education, and Oregon Health Authority.

**Recommendation:** Acknowledge receipt of the report.

**Discussion:** The Consolidated Appropriation Act (2023, PL 117-328) established a permanent Summer EBT program beginning in the summer of 2024. The Summer EBT is a federally funded, state-administered nutrition benefit program. Under the program, the United States Department of Agriculture Food and Nutrition Services (FNS) provides all benefit funding for families to receive \$40 per eligible child, per month, over the summer months to help cover food costs. These benefits are designed to supplement other nutrition assistance programs, such as summer meal sites, Supplemental Nutrition Assistance Program, and Women Infants and Children, to help ensure kids have consistent access to nutritious food when school is out. Summer EBT benefits will come in the form of pre-loaded cards that families can use to purchase groceries. The benefits will be available for an estimated 294,000 Oregon students that are currently eligible for the National School Lunch Program and School Breakfast Program (NSLP/SBP).

States are charged with managing the Summer EBT benefits in a manner consistent with state-funded food and cash assistance programs, including the distribution of benefits in the form of an EBT card. Benefits are 100 percent federally funded and the administration costs of the program are funded 50/50 between state funds and federal funds. With the passage of Senate Bill 5701 (2023), the Legislature appropriated \$12.2 million General Fund for state administration costs along with additional Federal Funds expenditure limitation. Direct benefit costs are anticipated to total \$70.6 million Federal Funds over the course of summer 2024 and summer 2025.

The following budget note was included in Senate Bill 5701 (2023):

**Budget Note:**

*The Department of Human Services, in consultation with the Oregon Health Authority and Department of Education, is directed to report to the Emergency Board in May and September 2024 on the status of Summer EBT implementation. The May report shall include, but not be limited to, the following information: (1) a description of the program's eligibility rules and application process; (2) a discussion of the ways in which the agency communicated with potentially eligible children and families about the availability of the new nutrition benefit; and (3) the program's information system stage gate endorsement(s), requirements, implementation costs, and implementation timeline. The September report shall include, but not be limited to, the following: (1) a discussion of the number of children and families who received the benefit in summer 2024; (2) the number of*

*children and families enrolled via automated determinations (or categorically eligible) versus requiring a more involved application and enrollment process; (3) the plan to transition from a vendor system to an ongoing state-based information technology system; and (4) any other lessons learned that may help to improve the program for summer 2025.*

The report submitted by the Oregon Department of Human Services (ODHS), Oregon Department of Education (ODE), and the Oregon Health Authority (OHA) described the eligibility requirements as directed by the budget note, depicted the application process, which is automatic for the summer of 2024 based upon the receipt of SNAP, TANF, or Oregon Health Plan benefits, documented completed milestones including Enterprise Information Services Stage Gate 1 endorsement from the Department of Administrative Services, as well as federal approval of Oregon's Implementation Advance Planning Document on April 17, 2024, and identified next steps for full implementation including an executed contract with a vendor to support the necessary IT infrastructure for the program.

Significant milestones must still be met for implementation of Summer EBT by the summer of 2024, including information and data sharing agreements between state agencies, federal approval of Oregon's Plan for Operations and Management, the filing of temporary rules, and finalizing the design of the application and benefit delivery system. While significant risks remain, ODHS and ODE have recent experience coordinating a similar benefit program on a short timeline, namely Pandemic-EBT, which was delivered to Oregon families in response to nutritional gaps resulting from COVID-19. This experience combined with demonstrated progress in the May 2024 Summer EBT report, indicates the departments are moving towards successful implementation.



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DEPARTMENT OF  
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Tina Kotek, Governor

April 29, 2024

Senator Rob Wagner, Co-Chair  
Representative Julie Fahey, Co-Chair  
State Emergency Board  
900 Court Street NE  
H-178 State Capitol  
Salem, OR 97301

RE: SB5701 Budget Note for Summer EBT

Dear Co-chairpersons,

**SB5701** was approved in the 2024 Oregon Legislative Session and authorized \$12 million in state funding to support creation and implementation of the new Summer EBT nutrition program for children for 2024 and 2025.

### **Background**

Summer EBT is intended to reduce hunger and food insecurity for children who lose access to free and reduced-price meals through the National School Lunch Program (NSLP) and School Breakfast Program (SBP) during the summer months when school is not in session.

Summer EBT is a grocery benefits program to help families buy food for their school-aged children during the summer. Families will get \$120 for each eligible child. Summer EBT starts in 2024 and will happen every summer. Up to 294,000 children may be eligible to participate.

Summer EBT is a program in partnership with the Oregon Department of Human Services (ODHS) and the Oregon Department of Education (ODE), with ODHS as the lead agency.

The Consolidated Appropriations Act, 2023 (P.L. 117-328) authorized a permanent, nationwide Summer EBT Program with direct requirements that relate under section 13A of the Richard B. Russell National School Lunch Act (NSLA) [42 U.S.C. 1762].

### **SB5701 Authorization**

As part of the national effort to reduce food insecurity among school-aged children, the Legislature approved an increase of \$12 million General Fund (\$94.6 million total funds) and 55 positions (15.85 FTE) for ODHS to implement the new federal nutrition program.

- \$5.8 million General Fund (\$11.7 million total funds) to contract with a vendor for IT system development.
- \$3 million General Fund (\$6.1 million total funds) for ODHS positions
  - Six permanent, full-time positions in the Self-Sufficiency Program to support program design and delivery.
  - 34 limited duration positions and 13 permanent positions in the Oregon Eligibility Partnership program to support application processing.
  - Two permanent, full-time positions in Central Services to handle accounting and contract management-related activities.
- \$2 million General Fund (\$4 million total funds) for EBT vendor costs.
- \$1 million General Fund (\$2.2 million total funds) for notice mailings.
- \$70.6 million Federal Funds expenditure limitation to cover benefit costs in 2024 and 2025.

Additional funds and positions were approved for the Oregon Health Authority (OHA) and ODE to implement Summer EBT as the new information technology

system will need to interface with existing systems managed by OHA's Office of Information Services. It also will require some information sharing with school districts and ODE.

The state's contribution to Summer EBT will bring in \$83 million in federal funding with \$12 million in matching funds for administrative costs and \$71 million in food benefits to be issued to children in Oregon. Every \$1 spent in EBT food benefits generates at least \$1.50 in local economic activity, as stated in the Food Research and Action Center Fiscal Year 2024 Budget Appropriations and Priorities

### **Agency Action**

ODHS is submitting the attached report to fulfill its May 2024 Summer EBT Budget Note requirement as described in SB 5071:

*The Department of Human Services, in consultation with the Oregon Health Authority and Department of Education, is directed to report to the Emergency Board in May and September 2024 on the status of Summer EBT implementation. The May report shall include, but not be limited to, the following information: (1) a description of the program's eligibility rules and application process; (2) a discussion of the ways in which the agency communicated with potentially eligible children and families about the availability of the new nutrition benefit; and (3) the program's information system stage gate endorsement(s), requirements, implementation costs, and implementation timeline. The September report shall include, but not be limited to, the following: (1) a discussion of the number of children and families who received the benefit in summer 2024; (2) the number of children and families enrolled via automated determinations (or categorically eligible) versus requiring a more involved application and enrollment process; (3) the plan to transition from a vendor system to an ongoing state-based information technology system; and (4) any other lessons learned that may help to improve the program for summer 2025.*

## Action Requested

ODHS requests acknowledgement of this report.

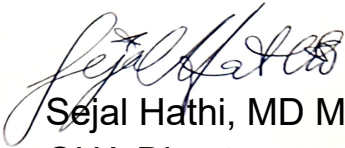
Sincerely,



Fariborz Pakseresht  
ODHS Director



Dr. Charlene Williams  
ODE Director



Sejal Hathi, MD MBA  
OHA Director

EC: Amanda Beitel, Legislative Fiscal Office  
Gregory Jolivet, Legislative Fiscal Office  
Julie Neburka, Legislative Fiscal Office  
Matt Stayner, Legislative Fiscal Office  
Kate Nass, Department of Administrative Services  
Mike Streepey, Department of Administrative Services  
Courtney Rogers, Department of Administrative Services  
Adam Crawford, Department of Administrative Services  
Patrick Heath, Department of Administrative Services





# Budget Note on 2024 Program

May 2024

## Executive Summary

Every child needs reliable access to nutritional food year-round to be healthy and reach their potential. [Oregon Food Bank](#) reports that one in five people in the state face hunger. During the summer months, many children in families with food insecurity do not have easy access to the healthy breakfasts and lunches they get at school during the school year. [Partners for a Hunger-Free Oregon](#) estimates that families must come up with at least 10 more meals a week, per child, during summer break. Summer Electronic Benefits Transfer (Summer EBT) is a new food benefits program to help shrink the hunger gap for school-age children during summer breaks.

The USDA Food and Nutrition Services (FNS) estimates that up to 294,000 children in Oregon will benefit from Summer EBT. Each eligible child will receive \$120 in Summer EBT food benefits each summer. Families will receive the benefits on an Oregon EBT card. Oregon aims to launch the program in June 2024 and is preparing to issue \$35.3 million in Summer EBT food benefits in its first year. Summer EBT will provide vital assistance to families during the break from school, helping them purchase groceries and maintain food security.

Summer EBT was established by the Consolidated Appropriations Act of 2023. It will work in collaboration with other federal food assistance programs offered in Oregon such as free and reduced-price school meals and the Supplemental Nutrition Assistance Program (SNAP). Programs with similarities to Summer EBT have been offered in the past as federal demonstration projects or temporary pandemic benefits. They were successful in reducing food insecurity and improving health.

Approval and matching funds for offering Summer EBT in Oregon were provided during the 2024 Oregon Legislative Session through SB5701. The Oregon Department of Human Services (ODHS), partnering with the Oregon Department of Education (ODE), will implement this program.

SB5701 requires ODHS and ODE to submit an implementation update to the Emergency Board in May and September 2024. This report shall include, but is not limited to, implementation timeline, eligibility, communication plan for eligible recipients, the program's information system stage gate endorsement(s), requirements, implementation costs, and implementation timeline. This report has been submitted to meet this requirement.

## Eligibility

A school-aged child is eligible for Summer EBT if:

- The household already receives SNAP, TANF or the Oregon Health Plan (Medicaid) OR
- The child attends a school with the National School Lunch Program (NSLP) or School Breakfast Program (SBP), and the household income meets the requirements for free or reduced-price school meals OR
- The child attends a school with the NSLP or SBP and is:
  - Enrolled in migrant programs
  - Experiencing houselessness
  - Participating in the Food Distribution Program on Indian Reservations
  - Attending Head Start

Families will get their Summer EBT benefits on an Oregon EBT card.

## Application

If a household receives SNAP, TANF or the Oregon Health Plan (Medicaid) this school year (2023-2024),

the school-aged children will be signed up for the Summer EBT program automatically.

Families that believe their child is eligible for Summer EBT but was not signed up automatically, can apply. They will need to complete a simple application online, by phone or by submitting a paper application. The application will need household income and the child's name, school, date of birth and address. The application period will open in mid-June. The paper application will be offered in several languages and alternative formats, including English, Spanish, Russian, Somali, Arabic, Chinese (Simplified and Traditional), Ukrainian, and Vietnamese.

## Eligibility determination

States must determine eligibility for Summer EBT. For families that must apply, Oregon will offer paper, phone or online options. Reviewing eligibility includes verifying income, individuals, and qualifying school participation through individual attestation compared to program eligibility requirements. State will process applications and verify information that is questionable before authorizing approvals and denials for benefits.

Summer EBT will have Fair Hearing Requests for individuals that do not agree with the Agency decisions. Summer EBT is required to recoup costs if overpayments are made and limit the time dollars can be available on EBT cards.

## Project Status

Oregon organized quickly to position itself to offer Summer EBT the first year the program is available. Oregon aims to implement Summer EBT in June 2024. Many milestones along a short timeline must be met to start the program in June. There are dependencies among those milestones.

### Completed milestones

- **Federal approval of Oregon's Operational Advanced Planning Document:** This document allows Oregon to utilize federal funding for 2024. It was approved by USDA FNS on April 14, 2024.
- **Information System Stage Gate 1 Approval:** ODHS received the first in a series of Stage Gate endorsements from the State Chief Information Office. The Stage Gate 1 endorsement was received on April 10, 2024. This review process is required for Oregon agencies with IT projects more than \$1 million. The purpose of the process is to ensure controls are in place for oversight and quality assurance of IT system implementations. The Stage Gate 1 approval allowed ODHS to initiate the project and move ahead with finalizing a contract with the vendor to design and implement the system for Summer EBT application and benefit issuance.

ODHS also is working with Enterprise Information Services (EIS) in the Department of Administrative Services (DAS) on requirements to procure an independent Quality Management Services (iQMS) vendor. Due to the short timeline for Summer EBT, the vendor will provide limited, additional oversight for Summer EBT implementation in 2024 and will focus on the transition of the system from the vendor to the state in 2025. It also will support selection of a vendor for ongoing maintenance and operations and system stabilization after transfer to the state.

### Upcoming milestones

- **Vendor Contract Finalization:** Negotiations are underway for a vendor to provide implementation support for Summer EBT 2024. This includes building a system that includes data-sharing among agencies, benefit application and issuance, and call center support. The system will include three

portals: For eligibility workers, schools and benefit applicants. The system will be transferred to the state for 2025.

With Deloitte being the only company to respond to the Request for Information, a direct procurement process is being used. The critical path for contract and system work is based on having an executed contract by May 15, 2024. Anything beyond that may limit Oregon's ability to meet its proposed timeline.

- **Information- and Data-Sharing Agreements:** The successful implementation of the Summer EBT program hinges upon the sharing of data among multiple organizations. Efforts to establish the robust data- and information-sharing agreements needed to make the Summer EBT program work in Oregon are steadily progressing.

ODHS must have both a data-sharing agreement and Inter-Agency Agreement with ODE to receive data from ODE and share with Deloitte. The agreements must be in place, as well as the contract with Deloitte, before data can be transferred. These agreements also must be in place for FNS to give Oregon final approve on its Plan for Operations and Maintenance (POM).

The Inter-Agency agreement is being finalized and ensures regulatory alignment. Information exchange between ODHS and Oregon school districts is safeguarded by regulations governing Free and Reduced-price Meals, ensuring compliance and confidentiality.

Existing agreements with Child Welfare and the Oregon Health Authority enable seamless data sharing, facilitating streamlined certification processes and enhancing program efficiency.

- **Federal approval of Oregon's Plan for Operations and Management (POM):** Oregon's POM along with our funding and waiver requests have been submitted to the USDA FNS. Oregon is responding to questions from FNS for the POM to progress through the approvals process. The vendor contract must be finalized and the data-sharing and Inter-Agency Agreement with ODE in place before the POM will be approved.
- **Filing of Temporary Rules:** Temporary rules will be filed by the end of May because the timeline does not allow permanent rules to be created before the program launches in June. These rules will entail defining the program purpose and scope, administration of the program, application process, eligibility and verification requirements, the operational and processing timeframes, benefits issuance and use, liabilities, overpayments, and Fair Hearings Requests.
- **Finalizing design of the application and benefit delivery system:** The draft design is in review and will be prepared for implementation by the end of May. The draft design includes operational and benefit issuance processes, and application design.

## Hiring

Through SB 5701, ODHS was approved to hire 17 permanent position and 38 limited duration positions to create and support the Summer EBT program. Ten additional positions were approved for ODE and OHA. Hiring is in process as described below.

ODHS Self-Sufficiency Programs (SSP) are hiring six positions. All recruitments are on track to conclude by May 20, 2024.

- **Operations & Policy Analyst 3:** Oversees program performance, generates reports for executive leaders, coaches program staff on eligibility and performance tracking. Sets criteria for measuring program effectiveness, provides guidance on implementation, and manages audits and responses to legislative actions. Start date: May 6, 2024.

- Operations & Policy Analyst 2: Functions as the Rules coordinator, serving as the primary liaison for expert technical support to policy staff involved in rule development, ensuring that all rules align with legislative and statutory intent, minimizing risk and ensuring compliance with state and federal regulations. Start date: May 6, 2024.
- Program Analyst 3 Program Implementation Specialist: Collects, organizes, and analyzes data related to our external partners. Monitors program performance, assesses outcomes, and presents detailed reports with recommendations. Start date: May 1, 2024.
- Program Analyst 2 Program Expansion Specialist: Maintains program participation and promotes growth through partnerships with external agencies. Start date: May 20, 2024.
- Research Analyst 2 Research and Development: Focuses on research and development to derive meaningful insights from complex datasets. Designs effective and user-friendly dashboards for leadership and government agencies. Start date: May 20, 2024.
- Research and Analyst 2 Consultation and Analysis: Uses analytical skills to interpret data, communicate complex information to various audiences for program planning. Start date: May 20, 2024.

ODHS Oregon Eligibility Partnership (OEP) is hiring seven positions. All position descriptions have been written and are in classification review. Limited Duration positions will be hired after the 2024 program launches to focus on preparing for the 2025 program.

- 2 Operations and Policy Analyst 1 positions: Responsible for User Acceptance Testing.
- 1 Operations and Policy Analyst 2 and 1 Operations and Policy Analyst 3 position: Serve as business analysts for the Summer EBT system.
- 1 Operations and Policy Analyst 2 position: Provides operations, policy analysis and procedural support.
- 2 Compliance Specialist Positions: One will perform quality assurance and one will manage hearings.

ODE is filling two positions:

- Information Systems Specialist 7: Provides data support and works with ODHS to support processing Summer EBT applications.
- Program Analyst 1: Provides operations and customer service support for school districts for accepting and transferring applications to ODHS.

## Communication

ODHS and ODE have set-up a shared communications workstream that includes representation from both agencies, Deloitte, and hunger-prevention advocates and community partners. The communications approach is designed to ensure as many eligible children as possible receive Summer EBT food benefits by:

- Leveraging successful communications materials and tactics from the Pandemic EBT program issuances

- Adopting an omnichannel strategy with consistent messaging and branding for a customer-focused experience
- Creating a clear and effective outreach and communication strategy to help families understand if they need to apply
- Begin communicating with families early so they understand application and eligibility processes

The communications activities are organized into six packages to be delivered through the end of the year.

- Package 1 (March-April): Initial kick-off, including organizational and planning activities. Building general awareness of Summer EBT.
- Package 2 (May): Prepare school points of contact to support families who apply
- Package 3 (June): Announce the program is live
- Package 4 (July): Conduct ongoing outreach to ensure people apply who are likely eligible but haven't applied
- Package 5 (August-September): Provide updates and remind families the program will close for the year soon.
- Package 6 (October-December): Announce 2024 program closure and that benefit distribution for the year is complete.

Recent activities include: Development of a Summer EBT brand and guidelines; the first version of a public website in English and Spanish; creation of the paper application, eligibility decision and other notices; a social media toolkit, newsletter templates and various internal and partner communications. On March 14, 2024, Oregon hosted a Summer EBT informational webinar for community partners. It was among the first in the nation and drew nearly 400 registrants.

## Budget

SB5071 authorized \$12- million in state funding to support establishing the Summer EBT program in 2024 and for 2025. When combined with federal funding, the total cost for the 2024 and 2024 programs is approximately \$96.6 million. About 85% of the total budget is federally funded.

The state's contribution to Summer EBT will bring in \$83 million in federal funding with \$12 million in matching funds for administrative costs and \$71 million in food benefits to be issued to children in Oregon. Every \$1 spent in EBT food benefits generates at least \$1.50 in local economic activity, as stated in the Food Research and Action Center Fiscal Year 2024 Budget Appropriations and Priorities.

One-time costs of \$11.68 million are 60% federally funded and cover system development.

SB5071 also included ongoing funding for maintenance and operations of the system to support the permanent Summer EBT program. There will be a Request for Proposal (RFP) for the 2025 maintenance and operations contract.

23-25 ODHS	Funding Source			Total
Budget Area	General Funds	Other Funds	Federal Funds	Total Amount
Staffing	\$3,003,858	\$149,247	\$2,965,335	\$6,118,440
System development	\$5,840,000		\$5,840,000	\$11,680,000
Notice Mailing	\$1,120,140		\$1,120,140	\$2,240,280
EBT Vendor (FIS) Admin	\$2,020,960		\$2,020,960	\$4,041,920
EBT Benefits			\$70,560,000	\$70,560,000
<b>Total Cost</b>	<b>\$11,984,958</b>	<b>\$149,247</b>	<b>\$82,506,435</b>	<b>\$94,640,640</b>

23-25 OHA OIS	Funding Source			Total
Budget Area	General Funds	Other Funds	Federal Funds	Total Amount
Staffing	\$0	\$1,644,492	\$0	\$1,644,492
Total Cost	\$0	\$1,644,492	\$0	\$1,644,492
23-25 ODE	Funding Source			Total
Budget Area	General Funds	Other Funds	Federal Funds	Total Amount
Staffing	\$169,164	\$0	\$169,164	\$338,328
Total Cost	\$169,164	\$0	\$169,164	\$338,328
Grand Total	\$12,154,122	\$1,793,739	\$82,675,599	\$96,623,460

**For additional information:**

Contact Roberto Gutierrez  
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