

**Amendment to Approved State Plan for Pandemic EBT  
Children in School and/or Child Care, Summer 2021**

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| <b>Issuing Agency/Office:</b> | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program   |
| <b>Title of Document:</b>     | Amendment to Approved State Plan for Pandemic EBT: Children in School and Child Care, Summer 2021   |
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| <b>Date of Issuance:</b>      | April 26, 2021  |
| <b>Replaces:</b>              | N/A   |
| <b>Summary:</b>               | (1) This document is a template to assist States in the development of an amendment to extend their approved State plan to operate Pandemic EBT for school children and for children in child care during summer 2021. (2) This document relates to Section 1106 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), and the American Rescue Plan Act, 2021 (P.L. 117-2) |
| <b>Disclaimer:</b>            | The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.   |

*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. This emergency information collection (IC) will be replaced by a full IC package to be submitted to OMB for approval prior to its expiration date of 8/31/21. All components of this summer 2021 P-EBT package will be addressed in the full IC package.*

**Amendment to Approved State Plan for Pandemic EBT  
Children in School and/or Child Care, Summer 2021**

1. State: Colorado

2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA) as amended by the American Rescue Plan Act of 2021

3. **Here's what FNS needs from you:**

a. If a State chooses to elect the U.S. standard benefit<sup>1</sup>, simply check the box below. Next, go to letter 'c' (*Estimated total amount of P-EBT benefits*) of the template.



*By checking this box, we are indicating that our State will use the U.S. standard benefit for the covered summer period.*

b. If a State chooses not to elect the U.S. standard benefit, FNS needs the following information:

- The number of days for which benefits will be issued as part of the State's covered summer period; and
- An explanation for how the State arrived at the number of days in the State's covered summer period. USDA will not approve a plan that does not tie the length of its covered summer period to the actual summer 2021 calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.

**Response:** [please use as much space as needed]

N/A

c. 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: **\$133,125,000 (Upper bound)**

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<sup>1</sup> The U.S. standard benefit – as defined in Question #5 of FNS' Q&A document titled, "Summer P-EBT Q&A" – is equal to the median number of weekdays in the sampled school districts multiplied by the daily P-EBT rate. For States in the continental U.S., that works out to a fixed summer benefit of \$375 per eligible child (55 days at \$6.82 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #14 for a complete set of standard benefit amounts.

- Estimated amount issued to non-school children in child care: \$26,250,000
- d. Estimated total number of children to which the State will issue P-EBT benefits.
- Estimated number of school children: 355,000 (Upper bound)
  - Estimated number of non-school children in child care: 70,000
- e. Tentative P-EBT issuance schedule (the dates on which Summer P-EBT benefits will be issued). Note that USDA encourages States to distribute summer benefits in two or even three issuances across the summer, to the extent practical.

Due to the complexity of previously scheduled P-EBT issuances in July for school year and child care eligible children, Colorado is unable to issue Summer P-EBT benefits before September. Below is the proposed issuance schedule for Summer P-EBT benefits.

- Children in child care enrolled in SNAP in May, June and/or July will receive a single P-EBT summer issuance in **late October**.
  - All eligible school age children identified through the May 31 data submission, newly F/RP-eligible school children who are determined eligible for F/RP during the beginning of the covered summer period (through 6/30), and newly F/RP-eligible school children who apply for F/RP meals during the remainder of the covered summer period (through 8/15) will receive a single Summer P-EBT issuance in **late October**. Please note: these three groups are spelled out to correspond to our data collections from April/May, then planned for August and again in September.
  - Children in child care who apply for SNAP during the remainder of the summer coverage period (through 8/15) will receive a single Summer P-EBT issuance by **late October**.
- f. Describe how the State will identify eligible school children and children in child care for summer P-EBT. You must address each of the following bulleted items, below, when responding.

**For school-aged children:**

- Describe how the State will identify school children who received P-EBT benefits during the last month of SY 20-21.

The Colorado Department of Education (CDE) will compare student data from the May 31 P-EBT collection to CDE's existing End-of-Year (EOY) data collection to verify that F/RP eligible students remained enrolled in an NSLP school during the last month of the school year before issuing Summer P-EBT benefits. However, doing so will require delaying the issuance of Summer P-EBT benefits until the end of October 2021, since school districts have until September 9 to submit their EOY data, with final certification not occurring until December 2021. To use EOY data before December, CDE has obtained special permission

from the Commissioner of Education to use preliminary EOY data for P-EBT purposes.

CDE reviewed last year's EOY data collection and determined that while 96% of students were accounted for by the September 9, 2020 EOY deadline, only 135 out of 185 districts (73%) had submitted data by that deadline. The 50 school districts that did not meet last year's EOY deadline were generally very small districts that did not have staff over the summer to prepare data. CDE anticipates a similar gap in timely data submission with this year's EOY data collection. The EOY data collection is also not applicable for private schools, so a separate process would need to be developed to confirm their student enrollment in the last month of the school year.

- Describe how the State will identify school children who were eligible for free or reduced price school meals under the NSLP and SBP in SY 20-21 but did not receive P-EBT benefits in the last month of the school year because they attended school in-person and benefitted from a free or reduced price meal service at school. This includes children who were eligible for F/RP meals during the school year and did not receive P-EBT benefits because the children attended school in-person during the school year.

See the answer above.

- Describe how the State will identify children who are determined newly eligible for free or reduced price school meals during the covered summer period. States must provide an opportunity for families to apply for free or reduced price meals using the normal application process. States and SFAs should consider maintaining a minimum presence to process Free and Reduced Price Meal applications, perhaps on a part-time or weekly basis. Another alternative is for SFAs to accept new Free and Reduced Price Meal applications during the summer but only process them after the start of the new school year. Children determined eligible on applications *submitted prior to the end of the summer* could then be issued P-EBT benefits retroactively after the start of the new school year. (Note that it is preferable to process applications and issue benefits during the summer period that the benefits are intended to cover). Since Colorado's Summer P-EBT plan was not finalized before the end of the school year, schools were unlikely to have been collecting new F/RP meal applications for the 2020-2021 school year after the last day of classes (which typically occurred between the end of May and the middle of June). However, some schools may have *processed* F/RP meal applications that were submitted near the end of the school year after the last day of classes. For example, a student could have submitted a F/RP meal application on Friday, May 28 and the school would not have been required to process that application until Monday, June 14. Similarly, a student attending a district whose last day of school was Friday, June 11 could have turned in a F/RP meal application that day and the school would not be required to process it until June 25. For this reason, CDE is instructing districts to only submit data in the August collection for students who submitted a

F/RP application by the last day of classes and had those applications *processed* by June 30, 2021.

**For children in child care:**

- Describe how the State will identify SNAP-enrolled children who received P-EBT child care benefits in the last month of the school year.

The Colorado Department of Human Services (CDHS) will identify all children under 6 (as of October 1, 2020) through its SNAP eligibility system known as Colorado Benefit Management System (CBMS). CDHS will pull each child's SNAP activity for June, July, and/or August to determine eligibility for Summer P-EBT benefits. SNAP participation any time during the covered summer period (June 1 - August 15) will qualify the child for Summer P-EBT.

- Describe how the State will identify SNAP-enrolled children who would have received P-EBT child care benefits in the last month of the school year, but did not receive benefits because their child care facility was not closed or operating at reduced attendance or hours in that month, and neither their child care facility nor the child's residence was in the area of a school that was closed or operating at reduced attendance or hours in that month.

See above. CDHS will be able to identify all children under 6 enrolled in SNAP as of June 2021, regardless of whether they previously received a P-EBT benefit.

- 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

Colorado will provide Summer P-EBT benefits to newly eligible children who (1) submit a F/RP meal application to their school by August 15 or (2) were actively receiving SNAP in June, July, and/or August, so they can be included in the September 1 Direct Certification file that CDHS sends to CDE. This means that children who apply for SNAP near the end of the covered summer period (e.g. August 1-15) may not receive Summer P-EBT benefits if their applications are not processed by County SNAP offices by the end of the month. Colorado will develop general messaging that encourages families to consider applying for F/RP meals directly through their school by the August 15 deadline in order to ensure they are included in Summer P-EBT benefits, even if they are also applying for SNAP.

CDE will follow the standard direct certification process by providing the September 1 file to schools to confirm student enrollment. A complete list of all newly eligible students (including those identified through the direct certification process) will be uploaded by schools through the September data collection for P-

EBT (described above). Summer P-EBT benefits for these newly eligible students will be issued in late October.

**Response:** [please use as much space as needed]

Please note a difference from the Colorado P-EBT School Year Plan. Colorado will issue P-EBT cards in each eligible child's name to streamline the issuance process and account for life events over time (such as changes in SNAP household composition, custody, or mailing addresses). Children who received a P-EBT card in their name during the School Year 20/21 issuance will receive benefits on that same card. However, children who had received their School Year 20/21 issuance on their household's SNAP EBT card will be issued a new card in their name. Child care PEBT issuance will continue to go to the SNAP EBT cards.

All other relevant parts of the Colorado School Year plan remain the same.

#### 4. Benefit Levels

##### A. U.S. standard Benefit

| 2021 Covered Summer Period                | U.S. Standard P-EBT Benefit                       |                  |                  |
|---|---|------------------|------------------|
|   | Median Length of Covered Summer Period (weekdays) | Daily P-EBT Rate | Standard Benefit |
| Contiguous U.S.                           | 55  | \$6.82           | \$375            |
| Alaska                                    | 55  | 10.99            | 604              |
| Hawaii, Guam, Virgin Islands, Puerto Rico | 55  | 7.97             | 438              |

##### B. State-Determined Benefit, Based on Daily Rate

Note: The daily benefit amount – \$6.82 – is only needed if a State elects to set its own covered summer period length; that is to say, if a State declines to use the U.S. standard benefit.

| 2021 Covered Summer Period                | Free Reimbursements |           |        |             |
|---|---------------------|-----------|--------|-------------|
|   | Lunch               | Breakfast | Snack  | 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>

**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.

**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 2021 plan after approval, the State needs to submit an amendment to FNS 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  
Karla Maraccini, Division Director, Food & Energy Assistance  
Colorado Department of Human Services



Brehan Riley, Director of School Nutrition  
Colorado Department of Education

**Date of Request:** ~~June 29, 2021~~ \_\_\_\_\_