



Food and Nutrition  
Service

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June 21, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Arkansas' State Plan for Children in Schools and Child Care

**TO:** Bill Ludwig  
Regional Administrator  
Southwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act) 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) authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Arkansas' enclosed plan to operate P-EBT for children in schools and child care.

### **Summary of State's Plan**

The Arkansas Department of Human Services and the Arkansas Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The State's plan for school children covers the months of August 2020 through May 2021. The State's plan for SNAP-enrolled children in child care covers the months of October 2020 through May 2021.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service through their schools or child care providers.

### **Children in Schools**

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on SY 2019-2020 eligibility data will have a means to address that they do not issue benefits to last year's graduates and non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, Arkansas will:

- use data reported by school districts to identify children who had elected a fully virtually learning model:
  - data will be pulled from this dataset every two months to determine whether a child's elected learning model has changed; a child's learning model as of the date data is pulled will be considered their learning model for the preceding two months,
  - set a constant monthly benefit for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year,
- use data reported by school districts for each month of the school year in a State system developed for COVID reporting purposes to identify schools with *planned* virtual instruction days and issue a single benefit amount to all eligible children in the school based on the number of virtual instruction days reported,
- use data reported by school districts to identify *unplanned* school closures due to COVID:
  - in cases where Arkansas can establish that the majority of grades transitioned from in-person to virtual learning due to COVID, all eligible children in the school will receive benefits for the unplanned closure,
  - in cases where Arkansas cannot establish that majority of grades transitioned from in-person to virtual learning due to COVID, eligible children may be issued benefits on a case-by-case through Arkansas' customer service process:
    - Arkansas will only issue benefits to these children if their eligibility based on having to transition from in-person to virtual learning can be verified by their school district,
- issue benefits for the months of August and September in a single distribution beginning July 7,
- issue benefits for the months of October and November in a single distribution beginning July 7,
- issue benefits for the months of December and January in a single distribution beginning July 30,
- issue benefits for the months of February and March in a single distribution beginning August 10, and
- issue benefits for the months of April and May in a single distribution beginning August 30.

### **Children in Child Care**

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the State will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Arkansas will:

- identify the county of residence for each SNAP-enrolled child under age 6,
- for each month from October through the end of the school year, determine whether any school in the county has at least one school that is issuing P-EBT benefits to its students:
  - if the State identifies at least one such school, all SNAP-enrolled children under age 6 will receive a P-EBT benefit equal to the highest P-EBT benefit for school children in that county for that month,
- issue benefits for the months of October and November in a single distribution beginning July 10,
- issue benefits for the months of December and January in a single distribution beginning July 30,
- issue benefits for the months of February and March in a single distribution beginning August 10, and
- issue benefits for the months of April and May in a single distribution beginning August 30.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

#### **Estimated Caseload and Value of P-EBT Benefits**

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State's plan.

- Arkansas estimates that it will issue \$283.5 million to approximately 277,700 school children for school closures and reductions in attendance and hours extending from August 2020 through May 2021.
- Arkansas estimates that it will issue \$17.9 million to approximately 47,200 SNAP-enrolled children in child care from October 2020 through May 2021.

#### **Release of Information**

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Arkansas. Section 1101(e) of the Act states, "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."

**Plan Timetable and Revisions**

Arkansas will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

**Civil Rights**

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

**Administrative Funds**

The Arkansas Department of Human Services will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State's operational plan evolves.

**Reporting**

The Arkansas Department of Human Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Arkansas' commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Southwest Regional Office.

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs