



Food and Nutrition
Service

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April 13, 2021

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

TO: Willie Taylor
Regional Administrator
Southeast 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 Alabama's enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Alabama Department of Human Resources and the Alabama State 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, Alabama has or will:

- issue benefits for the months of August through December 2020 in a single distribution, tentatively scheduled for May 2021,
- issue benefits for January through May 2021 in July 2021,
- collected and will continue to collect monthly learning schedules from each school no less frequently than every other month,
- identify each school's predominant learning model for the month (fully virtual, fully in-person or hybrid schedule):
 - consider schools to be predominately virtual in a given month if more than 50% of children have fully virtual schedules; schools will be considered predominately in-person in a given month if more than 50% of children have fully in-person schedules; all other schools will be considered predominately hybrid for the month,
- provide the same benefit to all students within a school based on the predominant learning mode of the school for the month:
 - ALSDE will separately identify children whose parents elected to have the child participate entirely virtually, and will issue fully virtual benefits to those children regardless of the school's learning model,
- used data from ALSDE to determine that the average hybrid schedule across the state consisted of 2.5 virtual days per week; used that to set an average hybrid benefit of 9 days per month; the state will continue to collect schedule data and reassess this benefit if necessary, and
- set a constant monthly benefit equal to 18 days for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.

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, Alabama will:

- issue benefits for the months of October through December 2020 in a single distribution, tentatively scheduled for June 2021,
- issue benefits for January through May 2021 in July 2021,
- 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 closed or offering only distance learning to its students:
 - if the State identifies at least one such school, all SNAP-enrolled children under age 6 will receive a full P-EBT benefit in the same amount as the children in the county's closed or fully distance learning schools;

- if the State does not identify at least one such school, but identifies at least one school offering mixed in-person/distance learning, then all SNAP enrolled children under age 6 will receive a partial P-EBT benefit in the same amount as the children in the county's mixed in-person/distance learning schools.

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.

- Alabama estimates that it will issue \$406 million to approximately 472,600 school children for school closures and reductions in attendance and hours extending from August 2020 through May 2021.
- Alabama estimates that it will issue \$110.6 million to approximately 112,600 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 Alabama. 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

Alabama 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

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

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

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs