



Food and Nutrition
Service

1320 Braddock Place
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August 16, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of American Samoa's Plan for School Children**

**TO: Jesus Mendoza, Jr.
Regional Administrator
Western 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 the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves American Samoa's enclosed plan to operate P-EBT for school children.

Summary of American Samoa's Plan

The American Samoa Department of Human and Social Services and the American Samoa Department of Education will issue P-EBT benefits through American Samoa's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. American Samoa's plan covers the months of August 2020 through February 2021.

Children are eligible 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. American Samoa 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 at school.

American Samoa 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, American Samoa will:

- issue benefits for eligible days from August 2020 through February 2021:
 - American Samoa has established that children attending public schools had either 2 or 3 virtual days per week from August 31, 2020 through October 9, 2020,

- American Samoa has established that children attending one private school had one virtual day per week from August 31, 2020 through December 18, 2020,
- American Samoa has established that children attending one private school had two weeks of fully virtual learning from February 1, 2021 through February 12, 2021,
- calculate benefits for each student based on the student's number of virtual learning days; the state will not calculate average benefits for any students,
- require households to submit an application to provide data necessary to issue P-EBT:
 - tentatively begin processing applications in September,
 - tentatively set an application submission deadline in October,
 - confirm children's eligibility and set benefit levels using school data,
- tentatively issue P-EBT benefits to all households in November.

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

Estimated Caseload and Value of P-EBT Benefits

American Samoa 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 American Samoa's plan.

American Samoa estimates that it will issue \$1.3 million to approximately 11,100 children for school closures and reductions in attendance and hours extending from August 2020 through February 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 American Samoa. 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

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

Civil Rights

American Samoa 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 American Samoa 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 American Samoa's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as American Samoa's operational plan evolves.

Reporting

The American Samoa 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 American Samoa's commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs