



Food and Nutrition
Service

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March 22, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of American Samoa's Plan for School Children,
School Year 2021-2022

TO: Jesus Mendoza
Regional Administrator
Western Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, 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 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 Nutrition Assistance Program (NAP) system to households with eligible children. American Samoa's plan for school children covers the months of February 2022 through June 2022.

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. 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 eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2020-2021 graduates and other 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 has or will:

- confirmed that no children lost access to school meals due to concern about COVID-19 prior to February when the territory confirmed the first community spread of the coronavirus,

- closed all public and private NSLP-participating schools to in-person instruction on February 22,
- tentatively issue benefits for the months of February through June in a single distribution in July,
- receive a list from LEAs and private schools monthly that contains information with the names of students enrolled in eligible schools,
- calculate benefits for each student for the duration of the school closure that began February 22:
 - if schools reopen before the end of the year, schools will track COVID-related absences and virtual learning days in American Samoa's student information system,
 - the Department of Education will pull these P-EBT eligible days from the SIS at the end of each month and calculate a benefit for issuance in July based on the student's actual number of eligible virtual learning days and COVID-related absences,
- require households to submit an application to provide data necessary to create a P-EBT case file unless they previously participated in P-EBT,
- provide guidance to schools detailing the requirements for:
 - determining school eligibility based on school closures or reductions in attendance and hours,
 - determining what is a COVID-related absence and,
 - recording students' COVID-related absences and virtual learning days.

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 its plan.

- American Samoa estimates that it will issue \$8.8 million to approximately 14,000 children for school closures and reductions in attendance and hours extending from February 2022 through June 2022.

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 and Social 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 and Social 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 exceptional efforts to maintain children's access to nutritious meals, and understands that even as the nation recovers from this difficult time, State agencies and local program operators will still face any number of challenges. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long
Administrator