



Food and Nutrition
Service

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July 7, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Arkansas' State Plan for Children in Child Care,
School Year 2021-2022

TO: Bill Ludwig
Regional Administrator
Southwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, authorized a temporary assistance program for households with 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 child care.

Summary of State's Plan

The Arkansas Department of Human Services and the Department of Education, Division of Secondary and Elementary 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 SNAP-enrolled children in child care covers the months of September 2021 through May 2022.

Children in child care are eligible for benefits 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 covered child care facility.

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP in the benefit month. 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 SNAP-enrolled children under age 6,
- for each month from August through May, determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2021-2022 to the same months prior to the pandemic,
- calculate a separate P-EBT benefit for each month of the school year where CACFP data indicates a reduction in child care access:

- for the benefit months of August 2021 through December 2021 calculate the reduction in CACFP lunch claims relative to the months of August 2019 through December 2019,
- for the benefit months of January 2022 through May 2022 calculate the reduction in CACFP lunch claims for January 2022 through March 2022 relative to the pre-pandemic months of January 2020 through February 2020 plus March 2019:
 - if April 2022 data are complete and available in time for use in Arkansas' August issuance, the state will add April 2022 lunch claims to its current year total, and April 2019 claims to its pre-pandemic total,
- multiply the calculated reduction in lunch claims to the average monthly number of instructional days for school children (17.8 days) and the daily benefit amount to determine the P-EBT benefit for the month,
- provide USDA with the state's calculations and tentative monthly benefit amounts for confirmation prior to issuing benefits,
- confirm that lunch claims, for the most current months in spring 2022 where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months,
- tentatively issue a single benefit for the August 2021 through May 2022 period in August 2022.

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 \$13.0 million to approximately 48,100 SNAP-enrolled children in child care from August 2021 through May 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 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' 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 Southwest Regional Office.

Sincerely,

Cindy Long
Administrator