



Food and Nutrition  
Service

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June 9, 2022

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Arkansas' State Plan for School Children,  
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 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 school children.

### **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 September 2021 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. 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 at school.

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 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, Arkansas has or will:

- tentatively issue benefits for the months of August 2021-May of 2022 in a single distribution over the months of August and September 2022,
- use data reported by public school districts in the state's standard student information system (eSchool) to identify children who are certified for free or reduced price school meals and children who elected a virtual learning model;

collect comparable information through a separate data collection from NSLP-participating private schools:

- the state will pull this information from eSchool at the end of each semester (in December and May),
- children's free or reduced price status at the time of each data pull will apply retroactive to the beginning of that semester,
- since students must elect virtual status for a full semester, the students' virtual status at the end of each semester is a reliable indicator of their virtual status for the semester,
- issue benefits automatically to children in NSLP-participating schools who elected fully virtual status:
  - 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; this will equal 18 days' worth of benefits per month,
- issue benefits to children who did not elect virtual status through a parent application:
  - school districts will provide a P-EBT application for households with children who were absent from school because of a COVID related isolation/quarantine or other absence,
  - the family will attest that specific absence days are COVID-related,
  - the school will verify that the absences were COVID-related (if the school is tracking that information) or that the absences were excused (if they are not capturing reason codes for student absences) prior to reporting a child as eligible,
  - benefits will be calculated based on the number of days absent due to COVID multiplied by the daily rate of \$7.10.

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 \$14.5 million to approximately 101,000 children for school closures and reductions in attendance and hours extending 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