



Food and Nutrition  
Service

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August 2, 2022

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

**TO:** Jesus Mendoza, Jr.  
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 California's enclosed plan to operate P-EBT for school children.

### **Summary of State's Plan**

The California Department of Social Services and the California 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 2021 through May 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, California has or will:

- tentatively issue benefits for the months of August through December in a single distribution in November,
- tentatively issue benefits for the months of January through May in a single distribution in November/December,

- use schools' most current free and reduced price eligibility lists to identify students who may qualify for P-EBT benefits:
  - newly income-eligible students will be eligible for benefits from the beginning of the school year,
- conduct an ad-hoc data collection to identify children who participated in virtual learning Independent Study (IS):
  - all schools were required, by state law, to offer students IS option for COVID-related reasons in school year 2021-2022; all schools used a special IS code to capture these days,
  - the state will confirm the total number of days students were enrolled in independent study for each month from August 2021 through May 2022,
- conduct an ad-hoc data collection to identify all other students with COVID-related absences or virtual learning days in the previous month:
  - excused absences that total 5 or more within a single month will be considered P-EBT-eligible, COVID-related absences,
  - families may make a claim with the state through its call center for any COVID-related absence that totals fewer than 5 days in a month:
    - the family will verbally attest that the absence days are COVID-related and the state will retain a record of the parent or guardian's attestation, and
    - the state will verify that the absences claimed as COVID-related by the family in a given month were no greater than the number of excused absences in the same month using the absence data provided by the schools, prior to issuing benefits for those days,
- calculate benefits for each income-eligible student based on the student's number of eligible virtual learning (IS) days and COVID-related absences each month:
  - for those in a fully virtual schedule, this will equal 18 days' worth of benefits per month.

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.

- California estimates that it will issue \$900 million to approximately 1.5 million 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 California. 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**

California 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**

California 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 California Department of 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 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 California Department of 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 California’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