



Food and Nutrition  
Service

1320 Braddock Place  
Alexandria, VA  
22314

March 22, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of the District of Columbia State Plan for Children in Schools  
and Child Care

**TO:** Dr. Patty Bennett  
Regional Administrator  
Mid-Atlantic 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 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 the District's enclosed plan to operate P-EBT for children in schools and child care.

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

The District of Columbia Department of Human Services and the District's Office of the State Superintendent 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 and SNAP-enrolled children in child care covers the months of October 2020 through June 2021.

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. Children in child care are eligible 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 schools or child care providers.

### **Children in Schools**

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 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, the District will:

- issue benefits on the following schedule:
  - for the months of October through December in April,
  - for the months of January through March in May,
  - for the months of April through June in June,
- 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,
- for each month from October 2020 through January 2021, fewer than 1% of student-days were attended in person per month in DCPS and non-DCPS schools, pursuant to District public health guidance; therefore, the District will issue fully-virtual benefits for all schools for this period,
- establish operating status at the school-level using updated ratios of in-person student days each month starting in February. A school's learning model will be deemed virtual if less than 50% of student-days were attended in-person; otherwise, the learning model will be deemed hybrid. The June status will be calculated using May data,
- reassess the benefit for children attending hybrid schools based on the collection of average updated school schedules no less frequently than every two months,
- not issue to children placed in non-NSLP schools pending further communication with USDA.

### **Children in Child Care**

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. 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, the District will:

- issue benefits on the same schedule as for children in school,
- issue benefits at the fully virtual rate for all children until the District-wide aggregate count of in-person student-days reaches 50%,
- if hybrid benefits are issued, use the District's average hybrid rate for children in school for the same period.

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.

- The District estimates that it will issue \$80.7 million to approximately 73,000 school children for school closures and reductions in attendance and hours extending from October 2020 through June 2021.
- The District estimates that it will issue \$13.3 million to approximately 12,000 SNAP-enrolled children in child care from October, 2020 through June 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 the District. 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**

The District 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**

The District 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 District of Columbia 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 District of Columbia 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 the District’s commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Mid-Atlantic Regional Office.

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs