



Food and Nutrition  
Service

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March 23, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Idaho's State Plan for School Children**

**TO:** Jesus Mendoza, Jr.  
Regional Administrator  
Western 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 the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Idaho's enclosed plan to operate P-EBT for school children.

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

The Idaho Department of Health and Welfare (DHW) and the Idaho State Department of Education (SDE) will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. The State's plan covers the months of August 2020 through June 2021.

Children are eligible 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 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.

Idaho has or will:

- developed software to collect student-level eligibility for school meal benefits and school-level predominant learning models (virtual, in-person, or hybrid) specifically to support P-EBT:
  - all public and private NSLP-participating schools will submit the information to their SFAs specific to each month of the school year in May 2021,

- SDE will create and send monthly payment files to DHW with 2 to 3 month increments of benefits,
- issue all school year 2020-2021 benefits in three monthly installments beginning in July 2021,
- calculate benefits on a weekly basis at three levels; students will receive:
  - 3 days of benefits per week in schools with a fully hybrid schedule,
  - 1 day of benefits per week in schools that have moved from a fully hybrid schedule to 1 virtual day per week in anticipation of returning to a fully in-person schedule, and
  - 5 days of benefits per week in schools with a fully virtual status,
  - the maximum benefit in any month is 19 days, or the number of instructional days in the year divided by the number of benefit months (9 months from September through May),
- set the State's benefit levels based on a survey of SFAs representing a third of the State's students; the state will review updated schedule information from SFAs at least once more before the end of the school year and adjust its benefit levels if necessary.

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.

Idaho estimates that it will issue \$65.5 million to approximately 126,000 children for school closures and reductions in attendance and hours extending from September 2020 through May 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 Idaho. 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**

Idaho 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**

Idaho 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 Idaho Department of Health and Welfare 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 Idaho Department of Health and Welfare will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Idaho's commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs