

June 10, 2021

Food and Nutrition Service

1320 Braddock Place Alexandria, VA 22314 SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT) Approval of Illinois' State Plan for Children in Child Care

TO: Vista Fletcher Regional Administrator Midwest 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 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 Illinois' enclosed plan to operate P-EBT for children in child care.

#### Summary of State's Plan

The Illinois Department of Human Services and the Illinois State Board 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 SNAP-enrolled children in child care covers the months of October 2020 through June 2021.

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 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, Illinois has or will:

- determined for each month from October through March, that all counties had at least one school whose students received P-EBT benefits,
  - confirm that all counties had at least one school whose students received P-EBT benefits for each month from April through June before issuing benefits for those months,

- issue a P-EBT child care benefit to all SNAP-enrolled children under age 6 in counties with at least one school whose students received P-EBT benefits in the month,
- issue a fixed monthly child care benefit for October through March equal to the average statewide P-EBT benefit for school children for those months; issue a fixed monthly child care benefit for April through June equal to the average statewide school benefit for those months,
- prior to issuing any child care benefit, determine whether the child has already received a P-EBT school benefit for that month:
  - if the child has already received a school P-EBT benefit for that month, no child care P-EBT benefit will be issued,
  - if the child has not received a school P-EBT benefit for that month, the child will be issued a child care P-EBT benefit,
- issue benefits for the months of October through March in June:
  - the State will track these as separate monthly issuances although they will be available to the beneficiary at the same time,
- issue benefits for the months of April through June in August.

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.

Illinois estimates that it will issue \$268.0 million to approximately 336,400 SNAPenrolled 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 Illinois. 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

Illinois 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**

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

Sincerely,

Cindy Long Deputy Administrator Child Nutrition Programs