



Food and Nutrition
Service

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April 23, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Kansas' State Plan for Children in Schools and Child Care

TO: Cheryl Kennedy
Regional Administrator
Mountain Plains 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 Kansas' enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Kansas Department for Children and Families and the Kansas State 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 2020 through May 2020. The State's plan for SNAP-enrolled children in child care covers the months of October 2020 through May 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, Kansas has or will:

- surveyed all LEAs in December to collect learning methods and the number of remote learning days, for each of the months from August through December, at the elementary, middle, and high school levels; will survey LEAs again in the spring to collect the same data for the months of January through May:
 - although each LEA sets learning method policy for its schools, the State recognizes that there may be occasional exceptions in learning method by individual schools in a given month; the State will ask schools to report those exceptions to the State through an additional survey question,
- use the virtual learning days reported by the LEAs to calculate P-EBT benefits specific to each LEA, by month, at the elementary, middle, and high school levels; will use school-specific virtual learning days in place of the LEA-level figures when a school reports a learning model different than LEA policy,
- issue benefits to SNAP-participant households automatically using lists of directly certified students submitted by the LEAs to the State,
- issue benefits to non-SNAP households through an application process:
 - LEAs will provide the names of non-directly-certified free and reduced price certified students to the State;
 - the State will issue a unique identifier to each household with certified children that will enable them to access an online application to provide necessary contact information; the identifier also serves to validate that P-EBT benefits are issued only to children certified for free or reduced price meals;
 - households that do not receive an identifier from the State will be instructed to fill out a school meal application with their LEA,
- to the extent possible, issue benefits for August through May to SNAP-participant families within 45 days of plan approval,
- issue benefits to non-SNAP families as the State processes applications.

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, Kansas will:

- identify SNAP-enrolled children under age 6,
- for each month from October through the end of the school year, determine whether the child's residence lies in the boundaries of an LEA with schools that are operating virtually or on a hybrid schedule,
 - set the P-EBT child care benefit to the level issued to elementary school children in the LEA for the month,

- for children who do not live in the boundaries of an LEA with one or more schools operating virtual or hybrid schedules, the State will offer households an application:
 - the application will collect the names of the children in child care along with the names and addresses of their child care providers;
 - the State will determine whether the address of the provider is in the area of an LEA offering virtual or hybrid instruction to its students; if confirmed, the State will issue benefits as described above; if not confirmed the State may attempt to confirm that the facility is closed or operating at reduced attendance or hours;
 - the State will confirm that any child determined eligible through the application process is a current SNAP recipient under age 6,
- issue benefits for October through May in a single distribution as soon as possible after plan approval.

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.

- Kansas estimates that it will issue \$48.1 million to approximately 225,000 school children for school closures and reductions in attendance and hours extending from August 2020 through May 2021.
- Kansas estimates that it will issue \$23.5 million to approximately 30,000 SNAP-enrolled children in child care from October, 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 Kansas. 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

Kansas 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

Kansas 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 Kansas Department for Children and Families 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 Kansas Department for Children and Families will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

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

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs