



Food and Nutrition
Service

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March 9, 2023

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Louisiana State Plan for Children in Schools
and Child Care, School Year 2022-2023

TO: Bill Ludwig
Regional Administrator
Southwest 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 Louisiana's enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Louisiana Department of Children and Family Services and the Louisiana 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 covers the months of August 2022 through May 11, 2023.

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 facilities.

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 eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2021-2022 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. The state will also provide a path for households with eligible homeschooled children and children in fully virtual schools to receive benefits; these children may be eligible if they began homeschooling or enrolled in fully virtual school due to concerns about the COVID health emergency.

In addition, Louisiana has or will:

(for children currently enrolled in NSLP-participating schools)

- provide a web portal for school districts to upload the names of children with virtual learning days or COVID related absences in each month of the school year:
 - schools will report the names of children approved for fully virtual instruction who attend NSLP-participating schools,
 - schools are also tracking children who miss school for COVID-related reasons such as quarantines and other absences recognized by the schools as COVID related,
- calculate benefits for each income-eligible student based on the student's number of eligible virtual learning days and COVID-related absences; the state will use a tiered benefit:
 - children with 1-5 days of virtual learning or absences due to COVID in a month will receive benefits equal to 3 days of meal benefits,
 - children with 6-15 days of virtual learning or absences due to COVID in a month will receive benefits equal to 10 days of meal benefits; however, no child will receive benefits for more than 9 instructional days in May if the PHE ends, as expected, on May 11,
 - children with at least 16 days of virtual learning or absences due to COVID in a month will receive benefits equal to 18 days of meal benefits,
- 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; if the student's virtual status changes and they begin receiving meals at school, the state will reduce or end the P-EBT benefit, as appropriate to the circumstances,
- utilize an online customer portal and call center for parents to answer general questions about the program and to resolve disputes or issuance errors; the state will work with school food directors as necessary, to validate information from parents,
- tentatively issue benefits for the months of August through April in a single distribution in May,
- tentatively issue benefits for the month of May in June.

(for eligible children attending non-NSLP virtual schools and eligible homeschooled children)

- conduct a public information campaign to encourage households of potentially eligible children to apply for benefits:
 - the state's public information campaign will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children enrolled in homeschool or virtual school

- from the start of the public health emergency and the date of the plan approval by USDA,
- create a P-EBT application utilizing the current FRL application to collect the information necessary to confirm children’s eligibility for P-EBT benefits:
 - applicants will apply in person for P-EBT at the local public school that they would have attended this year if they were not homeschooled or attending a non-NSLP-participating virtual school,
 - applicants will provide basic contact and demographic information for parents/guardians and the child,
 - applicants will indicate whether their children are homeschooled or enrolled in a virtual school; applicants will select the reason their children attend a non-NSLP virtual school or are homeschooled; only applicants that select COVID concerns as the reason will be potentially eligible for P-EBT:
 - children currently enrolled in virtual school will provide the name of the virtual school; the local school will contact the virtual school and confirm enrollment at the named virtual school,
 - children who are currently homeschooled in Louisiana must be registered with the state DOE; homeschooled applicants must provide proof of registration to the local public school when applying,
 - applicants will provide the names of their children’s previous NSLP-participating schools or applicants will indicate that their children have never been in an NSLP school (if the children are in kindergarten through second grade or moved into the state after the start of the pandemic and have always been homeschooled or always enrolled in a virtual school):
 - for non-K-2 children previously enrolled in an NSLP-participating school the school will match the children’s names to the school’s previous year enrollment lists (or contact the children’s previous schools) for confirmation of their previous enrollment at some point on or after the start of the pandemic,
 - the school will collect information (such as but not limited to SNAP case number) to determine categorical eligibility for free meals; the school will also determine whether the child’s address falls within the attendance zone if the school participates in CEP,
 - for children who are not categorically eligible for free meals or whose local public school does not participate in CEP, the school will confirm income eligibility through the P-EBT portal’s free and reduced price meal application:
 - children determined income eligible for free or reduced price meals will be assumed income eligible back to the start of the school year if they submit their P-EBT applications in the first month of the application portal’s availability; other households

- will be assumed income eligible from the date of their P-EBT application,
 - the school will use the income documentation provided by applicants to confirm that the documentation matches the income entered on the application for all applications received,
 - the state will provide USDA the opportunity to review the application prior to implementation,
 - issue benefits to homeschooled and virtual school students for up to 171 instructional days given the anticipated end of the public health emergency on May 11:
 - parents may submit applications beginning in March, and must submit all applications by July 31 in order to give the state time to issue all benefits by September 30, 2023,
 - the state will issue benefits for these children as their applications are processed.

Children in Child Care

At a minimum, the state will identify all children under age 6 who are enrolled in SNAP in the benefit month. 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, Louisiana has or will:

- identify SNAP-enrolled children under age 6,
- identify and issue May P-EBT benefits for children under 6 in households that applied for SNAP between May 1 and May 11, and were approved to receive SNAP benefits for that time period,
- determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2022-2023 to the same months prior to the pandemic,
- issue an average monthly benefit to all eligible children statewide for the months Louisiana experienced a reduction in child care access:
 - use the reduction in claims for all months available for fall 2022 compared to the same months in 2019 to calculate and issue benefits for August through December 2022,
 - use the reduction in claims for January through April 2023 compared to January through February 2020 and March through April 2019 to calculate and issue benefits for January through May 2023; if April 2023 data are not available in time to use in the calculation, the state will use data for January through March,
 - for all benefit months except May 2023, multiply the reduction in claims by the average monthly number of instructional days for school children in the same months (180 days over 10 benefit months for an average of 18 days per month), and by \$8.18, to determine the average monthly benefit,

- for the month of May, set the benefit to half of the monthly spring semester benefit to account for the anticipated May 11 end of the public health emergency,
- provide USDA with the state’s tentative average fall and spring semester benefits for confirmation prior to issuing benefits,
- confirm that lunch claims, for the most current months where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months,
- tentatively issue benefits for August through December 2022 in early July 2023,
- tentatively issue benefits for January through May in late July 2023.

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.

- Louisiana estimates that it will issue \$5.3 million to approximately 37,000 school children for school closures and reductions in attendance and hours extending from August 2022 through May 11, 2023.
- Louisiana estimates that it will issue \$40.6 million to approximately 118,000 SNAP-enrolled children in child care from August 2022 through May 11, 2023.

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 Louisiana. 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

Louisiana 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

Louisiana will continue to comply with civil rights requirements by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

Administrative Funds

The Louisiana Department of Children and Family 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 Louisiana Department of Children and Family Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS values Louisiana's partnership in the administration of Pandemic EBT. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Southwest Regional Office.

Sincerely,

Cindy Long
Administrator