



Food and Nutrition  
Service

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June 16, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Montana's State Plan for Children in 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 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 Montana's enclosed plan to operate P-EBT for children in child care.

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

The Montana Human and Community Services Division and Office of Public Instruction 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, Montana will:

- issue benefits for the months of October through June in a single issuance in July,
- confirm monthly eligibility and county of residence for SNAP enrolled children under the age of 6,

- for each month from October through the end of the school year, determine whether the county or any contiguous counties have at least one school that is operating with a predominantly hybrid or predominately virtual schedule:
  - if the State identifies at least one school that is operating predominantly virtually, all SNAP-enrolled children under age 6 will receive the State’s P-EBT benefit for fully virtual school children;
  - if the State does not identify at least one school operating predominantly virtually, but identifies at least one school operating with a predominantly hybrid schedule, then all SNAP-enrolled children under age 6 will receive the State’s hybrid benefit,
  - if the State does not identify at least one school operating with a predominantly hybrid or virtual schedule, the State will determine if that county or a contiguous county is experiencing a reduction in child care access each month using administrative data:
    - the State will determine whether child care facilities in the county experienced an overall 25%+ reduction in child care capacity from the state’s licensing agency or an overall 25%+ reduction in CACFP meal claims for the month,
    - children in counties (or contiguous counties) where a reduction in child care access that has been established by this method will receive a benefit equal to the statewide average P-EBT benefit for school children in the same month.

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.

Montana estimates that it will issue \$15.4 million to approximately 14,500 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 Montana. 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**

Montana 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**

Montana 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 Montana Human and Community Services Division 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 Montana Human and Community Services Division will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Montana's 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