



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
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February 8, 2021

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

TO: Vista Fletcher
Acting 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 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 Minnesota's enclosed plan to operate P-EBT for school children.

Summary of Minnesota's Plan

Minnesota Department of Human Services and the Minnesota Department of Education 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 September 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.

In addition, Minnesota has or will:

- issue benefits for the months of September and October in March; will issue additional retroactive two-month benefits every month from April through July,
- stagger monthly issuances over three days after SNAP issuances,

- added capability to their school learning model portal allowing for public and non-public school districts to report grade-specific learning model information, identify which students elected distance learning, and provide addresses,
- collect data from school districts through the portal beginning in February; school districts will report information specific to each month from September through January in their February data submission, and will report updated information monthly through the end of the school year,
 - randomly select a group of 10-15 districts operating hybrid models (representative of districts with a range of sizes and locations) and use the most common number of virtual days per week in their hybrid schedules to calculate the hybrid benefit amount; determined at the time of plan submission that an 11 day average benefit is a reasonable reflection of hybrid schedules across the state for the State's first benefit issuance,
 - reassess the hybrid benefit using the same method in April and June; if justified by the data, the State will continue to use a single statewide average benefit,
- set a constant fully virtual benefit equal to 19 days per month for September through May by dividing the number of instructional days by the number of benefit months; the State will issue a partial benefit for June,
- issue either a fully virtual benefit or a hybrid benefit based on the model each grade level used for the majority of the month,
- issue a fully virtual benefit to students who elect a virtual schedule for at least 19 days in a month regardless of their grade's learning model; the State will issue the hybrid benefit to students in grades with an in-person model who elect a virtual schedule for 11-18 days per 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.

Minnesota estimates that it will issue \$372.8 million to approximately 385,000 children for school closures and reductions in attendance and hours extending from September 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 Minnesota. 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

Minnesota 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

Minnesota 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 Minnesota 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 Minnesota 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 Minnesota’s 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