



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

January 12, 2023

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

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

Summary of State's Plan

The 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 households with eligible children. The State's plan covers the months of September 2022 through June 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, Minnesota has or will:

(for children currently enrolled in NSLP-participating schools)

- communicate the P-EBT eligibility requirements to NSLP-participating schools including current eligibility for free or reduced price meals and lack of access to meals at school due to a COVID-related absence or school-approved COVID-related virtual learning day,
- require NSLP-participating schools to enter each student's P-EBT eligible days into the state's P-EBT data portal:
 - NSLP schools that are tracking COVID-related absences and virtual learning days will report the dates of P-EBT-eligible days for each student,
 - parents of children with COVID-related absences or virtual learning days in NSLP schools that are not tracking that information will contact their schools and attest that specific days are COVID-related; the schools will confirm that the days are recorded as excused absences before entering those days into the P-EBT data portal,
- monitor the P-EBT data submitted by the NSLP schools; the state will contact the NSLP schools if it identifies a number of P-EBT eligible days for any student in excess of a given threshold or if it identifies submissions that are inconsistent with local COVID incidence reports,
- validate household mailing addresses using USPS software to ensure cards are mailed to valid addresses,

(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 submit applications for P-EBT benefits; this will include outreach to virtual schools and to homeschool associations:
 - the state will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children who enrolled in a fully virtual institution or began homeschooling since the January 27, 2020 start of the pandemic due to concerns about COVID,
- parents of children in district-sponsored virtual schools will submit their P-EBT applications to that district,
- parents of children who unenrolled from their NSLP-participating schools to begin homeschooling or to enroll in a fully virtual school at some point after the start of the pandemic will submit their applications to their former NSLP-participating school district,
- parents of children who began school after the start of the pandemic and have always been homeschooled or enrolled in virtual school will submit their applications to the local school district that their children would have attended if not for the COVID emergency:

- parents of these children will request a State Student ID from the school district as part of their P-EBT application; the local school district will obtain necessary documentation to confirm the child's identity before assigning an ID,
- the application will consist of a school year 2022-2023 free and reduced price meal application, documentation to support the application's income sources, and a set of supplementary questions to confirm the remaining eligibility criteria:
 - all applicants will be asked whether their children attend a non-NSLP virtual school or are homeschooled **due to concerns about COVID**,
 - the application will collect information (such as but not limited to SNAP case number) to determine categorical eligibility for free meals,
 - the application will not ask for the name of the local public school that the child would have attended if the child was not homeschooled or enrolled in a non-NSLP-participating virtual school, so the application will not determine whether the local public school participates in CEP or a Special Provision that would have qualified the child for free meals; instead, the applicant will complete the application's income section,
 - school districts will use the income documentation provided by applicants to verify their income eligibility as follows:
 - the school will confirm that the documentation matches the income entered on the application for **at least** the first 100 applications received; the state will encourage districts to review the documentation for all applications,
 - if the error rate on the first 100 applications is below 5 percent, the school may elect to verify 10 percent of remaining applications; if the error rate is higher, the school will continue to verify all applications,
 - the application will require parents to promptly notify the school if their children return to an in-person school during the school year,
 - school districts will enter the names of virtual and homeschooled children with approved P-EBT applications, along with their number of P-EBT eligible days, into the state's P-EBT portal at the end of the school year,
 - the Minnesota Department of Education will use the State Student IDs on the applications submitted through the portal to confirm the children's enrollment in an NSLP-participating school after January 2020:
 - for children who began school after the start of the pandemic, and have always been homeschooled or enrolled in a virtual school, the state will use the Student ID issued by the child's local public school to confirm the child's existence,
- tentatively issue benefits for children enrolled in NSLP-participating schools as follows:

- benefits for the months of September through December in April or May,
- benefits for the remaining months of the school year or the end of the PHE in July:
 - the state will also issue benefits for September through December in July to children who may have been missed in the April/May issuance,
- tentatively issue benefits for most homeschooled children and children in non-NSLP-participating virtual schools in July:
 - the state will issue partial benefits to these students in April or May if their applications are approved in time for the earlier issuance.

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, Minnesota has or will:

- identify SNAP-enrolled children under age 6,
- 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 benefit to all eligible children statewide for the months Minnesota experienced a reduction in child care access:
 - the state will use the most recent months of fall semester CACFP claims data available at the time it calculates and issues a fall semester benefit in April,
 - the state will use the most recent months of spring semester CACFP claims data available at the time it calculates and issues a spring semester benefit in July,
 - multiply the reduction in claims by the average monthly number of instructional days for school children (172 days over 9 benefit months for an average of 19.1 days per month), and by \$8.18, to determine the average monthly benefit,
- provide USDA with the state's tentative average benefit for confirmation prior to issuing benefits for the fall and spring semesters,
- confirm that lunch claims, for the most current months in spring 2023 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 the months of September through December in April 2023,
- tentatively issue benefits for the months of January through May in 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.

- Minnesota estimates that it will issue \$4.8 million to approximately 51,000 school children for school closures and reductions in attendance and hours extending from September 2022 through June 2023.
- Minnesota estimates that it will issue \$24.3 million to approximately 90,000 SNAP-enrolled children in child care from September 2022 through June 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 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 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 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 values Minnesota'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 Midwest Regional Office.

Sincerely,

Cindy Long
Administrator