



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

June 10, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Missouri's 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 Missouri's enclosed plan to operate P-EBT for children in schools and child care.

Summary of Missouri's Plan

The Missouri Department of Social Services and the Missouri Department of Elementary and Secondary Education will issue P-EBT benefits through the Missouri's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The Missouri's plan for school children covers the months of August 2020 through May 2021. The Missouri'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, Missouri has or will:

- conducted a survey of school districts in May 2021 that identified the predominant learning mode of each school by month,
- require households to submit an application in order to receive P-EBT benefits:
 - confirm children’s eligibility using data provided by school districts,
 - assign benefit levels based on the predominant learning model at their school,
- use schedule data collected from school districts to set a single statewide average hybrid benefit equal to 11.4 days for children determined to have a hybrid schedule,
- set a constant monthly benefit equal to 19 days for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year,
- issue benefits for the months of September through May in a single distribution on a rolling basis as applications are processed.

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, Missouri will:

- identify the county of residence for each SNAP-enrolled child under age 6,
- identify the county of residence for each SNAP-enrolled 6-year-old child who is recorded in the State’s integrated eligibility system as being enrolled full time, during the day, in day care,
- for each month from October through the end of the school year, determine whether the county had at least one school where the predominant learning model is either virtual or hybrid:
 - if the State identifies at least one fully virtual school in that county or any contiguous counties, all SNAP-enrolled children under age 6 and the SNAP-enrolled 6-year-old children noted above will receive a P-EBT benefit equal to the fully virtual P-EBT benefit for school children,
 - if the State identifies at least one fully hybrid school in that county or any contiguous counties, all SNAP-enrolled children under age 6 and all SNAP-enrolled 6-year-old children noted above will receive a P-EBT benefit equal to the hybrid P-EBT benefit for school children,

- issue benefits for the months of October through May in a single issuance 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 Missouri's plan.

- Missouri estimates that it will issue \$96.4 million to approximately 118,500 school children for school closures and reductions in attendance and hours extending from September 2020 through May 2021.
- Missouri estimates that it will issue \$108.9 million to approximately 150,000 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 Missouri. 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

Missouri 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

Missouri 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 Missouri Department of Social 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 Missouri's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the Missouri's operational plan evolves.

Reporting

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

FNS appreciates Missouri'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