Food and Nutrition Service

1320 Braddock Place Alexandria, VA 22314 June 6, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)

Approval of Missouri's State Plan for School Children,

School Year 2021-2022

TO: Cheryl Kennedy

Regional Administrator

Mountain Plains 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 Missouri's enclosed plan to operate P-EBT for school children.

# **Summary of State's Plan**

The Missouri Department of Social Services and the Missouri Department of Secondary and Elementary 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 for school children covers the months of August 2021 through June 2022.

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. 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 eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2020-2021 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.

In addition, Missouri will:

- use schools' most current free and reduced price eligibility lists to identify students who may qualify for P-EBT benefits:
  - o all school districts reset children's free and reduced price status at the beginning of this year through new applications and direct

- certification; the state will not rely on free and reduced price status from school year 2020-2021 or 2019-2020,
- newly income-eligible students will be eligible for benefits starting from the beginning of the school year,
- collect student-level information for each month of the school year from public and private schools through a state-created portal:
  - o schools will provide the names of students with approved fully virtual schedules in NSLP-participating schools and sites,
  - schools will provide the names of all other students with COVIDrelated absences or virtual learning days:
    - schools that are tracking COVID-related absences and virtual learning days will provide the actual count of those days for each month,
    - schools that cannot track COVID-related absences will instead report blocks of excused absences of 5 or more consecutive days:
      - for households of children attending schools using the 5 consecutive day threshold as a proxy for COVID-related absences, the household may make a claim with their schools for any COVID-related absence that is less than 5 consecutive days,
      - the household will attest on a form provided by the school that the absence days are COVID-related, and the school will retain a record of the attestation, and
      - the school will verify that the absence days were excused prior to submitting those days to the state for benefit issuance,
- issue benefits in one of three tiers for each student based on the student's number of P-EBT eligible days:
  - o students with 1-5 P-EBT-eligible days will receive a benefit equal to 3 days of missed school meals,
  - o students with 6-15 P-EBT-eligible days will receive a benefit equal to 10 days of missed school meals, and
  - o students with 16 or more P-EBT-eligible days will receive a benefit equal to 17 days of missed school meals (174 instructional days divided by the 10 benefit months of September through June),
- tentatively issue benefits for the entire school year in August and September.

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.

Missouri estimates that it will issue \$83.5 million to approximately 335,000 children for school closures and reductions in attendance and hours extending from September 2021 through June 2022.

## 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 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 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 exceptional efforts to maintain children's access to nutritious meals, and understands that even as the nation recovers from this difficult time, State agencies and local program operators will still face any number of

challenges.	FNS st	ands re	ady to p	rovide a	dditional	support	as needed.	If you	have
questions, 1	please c	ontact t	he FNS	Mounta	in Plains	Regiona	l Office.		

Sincerely,

Cindy Long Administrator