



Food and Nutrition
Service

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November 15, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of North Carolina's State Plan for School Children,
School Year 2021-2022

TO: Willie Taylor
Regional Administrator
Southeast 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 North Carolina's enclosed plan to operate P-EBT for children in schools.

Summary of State's Plan

The North Carolina Department of Health and Human Services (NC DHHS) and the North Carolina Department 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 school children covers the months of September 2021 through May 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, North Carolina will:

- tentatively issue benefits for the months of September, October, November, and December in a single issuance by the end of January (or February, if necessary),

- issue benefits retrospectively on a monthly basis for the rest of the school year,
- use current free and reduced price eligibility lists to identify children potentially eligible for P-EBT:
 - North Carolina will not apply prior year free or reduced-price meal eligibility to the 2021-22 school year; schools collected school meal applications from all interested households at the beginning of the current school year in order to reset eligibility for free and reduced-price meals,
- calculate benefits for each student based on the student’s number of virtual learning days and COVID-related absences; the State will not calculate average benefits for any student, and
- provide guidance to schools detailing the requirements for:
 - determining school eligibility based on school closures or reductions in attendance and hours and
 - determining the number of benefit days for individual students using the quarantine and virtual instruction codes in the State’s recently updated Student Attendance and Student Accountability Handbook.

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.

- North Carolina estimates that it will issue \$153.4 million to approximately 248,000 children for school closures and reductions in attendance and hours extending from September 2021 through May 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 North Carolina. 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

North Carolina 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

North Carolina 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 NC DHHS 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 NC DHHS will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates North Carolina'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 stands ready to provide additional support as needed. If you have questions, please contact the FNS Southeast Regional Office.

Sincerely,

Cindy Long
Administrator