



Food and Nutrition  
Service

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April 28, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Nevada's State Plan for Children in Schools and Child Care

**TO:** Jesus Mendoza, Jr.  
Regional Administrator  
Western 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 Nevada's enclosed plan to operate P-EBT for children in schools and child care.

### **Summary of State's Plan**

The Nevada Division of Welfare and Supportive Services, Nevada Department of Agriculture, and the Nevada 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 for school children covers the months of August 2020 through June 2021. The State's plan for SNAP-enrolled children in child care covers the months of October 2020 through June 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, Nevada has or will:

- based on the timing of the P-EBT plan approval, issue P-EBT benefits from the beginning of the school year through November 2020 in June 2021; Nevada will issue benefits for December 2020 through February 2021 in July 2021; lastly, Nevada will issue benefits for March 2021 through the end of the school year in August 2021
  - Nevada will stagger issuances over a 10 day period in each benefit issuance month,
- collect data on student eligibility for free or reduced price meals from each NSLP-participating sponsor, including charter and BIE schools, in May,
- collect primary operating status and number of operating days for each school for each month of the school year through a survey of the State's 41 school authorities after plan approval,
- collected information from the State's school authorities in February and found that students in schools operating a hybrid schedule were on campus an average of 2.5 days per week; the State will use this to set an average hybrid benefit equal to half the number of each school's reported operating days,
- use the school-level operating status and operating days data to set benefits as follows:
  - eligible students in schools that were primarily closed (operating 100% virtually) in a month will receive a benefit equal to the daily P-EBT rate multiplied by the school's operating days for the month;
  - eligible students in schools that operated on a primarily hybrid basis for the month will receive a benefit equal to the daily P-EBT rate multiplied by half of the schools operating days (rounded up to the nearest whole number of days) for the month;
  - students in schools that were predominantly open for in-person instruction in a month will not be issued benefits for that month.

### **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, Nevada will:

- based on the timing of the P-EBT plan approval, Nevada will issue P-EBT benefits for the child care eligible children for the months of October and November 2020 in June 2021; Nevada will issue benefits for December 2020 through February 2021 in July 2021; lastly, Nevada will issue benefits for March 2021 through the end of the school year in August 2021,
  - Nevada will stagger issuances over a 10 day period in each benefit issuance month,
- identify the county of residence for each SNAP-enrolled child under age 6,

- for each month from October through the end of the school year, determine whether any school in the county has at least one school that is closed or offering only distance learning to its students; the State will use the ZIP code of the child’s residence to identify the predominate learning mode for the schools in that same ZIP code:
  - if the State identifies at least one school offering only virtual learning, all SNAP-enrolled children under age 6 will receive a P-EBT benefit in the same amount as the children in the school that has the greatest number of operating days in that month in the child’s ZIP code,
  - if the State does not identify at least one school offering only virtual learning, but identifies at least one school with a predominantly hybrid schedule, then all SNAP enrolled children under age 6 will receive a P-EBT benefit in the same amount as the children in the school that has the greatest number of operating days in that month in the child’s ZIP code that operates a hybrid schedule.

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.

- Nevada estimates that it will issue \$481.6 million to approximately 332,000 school children for school closures and reductions in attendance and hours extending from August 2020 through June 2021.
- Nevada estimates that it will issue \$41.8 million to approximately 63,000 SNAP-enrolled children in child care from October 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 Nevada. 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**

Nevada 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**

Nevada 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 Nevada Division of Welfare and Supportive 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 Nevada Division of Welfare and Supportive Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Nevada's commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Western Regional Office.

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs