



Food and Nutrition
Service

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May 27, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of New Hampshire's State Plan for School Children**

**TO: Christine Ruggieri
Acting Regional Administrator
Northeast 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 the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves New Hampshire's enclosed plan to operate P-EBT for school children.

Summary of State's Plan

The New Hampshire Department of Health and Human Services and the New Hampshire Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. The State's plan covers the months of September 2020 through June 2021.

Children are eligible 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 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, New Hampshire will:

- match DHHS's list of SNAP, TANF, and Medicaid recipients under 18 with the NSLP free and reduced price files for SY 19-20 and SY 20-21 maintained by DOE to confirm eligibility for P-EBT,

- match DHHS’s list of children that received P-EBT benefits for SY 19-20 with the NSLP free and reduced price files maintained by DOE to confirm eligibility for P-EBT,
- require households that did not receive P-EBT benefits during SY 19-20 and who are not participating in SNAP, TANF, or Medicaid to submit an application:
 - the application will collect the household information necessary to establish an EBT file,
 - children named on the applications will be matched with the NSLP free and reduced price files maintained by DOE in real time to confirm eligibility for P-EBT benefits,
 - if children on the application are not found on the DOE files, applicants may upload their “Notice of Eligibility Determination for Meal Benefits” issued by their school districts to confirm eligibility for P-EBT benefits,
 - applications that include a “Notice of Eligibility Determination for Meal Benefits” will be randomly sampled to confirm the accuracy of the uploaded document,
- collect operating status for each school for each month of the school year through a survey of schools in May or June,
- use the school-level operating status and operating days data to set benefits as follows:
 - eligible students in schools where a majority of students were fully remote (100% virtual) in a month will receive a fully virtual benefit;
 - eligible students in schools where a majority of students had a hybrid schedule for the month (part-time in-person) will receive an average hybrid benefit for the month;
 - students in schools where a majority of students were fully in-person in a month will not be issued benefits for that month.
- set a constant monthly benefit of 18 days for children with fully virtual schedules by averaging the number of instructional days across the number of months in the school year,
- established, through school-reported data on DOE-facilitated technical assistance reviews, that a 3 day per-week virtual schedule was the most common hybrid model; the state will use this to set an average hybrid benefit equal to 60% of the state’s fully virtual benefit,
- tentatively issue benefits for the months of September and October 30 days after plan approval to children that received P-EBT benefits during school year 2019-2020 or who are participating in SNAP, TANF, or Medicaid,
 - tentatively issue benefits for the months of November and December one week after the first issuance,
 - tentatively issue benefits for the months of January and February one week after the second issuance,
 - tentatively issue benefits for the months of March and April one week after the third issuance,
 - tentatively issue benefits for the rest of the school year retrospectively, on a monthly basis,

- tentatively issue benefits for the months of September through April to households that submitted a P-EBT application at the same time as the third issuance noted above,
 - tentatively issue benefits for the rest of the school year retrospectively, on a monthly basis.

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.

New Hampshire estimates that it will issue \$28.7 million to approximately 35,400 children for school closures and reductions in attendance and hours extending from September 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 New Hampshire. 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

New Hampshire 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

New Hampshire 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 New Hampshire Department of Health and 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 New Hampshire Department of Health and Human Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

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

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs