



Food and Nutrition
Service

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May 13, 2022

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

**TO: Bill Ludwig
Regional Administrator
Southwest 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 Oklahoma's enclosed plan to operate P-EBT for school children.

Summary of State's Plan

The Oklahoma Department of Human Services and the Oklahoma State 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 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, Oklahoma will:

- issue benefits on a rolling basis tentatively beginning 30 days after plan approval:

- issuance dates will depend on when monthly information from the schools is received and reviewed; there will not be a formal dated issuance timeline,
- use schools’ most current free and reduced price eligibility lists to identify students who may qualify for P-EBT benefits:
 - in cases where a student has newly become eligible for free or reduced price meals, use the date of application submission as the beginning of eligibility,
- use the state’s student attendance Reporting Platform, created last school year to support the state’s P-EBT program, to identify eligible children:
 - after plan approval, schools will begin reporting COVID-related absences and virtual learning days in the Reporting Platform; schools will begin by reporting data for all past months of the school year and will continue to report through the end of the school year,
 - schools will report the names of students with approved fully virtual schedules who attend NSLP eligible schools and sites, and the names of all other students with COVID-related absences or virtual learning days,
 - schools will provide the actual count of those days for each month,
 - all schools are believed to be tracking COVID related absences and virtual learning days in the Reporting Platform or are capable of reporting the equivalent elements to the state outside of the Reporting Platform:
 - if, however, there are any schools have not been tracking COVID-related absences, those schools will instead report any excused absence of 5 consecutive days or more as a P-EBT-eligible absence:
 - for families attending schools using the 5 consecutive day threshold as a proxy for a COVID-related absence, the family may make a claim with the state through its reconsideration process for any COVID-related absence that is less than 5 consecutive days,
 - the family will attest that the absence days are COVID-related and the state will retain a record of the parent or guardian’s attestation, and
 - the state will verify with the school that the absences were excused prior to issuing benefits for those days,
- calculate benefits for each student based on the school-reported number of virtual learning days and COVID-related absences for each student as described above; the state will not calculate average benefits for any student,
- students will receive P-EBT benefits for absences due to school closures (if any), quarantines, other absences due to COVID related illness, and approved virtual learning days for COVID related reasons.

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.

- Oklahoma estimates that it will issue \$25 million to approximately 63,900 children for school closures and reductions in attendance and hours extending from August 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 Oklahoma. 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

Oklahoma 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

Oklahoma 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 Oklahoma Department of 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 Oklahoma Department of 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 Oklahoma'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 Southwest Regional Office.

Sincerely,

Cindy Long
Administrator