

**P-EBT Q&A – November 16, 2020**

**P-EBT Assistance for Children in Schools that are Closed or have Reduced Attendance**

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<b>Summary:</b>	(1) This document provides information to States to assist in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
<b>Disclaimer:</b>	<b>The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.</b>

***Additional context and background for this document can be found at:***

***<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>***

## P-EBT Q&A – November 16, 2020

### P-EBT Assistance for Children in Schools that are Closed or have Reduced Attendance

**1. Will USDA approve P-EBT plan amendments for School Year (SY) 2019-2020?**

No, USDA will not approve amendments to previously approved plans for SY 2019-2020.

**2. Can States issue benefits to school children who were covered by their approved P-EBT plans but were missed or issued too small a benefit due to State error?**

Yes, States with approved P-EBT plans for SY 2019-2020 or the beginning of SY 2020-2021 can issue new or corrected P-EBT benefits to children who were covered by the States' approved plans but did not receive benefits or received too small a benefit due to State error.

**3. Can States that were not previously approved to issue P-EBT benefits for school children for the beginning of SY 2020-2021 include that time period in their SY 2020-2021 plans?**

Yes, States that were not previously approved to issue benefits for the beginning of SY 2020-2021 may include those months (generally August and September) in their SY 2020-2021 plans.

**4. What standard applies for determining and issuing benefits for SY 2020-2021?**

The standard for SY 2020-2021 is the one reflected in current law, as modified by the October 1 "Continuing Appropriations Act, 2021 and Other Extensions Act," which allows for the use of "simplifying assumptions." States that were not previously approved to issue benefits for the beginning of SY 2020-2021 should apply the same standard for all months of SY 2020-2021 when developing their P-EBT plans. States that have already issued benefits for the beginning of SY 2020-2021 have the option of amending their plans.

**5. What are the P-EBT eligibility criteria for school children in SY 2020-2021?**

A school child is eligible for P-EBT benefits if two conditions are met:

- i. The child would have received free or reduced price school meals under the NSLP and SBP if not for the COVID health emergency. This includes children who are directly certified or certified by application. It also includes children enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, and

- ii. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year.

**6. Are States required to make new income eligibility determinations for school children for SY 2020-21?**

States must use the best available data to determine whether students are eligible for free or reduced-price meals, and therefore eligible for P-EBT. Many school districts are providing school meals through the Summer Food Service Program (SFSP) in SY 2020-2021 rather than through the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). These school districts may not have collected school meal applications at the start of the school year. In this case, the State may issue P-EBT benefits based on free and reduced-price eligibility data from SY 2019-2020. However, States and/or school districts using last year's eligibility data must ensure that they do not issue P-EBT benefits to students who graduated or are no longer enrolled in school. In addition, States must provide an opportunity for children who were not income eligible in SY 2019-2020 to establish their eligibility in the current school year. Similarly, States must certify eligible children who are newly enrolled in school (kindergarten, transfers, etc.). USDA strongly encourages States and school districts to use their established application processes and direct certification systems to determine these children's eligibility.

**7. Are children who attend school in-person and receive meals at their schools eligible for P-EBT if their schools are operating with reduced attendance or reduced hours?**

In general, students are not eligible for P-EBT on days that they attend school in person and receive meals at school. They may be eligible on days that they do not attend school in person or attend school in person but do not receive a meal at school.

**8. May children who are enrolled in schools that provide meals through the SFSP rather than the NSLP and SBP receive P-EBT benefits?**

Yes, children enrolled in schools that are closed or have reduced attendance for at least 5 consecutive days and that provide meals to students through the SFSP instead of the NSLP and SBP may be eligible for P-EBT. These children are eligible if they would have received free or reduced-price meals under the NSLP and SBP but for the school's closure or reduced attendance.

**9. Since all children are eligible for free meals in schools that provide meals through the SFSP, are all of these children eligible for P-EBT on days that they do not attend school?**

No. Children must be eligible for free or reduced-price meals under the eligibility criteria for the NSLP and SBP, or attend a school participating in Provision 2, Provision 3, or the Community Eligibility Provision in order to receive P-EBT benefits.

**10. Are children who are no longer enrolled in school and are being homeschooled because of COVID-19 eligible to receive P-EBT?**

No. Children who are no longer enrolled in an NSLP/SBP-participating school and are being homeschooled are not eligible to receive P-EBT for SY 2020-2021.

**11. Can States calculate an average P-EBT benefit for eligible children who attend school in-person on some days and virtually on other days?**

Yes, States may calculate an average monthly benefit, using the “best feasibly available data,” as provided by statute, for children in schools in which children attend in-person on some days and virtually on other days. However, under the Families First Coronavirus Response Act, States cannot issue P-EBT benefits to children who attend in-person every day and receive meals at school. Additionally, children who attend school virtually full-time must receive a P-EBT benefit consistent with their full-time virtual status.

**12. For what days may States issue P-EBT benefits?**

Benefits may be issued for weekdays during the regular school year. Benefits may not be issued for school breaks or holidays.

**13. Must a child’s school be closed or operating at reduced attendance or hours for a minimum of 5 consecutive days in the current school year for the child to be eligible for P-EBT benefits?**

Yes, the period of closure or reduced attendance or hours must meet the minimum 5 consecutive day threshold this school year before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

**14. How frequently must States reassess the operating status of schools to determine if children remain eligible for P-EBT and to determine benefit amounts?**

In order to ensure program integrity, prospective calculation of benefits is limited to two months. States must determine P-EBT benefit levels based on a reassessment of school operating status, and the impact of any such change on children’s access to meals at school, no less frequently than at the end of each two month period. However, States have a responsibility to monitor changes in operating status and make necessary adjustments to prevent the improper payment of benefits. For example, if the State becomes aware that a school district will switch from virtual to in-person instruction after the State issued the first month’s benefits but before it issues the second month’s benefits, the State must make corrections prior to issuing the second month’s benefits.

States also have discretion to reassess eligibility more frequently than monthly or to only issue benefits retrospectively.

**15. Can a State issue replacement P-EBT cards if they were lost or misplaced?**

States may issue replacement P-EBT cards, but cannot replace the value of any benefits which have already been redeemed.

**16. How will P-EBT be administered in the U.S. territories?**

The basic guidance included in this Q&A and template applies. However, due to operational differences, USDA will work directly with the territories to meet requirements and administer benefits.

## **Administrative Funding**

**17. How will USDA administer administrative funding? Can it be claimed retroactively to FY 2020? Can multiple State agencies access these funds?**

USDA will provide a new grant award to each State's SNAP State agency for P-EBT-related administrative costs. The period of performance for this award will be October 1, 2020, through September 30, 2021. The grant will be available for the necessary, allowable, and reasonable State agency costs associated with the administration of P-EBT incurred during FY 2021. This includes administrative costs associated with the issuance of retroactive FY 2020 benefits incurred in FY 2021. It is expected that the SNAP State agency will work with other impacted State agencies to make this funding available through sub-award or reimbursement as provided for under State procedures.

**18. What administrative costs may States claim for reimbursement?**

The grant will be available for the necessary, allowable, and reasonable State agency costs associated with the administration of P-EBT incurred during FY 2021. This includes administrative costs associated with the issuance of retroactive FY 2020 benefits incurred in FY 2021. The award will follow general Government-wide grant rules under 2 CFR unless otherwise provided for in the terms and conditions which will accompany the award.

**19. What must the States report to USDA? When must they report?**

States will be expected to submit a P-EBT administrative cost plan for the intended period of operations for USDA approval using the FNS-366a. The approved level of this plan will serve as a limit on State expenditures. Should costs be higher than expected, a State may amend their plan and seek USDA approval for a higher level of administrative

funding. During the period of performance of the grant, the SNAP State agency will be expected to aggregate obligation and outlay data from all State agencies utilizing the award and report quarterly to USDA using a P-EBT specific instance of the FNS-778. Further guidance on the use of the FNS-366a and the FNS-778, including specific reporting timeframes, will be included in the terms and conditions to accompany the award.