



Food and Nutrition  
Service

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January 27, 2022

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

**TO:** Lizbeth Silbermann  
Regional Administrator  
Northeast 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 Rhode Island's enclosed plan to operate P-EBT for school children.

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

The Rhode Island Department of Human Services and the Rhode Island 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 September 2021 through June 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, Rhode Island will:

- tentatively issue benefits for eligible children in public schools for the months of September through November in 3 separate issuances on a weekly basis in February, and for eligible children in private schools in 3 separate issuances on a weekly basis in March,

- tentatively issue benefits for December for eligible children in public schools in early March and for eligible children in private schools in late March,
- tentatively issue benefits for January for eligible children in both public and private schools in early April,
- issue benefits for the rest of the school year retrospectively on a monthly basis,
- use schools' most current free and reduced price eligibility lists to identify students who may qualify for P-EBT benefits:
  - newly income-eligible students will be eligible for benefits from the date their free and reduced price meal application was received and forward,
- collect monthly attendance data from public, charter and private schools and provide benefits consistent with the number of COVID-related absences and/or fully virtual learning days:
  - students in a fully virtual learning mode will receive a monthly benefit consistent with the number of instructional days that month,
  - students in a hybrid learning mode will receive a monthly benefit consistent with the number of actual number of virtual learning days that month,
  - students in an in-person learning mode who have a COVID-related absence or need to quarantine will receive a benefit consistent with their actual count of COVID-absence or virtual learning days for that month, and
- provide guidance to schools detailing the requirements that schools will use for:
  - determining school eligibility based on school closures or reductions in attendance and hours,
  - determining what is a COVID-related absence, and
  - determining the number of benefit days for individual students.

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.

- Rhode Island estimates that it will issue \$3.6 million to approximately 11,100 children for school closures and reductions in attendance and hours extending from September 2021 through June 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 Rhode Island. 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**

Rhode Island 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**

Rhode Island 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 Rhode Island 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 Rhode Island 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 Rhode Island’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 Northeast Regional Office.

Sincerely,

Cindy Long  
Administrator