



Food and Nutrition
Service

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January 17, 2023

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Rhode Island's State Plan for Children in Schools
and Child Care, School Year 2022-2023

TO: Christine Ruggieri
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 children in schools and child care.

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 covers the months of September 2022 through June 2023.

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 facilities.

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 eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2021-2022 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. The state will also provide a path for households with eligible homeschooled children and children in fully virtual schools to receive benefits; these children may be eligible if they began homeschooling or enrolled in fully virtual school due to concerns about the COVID health emergency.

In addition, Rhode Island has or will:

(for children currently enrolled in NSLP-participating schools)

- communicate the P-EBT eligibility requirements to its school districts; these include eligibility for free or reduced price meals and lack of access to meals at school due to a school-approved COVID-related reason,
- collect monthly attendance data from each NSLP-participating school district; this includes a count of each eligible child's COVID-related absences and virtual learning days:
 - all schools continue to track COVID-related absences and virtual learning days,
 - the state will use this information to issue student-specific P-EBT benefits to each eligible child,
 - the state will not use any simplifying assumptions to issue P-EBT benefits,
 - a small number of free and reduced price eligible students in NSLP-participating schools are approved for full-time virtual instruction; these children will receive benefits for each instructional day,
- issue benefits for the months of September through November in three separate installments in February,
- issue benefits for December in March,
- issue benefits for the remaining months of the school year in the second week of the month following the benefit month.

(for eligible children attending non-NSLP virtual schools and eligible homeschooled children)

- issue a press release and put information in the state's P-EBT website:
 - the state's public information campaign will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children,
- direct households of potentially eligible children to complete a P-EBT application on the state's website:
 - the application will include a section equivalent to a school year 2022-2023 free and reduced price meal application:
 - applicants will provide documentation to support the application's income sources at the time of application,
 - applicants will indicate the reason why they unenrolled their children from their NSLP school district in order to begin homeschooling or to enroll in a fully virtual school:
 - for children who began school in Rhode Island after the start of the pandemic and never attended (did not "unenroll" from) an NSLP-participating school, applicants will indicate the reason

why they chose to enroll their children in homeschool or in a fully virtual school,

- applicants whose children unenrolled from an NSLP-participating school after the start of the pandemic will submit the application to their children’s former school for verification and signatures, then send the application and supporting documentation to the state’s EBT Coordinator,
- applicants whose children began school in Rhode Island after the start of the pandemic and have always been homeschooled or enrolled in virtual school will send the application and supporting documentation directly to the state’s EBT Coordinator,
- the state will review the application and confirm that the child is eligible for P-EBT benefits; this includes confirmation of the child’s eligibility for free or reduced price school meals:
 - for children who are not categorically eligible for free meals and would not have attended a CEP or Provision 2 school if not for COVID, the state will use the income documentation provided by applicants to verify their income eligibility as follows:
 - the state will confirm that the documentation matches the income entered on the application for **at least** the first 100 applications received,
 - if the error rate on the first 100 applications is below 5 percent, the state will verify 10 percent of remaining applications; if the error rate is higher, the state will continue to verify all applications,
- issue benefits as applications are approved:
 - the state will issue benefits to approved applicants on the next scheduled issuance date for children attending NSLP-participating schools.
- Inform FNS of any changes to the timelines.

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 \$272,000 to approximately 8,300 school children for school closures and reductions in attendance and hours extending from September 2022 through June 2023.

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 by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

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 values Rhode Island’s partnership in the administration of Pandemic EBT. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Northeast Regional Office.

Sincerely,

Cindy Long
Administrator