



Food and Nutrition  
Service

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May 17, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Minnesota's State Plan for Children in Child Care**

**TO: Vista Fletcher  
Regional Administrator  
Midwest 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 a temporary assistance program for households with 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 Minnesota's enclosed plan to operate P-EBT for children in child care.

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

The Minnesota Department of Human Services and the Minnesota 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 SNAP-enrolled children in child care covers the months of October 2020 through June 2021.

Children in child care are eligible for benefits 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 covered child care facility.

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the State will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Minnesota has or will:

- confirm for each month from October through the end of the school year, that each county has at least one school that is operating fully virtually or using a hybrid model or is contiguous to a county with at least one school that is operating fully virtually or using a hybrid model,

- issue P-EBT benefits to all SNAP-enrolled children under age 6 statewide equal to the 11 day hybrid benefit provided to school age children. (as adjusted, after reviewing a sample of hybrid school schedules in April and June):
  - confirms that the average hybrid benefit for school children is a reasonable reflection of the typical P-EBT benefit issued to school children who attend schools in the area of the P-EBT child care beneficiary,
- issue benefits for the months of October through February in a single issuance in May,
- issue benefits for the months of March and April in June in a single issuance,
- issue benefits for the months of May and June in July in a single issuance.

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.

Minnesota estimates that it will issue \$60 million to approximately 100,000 SNAP-enrolled children in child care from October 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 Minnesota. 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**

Minnesota 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**

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

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs