



Food and Nutrition  
Service

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January 28, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Tennessee's State Plan for School Children**

**TO:** Willie Taylor  
Regional Administrator  
Southeast 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) authorized the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Tennessee's enclosed plan to operate P-EBT for school children.

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

The Tennessee Department of Human Services and the Tennessee Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. The State's plan covers the months of October 2020 through June 2021.

Children are eligible 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. The State will issue benefits only to households with children whose schools are closed or have reduced the number of days or hours that students attend the school for at least 5 consecutive days.

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 SY 2019-2020 eligibility data will exclude last year's graduates and 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, Tennessee has or will:

- issue benefits for the months of October and November in a single issuance by February 20,
- issue benefits for the months of December through February retrospectively on a monthly basis by the 20<sup>th</sup> of each month;
- issue benefits for the months of April, May, and June in a single issuance by July 20.

- reviewed school district schedule data at the time of plan submission and determined that an 7.5-day average benefit is a reasonable reflection of hybrid schedules across the state for October and November,
- collect schedule data from school districts no less frequently than every other month for the remainder of the school year,
- use this school-level schedule data to set or adjust average benefits for each remaining two-month period in the school year for children with hybrid schedules; if justified by the data, the state will set a single statewide average benefit for these children, and
- set a constant monthly benefit equivalent to 18 days for children with fully virtual schedules by averaging the number of instructional days by the number of months in the school year.

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 free breakfast and lunch multiplied by the number of benefit days calculated as described in the State's plan.

Tennessee estimates that it will issue \$ 645.5 million to approximately 765,000 children for school closures and reductions in attendance and hours extending 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 Tennessee. 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**

Tennessee 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**

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

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs