



Food and Nutrition
Service

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January 27, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Vermont'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 Vermont's enclosed plan to operate P-EBT for school children.

Summary of State's Plan

The Vermont Agency of Human Services, Department for Children and Families, Economic Services Division and the Vermont Agency 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, Vermont will:

- tentatively issue benefits for the months of September through January in one issuance,
- tentatively issue benefits for the months of February through June in one issuance,

- determine an issuance schedule after plan approval that will be posted on the State’s P-EBT website and messaged to households and the public,
- use schools’ most current free and reduced-price eligibility lists to identify students who may qualify for P-EBT benefits,
- instruct schools that students are only eligible for P-EBT once the school has been closed or had reduced attendance for five consecutive days or more,
- identify children with at least one absence due to COVID occurring after the school has been determined eligible to administer P-EBT,
- determine the weighted average monthly length of COVID-related absences for the fall semester months using a sample of schools (weighted by enrollment) to develop a single average monthly benefit:
 - issue the average monthly benefit to all children with at least one absence due to COVID in the month,
 - update its average benefit with new data from its sample of school districts at least every two months in the spring semester,
- provide a process for households that believe they are eligible but did not receive benefits to report their eligibility; the state and schools will confirm eligibility before issuing benefits,
- provide a fair hearing for households with any concerns about their P-EBT benefits.

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.

Vermont estimates that it will issue \$4.1 million to approximately 7,200 children per month 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 Vermont. 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

Vermont 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

Vermont 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 Vermont Agency of Human Services, Department for Children and Families, Economic Services Division 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 Vermont Agency of Human Services, Department for Children and Families, Economic Services Division will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Vermont'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