

## MEMORANDUM

TO: Superintendents, Administrators, Determining Officials, Food Service  
FROM: Rosie Krueger, State Director of Child Nutrition Programs  
SUBJECT: Preliminary Guidance on P-EBT for SY 20-21  
DATE: January 19, 2021

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### Purpose

This memo previews work that school food authorities (SFAs) will need to complete over the next several months in order to implement Pandemic Electronic Benefit Transfer (P-EBT) for School Year 20-21. While Vermont's P-EBT implementation plan has just been approved by USDA, the Agency of Education (AOE) and Department for Children and Families (DCF) are still finalizing some aspects of the process and will likely not be ready to begin collecting data until late February. In the meantime, this memo provides an update for SFAs as to what we currently expect the process will look like to allow for adequate planning. In addition, the end of the memo details several recommendations for actions that SFAs can take now to streamline work later.

The AOE recognizes that implementation of these benefits requires significant effort from SFA staff. We are committed to providing as much support as possible to assist with this process. We are currently exploring funding options to assist SFAs with additional costs associated with this process. In addition, we will be providing materials and templates for communication with households, and AOE and our partners at DCF will be providing dedicated staff support for questions from schools and households.

### Background

In Spring 2020, the State of Vermont was able to issue \$14 million in P-EBT benefits to households with children who would have been eligible for free or reduced price school meals under the National School Lunch Act, if not for the COVID-19 related school closures. P-EBT benefits are funds provided on an electronic benefit transfer card that a household may use to purchase food items at grocery stores, convenience stores, online retailers and farmers markets where 3SquaresVT (SNAP) benefits are accepted.

These funds were originally provided by the federal government under the Families First Coronavirus Response Act of 2020. In Fall 2020, Congress extended P-EBT benefits for the entire 2020-21 school year. USDA, the federal agency responsible for implementing the benefits, did not issue guidance to state agencies on implementation until mid-November. USDA must

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### Contact Information:

If you have questions about this document or would like additional information, please contact: Rosie Krueger, State Director of Child Nutrition Programs, at [mary.krueger@vermont.gov](mailto:mary.krueger@vermont.gov) or (802) 828-1589.

review and approve each state's implementation plan prior to the state starting to issue benefits. Vermont's plan was approved on Jan. 15, 2021.

We estimate that this program will distribute \$29.6 million in P-EBT benefits to Vermont households for School Year 2020-21.

## **Eligibility for P-EBT Benefits**

Eligibility for P-EBT benefits this school year is more complicated than in Spring 2020, and not all children who received benefits in the Spring will be eligible for School Year 2020-21 benefits. P-EBT benefits are meant to replace the value of meals that students would have received for free had they attended school in-person. That means in order to qualify, children must meet two criteria:

- They must be eligible for free and reduced meals or attend a school that normally offers universal meals, such as schools participating in the Community Eligibility Provision (CEP) or Provision 2.
- They must not have access to meals at school on some or all school days because they are learning in a 100% remote or hybrid learning modality.

For more on these criteria, see below.

### **Hybrid or 100% Remote Learning Modality Requirement**

In Spring 2020, all schools in Vermont were closed and no children were receiving meals at school. As a result, all children who normally received meals for free at school were eligible for the full P-EBT benefit. However, in School Year 2020-21, Vermont schools have had a wide variety of attendance models, often changing over the course of the year.

**USDA has determined that children who are attending school 100% in person (defined as attending school five (5) days per week) are not eligible for P-EBT.** Children who are learning 100% remotely and are eligible for free and reduced meals, or who attend a CEP or Provision 2 school and are learning 100% remotely, are eligible for the full P-EBT benefit of \$102.55 per month. Children who are attending school in a hybrid model (not attending school in-person at least one (1) day per week) will be eligible for a partial benefit.

For the purposes of P-EBT, the child's learning modality will be determined on a monthly basis depending on the modality that the child was in for the majority of the month's instructional days. For example, if a child was attending school 100% in-person for the first 9 instructional days of the month, then the school was closed for in-person learning for the remaining 11 instructional days of the month, that child would be considered "100% remote" for that month.

The fact that a school offers meals for remote learners (through delivery, pick-up or sending meals home with children) has no impact on eligibility for P-EBT. USDA's assumption is that if a child is not attending school in person every day, it is more difficult to receive meals, therefore the child is still eligible for P-EBT even if they are accessing the meals made available for remote learners.

## Free and Reduced Meal Eligibility Requirement

The second requirement for P-EBT eligibility is that a child normally would have received free meals at school. This means that the child either needs to be eligible for free or reduced meals or attend a school that normally offers Universal Meals through CEP, Provision 2 or a non-pricing program. Providing free meals this year through the SFSP does not automatically qualify all students at the school for P-EBT.

Because of the unique circumstances this year, the normal “30 day carryover period” of prior year meal eligibility has not yet begun to elapse for schools participating in the SFSP. This means that if a child was eligible for free or reduced meals last school year, they maintain their eligibility this year. There is no need to collect new applications for households who were eligible for free and reduced meals last school year. If households did submit new applications, then the applications should be processed, and the most recent eligibility information should be used.

Because all meals were offered for free this year using the SFSP, many newly income eligible households and newly enrolled students likely did not submit applications for free and reduced meals this school year. USDA is allowing households who have not yet submitted applications to submit applications now through April 1, 2021, to qualify for P-EBT benefits retroactive to September. For applications received after April 1, 2021, households would only qualify for benefits moving forward.

## Anticipated Process

The SFA (SU/SD for Public Schools) will be responsible for determining children’s eligibility for the full or partial benefit for each month, based on criteria provided by AOE. AOE does not maintain data about individual student learning modalities and does not maintain up-to-date information on student eligibility status, so this will need to be determined and provided by each SFA.

SFAs will also need to collect certain contact information for each eligible household needed by DCF to issue the benefit cards. This will be similar to the information that was needed in Spring 2020, including head of household name and mailing address and the student’s date of birth. DCF will provide a template spreadsheet for submitting the required information.

SFAs will transmit this spreadsheet directly to DCF, using a portal that DCF is setting up specifically for this purpose. This is a change from the Spring 2020 process. This time around, the information will not be funneled through the AOE. DCF intends to have their portal be simple enough to use that school determining officials will be able to upload lists of eligible students easily, without needing to rely on data managers to submit the information. **Monthly eligibility for September-December will be requested at one time, likely in late February.** After that, monthly information will be requested 15 days after the end of each month.

DCF will issue benefits to households after receiving the information from schools. **September – December benefits are planned to be issued in mid-March.** Households who are already receiving 3SquaresVT will have the benefit added to their existing cards. All other households will receive a new P-EBT card in the mail. P-EBT cards issued last spring will not be used again,

as households likely didn't retain these cards. Households should keep their new 2020-21 school year P-EBT cards as there will be more than one benefit issuance this school year. January-March benefits will be issued at the end of April, and April-June benefits will be issued at the end of July.

In Spring 2020, we learned that communication was a major area for improvement. DCF will be operating a P-EBT specific helpline for households to contact with concerns. In addition, AOE Child Nutrition Programs will facilitate communication between DCF and schools when specific cases need to be researched. AOE will also provide template language that SFAs may use to communicate with households to reduce the communication burden on individual school staff.

### **Suggested Steps to Take Now**

- **Superintendents** should determine who will be responsible for managing this process. This will be a significant amount of work to manage over the next six weeks, and there will be ongoing monthly work required through mid-July. If the SFA has one determining official who processes and manages all free and reduced meal applications, that is likely the best person to take on this work. If application processing is dispersed throughout the SFA, then one person in the SU/SD office will need to be appointed. The person assigned to this work will need authority to access information on student eligibility, direct certification information and information on student learning modalities.
- **Determining officials** should review current free and reduced eligibility documentation to make sure it is in order and ask the data manager for the most recent direct certification information from edFusion.
- **Determining officials** should get ready to process more free and reduced meal applications over the coming weeks. Review [recorded training on processing applications](#) if a refresher is needed.
- **The individual responsible for managing P-EBT** should get ready to communicate to households. AOE will be providing a template letter later this week that you can use to tell households about the benefit, advise them of their current eligibility status, encourage them to submit a new application if necessary, and ask them to review the current information that you have on file for head of household and mailing address.
- **The individual responsible for managing P-EBT** should determine how student learning modality is tracked at their school(s), and which individuals will need to be involved in gathering this information.