

Frequently Asked Questions About Pandemic EBT (P-EBT) 2021-2022 School Year

Revised February 28, 2022

These frequently asked questions provide answers for school personnel on how to manage the P-EBT implementation. For basic questions on what P-EBT is, and how households will receive the benefit, please see [FAQs About Pandemic EBT](#) for Households. For more information about the process that schools are expected to follow, please see the AOE's [P-EBT for Schools](#) page and [Instructions for Determining Eligibility for P-EBT in SY 21-22](#).

Questions about Requirement 1:

School Building Closed or at Reduced Attendance for Five (5) Consecutive Days

Q1: None of our school buildings were closed for 5 consecutive days this year. Does this mean that we do not meet Requirement 1, and none of our students are eligible?

No. There are several ways to meet Requirement 1. Requirement 1 is also met when the school has reduced attendance of 5 days or more, which is defined as having one or more students absent for 5 consecutive days due to a COVID-19-related reason. It does not need to be the same student absent all 5 days. Most Vermont schools will have met Requirement 1 through this method in September 2021.

Q2: Does the same student need to be absent for 5 consecutive days to qualify as reduced attendance for Requirement 1, or could it be different students on different days?

Different students could be absent on different days during the 5-day period. It does not need to be the same student absent, as long as all of the absences being used are because of a COVID-19-related reason.

Q3: Are weekend days or holidays included in the 5 consecutive day period?

The period is 5 consecutive school days, but it can be broken up by a weekend and/or holiday. For example, if you had students out for COVID-19-related reasons on Wednesday, Thursday, Friday, and the following Monday and Tuesday, that would be considered 5 consecutive days. If Monday was the Labor Day holiday, then students would also need to be absent on Wednesday for it to count as 5 consecutive days.

Q4: Can the 5-day period start in August 2021?

Yes. We will not be issuing benefits for the month of August 2021 this round because they were included in the Summer 2021 issuance. However, for the purposes of Requirement 1, you should look back to the start of the school year. For some schools, that may mean that 5-day

period of reduced attendance started in August and carried into September. In that case, the building would meet Eligibility Criteria 1 starting September 1.

Q5: When determining reduced attendance for Requirement 1, should we only look at students who were absent because they were quarantining or who tested positive for COVID-19, or can we look at other COVID-19-related absences?

Page 4 of the [Instructions for Determining Eligibility for P-EBT in SY21-22](#) has a list of types of excused absences that would be considered COVID-19-related. You should include any of these types of absences in determining when your school had reduced attendance for 5-days or more for a COVID-19-related reason.

Q6: Our schools have met Requirement 1. Does that mean that all of our students are eligible for P-EBT every month?

No. Once the school has met Requirement 1, individual students need to meet Requirements 2 and 3 in order to be eligible for the benefit that month.

Q7: Does the school building need to re-qualify for Requirement 1 every month?

No. The building just needs to qualify under Requirement 1 once, and then it has met that requirement for the rest of the year. For most Vermont schools, this will have happened in September 2021.

Questions about Requirement 2: Eligible for Free/Reduced Meals or Attending CEP/Provision 2 Lunch School

Q8: Our school is CEP or Provision 2 for Lunch. We met Requirement 1 (reduced attendance) in September and had a COVID-19-related closure later in the year. Does that mean that every single one of our students is eligible for P-EBT during the month we had the closure? Not all of these students have an economic need for the benefit.

Yes. All students in CEP or Provision 2 Lunch schools meet Requirement 2. As long as the building has met Requirement 1, then all students would be eligible for P-EBT in any month there is a closure.

The benefit is meant to replace the value of the free meals that students would have received at school if not for COVID-19. At CEP/Provision 2 schools, all students normally receive free meals, so everyone would qualify for the benefit if Requirements 1 and 3 are met, regardless of the household's economic need.

Questions about Requirement 3: COVID-19-Related Closure or Absence

Q9: We had a school closure that would make our students eligible for P-EBT that month. We might make up the closure days at the end of the year, or we might request a waiver to not make up those days. Does that impact whether the closure qualifies students for P-EBT?

No. Any COVID-19-related closures will mean your students meet Requirement 3 for that month, regardless of whether the days are made up and regardless of the status of your waiver request.

Q10: Our school hasn't tracked all of the different types of COVID-19-related absences listed in the [Instructions for Determining Eligibility for P-EBT in SY21-22](#). How should we proceed?

Schools should report the best available information they have. Students should only be reported as eligible under Requirement 3 if the school knows that they had an excused COVID-19-related absence, or there was a COVID-19-related school closure. If the school knows that the absence was excused, but does not know if it was COVID-19-related, they should not report the student as eligible. If the school does not consider the absence to be excused, they should not report the student as eligible.

Q11: If we had a COVID-19-related closure impacting all our students, do we need to look for COVID-19-related absences that month for Requirement 3?

No. The closure means the students met Requirement 3 for that month – there is no need to look further for additional COVID-19-related absences for that month. This is why we suggest first looking for closures, and then only looking for absences if there was no closure.

Q12: We had a weather-related closure. Does that qualify our students for that month for Requirement 3?

No. Only COVID-19-related closures or absences qualify students under Requirement 3.

Other New/Updated Questions for SY 21-22

Q13: What is the timeline for this process?

February 7- 18, 2022: School Food Authorities send out template letters to households.

March 15, 2022: Deadline for School Food Authorities to submit data to AOE for September 2021-January 2022.

Late April 2022: DCF will issue benefits to households for September 2021-January 2022.

June 2022: AOE will request info for February – June 2022, and Summer 2022.

July/August 2022: DCF will issue benefits to households for February – June 2022 and Summer 2022.

August 2022: AOE will request info for the small group of students newly eligible during Summer 2022.

September 2022: DCF will issue final Summer 2022 benefits.

Q14: Can we change the date that households need to respond to give them more time?

As long as you will have all of the data you need in your template and ready to submit to AOE by March 15, 2022, you can change the date in the template letter to households to give them more time.

Q15: Will there be Summer 2022 P-EBT benefits? When will that data be collected?

Yes, Vermont qualifies to offer P-EBT benefits for students in Summer 2022 because we have an approved P-EBT plan for SY21-22. We have not yet received guidance from USDA on the Summer 2022 plan. We expect it to be very similar to Summer 2021. In that case, all students eligible for free and reduced meals, or attending a CEP/Provision 2 Lunch school, as of June 2022, would receive a fixed benefit for the entire summer. The benefit amount will be determined by USDA.

We expect to combine the Summer 2022 data collection with the February-June data collection, which will be due in late June. In addition, there will likely be a small data collection in August 2022 for any students who became eligible for free and reduced meals over the summer – identical to the collection conducted in August 2021.

Q16: Will there be funding to help with the administrative costs associated with P-EBT?

Yes, USDA is expecting to provide P-EBT administrative funds for schools for SY21-22, similar to the funds provided for SY20-21. We expect USDA to offer the same options as last time. The first option was to receive a nominal amount of funding based on enrollment, with no back-up documentation required. The second option was to request the exact amount spent (no limit). This option required the SFA to maintain backup documentation for the COVID-19-related expenses. We do not yet know when these funds will be available.

Q17: Can our school opt-out of offering P-EBT?

No. This benefit must be offered to all students who are eligible. If your school normally participates in the National School Lunch Program and meets Requirement 1, you must report any students who meet Requirement 2 and 3 for any months they are eligible.

FAQs from SY20-21 Still Applicable in SY21-22

Q18: Should we send the customized letter to every household in our school district?

Yes, we are asking you to send this to every household for three reasons. First, we want to give households basic information about what to expect. Second, we want to give everyone who doesn't currently qualify based on last year or this year a chance to submit an application. Third, we learned from the Spring 2020 implementation that there were a lot of issues with incorrect Head of Household and mailing addresses, so we want to give households a chance to correct that prior to the cards being sent out.

It is a lot of work up front, but it will save you a lot of work processing unnecessary applications and fielding calls from parents who want to know where their cards are after they are missent.

To simplify the process of customizing the letters, we recommend setting up two mail merges. One for households who are already eligible, and one for households who need to submit applications. If you take the time to set up the mail merge, the customization should go fairly quickly. There is likely someone already experienced in setting up mail merges among your administrative staff. If not, see these [instructions on how to set up a mail merge in Microsoft Word](#).

Q19. Can we email the letter to households or does it have to be sent via postal mail?

The letters may be sent electronically as long as you have emails for all of the households (or will send paper copies to those you don't have emails for), and you are abiding by your district's policies on how to safely email confidential student information.

Q20: Can we send a link to our electronic free and reduced meal application, or do we need to send paper copies of the application?

As long as you provide information to households on how to access a paper application (your electronic application should already do this), you may send a link to your electronic application and do not need to send a paper copy of the application.

Q21: We are a small school. Can we call households to verify information instead of sending them the letter?

Yes. However, the letter contains background information about P-EBT that may be difficult to convey over the phone. If you choose to call households to verify information and let them know their status, we suggest sending a generic version of the letter and FAQ for households as well.

Q22: How do we handle households with 50/50 split custody? Who should be listed as the Head of Household?

DCF needs to know who to mail the card to so that the child will benefit from the funds. It is up to the school to determine who this should be. This is one of the reasons for sending the customized letter to the households to confirm where they want their benefit sent. If there is a dispute about which parent/guardian should be listed as the Head of Household, the school could use the following factors to make the determination:

- Which parent/guardian completed the application for free and reduced-price meals?
- Which parent/guardian is listed first as the emergency contact in your system for that student?

In the event that the households disagree, you could ask them which parent/guardian will be claiming the child as a dependent on their taxes this year. That is likely something stipulated in the child's custody agreement.

Ultimately, it is up to the school to make the decision in the fairest way you can.

Q23: We have some students who attend our school who live in other states. Are they eligible for this benefit?

Yes, if the student is attending a Vermont school, Vermont will issue the P-EBT benefits, regardless of the child's state of residence.

Q24: Who should we list as Head of Household for State-placed foster students?

List the foster parent and mailing address where the student is currently placed. DCF will be comparing the list of eligible students to their most current information on state-placed foster children. DCF will update information for these students as needed so the cards will be mailed to the student's current foster parent and address at the time of card issuance.

Q25: Are PreK students eligible for this benefit?

Yes, if your PreK students normally have access to your meals program, they are eligible for this benefit, subject to the same requirements as other students.

Q26: How should we handle students who were only enrolled in our school for part of this year? For example, students who unenrolled in order to switch to home study, or students who moved?

These students are eligible for benefits (assuming all other criteria are met) for the months that they were enrolled in your school. However, they are not eligible for benefits during which they

were not enrolled in your school. Indicate “Not Enrolled” on your list for the months that the students were not enrolled.