

## Maximizing P-EBT for Children Under Six in Households Receiving SNAP:

### Arizona's Simplifying Assumption Options for State Plans

The Pandemic Electronic Benefit Transfer (P-EBT) program provides nutritional resources to families who have lost access to free or reduced-price school meals due to school facility closures or reduced in-person attendance or hours, as well as for children under 6 years old in households receiving benefits from the Supplemental Nutrition Assistance Program (SNAP). States are in the process of developing state plans to implement P-EBT for fiscal year 2021. The U.S. Department of Agriculture (USDA) has prepared a P-EBT [state plan template](#). This brief intends to aid stakeholders in maximizing state P-EBT benefits for children under 6 in SNAP households by providing (1) a summary of Arizona's simplifying assumptions and (2) examples from their approved state plan.

### Summary of Simplifying Assumptions

#### P-EBT Eligibility

If there is at least one school in a county that is closed or doing distance-learning, then all SNAP-enrolled children under age 6 residing in that county are eligible for P-EBT benefits.

Rationale: Arizona allows parents to enroll their children in schools that are not the children's designated school, and the boundaries of charter schools and public schools overlap. Arizona would not be able to "*accurately and expediently determine which school is the correct school*" for children in the P-EBT eligibility system (Arizona's state plan, 2021).

#### Level of Benefits

##### Full Benefits:

- If there is at least one closed or distant learning school in a county, then all SNAP-enrolled children under age 6 residing in that county receive a full P-EBT benefit.
- Full monthly P-EBT benefit amount: average of \$122 (varies by the month)

##### Partial Benefits:

- If there are no closed or distant schools, but at least one mixed in-person/distance-learning in a county, then all SNAP-enrolled children under age 6 in that county will receive a partial P-EBT benefit.
- Partial monthly P-EBT benefit amount: average of \$69.80 (varies by the month)

For more information the following resources are available.

- [FRAC's P-EBT Webpage](#)
- [USDA State Template](#)
- [USDA State Guidance on Coronavirus Pandemic P-EBT](#)
- [USDA P-EBT Q&A](#)

## State Plan for Children Under 6 in Households Receiving SNAP

The following text provides excerpts from Arizona's approved state plan. This serves as an example of how your state can use similar simplifying assumptions to maximize P-EBT benefits for children under 6 in households receiving SNAP.

Bolded text below shows the standardized headings and questions from the USDA's P-EBT state plan template. Key excerpts from Arizona's state plan are inserted as italicized text under the relevant questions. Statements in **red** are simplifying assumptions. You can view Arizona's complete approved P-EBT combined [plan here](#).

### 5. P-EBT For Children in Child Care

**a. Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.**

*“Arizona Revised Statutes Title 15. Education 15-821, A child is eligible for admission to first grade if the child is six years of age. A child is deemed six years of age if the child reaches the age of six before September 1 of the current school year.*

*Arizona Department of Economic Security (AZDES) will identify all SNAP children under 6 years old receiving SNAP benefits starting October 1, 2020, and deem them categorically eligible using our benefit eligibility system, AZTECS.*

*AZDES will identify these children by their county of residence. Only residents who reside within the State of Arizona and intend to remain in Arizona are eligible for SNAP and will be eligible for the child care benefit.”*

**b. How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?**

*“AZDES will use the SNAP eligibility system to determine the benefits received using existing processes in place that conform with SNAP privacy requirements.*

*AZDES will cross-reference this population with any children submitted by the Arizona Department of Education (ADE) to ensure a given child does not receive duplicate benefits. Child care benefits will trump school benefits in the event of an overlap for October 2020 till the end of the program.*

*AZDES will issue a letter to households letting them know benefits will be arriving. Newly eligible child care children will be paid from October 1, 2020, to the latest month available for payment per the issuance schedule on their existing SNAP cases.*

*Newly eligible children will be monitored monthly until the end of May 2021.”*

**c. How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?**

*“The scope of ‘in the area’ is to mean the 15 counties within Arizona and, as such, will be a single designated school every month starting October 2020–May 2021 for child care purposes in each county. Arizona will use the same school learning model data collected by ADE for P-EBT Children in School.*

*Arizona's simplifying assumption would then be if there is one either Closed or Distance school within any area of each county for each month between October 2020 and May*

*2021, the child care P-EBT children would be eligible for the Full P-EBT Benefit. If in any month between October 2020 and May 2021 there is not a Closed or Distance school, Arizona would then use one school reporting a Mixed (Access Flag 2 schools) learning model within any area of each county for each month between October 2020 and May 2021, the child care P-EBT children would be eligible for the Partial P-EBT Benefit.*

*Designated schools and learning models will be tied to child records via county code and reportable. These assumptions will quickly allow Arizona to distribute benefits to the SNAP under 6 population as well as streamline administration and time required to implement.*

*Arizona is making this simplification after considering the age and constraints of our legacy eligibility system, that Arizona schools allow parents to enroll their children in schools other than their designated school using variance waivers, and the number of charter schools that overlap boundaries with our public schools. Arizona would not be able to accurately and expediently determine which school is the correct school for either the child's residence in our eligibility system."*

- d. For children whose residence is not in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:**

- a. the child's child care facility is closed or is operating with reduced attendance or hours, or**
- b. the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?**

*"If in any month between October 2020 and May 2021 there is not a Closed or Distance school, Arizona would then use one school reporting a Mixed (Access Flag 2 schools) learning model within any area of each county for each month between October 2020 and May 2021, the child care P-EBT children would be eligible for the Partial P-EBT Benefit."* [Note: See answer to 5.c.]

- e. Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?**

[Note: No.]

- f. Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools.**

*"There will be a single designated school every month starting October 2020–May 2021 for child care purposes in each county."* [Note: See answer to 5.c.]

- g. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)**

[Note: Every month. See answer to 5.c.]

- h. Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g., which agency is responsible for confirming eligibility).**

[Note: See answer to 5.a.]

- i. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.**

[Note: See answer to 5.c.]

## **6. Benefit Levels**

**Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.**

*“Simplifying assumption: For schools deemed Closed or Distance for the month, AZDES will automatically pay a 100% P-EBT benefit for the month minus holidays and weekends for children deemed eligible for the benefit.”*

[Note: In addition, Arizona has established statewide monthly benefit levels: Full, Partial or None that are dependent on a school's predominant learning model for a reported month. See 5.c. for more information.]