

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

District of Columbia'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 D.C.'s simplifying assumptions and (2) examples from their approved state plan.

Summary of Simplifying Assumptions

P-EBT Eligibility

There was a statewide mandate that all child care centers operate at reduced capacity until social distancing is no longer required. The District's *"simplifying assumption related to this provision will be that all child care centers are operating at a reduced capacity on a statewide level"* (D.C.'s plan, 2021).

"The District will assume that if a child was under the age of six on October 1, 2020, the child is deemed enrolled in a covered child care facility and thus eligible for P-EBT benefits..." (D.C.'s plan, 2021).

Level of Benefits

There will be two tiers of benefits, and the tier used will depend on the aggregate number of in-person student days Districtwide.

"For all children in child care, the District will issue full benefits until the Districtwide aggregate count of in-person student-days hits 50%, at which point all children in daycare will receive the hybrid benefit" (D.C.'s plan, 2021). The amounts of each monthly benefit tier are as follows:

- Full monthly P-EBT benefit amount: \$122.76;
- Hybrid monthly P-EBT benefit amount: \$73.66.

Rationale: *"The bar was set at 50% of student-days because if a school changes to 'hybrid' it will mean the majority of students are receiving in-person instruction"* (D.C.'s plan, 2021).

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 D.C.'s approved state plan. This serves as an example for 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 D.C.'s state plan are inserted as italicized text under the relevant questions. Statements in red are simplifying assumptions. You can view D.C.'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.

"The District will define those children deemed to be enrolled in a covered child care facility under the FFCRA by identifying all children under the age of six on October 1, 2020, as SNAP household members from the District's eligibility system DCAS. This list of SNAP children under age six will be compared to the list of school children eligible for P-EBT to ensure that they are paid only once for the respective benefit month."

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

"The District will determine and confirm the child's receipt of SNAP benefits through data matching completed by DHS against benefit issuance through the child's SNAP household existing SNAP EBT accounts to be compliant with relevant SNAP privacy requirements."

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?

"For all children in child care, the District will issue full benefits until the District-wide aggregate count of in-person student-days hits 50%, at which point all children in daycare will receive the hybrid benefit. This will apply to all children who are under six on Oct 1, 2020, are not enrolled in a school, and are part of a SNAP family. For children under six on Oct 1, who are enrolled in a school, those students will be considered under the P-EBT rules for students. In the District, Pre-K starts at age 3, so a comparatively small number of children will be considered under daycare-only rules."

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?

"In the District, Mayor's Order 2020-075 provided that childcare operations could resume operations with the same staff/child ratios as applicable before the COVID-19 pandemic, with enhanced social distancing and hygiene practices as may be prescribed by OSSE or the DC Department of Health. OSSE guidance issued on Dec 21, 2020, mandates reduced capacity under this order. The enhanced social distancing provision necessitates that all child care centers in the District will be operating at a reduced capacity until social distancing is no longer required. Our simplifying assumption related to this provision will be that all childcare centers are operating at a reduced capacity on a state-wide level."

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 PEBT in those areas?

"The District's current public health ordinances assume that child care facilities' capacity in response to COVID-19 is limited state-wide. As the District manages a state-wide eligibility system, the District can define all SNAP-participant children under age six as deemed eligible for P-EBT, without any additional step to determine the affected geographic area."

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

"The District will identify all SNAP-eligible children under the age of six as of October 1, 2020 and compare it with the list of school students eligible for P-EBT to eliminate any children identified as school children. The District will update the list every other benefit month to add all newly eligible SNAP children through new applications or new-born babies within the existing SNAP households. The District plans to issue P-EBT benefits retroactively to all of the newly eligible SNAP children unless the USDA provides further guidance to limit the retroactive payments for this population before the District is ready to process benefit issuance."

g. 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).

"OSSE is responsible for providing DHS with information on the operating status of DCPS schools and child care facilities in the District. DHS is responsible for identifying SNAP children under six on or after October 1, 2020, comparing both lists to avoid any duplicate benefit issuance and processing benefits."

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

“The District will assume that if a child was under the age of six on October 1, 2020, the child is deemed enrolled in a covered child care facility and thus eligible for P-EBT benefits.... Additionally, child care centers will be assumed to have 18 operating days per month, similar to schools, and a child eligible under this provision will have the same benefit amount for the eligible period. For children whose SNAP enrollment began after October 1, 2020 the District plans to elect the following administrative simplification: for the District’s first P-EBT issuance, the District will issue benefits retroactive to October , 2020 for all children under 6 who are SNAP enrolled at the time of issuance. For future monthly issuances, the District will issue benefits back to the date of the previous issuance (but not further) to the children under 6 who are SNAP-enrolled at the date of the current issuance.”

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.

[Note: See answer to 5.c.] “For all children in child care, the District will issue full benefits until the District-wide aggregate count of in-person student-days hits 50%, at which point all children in daycare will receive the hybrid benefit.”