

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

Massachusetts' 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 Massachusetts' 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 providers reduced attendance and hours, which met the minimum five consecutive days of closure or reduced-attendance or hours threshold.

“Implementation of this statewide public health ordinance confirms all child care centers, statewide, meet the minimum P-EBT eligibility requirements. Therefore, the State intends to certify all children under six who are or were a member of a household that received SNAP benefits at any time since October 1, 2020 as eligible for P-EBT” (Massachusetts' state plan, 2021).

Level of Benefits

The level of benefits for each child is based on the predominant learning model across the state for that month.

“For example, if most of the school aged children receiving P-EBT are enrolled in a hybrid learning model then all non-school children in child care would be eligible for a hybrid benefit amount” (Massachusetts' state plan, 2021). The amounts of each monthly benefit level are as follows:

- Full monthly P-EBT benefit amount: \$136.40;
- Hybrid monthly P-EBT benefit amount: \$68.20.

Rationale: *“This approach [using the predominant learning model] allows for the most accurate representation of school closures across the state, builds off data readily available to the Department of Transitional Assistance (DTA), and naturally builds in the necessary flexibility to account for changing circumstances”* (Massachusetts' state plan, 2021).

What happens to P-EBT when the public health ordinance ends?

Massachusetts will submit an amended plan to USDA if the state lifts the mandate affecting the operation of child care providers before the end of September 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 Massachusetts' 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 Massachusetts' state plan are inserted as italicized text under the relevant questions. Statements in **red** are simplifying assumptions. You can view Massachusetts' 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.

"In response to the COVID-19 public health crisis, EEC implemented "Minimum Requirements for Health and Safety" for all its Massachusetts child and youth serving programs. These guidelines impact child care operations statewide. Specifically included in these requirements are two elements that directly result in "reduced attendance or hours" in child care centers:

- *An increased minimum square foot per child requirement has impacted enrollment limits, subsequently reducing attendance; and*
- *Prohibitions on mixing or combining of groups of children within a child care center reduces staffing flexibility and has limited hours of operation for programs.*

These requirements went into effect in August 2020. Consequently, all child care facilities have met the required "5 consecutive days" criteria.

Implementation of this statewide public health ordinance confirms all child care centers, statewide, meet the minimum P-EBT eligibility requirements. Therefore, the State intends to certify all children under six who are or were a member of a household that received SNAP benefits at any time since October 1, 2020 as eligible for P-EBT."

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

“The State will determine and confirm a child’s receipt of SNAP benefits in accordance with relevant SNAP privacy requirements through use of DTA’s BEACON eligibility system.”

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?

[Note: See answer to 5.a.]

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?

[Note: Not Applicable because the implementation of the statewide public health ordinance confirms ALL child care centers in Massachusetts meet the minimum P-EBT eligibility requirements.]

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?

[Note: Yes, see answer to 5.c.]

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?

“The “Minimum Requirements for Health and Safety” statewide policy will remain in effect until the expiration of the State’s declaration of emergency. Upon expiration of this declaration the State will evaluate any new operating protocols to see if statewide P-EBT eligibility remains is affected.”

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

[Note: See answer to 5.f.]

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).

“DTA is responsible for assessing the “Minimum Requirements for Health and Safety” policies to ensure the reduced hours and attendance for child care centers criteria are met statewide thus conferring P-EBT eligibility. DTA is also responsible

for monitoring monthly data to determine the predominate learning mode P-EBT school aged children are enrolled in and to use this data to determine benefit amounts (see details in the Benefit Level section). The Department of Early Education and Care (EEC) is responsible for the development, communication and implementation of the “Minimum Requirements for Health and Safety” policies which inform operation protocols for all child care centers statewide. EEC is responsible for communicating any changes in these requirements to the Department of Transitional Assistance (DTA).”

- 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 text in red. Red text denotes all the simplifying assumptions made.]

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.

“For non-school children in child care, the State proposes establishing the monthly P-EBT benefit amount based on the predominate learning mode of school aged children for that month. For example, if most of the school aged children receiving P-EBT are enrolled in a hybrid learning model then all non-school children in child care would be eligible for a hybrid benefit amount. This approach allows for the most accurate representation of school closures across the state, builds off data readily available to DTA and naturally builds in the necessary flexibility to account for changing circumstances.”