Maximizing P-EBT for Children Under Six in Households Receiving SNAP:
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 P-EBT benefits for children under 6 in SNAP households by providing a summary of simplifying assumptions for select states with an approved P-EBT state plan.

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
Arizona

Summary of Simplifying Assumptions

P-EBT Eligibility

If there is at least one school in a county that is closed or doing distant 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)

View key excerpts from Arizona’s plan here.

View the full Arizona P-EBT plan here.
Massachusetts

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.

View key excerpts from Massachusetts’ plan here.

View the full Massachusetts P-EBT plan here.
Rhode Island

Summary of Simplifying Assumptions

P-EBT Eligibility

The Rhode Island Department of Education (RIDE) confirmed that all schools have been operating at reduced attendance or hours since October 1, 2020.

“All school districts in the state have been operating at reduced attendance or hours since October 1, 2020, and utilizing a hybrid learning schedule. Therefore, we will assume all SNAP eligible (or previously eligible) children under age 6 can be deemed to be residing in an area where one or more schools have been operating at reduced attendance or hours” (Rhode Island’s state plan, 2021).

Level of Benefits

There will be a uniform hybrid benefit that’s consistent with the “approved plan for school-age children... [and is] a reasonable reflection of scheduled virtual days for all eligible children under age 6” (Rhode Island’s state plan, 2021). The monthly hybrid P-EBT benefit amount is $75.02.

Rationale: “This will be based on the fact that the most prevalent hybrid instructional model throughout the state is one in which students are virtually learning for 3 days each week, and the fact that no child care facilities in the state have been fully closed since October 1, 2020 ... Approximately ninety-nine percent of the students from all the districts across the state that are in a hybrid instructional model are virtually learning for 3 days each week” (Rhode Island’s state plan, 2021).

View key excerpts from Rhode Island’s plan here.
View the full Rhode Island P-EBT plan here.
**Washington, D.C.**

**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).

View key excerpts from D.C.’s plan here.

View the full D.C. P-EBT plan here.