

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

Rhode Island'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 Rhode Island's simplifying assumptions and (2) examples from their approved state plan.

Summary of Simplifying Assumptions

P-EBT Eligibility

The Rhode Island Department of Education 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).

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 Rhode Island'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 USDA's P-EBT state plan template. Key excerpts from Rhode Island's state plan are inserted as italicized text under the relevant questions. Statements in **red** are simplifying assumptions. You can view Rhode Island'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 State will identify eligible children by utilizing the data available within RI DHS's eligibility system. A query will identify all children under six years of age who have been active on SNAP at any point since October 1, 2020. The assumption is that all of these children are eligible for P-EBT because all children under age 6 are deemed to be enrolled in a covered child care facility."

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

"There will be no impact to privacy requirements as this information is already available to RI DHS, the agency responsible for issuing SNAP and P-EBT benefits."

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?

*"RI will use school status only as the basis for P-EBT child care eligibility rather than the operational status of child care facilities. In RI, 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.** This assumption is supported by the monthly school status data provided for the purposes of determining benefit level for school-age children."*

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]

- 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 process RI 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 area schools will be the same process utilized for school age children. Using this information, RI will account for potential new hybrid learning models and assess impact on the statewide average benefit amount for children deemed to be in child care. For example, if RI finds that there is a significant disparity among hybrid models from one school or district as compared to other schools/districts, RI will assess whether an additional standard hybrid benefit amount is needed for children deemed to be enrolled in child care to ensure that these differing hybrid schedules are accounted for. RI will then work with FNS to adjust the benefit amount, as needed."

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

"Based on information provided by the school districts to the RI Department of Education (RIDE), RIDE will reassess the learning model each school in the State is utilizing at least every two months."

- 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).**

"RI DHS will have the primary responsibility for confirming eligibility for P-EBT for child care participants based on the data available in the agency's eligibility system (child under age 6, active on SNAP at some point since October 1, 2020). The RI Department of Education will be primarily responsible for reporting information relating to the operating status of schools in each city/town in RI."

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

*"The use of simplifying assumptions to **create a standard hybrid benefit amount equaling \$75.02 per month is based on the average amount of time a hybrid-learning student is virtually learning across the state.** 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. The use of this*

simplifying assumption is necessary in order to ensure that all eligible children under age 6 receive a standard benefit without having to map every eligible child's residence to a school in the area of the child's residence."

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.

"Consistent with our approved plan for school-age children, we will utilize a uniform hybrid benefit (11 days of eligibility per month, equal to \$75.02) as a reasonable reflection of scheduled virtual days for all eligible children under age 6. 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."