



Simplifying Assumptions for Issuing Pandemic-EBT Benefits in School Year 2021-2022

As of February 10, [13 states](#) have been approved to distribute Pandemic-EBT (P-EBT) benefits for school-age children in the 2021-2022 school year. In some of these plans, states have been approved to utilize simplifying assumptions to issue benefits to children who are absent due to COVID-19 or are attending school virtually while still enrolled in their home school due to the pandemic.

There are many reasons that states may utilize simplifying assumptions. In Michigan, the state agency is not legally allowed to collect and track student-level attendance data or modality data. Other states have similar challenges with capturing student-level data, even if sharing the data is not prohibited, or need to simplify benefit levels to streamline the administration of the program. Below are the different approaches states have been approved to use to issue P-EBT benefits.

Delaware's approved plan:

- Allows schools that are unable to track COVID-19 related absences to assume when a child is absent for five or more consecutive days; it is a COVID-19 related absence. That student is eligible to receive P-EBT benefits for those days.
 - After a school qualifies for the five consecutive day simplified assumption, a parent can individually request P-EBT benefits for COVID-19 related absences for fewer than five days. Parents must submit a request to their child's school and the school will verify that the absences were excused absences.
 - If a school has the ability to track COVID-19 related absences, the school cannot utilize this simplifying assumption.
- Uses a standardized benefit amount for students who are attending school virtually based on 180 instructional days in the school year. This breaks down to 18 virtual days a month or \$127.80 per month for an eligible, fully virtual student.

Colorado's approved plan:

- Utilizes COVID-19 outbreak data from the Colorado Department of Public Health and Environment (CDPHE) to identify school buildings impacted by confirmed outbreaks.¹
 - Once school buildings are identified, Colorado will deem all free and reduced-price eligible students enrolled in in-person learning with a confirmed excused absence in one of the months of the outbreak eligible for P-EBT benefits.
- Sets three different standard benefit amounts for students:
 - Fully virtual students who are still enrolled in their home school-

¹ CDPHE defines an "outbreak" as 5 or more confirmed cases in a group (i.e. classroom, activity) that are not in the same household. An outbreak is considered closed when the school goes 28 days with no new cases.

- Colorado will issue these students \$142 a month, based on the average instructional days each month.
 - Hybrid students or those whose schools have an unexpected closure—
 - Free or Reduced-Price (F/RP) eligible students will receive \$7.10 in benefits for days their school was unexpectedly closed due to COVID-19 once reported to the state.
 - Schools that switch to hybrid learning will be surveyed to find the average schedule. Students will receive the benefit amount equal to that average.
 - In-person learning students impacted by a COVID-19 outbreak at their school—
 - Colorado Department of Education (CDE) will conduct a representative survey of schools with a confirmed outbreak reported by CDPHE to establish an average day count/benefit, based on student excused absences over the Fall 2021 semester.
 - CDE will issue the state-wide average P-EBT benefit to all F/RP eligible students with a confirmed excused absence in one of the months of a CDPHE confirmed outbreak at the student’s school of enrollment and grade.
- Allows families to dispute benefit amounts and issuances if they believe they are incorrect by calling the hotline.

Louisiana’s approved plan:

- Sets benefit levels through a tiered structure.
 - Students absent one to five days due to COVID reasons will receive benefits for three days.
 - Students absent for six to 15 days due to COVID reasons will receive benefits for ten days.
 - Students absent for 16 or more days due to COVID reasons will receive benefits for eighteen days.
 - This tier is also for those attending school virtually who qualify.

Michigan’s approved plan:

- Utilizes data at a building level, each school building reports the predominant model.
 - All students within a building will be assigned the same modality with benefits based on this modality initially.
 - If 10 percent or more of the student population is in-person the whole month, no benefits will be issued.
 - If 90 percent of the student population is fully virtual, then they receive full virtual benefits with the benefit issuance based on the specific number of days school was virtual.
 - If a school changes modality mid-month, the school will report hybrid and provide the number of days the school was virtual. Students in that school building will be issued benefits based on the number of days times the daily total.
- Relies on their reconsideration process to identify students that are missed or are not issued the correct level of benefits.

NOTE: The school building must still meet the five-day threshold.

- This is a manual process where the parent or guardian must fill out a [reconsideration form](#) that is posted online.
- Parents and/or guardians must provide the child's State Student ID number which can be obtained from the school.
- They must also provide proof from the school of a different learning modality or COVID-related absence. This submission must include:
 - Student's name
 - The month for which they are requesting a reconsideration
 - The number of days the student was attending virtually or was out of school for a COVID-related absence.
 - A statement from the school of how the student received instruction for that month
 - Name of the school employee filling out the document
 - The school employee's title, e-mail, and telephone number
- The form and verification from the school are then submitted to the Michigan Department of Health and Human Services, which reviews the form and if approved, issues corrected benefits.

Vermont's approved plan:

- Sets a statewide standard benefit amount based on the average length of COVID-related absences derived from a sample of Supervisory Unions and Districts.
 - This standard benefit amount will be given to each eligible child regardless of the length of absence.
 - The benefit will be recalculated every two months based on the average length of absences.
- Utilizes a tracking system that allows for schools to denote whether or not a student had a COVID-related absence in a certain month.
 - If a free or reduced-price eligible student, or a student attending a Community Eligibility or Provision 2 school, was absent any number of days in a month and the school believes that any one of those days was COVID-related, then the student will be marked to receive the standard benefit amount for that month.

Virginia's approved plan:

- Sets benefit levels through a tiered structure.
 - Students absent one to five days due to COVID reasons will receive benefits for three days.
 - Students absent for six to 15 days due to COVID reasons will receive benefits for ten days.
 - Students absent for 16 or more days due to COVID reasons will receive benefits for 18 days.