



Pandemic EBT

The Families First Coronavirus Response Act creates the Pandemic Electronic Benefit Transfer (P-EBT) program, an important opportunity to provide nutritional resources to families who are losing access to free or reduced-price school meals as school across the country close in response to COVID-19. P-EBT provides households an EBT card with the value of the free school breakfast and lunch reimbursement rates for the days that schools are closed. Schools must close for at least five consecutive days in order for families to receive a P-EBT card. Eligible households include those whose children are certified to receive free or reduced-price school meals and children who attend schools that offer free school meals to all students (such as community eligibility or Provision 2 schools).¹

State Plans

On March 20, 2020, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service provided guidance to states on implementing P-EBT. For a state to provide P-EBT benefits to households, the state's Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition Agencies must submit a joint plan to USDA that describes how they will operate P-EBT. The plan must include the following:

- How the state will provide P-EBT benefits to the eligible families who participate in SNAP and to the eligible families who do not participate in SNAP.
- The amount of the benefits that will be provided. The value of the benefit is the free reimbursement rate for school breakfast and lunch for the number of days that the state is providing benefits. States can use an average number of days to calculate benefit levels and an average end date for school closures.
- The anticipated implementation date(s). States can include two implementation dates: one for families that participate in SNAP and one for those that do not.

State child nutrition agencies and school nutrition departments can release information to SNAP administrators in order to implement P-EBT. Sharing information between child nutrition and SNAP agencies will be critical to providing all eligible households P-EBT cards and should be considered as states develop their plans.

¹ An eligible child includes those who attend a school that offers free school meals under section 11(a)(1) of the Richard B. Russell National School Lunch Act (1759(a)(1)). This includes the special universal school provisions, such as community eligibility and Provision 2.

States also should create a comprehensive communications strategy to inform eligible families and the general public about the purpose of P-EBT and how the benefits can be used.

Things to Consider

Across the country, SNAP offices are struggling to respond to the growing number of families and individuals who are becoming eligible for SNAP benefits. At the same time, social distancing is being encouraged in most if not every community across the country, and many states and communities are beginning to shelter in place. Developing a process that relies on technology, and limits the need for individual families to apply for benefits, will be critical to ensuring that eligible families receive a P-EBT card, and that SNAP agencies are not overwhelmed.

For many states, the first and easiest step will be to increase benefits for all families with school-age children who participate in SNAP. For the other eligible families, states will have varying capacities and will be able to develop different plans based on their data systems. Ideally states will be able to draw on existing data for as many eligible families as possible and minimize the number that must apply. Options could include drawing on the existing direct certification system for school meals, the student data available at the state level, and other data sources that could provide a path for providing benefits to families who do not participate in SNAP.

- States that maintain school meal eligibility and student information at the state level may have the capacity to provide information for all school districts directly to the SNAP agency.
- States may be able to have districts share information directly with the SNAP agency. Data capacity and the number of school districts within the state may impact the viability of this approach.
- States may find that Medicaid data can be used to seamlessly serve more eligible families.
- States may collect student identification numbers in their SNAP applications which may make it easier to track which eligible students are already receiving SNAP.
- States may find that they can use the same approach in their automated systems for issuing P-EBT benefits that they use for Disaster-SNAP for households that do not participate in SNAP.
- For families who cannot be issued benefits based on data from other programs, states may need to develop a very simple application, preferably available online or by telephone.

The guidance references the need for a signature (which could be electronic) for families that do not participate in SNAP, but acknowledges that it could come from outside data sources. In order to achieve this requirement, states could consider alternative

approaches to document acceptance of the benefits, such as specifying that use of the card constitutes a signature or using a PIN.

One of the biggest challenges that states may face is the reliability of household mailing addresses. If school districts or the state are going to share data to make the process more seamless, they could consider reaching out through their communications system now to confirm addresses so that eligible families will receive their P-EBT cards.

States also should consider the process for serving newly eligible families. Because of the economic fallout from the crisis, a growing number of families are losing income and becoming eligible for SNAP each day and also becoming eligible for P-EBT when school close. Similarly, families are becoming eligible for free or reduced-price school meals, which highlights the importance of thinking through the process of certifying families as schools are closed, such as setting up a process to qualify families when they arrive at a site that is distributing meals through the child nutrition programs.

As states develop their plans, USDA may need to provide additional program flexibilities in order to ensure that eligible families receive benefits, and to minimize administrative work for SNAP offices that are already struggling to serve the increase in families eligible for SNAP.

Partnerships

Partnering with community stakeholders can help state agencies prepare and submit comprehensive plans to ensure that all eligible children receive P-EBT benefits during COVID-19 school closures, and can address the issues raised above. Community stakeholders also may be able to help with outreach.

Resources

- [USDA's State Guidance on P-EBT](#)
- [FRAC's fact sheet on the National School Lunch Program](#)
- [FRAC's Community Eligibility Resources webpage](#)
- [FRAC's fact sheet on Summer EBT](#)

FRAC will update this document as additional information about P-EBT develops. For more information on efforts and opportunities to ensure children have access to nutritious meals during COVID-19 school closures, visit [FRAC's website](https://frac.org/COVID-19-updates) (<https://frac.org/COVID-19-updates>).