

Pandemic-EBT: Recommendations for Developing State Implementation Plans

Overview of Pandemic-EBT

The Families First Coronavirus Response Act established the [Pandemic-EBT \(P-EBT\)](#) program to help children who have temporarily lost access to free and reduced-price meals at school due to Coronavirus-induced school closures of 5 days or more. Funds to replace those school meals are provided via an Electronic Benefits Transfer (EBT) card. Children who are enrolled in schools participating in the [Community Eligibility Provision](#) are also eligible for P-EBT benefits. P-EBT is an important policy option available to states to make sure low-income children don't go hungry when schools are closed. It can also help draw in significant federal resources to help support local economies. We encourage states to participate in the P-EBT program. A list of the states that have already applied and been granted authorization for their P-EBT plan can be found [here](#).

USDA Pandemic-EBT Guidance for Submitting Applications

USDA has issued [guidance on P-EBT](#) implementation indicating the key information states should consider in the development of their P-EBT implementation plan. Notably, states:

- Must publicly opt-in to participate in the program
- Submit a comprehensive implementation plan, detailing the mechanisms they will use to verify eligibility for P-EBT for both eligible children in SNAP households and eligible children in non-SNAP-households. Specifically:
 - How the state SNAP administering agency will get the complete roster of students that are eligible for free and reduced-price school meals from local educational agencies.
 - How the SNAP administering agency will match the school enrollment data with the existing SNAP data and determine who will be eligible to receive P-EBT with existing SNAP files and who will need to be issued new EBT cards.
 - How the SNAP agency will set up new cases and issue P-EBT benefit cards to non-SNAP households with children or other categorically eligible children who might be included in other existing data systems such as TANF or Medicaid.
 - How the state will calculate the per child/per day benefit amounts.
 - What strategies the state will utilize to reach out to eligible families and children to maximize program participation and educate those families that have received the P-EBT benefit about the purpose and duration of benefit and any other important information.

Potential Solutions to Overcoming Application Challenges

Many states are still working to finalize their P-EBT implementation plans. One of the biggest challenges for states that have not yet submitted their plans is how to identify and issue benefits to children who are not already participating in SNAP. Below are some recommendations for

how states can address these challenges based on what states that have already submitted their applications have included.

- 1. Establish a robust statewide data-sharing agreement or memorandum of understanding between education departments and public benefit administering agencies.** State and local educational agencies should be able to create or recalibrate their existing student enrollment and program participation data sharing agreements with SNAP, Medicaid/CHIP, TANF, and other emergency service programs administering agencies to meet the new data demand to issuing P-EBT benefits. The existence of a robust data sharing agreement is important to identify and more seamlessly merge the different data systems that have already identified children eligible for free or reduced-price meals and the benefit issuance system to provide P-EBT benefits.
- 2. Utilize USDA Summer EBT for Children (SEBTC) data.** States that have been participating in the [SEBTC](#) program can utilize the most recent summer participation data to help identify children that are eligible for free and reduced-price meals and determine eligibility for P-EBT. Doing so will reduce the amount of time needed to identify eligible children for the P-EBT program, serving as one of the potential sources of readily available data for SNAP agencies. A few children that were eligible for SEBTC before may not be eligible every year as household income fluctuates but the majority of children would remain eligible and many more children could become newly eligible due to their parents' loss of a job.
- 3. Establish an online or mobile application system for non-SNAP households with children that may need to apply for P-EBT.** Unless the SNAP agency or Department of Education has available data in an easily useable format, non-SNAP households with children may be required to apply to receive P-EBT for their children. Due to social distancing and stay-at-home requirements, households are unlikely to be able to apply in person. Paper applications also take more time to complete, submit, and process. Establishing or facilitating an online or mobile application system will help to fast-track the application process for the P-EBT benefit by making the data more quickly available.
- 4. Leverage existing digital tools, technologies, and resources.** Many states are lacking either a statewide free and reduced-price eligible student database or roster or the staffing capacity to manually input existing data into the system needed to issue P-EBT benefits. State agencies can work with technical support providers such as [Code for America](#) to boost capacity in standardizing data transfers, ensuring data reliability/veracity processes and data integration tools or similar other needs, thereby easing the burden on state agency staff.
- 5. Encourage eligible families to apply for SNAP to maximize the number of children that can participate in P-EBT.** The Coronavirus pandemic created unprecedented job losses, with more than 30 million people filing for unemployment to date according to the US Department of Labor. Many of these people may now qualify for SNAP and for those with school-aged children, their participation in SNAP will also ensure that children receive much-needed food assistance from P-EBT.

Recommendations to Include in Applications

Including the following components in a state P-EBT application can help to ensure more effective implementation. These include:

- 1. Request federal P-EBT funding to cover the cost of serving meals to children for the rest of the school year.** We do not know how long the pandemic and the associated school closures will last. Many states are extending stay-at-home and other social distancing guidelines well beyond the official end of the school year in their states. Therefore, states should request a P-EBT benefit amount that considers all days they are anticipating that schools will be closed based on their state's emergency declaration decisions and local circumstances instead of limiting the request to the first few months where schools were closed.
- 2. Establish a coordinated and collaborative public information campaign to alert eligible families and children about the availability of P-EBT.** State SNAP agencies should coordinate and collaborate with education departments, schools, and districts to distribute information by paper and other existing modes of communication about P-EBT to eligible families and children across the state. SNAP agencies should also consider conducting public service announcements and robocalls through school systems to inform eligible families with children about P-EBT, how to utilize it and other application information. It is also important to establish an easily accessible hotline where eligible families can utilize if they did not receive the P-EBT card due to mailing errors, or if they have any follow up questions associated with on-time benefit receipt, or to inquire eligibility to the program.