FAQs on Pandemic EBT (P-EBT) for Children in Covered Child Care Facilities

This FAQ addresses the option for distributing P-EBT to children under the age of six who are not yet in school. This reflects guidance available as of May 11, 2021.

For additional information on P-EBT for school-aged children, see this FAQ.

Summary
Households participating in SNAP that include children under the age of six may be eligible to receive automatic P-EBT benefits, which can be used like SNAP benefits to purchase groceries. Eligibility does not depend on the children being enrolled in child care. However, the household must live in an area where schools are closed, operating virtually, or operating reduced days or hours due to COVID-19 for at least five days in a row. The exact monthly benefit per child will vary depending on school operating status. States may utilize child care operating data instead of school data, but benefit levels are likely to mirror benefits for children in local schools. While states still need to opt in and submit detailed plans, households are generally not expected to apply or take action to receive benefits. Child care providers should not need to take any action, either. Based on the American Rescue Plan and the latest guidance, children under age six in SNAP households are eligible to continue receiving P-EBT through summer 2021. P-EBT will be available for the duration of the COVID-19 public health emergency.

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1. **What is Pandemic EBT (P-EBT)?**

Pandemic Electronic Benefit Transfer (P-EBT) is a food benefit initially created to support students who are eligible for free or reduced-price school meals. P-EBT gave families funds to make up for the school meals that students missed while schools were closed due to COVID-19 during the spring of 2020.

Families that already participated in the Supplemental Nutrition Assistance Program (SNAP) received extra money on their electronic benefit transfer (EBT) cards, and families that did not participate in SNAP received an EBT card with the P-EBT benefits. The EBT card functions like a debit card that can be used to purchase groceries.

2. **When and how did P-EBT start?**

P-EBT was authorized by Congress through the Families First Coronavirus Response Act (FFCRA) in March 2020. P-EBT is a state option, but ultimately, all states implemented P-EBT for school-aged children to cover missed meals during the spring of 2020. The FFCRA only authorized P-EBT through September 30, 2020.

3. **Has P-EBT continued or changed since September 2020?**

Yes, in late September 2020, Congress extended P-EBT through September 30, 2021. Congress also updated P-EBT to allow for benefits if schools are open for limited days or hours, not just when schools are entirely closed. Finally, Congress expanded P-EBT to children under the age of six in certain circumstances. This is known as **P-EBT for Children in Covered Child Care Facilities**.

In late December 2020, Congress made additional updates to help simplify how P-EBT works this school year. Given the complexity of school operations, states can make certain assumptions based on the best available data. This is detailed in our other FAQ. Congress also simplified eligibility for Children in Covered Child Care Facilities, as discussed in Q6.

Most recently, as part of the American Rescue Plan passed in March 2021, Congress authorized the extension of P-EBT benefits for the duration of the COVID-19 public health emergency (even if that is beyond September 2021). The American Rescue Plan also extended P-EBT benefits through the summer break (up to 90 days) following a school year in which there was a COVID-19 public health emergency declaration, which includes summer 2021. Finally, it extended benefits for Children in Covered Child Care Facilities to the U.S territories of Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands, effective October 1, 2020.

4. **Who administers P-EBT?**

P-EBT is administered at the federal level by the U.S. Department of Agriculture (USDA). Each state must opt in to offering P-EBT in their state by submitting a plan to the USDA. The state plan requires coordination between the agency that administers the child nutrition programs and the agency that administers SNAP.

5. **How do state plans work for P-EBT for Children in Covered Child Care Facilities?**

States and territories may submit separate plans for school-aged children and Children in Covered Child Care Facilities, or one plan that addresses both. States can implement P-EBT for school-aged children during School Year (SY) 20-21 with or without implementing P-EBT for Children in Covered Child Care Facilities. States and territories that have already submitted plans for school-aged children this school year can submit an amendment to add children under the age of six. The state plan must address details such as the estimated number of children to be covered, how benefits levels will be determined, estimated administrative funds needed, and a tentative schedule for issuing benefits. Also, a plan amendment must be submitted and approved in order for the state to issue P-EBT benefits during Summer 2021.
6. **Who exactly under the age of six is eligible for P-EBT?**

P-EBT for Children in Covered Child Care Facilities is available to children under the age of six if:

- The child resides in a household that has participated in SNAP at any point since October 1, 2020, **and**
- The child resides in an area where schools are closed, operating virtually, or operating reduced days or hours due to COVID-19 for at least five consecutive days.

Regarding the second criteria, states may choose to use the operating data for child care facilities, especially if schools are not closed, operating virtually, or operating at reduced days or hours for at least five consecutive days. The child care facility must be closed or operating with reduced hours or attendance for at least five consecutive days. States may also base eligibility on whether schools near the child care facility are closed, operating virtually, or operating reduced days or hours for at least five consecutive days. These other options, particularly the last, would possibly only be used in cases where the state is not determining eligibility based on the child’s residence and is looking at the child’s enrollment in child care. Use of child care operating data is also discussed in Q10.

In addition, children under the age of six who attend a school that participates in the National School Lunch Program (NSLP) may be eligible. This could include a preschool or Head Start program run by a school that provides meals through the NSLP. In this case, children may be eligible for P-EBT even if they are not part of a household receives SNAP benefits as long as they are eligible for free or reduced-price meals through NSLP or attend a school where all students receive meals at no charge. Again, the school must be closed, operating virtually, or operating reduced days or hours for at least five consecutive days. Such children were eligible for P-EBT last school year and continue to be eligible through P-EBT for school-aged children. The state is responsible for ensuring that children under the age of six do not receive duplicate benefits through both P-EBT options.

For information on eligibility for benefits during Summer 2021, see Q19.

7. **Does P-EBT for Children in Covered Child Care Facilities actually depend on being enrolled in child care?**

No. Due to the lack of centralized child care enrollment data, Congress amended the legislation authorizing P-EBT for Children in Covered Child Care Facilities. The change allows all children under the age of six who reside in households participating in SNAP to be considered enrolled in a covered child care facility. States may still choose to utilize child care facility data as part of their plans, as discussed in Q10, but states are generally not expected to tie benefits to individual children’s enrollment for care.

8. **Does this mean that all children under the age of six in households that participate in SNAP automatically get P-EBT?**

No. As discussed in Q6, one of the following criteria must be met:

- The child resides in an area where schools are closed, operating virtually, or operating reduced days or hours due to COVID-19 for at least five consecutive days; or
- A child care facility is closed or operating at reduced attendance or hours due to COVID-19 for at least five consecutive days; or
- A child care facility is in an area where schools are closed, operating virtually, or operating reduced days or hours due to COVID-19 for at least five consecutive days. This would likely only be used if a state is not establishing eligibility based on a child’s residence and is instead looking at where a child in a household that participates in SNAP is enrolled for child care.
Once these criteria are met, most households participating in SNAP with one or more children under the age of six should receive P-EBT without action needed on their part. This is also discussed in Q12.

9. **What does it mean to be “in an area” where schools are closed, operating virtually, or operating reduced days or hours?**
   States can define this as part of their implementation plan. The USDA guidance does not indicate that school zoning or attendance boundaries must be used. It may be sufficient to confirm that the child’s residence or the child care facility is located within a school district, county, or region where the state has established that one or more schools is closed, operating virtually, or operating with reduced attendance or hours.

10. **Can child care operating data be used instead of school operating data?**
    Yes, states may choose to utilize child care operating data as part of their P-EBT plan for Children in Covered Child Care Facilities.

    For example, if a state or local public health ordinance has closed or reduced the capacity of child care facilities due to the public health emergency, then that could be justification for extending P-EBT to all children under age six in SNAP participant households who reside in the area covered by the ordinance. The state plan could also involve data obtained from the child care licensing agency regarding child care access and participation or from the CACFP state agency regarding meal claim information in order to draw conclusions about the operating status of child care facilities in an area.

11. **Do child care facilities have to take any action to help their enrolled children receive benefits?**
    It is unlikely that any action will need to be taken by child care facilities.

12. **Do families have to take any action in order to receive benefits?**
    It is not definite without seeing approved state plans, but most SNAP households with children under the age of six should receive benefits automatically without needing to take action. The state agency that administers SNAP should notify these households in advance of distributing the benefits and explain how the benefits were calculated, though. The state agency should also tell households how they could decline P-EBT if they wish.

    The state P-EBT plan for Children in Covered Child Care Facilities may call for asking SNAP households with children under six if they are affected by the closure or reduced capacity or hours of their child’s care provider. This should only occur if there are no schools in the area that are closed, operating virtually, or operating reduced days or hours and there are no other data sources or simplifying assumptions that would allow for eligibility to be determined automatically.

13. **How are benefit levels determined?**
    During the school year, eligibility for Children in Covered Child Care Facilities will likely be tied to school operating data in most cases. If so, benefit levels for Children in Covered Child Care Facilities would be the same as the benefit level for students in that area. The exact benefit amount per month will depend on school operating status and may vary by month. For information on benefits during Summer 2021, see Q18.

    States have the option to distribute benefits in advance (i.e. distribute benefits to cover the month of March in February) or after the fact. If states issue benefits in advance, they must reassess school or child care operating status at least once every two months and are encouraged to do so monthly or more to best reflect actual operating status.
The maximum daily benefit is $6.82 per child per day in the contiguous United States, including the District of Columbia. (School meals reimbursements and therefore P-EBT benefit levels are higher in Alaska, Hawaii, Guam, the US Virgin Islands, and Puerto Rico, to account for higher food costs.) The daily benefit includes the value of a school breakfast, lunch, and a snack. Benefits are available for a maximum of five days per week (no weekends). If schools in the area are closed or operating completely virtually for an entire month with 20 school days, the monthly benefit would be $136.40 per child. If schools in the area are operating under a hybrid schedule model, the benefit level would be less to account for the average number of meals students have access to meals at school.

States should have a way for households to request a higher benefit level if they feel that they are entitled to it, such as if their child’s care provider is closed, but the P-EBT benefit level is less than the maximum due to schools in the area operating under a hybrid schedule model.

14. **When do benefits start? When can families expect to receive benefits?**
The exact timing is uncertain. States must submit a plan to USDA and receive approval. Then the state must implement its plan, including any necessary data matching to determine eligibility and benefit levels based on school or child care operating status.

15. **Are benefits retroactive?**
Yes, states may issue benefits retroactively back to October 1, 2020. Although state plans for school-aged children may provide benefits retroactively to the beginning of School Year 2020-2021 (SY20-21), benefits for Children in Covered Child Care Facilities may not go back any earlier than October 1, 2020.

16. **Will retroactive benefits be issued all at the same time?**
USDA guidance encourages states to issue retroactive benefits in at least two separate installments and to stagger distribution to families over several days.

17. **How long will benefits last?**
For households that continue to receive SNAP benefits, monthly P-EBT benefits should last at least until the end of the school year according to the calendar of nearby schools. For households that stop participating in SNAP, it is possible that P-EBT benefits will continue through the school year as well. USDA will need to confirm this with additional guidance.

Additionally, based on the recent passage of the American Rescue Plan and recent USDA guidance, P-EBT benefits can continue through summer 2021, pending approval of a state plan to extend benefits through the summer. P-EBT benefits may also continue into next school year if the COVID-19 public health emergency continues and schools or child care facilities face closures or reduced hours or attendance.

18. **How will benefits for summer 2021 work?**
First, states must have an approved plan for SY20-21. Then, states must amend that plan to include the distribution of benefits for Summer 2021.

According to USDA guidance, all schools and child care facilities can be considered closed due to COVID-19 during the summer. This allows all children to receive the maximum daily benefit per child per weekday. (See Q13 for more on the maximum daily benefit.)

The USDA conducted a scan of the largest school districts in every state and determined that the median length of the summer break is 55 days. This translates to $375 in P-EBT benefits for the entire summer in the continental U.S. The USDA invites states to utilize this median break length in
order to provide a standard benefit of $375 to all children. However, states may choose to calculate their own statewide benefit level if the USDA’s approves of how they calculate it. Or, the state may tailor benefits based on each school district’s summer break length. In any case, benefits cannot be given for more than 90 days.

The USDA guidance encourages states to provide benefits in two or three separate distributions over the course of the summer. Similar to benefits for SY20-21, families will receive P-EBT benefits on their SNAP EBT card.

19. Are the same children eligible for P-EBT benefits in summer 2021?
The eligibility requirements are similar for summer 2021: children under age six who have not yet entered school and reside in households participating in SNAP will be eligible for P-EBT over the summer. The main difference is that there is no requirement to be affected by the closure or reduced hours or capacity of a child care provider or to live in an area where schools are closed, operating virtually, or operating for reduced days or hours. In the summer, all schools and child care facilities are considered closed, so all children are eligible for the full benefit.

Children who are born into SNAP households during the summer will be retroactively eligible for the full summer benefit. Children in families whose SNAP participation begins or ends during the summer are also eligible for the full summer benefit.

20. Can families that receive P-EBT still receive meals for their child through their child care provider, local school, or other community organization?
Yes, families may still utilize free meal distribution or meal delivery through their child care provider, local schools, or other community organization, where available. Families are not required to choose between P-EBT and meals offered through other federal child nutrition programs like the CACFP or Summer Food Service Program.

During the summer, all children may receive full P-EBT benefits regardless of whether or not they attend summer school, child care, or other camps or programs that provide meals. Families may also take advantage of free summer meals at distribution sites. During the school year, state plans are intended to minimize issuance of P-EBT benefits to children who receive meals as usual while receiving in-person care or instruction. Still, this may occur due to the limitations in the data available to the state agency. However, families may still contact their state if they believe that they received the benefits in error or wish to decline them.