



Food and Nutrition
Service

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February 25, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Arizona's State Plan for Children in Schools and Child Care

TO: Bill Ludwig
Regional Administrator
Southwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260) authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Arizona's enclosed plan to operate P-EBT for children in schools and child care.

Summary of Arizona's Plan

The Arizona Department of Economic Security and the Arizona Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The State's plan for school children covers the months of August, 2020 through May, 2021. The State's plan for SNAP-enrolled children in child care covers the months of October, 2020 through May, 2021.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service through their schools or child care providers.

Children in Schools

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on SY 2019-2020 eligibility data will have a means to address that they do not issue benefits to last year's graduates and non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, Arizona has or will:

- begin issuing child care benefits for October as early as March,
- issue school benefits and child care benefits for months through November in April, depending on timely receipt of school schedule information from schools,
- issue benefits for the rest of the school year as follows:
 - **May:** benefits for months through April, including catch-up benefits for past months as necessary;
 - **June:** benefits for months through May, including catch-up benefits for past months as necessary;
 - **July, August, September:** benefits for any past months, as necessary,
- stagger each monthly issuance over a two week period (after the issuance of SNAP benefits) based on children's last names,
- create a web portal for schools and school districts to report their school-level learning models; schools will report a separate learning model for each month of the school year on a retroactive basis according to the schedule above,
 - schools that offer a constant learning model for every instructional day of the month will report their status as follows:
 - **Access Flag 1:** the school is closed or only offers distance learning (with no in-person or hybrid schedule for any student),
 - **Access Flag 2:** the school offers a combination of in-person and distance learning,
 - **Access Flag 3:** the school is fully in-person (with no distance learning or hybrid schedule for any student),
 - schools that move from one model to another during the course of a month will report their status as follows:
 - **Access Flag 1:** if there are more Access Flag 1 days in the month than either Access Flag 2 or Access Flag 3 days,
 - **Access Flag 2:** if there are more Access Flag 2 days in the month than either Access Flag 1 or Access Flag 3 days; OR if there are more Access Flag 3 days in the month than either Access Flag 2 or Access Flag 3 days, but there are at least some Access Flag 2 days or Access Flag 1 days,
- issue a full P-EBT benefit to eligible students in Access Flag 1 schools,
- issue a partial P-EBT benefit to eligible students in Access Flag 2 schools,
- determined the average start date, end date, and instructional days per month by surveying all school district calendars; will use this average count of instructional days to issue the same full P-EBT benefit across the State,
- sampled hybrid schedules from 150 schools at the time of plan submission to determine that three distance learning days per week (60%) is the most common hybrid schedule; the State will issue a 60% benefit for children in Access Flag 2 schools for benefit months through February; the State will reassess this partial benefit every month after February based on updated school schedule data.

Children in Child Care

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Arizona will:

- identify the county of residence for each SNAP-enrolled child under age 6,
- for each month from October through the end of the school year, determine whether any school in the county has at least one school that is closed or offering only distance learning to its students:
 - if the State identifies at least one such school, all SNAP-enrolled children under age 6 will receive a full P-EBT benefit in the same amount as the children in the county's closed or fully distance learning schools;
 - if the State does not identify at least one such school, but identifies at least one school offering mixed in-person/distance learning, then all SNAP-enrolled children under age 6 will receive a partial P-EBT benefit in the same amount as the children in the county's mixed in-person/distance learning schools.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

Estimated Caseload and Value of P-EBT Benefits

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State's plan.

- Arizona estimates that it will issue \$505.3 million to approximately 631,000 school children for school closures and reductions in attendance and hours extending from August, 2020 through May, 2021.
- Arizona estimates that it will issue \$130.9 million to approximately 134,000 SNAP-enrolled children in child care from October, 2020 through May, 2021.

Release of Information

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Arizona. Section 1101(e) of the Act states, "Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section."

Plan Timetable and Revisions

Arizona will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

Civil Rights

Arizona will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

Administrative Funds

The Arizona Department of Economic Security will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State's operational plan evolves.

Reporting

The Arizona Department of Economic Security will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Arizona's commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Southwest Regional Office.

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs