USDA
United States Department of Agriculture

Food and Nutrition Service

1320 Braddock Place
Alexandria, VA
22314

January 28, 2021

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Vermont's State Plan for School Children

TO: M. Christine Ruggieri
Acting Regional Administrator
Northeast 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) authorized the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Vermont's enclosed plan to operate P-EBT for school children.

Summary of State's Plan
The Vermont Agency of Human Services, Department for Children and Families, Economic Services Division and the Vermont Agency of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. The State's plan covers the months of September 2020 through June 2021.

Children are eligible 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. The State will issue benefits only to households with children whose schools are closed or have reduced the number of days or hours that students attend the school for at least 5 consecutive days.

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 exclude 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, Vermont has or will:

- issue benefits for the months of September through December in a single distribution after plan approval,
- issue benefits for the rest of the school year retrospectively on a quarterly basis:
    - school districts will submit any changes in

  - the State issuances are tentatively scheduled for February, April, and July,
- reviewed school district schedule data at the time of plan submission and determined that a 10.5 day average benefit is a reasonable reflection of hybrid schedules across the state for September through December,
- collect schedule data from school districts every month for the remainder of the school year,
- use schedule data collected from school districts to set or adjust average benefits for each remaining two-month period in the school year for children with hybrid schedules; if justified by the data, the state will set a single statewide average benefit for these children, and
- set a constant monthly benefit for children with fully virtual schedules equivalent to 17.5 days by averaging the number of instructional days by the number of months in the school year.

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 free breakfast and lunch multiplied by the number of benefit days calculated as described in the State's plan.

Vermont estimates that it will issue $29.6 million to approximately 39,000 children for school closures and reductions in attendance and hours extending from September 2020 through June 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 Vermont. 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
Vermont 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 Northeast Regional Office as soon as possible. The FNS Northeast Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

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Civil Rights
Vermont 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 Vermont Agency of Human Services, Department for Children and Families 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 Vermont Agency of Human Services, Department for Children and Families will complete the FNS- 292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

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

Sincerely,
CYNTHIA LONG Digitally signed by CYNTHIA LONG
Date: 2021.01.28 16:25:37 -05'00'
Cindy Long
Deputy Administrator
Child Nutrition Programs