

RESEARCH REPORT

# Documenting Pandemic EBT for the 2020–21 School Year

## State Perspectives on Implementation Challenges and Lessons for the Future

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# Executive Summary

The Pandemic Electronic Benefits Transfer (P-EBT) program was launched as an effort to address the loss of access to free and reduced-price school meals due to widespread school closures at the onset of the COVID-19 pandemic. As schools reopened in a shifting mix of fully virtual, hybrid, and in-person formats and families lacked consistent access to school meals, these benefits were extended through the 2020–21 school year and were highly valuable to families in buffering the full extent of food insecurity they may have faced during this uncertain time. However, the complexity of administering this program was a fundamental barrier in providing timely support to families, who ultimately went without benefits for at least half of the school year. In this report, we dive into the challenges state administrators faced in launching this new program during the 2020–21 school year and reflect on considerations for the future.

## Methodology

This study was developed as a partnership between the Urban Institute team and the American Public Human Services Association (APHSA), a membership association representing human services agencies and the Supplemental Nutrition Assistance Program (SNAP) programs they administer. We designed this project to follow states' decisionmaking process in real time as administrators navigated changing legislative and administrative environments and devised strategies to address the challenges they encountered. To do so, we

- gathered ongoing qualitative insights from state SNAP directors through periodic online meetings with states conducted by APHSA;
- conducted a rapid response survey to understand states' initial thinking in December 2020;
- conducted four focus groups with state P-EBT administrators and one focus group with state education administrators in April 2021; and
- conducted a final rapid response survey in July 2021 to supplement our understanding about states' approval processes.

## Findings

States faced a series of external challenges arising from decisions and processes occurring at the federal level that prohibited administrators from having sufficient time to plan and administer benefits within the school year. These challenges included, but were not limited to

- delays in congressional authorization for a full SY 2020–21 program;
- a lack of timely and clear guidance from the Food and Nutrition Service about how to implement P-EBT, which created challenges and delays when states sought to obtain approval for their plans; and
- untimely administrative funding, which impeded states' ability to adequately staff their teams.

States also faced internal challenges emerging from a lack of infrastructure and capacity within their state, including:

- Serious barriers to obtaining quality data needed to administer & physically issue benefits, including issues with data sharing between SNAP and education entities, assessing eligibility, and tracking constantly shifting school status;
- Staffing constraints and limited resources to keep up with data infrastructure & customer services requests; and
- Limited precedent for coordination between state and local SNAP and child nutrition stakeholders.

## Key Recommendations

Many of our recommendations are based on feedback from state agencies administering P-EBT based on their assessment of the strengths and weaknesses of the SY 2020–21 implementation process and their insights into how future iterations could be handled more effectively, either in emergency situations or in building an infrastructure for wider use of these types of programs during the summer months. They include:

1. Considering a **standing authority for a P-EBT program** that automatically kicks in during periods when in-person school learning is disrupted.
2. Providing **timely, clear guidance**, and **establishing simple and feasible options** for state implementation wherever possible.
3. **Simplifying data collection** requirements, and allowing for a national, **standardized benefit** for all eligible children.
4. **Increasing flexibilities** in allowable uses for **administrative funding** so states can build infrastructure.
5. **Examining existing infrastructure around EBT card stock** to shorten the time between benefit authorization and receipt and **investing in infrastructure around digital wallet/mobile EBT**.

# Background

The Pandemic Electronic Benefits Transfer (P-EBT) program was launched in March 2020 to address the loss of access to free and reduced-price school meals due to widespread school closures at the onset of the COVID-19 pandemic. Although many schools were able to offer an alternative for families to pick up meals during the week, these efforts were not sufficient in meeting the increases in food insecurity for families that resulted from the loss of in-school meals for a variety of reasons, including transportation and work-related barriers, concerns about traveling outside the home because of the risk of virus exposure, lack of child care, and/or the need for parents/caregivers to supervise virtual learning at home during meal distribution periods.<sup>1</sup> The P-EBT program was designed as a supplemental strategy to provide food benefits on a debit-style card rather than require parents to leave home and pick up prepared meals. This new benefit provided families with an amount equivalent to the daily reimbursements for breakfast and lunch (at least \$5.70 a day) that parents/caregivers could then use to purchase food.

Standing up a brand-new program to serve millions of families across the US would be a complex undertaking under any circumstance, but the urgent time frame and increased need amid the pandemic environment made implementation even more challenging. Personnel from state Supplemental Nutrition Assistance Program (SNAP) agencies, child nutrition agencies, and local school food authorities were shifting to remote ways of working and contending with a host of new challenges—ranging from the launch of virtual instruction to the increased volume of applications for SNAP benefits. The program also required a new, intensive level of collaboration between education administrators and state SNAP agencies that had not previously existed. The initial spring 2020 P-EBT program was implemented in response to nationwide school closures during the pandemic. States faced significant challenges, including a lack of accurate address information for many student households, the complexity of establishing interfaces between school-provided student data and SNAP administrative systems, and the need to develop benefit issuance procedures for households already enrolled in SNAP as well as for non-SNAP households. These early implementation challenges have been well documented in earlier work by Kone Consulting, the Food Research and Action Center, and the Center on Budget and Policy Priorities.<sup>2</sup>

The spring 2020 implementation provided state administrators lessons on several key issues that had to be resolved—for example, the extent to which addresses on file with schools were inaccurate or had changed during the pandemic, the logistics of ordering and disseminating new EBT cards in a short time frame, and best practices for handling benefit issuance. A second iteration of the P-EBT program

was developed when it became increasingly clear that schools were not likely to fully reopen in person for the 2020–21 school year (SY); however, despite states' best intentions to carry forward lessons learned from the initial spring 2020 implementation, P-EBT for SY 2020–21 brought brand-new challenges that were even more complex than those encountered in spring 2020. Many of the challenges experienced in SY 2020–21 were compounded by a delay in legislative authorization for a SY 2020–21 program and a lack of timely guidance from the US Department of Agriculture's (USDA) Food and Nutrition Service (FNS) on how states should interpret legislative parameters.

The most challenging requirement encountered by states was the USDA's determination that benefits would need to be tailored to the wide variety of student learning models that were emerging in the new school year, which included a shifting mix of fully virtual, hybrid, and in-person formats. This complicated mix of learning models for the school year was fundamentally different from the spring 2020 benefit issuing environment, which in some ways was easier as schools were essentially uniformly closed across the country. In a series of conference calls, focus groups, and individual interviews with state administrators during fall 2020 and spring 2021, states identified the need for accurate and timely data on individual school and student attendance patterns as the single largest obstacle to being able to launch a timely program.

As a result, the first state plan for SY 2020–21 wasn't approved by FNS until mid-December 2020, and most state plans were not finalized until late winter/early spring 2021. Despite well-intentioned efforts on the part of policymakers and administrators at multiple levels, students in many states went several months during the school year without receiving P-EBT benefits. Multiple state officials responsible for the P-EBT program expressed deep concern and frustration over not being able to provide a timelier response to households in need and emphasized the importance of documenting and acting upon lessons learned to inform and design future emergency responses, including for SY 2021–22 and summer P-EBT programs planned for 2021 and 2022. Despite the challenges experienced during SY 2020–21, many administrators also expressed the belief that the program was a valuable support for families and that they were proud of their team members for the extraordinary efforts undertaken to navigate the complexities encountered in launching a new program during the pandemic.

# How the Research Was Conducted

This study was developed as a partnership between the Urban Institute team and the American Public Human Services Association (APHSA), a membership association representing human services agencies and the SNAP programs they administer, to explore the choices states made in launching P-EBT during SY 2020–21, analyze the implementation challenges they encountered, and identify recommendations for future iterations of the program.

## Methodology

Because the implementation of SY 2020–21 P-EBT evolved over many months, we designed this project to follow states' decisionmaking process in real time as administrators navigated changing legislative and administrative environments and devised strategies to address the challenges they encountered. Throughout the project, we gathered qualitative insights from state SNAP directors through periodic online meetings with states conducted by APHSA. During these meetings, we also collected quantitative data through participant polling to augment on-the-ground insights members shared after each round of new guidance.

In December 2020, we conducted a rapid-response survey with APHSA to understand states' initial thinking around SY 2020–21 plan submissions after preliminary guidance was released in mid-November. This preliminary guidance allowed for simplifying assumptions in determining benefit allocations. We asked states which simplifying assumptions they planned on using for establishing school status, benefit issuance timelines, benefit level determination, data collection around student eligibility, and staffing. The survey was sent to contacts in all 50 states and the District of Columbia, and 38 states (76 percent) responded. All states were contacted by APHSA given their existing relationship and engagement with state SNAP administrators. The results of the survey were then summarized and shared back with states in a subsequent all-state meeting as a way for states to see what their peers were planning in regard to P-EBT for SY 2020–21.

In April 2021 we conducted four focus groups with state P-EBT administrators. APHSA invited state administrators to participate in these focus groups. The focus groups were held over Zoom, with two team members taking notes. We grouped states into early adopters, those implementing standard benefit amounts, and those using individual benefit amounts, and we aimed to speak with an even mix of states with larger and smaller populations as well as states with a mix of political affiliations. We

used a semistructured focus group protocol and asked about experiences implementing P-EBT, including guidance released by FNS, receipt of administrative funding, and relationships with state education agencies and school districts. We also asked about suggestions for improvements and recommendations for future rounds of P-EBT. We consolidated notes and used a basic framework analysis method to chart responses based on key themes.

We also conducted one focus group with state education administrators organized with the assistance of the Council of Chief State School Officers, using a similar approach, and asked about their experience implementing P-EBT, perception of the P-EBT program among school nutrition programs, the collection of student-level school meal eligibility data, relationships with state SNAP agencies, and administrative funding.

Finally, in July 2021 we conducted another rapid-response survey with states to supplement our understanding of how easy or difficult the approval process was for SY 2020–21 plans. The survey was sent to contacts in all 50 states and the District of Columbia, and 29 states (58 percent) responded.

While our aim was to be comprehensive in covering a range of perspectives, there are notable limitations to our methodology; namely, we only spoke with 20 states in our focus groups and thus did not capture every state’s perspective. However, we were able to speak with states from an even mix of majority political parties and three states in our one focus group with child nutrition administrators.

# Overview of Program Timeline

## Initial Launch in Spring 2020

This section will dive into more detail around the program timeline—for a condensed timeline of all P-EBT-related legislation, see appendix A. In March 2020, Congress acted to ameliorate some of the immediate economic shocks arising from the coronavirus pandemic by passing the Families First Coronavirus Response Act,<sup>3</sup> which included a new federal child nutrition program known as P-EBT. This program was meant to operate through and alongside SNAP and was designed to allow states to provide emergency funds to families with children who would have received free or reduced-priced meals (breakfast and lunch) if not for school closures in response to the COVID-19 pandemic.<sup>4</sup> The program provided approximately \$250–\$450 in benefits per child in the household during school closures in spring 2020, depending on when the states’ school year ended and the states’ average daily reimbursement rates for breakfast and lunch, adjusted for certain geographic locations:

- \$5.70 for the contiguous US
- \$6.66 for Hawaii, Guam, the Virgin Islands, and Puerto Rico
- \$9.16 in Alaska

In mid-April 2020, FNS released guidance for states to submit a P-EBT plan for fiscal year 2020, which encompassed SY 2019–20. Each state and Washington, DC, submitted a P-EBT plan detailing the average number of days schools were closed in the state and awarded benefits based on whether households had a child whose school was closed for at least five consecutive days. All states, the District of Columbia, and the Virgin Islands<sup>5</sup> had approval to initiate a P-EBT program by August, though the initial implementation of these new programs was uneven due to a host of logistical and technical challenges.<sup>6</sup>

## Uncertainties around Extension to the 2020–21 School Year

The initial legislation and regulatory guidance governing P-EBT was primarily focused on providing a response to the abrupt closures of schools across the US in spring 2020, and funding was only authorized through the 2020 federal fiscal year, which ended September 30, 2020. As the pandemic

continued unabated during the summer of 2020, there was increasing uncertainty about the prospects for in-person school attendance for the school year in fall 2020.<sup>7</sup> State education administrators and school districts across the country spent much of the summer devising plans for virtual and/or hybrid attendance that would reduce the number of students attending in person to facilitate social distancing.

Unfortunately, both legislative authority and federal guidance from the USDA lagged behind any timetable that would have permitted seamless administration of benefits by states for SY 2020–21. It wasn't until mid-August 2020 that FNS provided clarifying communication to states that they could amend their initial P-EBT plans to include an August/September 2020 extension of benefits to cover the transition into the new school year. State education agencies often lacked systematic, documented information on return-to-school plans for all districts. Even when information was available, state SNAP administrators lacked centralized eligibility and benefit issuance systems specific to P-EBT. As a result, much of the eligibility and benefit determination process was labor intensive and often reliant on dozens of spreadsheets sent by individual districts or schools in non-standardized formats; one state P-EBT administrator mentioned they collected data manually via Excel spreadsheet from each school in the state. Moreover, many states were still issuing benefits or resolving problems for the prior spring closures, leaving staff with limited capacity to create the additional August/September issuances. With guidance from FNS reaching states so late, only 18 states, the District of Columbia, and the US Virgin Islands were able to adopt the option to issue benefits for August and/or September before the end of 2020 (later, states had the opportunity to retroactively issue benefits for August and September 2020).<sup>8</sup>

## Authorization for Full 2020–21 School Year Benefits

Although many states across the country were beginning the school year in a completely virtual or hybrid format, there was initially no congressional authority to provide for P-EBT benefits past September 2020. At the beginning of October, Congress passed the Continuing Appropriations Act, 2021 and Other Extensions Act that established a P-EBT program for SY 2020–21 to assist the millions of children still losing access to free or reduced-price meals while schools bounced between remote, in-person, and hybrid teaching models.<sup>9</sup> The new authorization required states to determine student and school attendance patterns as the basis for establishing benefits and also directed the USDA to consider simplifying assumptions when approving state plans for P-EBT benefits. The legislation specified that “a State agency may use simplifying assumptions and the best feasibly

available data to provide benefits to and establish benefit levels and eligibility periods for eligible children,” however, this guidance did not account for constant changes in school and student attendance status. This bill also expanded P-EBT to cover children younger than age 6 in child care who had lost access to meals in child care settings because of program closures or reduced availability. However, the original legislative language was nearly impossible to implement as states did not have any data to track child care status, and FNS did not issue guidance to states on how to interpret the modifications, simplifying assumptions, and details around providing benefits to children under age 6 until five weeks later.

On November 16, FNS released a new plan template and guidance for states to submit SY 2020–21 plans.<sup>10</sup> Notably, this occurred well into the school year, even for those districts that had implemented a delayed start date. The guidance took a stricter approach to the use of simplifying assumptions than states were hoping for, which many states found challenging to apply. For example, states were still required to monitor the operating status of individual schools and the duration of closures/reduction in attendance/hours for the purposes of determining benefit amounts rather than being able to simplify at the school district level. See table 1 for additional information as to how P-EBT eligibility criteria and reporting requirements differed between spring 2020 and SY 2020–21. The guidance also indicated that FNS would not accept plans to issue P-EBT benefits for children under age 6 in child care at that time because of the effort’s complexity. Given the timing of the guidance release, no state plans were approved for SY 2020–21 before mid-December 2020, and as a result, most students eligible for P-EBT did not receive any benefits during the fall term other than those in the limited number of states where August/September 2020 benefits were issued. The first P-EBT plan for the 2020–21 school year was approved on December 15, 2020, in Massachusetts (see figure 1 for a map of state plan submissions).

## Additional Clarifications by Congress and FNS in Winter 2021

Although the October legislation had provided the use of simplifying assumptions to mitigate data complexities and gaps in information that states were encountering, many states found the November guidance from FNS narrower than expected in its interpretation of how they could use assumptions to craft a benefit program. In late December 2020, Congress passed the Consolidated Appropriations Act, 2021,<sup>11</sup> which explicitly emphasized that states could use simplifying assumptions to establish benefit levels for SY 2020–21 and further clarified that states could use a state or local public health

ordinance developed in response to the COVID-19 pandemic to determine if a school is closed or operating with reduced hours. The bill also significantly simplified the process first spelled out in the October legislation for states to establish eligibility for young children in child care (see appendix B for more information).

Although a handful of states submitted plans following the late December congressional guidance, many states waited for further direction from FNS on how to navigate the criteria for determining school attendance status and benefit levels. On January 29, 2021, the new administration's FNS released another round of guidance for states. This guidance was different from previous rounds and included an all-new template for state plan submissions, clarified additional simplifying assumptions states could make, and explained exactly what states needed to cover in plans providing benefits to children under age 6.

## Summer EBT and Beyond

In March 2021, Congress passed the American Rescue Plan Act of 2021 (ARP),<sup>12</sup> which extended P-EBT benefits to include the summer of 2021 for school-age children eligible for free and reduced-price meals and eligible children under age 6. As all schools and child care facilities were deemed closed during the covered summer period, states did not have to reference operating status in their plans, which greatly streamlined the benefit determination process. The ARP also authorized P-EBT for any future school year affected by COVID-19 and the summer thereafter and expanded the child-under-6 component of P-EBT to include Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands. In late April, FNS released guidance and plan templates for summer P-EBT, with the recommendation that all states allot a fixed, 55-day standard benefit.<sup>13</sup> At the time of this report, FNS was in the process of finalizing guidance for P-EBT for the 2021–22 school year.

TABLE 1

Comparison of Eligibility Criteria and Reporting Requirements for State P-EBT Plans for SY 2019–20 and SY 2020–21

P-EBT for SY 2019–20	P-EBT for SY 2020–21
<b>Child Eligibility</b>	
<p>The child, who if not for the closure of their school during a public health emergency designation and due to concerns about a COVID-19 outbreak, <b>would receive free or reduced-price school meals</b> under the Richard B. Russell National School Lunch Act, as amended.</p>	<p>Eligibility criteria were more specific in SY 2020–21, including children who are</p> <ul style="list-style-type: none"> <li>▪ directly certified or determined “other source categorically eligible” for SY 2020–21; <b>or</b></li> <li>▪ certified by application; <b>or</b></li> <li>▪ directly certified, determined categorically eligible, or certified by application in SY 2019–20 <b>and</b> the school district has not made a new school meal eligibility determination for the child in SY 2020–21.</li> </ul> <p>The criteria also include children enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3.</p>
<b>School Status Eligibility</b>	
<p>The child’s school or district will be (or has been) closed for at least 5 consecutive days during a public health emergency designation and due to concerns about a COVID-19 outbreak.</p>	<p>In SY 2020–21, the school or district could have been either closed <i>or</i> operating with reduced attendance or hours to reflect hybrid learning.</p>
<b>School Status Reporting Requirements</b>	
<p>All states were able to use</p> <ul style="list-style-type: none"> <li>▪ an average date for the end of school closures and/or</li> <li>▪ an average number of canceled school days to issue benefits.</li> </ul>	<p>States had to confirm additional details around just end date and canceled school days. They had to confirm the school has been closed or operating with reduced attendance, collect updated information from schools, at minimum, every other month, and make a plan for monitoring changes in eligible school status.</p>

**Source:** For 2019–20 guidance, “SY 2019-2020 P-EBT State Participation,” US Department of Agriculture, Food and Nutrition Service, last updated February 1, 2021, <https://www.fns.usda.gov/snap/sy-2019-2020-pebt-state-participation>. For 2020–21 guidance, “P-EBT State Plans for School Year 2020-21,” US Department of Agriculture, Food and Nutrition Service, last updated November 16, 2020, <https://www.fns.usda.gov/snap/p-ebt-state-plans-sy-20-21>.

**Note:** SY = school year.

# Findings

## Insights from Initial P-EBT Implementation: 2019–20 School Year

Though this report will focus on P-EBT implementation in SY 2020–21, a short background about challenges encountered during the spring 2020 school year benefit issuance period provides helpful context for understanding what states had been navigating from the program's inception. This is not a comprehensive list of challenges and lessons learned; for more detailed information on P-EBT implementation in spring 2020, see the Center on Budget and Policy Priorities and the Food Research and Action Center's joint P-EBT documentation project.<sup>14</sup>

The initial goal of P-EBT was simple—to provide free or reduced-price meal eligible school-age children and their families with food benefits to replace the loss of school meals during nationwide closures in the spring of 2020. Though optional, all states, the District of Columbia, and the Virgin Islands had submitted a P-EBT plan by early July 2020 to provide this emergency assistance to families in need (although the final state did not have an approved plan until mid-August). P-EBT was a new program and required a new collaboration between SNAP agencies and authorities responsible for school meal programs. The school meal programs are administered by separate state agencies, which, in many states, do not collect statewide program data in a centralized system. This means that any specific data about students or schools must be collected individually from each school or district.

Given this unprecedented rapid response and the need to stand up a new program with minimal planning time, the implementation of P-EBT for SY 2020–21 was uneven. Early implementation was slow due to a host of implementation and technical challenges, including a shortage of EBT cards in response to supply chain issues, a lack of administrative funding that affected staffing decisions, competing demands on state administrators, and disruptions in on-site service. This drain on resources was particularly intense for both state SNAP administrators and school personnel who were facing a myriad of other pandemic-related challenges in SNAP administration programming. Due to a lack of designated staff to support P-EBT implementation, several state SNAP administrators took on the role and worked well after midnight to reconcile inaccurate data. Ultimately, standing up an entirely new program in a short time span required a significant portion of their time.

Further, states were uncertain about how to inform parents, especially those who were not previously enrolled in SNAP and were unfamiliar with receiving assistance in the form of an EBT card. While many states had some sort of public awareness campaign or tried using social media to notify parents about this benefit, the speed with which benefits needed to be delivered didn't leave much time for providing sufficient notice to families. There were also significant concerns of a chilling effect on P-EBT redemption of benefits among immigrant families who might be wary of participating due to fear of public charge rules (although P-EBT is not subject to public charge, its similarity to SNAP may have added to the confusion).

And finally, one of the main challenges manifested in benefits actually reaching eligible children and their families. The easiest way for states to administer benefits was through direct certification, in which P-EBT benefits would be issued directly to families using data from schools and education agencies without requiring any additional action/applications. However, due to insufficient capacity to match new free and reduced-price meal application data between school meal programs and SNAP agencies—two programs that have limited connecting infrastructure—many states couldn't directly certify all eligible households. In 25 states, at least some parents were required to apply for P-EBT, detailing head of household, address, the child's name, and other basic information.<sup>15</sup> This lack of data quality extended to incorrect addresses, which included a host of considerations with whom the child was living with (if their parents were separated, if in foster care, if their residential address for school differed from their current residence, etc.). The inability to resolve all of these issues inevitably caused a large number of cards to be returned.

## **Changes Made and Lessons Learned**

While it's important to note that P-EBT during SY 2019–20 and P-EBT during SY 2020–21 are, in essence, two completely different programs, states were still able to apply some learnings from their initial implementation to guide P-EBT implementation in SY 2020–21. For example, some states initially issued benefits in the parent/guardian's name, but there were several issues around noncustodial guardians needing to receive the benefits if the child didn't live with their biological parent or guardian. These dilemmas around custody and who should receive benefits led some states to decide to issue subsequent benefits in the child's name instead. Other helpful lessons learned involved being able to anticipate certain issues ahead of time; for example, anticipating data issues, some states did more education/training with schools to increase communication with parents about updating their addresses. Though limited in bandwidth and capacity, a few states were also able to work during the summer to build online portals so households could log in and update their

information—however, the majority of school and SNAP staff were stretched so thin that this type of infrastructure building was out of reach.

This lack of capacity in itself was also a helpful learning opportunity—SNAP agencies and school staff were overwhelmed with calls from families, and larger states found they couldn't manage the volume of data on their own, so several states anticipated this in P-EBT for SY 2020–21 and outsourced certain activities like data management and call centers to external vendors. The results of our December 2020 rapid response survey showed that half of respondents (15 out of 30) planned to either hire or contract new staff for P-EBT implementation. We describe the challenge of state capacity and outsourcing constraints in more detail in the Internal Challenges section.

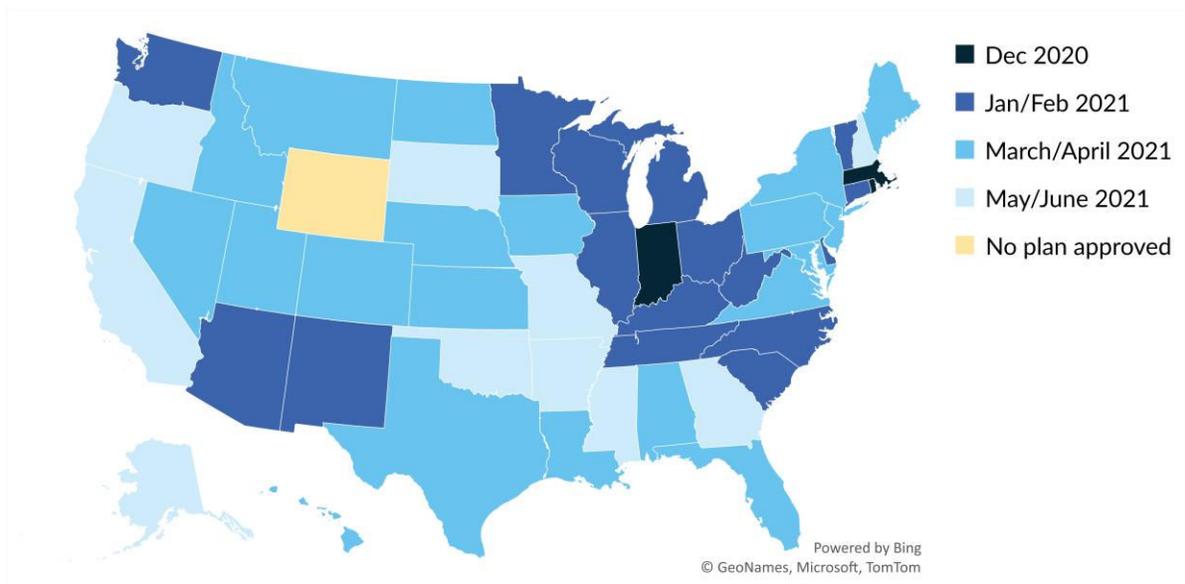
Finally, a great deal of the challenges that presented in the SY 2020–21 implementation were a result of uncertainty. Because states thought that this program was a temporary stopgap measure, they didn't build the necessary infrastructure needed to support ongoing administration. Many states remarked in focus groups that had they known the program would continue past spring and summer 2020, they would have put more effort into building data systems rather than continuing to rely on the initially developed work-arounds.

## P-EBT for the 2020–21 School Year

This report primarily focuses on the assessment of the key challenges states encountered in implementing P-EBT for SY 2020–21. We examine both external challenges arising from decisions and processes occurring at the federal level and internal challenges emerging from a lack of infrastructure and capacity within the states. Because state decisionmaking is influenced by external events, we first examine the actions taken at the federal level that shaped the timing of program implementation and contributed to a lack of clarity on how the program should be administered in the face of shifting conditions and serious data limitations.

FIGURE 1

SY 2020–21 School-Age P-EBT State Plan Approvals by Month as of July 2021



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**Source:** “State Guidance on Coronavirus P-EBT,” US Department of Agriculture, Food and Nutrition Service, accessed July 7, 2021, <https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>. Not pictured are the US Virgin Islands, approved in June 2021; the Northern Mariana Islands, approved in April 2021; the District of Columbia, approved in March 2021; and Puerto Rico, approved in January 2021.

## External Challenges

### ISSUES WITH TIMING OF GUIDANCE FROM FNS

States reported that two external factors impeded their ability to get benefits to families in a timely manner: delays in congressional authorization for a full SY 2020–21 program and a lack of timely and clear FNS guidance about how to implement P-EBT. For states to be ready to implement a school year program, submit the required state plan for FNS approval, and initiate benefit issuance so that all eligible students could receive benefits early in the school year, congressional authorization would have needed to be in place during summer 2020. FNS guidance would have needed to follow shortly thereafter, based on the experience of states involved in earlier summer EBT pilot programs that implemented a much simpler design.<sup>16</sup> Unfortunately, as stated, SY 2020–21 had already begun before Congress authorized a full school year plan.

Although communication from FNS in mid-August 2020 alerted states that they could opt into an August/September 2020 extension of their existing P-EBT plan to cover the transition into the new

school year, only some states were able to adopt this extension due to the strict requirements; states needed to submit a plan, obtain approval, collect data, and issue benefits all by September 30. One state in our focus groups described wanting to expand benefits in this time period but not being able to due to the unrealistically tight time frame, and it reported experiencing significant negative feedback from advocates and families for being unable to issue benefits in those months. Several other states reported that they undertook efforts to apply but couldn't finalize a plan in time. Though families ultimately could receive benefits for the beginning of the school year under the later SY 2020–21 extension, this lapse was one of several significant delays.

With the passage of the Continuing Resolution on October 1,<sup>17</sup> states finally had authorization to develop a plan that could address the full school year. Unlike P-EBT in spring 2020 when schools were uniformly closed or open due to the pandemic, states were directed to determine eligibility and benefit levels based on specific circumstances around school attendance patterns, which varied widely and often shifted at the district, school, grade, and classroom level. While fully in person, hybrid, and fully remote were the most common learning models, states had to contend with several unique situations. For example, in some states, parents could opt into fully remote learning regardless of what learning model the school was implementing. In addition, outbreaks of COVID-19 would mean that one classroom or grade level might have to quarantine for two weeks while the rest of the school remained in a full or hybrid format. These nuances all had implications for access to school meals, meaning states struggled to think through how they could manage the complexity and still issue benefits quickly and accurately.

Legislative details on how to craft a manageable benefit administration plan were extremely limited, although it was clear that the approach for P-EBT in SY 2020–21 was very different from the initial spring implementation given the need to tailor the program to school attendance. States needed to quickly formulate a new approach and gather data on whether students were learning remotely or in person; however, these data often didn't exist. State concerns about data prompted Congress to direct the USDA to consider "simplifying assumptions," which were meant for states to be able to use their best feasibly available data and standardize benefits to a certain extent rather than accounting for constant changes in school status. Through calls with APHSA and state SNAP agencies immediately after the legislation was released, states expressed significant concerns about data availability; several noted that their own state Department of Education (DOE) wasn't currently collecting information on what learning model schools were using (i.e., fully in person, hybrid, or fully remote). Many states were hoping to leverage simplifying assumptions to their full extent—for

example, administering a half-benefit for students in hybrid learning environments rather than a range of benefit levels depending upon the variable hybrid formats being adopted.

States also expressed a lack of understanding of how the newly added benefit for children under age 6 missing meals due to child care closures could be implemented. The guidance received was nearly impossible to implement given the lack of data to track child care status, and states required a great deal of clarification to move forward. For more information about the implementation of benefits to children under age 6, see appendix B.

Overall, most states perceived that they needed to essentially “sit and wait” until FNS released additional guidance. FNS ultimately released additional guidance on November 16, 2020, which included a template for states to use their plan submission and a set of Q&As. At the time, the USDA indicated it would not be accepting state plans to issue benefits for children under 6 in child care due to the complexity of that effort. (See appendix C for more information about P-EBT for children under age 6.) This guidance detailed requirements around how often states would be required to collect data (every two months) and limited the use of simplifying assumptions (described in more detail below in Developing Simplifying Assumptions and Obtaining Plan Approval). In general, states found the documents to be unclear and easily misinterpreted, making it difficult to actualize plans for submission.

States and advocate groups pushed for Congress to further clarify legislative intent around the flexibility to use simplifying assumptions and the new benefit for children under age 6. In the interim, many states felt torn between the need to wait for clearer information and the prospect of submitting a plan with suboptimal approaches to try to assist families sooner. Ultimately, only three states were able to secure a plan approval to provide SY 2020–21 benefits in December 2020: Massachusetts, Rhode Island, and Indiana. These were relatively small states, and although states were eager to learn from each other, the early adoptees couldn’t necessarily provide a clear road map for larger states facing much larger student populations and greater on-the-ground complexity.

Language addressing simplifying assumptions and benefits for children under age 6 was finally included in legislation passed just before the end of the 2020 calendar year. This action coincided with the transition period from the Trump administration to the Biden administration. Therefore, follow-up guidance was not released until January 29, 2021—halfway through the 2020–21 school year. The January 2021 guidance provided states additional details and marked a new phase of P-EBT implementation. Some states remarked that the shift ushered in a phase of increased and clearer communication. However, the transition inevitably contributed to further delays in administering P-EBT, as FNS was working to give states a *new* plan template as well as reviewing and debating aspects

of plan submissions with state administrators. Ultimately, large states like New York and California still struggled to craft a feasible plan that FNS would approve and did not receive official approval until April and June 2021, respectively. As a result, many students did not receive any benefits for the school year until it was already ending.

One state administrator remarked that it's impossible to create an entirely new benefit program in less than a year, and thus the need to move quickly, combined with the start and stop nature of program authorization and guidance, inevitably led to inadequate program infrastructure. Overall, several states shared the sentiment that had they had sufficient lead time to plan for an entire school year in advance, they could have invested time into building better data infrastructure. One state administrator commented that they "just feel like we're always catching up" rather than being able to focus on their main goal of getting benefits to families when they needed them.

#### DEVELOPING SIMPLIFYING ASSUMPTIONS AND OBTAINING PLAN APPROVAL

Following the passage of the October 2020 legislation providing for the use of simplifying assumptions in creating a state P-EBT plan, states began exploring strategies to streamline the data requirements to address the serious shortcomings in available information.

##### ***Why States Sought Simplifying Assumptions in P-EBT Plans***

Many states did not have centralized databases that could track individual student attendance. In many cases, data on learning models used by individual schools or school districts weren't systematically available from state education agencies and often had to be collected through a time-consuming process using individual spreadsheets including tens or hundreds of thousands of students and a lengthy data-matching process. States were acutely aware that the absence of readily available data would lead to significant delays in not only plan submission but also plan approval and ultimately issuing benefits. Before guidance was released, some larger states started thinking through how to collect data about school models and were hoping simplifying assumptions would extend to the use of existing state guidelines that more broadly marked regions as in person or fully virtual based on COVID-19 positivity rates.

Overall, states had anticipated greater flexibility from the FNS guidance than was communicated in November 2020, which outlined a narrower use of acceptable assumptions. The November guidance signaled that states would be required to identify, confirm, and monitor the status of individual schools as well as the duration of closures/reduction in attendance or hours. As a result, states that anticipated using simplified assumptions about school learning models needed to go back

to the drawing board on their initial approaches. For example, faced with a lack of any systematic data on individual school learning models, one state originally explored relying on regularly updated public health ordinances at the county level as a means of determining which districts were unlikely to provide in-person instruction and thus where students could be expected to qualify for a fully remote benefit level. However, it became clear that this strategy for designating remote status areas would not meet the USDA's requirements.

One state administrator remarked that they sought input from its FNS regional office about simplifying assumptions and were told that it should just submit their proposal to FNS and see how it was received. Lacking clarity on what might be considered reasonable made it more difficult for states to move forward in building out their internal infrastructure to support future administration of the program for SY 2020–21. Decisions needed to be made so that systems personnel could build the capacity to issue benefits according to the approved process. Also, data requirements needed to be communicated in advance to DOEs and school district personnel if there would be an expectation to collect, clean, and upload individual student-level data to the state SNAP agency on a regular basis.

### ***Simplifying Assumptions Related to Attendance Patterns across Schools and Learning Models***

In response to continuing confusion over what types of simplifying assumptions would be considered acceptable by FNS, APHSA staff facilitated conversations with state SNAP agencies to identify potential simplifying assumptions. For example, one type of assumption focused on establishing a standardized monthly benefit amount based on the average number of school days expected in the predominant learning model (i.e., fully remote or hybrid) so that states would not have to attempt to collect daily student-level data on number of days in school each month. Using this more standardized approach, a state could, for example, propose to issue a “fully remote” benefit to equal an average of 18 days of benefits a month and an average “hybrid” benefit to equal a lower number of benefit days a month (e.g., 10 days) to account for part-time in-person attendance. Although the wording of the November guidance Q&A affirmed this approach, this simplification still required a great deal of justification on the part of states as to how they arrived at their average number, meaning they needed to collect the types of individual school-level data they were having trouble accessing.

Ultimately, states were able to use this approach of establishing standard benefit levels, which they found to be one of the more helpful simplifying assumptions from FNS. However, often there was a great deal of detail and justification needed behind the proposed assumption. Moreover, these challenges existed even though the December legislation was amended to say that states would be able to develop simplifying assumptions at the state or regional level.<sup>18</sup> For example, one state

proposed administering a single standard benefit for all schools that were fully remote and a single standard benefit for all schools with hybrid schedules. It calculated the fully remote benefit by dividing the total required school days in the year for that state (175) by the number of months (10) and landed on 17.5 days per month, rounded to 18. The rationale of having a standard each month would be that it's easier to message to families and ensures consistency of benefits for families relying on this benefit to help feed their children. The state's hybrid benefit relied on using the most common learning model in the state, which was two days a week in person and three days a week remote. Though ultimately approved, FNS required additional justification around how exactly the state decided the two days in-person/three days remote model was the most common. Table 2 provides an example of how one state had to provide school-level tabulations in its plan to justify its use of a standard benefit for students in hybrid learning across the state.

**TABLE 2**  
**Example of Justification Required in SY 2020–21 P-EBT Plans around Simplifying Assumptions for Predominant School Models**

Month	Hybrid: 2 days in person and 3 days remote	Hybrid: 4 days in person and 1 day remote	A/B hybrid: alternate weekly between in person & remote	Grade-level staggered schedules
September	500 schools	100 schools	205 schools	100 schools
October	600 schools	100 schools	200 schools	105 schools
November	550 schools	35 schools	100 schools	80 school
December	500 schools	30 schools	100 schools	90 schools
January	600 schools	100 schools	200 schools	105 schools

***Simplifying Assumptions Related to Attendance Patterns within Schools and Learning Models***

Simplifying assumptions around the predominant attendance model for each school had a similar main purpose—to minimize the need to collect individual student-level information. This was particularly helpful in instances where a school might be closed or hybrid but certain groups within the school still reported full time in person (e.g., students in a vocational program, or programs for students with special needs who have a different in-person schedule). In addition to simplifying the level of data schools would have to transmit to the state agency, treating all students in a given school as having the same status based on the predominant learning model could have the additional benefit of helping states avoid confusion for parents. We heard from states that parents would often call in to ask why their child received a different benefit than another student in the same class or grade. This simplified approach would also be less error prone due to shifting individual circumstances. States were successfully able to propose this simplifying assumption as it was much easier for states to follow this

route instead of proposing individual student-level benefits. Ultimately, however, while states didn't need to collect individual student-level data, it was still difficult to obtain even school-level data, and the burden of individual student/school identification remained if a school or grade closed to quarantine or if a student opted for virtual learning while in a fully in-person school.

### ***Simplifying Assumptions Related to Eligibility Data***

Finally, states explored ways to use simplifying assumptions to help expedite determinations for which students were eligible for P-EBT in SY 2020–21. While the guidance confirmed that states could use the prior spring's P-EBT roster to administer benefits for the 2020–21 school year, it also stipulated that states needed to be able to identify newly eligible students who hadn't previously received P-EBT in spring 2020 or weren't currently enrolled in SNAP but were still eligible for P-EBT. This also included keeping track of children who graduated or switched schools. The guidance strongly encouraged states to use their established school meal application processes and direct certification systems to identify these new students. However, applications had the potential to miss a great number of eligible families who may not have known where to apply or that they were eligible. Moreover, processing applications was very cumbersome, so states sought flexibility to use proxy data to identify some of these students. The need for applications was also due to not all school districts collecting updated 2020–21 free or reduced-price meal information from parents due to USDA waivers in place during the pandemic (see Eligibility Data Collection and Management for more information about this challenge). To simplify, then, states that lacked comprehensive 2020–21 school meal application data could propose that they'd use 2019–20 P-EBT data to identify students who received P-EBT in the prior year and combine this information with updated direct certification data from 2020–21 to attempt to fill the gap for any children not identified under the previous eligibility mechanisms.

Overall, several states went back and forth with FNS on the topic of simplifying assumptions. Many state administrators and school officials reported that they felt the term "simplifying assumptions" was a misnomer, and one remarked that they were anything but simple.

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*"Simplifying assumptions were anything but simple."*

*—State P-EBT administrator*

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### ***Complexity of the Plan Approval Process***

States also engaged in a lot of back and forth with FNS to get their plans approved. Often, before even submitting a plan, states would spend weeks engaging with FNS to clarify questions that the guidance may not have answered and to ensure they were building a plan that followed guidelines. However, upon submittal, one state remarked that despite their weeks-long process of checking in with FNS beforehand, the approval process still took three to four weeks. In a rapid response survey conducted in July 2021, 14 out of 29 states reported that it took approximately three to eight weeks after plan submission to get an approval from FNS, with 2 states reporting the process after submission took over two months. The plan submission and approval process was often particularly lengthy for states with large numbers of eligible school-age children, in large part due to the significant data collection challenges they faced to conform their plans to what would be acceptable by FNS. Many of these states did not obtain approval for their 2020–21 school plan until the spring or summer of 2021.

In some cases, states felt that exchanges with FNS could have been streamlined and the process for approval expedited. For example, one state described needing to provide confirmation of several points already included in the submitted plan. In these cases, the administrator was simply reiterating what was already written in the plan. This state noted that in other FNS programs, a state plan template sometimes includes check boxes for state administrators to affirm and certify that the approach outlined will be implemented as described. By adopting a similar template for P-EBT with feasible options that states could select from, some of the back and forth between states and FNS personnel reviewing the plan could potentially have been avoided.

Moreover, the approach taken by FNS to approve simplifying assumptions was on a state-by-state basis. Essentially, this meant that some assumptions approved in one state may not be approved in another based on the interpretation of the states' use of "best feasible data." Thus, approved plans often couldn't be used as a road map for other states struggling to put their plans together. The design of P-EBT inherently put the onus on states to develop their own approaches without guidance on how exactly to implement and with little deference to accept reasonable approaches proposed by states. Without a clear and common understanding of what was acceptable, this was very difficult for state planning.

The lengthy discussions over whether justifications for proposed assumptions were sufficient, the expectation by FNS to provide extensive documentation only to disallow state proposals, and FNS requiring confirmation after plan submission of components that were already explained came at the expense of timely issuance of benefits to students. The November 2020 guidance also mentioned that

states had the ability to prospectively issue benefits, that is, award benefits in advance of the benefit month (limited to two months at a time). The same guidance also made it clear that states would have to assume responsibility for monitoring changes in school operating status and make necessary adjustments to prevent improper payment of benefits, an additional data collection burden on an already stressed system. While prospective benefit issuance would have been a desirable approach, the timing of guidance from FNS and the level of documentation required for plan content and data collection drove all states to a retroactive benefit issuance approach. Retroactive issuance ultimately lengthened the time between when families needed assistance and when they actually received it. Overall, the back-and-forth process to get plans approved caused crucial delays in getting benefits to families.

#### ADMINISTRATIVE FUNDING AND CONSTRAINTS

The last major area of external constraints for states was a lack of timely administrative funding for P-EBT. As described, spring 2020 P-EBT did not provide for full administrative funding for staff working to implement this program; instead, it was treated as other SNAP programs in which the USDA would reimburse 50 percent of states' administrative costs and states would pay the remaining 50 percent of investments. This in and of itself was a logistical difficulty, as both SNAP agency staff members and school nutrition staff were dedicating a great deal of time to this program. Given that states must plan their budgets in advance, and P-EBT in spring 2020 was a completely unforeseen and additional cost, states weren't able to sufficiently cover the costs of implementation. Moreover, there no was no preexisting mechanism to reimburse child nutrition agencies and their local schools for the extensive data collection needed to support implementation.

This changed slightly for SY 2020–21. In October 2020, the Continuing Resolution allowed states to receive a 100 percent reimbursement of necessary, allowable, and reasonable administrative costs related to P-EBT administration via a grant format.<sup>19</sup> This meant that states needed to provide an estimate of how much funding they'd need through a specific form, deviating from the normal funding application process for other SNAP programs. While this was very helpful and appreciated by states, in reality, administrative funding took a great deal of time to reach states. Because of this, states needed to spend money up front to cover costs of contracts, staffing, and other required costs before they ultimately received funding. This was particularly problematic in some state environments, especially as many states were already struggling financially during the pandemic and experiencing hiring freezes.

In creating a P-EBT plan, states often mentioned needing to solidify contracts with external vendors (predominantly with EBT vendors to make and send benefit cards to families) and call centers

and to expand staffing to hire additional skilled team members. Hiring staff was particularly difficult, as states found it difficult to hire and make time to train skilled, full-time staff for what was functioning as an episodic program. Putting together contracts, especially in large states, was also difficult and took time and advance payments; a state administrator reported that the broader public perception that “once a plan was approved, the state could start issuing benefits right away” was not born out by the realities on the ground. One state official mentioned needing to use staff from other departments, and others commented on the intense burnout they faced.

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*“People ran themselves into the ground running this program. You could only do so much.”*  
—State SNAP administrator

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State administrators commented that full reimbursement of administrative funding wasn't a magic fix by any means and funding needed to reach states much quicker. Moreover, states didn't always receive the full amount they applied for or received the amounts in multiple payments even though they were told they'd receive a full reimbursement. As of midsummer 2021, many states were still waiting to receive funding they had requested several months earlier. Additionally, the structure of requiring states to account for a gamut of shifting costs up front through grant agreements was difficult. While FNS did grant some flexibility to states to amend their grant agreements at a later date based on revised costs, this model of managing administrative funds did not reflect the reality of how the program was rapidly evolving.

Many states were hindered by this lack of timely funding. It is important to note that the burden and cost of implementing this program fell not only on state SNAP agencies, though they were the conduit in the eyes of FNS, but also on school systems and the state DOE. States recognized this early on and thought it would help for administrative funding to go directly to both parties, but setting up this infrastructure was difficult. FNS only alerted DOEs after the December legislation that schools could be funded directly rather than through SNAP agencies. There was a great deal of confusion around this process even after the guidance was established, and many school systems were operating without reimbursements. The process for passing administrative funds from one agency to another was also complex. One state P-EBT administrator commented that while they tried to award funding to their DOE, the DOE did not want to accept it as they felt that SNAP should have full ownership of the program. We delve further into this relationship between SNAP agencies and schools/school districts in *Coordination between State and Local SNAP and Child Nutrition Stakeholders* below.

## Internal Challenges

While the federal environment contributed to significant delays in implementing P-EBT for SY 2020–21, each state contended with its own set of internal challenges as well. These included serious problems with data collection and data quality, lack of permanent infrastructure to issue benefits, staffing constraints, and the complex relationships between SNAP agencies, state DOEs, and schools. We describe each of these challenges below and provide a summary of what was required of states to provide context on what exactly posed each challenge.

### DATA COLLECTION AND DATA QUALITY

States participating in focus groups identified collecting quality data as one of the most pressing barriers in administering benefits. Having accurate data was the sole mechanism by which states could know which children needed benefits, how much they needed, and how to get the benefits to them. Without quality data, none of this would be possible. For SY 2020–21 P-EBT issuance, at minimum, states were required to collect the following data:

- Student free or reduced-price lunch (FRPL) eligibility either through school meal applications, “other source categorical eligibility” via direct certification such as receipt of SNAP, Temporary Assistance for Needy Families (TANF), and so on, or enrollment in a Community Eligibility Provision (CEP), Provision 2, or Provision 3 school.
  - Must be currently enrolled; that is, if using SY 2019–20 data, must exclude students who have graduated or are no longer eligible
- Correct mailing information for students, including those without information in the state’s system if they’re not already receiving SNAP<sup>20</sup>
- School status/learning model of P-EBT-eligible students, updated, at minimum, every two months

### ***State Barriers to Information Sharing between SNAP and Education Entities***

In the early months of the pandemic, some states had faced immediate challenges with state laws that limited or prohibited sharing identified student information with other entities, including SNAP agencies. These rules were designed to protect student and family privacy but had the unintended consequence of delaying a rapid response. One state shared that it had to seek a legislative solution to permit data sharing; although the state felt that all parties moved quickly to address this challenge, it still took approximately two months to resolve before the data-gathering process needed to initiate the first round of P-EBT benefits. Limitations around data sharing also led to some states concluding

that schools had to pass student-identified data directly to the state SNAP agency rather than through the state DOE. This contributed to the cumbersome and time-consuming process of collecting spreadsheets from individual schools, as discussed more fully below.

### ***Eligibility Data Collection and Management***

Starting with eligibility data, states needed to certify that students were eligible to receive free or reduced-price meals before the pandemic. They could do so by either determining the student was (1) FRPL eligible or (2) directly certified via other categorical eligibility because of enrollment in another qualified program. For FRPL eligibility, states were encouraged to use updated SY 2020–21 FRPL rosters to administer benefits. Students were also directly issued benefits if they were enrolled in a universal free meal school (schools participating in CEP, Provision 2, or Provision 3), meaning all students in the school receive free meals. A large portion of students were able to be captured through the categorical eligibility and what is known as the direct certification process, in which households receiving SNAP benefits would automatically be deemed eligible to receive P-EBT benefits. Other categorical eligibility criteria that states could use to directly certify families, depending on state guidelines, included receipt of TANF, Medicaid participation, and children living in foster care.<sup>21</sup>

However, one of the major hiccups in this process was that the USDA enacted other important waivers during the pandemic that removed the necessity for families to complete FRPL applications for SY 2020–21.<sup>22</sup> This change made it easier for schools to provide meals or grab-and-go meals to all students during the pandemic, which reduced administrative burden on schools and parents while also promoting broad access to school meals. As a result, many schools opted not to collect and process FRPL applications at the beginning of the new school year as the process would be complicated due to the use of fully remote instruction models in many areas. While the new flexibility offered important advantages, it did make it more challenging for state agencies to assemble up-to-date data on FRPL-eligible children. Because of this constraint, many states relied primarily on SY 2019–20 data for FRPL determinations and had to develop special mechanisms to remove students who had graduated the prior spring or had left the school system for other reasons. To maximize P-EBT access for new students or for those whose families were newly eligible in SY 2020–21, FNS required states to make P-EBT applications available to these households. This requirement was important for serving families in need but did add to the processing burden in some cases.

In addition to having an incomplete roster of eligibility data, the quality of student data posed issues as well. Traditionally, school meal applications ask parents to complete a roster of their children and indicate their school and grade; attest to participation in certain benefit programs, if applicable;

and report household gross income by source and include a signature of an adult household member. Contact information, including a home mailing address, was often treated as optional and was not separately verified or updated regularly throughout the school year. States subsequently found that for a host of reasons, schools didn't always have the correct mailing address for a child. In some cases, a parent might have intentionally used an incorrect address to account for district boundaries. Or school nutrition files might include an address for a biological parent but not have up-to-date information about foster care placements or informal kin care arrangements. Low-income households often experience more mobility, which made it difficult to keep track of new address information, and during the pandemic, household compositions sometimes shifted based on loss of employment or the need to protect vulnerable family members from exposure.

A state education official echoed the difficulty in maintaining accurate addresses for certain students during the pandemic, especially those whose parents were migrant farmworkers. In some cases, parents might be reluctant to notify districts that their child was no longer living in the district or even the state. Shared custody arrangements also presented additional complexity in determining where household benefits should be sent, as states discovered in P-EBT implementation in spring 2020. Finally, updating school information was just not a primary priority for a parent navigating their child through a global pandemic. In fact, school food authorities sometimes maintain databases with school meal eligibility data that are altogether separate from school enrollment data, so if the child's school enrollment records are updated afterwards with any address changes, it may not be reflected in the school meal database. We heard from states that this lack of ability to match data contributed to additional challenges in getting current and updated address information for eligible students.

In contrast to the administration of on-site school meals, which aren't dependent upon household address information, state SNAP agencies are familiar with rigorous attention to data quality to support benefit issuance. Having accurate household-level information is central to state SNAP operations. Because of this large disconnect between the data approaches in the two sectors, SNAP agencies inevitably grew frustrated with the large amount of data quality issues, as the lack of reliable addresses was a major barrier in getting benefits to parents. This issue was echoed in our focus groups with SNAP and state education officials alike. State education officials discussed some of the hurdles from not only parents not updating their information but also school districts inputting data incorrectly. For example, one state administrator mentioned that a few large school districts in their state inputted a January 1 birthdate for all the children because collecting all birthdates individually would be too difficult, but this unknowingly prevented households from being able to pin their cards and use their benefits as activation PIN numbers used the child's date of birth. Another state education official described legal constraints that prevented them from updating addresses for

students at the state agency level and remarked that all updating “...has to be done at the local level. When a parent calls the center to update the address, we have to send them back to the local level. If the school doesn’t know what to do, they send them back to us. It’s a horrible customer service experience.” Issues like this popped up at every stage of the process due to the speed with which this program needed to move forward and the lack of streamlined communication between schools, education agencies, and SNAP agencies.

Data management proved to be extremely difficult across states. State education and local school information systems were not constructed to house data with the level of integrity needed to run the program as outlined in federal guidance, so education administrators had a lot of difficulty getting data systems and dashboards up and running. Education officials described the data process as extremely intensive, and school staff were already very strained by competing demands during the pandemic. Without any additional resources to support P-EBT up front and staffing already stretched thin, getting a new data system to collect, clean, and maintain student-level eligibility up and running in a timely fashion was next to impossible.

#### ***School Status Data Collection and Management***

The most challenging component of data collection, however, was not student eligibility information but instead tracking individual school status and learning model. FNS guidance for P-EBT issuance required that states collect data on school learning models and update this, at minimum, every two months—that is, whether each child was learning in person, remotely, or under a hybrid model for the two-month period. In most states, the infrastructure to gather these data just didn’t exist—centralized databases for this kind of information were very uncommon, and DOEs were not set up to collect and monitor these types of data. Moreover, since the initial implementation in spring 2020 didn’t require information about school learning status as all schools were essentially closed at the time (table 1), schools had no experience meeting this requirement for P-EBT in SY 2020–21. A simplifying assumption was approved where all students in the same grade level or school could be labeled as having the same school status rather than needing to administer benefits according to each individual student’s learning mode. This made it easier to document school status. However, the school still needed to account for children who opted for virtual learning in open or hybrid learning schools, as well as any outbreaks that would require a two-week quarantining period, so there was no way to escape addressing the need for individual-level data.

Several states whose schools didn’t have these data had to resort to using Excel spreadsheets to document learning models of students each day, meaning SNAP agencies and DOEs were sometimes reconciling hundreds of individual school spreadsheets at a time. Another state administrator

mentioned that after collecting data manually via Excel spreadsheets from each school in the state in spring 2020, officials worked internally with the DOE's IT team to build a secure web-based system for SY 2020–21 benefits. However, with delayed guidance, limited time to plan, and lack of timely administrative funding, the state ultimately still ended up combing through school spreadsheets during the school year. Several states commented on the inefficient and time-intensive process required to consolidate and reconcile spreadsheets, especially since data were often not reported uniformly.

While some states grappled with spreadsheets throughout the year, most states eventually were able to develop some sort of data mechanism to collect information from schools or school districts. Thirteen state SNAP agencies sent out monthly or bimonthly surveys, or a single end-of-year survey, to schools/districts to fill out, and 12 states were able to rely on their DOE to manage and clean data before passing it to the SNAP team.<sup>23</sup>

## BENEFIT ISSUANCE

Another major step in the process was to manage challenges that cropped up during benefit issuance. One issue that emerged first in spring 2020 and carried over to SY 2020–21 was the issue of custody or primary guardianship, which led to challenges in determining who should ultimately receive the benefits and incorrect issuances that had to be redressed after the fact. As noted, available guidance did not typically provide clear direction on how to issue benefits when parents shared custody. In some cases, there was incorrect information on which adult the child currently lived with, resulting in incorrect issuances. For example, one state recounted that a child's parent received the P-EBT card but later discovered there was a restraining order that existed against that child's parent and the other parent was the acting guardian, making it difficult to retrieve. In general, the state's data systems could not address these issues proactively unless the state chose to issue the benefit card under the child's name. This is just one example of several complex cases that customer service teams had to contend with—for more information, see *Staffing Constraints and Customer Service*.

Some of the major challenges with benefit issuance were related to delays that states encountered while working with EBT card vendors. All states work with one of three EBT vendors in the country that process and issue cards to families. However, given the increased need all over the country and disruptions in the supply chains for physical cards, vendors had significant wait times for producing and issuing cards—sometimes up three to four weeks after receiving the data for issuance. Thus, timeliness of actual benefit receipt was also mediated by vendor challenges. Vendor relationships were complicated by the challenges of formalizing contracts in the absence of timely administrative funding, as many vendors require money up front that states didn't necessarily have the capacity to give. States

also expressed concerns that they felt there were problems with vendor pricing practices during the pandemic, as vendors were charging a previously nonexistent premium on cards. Given the lack of flexibility in EBT vendors to choose from and lack of time to switch even if this alternative was available, states commented that they felt a little helpless in dealing with these delays and pricing practices. During our focus groups, a number of state officials voiced the belief that some sort of agreement or intervention from FNS with vendors would have been helpful in this situation.

There were also overall delays and disruptions in mail delivery through the USPS during the pandemic, which were well documented.<sup>24</sup> Problems with mail delivery meant that families might not have received a card until a month or more after the actual benefit issuance had been approved. Lost mail, along with cards delivered to incorrect addresses or wrong guardians, contributed to a surge in card reissuances. One state mentioned that there had been a high rate of cards that were never delivered by post offices, and it subsequently needed to resend thousands of cards. Guardians also often requested replacement cards if they lost their card or if the state was relying on the guardian to reuse their card from the first issuance but the family didn't hold on to it because they didn't know there would be another round of issuances. This further contributed to delays in benefit receipt, especially without an adequate infrastructure to deal with these individual requests.

States worked to mitigate these challenges. For example, one state was able to set up a replacement card mechanism on its website and tried to proactively communicate with families to keep their cards in case of future issuances. The state also moved its replacement card process to local print operations to cut down on mailing times from the centralized vendor locations outside of the state. However, while efforts were made to work around mailing issues, the fundamental shipping issues remained steady throughout the school year.

## STAFFING CONSTRAINTS AND CUSTOMER SERVICE

Underlying the various administrative challenges for SNAP and education agencies alike was the lack of staff available to address the myriad issues and the resulting increased burden on existing staff. States emphasized that it takes time to hire new, skilled staff quickly. Outside of a pandemic—in a typical year with sufficient resources—the hiring process can take about six months, not including the training required to do certain work without supervision. Moreover, it's difficult to hire and train full-time staff for what may be an episodic program. Hiring temporary employees may allow for quicker scaling of capacity, but there are equity considerations when it comes to hiring and paying for temporary employees. Without administrative funding reaching states in a timely manner, the existing staff who were administering this program ultimately committed to a significant amount of overtime

hours. This strain, compounded with budgetary shortfalls during the pandemic, reduced hours, and hiring freezes, led to significant burnout among state staff. It's also important to note that these new responsibilities for SNAP agencies emerged while SNAP enrollments were rising, putting additional pressures on staffing and systems. A 2021 report from APHSA and Johns Hopkins found that over half of states agreed that P-EBT implementation affected their ability to manage core functions for SNAP case processing (Bresnahan et al. 2021). One state was able to hire 30 more people in their state SNAP agency to manage P-EBT and still expressed that it wasn't nearly sufficient to cover the workload.

The issue of staffing limitations was also severe among schools and school districts. A state education official highlighted that school nutrition staff were on the ground from the beginning of the pandemic coordinating and helping with grab-and-go meals to try to get foods into the hands of kids when not attending school in person. Though states tried to reduce the burden on districts and communicate mainly with administrative staff in the schools, state education officials reported that the work almost always fell predominantly to the school nutrition staff. Because this program was related to food, many of the tasks were given to them—even non-nutrition-related ones such as address validation. School staff were also at a disadvantage by needing to work remotely in many cases because of school shutdowns, so capturing data was very difficult and time-consuming.

Staffing constraints affected not only general workflow and the administration of P-EBT but also the ability to respond to the concerns of families, who were understandably worried about when they'd receive benefits. In most states, there simply were not enough internal resources to deal with the onslaught of calls and concerns from parents, schools, advocates, and community members. SNAP customer service staff, especially in larger states, were already dealing with expanded call volume for SNAP and other existing state programs and could not take on the additional load. One official we interviewed commented that their state received over 6,000 calls on the first day of issuance alone, while another responded that their state was getting 1,000 phone calls a day but would typically only be able to service 800 of these. The official acknowledged that this meant 200 calls a day were going unanswered, meaning parents weren't getting the information they needed; but even with additional staff, there was no way to meet the demand. Calls from parents were most commonly inquiries about when their benefits would be coming, resolving custody issues, updating information, and asking about their benefit levels. Questions about benefit levels were particularly abundant, as it was difficult for clients to understand why their child got a specific amount while another child in their school received a different benefit amount. One state official also had an interesting insight that a lot of the calls the state received were from parents new to the realm of human services—some were those who had

never interacted with benefit programs such as SNAP and therefore would have more questions and concerns about the process than preexisting clients who might be more accustomed to program requirements and delays.

States developed different models to mitigate the challenges of providing adequate customer service, especially as many agencies had dealt with this issue in spring 2020 implementation and could anticipate it to a certain degree. Some states set up email inboxes and/or websites with up-to-date information about forms and instructions on how to update/correct information and validate addresses. However, some states didn't have any information online, likely due to limited IT resources. One state partnered with United Way 211, a common resource for residents of an area looking for assistance, and created a dedicated line for families. The most common method was for SNAP agencies to set up a specific customer service line for P-EBT, with several contracting with outside call centers as they didn't have internal capacity.

However, some state officials voiced a downside to using an external call center. Often, resolving a customer complaint required going into their case file and changing/updating information or checking information about benefits. However, with all of the data management issues that existed and a lack of a centralized database, a complaint could require a change either on the school data side or on the SNAP data side. If the call center didn't have access to both sets of data, or had a mismatch, officials would have to refer the customer to call the state, who would have to check with the DOE or the school and then get back to the customer. This created a challenging workflow and, more importantly, an extremely burdensome experience for the family. One of the biggest examples of this challenging workflow was that often, customer service inquiries would also go to child nutrition and school staff. Schools were already overflowing with crises in food distribution and virtual learning, making it difficult for them to field P-EBT inquiries without sufficient information or capacity to respond.

#### COORDINATION BETWEEN STATE AND LOCAL SNAP AND CHILD NUTRITION STAKEHOLDERS

Finally, one of the most overarching internal challenges states identified was the need to establish an entirely new type of partnership between SNAP and DOE/child nutrition stakeholders in a very short period. Two entities with limited preexisting relationships, very different methods of handling data, and no infrastructure to share the full range of required data had to rapidly develop a partnership to implement this program, which understandably led to a great deal of confusion and challenges.

State officials reported that the disconnect between SNAP and child nutrition program administration originated at the federal and regional level. Several state officials noted that program

guidance should have come jointly from the child nutrition and SNAP administrators at the USDA, rather than solely from FNS, and that P-EBT would have greatly benefited from visible priority and investment from both sets of stakeholders. State officials expressed that a lack of timely and clear guidance on how state entities should work together contributed to a sense of unclear ownership at the state level.

While SNAP administrators agreed that P-EBT was an incredibly valuable program, many state officials shared the sense that SNAP ultimately got “stuck” with P-EBT in that it was the main agency involved in organizing and implementing the program, although it could not exert control over vital inputs. SNAP administrators perceived a lack of ownership from their DOEs about prioritizing timely, high-quality data. However, the lack of organization and agreement at the federal level resulted in many of the difficulties in data management—SNAP agencies had to request data from schools and DOEs about learning models that didn’t exist, and schools and nutrition staff were already overburdened throughout the pandemic.

DOEs and school child nutrition personnel were also preoccupied with administering grab-and-go options and maintaining school meal operations for schools with hybrid attendance or fully remote status. Some state administrators felt that schools were also concerned about how P-EBT might compete with their primary modes of operation, although the program was explicitly designed to be a complement to other efforts. Another concerning factor for DOEs and school administrators was the significant decline in the number of FRPL applications they were receiving given the waiver of FRPL requirements for school meal programs other than P-EBT. However, the decline was a concern for many states because the applications are often used to count the number of low-income students, an important input into the formula for determining state funding—31 states use FRPL rates as a factor in determining how much additional funding districts receive.<sup>25</sup> Thus, states perceived that school nutrition programs were hesitant to fully embrace P-EBT, especially with limited communication as to how the program would be rolled out. Nevertheless, state administrators also reported that many districts saw P-EBT as an important strategy for helping families and leaned into their roles in getting cards to families, especially ones with inaccurate addresses.

State education officials also commented on the different cultures between the two types of agencies as well as the pressures on both sides experienced by staff who were extremely overworked and lacking necessary capacity. One state official mentioned that much time with the state’s SNAP agency counterparts was spent educating each other on programmatic differences between school meals, summer food service, the Child and Adult Care Food Program and other program details that ultimately were very time-consuming to learn. Another state official described that child nutrition

programs focus on accessible customer experience, including prioritizing communications in simple, plain language, which didn't necessarily align with the rigorous program integrity communications used by SNAP agencies.

Despite these tensions and challenges, many states reported that they were ultimately able to form effective collaborations to advance program goals and felt that this investment was worthwhile to put forth this program. One state child nutrition administrator summarized this hard-won outcome as a “wonderful relationship building opportunity.”

# Key Findings and Recommendations

In this section, we summarize the key challenges with implementing P-EBT during the pandemic and recommendations for smoother implementation in future iterations of the program. These broader systemic challenges contributed to the multiple delays that ultimately diluted the ability of states to achieve the original intent of the program, which was to ensure families received timely resources in response to a national emergency. Many of these recommendations are based on feedback from state agencies administering P-EBT based on their assessment of the strengths and weaknesses of the SY 2020–21 implementation process and their insights into how future iterations could be handled more effectively, either in emergency situations or in building an infrastructure for wider use of these types of programs during the summer months.

**Challenge:** A lack of **clear, consistent, and, most importantly, timely guidance from Congress and FNS contributed to significant delays in getting benefits to families.** This barrier extends to a lack of timely provision of administrative funding, which impacted states' ability to carry out their roles effectively.

## Recommendations:

1. **Consider a standing authority for a P-EBT program that automatically kicks in during periods when in-person school learning is disrupted.** Timely congressional authority to extend the program beyond the first few months as needed would have given FNS and states the ability to plan ahead and build more effective approaches from the beginning as well as for future emergencies. Examples like Disaster SNAP administration could be helpful guidance.
2. **Provide timely, clear guidance, and establish simple and feasible options for state implementation wherever possible.** While this is difficult to do in emergency situations, and there is no one-size-fits-all solution, prioritizing clear guidance that more specifically outlines a set of basic options for state approaches to determine benefit amounts, learning models, and other components could have helped limit the number plan submissions and rounds of rounds of guidance and ultimately get benefits out sooner to families.
3. **Prioritize collaboration at the federal level between FNS, SNAP administrators, and state Child Nutrition Programs, which can facilitate more effective state partnerships.** State SNAP agencies agreed that, ultimately, P-EBT is a school meals program, and it was appropriate for the state Child Nutrition Programs office to take the lead in administering. However, P-EBT requires a level of coordination with SNAP that is unprecedented and requires ongoing collaboration that would have benefited from stronger shared leadership within FNS. Planning

and communication, starting with the FNS national office and continuing through to regional offices, is critical to establishing shared accountability and a full understanding of challenges and needs across state SNAP and child nutrition agencies trying to work above program silos to run a successful P-EBT program.

4. **Award all relevant funding in a timelier manner, and limit barriers to application.** States' next steps stalled because they were held to various external contractor timelines, and the assumption that a plan approval meant benefits could go out immediately was unrealistic. Though it is difficult to predict crises months in advance, developing a more flexible funding mechanism for states to be granted funding and outlining details on what exactly is eligible for reimbursement will ensure that states have time to hire IT, tech, and customer service resources to staff call centers and allocate resources for eligibility and benefit system development.

**Challenge:** The **complexity of this program was a fundamental barrier** to allowing it to fully achieve its stated goal—providing *timely* support to households missing meals during the school year to buffer food insecurity. The failure to maximize use of simplifying assumptions contributed heavily to delays and implementation challenges. Despite a great deal of hard work and good intentions all around, the primary goal of P-EBT to provide food assistance to families during the months it was most needed was largely unmet.

**Recommendations:**

1. **Simplify data collection requirements.** State systems are simply not in place to track individual student status, and during emergency situations, patterns of attendance will likely similarly shift at the district, school, and even classroom level. Increasing the allowance for simplifying assumptions will allow states to focus on administering benefits in a timely fashion without being burdened with stringent data requirements. While program integrity should be a priority in any nutrition assistance program, failing to adapt procedures to realities on the ground undermined the ability of states to deliver meaningful relief.
2. **Allow for a national, standardized benefit for all eligible children.** Several states agreed that in future emergency situations, having the ability to provide a national standard benefit, or a limited combination of benefits, would make the process of administering benefits much easier. Having more standardized benefits would also help with concerns around equity, as states found it difficult to explain to parents why they were getting different amounts from

others in their area. In an emergency situation, providing clear and easy to understand benefits to families is key.

3. **Look to flexibilities offered in other programs, like the Seamless Summer Option or Summer P-EBT, as guidance.** Simplifying P-EBT is a crucial decision point for policymakers moving forward. Waivers for Seamless Summer Option administration take into account the difficulty schools would normally face in emergency situations in accessing electronic systems to determine eligibility. Waivers granted gave school food service professionals flexibility to distribute meals at a variety of safe meal sites without burdening them with the need to confirm student enrollment and eligibility. Summer P-EBT offers a helpful flexibility in administering a standard benefit to all children for the summertime period. These are helpful frameworks with which to look at how P-EBT was administered and why it was so much more difficult.

**Challenge:** States lacked the **technology and integrated data systems needed** to properly implement this program within the required guidelines. With limited infrastructure, states wasted time on processes that could have been automated.

**Recommendations:**

1. **Increase flexibilities in allowable uses for administrative funding so states can build infrastructure.** Rather than temporary, ineffective work-arounds, states need resources to build better infrastructure and underlying systems to be able to “turn on” P-EBT in future emergency situations or support future summer EBT programs. Having the resources to build these systems well in advance that would support the seamless identification of eligible children and benefit delivery would be immensely beneficial.
  - a. For example, from prior experience, moving SNAP toward conducting direct certification for school meals was an incremental process 15 years in the making and took explicit investment by the federal government to improve direct certification rates to acceptable standards. The importance of awarding grants to states so they can develop and upgrade their current systems to improve efficiency and performance is well documented.<sup>26</sup>
2. **Examine existing infrastructure around EBT card stock to shorten the time between benefit authorization and receipt.** Future emergency situations will likely create similar supply chain issues that result in avoidable delays in getting cards to families, requiring a meaningful look

into alternative options and the capacity of the market to handle sudden shifts in demand. This would also decrease the barrier of verifying addresses of families, which was a significant burden. Some states recommended national-level coordination on market competitiveness around the three vendors, as having few EBT vendors really slowed down the process. States also expressed serious concerns about the pricing they experienced from vendors during the pandemic.

3. **Specifically, invest in infrastructure around digital wallet/mobile EBT options.** Several states expressed a high level of interest in this option. This would require initial investment but would be an investment in the resiliency of the program in times of crisis and is needed to support future iterations and reflect the changing ways people shop and interact with benefits. There are currently mobile EBT pilots in five states authorized by the 2018 Farm Bill, so documenting the lessons learned from these would be helpful for P-EBT.<sup>27</sup> Mobile options not only help address mailing delays but could also help alleviate many of the address data concerns that were so widespread during the pandemic. As mentioned earlier, there are reasons why schools aren't as rigorous with their data collection as SNAP agencies and why parents may not want their actual home address on file.

Overall, states agree that any design of future iteration should consult with states on the administrative side of rolling out a new program before moving forward. This includes all relevant stakeholders—in this case, involving SNAP agencies, DOEs, schools, and even the families receiving benefits in the program planning at the national level would have saved a great deal of time. While this report focused on the perspectives of states, more insights are needed to understand how barriers faced by states translated to the experiences felt by families and children. Building on existing insights rather than building a new program entirely will also be useful. As one state mentioned, the real tragedy would be if all their work was for nothing and that building off the existing framework would be critical. Any future changes should involve creating a federal framework for shared accountability in implementation between child nutrition agencies and their local schools responsible for determining eligibility and SNAP agencies responsible for issuing benefits.

# Appendix A: Timeline of P-EBT-Related Legislation

As of August 2021

## 2020

- **March 18:** The [Families First Coronavirus Response Act \(FFCRA\)](#) was signed into law. This gave authority for P-EBT through fiscal year 2020.
- **April 9:** The first state, Michigan, has a P-EBT plan approved for SY 2019–20.
- **April 15:** FNS released guidance through a [Q&A document](#) around eligibility for P-EBT, verification, data sharing, summer meals, amount of benefits, and expungement.
- **August 13:** The last state, Idaho, has a P-EBT plan approved for SY 2019–20.
- **August 20:** FNS emailed guidance to states alerting them that they would be allowed to issue P-EBT benefits for August and September 2020. It included a guidance document, amendment template, and amendment spreadsheet.
- **October 1:** The [Continuing Appropriations Act, 2021 and Other Extensions Act](#) was signed into law. The House passed a Continuing Resolution that would fund P-EBT through fiscal year 2021 and included an expansion to children in child care. Eligible children would now include those with modified or reduced schedules due to the pandemic, and a “simplifying assumptions” clause would give states additional flexibility in issuing benefits. It also included 100 percent federal reimbursement to agencies administering P-EBT.
- **November 16:** FNS created a [new plan template and set of Q&As](#) for states. At the time, the USDA would not accept state plans to issue benefits for children in child care due to complex operational issues. Guidance detailed requirements of bimonthly data collection and limited use of simplifying assumptions.
- **December 15:** The first state, Massachusetts, has a P-EBT plan approved for SY 2020–21.
- **December 21:** The [Consolidated Appropriations Act, 2021](#) was signed into law. This further clarified that states may use a state or local public health ordinance developed in response to the COVID-19 pandemic to determine if a school is closed or operating with reduced hours. The bill also explicitly told states that they may use simplifying assumptions to establish

benefit levels and simplified the process for states to establish eligibility for children in child care. Finally, this clarified that schools are also eligible for 100 percent federal reimbursement for P-EBT administration.

## 2021

- **January 29:** FNS created a [new plan template and set of Q&As](#) for states submitting plans for children in child care. This guidance included more explicit child care eligibility criteria. States that were already approved/already submitted could either submit two separate plans or amend their previous plan. The guidance also detailed how to use simplifying assumptions around school status and incorporated an increased benefit amount (\$0.96 increase) that could be applied retroactively.
- **March 11:** The [American Rescue Plan Act of 2021](#) was signed into law. The bill expanded the authority of P-EBT to include summer benefits for all children eligible for free and reduced-price meals and authorized the program for any future school year affected by COVID-19 and the summer thereafter. It also appropriated \$25 million for technology improvements in online purchasing, mobile capabilities, and modernizing EBT.
- **April 26:** FNS posted [guidance, a set of Q&As, and a new plan template](#) for summer P-EBT plans.

# Appendix B: P-EBT for Children under Age 6

The implementation of P-EBT benefits for children under 6 was logistically complicated, especially before legislative fixes were made and additional guidance was released. State SNAP agencies lacked any data sources on child care agencies, and state education agencies typically didn't include child care agencies in their purview, outside of programs attached to schools. State agencies that did interact with child care providers had little information on program status and were unsure how to go about determining whether programs were closed or operating at reduced capacity. Therefore, states perceived that administering benefits to this population based on program status was logistically impossible given the vague legislative wording and the lack of existing data.

Additional legislation around administering benefits to children in child care did not arrive until late December 2020 through the Consolidated Appropriations Act, 2021, which created a simplifying assumption that eligibility could include the following three criteria:

- The child under 6 is a member of a household that received SNAP benefits at any time since October 1, 2020;
- The child is enrolled in a covered child care facility (under the FFCRA, all children under the age of 6 were deemed to be in a covered child care facility), and;
- The child's child care facility is closed or operating with reduced attendance or hours for at least five consecutive days, or one or more schools in the area of the facility or child's residence is closed or operating with reduced attendance.

Essentially, this meant that states could submit plans that defined a process for identifying and issuing benefits to all SNAP children under 6 as long as they could justify if they lived in the area where a child care facility or school was closed or operating under reduced attendance or hours. This shifted the understanding of this benefit from initially requiring data on each child's child care facility to being able to use SNAP benefits as a proxy determinant. However, the way this was initially introduced created lasting confusion among states. While the initial guidance clearly stated that children were eligible as long as they were a member of a household that received SNAP benefits at any time since October 1, 2020, FNS individually clarified with states that children would only be eligible for benefits in the months that they are enrolled in SNAP. However, FNS never released additional public guidance to clarify this. Moreover, guidance on implementation did not arrive until

the end of January. By the time states received this guidance, they were already under immense pressure to finalize plans and issue benefits for school-age children. As a result, many states had to delay planning on their under 6 benefits due to the competing challenges and limited resources. Delays in communication and guidance, paired with overburdened SNAP agencies, contributed to a long delay in issuing benefits for this population; the first P-EBT plan for children under 6 was not approved until March 2, 2021 (Indiana).

Through additional conversations with states throughout the summer of 2021, it's evident that some states are still struggling to put together a P-EBT plan for children under 6. As of July 2021, 38 states, Puerto Rico, and the District of Columbia had an approved plan to administer benefits to children under 6.

# Appendix C: Glossary of Terms

**Community Eligibility Provision (CEP):** The Community Eligibility Provision is a nonpricing meal service option for schools and school districts in low-income areas. It allows the nation's highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. Instead, schools that adopt CEP are reimbursed using a formula based on the percentage of students categorically eligible for free meals based on their participation in other specific means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF).<sup>28</sup>

**Direct Certification:** Under direct certification, children are determined eligible for free meals without the need for household applications by using data from other means-tested programs (e.g., SNAP, TANF, or Medicaid, depending on state guidelines).<sup>29</sup>

**Food and Nutrition Service (FNS):** The Food and Nutrition Service, an agency of the USDA, works to end hunger and obesity through the administration of 15 federal nutrition assistance programs, including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), SNAP, and the National School Lunch Program (NSLP).

**Free and Reduced-Price Lunch (FRPL):** Under the NSLP, families complete household income eligibility forms. The forms helped schools certify students as eligible for FRPL and, until recently, had the unintended benefit of providing a national measure of student poverty.<sup>30</sup>

**National School Lunch Program (NSLP):** The National School Lunch Program is a federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. It provides nutritionally balanced, low-cost or free lunches to children each school day. The program was established under the National School Lunch Act, signed by President Harry Truman in 1946.<sup>31</sup>

**Seamless Summer Option (SSO):** Seamless Summer Option is a program available for School Food Authorities participating in the NSLP or School Breakfast Program. SSO provides meals free of charge to children, 18 years and under, from low-income areas when school is not in session.<sup>32</sup>

# Notes

- <sup>1</sup> Jonathan Schwabish, Nathan Joo, Elaine Waxman, and Natalie Spievack, “Strategies and Challenges in Feeding Out-of-School Students,” Urban Institute, April 20, 2020, <https://www.urban.org/research/publication/strategies-and-challenges-feeding-out-school-students>.
- <sup>2</sup> See CBPP’s documentation project around P-EBT for the 2019–20 school year here: “CBPP/FRAC P-EBT Documentation Project Shows How States Implemented a New Program to Provide Food Benefits to up to 30 Million Low-Income School Children,” Center on Budget and Policy Priorities, <https://www.cbpp.org/research/resource-lists/cbppfrac-p-ebt-documentation-project-shows-how-states-implemented-a-new>. See the report produced by Kone Consulting here: “Pandemic EBT Implementation Documentation Project,” September 2020, <https://www.cbpp.org/sites/default/files/atoms/files/10-7-20fa-kone.pdf>.
- <sup>3</sup> [Families First Coronavirus Response Act](#), Pub. L. No. 116–127.
- <sup>4</sup> “SY 2019–20 P-EBT State Participation,” USDA, Food and Nutrition Service, updated February 1, 2021, <https://www.fns.usda.gov/snap/sy-2019-2020-pebt-state-participation>.
- <sup>5</sup> Puerto Rico, the Northern Mariana Islands, and the American Samoa were not eligible to submit a plan for P-EBT benefits for the 2019–20 school year.
- <sup>6</sup> Jason DeParle, “Hunger Program’s Slow Start Leaves Millions of Children Waiting,” *New York Times*, May 26, 2020, <https://www.nytimes.com/2020/05/26/us/politics/child-hunger-coronavirus.html>.
- <sup>7</sup> Anya Kamenetz, “When It Comes to Reopening Schools, ‘The Devil’s in the Details,’ Educators Say,” NPR, July 9, 2020, <https://www.npr.org/2020/07/09/888878030/when-it-comes-to-reopening-schools-the-devil-s-in-the-details-educators-say>.
- <sup>8</sup> See table 1, Center on Budget and Policy Priorities, “States Are Using Much-Needed Temporary Flexibility in SNAP to Respond to COVID-19 Challenges,” October 8, 2020, <https://www.cbpp.org/research/food-assistance/states-are-using-much-needed-temporary-flexibility-in-snap-to-respond-to>.
- <sup>9</sup> [Continuing Appropriations Act, 2021 and Other Extensions Act](#).
- <sup>10</sup> “P-EBT State Plans for School Year 2020-21,” USDA, Food and Nutrition Service, November 16, 2020, <https://www.fns.usda.gov/snap/p-ebt-state-plans-sy-20-21>.
- <sup>11</sup> H.R. 133, [Consolidated Appropriations Act, 2021](#), 116th Cong. (2020).
- <sup>12</sup> H.R. 1319, [American Rescue Plan Act of 2021](#), 117th Cong. (2021).
- <sup>13</sup> “Pandemic EBT—Summer 2021,” USDA, Food and Nutrition Service, April 26, 2021, <https://www.fns.usda.gov/pandemic-ebt-summer-2021>.
- <sup>14</sup> See CBPP’s documentation project around P-EBT for the 2019–20 school year here: “CBPP/FRAC P-EBT Documentation Project Shows How States Implemented a New Program to Provide Food Benefits to up to 30 Million Low-Income School Children,” Center on Budget and Policy Priorities, <https://www.cbpp.org/research/resource-lists/cbppfrac-p-ebt-documentation-project-shows-how-states-implemented-a-new>. See the report produced by Kone Consulting here: “Pandemic EBT Implementation Documentation Project,” September 2020, <https://www.cbpp.org/sites/default/files/atoms/files/10-7-20fa-kone.pdf>.
- <sup>15</sup> See CBPP’s documentation project around P-EBT for the 2019–20 school year here: “CBPP/FRAC P-EBT Documentation Project Shows How States Implemented a New Program to Provide Food Benefits to up to 30 Million Low-Income School Children,” Center on Budget and Policy Priorities,

<https://www.cbpp.org/research/resource-lists/cbppfrac-p-ebt-documentation-project-shows-how-states-implemented-a-new>. See the report produced by Kone Consulting here: “Pandemic EBT Implementation Documentation Project,” September 2020, <https://www.cbpp.org/sites/default/files/atoms/files/10-7-20fa-kone.pdf>.

- <sup>16</sup> During the summer EBT pilot implementation, a similar major challenge was cited that implementation for a summer program was very difficult with only receiving guidance during the spring, and these pilot programs were far simpler in their design than P-EBT for SY 2020-21. For more information, see “Summer Electronic Benefits Transfer for Children (SEBTC) Demonstration: Evaluation Findings for the Proof-of-Concept Year,” USDA, November 2012, [https://fns-prod.azureedge.net/sites/default/files/SEBTC\\_Year1Findings.pdf](https://fns-prod.azureedge.net/sites/default/files/SEBTC_Year1Findings.pdf).
- <sup>17</sup> [Continuing Appropriations Act, 2021 and Other Extensions Act](#).
- <sup>18</sup> H.R. 133, [Consolidated Appropriations Act, 2021](#), 116th Cong. (2020).
- <sup>19</sup> [Continuing Appropriations Act, 2021 and Other Extensions Act](#).
- <sup>20</sup> While the share of students receiving SNAP benefits (i.e., those who are directly certified) is highly correlated with the share of students receiving free lunch, historically, it is an underrepresentation of the share of free lunch students. Furthermore, using only the share of students receiving SNAP benefits leaves the share of reduced-price lunch students completely unaccounted for. See Kristin Blagg, “Which Students Count as Low Income? New National Data Shine Light on Proxy for Poverty,” *UrbanWire* (blog), Urban Institute, January 25, 2019, <https://www.urban.org/urban-wire/which-students-count-low-income-new-national-data-shine-light-proxy-poverty> for more information.
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