

**Operating P-EBT During a Covered Summer Period
Questions and Answers
May 9, 2022**

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Summary:	(1) This document provides information to States to assist in the development of State plans to operate Pandemic EBT for school children and children in child care during a covered summer period. (2) This document relates to Section 1101 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act, 2021 (P.L. 117-2)
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Additional context and background for this document can be found at:
<https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

The submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

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1. What are the eligibility requirements for P-EBT during a covered summer period?

The Families First Coronavirus Response Act (the FFCRA), as amended by the American Rescue Plan Act, 2021, authorizes USDA to approve an extension of the State P-EBT plan during a “covered summer period.” The statute defines a covered summer period to mean “a summer period that follows a school year during which there was a federal [public health emergency declaration](#).”

The FFCRA continues to require that schools participating in the National School Lunch Program and School Breakfast Program and covered child care facilities “shall be deemed closed” for purposes of the covered summer period. As a practical matter, that means that States with an approved extension for a covered summer period may issue P-EBT benefits during the covered summer period without regard to students’ school status, individual COVID-related absences and virtual learning days, or the operating status of covered child care facilities.

Q/A #9, below, provides additional detail on how States will identify P-EBT-eligible school children and children in child care during a covered summer period.

2. Are children eligible for P-EBT benefits for the entire 2022 covered summer period?

The FFCRA makes *school children* eligible for P-EBT benefits during the entire 2022 covered summer period. However, P-EBT’s *child care* population (SNAP-enrolled children under 6) is only eligible while the federal public health emergency remains in place. If the public health emergency declaration ends prior to the end of the summer, the summer child care benefit must be reduced, or pro-rated, for the portion of the covered summer period that the public health emergency remained in effect. See Q/A #16, below, for additional detail.

3. How long is the covered summer period?

The covered summer period shall not be more than the 90 calendar days that follow a school year during which there was a public health emergency declaration.

4. How many P-EBT benefit days are in the covered summer period?

The number of P-EBT benefit days equals the number of weekdays during the covered summer period.

5. School districts, not the States, typically set the length of their summer breaks. And in most States the length of the summer break tends to vary across districts. Must States determine the length of each school district's covered summer period based on their summer breaks and set district-specific P-EBT benefit amounts?

No, USDA does not expect States to calculate separate summer P-EBT benefit amounts by school district. Instead, USDA invites States to adopt a U.S. standard P-EBT benefit based on USDA's analysis of scheduled summer periods in the largest school districts of every state.¹

The U.S. standard benefit is equal to the median number of weekdays in the sampled school districts multiplied by the daily P-EBT rate. For States in the continental U.S., that works out to a fixed summer benefit of \$391 per eligible child (55 days at \$7.10 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #15 for a complete set of standard benefit amounts.

USDA invites States to adopt the U.S. standard summer benefit in order to simplify the development of States' summer P-EBT plans and expedite their approval. However, States may use a different number of days (not to exceed 90 calendar days minus weekends) in the P-EBT benefit calculation as defined at Q/A #15. States that wish to set their own benefits have two options:

1. States may set school district-specific P-EBT benefits based on the actual start and end dates of each of their school districts' summer periods, not to exceed 90 days.
2. States may calculate a covered summer period of fixed duration using their school districts' average summer start and end dates, not to exceed 90 days. This will result in a State-specific standard P-EBT benefit for all eligible children in the State. States that elect this option must describe the methodology behind their calculations in their summer P-EBT plans. USDA will not approve a plan that does

¹ To calculate the length of the school districts' summer breaks USDA reviewed publicly available SY 21-22 and SY 22-23 calendars for the two largest districts in every state (and the single primary school districts in the District of Columbia, Guam, and Puerto Rico) during the last week of March 2022. If SY 22-23 calendars were unavailable for either of the two largest districts, USDA substituted the length of the summer breaks for the third or fourth biggest districts in the state. If either those were unavailable, USDA substituted the length of the 2021 summer breaks for the states' largest districts. The median length of these districts' summer breaks, excluding weekends, is 55 school days.

not tie the length of its average summer period to the actual summer calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.

6. The U.S. standard summer benefit is presented above as a figure for the entire summer. Does USDA expect States to distribute the entire benefit in a single issuance? Or should States distribute the benefit across multiple issuances?

Whether States elect to use the U.S. standard benefit or set their own summer benefits based on the school calendars specific to their States, USDA encourages States to distribute the benefit in two or even three issuances across the summer. While USDA recognizes that practical considerations will affect the timing of States' P-EBT issuances, States should distribute summer P-EBT benefits (and school year benefits) in issuances that coincide as closely as possible with the period that they are intended to cover.

7. Must States have an approved P-EBT plan in place for the school year in order to issue benefits in the summer? And must States submit an amendment to extend those plans to the summer?

States must have an approved SY 21-22 P-EBT plan for school children or children in child care to issue P-EBT benefits in the summer of 2022. States may seek an extension of any approved SY 21-22 P-EBT plan to provide benefits to both groups of children.

Extending a school year plan to include a covered summer period will require the States to submit a plan amendment to USDA. However, USDA expects that the development and approval of plan amendments can be completed quickly. To expedite that process, USDA has created a streamlined template for States to record and submit the necessary information for efficient review and approval.

8. Must States with an approved P-EBT plan during the school year provide P-EBT benefits during a covered summer period?

No. But USDA encourages all States to apply for an extension of their SY 21-22 P-EBT plan for benefits during a covered summer period.

9. What children are eligible for P-EBT benefits during a covered summer period?

a. School children

- i. All school children who would have received free or reduced price school meals at school under the NSLP or SBP are eligible for P-EBT benefits in the summer of 2022. This includes:

- School children who received P-EBT benefits during the last month of SY 21-22. Because the covered summer period is an extension of the school year, this includes children who graduate at the end of the school year.
 - School children who were eligible for free or reduced price school meals under the NSLP and SBP in SY 21-22 but did not receive P-EBT benefits in the last month of the school year because they attended school in-person and benefitted from a free or reduced price meal service at school.
- ii. Children who are determined newly eligible for free or reduced price school meals during the covered summer period.
- States *must* provide an opportunity for families to establish their eligibility for free or reduced price school meals throughout the covered summer period. USDA encourages States to extend their established SFA-administered direct certification and school meal application processes through the summer using the administrative funding provided by the FFCRA.
 - USDA encourages States to issue P-EBT benefits for the full covered summer period to any child who is determined newly eligible for free or reduced-price school meals ***prior to the end of the covered summer period.***
 - See Q/A #10 for additional information on certifying children for benefits during the summer.
- iii. Children in schools or school districts that have been newly approved to ***begin*** operating under the Community Eligibility Provision or under Provisions 2 or 3 in SY 22-23 are only eligible for P-EBT benefits during the covered summer period if they are determined income eligible or categorically eligible for free or reduced school meals.

b. Children in child care

- i. Children enrolled in SNAP during the covered summer period who received P-EBT child care benefits in the last month of the school year.
- ii. Children enrolled in SNAP during the covered summer period who would have received P-EBT child care benefits in the last month of the school year, but did not receive benefits because their child care facility was not closed or operating at reduced attendance or hours in that month, and neither their

child care facility nor the child's residence was in the area of a school that was closed or operating at reduced attendance or hours in that month.

- iii. Children enrolled in SNAP who are born before the end of the covered summer period are eligible for the full P-EBT summer benefit (or the pro-rated summer benefit if the public health emergency expires before the end of the summer period).
- iv. As an administrative simplification States may issue the full P-EBT summer benefit (or the pro-rated summer benefit referred to in Q/A #2 and described more fully in Q/A #16) to children whose SNAP enrollment begins or ends during the covered summer period and, if applicable, prior to the expiration of the public health emergency.

10. Many school districts are not able to process school meal applications during the summer months. How should the State certify children in those districts for summer P-EBT benefits?

The traditional SFA-administered school meal application process contains integrity safeguards that make it the preferred method for certifying children for free or reduced price meal benefits, and by extension, summer P-EBT. For this reason, USDA encourages States to use that process to certify newly eligible children during the summer. While SFA staff may not be available on a full-time basis, States and SFAs should consider maintaining a minimum presence to process applications, perhaps on a part-time or weekly basis. USDA reminds States that the FFCRA makes administrative funds available at both the state and local levels for costs that are properly allocable to P-EBT activity.

Another alternative is for SFAs to accept new applications during the summer but only process them after the start of the new school year. Children determined eligible on applications *submitted* prior to the end of the summer could then be issued P-EBT benefits retroactively after the start of the new school year. However, it is preferable for children to be issued their benefits during the summer period, so USDA encourages school districts to process applications as they receive them before considering this alternative.

11. In States that elect to use the U.S. standard summer benefit, or a standard benefit calculated by the State as described in Q/A #5, there may be short periods in some schools where the covered summer period overlaps with the end of SY 21-22 or the start of SY 22-23. Must States reduce children's summer P-EBT benefit to account for this overlap?

No, this is not required but would be permissible. States may, as an administrative simplification, issue a common summer benefit to eligible children as described in Q/A #5 without reducing that benefit for any overlap with the end of SY 21-22 or the start of

SY 22-23. This applies to both traditional and year-round schools. However, please note a covered summer period is statutorily limited to “not more than 90 days.”

12. Are P-EBT-eligible SNAP-enrolled children who attend child care and receive meals through their child care provider during the covered summer period eligible for summer P-EBT benefits on those days?

Yes, because the FFCRA deems covered child care facilities closed during the covered summer period, children may receive meals at their child care facilities and summer P-EBT benefits for the same day.

13. May children receive meals through the Summer Food Service Program and P-EBT benefits for the same day during the covered summer period?

Yes.

14. Are costs incurred to administer the P-EBT program during a covered summer period reimbursable under P-EBT’s administrative funding provision?

Yes. The FFCRA, as amended, provides for the full reimbursement of costs incurred by Federal agencies, State agencies, other agencies of the State, local units, and schools to administer P-EBT. This includes P-EBT administrative costs incurred in a covered summer period.

15. What is the daily value of a P-EBT benefit during the covered summer period?

These are the daily P-EBT rates for the 2022 covered summer period. They are the free reimbursement rates for USDA’s school meal programs for school year 2021-2022.

2022 Covered Summer Period	Free Reimbursements			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.pdf>

2022 Covered Summer Period	U.S. Standard P-EBT Benefit		
	Median Length of Covered Summer Period (weekdays)	Daily P-EBT Rate	Standard Benefit
Contiguous U.S.	55	\$7.10	\$391
Alaska	55	11.44	629
Hawaii, Guam, Virgin Islands, Puerto Rico	55	8.28	455

16. At the time of release of this Q&A document, the federal public health emergency declaration for COVID-19 remains in place. However, USDA cannot say with certainty whether the public health emergency will continue through the end of the summer. Given this uncertainty, are states able to issue the full USDA standard benefit to children in child care this summer?

At the time of release of these Q&As, USDA is unable to guarantee that states will be able to issue the full \$391 USDA standard benefit to children in child care this summer. However, given that the U.S. Department of Health and Human Services commits to providing states with 60 days’ notice before terminating the public health emergency, we know that the public health emergency will extend, at a minimum, to July 9. For purposes of P-EBT administration, USDA considers this to be 1/2 of the way through the covered summer period. So, as of May 9, USDA can guarantee a minimum USDA standard benefit for children in child care of \$195. If HHS does not issue a notice of termination to states prior to June 30, then states will be able to issue the remaining \$196 (i.e., the full \$391 USDA standard benefit) to children in child care. If HHS issues a notice of termination prior to June 30, then USDA will issue additional guidance to states that provides the remaining balance of the USDA standard benefit for children in child care commensurate with the expiration date of the public health emergency.

Note that this only applies to the summer benefit for children in child care. As noted in Q/A #2, states may issue the full \$391 USDA standard benefit to all eligible school children, regardless of the status of the public health emergency.