



## FAQs on Pandemic-EBT and Coronavirus Response-SNAP

This resource is based on USDA's guidance to states on implementing the new Coronavirus Response SNAP (CR-SNAP) and Pandemic-EBT (P-EBT) authorized by the Families First Coronavirus Response Act. Updated based on information available as of 5/26/2020.

Please refer to the US Department of Agriculture's guidance on P-EBT, CR-SNAP, and your state agency for additional information.

To quickly find what you need, please click on a question to be directed to its answer.

- 1. What is the Families First Coronavirus Response Act (FFCRA) (H.R 6201)?
- 2. Where can I find a summary of the FFCRA?
- 3. What is P-EBT?
- 4. Who is eligible for P-EBT?
- 5. What must states do to implement P-EBT?
- 6. What guidance is available from USDA on P-EBT?
- 7. If my state implements P-EBT, will my school or sponsoring organization still be able to serve non-congregate meals?
- 8. Is P-EBT available to children who are affected by child care closures?
- 9. Which states have been approved for P-EBT?
- 10. What are the CR-SNAP benefit increases authorized by FFCRA?
- 11. Who is eligible for CR-SNAP?
- 12. Are families receiving P-EBT for their children also eligible to receive CR-SNAP authorized by the FFCRA?
- 13. How much is the CR-SNAP allotment?
- 14. How will CR-SNAP be issued?
- 15. Which states have been approved for CR-SNAP?
- 16. Are states required to submit waiver requests on work requirements for Able-Bodied Adults Without Dependents (ABAWDs) in SNAP?
- 17. What additional SNAP operational and administrative flexibilities are provided to states under FFCRA?
- 18. Is the use of SNAP EBT cards to purchase food online allowed?

19. Where can I find a full list of nationwide waivers issued by USDA on SNAP and Child Nutrition Programs?

## 1. What is the Families First Coronavirus Response Act (H.R 6201)?

- The Families First Coronavirus Response Act (FFCRA) provides temporary new authority and broad flexibility for the USDA and states to adapt SNAP to address many people's food needs during the current public health and economic emergency triggered by the COVID-19 pandemic.
- FFCRA was signed on March 18, 2020. It:
  - Creates a new benefit, P-EBT, that allows states to provide families whose children rely on free or reduced-price school meals with resources to purchase food when schools are closed for more than 5 days due to COVID-19.
  - Allows states to temporarily raise SNAP benefits to all households to the maximum level allowed for household size.
  - Temporarily suspends the work requirement for Able-Bodied Adults Without Dependents (ABAWDs), which normally limits SNAP benefit access for people ages 18-49 to 3-months in a 3-year period unless they work at least 20 hours/week, participate in qualified workfare programs or are exempted.
- The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed on March 27, 2020. It provides \$15.5 billion for the SNAP program to cover costs associated with the administration and implementation of the SNAP flexibilities granted under FFCRA, as well as the increased expenditures resulting from growth in SNAP participation due to the pandemic.

## 2. Where can I find a summary of the FFCRA?

- The House Appropriations Committee has posted <u>a summary</u> of the FFCRA.
- The Center on Budget and Policy Priorities has posted a detailed <u>resource</u> on P-EBT, CR-SNAP, and other SNAP flexibilities and waivers authorized under FFCRA.
- The Kaiser Family Foundation developed <u>a summary</u> of the key provisions of the FFCRA.

#### 3. What is Pandemic-EBT?

- Pandemic-EBT (P-EBT) is a state option to provide food benefits to children who have temporarily lost access to free and reduced-price meals at school due to COVID-19 triggered school closure. Schools must be closed for at least 5 consecutive days due to the pandemic for the benefit to be available. For SNAP households with children, the benefit will be issued on their existing EBT cards. For non-SNAP households with children, a new benefits card will be issued. The benefit amount will be no less than the value of school meals at the free rate over the course of five (5) school days for each eligible child in the household.
- The FFCRA establishes information sharing between state agencies as a necessary tool
  to implement P-EBT. Therefore, state educational agencies and school food authorities
  are required to share data with SNAP administering agencies such as the list of free and
  reduced-price meals eligible children.

### 4. Who is eligible for P-EBT?

- SNAP and non-SNAP households with one or more children who have temporarily lost
  access to free or reduced-price meals at school due to pandemic-related school closures
  lasting 5 or more consecutive days are eligible to receive P-EBT. This includes all
  children enrolled at schools implementing the Community Eligibility Provision (CEP).
- USDA guidance on P-EBT is <u>here</u>.

### 5. What must states do to implement P-EBT?

- States must develop and submit implementation plans to USDA for approval. The plan is
  expected to include details on how states will address issues such as: obtaining school
  enrollment data from local education agencies to identify eligible children; issuing P-EBT
  benefits for existing SNAP households; setting up new cases and issuing cards and PEBT benefits to non-SNAP households; outreach and data matching. States should
  develop the implementation plan in coordination with state and local educational and
  human services agencies that administer programs such as Medicaid, SNAP, TANF and
  other means-tested programs to ensure all children that are eligible for free and
  reduced-price meals are identified and enrolled.
- We recommend states conduct robust public outreach to maximize P-EBT program participation among eligible households with children. Outreach is especially vital to identify eligible non-SNAP participating households with children.
- Please contact the USDA for any additional guidance in the development of your state's P-EBT implementation plan.

### 6. What guidance is available from USDA on P-EBT?

- On March 20, 2020, the USDA issued this memo as guidance for state agencies to help clarify what should be in their P-EBT plans. State agencies are required to submit a plan to the USDA that describes:
  - How eligibility for P-EBT will be determined.
    - State agencies must address how they will obtain enrollment data from school districts to determine which children are eligible to receive P-EBT benefits. For children who are currently in SNAP households, states must match the child to their existing SNAP case.
  - How the monthly allotment of P-EBT will be calculated.
    - Example: A x B = C

A	В	
<u>Meal</u>	# of cancelled school days in	Allotment for
	(month)	(Month*)
Breakfast \$2.20	20	\$44.00
Lunch \$3.43	20	\$68.60
	Total	\$112.60

С

- A = FFCRA makes it clear that the household allotment amount can be no less than the value of school meals at the Federal reimbursement rate for breakfast and lunch at the free rate for each eligible child.
- B = The number of canceled school days that month.
  - Since school districts within the state may vary on the number of canceled school days, states may use an average date for all schools for the end of the school closures and/or an average of canceled school days.
  - Calculations for the remaining months of the school year (March, April, etc) will vary.
- C = The total calculation is for each eligible child within the household.
- In developing the P-EBT implementation plan, states are required to indicate which month will be the first month of P-EBT benefits.
- How P-EBT will be electronically issued.
  - For SNAP households, states can use existing case information to issue the benefit. Therefore, states could issue the P-EBT benefit without contacting eligible households.
  - For Non-SNAP households, the guidance establishes an application or "opt-in" requirement where households must submit an application so that a P-EBT case can be set up in the State's eligibility system and benefits can be issued. The application will need to include basic household information in order to participate.
  - A household application is not required if the necessary data is readily available to identify non-SNAP households such as from existing school meal applications. In that case, states may propose alternate procedures such as issuing P-EBT benefits without contacting households.
  - All P-EBT benefits will be issued on an EBT card. The benefit can be issued retroactively from the date of application and/or eligibility.
    - For SNAP households the P-EBT benefits will be delivered on their current EBT card. A separate EBT card will not be issued.
    - For non-SNAP households, a new EBT card will be delivered on the first month of P-EBT benefits. For subsequent months the P-EBT benefits will be electronically issued onto their EBT card.
- USDA's guidance underscores that states should conduct a public information campaign, alerting P-EBT recipient households on the purpose of P-EBT and how it can be used.

# 7. If my state implements P-EBT, will my school or sponsoring organization still be able to serve non-congregate meals?

 Yes, schools or sponsoring organizations may serve non-congregate meals, while also implementing P-EBT.

#### 8. Is P-EBT available to children who are affected by child care closures?

• At this time, no, P-EBT is not available to children affected by the closure of their child care center or other child care provider.

#### 9. Which states have been approved for P-EBT?

- Currently, a number of states are working to finalize their state P-EBT implementation plans. For example, USDA has approved the P-EBT implementation plans of 35 states including the District of Columbia: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Indiana, Illinois, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, New Hampshire, New Mexico, New Jersey, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, Tennessee, Texas, Vermont, Virginia, West Virginia\_Wisconsin, and Wyoming. We strongly encourage states to submit plans as quickly as possible and implement P-EBT to ensure that low-income children that have lost free and reduced-price meals due to school closure have access to meals. This is a vital policy tool available for states to ensure that no child goes hungry during school closure. While school and community meals are important, not every child can make it to a meal distribution site. By providing families with resources to purchase food, P-EBT can feed children at scale and allow families to minimize trips away from home.
- See the USDA website for an updated list of approved states here and FAQ on P-EBT.

#### 10. What are the CR-SNAP benefit increases authorized by FFCRA?

- SNAP households are eligible for an additional emergency food supplement when the Secretary of Health and Human Services has declared a public health emergency under section 319 of the Public Health Service Act related to an outbreak of COVID-19 or when a State has also issued an emergency or disaster declaration. This is also called CR-SNAP.
- CR-SNAP is a state option to issue emergency allotments (increased benefits) to households receiving SNAP.
- The law provides for an additional allotment for all households up to the amount of the maximum benefit for their household size.
- USDA guidance on Emergency SNAP allotment is <u>here</u>, and state by state data is <u>here</u>.

#### 11. Who is eligible for CR-SNAP?

 Only SNAP participants who are currently receiving lower than the maximum benefit amount for their household size will be eligible.

# 12. Are families receiving P-EBT for their children also eligible to receive CR-SNAP authorized by the FFCRA?

Yes, families can receive benefits from both P-EBT and CR-SNAP.

#### 13. How much is the CR-SNAP allotment?

Eligible SNAP participants will receive an increase up to the maximum benefit amount for two months. Contingent upon the availability of funding and ongoing need, USDA may approve additional months of emergency issuance with an extension request from the State. The

following table shows the current maximum monthly SNAP allotment based on household size. (See USDA SNAP Eligibility Guidance <a href="here">here</a>)

People in Household	Maximum Monthly Allotment*
1	\$194
2	\$355
3	\$509
4	\$646
5	\$768
6	\$921
7	\$1,018
8	\$1,164
Each additional	+ \$146
person	

<sup>\*</sup>These allotments are for households in the 48 contiguous states and the District of Columbia.

For example, under current law, a family of four with a monthly net income of \$1,115 will
only be eligible for \$311 in SNAP benefits per month (after the 30% standard deduction
from net income). Under FFCRA, the same family size will receive the full \$646 monthly
SNAP benefit for up to a maximum of 2 months without any deductions.

#### 14. How will CR-SNAP be issued?

- States have flexibilities on how to issue the CR-SNAP benefits. It can be issued in one of the following ways:
  - On one specific day of the Month (starting in March)
  - Over a series of days (for example, over the course of 5 consecutive days starting at the beginning of each month)
  - Staggered disbursement (for example, throughout multiple weeks during the month)
  - Other
- All states and US territories (except Puerto Rico) are approved to issue the emergency
  maximum SNAP benefit level to existing SNAP households. The original USDA approval
  was limited to two months, March and April or April or May depending on when states
  requested to implement it. USDA now will approve states request to continue to issue
  the maximum SNAP benefit level to eligible SNAP households each month if one or
  more of the following conditions are met:
  - The State's emergency or disaster declaration or the Federal Public Health Emergency Declaration remains active, and
  - Residents of the State are confirmed to have contracted Covid-19
  - Some or all areas of the State are containment or quarantine zones
  - o Businesses have closed or significantly reduced their hours
  - The State's residents have experienced economic impacts due to job suspensions or losses
  - The State's residents have been directed to practice social distancing
- USDA guidance on extension of the SNAP emergency allotment is <u>here</u>.
- States are not required but strongly encouraged to notify SNAP participants who will receive CR-SNAP.

### 15. Which states have been approved for CR-SNAP?

 All states including US territories (except Puerto Rico) have started implementing their USDA approved CR-SNAP implementation plans. States are required to submit a preliminary report to USDA on the total value of the emergency allotments issued and the number of households for whom the emergency allotment is issued. The full list of approved states is available at the USDA website here.

# 16. Are states required to submit waiver requests on work requirements for Able-Bodied Adults Without Dependents in SNAP?

- No. The FFCRA includes a nationwide waiver, automatically and temporarily suspending the 3-month time limit on SNAP benefits for adults without children under age 50, also called Able-Bodied Adults Without Dependents (ABAWDs). This is effective from April 1, 2020, and will remain in effect until the pandemic designation is lifted. USDA is not required to issue additional waivers or guidance. States are not expected to submit a plan to exercise this flexibility during the pandemic designation.
- USDA guidance on the ABAWDs waiver is <u>here</u>.

# 17. What additional SNAP operational and administrative flexibilities are available to states under FFCRA?

- The FFCRA gives USDA authority to allow states to make changes to their normal SNAP operations such as those related to SNAP benefit issuance, application processes, and reporting or quality control requirements to address operational challenges caused by the COVID-19 outbreak. This also allows states and state agencies to implement social distancing guidelines to minimize caseworkers and SNAP recipients' risk of exposure to the virus.
- We encourage states to utilize the following flexibilities: (For more information on these
  options and recommendations see the CBPP resource <a href="here">here</a>)

#### For current SNAP households

- Extend certification periods by at least 6 months. Every month states must recertify
  SNAP households whose benefits are expiring. This requires households to complete an
  application, an in-person or telephone interview, and provide several documents to verify
  their eligibility so there is no disruption in the issuance of their SNAP benefits. If a
  household fails to complete this process, they must reapply and wait up to 30 days for
  their benefits to be issued.
- Suspend recalculation of SNAP benefits when a household has a change in income.
  When someone in a SNAP household loses their job, the state recalculates their SNAP
  benefit based on the new lower income. This allows the household to receive a higher
  SNAP allotment. If states were permitted to increase SNAP benefits for all households
  for several months, states could focus on their efforts on processing new applications.

#### For new applications

- Waive the requirement that applicants be interviewed by a state eligibility worker.
   Federal law requires states to interview households via telephone or in-person at the initial application and at least once a year thereafter. For cases that can proceed without a full interview, a state should be permitted to waive this requirement.
- Relax telephonic signatures. Most states have the capability to accept telephonic
  signatures for applications processed over the telephone. For states who do not have
  this technology and for applicants without access to a telephone and the internet, states
  should be permitted to sign on the applicants' behalf without having to record their
  telephone conversation.
- Ease paper verification requirements. Federal law requires applicants to submit several verification documents such as pay stubs and utility bills. States should be permitted to temporarily waive these documentation requirements.
- Expand the expedited benefits criteria. Federal law requires states to process an application and issue benefits within 7 days for a household with extremely low income and resources, a process called expedited benefit. States should be permitted to expedite benefits to all types of household applications.
- Expand the use of trusted application assisters. Some community-based organizations
  assist the household with filing an applicant online. States should be permitted to allow
  applications that are not complicated coming from a trusted community-based
  organization to be approved.
- Determine income based on current circumstances. Eligibility is determined by the
  month of the application. For households that have experienced a change in income due
  to job losses and submitted an application in March, USDA could allow states to look at
  the applicants' anticipated income.

### For both new and re-enrollment applications

- Flexibility with the timing of issuing benefits. For states that are considering more
  extreme measures of social distancing such as enforceable "stay at home" orders, the
  state could issue benefits earlier than the next scheduled date to allow households to
  stock up on food, facilitating compliance with social distancing measures and mitigating
  shortages when there are disruptions in the food supply chain.
- Flexibility with the timing of issuing EBT cards. States may need to change how they
  administer new EBT cards to households so that a household can receive their EBT card
  within 7 business days or less than the standard 30 days wait time from the date of
  certification to receive the benefit.
- Allow purchases of hot foods and other noneligible foods. Federal law prohibits SNAP
  benefits to be used to purchase hot foods such as prepared foods in a grocery store or
  restaurant meals. States should be permitted to temporarily waive this requirement due
  to disruptions in the food supply chain transporting food to retail settings.
  - For example, **Texas** and **Louisiana** have requested USDA to approve their plans to allow SNAP beneficiaries to utilize SNAP benefits in eligible restaurants.
  - Arizona and North Carolina have requested USDA to approve their plans to allow SNAP beneficiaries to utilize their SNAP benefits to purchase hot foods from groceries.

### 18. Is the use of SNAP EBT cards to purchase food online allowed?

- Yes, but only if your state is participating in the USDA SNAP Online Purchasing pilot. USDA started the Online Purchasing pilot program in April 2019 and it has been operational in 6 states: Alabama, Nebraska, New York, Iowa, Oregon, and Washington State. Thirty-one new states were added in the pilot over the last few weeks: Arizona, California, Colorado, Connecticut, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, Nevada, New Mexico, North Carolina, Kentucky, Oklahoma, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, West Virginia, Wisconsin, Wyoming, Vermont, and Virginia.
- USDA is seeking to expand the pilot during the pandemic due to social distancing requirements. States should proactively submit a request to USDA for approval so that SNAP recipients in their states can purchase eligible foods online using their EBT cards from approved retailers. This would help reduce the virus exposure risk for SNAP recipients and grocery staff while facilitating the implementation of social distancing guidelines.
- Please see USDA's FAQ on SNAP waivers and flexibilities here.

# 19. Where can I find a full list of nationwide waivers issued by USDA on SNAP and Child Nutrition Programs?

The USDA has started issuing nationwide waivers to provide flexibility across all federal
and child nutrition programs. You can find a full list of these waivers <a href="here">here</a>. Please note
that the USDA website is continually updated, so check back frequently. This FAQ will
be updated accordingly.

## **Additional resources**:

#### Summary of current COVID-19 Child Nutrition Program Response Nationwide Waivers

 http://bestpractices.nokidhungry.org/resource/summary-current-covid-19-childnutrition-program-response-nationwide-waivers

# FAQs on Child Nutrition Program Options Available During School Closures Related to the Coronavirus

 http://bestpractices.nokidhungry.org/resource/faqs-child-nutrition-program-optionsavailable-during-school-closures-related-coronavirus

# **Emerging Strategies & Tactics for Meal Service During School Closures Related to Coronavirus**

 http://bestpractices.nokidhungry.org/resource/emerging-strategies-tactics-mealservice-during-school-closures-related-coronavirus

# Comparison of Usual Summer and Afterschool Meal Requirements to Current COVID-19 Flexibilities

<a href="http://bestpractices.nokidhungry.org/resource/comparison-usual-summer-and-afterschool-meal-requirements-current-covid-19-flexibilities">http://bestpractices.nokidhungry.org/resource/comparison-usual-summer-and-afterschool-meal-requirements-current-covid-19-flexibilities</a>