

## **Instructions for Determining Eligibility for P-EBT in School Year 21-22**

### **Purpose**

This document outlines how schools should determine each student's eligibility for the P-EBT benefit in Vermont during the 2021-22 school year. To qualify, school buildings must be eligible (Requirement 1), students must be eligible for free or reduced-price meals (Requirement 2), and students must be eligible because they had an excused COVID-19-related absence or were impacted by a COVID-19-related school closure that month (Requirement 3).

All three requirements must be met for the student to be eligible to receive P-EBT benefits for that month.

### **Requirement 1: School Building Eligible**

Before evaluating whether individual students are eligible for P-EBT, the school building must first be established as eligible. For the building to be eligible, the school must normally offer meals through the National School Lunch Program (NSLP), and the school must have experienced a closure or reduced attendance or hours for five (5) days or more this school year due to a COVID-19-related reason. Both must be true for the school building to meet Requirement 1.

#### **Establishing That the School Normally Participates in the NSLP**

Any school currently operating the Seamless Summer Option (SSO) or the regular NSLP would be considered to normally be participating in the NSLP. Daycare or non-profit sites operating the SSO this year only under a School Food Authority sponsor are not eligible if they would not normally be eligible to operate the NSLP.

#### **Establishing Five Days of Consecutive Closure or Reduced Attendance**

The school building must have experienced either a COVID-19-related school closure of 5 consecutive days or more or have experienced reduced attendance or reduced hours for 5 consecutive days or more. Reduced attendance is defined as having 1 or more students absent for a COVID-19-related reason. To qualify as reduced attendance, different students may be absent during the 5-day period. The same student does not need to be out for 5-consecutive days to qualify the school for reduced attendance.

Most Vermont schools will have met this requirement sometime in September 2021 due to having one or more students absent for a COVID-19-related reason for 5 consecutive days. The first day in the 5-day period is the date that the building becomes eligible.

### **Contact Information:**

If you have questions about this document or would like additional information please contact:  
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Students who meet requirements 2 and 3 are not eligible for P-EBT benefits before the date that the building becomes eligible. P-EBT officials should determine the building eligibility date for each building in their School Food Authority (SFA) and record that date for later reporting to the state. If there is any confusion about what constitutes a building, please refer to how sites are listed in the Harvest online application system for that SFA. Each school site in the application packet would be considered a building. Special sites operating the SSO for this year only, like day care or non-profit sites, are not eligible if they would not normally be eligible to participate in the NSLP.

## **Requirement 2: Eligible to Receive Free or Reduced-Price Meals under the NSLP**

This year, meals are free to all children 18 and under at most schools using the Seamless Summer Option (SSO). However, these free meals do not qualify students to receive P-EBT. Instead, the student needs to be eligible for free or reduced-price meals under the normal National School Lunch Program (NSLP) operations that the school would have operated if not for COVID-19.

### **Schools that Normally Operate a Pricing Program under the NSLP**

Students meet this requirement under the following circumstances:

- The student was eligible for free or reduced-price meals in SY19-20 or SY20-21, either through an application or direct certification, and the household has not submitted a new application for this school year (carry-over eligibility).
  - Note: For all schools operating the SSO this school year, the first 30 operating days of the NSLP have not yet started to elapse. As a result, SY19-20 and 20-21 determinations are still in effect for these students for the entirety of this school year unless new applications are submitted by the household.
- The student transferred from a school with a CEP, Provision 2, or non-pricing program anytime since March 2020 and a new application has not been submitted (carryover eligibility).
- The student has been determined eligible for free and reduced-price meals this school year because the household submitted a new application or because they were directly certified this year.
  - Applications for free and reduced-price meals received and approved at any point during the year qualify the student under Requirement 2 for the entire year.

### **Schools That Normally Operate CEP, Provision 2 or a Non-Pricing Program under the NSLP**

All students enrolled at Community Eligibility Provision (CEP), Provision 2 (Lunch), or non-pricing programs meet Requirement 2. This includes:

- Schools who were operating one of these programs in School Year 19-20.
- Schools who intended to start operating CEP, Provision 2 (Lunch), or a non-pricing program in SY20-21 or SY21-22. A letter of intent submitted prior to the start of the school year or an application in the CNPWeb or Harvest system submitted prior to the

start of the school year showing these options will signify that the school intended to start operating this way.

Note: USDA has specified that schools operating Provision 2 for breakfast only should make individual student determinations based on student eligibility for free and reduced-price lunch.

### **Requirement 3: Student had COVID-19-Related Absence or Experienced Closure That Month**

The final eligibility requirement to receive P-EBT benefits in a given month is that the student had an excused COVID-19-related absence or experienced a COVID-19-related school or classroom closure that month. This requirement is determined on a monthly basis. If a student had one or more absence or closure days in a particular month and the other requirements have been met, then they are eligible to receive P-EBT benefits for that month. There is no need to report the exact number of absence or closure days in a particular month, as long as it was at least one day during that month.

#### **COVID-19-Related School Closure**

P-EBT officials should first review any COVID-19-related school closures that happened during the year. If the building has qualified under Requirement 1, then any students who qualify under Requirement 2 would be eligible for P-EBT in any months that there was a COVID-19-related school closure, and there would be no need to look further for absence or classroom closure data for that month. A COVID-19-related school closure includes:

- Closure of the school while contact tracing or testing was performed.
- Closure of a school because attendance fell too low as a result of COVID-19 illness or need to quarantine, or because of high case counts among students and staff.
- Closure of a school because of staffing shortages caused by COVID-19 illness and quarantine among staff and their household members. This includes transportation and food service staff or contractors, or other necessary service providers.
- Closure of the school for COVID-19-related activities, such as vaccination clinics or other COVID-19-related activities.
- A move to remote-learning as a result of any of the above is also considered a COVID-19-related school closure.

This is not an exhaustive list. Schools should consult with AOE Child Nutrition Programs about other reasons for closure that may be deemed COVID-19-related. School closures as a result of weather (snow days) or facilities issues (water leak, etc.) would not qualify as a COVID-19-related closure.

#### **COVID-Related Classroom or Grade Closure**

P-EBT officials should then review any classrooms or grades that were closed for a COVID-19-related reason. A COVID-19-related classroom or grade closure includes classroom or grade closures for any of the reasons listed above in COVID-19-related school closure.

## Excused COVID-19-Related Absence

For any students who would have received free or reduced-price meals at school (those students meeting Requirement 2) and not already determined eligible through school, grade or classroom closures for a particular month, P-EBT officials should determine if those students had at least one excused COVID-19-related absence that month. An excused COVID-19-related absence qualifies those students for P-EBT for that month. COVID-19-related absences could include:

- Absence due to COVID-19-like symptoms, with or without a positive test.
- Absence due to quarantine requirements as issued by the Vermont Department of Health. These include positive test, symptoms, or close-contact status of the student or others in their household.
- Absence due to need to quarantine before/after travel or to protect vulnerable household or family members.
- Absence due to need to complete contact tracing.
- Absence to receive COVID-19 vaccination or as a result of symptoms related to COVID-19 vaccinations.
- Absence due to transportation barriers resulting from a COVID-19-related reason.
- Students who cannot attend school because paraeducators or other support staff assigned to that student are not available for a COVID-19-related reason.
- Medically vulnerable students needing to reduce risks of exposure to COVID-19.
- Students who are not physically at school for any of the above reasons but are engaged in school through remote learning conducted by school staff or contracted staff.
  - See questions 17-19 of USDA's [P-EBT Q&A – SY 2021-22](#) for more on eligibility of students engaged in virtual learning.

The above list is not exhaustive. School COVID coordinators or P-EBT officials may make determinations about other COVID-19-related absences. In making these determinations, consider whether the student would have attended school if not for the existence of COVID-19.

School policies dictate what constitutes an excused absence. Per USDA guidance, unexcused absences do not qualify the student for P-EBT benefits, even if they were COVID-19-related.

## Students Who Are Not Eligible

The following groups of students are not eligible for P-EBT for School Year 21-22:

- Students attending schools that normally operate pricing programs (programs that are not CEP or Provision 2 lunch) and have a “paid” status in those programs.
- Students who have graduated or un-enrolled in school.
  - Students who un-enrolled or graduated part way through the year are eligible for months in which they were enrolled.
- Students enrolled in home study.
- Children not yet enrolled in school (including younger siblings of enrolled students).

- Students attending schools that do not normally participate in the NSLP.
- Students enrolled in virtual learning academies that do not normally participate in the NSLP. See questions 17-19 of USDA's [P-EBT Q&A – SY 2021-22](#) for more on eligibility of students engaged in virtual learning.