

Instructions for Determining Eligibility for P-EBT

Purpose

This document outlines how schools should determine each student's eligibility for the P-EBT benefit in Vermont. To qualify, students must be both eligible for free meals (Requirement 1), and eligible based on learning modality for that month (Requirement 2). Both requirements must be met for the student to be eligible to receive P-EBT benefits for that month. The student's type of learning modality under Requirement 2 will impact whether the student receives a full, partial or no benefit for that month.

Requirement 1: Eligible to Receive Free or Reduced-Price Meals under the National School Lunch Program

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

Requirement 1 in 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 last year, either through an application or direct certification, and the household has not submitted a new application for this school year.
- The student has been determined eligible for free and reduced meals this school year because the household submitted a new application or because they were directly certified this year.
 - If the new application is received and approved prior to April 1, 2021, then the eligibility extends back to the start of the school year. For new applications received and approved after April 1, 2021, the student qualifies for the month in which the application was received and any subsequent months. For example, if the application is received May 15, 2021, the student will qualify for May and June only.
- The student transferred from a school with a CEP, Provision 2, or non-pricing program at the beginning of this school year, or partway through this school year.

Note: For all schools operating the SFSP this school year, the first 30 operating days of the NSLP have not yet started to elapse. As a result, last year's determinations are still in effect for these students for the entirety of this school year unless new applications are submitted by the household.

Requirement 1 in Schools that Normally Operate CEP, Provision 2, or a Non-pricing Program under the NSLP

All students enrolled at Community Eligibility Provision, Provision 2, or non-pricing programs meet this requirement. This includes:

- Schools who were operating one of these programs in School Year 19-20
- Schools who intended to start operating CEP, Provision 2 or a non-pricing program this year. A letter of intent submitted prior to the start of the school year, or an application in the CNPWeb 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 1 in Schools that Did Not Previously Operate the NSLP, but Planned to Start in School Year 20-21

Several Vermont schools had intended to start the NSLP for the first time this school year. The timing of the extension of the SFSP waivers meant that these schools were in varying stages of program implementation when they decided to switch to the SFSP. Students at these schools are eligible to participate in P-EBT following the criteria under the above sections if either:

- The school signified their intent to participate by submitting an application in the CNPWeb system prior to the start of the school year.
- The school submits a signed statement from the Head of School to AOE Child Nutrition Programs attesting they had intended to participate in the NSLP this school year, intend to participate in the NSLP next school year, and are using the SFSP to offer meals to students this school year.

These schools will need to collect free and reduced meal applications and gather direct certification information immediately. If the information is collected prior to April 1, 2021, student eligibility will extend back to the start of the school year.

Requirement 2: Learning in a Remote or Hybrid Model for that Month

The second requirement is that the child did not have the opportunity to eat meals at school on some or all days of the particular month because they were learning remotely on some or all school days. For each student, each month, the school will need to determine what the student's learning modality was for the majority of the month. For the purposes of P-EBT, there are three categories: Remote, Hybrid or In-Person.

- Remote students will receive the maximum P-EBT benefit.
- Hybrid students will all receive the same partial benefit. Vermont is using a simplifying assumption to calculate an average benefit level to use for all hybrid students, based on the average number of days of in person and remote instruction across all Vermont

schools. The exact number of in person vs. remote days for hybrid students will not impact the amount of the individual student's benefit.

- In-Person students will receive no benefit for that month.

Note: The fact that students had access to meals that were provided for consumption at home, either through pickup or delivery, has no impact on a student's eligibility. Students are eligible even if they had access to the meals provided for remote learning days, and they do not need to stop accessing meals for remote learning days in order to receive the P-EBT benefit.

Determining Remote Status for Requirement 2

A student is considered "remote" for the month under any of the following circumstances:

- The entire school is
 - continuously remote for the month.
 - continuously remote for the majority of the school days in the month.
- The student is learning in a continuously remote learning model for
 - the entire month (e.g. because of parental choice)
 - the majority of the school days in the month (e.g. because of COVID-19 or need to quarantine).
- The student's classroom or grade level is in a continuously remote status for the majority of the school days in the month (e.g. because of need for quarantine and/or contact tracing).

"Continuously remote" means that the school is in remote learning without weekly scheduled in-person days.

Determining Hybrid Status for Requirement 2

A student is considered "hybrid" for the month under any of the following circumstances:

- The entire school, the student's classroom/grade or the individual student is using any of the following, or similar hybrid models during the month:
 - In-Person learning 4 days per week, remote learning 1 day per week
 - In-Person learning 3 days per week, remote learning 2 days per week
 - In-Person learning 2 days per week, remote learning 3 days per week
 - In-Person learning 1 day per week, remote learning 4 days per week
 - Regular cycle of 5 days of in person learning, followed by 5 days of remote learning
- The student, classroom or school has switched back and forth between continuously remote and in-person learning during the month, but the majority of the school days in the month were not continuously remote.

Note: Some schools are in person for 4.5 days, with one afternoon (usually Wednesday) of remote learning. If the student has access to both breakfast and lunch at school on those days, this would not be considered hybrid for the purposes of P-EBT.

Determining In-Person Status for Requirement 2

Students who don't qualify as remote or hybrid as described above are attending school in-person every day. Students in in-person status for the month do not qualify for the P-EBT benefit for that month, even if they meet Requirement 1.

If the student is absent from school, but not learning remotely that day, they are still considered "in-person." Generally, schools do not need to look at student absences when determining learning modality. However, schools have the discretion to determine that a long-term absence as a result of COVID-19 or quarantine should be considered remote for the purposes of P-EBT.