



#043-22

Commonwealth of Virginia
Virginia Department of Education
Superintendent's Memo #043-22

DATE: February 18, 2022
TO: Division Superintendents
FROM: Jillian Balow, Superintendent of Public Instruction
SUBJECT: **Pandemic Electronic Benefit Transfer in School Year 2021-2022**

This memorandum provides notification to local educational agencies (LEAs) of Virginia's approved **Pandemic Electronic Benefit Transfer (P-EBT) plan** for the 2021-2022 school year (SY). Included are details of the new school and student eligibility requirements for P-EBT; the LEA reporting requirements, new data definitions document, and schedule; and notification of the upcoming required P-EBT training webinar.

The Virginia Department of Social Services (VDSS) is Virginia's lead agency for P-EBT. The Virginia Department of Education, Office of School Nutrition Programs (VDOE-SNP) staff are working in conjunction with VDSS staff to implement P-EBT and provide communication and training to LEAs. The U.S. Department of Agriculture (USDA), as authorized by the Families First Coronavirus Response Act of 2020 (FFCRA) and the American Rescue Plan Act of 2021, approved Virginia's P-EBT plan for the 2021-2022 SY.

Through P-EBT, eligible students attending an eligible school may qualify to receive temporary emergency nutrition assistance benefits loaded to EBT cards used to purchase food when their access to meals provided at school is limited due to COVID-19 related reasons. In Virginia, Senate Bill 1303 (SB1303) mandates that all schools provide 180 days or 990 hours of in-person instruction to each student during the 2021-2022 SY, except when health conditions necessitate classroom or school closures to address the level of COVID-19 transmission.

Pursuant to SB1303, LEAs should anticipate student eligibility for P-EBT would be significantly less than in prior years due to the return to full-time in-person instruction. However, there will likely be P-EBT eligible schools and eligible students in every LEA for some period during the current school year.

School Eligibility for P-EBT

To meet the eligibility requirements for any student to receive P-EBT, a school must:

- be operating during a federal public health emergency declaration due to COVID-19,
- be eligible to participate in the USDA National School Lunch Program (NSLP), and
- be closed or operating at reduced hours or reduced attendance for five consecutive days in SY 2021-2022 due to COVID-19 related reasons.
 - Once a school meets the minimum five consecutive day threshold during SY 2021-2022, it remains eligible for the duration of the federal public health emergency declaration in the current school year.
 - Eligible students may receive P-EBT for the month in which the school meets the eligibility requirements and any subsequent month in which the student meets the individual eligibility requirements.

A school is considered closed if the school does not offer in-person learning to any students for the period of five consecutive school days due to COVID-19 related reasons such as exposure, quarantine, illness, or high levels of transmission. A school may be considered operating at reduced hours or reduced attendance for five consecutive days if any student is absent from school or temporarily receiving synchronous or asynchronous remote learning provided by a teacher employed by the LEA due to COVID-19 related reasons. A school that provides full-time virtual learning, such as Virtual Virginia (VVA) or a multidivisional online provider (MOP) is not eligible to participate in the NSLP and does not meet the requirements for P-EBT, even if students are considered as enrolled in the local school for other purposes.

Student Eligibility for P-EBT

Individual students who attend a school that meets the P-EBT eligibility threshold once in the current school year would be eligible for P-EBT benefits in that month and any subsequent

month in which they meet the following conditions by the designated as of date for the P-EBT data file.

The student must:

- be determined free or reduced-price eligible, by direct certification or meal application, for meals in the USDA NSLP or be attending a Community Eligibility Provision (CEP) approved school, and either;
- be receiving full-time remote instruction from a teacher(s) employed by the NSLP participating school or school division, or,
- be documented as absent from school due to COVID-19 related reasons, whether or not they receive remote instruction during their absence.

Students enrolled in and attending full-time virtual schools, such as VVA or a MOP, do not meet the USDA P-EBT eligibility requirements and are not eligible to receive P-EBT in SY 2021-2022.

LEA Data Reporting for P-EBT

The eligibility and reporting requirements for P-EBT have changed for SY 2021-2022 compared to the prior eight rounds of P-EBT provided since May 2020. These changes required updates to the data definitions, file format, as of dates, file submission due dates, and one new report.

A new report of school eligibility is required for SY 2021-2022. LEAs will report to the VDSS the date the school met the five consecutive days of closure or reduced hours or attendance due to COVID-19 in this report. The details of the report and a template will be provided in a separate communication to local SNP contacts after the P-EBT webinar.

The new P-EBT student file data definitions and due dates document for SY 2021-2022 is Attachment A to this memorandum. While the new file format is similar to previous versions, several minor and two significant changes were required. A new Column O was added to report the state-assigned four-digit school number of the school the student attends. Column M was changed to report a new data element; see below. Review the complete data file layout in the first tab of the spreadsheet and the as of and file due dates in the second tab of

the spreadsheet. Note the changes and updates in all columns, data fields, and acceptable data examples.

The data required in Column M has changed to reflect the new student requirement. Column M now requires the LEA to report a code (*L*, *M*, or *H*) for COVID-19 related student absences or remote learning in the reporting month. The student's P-EBT record will indicate the following for COVID-19 related absences or remote learning during the reporting month:

- *L*, for 1-5 days absence or remote learning due to COVID-19, or
- *M*, for 6-15 days absence or remote learning due to COVID-19, or
- *H*, for 16+ days of absence or remote learning due to COVID-19, or full-time remote learning provided by LEA teachers, regardless of actual number of days in the month.

The *L*, *M*, and *H* designations are critical, as they will be used by the VDSS to calculate the amount of P-EBT benefits provided for the month based on the USDA approved tiers. LEAs should use available data to report on school eligibility and individual student eligibility for P-EBT. LEA considerations for circumstances related to COVID-19 attendance tracking and instructional disruptions are found in [Superintendent's Memo #188-20](#) and [Superintendent's Memo #230-21](#).

All LEA reports and data for P-EBT will be submitted via the DSS Managed File Transfer (MFT) portal by the designated valid user(s). Valid users for MFT are typically the local Student Information System (SIS) contact and the local SNP contact. LEAs should notify the VDOE of any changes in valid users by contacting Lynne Fellin via email at Lynne.Fellin@doe.virginial.gov.

Required Webinar Training

LEA staff responsible for P-EBT data and program implementation are requested to register for and attend a required P-EBT training webinar. A webinar recording will also be provided by email to the local SNP contact for those who are unable to attend live. [Register for the P-EBT webinar](#) on Thursday, February 24, 2022, from 2:00-3:00 p.m.

For more information

Additional details of federal P-EBT requirements for SY 2021-2022 can be found in the [USDA P-EBT Questions and Answers \(Q&A\) Memo](#), dated August 26, 2021, and the [USDA P-EBT Q&A Addendum](#), dated January 21, 2022.

For questions or additional information about Virginia's P-EBT plan, please contact Lynne Fellin, SNP Technical Advisor to the State Director, via email at Lynne.Fellin@doe.virginia.gov or by telephone at (804) 225-2717.

JB/SCC/LAF

- A. Attachment: [School Year 2021-2022 P-EBT Simplified Data File Layout and Schedule](#) (XLSX)