



MEMORANDUM

TO: SNAP State Agencies
Child Nutrition State Agencies

FROM: Lizbeth Silbermann, Acting Associate Administrator,
Supplemental Nutrition Assistance Program (SNAP)

Sarah Smith-Holmes, Acting Associate Administrator,
Child Nutrition Programs

DATE: September 8, 2022

SUBJECT: Pandemic EBT - Updated Guidance on Virtual Schools

USDA's Food and Nutrition Service (FNS) is updating its guidance to States on P-EBT eligibility for children who enrolled in non-NSLP-participating fully virtual institutions or began homeschooling since the start of the COVID-19 public health emergency (PHE) ([Click Here](#)).

USDA's previous guidance, contained in the Q&A document for school year (SY) 2021-2022 ([Click Here](#)), limited P-EBT eligibility to children who are currently attending NSLP-participating schools and sites. USDA's guidance for SY 2022-2023 ([Click Here](#)) recognizes that some children who are currently enrolled in non-NSLP-participating virtual schools, or are currently homeschooled, previously attended NSLP-participating schools that closed or reduced their attendance or hours due to concerns about a COVID-19 outbreak. These children, who would have received free or reduced priced meals at their NSLP-participating schools, enrolled in fully virtual institutions or began homeschooling, in response to COVID. In many cases, their NSLP-participating schools did not offer an alternative virtual option.

Consistent with previous guidance, states that submit P-EBT plans for SY 2022-2023 must ensure that eligible children can receive P-EBT benefits under the state plan. With today's update, this includes children who attended an NSLP-participating school that closed or reduced its days or hours due to concerns about a COVID-19 outbreak and enrolled in a fully virtual institution or began homeschooling at any time since the January 27, 2020, start of the PHE. These children are eligible if they would have received free or reduced-price meals at their NSLP-participating schools and are attending the virtual school or homeschool during the PHE.

At their option, states may extend P-EBT benefits to these children who in past school years were covered by approved P-EBT plans. While we encourage states to do this where feasible, this is a state decision. States that wish to broaden their previously approved plans may submit a plan amendment to USDA. The amendment would contain a description of the population of children who will receive benefits, an estimate of the number of children affected, the value of benefits, and an estimated benefit issuance schedule.

Please reach out to your FNS Regional Office with any questions.

Sincerely,

/s/ original signature on file

Lizbeth Silbermann
Acting Associate Administrator
Supplemental Nutrition Assistance Program

/s/ original signature on file

Sarah Smith-Holmes
Acting Associate Administrator
Child Nutrition Programs