Date: April 01, 2021

Attention: Food and Nutrition Services Managers and Supervisors

Subject: Pandemic EBT Card Issuance for Children under the Age of Six (6)

Priority: Information and Action

Dear County Directors of Social Services:

I. GENERAL INFORMATION

The Families First Coronavirus Response Act; Consolidated Appropriations Act, 2021 provides the Secretary of Agriculture authority to approve State agency plans to provide Pandemic Electronic Benefits Transfer (P-EBT) benefits for children under six (6) who are included in an active Food and Nutrition Services (FNS) case and not receiving P-EBT for school children. The North Carolina Department of Health and Human Services (DHHS) in collaboration with the North Carolina Department of Public Instruction (DPI) has submitted a plan and received approval from the United States Department of Agriculture (USDA) to implement P-EBT for children under six (6).

II. POLICY PROCEDURES

A. Eligible Children:

The State proposes to provide P-EBT benefits for children under six (6) for the months of October 2020 through June 2021 to Food and Nutrition Services (FNS) recipients with one or more children in their household who meet the following conditions:

1. The child was under age six (6) as of October 1, 2020.

2. The child was included in an FNS household that received benefits at any time since October 2021.

   a. If a household with a child under six (6) begins to receive FNS benefits after the initial date of issuance of the P-EBT benefits for children under the age of six (projected for May as of the date of this letter), the state will issue P-EBT benefits retroactively back to the first month of FNS eligibility.
b. If an active FNS household adds a newborn to their household, P-EBT benefits for that child will be issued retroactively back to the month of birth.

c. If a child turns six (6) while being served and is not picked up in the student P-EBT records, the state will continue to provide benefits to them through June 30, 2021 as long as they are otherwise eligible.

d. P-EBT benefits for children under six (6) will terminate with the last month of eligibility if the children are removed from the FNS household or the FNS case closes.

3. The child does not receive P-EBT for school students. Any child that receives P-EBT for school students is ineligible to receive P-EBT for children under six (6).

B. Eligible Children Selection:

North Carolina will use data from the NC FAST eligibility system along with school data from Department of Public Instruction (DPI) to determine P-EBT for children under six (6) eligibility and benefit level. All data matches will be run on a monthly basis to determine eligibility and P-EBT for children under six (6) benefit level.

North Carolina will exclude children who are already receiving P-EBT benefits for children in school to prevent over issuance by matching first name, last name, and date of birth.

There is no application for NC P-EBT for children under six (6) benefits. A letter will be sent to all households who are receiving subsidized child care and are not actively receiving FNS benefits to provide information on how to apply for FNS benefits online, by mail, or in person at their local department of social services.

C. Learning Modes:

To ensure that we are providing consistent benefits, the learning modes used with P-EBT for students will be used to determine the eligibility and benefit amount for the P-EBT for children under six (6). The learning mode will determine the P-EBT for children under six (6) benefit level issued each calendar month based on the operating schedule of one or more public schools in the county of residence and will apply to all eligible children under six (6).

1. In-Person Learning mode:
   All public schools in the county of residence are operating in-person 100% of the time.

2. Remote Learning mode:
At least one public school in the county of residence is operating under a 100% remote learning mode in the calendar month. Note: Greater than or equal to 17 school days remote in a month will also be considered 100% remote (see Remote Learning Mode Benefit Level below).

3. Hybrid Learning mode:
At least one public school in the county is operating with any combination of in-person and remote learning.

D. Benefit Levels:

In an effort to structure the program in a way that is easier to manage and more easily communicated to clients and stakeholders, North Carolina will issue P-EBT benefits for children under six (6) in two distinct amounts. The County DSS office’s address that has the FNS case will be used to determine the child’s county of residency. The child’s county of residency will be used to determine the public school system(s) that will be used to determine eligibility and benefit level. North Carolina will use the FNS county of residence for each child to determine benefit level. Benefit levels will be determined based on the following criteria:

- If one or more schools in the public school system(s) within the county is operating on a fully remote learning mode, the P-EBT amount for children under the age of six (6) residing in that county will be the remote learning benefit amount.
- If not eligible for the fully remote learning benefit amount and one or more schools in the public school system(s) within the county is operating on a hybrid learning mode, the P-EBT amount for children under the age of six (6) residing in that county will be the hybrid learning benefit amount.
- If all schools in the public school system(s) within the county are operating on an in-person learning mode, children residing in that county will not be eligible for P-EBT for children under the age of six (6).

Note: P-EBT for students uses attendance by school calendar and individual student calendars to determine benefit level. P-EBT for children under six (6) uses the county of residence to determine benefit level. Therefore, it is possible for a household that has one child under six and one child in school to receive different amounts for each child.

E. Months of Assistance Tentative Issuance Schedule:

May 2021:
The initial P-EBT multi-month issuance will be staggered over several issuance days (undetermined at this time) during the month of May. The initial issuance will be staggered over multiple days by using the last digit in the EBT account number.
The initial multi-month issuance will be for the months of October through March and will not be representative of the ongoing monthly benefit amount.

**June 2021 and Ongoing Issuances:**
P-EBT benefits will be issued retroactively in one-month increments. P-EBT for children under age six (6) issuances will be issued using the same schedule as the P-EBT for students monthly.

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**F. Issuing P-EBT Benefits to Households:**

The associated NC FAST case numbers for each child/group of siblings will be identified. These FNS cases will receive a supplement based on the household’s existing EBT card/account information.

**G. Notices:**

There are two notices that will be issued to FNS households.

1. **P-EBT for children under the age of six (6) notice for SY2020-2021.**
   This notice will inform current FNS recipients that they will be receiving P-EBT for children under six (6) on their current EBT card within the next 30 days.

2. **Non-FNS P-EBT for children under six (6) notice for SY2020-2021.**
   These individuals are not eligible for P-EBT for children under six (6) because they are not active FNS recipients. This notice will inform those that are currently receiving subsidized child care and not receiving FNS with information about the FNS program.

**H. Issuance Reports:**

Reports outlining the P-EBT benefits for children under age six (6) will be uploaded into NC FAST help. More information will be provided when reports are generated and posted.
I. Overpayments.

Department of Health and Human Services (DHHS) does not have authority to pursue claims against households or children that were incorrectly issued benefits to which they were not entitled. Do not include the P-EBT for children under six (6) in any overpayment calculations.

III. IMPLEMENTATION INSTRUCTIONS

This policy is effective upon receipt for all active FNS households. Submit any questions regarding this information to the DHHS Operational Support Team (OST) at DSS.Policy.Questions@dhhs.nc.gov.

Sincerely,

Carla West, Senior Director for Economic Security
Division of Social Services, Economic and Family Services

CLW/rc

Attachments (4)

- P-EBT for children under age six (6) Notice English
- P-EBT for children under age six (6) Notice Spanish
- Non-FNS P-EBT for children under six (6) Notice English
- Non-FNS P-EBT for children under six (6) Notice Spanish

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