



Arizona Department of Education
Health & Nutrition Services Division

HNS # 29-2021

MEMORANDUM

To: School Food Authorities operating the National School Lunch Program and Seamless Summer Option

From: Melissa Conner, Associate Superintendent

Date: September 17, 2021

Subject: Announcement of Pandemic-Electronic Benefit Transfer for School Year 2021-2022

Original Signed

The purpose of this memorandum is to acknowledge that the Arizona Department of Education (ADE) and the Arizona Department of Economic Security (DES) are in receipt of School Year 2021-2022 (SY 21-22) Pandemic-Electronic Benefit Transfer (P-EBT) guidance released by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) and intend to submit a State plan for the administration of SY 21-22 P-EBT for both school-aged children and children in child care facilities. ADE will issue future guidance regarding the implementation of P-EBT for SY 21-22 after the plan has been approved by USDA. The remainder of this memorandum provides initial P-EBT guidance to equip School Food Authorities (SFAs) for immediate conversations concerning SY 21-22 P-EBT eligibility.

Eligibility Criteria for Schoolchildren

The SY 21-22 P-EBT eligibility criteria for children enrolled in schools are as follows:

- i. There is a Federal Public Health Emergency designation based on SARS-CoV-2 (COVID-19) in place;
- ii. The child would have received free or reduced-price school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) if not for the COVID-19 health emergency. This includes children who are directly certified or certified by application. It also includes children enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3; and
- iii. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least five consecutive days due to the COVID-19 emergency in the current school year.

Virtual Academies

Some NSLP-participating schools have continued to require or offer full-time virtual or hybrid schedules for their enrolled students in direct response to the COVID-19 health emergency. USDA has clarified for SY 21-22 P-EBT, students who receive virtual instruction must retain enrollment in an NSLP-participating site to be eligible for P-EBT benefits.

Many NSLP-participating schools also continue to offer full-time virtual learning through district-operated Arizona Online Institutions (AOIs) or have referred students to non-district AOIs for full-time virtual learning. When a student enrolls at the AOI, the student is no longer enrolled in the brick-and-mortar NSLP-participating school. AOIs are fully virtual institutions, and do not meet the regulatory definition at 7 CFR 210.2 for a school to participate in the NSLP, which defines a “school” as “operating in a single building or complex of buildings.” Students enrolled in an AOI would not normally receive free or reduced-price NSLP meals from the AOI in the absence of the COVID-19 emergency, and therefore, do not meet the eligibility criteria to receive P-EBT for SY 21-22.

Schools that have previously qualified as a school eligible to provide NSLP meals may offer virtual instruction to their enrolled students due to COVID-19-related reasons and participate in the NSLP in SY 21-22. The school may provide the virtual instruction through school or school district staff. Students enrolled in such schools would receive free or reduced-price NSLP meals and remain eligible for P-EBT in SY 21-22.

All SFAs are encouraged to continue collecting and processing school meal applications to ensure all eligible students are identified who may qualify for P-EBT in SY 21-22. SFAs are encouraged to reference [HNS 17-2021: Collecting Student Eligibility for Free and Reduced-Price Meals in School Year 2021-2022](#) for guidance regarding the allowance of using funds from the nonprofit school food service account to collect and process school meal applications to determine P-EBT eligibility while operating under the NSLP Seamless Summer Option (SSO).

For questions concerning this guidance, contact ADE’s direct P-EBT customer service line at (602) 542-8700, option 4, or email PEBTinbox@azed.gov.

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