



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

**ROY COOPER** • Governor

**KODY H. KINSLEY** • Secretary

**YVONNE COPELAND** • Director, Division of Child and Family Well  
Being

**Date:** February 27, 2023

**Attention:** Food and Nutrition Services Managers and Supervisors

**Subject:** Pandemic Electronic Benefit Transfer (P-EBT)

**Priority:** Information and Action

**Dear County Directors of Social Services:**

**I. GENERAL INFORMATION**

Pandemic EBT (P-EBT) is a federally funded, temporary food assistance program that helps families during the COVID-19 Public Health Emergency (PHE). The United States Department of Agriculture (USDA) approved North Carolina's P-EBT State Plan for school year (SY) 2022-2023 which is similar in approach to the previously approved 2021-2022 school year plan for administering P-EBT to students in a traditional school setting and children 5 years old and younger.

The primary change this school year is the addition of fully virtual and homeschool students, who were not able to participate in P-EBT in previous years. We expect the new addition of virtual and homeschool students may cause confusion amongst families who may assume they are eligible for P-EBT when they are not. To minimize confusion, DHHS asks that all public outreach and communications about this new group come from DHHS. P-EBT will continue to be administered in partnership between the North Carolina Department of Health and Human Services (NCDHHS) and the North Carolina Department of Public Instruction (NCDPI). As in previous years, P-EBT will be administered to eligible traditional students and young children using available data.

New this year NCDHHS will coordinate with the North Carolina Department of Administration, Division of Non-Public Education, which will enable direct outreach to homeschool students. NCDHHS will take steps to identify fully virtual and homeschool students using existing data, partially prequalify these students, and contact their households with an invitation to apply for P-EBT. NCDHHS will handle all activities for the virtual and homeschool students, including prequalification, direct outreach, application processing, and communications. Counties will have no responsibilities related to this new P-EBT group of fully virtual and homeschool students, other than

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normal county FNS case processing and management, card management, and basic customer service.

North Carolina's P-EBT plan for school year 2022-2023 is approved from September 1, 2022, until the federal public health emergency (PHE) expires on May 11, 2023. The months included in the approved SY 2022-2023 plan are September 2022 (start of the school year) to May 2023 (end of the school year). This date range applies to both children in schools (traditional in-person, fully virtual, homeschool) and children 5 years and younger.

NCDHHS has received guidance from USDA that P-EBT will continue during the 2023 summer period (June 2023 – August 2023) for traditional in-person K-12 students. Key differences for Summer P-EBT is that fully virtual and homeschool students will not be eligible to receive summer P-EBT, and children 5 years and younger will not be eligible to receive Summer P-EBT per USDA guidance with the ending of the PHE.

## **II. POLICY PROCEDURES**

### **A. Traditional in-person students are eligible for P-EBT benefits during the school year if three conditions are met:**

1. The student is approved for free or reduced-price meals through the National School Lunch Program this year by May 31, 2023. This includes students who are:
  - a. Directly certified or determined “categorically eligible” for SY 2022-2023 (actively participating in Food and Nutrition Services (FNS); experiencing homelessness; migrant; or in foster care), **or**
  - b. Enrolled in a Community Eligibility Provision school where all students get free or reduced-price meals, **or**
  - c. Approved through submission of a household income-based application processed by the student’s school district for SY 2022-2023
2. The student does not receive free or reduced-price meals at the school because the school is either closed due to COVID-19 or the student is not present in school due to COVID-19 (i.e. sick with COVID-19, in quarantine, in a temporary virtual instruction setting while enrolled in a traditional school)
3. The school meets a USDA-established threshold of reduced attendance because of COVID-19 in the current school year. This is tracked by NCDPI using student attendance data and reported to NCDHHS monthly. Beginning the month that the school meets this requirement, students within that school who experience COVID-related absences can begin to receive P-EBT benefits for the eligible absences. P-EBT benefits are not issued to any student until the reduced attendance requirement is met. [Here](#) is a school search tool to check if the requirement has been met. This list is updated monthly as additional schools meet the requirement.

**B. Children 5 years and younger (Child Care P-EBT) are eligible for P-EBT if three conditions are met:**

1. The child is a member of a household that is enrolled in FNS in the benefit month (between September 2022 and May 2023). The child must remain in an active FNS case to continue to be eligible for P-EBT.
2. The child is five years old or younger as of September 1, 2023. If the child turns six years old, they can continue to receive P-EBT so long as they are not in enrolled in school.
3. During the federal PHE designation, there continues to be a decrease in meals served in child care facilities. This is tracked by NCDHHS and calculated monthly.

**C. New Category for P-EBT: Fully Virtual and Homeschool Students**

This year, the USDA released guidance requiring states to make P-EBT benefits available to students learning in fully virtual and homeschool settings if they are doing so because of a reason related to COVID-19. Certain conditions must be met for these children to be eligible for P-EBT this year:

1. The student attended an NSLP-participating school prior to leaving the traditional school setting for a fully virtual or homeschool setting after the start of the COVID-19 pandemic (on or after January 27, 2023).
2. The reason for entering the virtual or homeschool setting was due to concerns about COVID-19. Also included are young students who began their school careers in a fully virtual or homeschool institution due to concerns about COVID-19.
3. These children would be eligible for or would have received free or reduced-price meals at an NSLP-participating school if not for the pandemic putting them in a fully virtual or homeschool setting. This is assessed using the standard NSLP free or reduced-price meal eligibility criteria.

Because this group of students cannot be determined eligible based solely on pre-existing data, NCDHHS is developing a state-run application process for these students to apply for P-EBT. NCDHHS will leverage existing data to prequalify households who are most likely to have a virtual or homeschool student that meets the above criteria. These selected households will receive an invitation to apply for P-EBT, mailed and emailed by DHHS. Only those households that receive an invitation should complete a P-EBT application.

NCDHHS will share more information about this process as details are finalized.

#### D. Benefits:

P-EBT benefits for all recipients will be issued retroactively the month after benefit accrual. The first round of benefits will include all P-EBT benefits a household is eligible for dating back to September 2022. The daily P-EBT benefit rate this year is \$8.18, set by the USDA.

1. Traditional students will receive \$8.18 per eligible day of a COVID-19 related absence. Students will stop accruing benefits after the PHE ends on May 11, 2023.
2. Children 5 years and younger will receive a statewide benefit amount calculated by NCDHHS each month according to USDA approved data and rules. The benefit amount will likely change every month and the amounts will be posted to the P-EBT website.
3. Fully virtual and homeschool students found eligible will receive \$171.78 per eligible month; this is \$8.18 multiplied by 21, the average number of school days per month in North Carolina. The May 2023 benefit will be prorated for virtual / homeschool students when the PHE ends May 11, 2023.

P-EBT benefits will be electronically distributed in **one of three ways**:

1. FNS households: benefits will be deposited on their existing FNS EBT card. However, if a fully virtual / homeschool applicant is found eligible through their participation in FNS, they will receive a new P-EBT card (see option 3).
2. Non-FNS households who received P-EBT benefits within the 2021-2022 school year or summer: benefits will be deposited on their existing P-EBT card.
3. Non-FNS households who did not receive P-EBT benefits during the 2021-2022 school year or summer: benefits will be deposited to a new P-EBT card that will be mailed to the most recent address on file at the student's school. Families should confirm the address they have on file with their school is up to date. Fully virtual and homeschool students will have their P-EBT card mailed to the address on their application.

Note: The third scenario above will result in many new P-EBT cards being mailed with P-EBT benefits and counties may see an influx of undelivered cards.

P-EBT benefits will be deposited and/or mailed to the most recent known household. Benefits will not be reissued due to outdated information. However, P-EBT is meant to benefit the child and should follow the child whenever possible. If the child is part of an active FNS case and a change of circumstance is submitted that the child has changed households, then the FNS case should be updated as soon as possible to enable the benefits to be issued to the most current household. If the child is not in an FNS household and the family has a P-EBT only card, the P-EBT card should follow the child to the new household.

#### E. Notices:

Communication about P-EBT will occur through a variety of channels including press releases, social media posts, and the North Carolina P-EBT website.

Eligibility notices for P-EBT will not be mailed to households. Instead, the P-EBT eligibility notice for traditional students and young children (attached) will be posted to the P-EBT website at [www.ncdhhs.gov/PEBT](http://www.ncdhhs.gov/PEBT). Fully virtual and homeschool students who applied for P-EBT will receive an approval or denial determination notice by email. No notices will be mailed to households this year.

## **F. Reports:**

### **1. Issuance Reports**

The BIRT report **P-EBT Cases Cumulative Report 2022-23** for students (will now include both traditional students and fully virtual and homeschool students) and the **CC P-EBT Cases Cumulative Report** will be updated with the P-EBT issuances this year and uploaded into NCFAST. It is strongly recommended that counties use all available reports in NCFAST Help, as well as the toolkits provided to assist households when they call or visit the office with specific questions regarding P-EBT benefits.

**Note:** The information provided on the P-EBT reports is for county use only and cannot be released to callers or to clients who may come into the office. Counties are encouraged to provide the same level of customer service for P-EBT benefits as they do for all other benefits administered through the local DSS agencies.

### **2. Undelivered Card Report**

The **Card Status Report Undelivered County – EBTDS210-4** report is a daily report that lists all EBT cards returned as undeliverable to the EBT vendor (FIS). View here: <https://portal.ebtedge.com/govreports/ReportList.aspx>. The non-FNS P-EBT cards will also be included on this report.

If P-EBT cards are undelivered, counties are encouraged to use the available reports to assist customers when they call or visit the office with concerns regarding P-EBT benefits. This may include updating the customers address in ebtEDGE and reissuing a new card to the household if they indicate they did not receive their P-EBT card because the address on the report is incorrect or has changed.

Note: While the county is not required to work this report for P-EBT undelivered cards, the requirement to work this report for regular FNS cases is still in effect.

## **G. Overpayments**

NCDHHS does not intend to pursue claims against households or children if it was discovered that they were incorrectly issued benefits to which they were not entitled. If overpayments are determined, county staff must investigate the case to determine if the children were listed on the household's regular benefits in error. If children were listed on the case in error, only complete a claim of over-issuance for regular FNS benefits. Do **NOT** include P-EBT benefits. Do not include P-EBT in any overpayment calculations.

When NCDHHS discovers instances where a child's benefits went to the wrong household or child, NCDHHS will research those cases individually and issue benefits only when the state confirms that its original issuance was made in error.

**Do not enter P-EBT overpayments into NCFAS.**

- An error in issuance will occur only when there is a system issue that resulted in an overpayment. If an error occurs that affects a large number of households and/or benefits, NCDHHS may take action to immediately expire P-EBT overpayments that are unspent.
- If a household does not list correct or updated guardian or address information with the local school system, this does not constitute an error in issuance.
- NCDHHS will not issue duplicate P-EBT benefits in cases of disputed guardianship if the state believes the original issuance was correct.
- If an overpayment is discovered that includes both P-EBT benefits and regular FNS benefits, establish the claim only for the regular FNS benefits and do not include any P-EBT benefits.
- P-EBT overpayments will be determined by NCDHHS and tracked centrally at the state level.
- Report all county discovered P-EBT Overpayments via [dss.pi.questions@dhs.nc.gov](mailto:dss.pi.questions@dhs.nc.gov).

**H. Toolkit**

A toolkit (attached) has been developed to assist county DSS staff and partner agencies to understand the P-EBT program and in troubleshooting and answering questions. Additional information can be found on the NCDHHS P-EBT website: [www.ncdhhs.gov/PEBT](http://www.ncdhhs.gov/PEBT) (also in [Spanish](#)). The website contains [Frequently Asked Questions](#) (also in [Spanish](#)) and a [P-EBT Eligibility Quiz](#) (also in [Spanish](#)) which provides a self-guided question and answer flow to help determine eligibility. The toolkit includes the following materials:

1. P-EBT **Desk Reference** – *quick reference high-level overview of P-EBT*
2. P-EBT **Call Logics** – *resource for assisting customers and troubleshooting customer questions and concerns*
3. P-EBT **Eligibility Notice** (ENG and SPAN) – *recipients can view on the [P-EBT website](#)*
4. P-EBT **Flyer** (ENG and SPAN) – *informational flyer that can be posted or distributed*
5. P-EBT **Stock Images** (ENG and SPAN) – *images that can be used on a website or social media handles*

6. P-EBT **Website and Social Media Content** (ENG and SPAN)– *stock content can be used on websites and social media handles*

### III. IMPLEMENTATION INSTRUCTIONS

This policy is effective upon receipt for all active FNS households and all non-active FNS households matched from the Department of Public Instruction for the purposes of administering P-EBT. If you have any questions, please submit them to the Continuous Quality Improvement Team (CQI) [dss.policy.questions@dhhs.nc.gov](mailto:dss.policy.questions@dhhs.nc.gov).

Sincerely,



**Madhu Vulimiri, MPP**  
Deputy Director  
Division of Child and Family Well-Being

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**Attached (10):**  
P-EBT Desk Reference  
P-EBT Call Logics  
Eligibility Notice (ENG and SPAN)  
P-EBT Flyer (ENG and SPAN)  
P-EBT Stock Images  
P-EBT Website and Social Media Content

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