



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

**ROY COOPER** • Governor

**MANDY COHEN, MD, MPH** • Secretary

**SUSAN OSBORNE** • Assistant Secretary for County Operations for  
Human Services

**Date:** December 7, 2021

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

**Subject:** Pandemic EBT Card Issuance for School Year 2021-2022

**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 eligible school children during the school year 2021-2022. P-EBT provides benefits to households with children who would normally receive free or reduced-price meals under the Richard B. Russell National School Lunch Act, if not for school closures, COVID-19 quarantines, and remote learning. 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 students in school year 2021-2022. USDA has not yet approved P-EBT for the child care population (children under 6 years old) so this population will not be addressed in this memo.

## **II. POLICY PROCEDURES**

### **A. Eligible Children:**

The State proposes to provide P-EBT benefits for the months of September 1, 2021 through May 31, 2022 to Food and Nutrition Services (FNS) and non-FNS households with one or more children in their household who meet the following two conditions:

1. The child is eligible for free or reduced-price meals through the National School Lunch Program (NSLP) and School Breakfast Program and would be receiving

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them at school if they were not physically absent as a result of COVID-19. This includes children who are:

- a. Certified through submission of a household application processed by the child's school district for NSLP or directly certified and automatically enrolled during school year 2021-2022; **or**
- b. Enrolled in a Community Eligibility Provision (CEP) school or a school operating under Provisions 2 or 3.

**Note:** Students enrolled in full virtual academies are ineligible to participate in the NSLP and are not eligible for P-EBT.

2. The child was enrolled in a physical school but was not physically present as a result of days in quarantine or temporary virtual instruction, which prevented them from receiving meals at school. These COVID-19 related absences are defined as:
  - a. Quarantine: school tells the student to stay home because of COVID-19 related symptoms, illness, **or** exposure or parent/guardian informs the school about a student's COVID-19 related symptoms, illness, or exposure and the school approves the absence.
  - b. Temporary virtual instruction: student is enrolled in a physical school but is in virtual or remote learning for a temporary period because of a COVID-19 incident or reason.

## **B. Household Selection:**

1. To identify eligible school children and confirm their eligibility, North Carolina (NC) will utilize files from DPI that contain all students that are:
  - Eligible for free or reduced-price meals during the 2021-2022 school year by the way of NSLP application, direct certification, categorical eligibility; and
  - All children who attend Community Eligibility Provision (CEP) schools.

Students who have graduated, been determined ineligible for the NSLP, or moved out of district will be removed from this list. The list will include charter school data if the charter school participates in free and reduced priced meals. The list will not include homeschooled children or children enrolled in virtual academies.

CEP is a non-pricing meal service option for schools and school districts in low-income areas. CEP allows the nation's highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications.

2. There is no application for NC P-EBT benefits. P-EBT eligibility information for the 2021-2022 school year comes from the Department of Public Instruction based off enrollment in free and reduced-price meals at schools participating in the National Free and Reduced Lunch Program at the time of P-EBT, and the student attendance record information on COVID-19 related absences. DHHS will continue to work with DPI to identify as many eligible families as possible within the time frames established by USDA to administer the P-EBT benefits.
3. Non-FNS household does not want to participate in the P-EBT program.

Inform the household to destroy the P-EBT card and that the benefits will be available for 365 days. If they change their mind, they may call the call center to request a replacement card at any time prior to the expungement of the benefits.

**C. Benefit Levels:**

For the purposes of P-EBT, public schools, charter schools and non-public school units who administer the NSLP will be instructed to record individual student’s attendance using virtual instruction (1R) and quarantine (1D) codes. These codes will confirm a student’s eligibility for free or reduced-price meal benefits at school and the P-EBT benefit level. Student attendance records will be reported on a monthly basis and will determine student eligibility and benefit amount each month. If the student is no longer eligible or withdraws from school during the month, benefits will be based on the period of time the child was eligible for that month.

After meeting the conditions in II A. Eligible Children above, students receiving virtual instruction or who are absent due to COVID-19 conditions will be eligible for benefits for the days in which they were in virtual instruction, absent and/or quarantined (including COVID-19 related symptoms or illness).

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	<b>\$7.10</b>
Alaska	6.03	3.78	1.63	<b>11.44</b>
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	<b>8.28</b>

**Example:** Johnny John has met the requirements listed in II A. to be eligible for P-EBT. During the month of September, Johnny’s attendance was coded by the school as absent three (3) days and in virtual instruction for one (1) day due to COVID-19 conditions. Johnny would be eligible for \$28.40 (4 X \$7.10) for the month of September.

**Example:** Steven Nicks and his sister Stevie have met the requirements listed in II A. to be eligible for P-EBT. Both children attend the same grade school. During the month of September, Steven’s attendance was coded by the school as absent (7) days due to COVID-19 conditions. Johnny would be eligible for \$49.70 (7 X \$7.10) for the month of September. His sister Stevie’s attendance was coded as absent zero (0) days due to COVID-19 conditions. Stevie would not be eligible for P-EBT benefits in the month of September.

**D. Months of Assistance Tentative Issuance Schedule:**

Benefits will be issued monthly retrospectively on or about the 25th of each month following implementation through June 2022 (benefit months September 2021-May 2022).

**September 2021 through December 2021:**

The initial P-EBT multi-month issuance (September, October, November) will be staggered over three (3) issuance days during the second week of January 2022. December benefits will be issued the last week of January 2022.

**January 2022 through May 2022:**

P-EBT benefits will be issued retroactively in one-month increments in the last week of each month. Issuances will be staggered over three (3) issuance days each month.

<b>Benefit Month</b>	<b>Issuance Month</b>
September	January
October	January
November	January
December	January
January	February
February	March
March	April
April	May
May	June

**Newly Eligible Students:**

Students that become eligible for NSLP after the initial multi-month issuance will be considered eligible effective with their first month of NSLP eligibility and benefits will be issued on the next scheduled issuance.

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

**1. Children currently in an active FNS case for one of the P-EBT benefit months:**

- 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 and the number of children in the household that matched with the DPI file. The total benefits for the month are based on the number of eligible children in the household and the total number of days coded as COVID-19 related virtual instruction or absences in that month.
- That file will be submitted to NC DHHS' EBT vendor and the total benefit will be loaded onto that household's existing EBT account. Some households will receive benefits on an existing EBT card and some benefits on a new P-EBT card. The P-EBT benefits cannot be moved to the existing EBT card.

**2. Children not in an active FNS case for the given P-EBT benefit month:**

- NC DHHS will utilize the data contained in the DPI file to roll confirmed sibling sets and groups of siblings into consolidated "household" records.
- Those household records will then be batched and sent directly to our EBT vendor to create new EBT accounts.
- The calculated benefit amount for the associated benefit month will then be loaded onto the P-EBT cards via a batch file to the EBT vendor.

**3. Homeless, Migrant, and Foster Care Children:**

The Federal Programs Division of DPI will collaborate with other divisions within the department and DHHS to educate and distribute P-EBT cards for students who are experiencing homelessness, including unaccompanied homeless youth, students in foster care, and students who have been identified as migrant and other students who may need the assistance of a school social worker to help ensure access to P-EBT benefits.

The P-EBT cards for students identified as Foster children will be issued in the student's name and mailed to the local county Department of Social Services associated with the case. These cards should then be distributed to the children's caretakers.

The P-EBT cards for Migrant and Homeless students will be mailed to the address on file with DPI or in the FNS case (if one exists). The homeless liaison will collaborate with the Public School Unit's (PSU) School Nutrition Department and the local social service agency to assist with address corrections or reissuances, informational literature, and other resources distributed to

students, including unaccompanied youth, parent/guardians, school buildings, and local organizations.

#### 4. Example of the P-EBT card.



Front

Back

**Note:** P-EBT issuances for non-active FNS households will be available in ebtEDGE. This information will not be available in NC FAST.

#### F. Notices:

The notice (attached) that will be sent to all eligible students for the 2021-2022 P-EBT program. Each child will receive a notice with their first P-EBT issuance. The child will not receive a notice until they are eligible to receive a P-EBT issuance. Subsequent and denial notices will not be issued. The notice will include the following information:

- The household's phone number on file with DPI.
- How to activate the P-EBT card.
- How to pin or check the P-EBT card balance.
- Things that can or cannot be purchased with the P-EBT card.
- How the P-EBT card works.
- Households that wish to decline the benefits may simply destroy the cards.
- Expungement of unused benefits will occur at the end of 365 days.
- If they are a current FNS recipient or received P-EBT in the prior school year that the P-EBT benefits will be loaded on the same card that was received during the 2020-2021 P-EBT and that the household may continue to use the same card.
- If the household lost or destroyed their previous card, they may order a new card following the instructions provided on the notice.

#### G. Activating and Pinning P-EBT cards, Replacing Lost, Stolen or Damaged EBT Cards.

## 1. Pinning P-EBT cards:

P-EBT cards will have a mailer insert that gives the households instructions on how to activate and PIN their card upon receipt. When activating the P-EBT card the client will be asked for the Date of Birth of their youngest school age child who receives free or reduced lunch. Note: If there are multiple children in the household it may be necessary to try each school age child's date of birth to successfully activate the P-EBT card.



The screenshot shows a digital form titled "Please enter your information below." with a sub-note "\* Required Fields". The form contains three input fields: "Primary Birth Date (MMDDYYYY) \*" with the value "01012005", "New PIN \*" with four asterisks, and "Re-Enter New PIN \*" with four asterisks. There are "Save" and "Cancel" buttons at the bottom. A small eye icon is visible next to the second PIN field.

This is the screen the clients will see using the mobile app or the cardholder portal.

**Example:** The household consist of 2 school age children – one is 13 years old (DOB:04/04/2007) and one is 15 years old (DOB: 01/01/2005) and both receive Free or Reduced Lunch. The date of birth used would be the date of birth of the 13-year-old. If that does not work, the date of birth of the 15-year-old should be tried.

## 2. Replacing Lost, Stolen, or Damaged P-EBT Cards by one of the following methods:

- a. Visiting [www.ebtedge.com](http://www.ebtedge.com) if they created an account prior to losing or destroying the card.
- b. Using the EBT Edge mobile app (can be downloaded on Google Play or Apple Store) if they registered their phone prior to losing or destroying the card.
- c. Contacting the North Carolina EBT Call Center at 1-888-622-7328 to order a replacement card. Follow the instructions on how to activate and use your new P-EBT card when your new card arrives.

## H. Issuance Reports and Undelivered Card Status Report:

### NC FAST Reports:

Several P-EBT reports that may assist with troubleshooting will be housed in NC FAST Help. The P-EBT reports will contain a special password that will be provided to counties securely. The reports are as follows:

### **1. 2021 P-EBT Cases**

This detailed report shows the list of students served by month of issuance and contains student level details (name, address, school, case numbers, and benefit amounts)

**Note:** The information provided on the P-EBT reports is for county use only and cannot be released to callers or to clients who come into the office.

### **2. 2021 P-EBT Issuances**

This report shows total P-EBT cases, total P-EBT participants, and total issuance dollar amounts by county and month.

### **3. Card Status Report Undelivered County – EBTDS210-4.**

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

While counties are not required to work this report for P-EBT undelivered cards, it is strongly recommended that counties use all available reports in NC FAST Help, as well as the toolkits provided to assist customers when they call or visit the office with specific questions 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. 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. 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.

## **I. Toolkit 1.0**

A toolkit (attached) has been developed to assist county workers and partner agencies in troubleshooting and answering questions. The toolkit includes the following information:

- Simplified Student Eligibility Flowchart



- SY 20-21 and SY 21-22 Comparison Chart
- SY 21-22 Student P-EBT FAQs Toolkit 1.0
- SY 21-22 Student P-EBT One Pager
- SY 21-22 Student P-EBT Overview

## **J. Overpayments.**

Department of Health and Human Services (DHHS) recognizes that neither NC DHHS or FNS currently have authority to pursue claims against households or children that were incorrectly issued benefits to which they were not entitled.

DHHS will contact counties in regard to cases where a child's benefits went to the incorrect household. 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 benefits. Do not include any P-EBT benefits.

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

- An error in issuance will occur only when there is a system issue that resulted in an overpayment.
- Failure to list correct or to update guardian or address information with the local school system does not constitute an error in issuance.
- NC DHHS will not issue duplicate benefits in cases of disputed guardianship if the state believes the original issuance was correct.
- Do not enter P-EBT overpayments into NC FAST.
- If an overpayment is discovered that includes both P-EBT benefits and regular 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 DHHS and tracked on a central spreadsheet 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).

## **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. Submit any

questions regarding this information to the DHHS Operational Support Team (OST) at [DSS.Policy.Questions@dhhs.nc.gov](mailto: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 (6)**

P-EBT Notice English and Spanish  
Simplified Student Eligibility Flowchart  
SY 20-21 and SY 21-22 Comparison Chart  
SY 21-22 Student P-EBT FAQs Toolkit 1.0  
SY 21-22 Student P-EBT One Pager  
SY 21-22 Student P-EBT Overview