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February 4, 2021

The Honorable Tony Thurmond
State Superintendent of Public Instruction
1430 N Street, Suite 5602
Sacramento, CA 95814-5901

RE: Maximizing the Reach of Pandemic EBT and Related Federal Funding

Dear Superintendent Thurmond,

We are writing to express our deep appreciation for the success of Pandemic EBT (P-EBT) for the 2019-20 school year. During a time of tremendous hardship, your team and our state responded with an effort that helped millions of children get the nourishment they need to learn, grow, and thrive. As the harmful effects of COVID-19 continue to affect children and families across California, we are heartened by the federal extension of P-EBT through the 2020-21 school year and the federal commitment of full administrative funding for states to carry out the program.

While leadership from California's congressional delegation helped make P-EBT a possibility, we know it will take leadership from state and local administrators to make it a reality. With that in mind, we are writing with an urgent request for the California

Department of Education (CDE) to take proactive, timely steps that will help ensure all eligible children are served by P-EBT for the 2020-21 school year.

Our organizations continue to hear from communities across the state about the value of P-EBT. We also continue to hear from many families whose children, despite being eligible, were not reached by the last iteration of P-EBT or faced significant administrative hurdles in order to receive benefits. Among the barriers identified are the quality and availability of data as well as the dissemination of clear messaging. We ask that the CDE build on its past successes and address lessons learned to make the next iteration of P-EBT more effective and efficient for the millions of school- and preschool-age children whose families are struggling to make ends meet in the face of the pandemic.

While we understand that the details of P-EBT implementation will depend on the state plan that is to be approved by the US Department of Agriculture, there are foundational activities that can and should happen now to prepare for the eventuality of an approved California P-EBT plan. **No eligible child should go without P-EBT.**

Specifically, we are calling on the CDE to take immediate and sustained actions that:

1. Ensure all local educational agencies (LEAs) update and improve CALPADS records to guarantee that all students, including children in preschool and early learning programs, are accounted for with accurate birthdates, mailing addresses, and FRP-eligibility statuses. This should include, but is not limited to, providing clear guidance, direction, and ongoing support to LEAs to:
 - a. Conduct direct certification matches, on at least a monthly basis, with all available data (e.g. data related to CalFresh participation, Medi-Cal enrollment, foster status, homelessness)

- b. Communicate with parents and families about the need to complete alternate income forms or FRP meal applications for the purpose of P-EBT.
2. Allow and promote the year-round collection of alternate income forms for the purposes of P-EBT, providing clear, direct guidance to LEAs as such.
3. Provide clear guidance allowing and promoting the year-round collection of free and reduced-price meal applications as this practice is in alignment with federal guidance.¹
4. Ensure that all applicable school sites, including charter schools and special education sites, are accurately accounted for in CALPADS.
5. Ensure that state data systems accurately identify every site that operates the National School Lunch and/or School Breakfast Program as well as the students affiliated with each site.
6. Ensure that state data systems accurately identify every site that is approved to operate a universal meal provision such as the Community Eligibility Program and Provision 2.
7. Plan and prepare to quickly distribute federal administrative funds to LEAs in support of P-EBT activities, ensuring that funds will prioritize efforts, such as outreach, that target harder-to-reach populations (e.g., children experiencing homelessness, households whose preferred language is not English, immigrant households). This is particularly important given that schools are such trusted sources of information for families. Among immigrant households who

¹ USDA, Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations during School Year 2020-2021- Q&As #4 <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-CACFP04-SFSP04s.pdf>

have concerns related to public charge and use (or future use) of their personal details, schools can be one of the only trusted sources of information.

8. Plan and prepare to provide recourse and client support for families who can verify their child's eligibility for P-EBT but do not receive P-EBT benefits for their child.
9. Work with the state administration to provide clear, direct messaging about P-EBT, eligibility for immigrant children and children in immigrant families, and concerns about public charge.

As we are all witnessing each and every day, the COVID-19 crisis continues to increase hardship throughout California. Families are struggling to access the food they need. A recent statewide survey² shows that nearly 75 percent of parents have worried about running out of food in the past 12 months -- and even more alarming, more than three in five actually ran out of food before they had money to buy more.

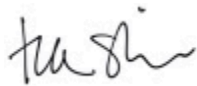
Past inequities in food access also persist during the current crisis with Black and Latinx households being at greater risk for food hardship. The same statewide survey shows that in the past 12 months, one-third of all respondents have run out of food before they had money to buy more. The same is true for an estimated two-thirds of Black and Latinx respondents.

Nutritious food is a right and an educational tool. We must meet children's basic needs, including nutrition, in order to close the gaps in educational opportunity and academic achievement that harm California's low-income students and students of color, particularly Black and Latinx children.

² Maslin, Maullin, Metz & Associates (FM3) and Nourish California, The Lives of Californians in 2020, <https://nourishca.org/nourishca-fm3-fullslidedeck-2021/>

Thank you for your consideration. We look forward to your response and the CDE's timely efforts to connect children with much-needed P-EBT benefits. We stand ready to support the momentous planning and implementation required to do so.

With appreciation,



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