

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
Document ID:	
Z-RIN:	
Date of Issuance:	January 29, 2021
Replaces:	N/A
Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 of the Families First Coronavirus Response Act (P.L. 116-127) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Additional context and background for this document can be found at: <https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>

The P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021

1. State: Wisconsin

2. Primary Citations: Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021

3. Executive Summary:

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- a. The *date range* covered by this State plan or amendment
 - for children in school
 - for children in child care
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care
- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
 - School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Response:

This State plan will cover the date range of October 1st, 2020 through September 30th, 2021. The estimated monthly and total P-EBT issuance are listed below as well as the estimated total number of children to which

¹ The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

² Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

the State will issue childcare P-EBT benefits. Specifically, the estimated number of non-school children in childcare is based on the actual number of children in households in Wisconsin as of 3/12/2021 who: (1) were under age 6 as of 10/1/2020, (2) who are part of a household which has received SNAP benefits at some point since 10/1/2020, and (3) who are not already considered eligible for the school P-EBT program. By the time of issuance, this number (and associated issuance estimations) may vary as additional households with young children may either start or stop receiving SNAP benefits as well as the fact that we have not yet determined if any of these non-school children in childcare will have already been determined eligible for and issued benefits through our school P-EBT program. These values also represent the hypothesized scenario in which eligible children in our five statewide regions are relatively evenly split between being eligible to receive the maximum monthly benefit amount (5 virtual days/week or 100% of the time), being eligible to receive a hybrid monthly benefit amount (3 virtual days/week or 60% of the time), and not being eligible to receive any monthly benefit amount (0 virtual days/week or 0% of the time).

- Estimated monthly issuance to non-school children in childcare:
\$ 7,494,252³
- Estimated total issuance to non-school children in childcare:
\$ 68,572,410⁴
- Estimated number of non-school children in childcare to which the State will issue P-EBT benefits:
91,572⁵

The estimated total amount of administrative funds the State needs to complete the work described in this plan is approximately \$3,200,000. Finally, our tentative P-EBT issuance schedule for eligible recipients, subject to slight variances based on process implementation variables and other systems interactions, is as follows:

- Issuance in May 2021
 - o May 29th, 2021: Issuance to non-school children in childcare to cover October, November, and December benefits
- Issuance in June 2021
 - o June 19th, 2021: Issuance to non-school children in childcare to cover January, February, and March benefits
- Issuance in July 2021
 - o July 24th, 2021: Issuance to non-school children in childcare to cover April, May, and June benefits
- Issuance in September 2021
 - o September 29th, 2021: Issuance to non-school children in childcare to cover September benefits

³ Month with maximum # of school days: 20 days. As we are assuming a relatively even split between students learning 5 virtual days/week, 3 virtual days/week, and 0 virtual days/week, we will use the average of 3 virtual days/week to determine these cost estimates (as it most closely represents the middle ground). In line with our benefit level for school students learning 3 virtual days/week, this amounts to 60% of the maximum monthly benefit amount. [(20 school days x \$6.82 x (Estimated # of children)) x 0.60]

⁴ Covers October 2020 benefits through September 2021 benefits.

⁵ The number of children in SNAP households as of 2/10/2021 who were under age 6 as of 10/1/2020.

We are intentionally staggering our school P-EBT and childcare P-EBT issuances so as to avoid benefits for both programs being spent in the same timeframe, to avoid overwhelming our support staff in addressing customer service questions, and to avoid unnecessary confusion for families with some children receiving school P-EBT benefits and other children receiving childcare P-EBT benefits.

Further, as our childcare P-EBT benefit calculation method is centered entirely around the school learning model surveys and results we receive as part of our school P-EBT program, we are not currently prepared to offer childcare P-EBT benefits for months during which schools are not in session (primarily, July and August 2021). That said, Wisconsin is awaiting further guidance from FNS regarding how to feasibly extend this program and its benefits into months beyond the 2020-2021 school year. When we receive this guidance, we will make any necessary additions to this plan so as to continue to implement childcare P-EBT into the summer of 2021.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

1. The child is a member of a household that received SNAP benefits at any time since October 1, 2020.
2. The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)
3. During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?
- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility?
Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?
- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?
- Describe the process that the State will use to update and re-establish each child's continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)
- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).
- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

To confirm the first criteria of eligibility, the State will compile a list from our CARES eligibility system of all children under the age of 6 as of **October 1, 2020** who belonged to active SNAP households during any/all of the months within our first issuance period (October, November, and December 2020). Because we are using our State-managed active eligibility system, we feel confident that we will have access to the best available data regarding children who are part of households currently receiving SNAP benefits to be included. This eligibility check will be repeated prior to each round of issuance to determine which non-school children in childcare who meet the age requirement were part of active SNAP households during the months in question. Additionally, prior to each round of issuance, the list of eligible non-school children in childcare settings will be cross-checked against our list of children eligible for school P-EBT benefits. As our school P-EBT benefit calculation process is more closely tied to each individual student's learning experience (as compared to the childcare PEBT benefit calculation method), we will leave any duplicate students on our school P-EBT list of eligible children and remove them from our list of potential childcare P-EBT recipients.

Further, we will consider a child to be part of an “active” SNAP household in a given month if their household was enrolled in SNAP and receiving SNAP benefits for that month. We will only be providing childcare P-EBT benefits to children for months in which their household was enrolled in SNAP (as documented and kept up-to-date within our CARES eligibility system). If, at any point in the period from 10/1/2020 through 9/30/2021, a household’s SNAP enrollment ends, any child(ren) previously eligible for childcare P-EBT benefits will no longer be considered eligible. Specifically, for our September 2021 prospective issuance of childcare P-EBT benefits, we will consider a child to meet this “active” SNAP eligibility criteria if their household is enrolled in SNAP as of September 1st, 2021. Further, this check of whether children are part of an “active” SNAP household will be performed no less frequently than once per month, in accordance with our proposed May, June, July issuance timeline.

As allowed by the USDA, we will employ the simplifying assumption that all children under the age of 6 are enrolled in a covered child care facility. This will satisfy the second criteria of eligibility.

To confirm the third criteria of eligibility, the State will focus on determining whether one or more schools in the area of the child’s residence was closed or operating with reduced attendance or hours at any point on or before October 1st, 2020. As a first step, the State is proposing employing a simplifying assumption around how to define the word “area”. Specifically, we will use each child’s *county* of residence to help determine whether he or she has met this third criteria of eligibility. To continue, as part of our approved P-EBT plan for school children, the State already disseminated a survey to all known NSLP schools across the state soliciting information about their learning models by grade and by month. This survey also asked schools to report when they first became eligible for P-EBT by satisfying the ‘5 consecutive school day’ threshold previously outlined by the USDA. The State will review the results of our P-EBT school survey and aim to identify at least one school within each county which satisfied the ‘5 consecutive school day’ eligibility criteria on or before October 1, 2020. If achieved, we could then assume that all children who live in the state of Wisconsin (made up entirely of 72 counties) and who satisfy the first two P-EBT eligibility criteria will also satisfy the third and final eligibility criteria. On the other hand, for any children who reside in a county that does not have at least one school which has met the ‘5 consecutive school day’ eligibility criteria, these children will not be considered eligible for childcare P-EBT benefits (until such point as a school within their county does meet that 5 consecutive school day threshold).

Given all of these children are part of households currently receiving SNAP benefits, there are no anticipated barriers in contacting/communicating with these families as needed as well as issuing their benefits directly onto active QUEST (EBT) cards used for SNAP. This is similar to how the State intends to issue benefits to P-EBT-eligible school children who are part of SNAP households. Further, relying only on existing SNAP cases in the CARES system allows us to confirm that each student is, in fact, part of a household with a valid Wisconsin address (and, therefore, lives within **1 of the 72 Wisconsin counties** as referenced above).

There will be several partners involved in the successful implementation of childcare P-EBT in the 2020-2021 school year. The high-level roles and responsibilities of each are outlined below. **The State is convening regularly with each of these stakeholders to ensure all required tasks are feasible and developed cooperatively.**

1. Department of Health Services (DHS)
 - a. Overall program oversight.
 - b. Hiring and supervision of new staff team dedicated to the P-EBT communication plan design and development, verification of eligibility, and problem resolution process.
 - c. Monitoring of card issuances and deliveries.
 - d. Review of school survey results to determine that at least 1 school in each Area Administration Region is closed or operating at reduced attendance or hours at each survey response interval.

2. Department of Public Instruction (DPI)
 - a. Disseminate learning model surveys to schools at specified intervals and share school survey results with other partner agencies by agreed-upon deadlines.
3. Deloitte
 - a. Pull list of eligible students from CARES system at specified intervals.
 - b. Execute mailings and other communications upon request from DHS.
 - c. Send benefit issuance files to FIS for completion/execution.
4. FIS
 - a. Process benefit issuance files once received from Deloitte and issue P-EBT cards.
 - b. Update and include message inserts mailed before and then with P-EBT cards.
5. Statewide Network of Partners
 - a. Communicate P-EBT information to eligible families.

6. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

Notes:

1. Lunch rates include the 7 cent performance-based reimbursement and the extra 2 cents per meal received by school food authorities in which 60 percent or more of the lunches served during the second preceding school year were served free or at a reduced price.
 2. Breakfast rates are those received by "severe need" schools.
 3. Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2020-07-22/pdf/2020-15764.pdf>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

In Wisconsin, there are 5 existing Area Administration Regions⁶ through which the Department of Health Services oversees and helps to facilitate health and human service programs statewide. These regions are made up of and divided along county lines (the Region with the fewest counties comprises 8 counties, and the Region with the greatest number of counties comprises 18 counties). As with the third criteria for childcare P-EBT eligibility, the State will again be relying on results from our school learning model surveys to determine a singular benefit level for non-school children in childcare within each of the 5 Area Administration Regions for each month of the 2020-2021 school year. As part of these school learning model surveys (and as described in-depth within our previous P-EBT approved plan), eligible schools across Wisconsin are selecting the most representative learning model for each grade within their school and for each month. Immediately after the agreed-upon deadline, the results of the survey will be shared with DHS and our partners at Deloitte in the form of one, large dataset. For the purposes of determining childcare P-EBT benefit levels, we will sort this dataset into results from schools in each of the 5 Area Administration Regions. Once this sorting is done, Deloitte will be able to determine the most common learning model (options include: All In-Person, In-Person with Option for Virtual, Virtual 1 day/week, Virtual 2 days/week, Virtual 3 days/week, Virtual 4 days/week, and All Virtual) for each month. This most common learning model will then be utilized as a starting point in determining one childcare P-EBT benefit amount for all eligible children within each of the 5 Regions for each month covered by the survey. We will be using a

⁶ <https://www.dhs.wisconsin.gov/areaadmin/index.htm>

similar benefit calculation method employed within our school P-EBT plan (multiplying the average statewide number of school days for that month by \$6.82 and adjusting this by a certain percentage). Specifically, if the most common learning model for schools in a region is “All In-Person”, non-school children in childcare will receive 0% of the maximum P-EBT benefit amount for that month. If the most common learning model for schools in a region is “All Virtual”, non-school children in childcare will receive 100% of the maximum P-EBT benefit amount for that month. Finally, as a necessary simplifying assumption, if the most common learning model for schools in a region is either “In-Person with Option for Virtual” or any of the remaining hybrid learning model options (Virtual 1 day/week, Virtual 2 days/week, Virtual 3 days/week, or Virtual 4 days/week), non-school children in childcare will receive 60% of the maximum P-EBT benefit amount for that month (the benefit level that typically corresponds to Virtual 3 days/week). The table below also lays out these benefit levels.

Most Common Learning Model for Schools in a Region	Percentage of Maximum P-EBT Benefit Amount for that Month (%)
All In-Person	0
In-Person with Option for Virtual	60
Hybrid – 1 Virtual Day/Week	60
Hybrid – 2 Virtual Days/Week	60
Hybrid – 3 Virtual Days/Week	60
Hybrid – 4 Virtual Days/Week	60
All Virtual	100

Of note, we have intentionally opted to rely on each Area Administration Region’s ‘most common’ learning model (and, therefore, benefit amount) rather than the average benefit amount per month. Doing so will allow all childcare P-EBT benefit issuance amounts to align with one of our aforementioned learning model options (rather than an amount in between two benefit levels – as would likely result from taking each Area Administration Region’s average). This will also aid in our communications to eligible families around how benefits were calculated and how they compare to school P-EBT benefit levels.

Unlike our school P-EBT plan, we will not be offering an opportunity for non-school children in childcare to seek an adjusted benefit amount if they feel the issued amount does not reflect their actual learning experience. As childcare P-EBT is not actually tied to a child’s attendance at a covered childcare facility or to the overall learning practices within childcare facilities statewide, the State will not have a way to verify each individual child’s learning experience. The State will put forth various communications materials and public information campaigns to explain how benefit amounts were calculated and to clarify where a family can go for additional questions or program information.

As with our approved school P-EBT plan, in order to continue to provide P-EBT benefits to eligible non-school children in childcare up until the September 30th, 2021 funding deadline, we will be employing a unique and more prospective issuance model for only the month of September 2021 (the start of the 2021-2022 school year). In order to obtain the anticipated September 2021 learning model of schools in each Area Administration Region in as timely and accurate of a way as possible, we will likely request that eligible schools submit this information as part of our final learning model survey of the 2020-2021 school year (likely in June 2021). Although this learning model may subsequently change throughout September 2021, having schools provide current learning model on the first day of instruction will allow enough time to process and issue P-EBT benefits before the September 30th, 2021 funding deadline. As with our school P-EBT benefit calculation plan and assumptions, we will assume that September 2021 will include the same number of school days as our statewide tabulation for September 2020 (16 school days). Further, at the time of the submission of this plan, we do not have access to 2021-2022 meal reimbursement rates, so we will continue to use the 2020-2021 \$6.82 figure for the purposes of budgetary planning. Overall, to calculate childcare P-EBT benefits for September 2021, we will follow the same method as with earlier months

(basing the benefit on the most common learning model prospectively selected by schools in each Area Administration Region).

Overall, we propose dividing the State into these 5 Area Administration Regions for benefit calculation due to the existing data challenges we face as well as a desire to expedite the process of disseminating benefits to non-school children in childcare settings as much as possible. Based on initial difficulties in achieving responses to our learning model survey from all schools, we believe that dividing the State into areas too small could result in some areas not having any or enough schools who submitted their learning model information. This would leave non-school children in childcare settings in those areas either without any P-EBT benefits or with an averaged benefit that is based on a small, potentially unrepresentative sample size. Additionally, as our school P-EBT benefit issuance did not begin until late March due to necessary backend systematic changes, we aim to avoid any unnecessary delays in our childcare P-EBT issuance schedule. Similarly, by waiting until late May to begin childcare P-EBT issuance, this allows for sufficient time to receive any late, missing, or corrected school learning model information submissions, allowing the State to be leveraging the absolute best school data available to us. By relying on the State's 5 Area Administration Regions rather than more zoomed-in areas, the process of calculating benefits becomes increasingly simplified.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).
- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?
- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.
- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.
- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.
- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?
- Will you issue *new* P-EBT cards to existing P-EBT households?
 - If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Response: [please use as much space as needed]

High-Level Tasks to Complete Post-Approval:

- Communications sent to school administrators, families, and shared with the public through existing online platforms and outreach partner support
- New staff hired to support problem resolution processes and continued communications
- Schools return completed first round learning model surveys, data sorting and Region-based benefit determination process begins
- Systems updates are completed to support administrative functions for the program (streamlining case review and resolution process)
- Benefits are issued via FIS

- Process is repeated for second, and third round of P-EBT issuances (communications, survey completion, data sorting/benefit determination, benefit issuance)

As all non-school children in childcare are part of active SNAP households, benefit issuance can be simplified and expedited. We will load all P-EBT benefits directly onto the family's existing SNAP QUEST card (including any post-issuance adjustments to benefits as applicable). There will be no new P-EBT cards needed to support childcare P-EBT at this time **and, therefore, no need for additional demographic or address information to be compiled**. As with our school P-EBT plan, we are using a sub-benefit type in order to differentiate SNAP and P-EBT benefits for reporting purposes. P-EBT benefits – both school P-EBT and childcare P-EBT – will be designated the highest spend priority, similar to the way the State operated last year. All P-EBT benefits will follow the same expungement schedule as SNAP benefits, meaning they will age the same way in the State's eligibility system and in the State's EBT Processor's (FIS) system. Benefits will be expunged after 365 days.

Further, we will handle returned mail in the same process as approved in our school P-EBT plan. Specifically, the return mail process will be managed by the newly hired problem resolution team. The State currently receives a daily undelivered mail report. It is our understanding that our EBT processor (FIS) will be able to identify which pieces of returned mail were P-EBT cards so that the problem resolution team can proactively reissue cards. If FIS is unable to make the required system changes in time, the process will resemble the 2019-2020 process in which a dedicated team responds to incoming emails and phone calls by researching why cards were not received and reissuing when appropriate. Additionally, the PEBT problem resolution will spot check batches of cards that were mailed to make sure cards were delivered and activated. If cards are found undelivered, the problem resolution staff will contact families and resolve address issues.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

1. USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.
- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.
- Describe the State's public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).
- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How dispose of the card, etc.
- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - a. What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - i. A description of P-EBT
 - ii. Instructions for PINing a P-EBT card
 - iii. Explanation of where benefits can be used
 - iv. Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - v. Explanation of violations and penalties, such as trafficking
 - vi. An indication that benefits are non-transferable
 - vii. Instructions for destroying the card, if they want to decline benefits
 - viii. Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)
 - b. How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - i. Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - ii. Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

All components of our Customer Service plan mirror what the State has committed to within our already approved school P-EBT plan. Specifically, DHS has created a specific unit to support case management and problem resolution for all P-EBT operations. This group will be supporting customer service including oversight of a hotline and dedicated email box, provision of fair hearing information, and other day-to-day management of P-EBT operations post-roll-out. The hotline can be reached at 833-431-2224, and the dedicated email box can be reached at PEBTsupport@wisconsin.gov.

The problem resolution team employs multiple bilingual staff members and also utilizes the same translation services used by DHS's SNAP team, which will help address challenges encountered by families with limited English proficiency.

Foster children are known to the State's eligibility system, so they will be treated in the same manner as SNAP households. Homeless children are known to the State's eligibility system. As such, these children already have case numbers which include mail addresses, which can include county agencies or shelters. Since these children are already known to our system, benefits will be loaded systematically onto existing SNAP cards.

Social Security Numbers (SSNs) are not required as part of P-EBT eligibility. While SSNs will help DHS identify and match a child to a SNAP case more efficiently, the problem resolution team will be empowered to research individual cases should a match not be identified. There will be no impacts to those students who either do not have a SSN or whose parents choose not to provide one.

The problem resolution team will have staff responsible for answering a hotline. Parents of children without internet access can call the hotline with questions. Internet access is not an eligibility factor for P-EBT, and, as such, we will make every effort to provide the same level of service to those without internet access.

In addition to hiring operational staff, DHS hired communications specialists who will be responsible for supporting the public information campaign for this initiative. This will include regular updates to both the DHS website and social media and the development and dissemination of other print and non-print materials, including letters, brochures, and other informational bulletins.

DHS will send mailers to all eligible SNAP households with P-EBT program details, including but not limited to: benefit issuance dates, benefit amounts, an explanation of what P-EBT benefits are and how they qualified, and information about the problem resolution process (through the hotline phone number and email address). Information contained on each communication is listed below:

The mailing sent to each P-EBT household will contain:

- A description of P-EBT and how benefits are determined
- An explanation of where benefits can be used, what benefits can be spent on, and a hyperlink to a DHS website that explains such details, including an explanation of violations and penalties
- Details regarding how to contact the PEBT support hotline/email address
- Other details as necessary

9. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Response: [please use as much space as needed]

All components of our Over-Issuance plan mirror what the State has committed to within our already approved school P-EBT plan. Specifically, we will not reduce SNAP payments to compensate for P-EBT over-issuance. Throughout the initial data gathering process, we are confident in our ability to correctly issue benefits and to reduce the number of over-issuance cases to as few as possible. By using the same back-end verification procedures as the 2019-2020 iteration, we will systematically prevent duplicate issuances for P-EBT. In the 2019-2020 school year, by using this process, we eliminated all but a few cases of over-issuance. Additionally, we will be running a cross-check (as described) against school P-EBT children prior to each issuance to prevent any duplicate issuances across school P-EBT and childcare P-EBT. Overall, the State is issuing benefits based on the "best available information". Should cases of over-issuance come to our attention and/or if the State becomes aware of changes in this information, we will investigate the matter and adjust our processes accordingly.

10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

13. Civil Rights Statement

The State will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

14. Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. If the State wishes to change any of the terms of its plan, the State shall first notify USDA and will, if requested by USDA, submit a plan amendment for USDA review and approval.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:

Signature
Print Name and Title

Signature
Print Name and Title

Date of Request: _____