

State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

1. State: *Wyoming*

- 2. Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021;
American Rescue Plan Act of 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).

- a. The *date range* covered by this State plan or amendment
 - 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 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. 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:

- a) *Date Range: September 1, 2021 - May 31, 2022*
- b) *Estimated Amount: Wyoming estimated issuing the following amounts for children in child care:*
 - i) *5,000 children in fall: 5,000 * \$119.85 (see table below) = \$599,240.00*
 - ii) *5,000 children in spring: 5,000 * \$139.16 (see table below) = \$695,800.00*
 - iii) *TOTAL = \$599,240.00 + \$695,800.00 = \$1,295,040.00.*
- c) *Estimated total number of children: Wyoming estimates issuing P-EBT benefits to approximately 5,000 non-school children under age 6 who were enrolled in SNAP on/after September 1, 2021.*
- d) *Tentative P-EBT issuance schedule: Wyoming anticipates being able to issue benefits to children in Child Care within 60 days after benefits for school-aged children have been issued. Wyoming anticipates being able to issue benefits to children in Child Care*

¹ The date range covered by P-EBT State plan or amendment. A State's plan will typically cover the instructional months in the State's school year (September 2021 through June 2022, for example).

by the end of February 2023.

4. P-EBT for School Children (see Q&As #6-24)

See [Wyoming's approved P-EBT 2020 - 2021 School Year Plan.](#)

5. P-EBT for Children in Child Care (see Q&As #25-33)

Standard for P-EBT Eligibility

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

The child is a member of a household that is enrolled in SNAP in the benefit month.

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.)

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? (See Q&A #29)
- 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 how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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.

Responsible state agencies

The following agencies are responsible for the development of this plan and will share responsibility for administration of the plan:

- *The Wyoming Department of Family Services (DFS) in partnership with Wyoming Department of Education (WDE) is responsible for writing and administering P-EBT for child care children.*

Identifying SNAP Enrolled Children

- The state will identify children who began school year 2021-2022 under the age of 6 and were part of a household that receives SNAP.
- Consistent with P-EBT’s authorizing statute, all children under the age of 6 are deemed enrolled in a covered childcare facility.
- The state will make the reasonable simplifying assumption that children who began receiving benefits as a 5-year-old earlier in school year 2021-2022 remain enrolled in a covered child care facility through the end of the school year as long as the household continues to receive SNAP.
- The state understands that a child’s eligibility for P-EBT child care benefits ends when a child’s SNAP enrollment ends.
- The state will ensure that children who receive P-EBT benefits under the state’s approved plan for school children will not also receive P-EBT child care benefits.

Establishing a Reduction in Access to Child Care Using the CACFP Data Method

- CACFP lunch claims confirm that there has been a statewide reduction in access to child care for each of the months of the current school year through *May 2022* relative to the same months immediately prior to the pandemic.
 - For purposes of this plan, the state will use the sum of CACFP lunch claims for child care centers and family day care homes as reported by the state on the FNS-44. The state will exclude at-risk lunches and adult lunches. See Table 1 below for the state’s lunch claims for the fall semester.
- The state will monitor CACFP lunch claims through the end of the school year and will only issue benefits for months where lunch claims (to the extent that preliminary data are available) remain below claims for the most recent same month prior to the pandemic.

6. Setting Benefit Levels Using the CACFP Data Method

- The state will set an average monthly P-EBT child care benefit for the fall semester and a separate average monthly benefit for the spring semester. The averages are calculated using **the following three factors**:

Fall semester benefit:

1. The reduction in aggregate lunch claims over the fall semester relative to the same months from the fall of 2019. See Table 1.
2. The average number of school instructional days over the course of the current school year. This is equal to the number of instructional days in the year divided by the number of school months: $[180] \div [9 \text{ months}] = [20]$ days per month. *[If applicable: This is consistent with the number of days used in calculating a P-EBT for students with fully virtual schedules in our approved P-EBT school plan.]*
3. The school year 2021-2022 P-EBT benefit per day of \$7.10.

Spring semester benefit:

1. The spring semester benefit will be calculated as above, but will use the aggregate reduction in lunch claims over the available months of the spring semester relative to the same months immediately prior to the pandemic to calculate the first factor. See Table 2. Based on the state’s anticipated distribution of spring semester P-EBT child care benefits in **December 2022**, the state will only have access to spring 2022 CACFP claims data through **May 2022** and will use the reduction in claims through that month to calculate the first factor.
2. Before calculating its monthly spring P-EBT benefit, the state commit to sharing its data and calculations with USDA. The state will also confirm that CACFP claims for all available months of the spring semester remain below CCACFP claims for the same months immediately prior to the pandemic before issuing benefits for any of those months.

Table 1: Reduction in CACFP lunch claims – fall semester

CACFP lunch claims pre-pandemic months		CACFP lunch claims current school year months		Percent Change, Fall Semester: To be applied to daily rate and number of school instructional days per month.
September 2019	91,443	September 2021	71,555	
October 2019	105,502	October 2021	74,281	
November 2019	84,297	November 2021	71,812	
December 2019	82,117	December 2021	69,216	
Total	363,359	Total	286,864	-21.1%

Table 2: Reduction in CACFP lunch claims – spring semester

The numbers below for the CACFP lunch claims for the spring semester may change between the date of this State Plan and the end of the school year which is 12/31/2022. There are late claims and review adjustments that may affect the numbers. Final numbers will be available in January 2023 when WDE submits their closeout reports. Wyoming commits to sharing the

January 2020	95,642	January 2022	69,847	
February 2020	87,672	February 2022	74,129	
March 2019	94,583	March 2022	86,660	
April 2019	108,326	April 2022	81,364	
May 2019	105,501	May 2022	83,530	
Total	491,724	Total	395,530	

Average monthly P-EBT child care benefit, fall and spring semesters:

Child Care Calculation	Percent Change in CACFP Lunch Claims	Average # of Virtual Days per Month in Schools Plan	Number of Months in Semester	Daily Benefit Amount	Average Monthly Benefit	Full Semester Benefit
Fall Semester	-21.1	20	4	\$7.10	\$29.96	\$119.85
Spring Semester	-19.6	20	5	\$7.10	\$27.83	\$139.16

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 2020-2021, 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 2020-2021. 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 2020-2021, 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]

- a) *Cooperation: Wyoming has worked closely with its EBT vendor, FIS, along with its data vendor, Crocus, and WDE to develop the proposed implementation schedule. Benefits for children in child care will receive their benefits on existing SNAP cards. Wyoming does not anticipate the need to issue new P-EBT cards for this group of children.*
- b) *Tentative timeline:*
 - i) *FNS Plan Approval: Day #0*
 - ii) *DFS/Crocus to analyze data from SNAP eligibility files for benefit assignment: Day #35-50*
 - iii) *DFS/Crocus to ensure there is no duplication of benefits across child care files and school-aged benefits issued: Day #72-89*
 - iv) *DFS prepares final data files for FIS: Day #90*
 - v) *Benefits loaded to existing SNAP cards: Day #91*
- c) *Unique P-EBT cards: Benefits will be issued for Child Care children to their existing SNAP cards.*
- d) *Distinguish P-EBT from SNAP or D-SNAP: Wyoming's regular SNAP benefits are issued with a type of "FS" with no subtype. For P-EBT and D-SNAP, a unique subtype is added. P-EBT's subtype code is "SL" and D-SNAP is "ND".*
- e) *Draw downs: Wyoming's draw/spend authority is P-EBT, D-SNAP, then SNAP.*
- f) *Expungements: Wyoming will follow the same expungement rules that are currently followed for SNAP with the exemption of sending notices. Families will be notified of*

the expungement rules in the information provided with the card mailer. The current expungement is 274 days due to the Farm Bill requirements.

- g) Incorrect addresses: Benefits will be issued for Child Care children to their existing SNAP cards.*
- h) New P-EBT Cards: Benefits will be issued for Child Care children to their existing SNAP cards.*

8. Customer Service

For a full description of Wyoming's plan to address Customer Service, please refer to page 12 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

9. Over-issuance of P-EBT benefits

For a full description of Wyoming's plan to address Over-issuance of P-EBT benefits, please refer to page 15 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

10. Benefit Issuance Reporting

For a full description of Wyoming's plan to address Benefit Issuance Reporting, please refer to page 16 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

11. Administrative Funding

For a full description of Wyoming's plan to address Administrative Funding, please refer to page 16 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

12. Release of Information

For a full description of Wyoming's plan to address Release of Information, please refer to page 17 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

13. Civil Rights Statement

For a full description of Wyoming's plan to address Civil Rights Statement, please refer to page 17 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).

14. Administration of State P-EBT Plan

For a full description of Wyoming's plan to address Administration of State P-EBT Plan, please refer to page 17 of [Wyoming's approved P-EBT 2020 - 2021 School Year Plan](#).