

**State Plan for Pandemic EBT
Children in School, 2021-2022**

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Title of Document:	State Plan for Pandemic EBT: Children in School, 2021-2022
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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools during school year (SY) 2021-2022. (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), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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 is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

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

1. **State:** Wisconsin

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 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. 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:

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).

This State plan will cover the date range of August 1st, 2021 through June 30th, 2022² and will apply to the School P-EBT program. The estimated monthly and total School P-EBT issuance are listed below as well as the estimated total number of children to which the State will issue School P-EBT benefits. These values represent the hypothesized scenario in which eligible students are evenly split between receiving a benefit amount of \$142.00 (corresponding to virtual learning or absence for a COVID-related reason for 20 days each month), a benefit amount of \$71.00 (corresponding to virtual learning or absence for a COVID-related reason for 10 days each month), and a benefit amount of \$0.00 (corresponding to virtual learning or absence for a COVID-related reason for 0 days each month). These estimates are also based on the scenario in which all eligible schools meet the 5-day threshold as of the start of September, allowing eligible students and children to receive benefits in September corresponding to a full month. Because a relatively small proportion of students began the 2020-2021 school year before September and, as such, few schools in the state will have met the 5-day threshold prior to the start of September, we are not including August 2021 benefits in these estimates. To continue, these estimations do not account for students who will pursue adjusted benefit rates. It is unknown at this time how many students eligible for School P-EBT will seek such adjustments through our provided channels. These estimations also represent the unlikely scenario in which all eligible students receive the same amount in benefits during each month of the 2021-2022 school year. Finally, the following estimated monthly and total issuance amounts for school children in SNAP and in non-SNAP households are based on the number of school children in each population who received School P-EBT benefits in December of 2020 – a month in which benefit issuance peaked for the 2020-2021 year. For these reasons, the following numbers are likely over-estimations, as it is expected that a larger portion of students may have returned to fully in-person learning at the start of the school year, with that portion increasing over time. That said, the State commits to informing USDA of any significant increase or decrease in these data points during the date range covered by this initial plan (or subsequent amendment).

- Estimated **monthly amount** of P-EBT benefits the State will issue within this plan/amendment’s date range.
 - o Estimated amount issued to school children in SNAP households. **\$13,277,000³**
 - o Estimated amount issued to school children in non-SNAP households **\$5,786,500⁴**
- Estimated **total amount** of P-EBT benefits the State will issue within this plan/amendment’s date range.
 - o Estimated amount issued to school children in SNAP households. **\$132,770,000⁶**

² This plan does not include July and August of 2022 because the State’s forthcoming Summer P-EBT plan for 2022 will cover the months of July and August 2022.

³ Number of months in the 2021-2022 school year (not including August 2021): 10. As we are assuming an even split between students receiving \$142, students receiving \$71, and students receiving \$0, the \$71 benefit amount is being used as an average indetermining these cost estimates. (10 school days x \$7.10 x # of SNAP students in December 2020).

⁴ (10 school days x \$7.10 x # of non-SNAP students in December 2020)

⁵ (10 school days x \$7.10 x # of non-school children in childcare in 2020-2021)

⁶ [(10 school days x \$7.10 x # of SNAP students in December 2020) x 10]

- Estimated amount issued to school children in non-SNAP households \$57,865,000⁷
- Estimated total **number** of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households 187,000⁹
 - Estimated number of school children in non-SNAP households 81,500¹⁰

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 March 2022
 - March 5th, 2022: Issuance of School P-EBT to school children in SNAP and non-SNAP households to cover September and October benefits
- Issuance in April 2022
 - April 9th, 2022: Issuance of School P-EBT to school children in SNAP and non-SNAP households to cover November and December benefits
- Issuance in May 2022
 - May 14th, 2022: Issuance of School P-EBT to school children in SNAP and non-SNAP households to cover January and February benefits
- Issuance in June 2022
 - June 18th, 2022: Issuance of School P-EBT to school children in SNAP and non-SNAP households to cover March and April benefits

⁷ [(10 school days x \$7.10 x # of non-SNAP students in December 2020) x 10]

⁸ [(10 school days x \$7.10 x # of non-school children in children in 2020-2021) x 10]

⁹ Estimated number of students from SNAP households who received School P-EBT benefits for the month of December 2020. That month represented a peak in School P-EBT issuances in the 2020-2021 School Year and is, therefore, being utilized to provide conservative (and likely over-) estimates for the 2021-2022 School Year.

¹⁰ Estimated number of students from non-SNAP households who received School P-EBT benefits for the month of December 2020. That month represented a peak in School P-EBT issuances in the 2020-2021 School Year and is, therefore, being utilized to provide conservative (and likely over-) estimates for the 2021-2022 School Year.

¹¹ Number from 2020-2021 School Year

- Issuance in July 2022

- July 23rd, 2021: Issuance of School P-EBT to school children in SNAP and non-SNAP households to cover May and June benefits

Further, Wisconsin will continue to issue 2020-2021 P-EBT benefits (School P-EBT, Pre-6 P-EBT, and Summer P-EBT) on a case-by-case basis in the event that the State can confirm that a child was denied the full amount of benefits to which they were eligible due to circumstances beyond the family's control. For example, this may include issuing new benefits on behalf of a child for whom benefits were previously but incorrectly issued to one parent when it can now be confirmed that the child was living with a different parent, legal guardian, or foster parent. Additionally, Wisconsin will issue benefits to individual children in the event that they were previously denied or under-issued due to an error made by their school or a state agency. In these such cases, DHS will seek FNS approval prior to performing 2020-2021 corrective issuances.

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

A. Eligible Children

Standard for P-EBT Eligibility

A child is eligible for P-EBT benefits if two conditions are met:

1. The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:
 - a. directly certified or determined “other source categorically eligible” for SY 2021-2022, *or*
 - b. certified through submission of a household application processed by the child’s School Food Authority for SY 2021-2022, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. on the school’s most current prior year list of directly certified children, children determined other source categorically eligible, or children certified by application *and* the School Food Authority has not made a new school meal eligibility determination for the child in SY 2021-2022.
2. The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2020-2021 graduates and other non-students. (*Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.*)
- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals¹²? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.
- How will the State confirm each child’s lack of access to meals at school? Please describe separately for children in public and non-public schools.
- Describe the process that the State will use to update and re-establish each child’s in-person and virtual schedules. 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).
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. **Please address both in detail.** In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

¹² The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

To collect the necessary student learning and P-EBT eligibility information from School Food Authorities (SFAs)¹³ with National School Lunch Program (NSLP) schools, the State will be relying on an enhanced version of a Portal created for the P-EBT program in the 2020-2021 school year. One representative at each SFA will be given access to this Portal on behalf of all of their NSLP schools¹⁴, but this access can be shared with other administrators in their SFA as they deem appropriate. That said, the State hopes to primarily utilize this one SFA representative for all necessary P-EBT communications rather than communicate directly with each individual NSLP school as questions arise or assistance is needed.

The relevant retrospective, student-level information for FRPL eligible students will need to be uploaded into this Portal no less frequently than every other month, ahead of the planned systematic issuances. In order to initially access and share information via the Portal, SFAs will be asked to agree one time to data sharing terms agreed upon by both the Wisconsin Department of Public Instruction (DPI) and the Wisconsin Department of Health Services (DHS) (terms which grant DHS the legal authority to have such student-level information shared directly with them rather than through DPI as a conduit)¹⁵. Once agreed, access to the Portal for the entire school year (August through June) will be granted to each SFA representative in advance of the first planned School P-EBT issuance and will be left open for editing until the stated Portal Cut-Off Dates (see table below). After each Portal Cut-Off Date, access to the Portal will be temporarily closed for data processing for a period of time leading up to the benefit issuance date. During this temporary Portal closure, in-depth discrepancy analysis will take place to ensure that all data shared through the Portal is both comprehensive and accurate. Any clear errors or instances indicative of a misunderstanding of what constitutes a P-EBT Eligible Day will be addressed during this period and prior to the issuance of benefits. Access to the Portal will then re-open after each School P-EBT benefit issuance date. Once re-opened, an SFA will be able to add or edit student attendance information for the prior two months within the Portal as needed (such as in the event that they previously forgot to include an eligible student or under-reported the number of days per month on which a student was eligible for P-EBT). Any added or updated student information for months already included in a prior planned issuance date will be incorporated into the next planned issuance date. An SFA will also have the option to reach out to our P-EBT Support Team if they missed the submission deadline or need to make corrections. Members of the P-EBT Support Team will be assigned a specific caseload of school districts or private or charter schools to manage should questions or the need for corrections for those SFAs arise. As each Portal Cut-Off Date approaches, these P-EBT Support Team members will conduct direct outreach to any SFAs who have not yet uploaded student attendance information for the two months in question and will provide reminders, answer questions, and offer other technical assistance as needed.

¹³ According to the USDA, a School Food Authority (SFA) is the governing body which is responsible for the administration of one or more schools. This term is used throughout this plan in lieu of the term “school district” so as to properly encompass all public, private, and charter school arrangements.

¹⁴ Access to the Portal will not be available for any schools which DPI has identified as ‘virtual academies’ that do not fit the USDA definition of a P-EBT eligible virtual learning scenario, even if the ‘virtual academies’ are NSLP participants. SFAs that contain a combination of ‘virtual academies’ and ‘brick and mortar’ schools will only see the ‘brick and mortar’ schools listed in their Portal.

¹⁵ Until an SFA agrees to these data sharing terms, it will not be able to access the Portal or share information with DHS necessary to issue benefits to its eligible students. DPI will bear the responsibility of following up directly with SFAs that do not agree to the data sharing terms in a timely manner, reiterate its importance, and quell concerns.

Portal Cut-Off Date for SFAs	Months Reported via Portal	Planned Issuance Date	Portal Re-Opens
2/18/2022	August, September, & October	3/5/2022	3/7/2022
3/25/2022	November & December	4/9/2022	4/11/2022
4/29/2022	January & February	5/14/2022	5/16/2022
6/3/2022	March & April	6/18/2022	6/20/2022
7/8/2022	May & June	7/23/2022	7/25/2022

In partnership with DPI, DHS has been encouraging SFAs with NSLP schools to actively solicit free or reduced price meal (FRPL) applications from all eligible students in the 2021-2022 school year. As such, rather than rely completely on FRPL eligibility information from past school years, the State will rely, whenever possible, on new 2021-2022 FRPL eligibility information to determine benefit eligibility for School P-EBT this year.

Data provided through the Portal by SFAs will serve as sufficient verification as to which students are currently enrolled in their school and eligible to receive free or reduced price meals. In Wisconsin, a student can become FRPL-enrolled in one of two ways: (1) through submitting an FRPL application to their school for approval by their school or (2) through direct certification via their enrollment in another public assistance program (such as SNAP). As part of the second ‘direct certification’ route to FRPL enrollment, each SFA is able to pull reports from DCF at any point in order to be sure it is aware of all/any students newly eligible for free or reduced price meals.¹⁶

Based on this (and unlike in previous years), Wisconsin will treat the SFAs themselves as the primary ‘source of truth’ in terms of delineating which students are FRPL-enrolled at any given time during the 2021-2022 school year. At the specified intervals, SFAs will be sharing virtual learning/attendance information for all of their FRPL-enrolled students with DHS via the Portal.¹⁷ After each Portal Cut-Off Date but prior to any benefit issuances, DHS will compare the list of students shared through the Portal to up-to-date DCF data on all directly certified students in Wisconsin. This will help to ensure that all eligible (directly certified) students were reported on via the Portal. After this comparison, in instances in which it becomes clear that an SFA is not

¹⁶ SFAs are required by DPI to access these direct certification reports via DCF a minimum of three times per school year. That said, DHS will instruct SFAs to access this DCF direct certification report just prior to completing/submitted their virtual learning information via the Portal. This means SFAs will be pulling their direct certification reports at least five times during the 2021-2022 school year for the purposes of P-EBT. At each of these five intervals, SFAs will only need to perform what is known as a ‘partial run’ – meaning the report from DCF will only include information regarding any newly/recently directly certified students.

¹⁷ Specifically, when providing information via the Portal, SFAs will be explicitly instructed to only include students who did not graduate prior to the 2021-2022 school year, who live in Wisconsin, or who are enrolled in an NSLP school. Further, as stated, students will be eliminated from eligibility if they are enrolled in ‘virtual academies’ that do not fit the USDA definition of a P-EBT-eligible virtual learning scenario. As part of our data collection efforts, the State received a list from DPI of virtual academies statewide that do not fit the USDA definition of a P-EBT-eligible virtual learning scenario. Student learning information will not be solicited at all from these schools (in other words, the Portal will not be accessible for them).

submitting information for all directly certified students via the Portal, direct outreach will be conducted to remind the SFAs of the importance of accessing DCF direct certification reports just prior to each Portal submission.

The aforementioned, high-level process for obtaining all necessary P-EBT eligibility information is also broken down below:

- One representative from each SFA containing eligible NSLP schools agrees to data sharing terms and is then granted access to submit data via the 2021-2022 P-EBT Portal.
- Just before each Portal Cut-Off Date, the SFA representative performs a ‘partial run’ of directly certified students from DCF.
- The SFA representative combines this ‘partial run’ list with students already known to be FRPL-enrolled through submission of an application to their school.
- For every student on this combined/comprehensive list, the SFA representative compiles (1) virtual learning/attendance information (number of virtual learning days or absences for a COVID-related reason per month, for the months requested at that time) and (2) other demographic information (including parent/guardian/current caregiver information and mailing address).
- The SFA representative uploads all above information into the Portal by the Portal Cut-Off Date.
- After the Portal Cut-Off Date, access to the Portal is closed/restricted until the planned systematic issuance date.
 - o For SFAs which DHS identifies as having not performed the ‘partial run’ and, therefore, not reporting on all eligible students, direct outreach will be conducted to strongly encourage the performance of the ‘partial pull’ prior to future Portal Cut-Off Dates.
- Benefits are issued to eligible students, and access to the Portal is restored.
- Process is repeated.

To continue, it is important to explicitly note that in the 2020-2021 year, the State could not actually issue P-EBT benefits based solely on the FRPL enrollment datasets shared by DPI and DCF and the virtual learning information gleaned from school surveys. Even after a student was verified as being enrolled to receive free or reduced price meals at an NSLP school, an additional and necessary step for issuing benefits revolved around identifying their parent/guardian/current caregiver information and mailing address – pieces of information that were not included in the data shared by DPI, DCF, or by SFAs due to standard processes in place that could not be feasibly altered as well as legal restrictions. For many students, these pieces of information were available elsewhere within the State’s eligibility system – CARES – as a result of the student’s association with an existing public assistance program case. If so, Deloitte assisted DHS in matching a student on the FRPL master list to a case within the CARES system to ensure benefits were sent to the appropriate parent/guardian/current caregiver at the most recently available mailing address.

When a student was verified as FRPL-enrolled (through the data shared by DPI, DCF, and SFAs) but was not associated with an existing CARES case, a simplified application needed to be

submitted on the student's behalf by the parent/guardian/current caregiver in order for benefits to ultimately be issued. As was successfully utilized in the 2020-2021 school year, a family could submit this simplified application (either on their own or with assistance from the P-EBT Support Team) to provide the necessary information that may be missing and allow for the overnight issuance of benefits when applicable. A simplified application did not need to be submitted prior to each planned issuance; instead, information received once through the simplified application was retained and used for future systematic P-EBT issuances.

Unlike the process in the 2020-2021 school year, DHS will request that the Portal submissions from SFAs include not just verification of FRPL enrollment but also the necessary parent/guardian/current caregiver information and mailing address (if/when available). Providing this information to DHS when it is available for a student will allow the State to compare the information to what already exists without our State eligibility system, to create a new case if one does not already exist, and to issue benefits on behalf of the student when applicable without further family intervention (in other words, without the completion of a simplified application). That said, when this parent/guardian/current caregiver and mailing address information is not available via Portal submissions by SFAs, via the State eligibility system, via a simplified application submitted during the 2020-2021 school year, or via other State-accessible sources, a family will need to follow the previous year's process (submitting a simplified application in order for benefit eligibility to be determined and benefits to be sent).

There will be several key partners involved in the successful implementation of P-EBT in the 2021-2022 school year. The high-level (but not exhaustive) list of roles and responsibilities is outlined below. The State is convening regularly with each of these stakeholders to ensure all required tasks are feasible and developed cooperatively.

- Department of Health Services (DHS)
 - o Overall program design, development, and oversight.
 - o Hiring and supervision of P-EBT Support Team dedicated to communication of the P-EBT plan, verification of eligibility via applications, and problem resolution process.
 - o Determination and design of most effective method of student attendance information collection from schools/SFAs statewide.
 - o Monitoring of card issuances and deliveries.
 - o Compile list of schools that meet the USDA definition of P-EBT eligibility (based on information shared by DPI regarding 2021-2022 NSLP participation and statewide 'virtual academies').
 - o Share information with DPI as needed to assist in their performance of outreach to SFAs that have not agreed to the Portal's data sharing terms in a timely manner.
- School Food Authorities (SFAs)
 - o Solicit 2021-2022 school year FRPL applications from eligible families. In a timely manner, approve and track the FRPL applications that are submitted to schools by eligible families.

- Perform ‘partial runs’ of directly certified students through DCF prior to each Portal Cut-Off Date.
- Upload all necessary information into the Portal prior to each Portal Cut-Off Date.
- As needed, disseminate communications to families regarding P-EBT support resources/information and the importance of submitting FRPL applications.
- Department of Public Instruction (DPI)
 - Provide current list of schools that participate in the NSLP/SBP in the 2021-2022 school year and all associated school/district/SFA codes.
 - Provide list of ‘virtual academies’ which DHS can then eliminate from P-EBT eligibility.
 - Provide the contact information for one SFA representative for each SFA in Wisconsin that contains at least one NSLP school.
 - Conduct outreach to SFAs that have not agreed to the Portal’s data sharing terms to reiterate its importance and quell any concerns.
 - Disseminate communications to schools, SFAs, and families regarding program information, eligibility criteria, and important deadlines.
- Department of Children and Families (DCF)
 - Provide list of students (with necessary identifying information) that are enrolled in the NSLP/SBP via Direct Certification prior to the first issuance as well as a list of any newly enrolled students prior to each subsequent issuance.
- Deloitte
 - Enhance the State’s SNAP eligibility system, adding functionality so that applications can be viewed and processed, benefits can be issued, and issues can be resolved in real-time by the P-EBT Support Team.
 - Compare Portal-provided FRPL students to DCF-provided direct certification lists prior to each issuance to ensure all students are identified, targeted outreach can be performed, and benefits can be issued as appropriate.
 - Match FRPL-verified students to existing CARES cases or prior year’s simplified applications, when possible, as a means of issuing benefits. Relatedly, assist in the development and management of the 2021-2022 Simplified Application to help solicit parent/guardian/current caregiver information and mailing address for FRPL-verified students when no existing CARES case or 2020-2021 simplified application can be located.
 - Execute mailings and other communications upon request from DHS.
 - Send benefit issuance files to FIS for completion/execution.
 - Develop Portal and provide technical assistance to DHS and to SFAs as needed.
 - Facilitate ‘catch-up runs’ in between planned systematic issuances as needed.
- FIS
 - Process benefit issuance files once received from Deloitte and issue P-EBT cards.
 - Update and include message inserts mailed with P-EBT cards.
- Statewide Network of Partners
 - Communicate P-EBT information to eligible families, particularly assisting in the engagement of eligible non-SNAP households.

There are a handful of simplifying assumptions Wisconsin intends to employ as it relates to determining student eligibility for School P-EBT. To begin, Wisconsin will be trusting SFAs to only provide a number of P-EBT eligible days in the Portal for months in which a student was enrolled to receive free or reduced price meals. Portal instructions and complementary communications materials developed by DHS will clearly explain (1) what constitutes a ‘P-EBT Eligible Day’ (based on FNS guidance) and (2) for which months we need to know each student’s number of P-EBT Eligible Days (based on when each student became enrolled to receive free or reduced price meals – information received and tracked by SFAs). For example, if a student became FRPL-enrolled in October 2021, the expectation would be that the SFA would list 0 P-EBT Eligible Days in September for that student. In other words, if an SFA uses the Portal to share that a student experienced 0 P-EBT Eligible Days in September and 10 P-EBT Eligible Days in October, it will be assumed that this student was not FRPL-enrolled in September but did become FRPL-enrolled during October.

Unlike in previous years, Wisconsin will not assume P-EBT eligibility back to the beginning of the school year. Instead, their eligibility will be backdated only to cover the full month in which they became FRPL-enrolled. Relatedly, it is understood by SFAs and by the State that once a student is confirmed to be enrolled to receive free or reduced price meals during the 2021-2022 school year, the student will remain FRPL-enrolled for the duration of the 2021-2022 school year (this will be the State’s working assumption unless otherwise informed about specific students).

Additionally, Wisconsin will make the simplifying assumption that virtual learning performed by students at an NSLP-participating school that is not included in the list of virtual academies provided by DPI will be considered potentially eligible for P-EBT benefits (assuming the student and school have met all other eligibility criteria and assuming the virtual learning is happening for a COVID-related reason). Conversely, virtual learning scenarios which would not be eligible for P-EBT benefit consideration include those that take place in a fully virtual academy/institution, as noted by DPI.

Overall, Wisconsin is assuming that any and all data provided by SFAs and by DCF and DPI regarding student eligibility for free or reduced price meals is the best and most recently available data.

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

1. The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.
2. School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).
3. The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.
- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Response: [please use as much space as needed]

DHS will be provided a list from DPI of all eligible Wisconsin SFAs – those that encompass a school or schools that participate in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) and are not considered 'virtual academies'. Virtual academies or fully online learning schools with no assigned/affiliated physical ("brick and mortar") building do not qualify for the NSLP, and children enrolled there do not qualify for P-EBT as a result.

DHS will then solicit information about when each school met the 5-day threshold of reduced attendance or hours directly from SFAs through the use of a Portal, with additional communication and facilitation assistance from DPI (as mentioned in the previous section of this plan).

The Portal will contain multiple parts, all of which will be required for each SFA to complete at least as frequently as every other month. The parts are detailed below. Should an SFA fail to upload information into their Portal in time for inclusion in the upcoming, intended issuance (despite proactive outreach from the P-EBT Support Team as each deadline approaches), the State will assume that the schools in that SFA – and its students – are not eligible for School P-EBT benefits for the period in question. If a deadline is missed, SFAs will have the ability to upload information into the Portal at a later date (when the Portal re-opens), and the information shared will be evaluated and, when applicable, included in the next planned systematic issuance.¹⁸

- Initial, One-Time Screen: Data Sharing Terms
 - o Using language crafted by DPI and approved by DHS’ legal team, each SFA will be asked to confirm that they understand the implications of sharing student-level data directly with DHS for the purposes of P-EBT eligibility and benefit determination.
 - Each SFA will only have to agree to these data sharing terms once and will not be asked to repeat this step in future visits to the Portal.
- Part 1: 5-Day Threshold
 - o Have each of the NSLP schools in your SFA satisfied the 5-Day Threshold? If so, please provide the date for each school.
 - The eligible NSLP schools in the SFA will be pre-populated into the Portal. Additionally, a detailed explanation will be provided (based on USDA guidance) as to how a school satisfies the 5-Day Threshold and how to determine the correct date to provide.
- Part 2: Student Information
 - o Please provide the following information for each student who is currently FRPL-enrolled:
 - Part 2a: Student full name, grade, date of birth, parent/guardian/current caregiver information, mailing address, and other identifying criteria as needed
 - Prior to each issuance, this list will be cross-checked against up-to-date direct certification lists from DCF to be sure that all eligible students are being captured within the Portal.
 - Part 2b: P-EBT Eligible Days (Number of days that each student learned virtually or was absent for a COVID-related reason (“COVID-related absence”) in each month)
 - The Portal will ask that the SFA representative indicate the total number of school days in each month that each student learned virtually or was absent for a COVID-related reason.
 - o In this section, clarifications will be provided as to what counts as a “COVID-related absence” and what does not, in

¹⁸ As needed, the State will explore adding ‘catch-up runs’ in between planned systematic issuances in the event that a significant number of students are not issued benefits on time due to missed submission deadlines by SFAs. That said, although ambitious, it is the State’s goal that all SFAs will upload information into their Portal (with all of the necessary student attendance information) by each of the stated Portal Cut-Off Dates.

accordance with USDA guidance. It will then be the responsibility of each SFA to determine which absences constitute a P-EBT Eligible Day on a student-by-student basis.

- For example, COVID-related absences (and, therefore, P-EBT eligible days) could include (but are not limited to) days on which: a school dictates that a student must remain home after testing positive for COVID, a school dictates that a student must remain home after a family member tests positive for COVID, a school dictates that a student must remain home after their teacher or other school staff member tests positive for COVID, and/or a parent chooses to keep their student out of school due to a COVID exposure or positive test (and the school accepts/marks this as a valid COVID-related absence). A day on which a student misses school due to an illness or incident unrelated to COVID would not be considered a P-EBT Eligible Day. Further, days on which a school suspends bus service or cancels classes due to a general inability to fill the necessary staff positions for reasons not directly related to COVID would not be considered P-EBT eligible days.
- A reminder will also be provided stipulating that a student is only P-EBT Eligible in months during which they were enrolled to receive free or reduced price meals. Zero P-EBT Eligible Days should be reported for months before a student became enrolled to receive free or reduced price meals.
- Once Part 2a is completed, the Portal will also provide an option to select multiple students at a time (including entire grades or even the entire list of students at that school) and simultaneously input the number of days that they all learned virtually in that month. For students who were forced to learn virtually due to quarantines of specific classrooms, grades, or entire schools, we anticipate that this will streamline the time it takes for SFA representatives to complete the Portal.
- The months for which an SFA will be able to provide P-EBT Eligible Days for their students will be restricted based on the 5-Day Threshold Date that the SFA provided in Part 1.
 - If an SFA reported that they did not meet the 5-Day Threshold until November, for example, the Portal will not allow them to upload P-EBT Eligible Days for any of their students for August, September, or October. November would be the first month for which P-EBT Eligible Days would be accepted by the Portal.

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:

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

Response: [please use as much space as needed]

USDA has advised that the Pre-6 P-EBT portion of this plan be submitted separately once guidance is finalized.

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 2021-2022. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

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	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

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-2021-07-16/pdf/2021-15107.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]

As Wisconsin is soliciting student-level information in the 2021-2022 school year, benefits for each student eligible for School P-EBT will be targeted to the exact number of days that he or she learned virtually or was absent for a COVID-related reason, as reported by their SFA via the Portal. Accordingly, for each day that an eligible student learned virtually or was absent for a COVID-related reason, \$7.10 will be issued. While there will not be any publicized ‘maximum monthly benefit amount’ as was the case in 2020-2021, the State will create an internal system cut-off to prevent any student from receiving more than \$163.30 in any month of the 2021-2022 school year. This benefit amount corresponds to 23 days of virtual learning or absence for a COVID-related reason. From August 2021 through June 2022, the maximum number of weekdays (Monday-Friday) in any month – not accounting for typical holidays/school breaks – is 23. Therefore, even if a student learned virtually or was absent for a COVID-related reason on every weekday in a given month, he or she would never be eligible for School P-EBT for more than 23 days. Should a SFA report in the Portal that a student learned virtually or was absent for a COVID-related reason for more than 23 days in a given month, the student will only be systematically issued benefits in

the amount corresponding to 23 days. The full breakdown of monthly benefit amounts can be found in the following table.

Reported # of Virtual Days/Absences for COVID-Related Reason	Monthly Benefit Amount
0	\$0.00
1	\$7.10
2	\$14.20
3	\$21.30
4	\$28.40
5	\$35.50
6	\$42.60
7	\$49.70
8	\$56.80
9	\$63.90
10	\$71.00
11	\$78.10
12	\$85.20
13	\$92.30
14	\$99.40
15	\$106.50
16	\$113.60
17	\$120.70
18	\$127.80
19	\$134.90
20	\$142.00
21	\$149.10
22	\$156.20
23	\$163.30

Importantly, within the Portal, SFAs will be instructed as to how to determine when their schools each met the 5-Day Threshold for the 2021-2022 school year. To alleviate some of the confusion experienced last year, it will be clearly communicated within the Portal itself and within other resources created for SFA representatives that any instance of prolonged virtual learning or absence for a COVID-related reason for at least 5 school days in a row, even if for just one student at the school, would satisfy the 5-day threshold. Based on actual COVID case counts and protocols in place at the time, the State anticipates that the vast majority of eligible NSLP schools will have met this threshold at the very beginning of the school year.

To continue, guidance has already been provided to schools by DPI as to how to delineate absences that occur for a COVID-related reason versus absences that are unrelated to COVID within school attendance/student information systems (SIS). Specifically, in some SFAs, there are unique codes that schools can assign to a student for each day that he or she is attending but learning virtually or is absent for a COVID-related reason. When calculating the number of days to report for each

student in the Portal, only days which were marked/indicated with said codes (when applicable) should be included. In all Portal instructions and other communications regarding the sharing of information via the Portal, DHS and its partners will continue to emphasize the importance of only reporting virtual learning days or absences that occurred for a COVID-related reason.

Further, as is evidenced by the above table, students who are reported as learning virtually or being absent for a COVID-related reason for 0 days in a month will not be systematically issued School P-EBT benefits for that month. That said, as is detailed in other sections of this plan, a family will have the option to reach out to our P-EBT Support Team to inquire about a different benefit amount for a month if they believe their systematic issuance is not accurate (assuming sufficient verification documentation is provided).

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]

The State's timeline is predicated on extensive systems and communications work being put in place, some happening prior to receiving full approval. For example, the State intends to expand upon existing P-EBT communication platforms (websites, flyers, FAQs, Portal) as well as develop new strategic communication materials to be shared with SFAs, families, and other partners throughout the course of the 2021-2022 school year. Additionally, extensive backend systems enhancements will be made to the Portal to accommodate new policy requirements in 2021-2022 and to simplify the previous student learning information collection process.

Following approval, the aforementioned communication materials will be shared with SFAs and families across the state, and necessary preliminary information will be solicited from DPI (such as the full list of NSLP schools/codes as well as the list of SFA representatives and their contact information). DHS will also be working with our EBT vendor – FIS – consistently throughout the entire implementation process to avoid any bottlenecks after approval. The initiation of our high-level timeline is based on the assumption that the State will already have a signed customer agreement with FIS that may only need slight adjustment after FNS approval.

High-Level Tasks to Complete Post-Approval:

- Communications shared with SFAs/school administrators, families, and the public through existing online platforms and outreach partner support
- Training of existing and new P-EBT Support Team staff who will assist with problem resolution processes and continued communications
- Systems updates are completed to support administrative functions for the program (adding comment/document attachment functionality and streamlining problem resolution process)
- SFAs upload information into the Portal prior to first issuance, direct outreach (as needed) and discrepancy analysis begin
- Benefits are issued via FIS
- Process is repeated for subsequent rounds of P-EBT issuances (communications, Portal submission, direct outreach, discrepancy analysis, benefit issuance)

DHS will issue new, generic P-EBT cards to non-SNAP households that do not have a P-EBT card from the 2020-2021 school year. These will resemble the cards issued in the 2020-2021 school year. For households who received P-EBT benefits in the 2020-2021 school year and are eligible for benefits again in this year, we will not issue new P-EBT cards because these households were informed that P-EBT cards could potentially have longer-term uses. For households that may have disposed of their 2020-2021 P-EBT card, a new card will be issued upon request. To receive a new P-EBT card, the household would need to call QUEST Card Services (contact information will be available on our P-EBT websites, on notices mailed to the household, and via our P-EBT Support Team). In contrast, existing SNAP households will receive benefits directly on their current SNAP EBT (QUEST) cards, consistent with the process in 2020-2021.

As was done in 2020-2021, Wisconsin will use sub-benefit types in order to differentiate SNAP, D-SNAP, and P-EBT benefits for reporting purposes. In terms of spending priority for households

which may receive more than one type of benefit, SNAP benefits will be pulled first, D-SNAP benefits (if applicable) will be pulled second, and P-EBT benefits will be pulled third.

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. Unlike in 2020-2021, though, DHS is in the midst of developing the ability to send warning notices to households if/when these P-EBT expungement dates approach.

The return mail process will be managed by dedicated staff within the P-EBT Support Team. The State currently has access to a regular undelivered mail report.²⁰ Our EBT processor (FIS) can supply a report that identifies which pieces of returned mail contained P-EBT cards so that the P-EBT Support Team can proactively facilitate the reissuance of cards. In the event that an updated mailing address is not available in the CARES eligibility system and cards cannot be proactively reissued, the dedicated team will respond to incoming emails and phone calls from these households, research why cards were not received, and reissue when possible. Additionally, the P-EBT Support Team will spot check batches of cards that were mailed to make sure cards were delivered and activated. If cards are found to be undelivered, the problem resolution staff will contact families and resolve address issues.

²⁰ During the 2020-2021 school year, SNAP renewals were over postponed or waived due to COVID. This was likely a factor in how often P-EBT benefits were sent to an incorrect/out-of-date mailing address, as addresses were not being updated within the State's eligibility system with the usual frequency. By the time that P-EBT benefits are issued for the 2021-2022 school year, though, SNAP renewals will likely be back in place. This will mean that mailing addresses for families for whom a case already exists within our State eligibility system will often have increased accuracy.

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 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 and caregivers 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:
 - 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 over the past year, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits

- 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)
- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - 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.
 - 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]

In the 2020-2021 school year, DHS created a large P-EBT Support Team, a specific unit to support case management and problem resolution for all School P-EBT, Pre-6 P-EBT, and Summer P-EBT operations. Throughout 2021-2022, this group will continue to support customer service via a hotline, multiple dedicated email inboxes, direct coordination with SFAs, fair hearings, and other day-to-day management of ongoing P-EBT operations. The hotline number is 1-833-431-2224, the email inbox for the public/families is PEBTsupport@wisconsin.gov, and the email inbox for schools/SFAs is SchoolPEBT@wisconsin.gov.

The P-EBT Support Team employs multiple bilingual staff members and also utilizes the same translation services used by the DHS SNAP team, which will help address challenges encountered by families with limited English proficiency. Children living in foster care are known to the State's eligibility system, so they will be treated in the same manner as children within SNAP households. Children experiencing homelessness are also known to the State's eligibility system. As such, these children already have case numbers which include mailing 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 may help DHS identify and match a child to a SNAP case more efficiently, the P-EBT Support 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 on the simplified application or in conversations with the P-EBT Support Team. Additionally, as with SNAP recipients in Wisconsin who have disabilities, P-EBT recipients with disabilities can request to have notices read to them or explained in a different way. To continue, parents of children without internet access can call the P-EBT hotline with questions. Should the parent/guardian/current caregiver need to fill out a simplified application, they can do so over the phone. Internet access is not an eligibility factor for P-EBT, and, as such, Wisconsin will make every effort to provide the same level of service to those without internet access.

In addition to hiring operational staff, DHS also hired communications specialists last year who will continue to be responsible for supporting the public information campaign for this initiative. This will include regular updates to the DHS P-EBT webpages as well as the development and

dissemination of other print and non-print materials, including letters, brochures, and other informational bulletins. DHS also conducts regular (some weekly, some every other week, some monthly) virtual calls with stakeholders and the public to discuss P-EBT updates, share program information, and answer questions. Webinars or video walkthroughs will also be tweaked from last year or created this year around certain P-EBT topics such as filling out the simplified application, understanding mailed notices, or sharing information via the SFA Portal.

The DHS team (inclusive of the operations and communications staff) will also work directly with DPI to share information about the program directly with SFAs through the DPI administrator's email distribution list and School Nutrition Team bulletins. This email list, disseminated to public and choice schools, advocacy groups, and other stakeholders, boasts a very high open rate. Emails are also published on the DPI website. DPI relationships with advocacy groups can also be leveraged to disseminate information to private schools.

DHS will send one-time notices prior to each systematic P-EBT issuance to all households for which a mailing address is available. These notices will include several P-EBT program details such as benefit issuance dates, benefit amounts, an explanation of what P-EBT benefits are and how they qualified, and information about the problem resolution process including the hotline phone number and PEBTsupport@wisconsin.gov email address. Additionally, through an insert that accompanies new P-EBT cards, DHS will provide information to new P-EBT households on how to use their card, how to set up the PIN (following the State's standard PIN process for SNAP households), general SNAP purchase rules, opt-out language, and confirmation that the card and benefits are non-transferrable. Information contained on each communication can be found below.

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

- Description of the P-EBT program, eligibility information, and the benefit amount being issued to each child in the household as well as the months being covered
- Information as to where benefits can be used and what benefits can be spent on as well as a hyperlink to a DHS website that explains such details, including an explanation of violations and penalties
- Details regarding how to contact the P-EBT Support Team via hotline and/or email address
- Information about contacting the P-EBT Support Team in the event of an incorrect or over-issuance of benefits
- Other details as necessary

The inserts that accompany a new P-EBT card will contain:

- Instructions for activating and using the card, including accessing the [ebtEDGE](#) app/website and creating a secure PIN
- Text that indicates that P-EBT benefits are non-transferable
- Instructions for destroying the card and/or declining benefits

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.

Please describe how your State will manage P-EBT payment errors.

Response: [please use as much space as needed]

Wisconsin will not reduce SNAP payments to compensate for P-EBT over-issuance. With more detailed student-level data being solicited this year, the State is confident in its ability to correctly issue benefits and to reduce the number of over-issuance cases to as few as possible. Additionally, Deloitte will assist in performing an additional data check prior to each systematic issuance to confirm that the State is issuing benefits for each child to the most recent, best available parent/guardian/current caregiver, especially as it pertains to children in out-of-home care placements. That said, in instances in which the State becomes aware of incorrect/over-issuances, the State will abide by the following protocol.

In instances in which benefits are incorrectly assigned (such as to a parent/guardian with whom the child does not reside or in too high an amount) and the error is identified before the benefit issuance process is complete, the State will work to stop the benefits prior to their actual issuance to the recipient. The State will then work to correct the error on the back-end and issue instead to the correct parent/guardian/current caregiver and/or in the correct, full amount.

In instances in which benefits are incorrectly assigned but the error is not identified before the benefits are issued and made accessible to the recipient, the State will work to recoup any benefits that were incorrectly issued but have not already been spent when the incorrectly issued amount exceeds \$500 – the threshold approved in Wisconsin’s Cost Effectiveness Plan. When the incorrectly issued amount is less than \$500, the State will not seek recoupment.²¹ The State will then work to correct the error and re-issue to the correct parent/guardian/current caregiver and/or in the correct, full amount.

In the mailed notices sent to benefit recipients, messaging will be included to instruct families to contact the P-EBT Support Team in the event of an incorrect or over-issuance.

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, adjust our processes accordingly, and alert the USDA.

²¹ The State will seek recoupment of P-EBT benefits in any amount if a case of intentional fraud is identified (such as falsified documents being provided to the P-EBT Support Team).

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, 2021 through September 30 2022. 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 by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

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:

Jonelle Q. Brom

Jonelle Q. Brom, Director Bureau of Eligibility Operations and Training

Signature

Print Name and Title

Jessica Sharkus

Jessica Sharkus, Director-School Nutrition Team

Signature

Print Name and Title

Date of Request 11/22/2021