

**Amendment to Approved State Plan for Pandemic EBT
Children in School and/or Child Care, Summer 2022**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	Amendment to Approved State Plan for Pandemic EBT: Children in School and/or Child Care, Summer 2022
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Summary:	(1) This document is a template to assist States in the development of an amendment to extend their approved State plan to operate Pandemic EBT for school children and for children in child care during summer 2022. (2) This document relates to Section 1101 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, 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 submission of a P-EBT state plan, associated template and related reporting obligations are addressed in OMB# 0584-0660, expiration 11/30/2023.

**Amendment to Approved State Plan for Pandemic EBT
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1. State: Wisconsin
2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA) as amended by the American Rescue Plan Act of 2022
3. **Here's what FNS needs from you:**
 - a. If a State chooses to elect the U.S. standard benefit¹, simply check the box below. Next, go to letter 'c' (*Estimated total amount of P-EBT benefits*) of the template.

By checking this box, we are indicating that our State will use the U.S. standard benefit for the covered summer period. We understand that USDA is only able to offer an interim standard benefit for children in child care at this time; USDA will provide states with additional guidance in mid to late June 2022 / early July that specifies the remaining amount of the USDA standard benefit for children in child care commensurate with the expiration date of the public health emergency.

- b. If a State chooses not to elect the U.S. standard benefit, FNS needs the following information:
 - The number of days for which benefits will be issued as part of the State's covered summer period; and
 - An explanation for how the State arrived at the number of days in the State's covered summer period. USDA will not approve a plan that does not tie the length of its covered summer period to the actual summer 2022 calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.
 - For the child care portion of the plan, USDA can only guarantee benefits through July 9. USDA considers this to be 1/2 through the typical State's covered summer period. For purposes of calculating an interim summer P-EBT benefit for children in child care, States may apply this 1/2 fraction to the full summer benefit that the State has calculated for school children.

¹ The U.S. standard benefit – as defined in Question #5 of FNS' Summer 2022 P-EBT Q&As – is equal to the median number of weekdays in a sample of each State's largest school districts multiplied by the daily P-EBT rate. For States in the continental U.S., that works out to a fixed summer benefit of \$391 per eligible child (55 days at \$7.10 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #15 for a complete set of standard benefit amounts.

- If the State believes that this date is more or less than 1/2 through the typical summer period of the State’s schools, please support your position with data on the most common start dates of the summer break in the State’s schools.
- As discussed in item #16 of USDA’s P-EBT Summer 2022 Q&As, USDA will provide states with additional guidance by mid to late June / early July that specifies the remaining fraction of the full USDA standard benefit that States may provide to children in child care.

Response: [please use as much space as needed]

- c. Estimated total amount of P-EBT benefits the State will issue within this amendment’s date range. (Consult the appropriate table in Section 4, “Benefit Levels.”)
 - Estimated amount issued to school children: \$125,120,000
 - Estimated amount issued to non-school-age children: \$43,010,000²
- d. Estimated total number of children to which the State will issue P-EBT benefits.
 - Estimated number of school children: 320,000³
 - Estimated number of non-school-age children: 110,000⁴
- e. Tentative P-EBT issuance schedule (the dates on which Summer P-EBT benefits will be issued). Note that USDA encourages States to distribute summer benefits in two or even three issuances across the summer, to the extent practical.
 - School-age children
 - Non-school-age children

² This is based on the premise that the federal Public Health Emergency will continue throughout the summer of 2022 and will not necessitate pro-rating of the benefit amount for non-school-age children. If the federal Public Health Emergency ends before the end of the summer of 2022, this group of non-school-age children will only receive a pro-rated benefit amount as part of the first round of issuance in August, per FNS requirement.

³ As is stated within this plan, DHS will obtain datasets from DPI and DCF that, together, are estimated to encompass approximately 315,000 school-age children who meet the eligibility criteria for Summer P-EBT benefits in 2022. This is based on the number of school-age children who have already been reported to DHS via our School P-EBT Student Information Portal to date for the 2021-2022 school year (who are also eligible for Summer P-EBT benefits), the number of school-age children who were eligible to receive Summer P-EBT in the summer of 2021 (approximately 339,000), and the estimated number of school-age children who are expected to apply by 9/1/2022 and become newly enrolled to receive free or reduced price meals at an eligible school for the 2022-2023 school year, among other factors.

⁴ We estimate that approximately 110,000 non-school-age children will be eligible for Summer P-EBT benefits in 2022, based on preliminary tabulations of non-school-age children who will receive SNAP during at least one summer month (June, July, and/or August) and who are projected to receive Pre-6 P-EBT for the 2021-2022 school year as well as the number of non-school-age children who were eligible to receive Summer P-EBT in the summer of 2021 (approximately 91,000).

- Please provide tentative issuance dates for the interim benefit for children in child care, and for any remaining amount that States will be able to issue following the release of additional guidance from USDA in mid to late June / early July.

Wisconsin will distribute Summer P-EBT benefits across two rounds of systematic issuance:

- Round 1: August 2022
 - \$391 issued to school-age children known to be eligible
 - \$391⁵ issued to non-school-age children known to be eligible
- Round 2: October 2022
 - \$391 issued to school-age children who were not captured in the Round 1 issuance but who have since been confirmed as eligible⁶
 - \$391 issued to non-school-age children who were not captured in the Round 1 issuance but who have since been confirmed as eligible⁷

While the State acknowledges the USDA's encouragement to stagger the summer benefit across the summer months, the existing issuance schedule for both School P-EBT and Pre-6 P-EBT are such that funding will already be distributed to eligible families in May, June, and July (per previously approved plans). Coupling this with other planned food assistance program issuances (SNAP and potentially continuing Emergency Allotments) and the State's systematic ability to only issue funds over weekends, issuing the summer benefits as described will be both practical and will alleviate communication issues/public confusion as much as possible. Also, as detailed in the following section of this plan, applications for free or reduced price school meals (FRPL) will continue to be accepted over the summer. For those FRPL applications received by 9/1/2022, if approved, these children would be eligible to receive the full Summer P-EBT benefit amount as part of the second round of issuance. Children who are part of an application received after 9/1/2022 will not be eligible for any Summer P-EBT benefits, regardless of whether their application is approved.

⁵ If the federal Public Health Emergency concludes before the end of the summer of 2022 and necessitates further pro-rating of the benefit amount for non-school-age children (per FNS requirement), DHS will only issue this pro-rated amount in its Round 1 issuance. At the time of this plan's writing, it is likely that the federal Public Health Emergency will continue through the summer, therefore not necessitating any pro-rating of benefits for eligible non-school-age children.

⁶ Should a school-age child be identified as eligible for benefits in advance of the Round 2 issuance who was not captured or identified as eligible in time for the Round 1 issuance, this child will receive the full \$391 as part of the Round 2 issuance. The most likely scenario in which this would occur is if a school-age child submits an application for free or reduced price meals at an eligible school on or before 9/1/2022 that gets approved.

⁷ Should a non-school-age child be identified as eligible for benefits in advance of the Round 2 issuance who was not captured or identified as eligible in time for the Round 1 issuance, this child will receive the full \$391 as part of the Round 2 issuance, assuming the federal Public Health Emergency continues through the summer of 2022. The most likely scenario in which this would occur is if the family of a non-school-age child (who was under age 6 as of 9/1/2022 and who was not eligible for School P-EBT benefits at any point during the 2021-2022 school year) becomes enrolled to receive SNAP benefits during June, July, or August 2022 (not soon enough to be identified prior to the Round 1 August issuance).

- f. Describe how the State will identify eligible school children and children in child care for summer P-EBT. You must address each of the following bulleted items, below, when responding.

For school-aged children:

- Describe how the State will identify school children who received P-EBT benefits during the last month of SY 21-22.
- Describe how the State will identify school children who were eligible for free or reduced price school meals under the NSLP and SBP in SY 21-22 but did not receive P-EBT benefits in the last month of the school year because they attended school in-person and benefitted from a free or reduced price meal service at school. This includes children who were eligible for F/RP meals during the school year and did not receive P-EBT benefits because the children attended school in-person during the school year.
- Describe how the State will identify children who are determined newly eligible for free or reduced price school meals during the covered summer period. States must provide an opportunity for families to apply for free or reduced price meals using the normal application process. States and SFAs should consider maintaining a minimum presence to process Free and Reduced Price Meal applications, perhaps on a part-time or weekly basis. Another alternative is for SFAs to accept new Free and Reduced Price Meal applications during the summer but only process them after the start of the new school year. Children determined eligible on applications *submitted prior to the end of the summer* could then be issued P-EBT benefits retroactively after the start of the new school year. (Note that it is preferable to process applications and issue benefits during the summer period that the benefits are intended to cover).

For children in child care:

- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who received P-EBT child care benefits in the last month of the school year.

- Describe how the State will identify children who are enrolled in SNAP during the covered summer period and who would have received P-EBT child care benefits in the last month of the school year, but did not receive benefits because their child care facility was not closed or operating at reduced attendance or hours in that month, and neither their child care facility nor the child’s residence was in the area of a school that was closed or operating at reduced attendance or hours in that month.⁸
- Describe how the State will identify children who are part of a SNAP household who are newly eligible for P-EBT child care benefits during the covered summer period

Response: [please use as much space as needed]

The Department of Health Services (DHS) will have the Department of Public Instruction (DPI) provide a dataset in early June that includes all school-age children who were enrolled to receive free or reduced price meals during the 2021-2022 school year at a National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) participating school (schools that were eligible to participate in the School P-EBT program in 2021-2022). This dataset will encompass both the school-age children who *did* receive School P-EBT benefits in the final month of the school year as well as school-age children who *did not* receive School P-EBT benefits in the final month (or any month) of the school year – both of whom are eligible for Summer P-EBT benefits in 2022. DHS will also obtain a dataset from the Department of Children and Families (DCF) in early June that includes all school-age children who were directly certified to receive free or reduced price meals during the 2021-2022 school year at a NSLP- and/or SBP-participating school. Deloitte will combine and de-duplicate these two datasets to achieve one comprehensive master list of school-age children (who were FRPL-enrolled in the 2020-2021 school year) who are eligible for the full Summer P-EBT benefit in 2022. (Of note, this is the same process that was successfully followed to determine who was eligible for benefits through Wisconsin’s School P-EBT program in the 2020-2021 school year and to determine many of the school-age children eligible for Summer P-EBT benefits in 2021.)

⁸ Per our approved Pre-6 P-EBT benefit calculation formula, there is no month between September 2021 and June 2022 in which there will not be Pre-6 P-EBT benefits available based on documented declines in CACFP meal claims. In other words, a non-zero amount of Pre-6 P-EBT benefits will be issued to eligible non-school-age children for every month of the 2021-2022 school year. As such, DHS projects that there will be no months for which \$0 in benefits are made available to eligible SNAP families with non-school-age children. All in all, this means that this potentially eligible group as outlined by FNS is not applicable in Wisconsin.

To continue, because FNS guidance was received in May as the school year was already wrapping up for many Wisconsin schools, there is not sufficient time to enlist the necessary summer support from school staff who could accept and process new FRPL applications received over the summer. As such, DPI will instruct school/district staff that these must be processed as soon as they return at the start of the 2022-2023 school year.⁹ To be eligible for Summer P-EBT benefits, the cut-off for receipt of these applications will be 9/1/2022 as this is the start date in two of the largest three school districts statewide for the 2022-2023 school year – Madison Metropolitan School District¹⁰ and Kenosha Unified School District¹¹. Students whose FRPL applications are received by this date and ultimately become approved will receive the full Summer P-EBT benefit amount (\$391) during the second round of issuance, assuming they were not already captured during the first round of issuance in August. To identify school-age children who fall into this group, DHS will have DPI and DCF provide another dataset in early October 2022 like the ones provided in early June. These will include all school-age children who are enrolled at that point in time to receive free or reduced price meals at an NSLP- and/or SBP-participating school. Deloitte will compare these datasets to the earlier versions provided by DPI and by DCF to identify any school-age children newly enrolled to receive free or reduced price meals (those who were not captured as part of the Round 1 issuance). These school-age children will receive the full \$391 benefit amount as part of the Round 2 issuance.

As with our plan for identifying all school-age children eligible for Summer P-EBT benefits, DHS will have Deloitte pull a dataset that includes all non-school-age children who received a non-zero Pre-6 P-EBT sum for any month of the 2021-2022 school year (September 2021 through June 2022). Per FNS guidance, this dataset will then be filtered to only include the children who were eligible to receive SNAP as part of a household that received SNAP benefits in at least one of the summer months (June, July, and/or August). This group of non-school-age children will be eligible to receive the full Summer P-EBT benefit, assuming the federal Public Health Emergency continues through the summer of 2022.¹²

Similarly, for households who apply for and become newly approved to receive SNAP for at least one of the covered summer months (June, July, and/or August), who have a child who was under age 6 as of 9/1/2021 and is eligible for SNAP as part of that household (the criteria for Pre-6 P-EBT eligibility), and whose child did not attend an NSLP- and/or SBP-participating school in the 2021-2022 year (in other words, a child who was not reported via the School P-EBT Student Information Portal by their school or district), the State will also consider this child eligible for Summer P-EBT benefits. This group will be eligible to receive the full Summer P-EBT benefit amount as outlined in the previous paragraph, dependent on the end date of the federal Public Health Emergency.

⁹ DPI will work with DHS over the summer months to develop communications to send to school/district staff to clarify what is needed and by when.

¹⁰ <https://www.madison.k12.wi.us/about/calendar-of-events/school-year-calendar/2022-2023-school-year-calendar>

¹¹ <https://www.kusd.edu/wp-content/uploads/2022/01/calendar-22-23.pdf>

¹² If the federal Public Health Emergency ends before the end of the summer of 2022, this group of non-school-age children will only receive a pro-rated benefit amount as part of the first round of issuance in August, per FNS requirement.

4. Confirmation of remaining elements in the State’s approved school plan and/or child care plan

- Please confirm that your P-EBT summer plan mirrors your approved school year 2021-2022 plan for EBT Processing and Benefit Issuance as well as Customer Service (Sections 7 and 8 of the [SY 21-22 State Plan Template for Pandemic EBT](#)). You do not need to describe in detail how you will handle these matters if your summer plan mirrors your approved school year plan(s); but if your summer plan materially differs from your approved school year plan(s), please describe how.

Response: [please use as much space as needed]

This Summer P-EBT plan mirrors the approved school year 2021-2022 plans for EBT Processing and Benefit Issuance as well as Customer Service.

5. Benefit Levels

A. U.S. Standard Benefit

Standard Benefit for School Children

2022 Covered Summer Period	U.S. Standard P-EBT Benefit School Children		
	Median Length of Covered Summer Period (weekdays)	Daily P-EBT Rate	Standard Benefit
Contiguous U.S.	55	\$7.10	\$391
Alaska	55	11.44	629
Hawaii, Guam, Virgin Islands, Puerto Rico	55	8.28	455

Wisconsin will utilize the standard benefit for Summer P-EBT of \$391 total per eligible school-age child.

Standard Benefit for Children in Child Care (Interim)

2022 Covered Summer Period	U.S. Standard P-EBT Benefit Children in Child Care (Interim)			
	Median Length of Covered Summer Period (weekdays)	Length of the Summer During the Public Health Emergency	Daily P-EBT Rate	Interim Standard Benefit
Contiguous U.S.	55	1/2	\$7.10	\$195
Alaska	55	1/2	11.44	315
Hawaii, Guam, Virgin Islands, Puerto Rico	55	1/2	8.28	228

Wisconsin will also utilize the standard benefit for Summer P-EBT of \$391 total per eligible non-school-age child. This amount will be issued to all eligible non-school-age children during the first round of issuance. Should the federal Public Health Emergency not continue throughout the summer of 2022, the amount issued to these children will be re-evaluated and pro-rated accordingly per FNS requirement.

State-Determined Benefit, Based on Daily Rate

Note: The daily benefit amount – \$7.10 – is only needed if a State elects to set its own covered summer period length; that is to say, if a State declines to use the U.S. standard benefit.

2022 Covered Summer Period	Free Reimbursements			
	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>

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.

Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. In general, conditions related to benefit issuance reporting, administrative funding, and release of information remain in effect for the covered summer period. 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.

Reminder

If the State needs to make any significant changes to its Summer 2022 plan after approval, the State needs to submit an amendment to FNS that describes the change and its impact on operating summer P-EBT. USDA will review the amendment and approve allowable amendments.

Signatures and Titles of Requesting SNAP and Child Nutrition State Agency Officials:



Signature

[Print Name and Title]

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



Signature

[Print Name and Title] Jessica Sharkus, Director-School Nutrition Team

Date of Request: 6/1/2022