



Food and Nutrition  
Service

1320 Braddock Place  
Alexandria, VA  
22314

November 24, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Michigan's State Plan for Children in Schools,  
School Year 2021-2022

**TO:** Vista Fletcher  
Regional Administrator  
Midwest Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act), as amended, authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Michigan's enclosed plan to operate P-EBT for children in schools.

### **Summary of State's Plan**

The Michigan Department of Health and Human Services and the Michigan Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The State's plan for school children covers the months of September 2021 through June 2022.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service at school.

### **Children in Schools**

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on eligibility data from the most recent prior year will have a means to address that they do not issue benefits to school year 2020-2021 graduates and other non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, Michigan will:

- rely entirely on new free or reduced price school meal eligibility determinations in SY 2021-2022; school districts are collecting new applications and conducting direct certification and are not relying on SY 2019-2020 or SY 2020-2021 eligibility,

- tentatively issue benefits from September through December in a single distribution in March,
- issue benefits from January and February in a single issuance in April,
- issue benefits for the rest of the school year retrospectively on a monthly basis,
- collect each school building’s most frequently occurring student learning method (in-person, fully virtual, or hybrid) from school districts for each month:
  - issue the same benefit for each eligible child in a school building based on the building’s most frequently occurring learning method,
  - the State will collect this information in February (for the months of September through December), collect information in March (for the months of January and February), and then on a monthly basis for the month proceeding the issuance month,
  - the State will collect learning method at the school building level because it is prohibited from collecting student-level learning methods from its school districts,
  - for the purposes of SY 21-22, a “hybrid” schedule is one in which a school moved from a fully in person schedule to a fully virtual schedule due to COVID:
    - students in a school that meets the definition of a “hybrid” schedule for a month will receive a benefit consistent with the actual number of virtual learning days at that school for that month,
- establish a “reconsideration” process for households of children whose individual schedules justify a higher benefit than their school building’s default method:
  - households will submit a standard reconsideration form with documentation from their school confirming their claim,
  - the State will review the documentation and confirm free or reduced price eligibility before issuing an adjusted benefit that is consistent with the actual number of virtual learning or COVID-related absence days recorded by the school for that student.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

### **Estimated Caseload and Value of P-EBT Benefits**

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State’s plan.

- Michigan estimates that it will issue \$77.8 million to approximately 90,000 school children for school closures and reductions in attendance and hours extending from September 2021 through June 2022.

**Release of Information**

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Michigan. Section 1101(e) of the Act states, “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.”

**Plan Timetable and Revisions**

Michigan will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

**Civil Rights**

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

**Administrative Funds**

The Michigan Department of Health and Human Services will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State’s Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State’s operational plan evolves.

**Reporting**

The Michigan Department of Health and Human Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Michigan's exceptional efforts to maintain children's access to nutritious meals, and understands that even as the nation recovers from this difficult time, State agencies and local program operators will still face any number of challenges. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long  
Administrator