



Food and Nutrition
Service

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May 3, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Michigan's State Plan for Children in Child Care**

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

The Families First Coronavirus Response Act (P.L. 116-127; the Act) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260) authorized a temporary assistance program for households with 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 child care.

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 SNAP-enrolled children in child care covers the months of October 2020 through June 2021.

Children in child care are eligible for benefits if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. 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 through their covered child care facility.

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the State will ensure that children who receive a benefit through P-EBT's child care component do not also receive a benefit through P-EBT's school component for the same month.

In addition, Michigan will:

- identify the county in which each SNAP-enrolled child under age 6 resides,
- for each month from October through the end of the June, determine P-EBT eligibility for non-school aged children under age 6 in an active SNAP group.

- Where school P-EBT has been issued for a group member, Michigan will issue an equivalent benefit amount to the non-school group member, or
- for all other non-school aged children in an active SNAP group, Michigan will issue benefits based on the school modality with the highest benefit amount for the child's county of residence,
- for SNAP-enrolled child who are age 6 but not enrolled in school, families can request benefits through a reconsideration process; the families will provide the name of the child and the name and address of their child care provider:
 - the state will confirm the child's SNAP enrollment,
 - the state will identify the appropriate benefit for the child based on the modality of schools in the same county (as described above), and
 - for these children, Michigan is making the simplifying assumption that the child care provider meets the definition of a "covered child care facility,"
- monitor non-school student level modality data retroactively on a quarterly basis,
- issue benefits for the months of October through March in a single issuance in June, and
- issue benefits for the months of April through June in a single issuance in July.

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 \$159.3 million to approximately 170,000 SNAP-enrolled children in child care from October 2020 through June 2021.

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 commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs