



Food and Nutrition
Service

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February 15, 2023

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Michigan's State Plan for Children in Schools
and Child Care, School Year 2022-2023

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 and child care.

Summary of State's Plan

The Michigan Department of Health and Human Services (MDHHS) and the Michigan Department of Education (MDE) 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 covers the months of September 6, 2022 through May 11, 2023.

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. Children in child care are eligible 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 schools or child care facilities.

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 2021-2022 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. The state will also provide a path for households with eligible homeschooled children and children in fully virtual schools to receive benefits; these children may be eligible if they began homeschooling or enrolled in fully virtual school due to concerns about the COVID health emergency.

In addition, Michigan has or will:

(for children currently enrolled in NSLP-participating schools)

- communicate the P-EBT eligibility requirements to SFAs including current eligibility for free or reduced price meals and lack of access to meals at school due to a COVID-related absence or school-approved COVID-related virtual learning day,
- 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 22-23, 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:
 - ***because most schools are operating fully in-person schedules, almost all benefits will be distributed through the reconsideration process,***
 - households will submit a standard reconsideration form to the state,
 - households must submit forms no later than June 30, 2023,
 - households will attest on the form that their children missed school on specific days due to a school-approved COVID-related absence or COVID-related virtual learning day,
 - households will have their children’s school confirm that the days are COVID-related before submitting the form to the state,
 - the state will review the documentation and confirm free or reduced price eligibility before issuing a benefit that is consistent with the actual number of virtual learning or COVID-related absence days recorded by the school for that student on or before May 11, 2023,
- issue benefits to children whose benefit is based on their school building’s learning method as follows:

- issue benefits for September 2022 through December 2022 in a single issuance in April 2023,
- issue benefits for January 2023 through February 2023 in a single issuance in May 2023,
- issue benefits for March 2023 through May 11, 2023 in June 2023,
- issue benefits to parents through the reconsideration process as reconsideration forms are approved, but no later than September 30, 2023.

(for eligible children attending non-NSLP virtual schools and eligible homeschooled children)

- conduct a public information campaign to encourage households of potentially eligible children to apply for benefits through the state's P-EBT website:
 - the state's public information campaign will clarify that P-EBT eligibility applies to a well-defined, narrow subset of virtual school and homeschooled children,
 - the application will include a section equivalent to a school year 2022-2023 free and reduced price meal application, it will require applicants to include documentation to support the application's income sources, and it will include a set of supplementary questions to confirm the remaining eligibility criteria:
 - all applicants will be asked to attest whether or not their child is attending a non-NSLP virtual school or is homeschooled **due to concerns about COVID:**
 - for homeschooled children, applicants will also be informed that their child must be registered with Michigan Department of Education (MDE); MDE will then verify that the student is homeschool registered,
 - for students enrolled in non-NLSP participating fully virtual institutions, the state will confirm enrollment using information contained in the Michigan Student Data System (MSDS),
 - except for the subset of children who entered school after the start of the pandemic and have always been homeschooled or always attended a fully virtual school, the state will confirm that the child was previously enrolled in an NSLP-participating school on or after January 27, 2020 using the MSDS,
 - the application will require parents to promptly notify the state if their children return to an in-person school during the school year,
 - the state will use the income documentation provided by applicants at the time of application to verify their income eligibility as follows:
 - the state will confirm that the documentation matches the income entered on the application for the first 100 applications received,

- if the error rate on the first 100 applications is below 5 percent, the state will review and verify the documentation for 10 percent of remaining applications. If at any time, the error rate rises above 5 percent, the state will resume verifying documentation for all applicants,
- issue benefits to all homeschooled and virtual school students for P-EBT-eligible days through May 11, 2023 as applications are approved, but no later than September 30, 2023.

Children in Child Care

At a minimum, the state will identify all children under age 6 who are enrolled in SNAP in the benefit month. 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 has or will:

- identify SNAP-enrolled children under age 6,
- identify and issue pro-rated P-EBT benefits for children under 6 in households that applied for SNAP between May 1 and May 11, and were approved to receive SNAP benefits for that time period,
- for each month from September through May, determine if there has been a statewide reduction in access to child care by comparing Child and Adult Care Food Program (CACFP) lunch claims since the start of SY 2022-2023 to the same months prior to the pandemic,
- issue an average benefit to all eligible children statewide for the months Michigan experienced a reduction in child care access:
 - determine the reduction in claims for September 2022 through January 2023 compared to September 2019 through January 2020 to calculate and issue benefits for September 2022 through January 2023,
 - determine the reduction in claims for February through March (or possibly April 2023) compared to February 2020 and March 2019 (or possibly April 2019) to calculate and issue benefits for February through May 11, 2023,
 - apply the calculated reduction to the average number of P-EBT-eligible instructional days for school children in the same months (from the state's approved plan for school children), multiplied by the daily benefit amount, to determine the statewide average monthly benefit,
- provide USDA with the state's tentative average benefit for confirmation prior to issuing benefits for the fall and spring semesters,
- confirm that lunch claims, for the most current months in spring 2023 where complete data are available, have not returned to pre-pandemic levels before issuing benefits for those months or subsequent months,

- tentatively issue benefits for the months of September through January in June 2023,
- tentatively issue benefits for the months of February through May 11, 2023 in July 2023.

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 \$84 million to approximately 90,000 school children for school closures and reductions in attendance and hours extending from September 6, 2022 through May 11, 2023.
- Michigan estimates that it will issue \$38.1 million to approximately 170,000 SNAP-enrolled children in child care from September 6, 2022 through May 11, 2023

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 by not discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. The state will also provide meaningful access to its programs and activities for individuals who are limited English proficient, and provide equal access to individuals with disabilities.

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 values Michigan's partnership in the administration of Pandemic EBT. FNS stands ready to provide additional support as needed. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long
Administrator