

**Amendment to Approved State Plan for Pandemic EBT  
Children in School and/or Child Care, Summer 2021**

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| <b>Issuing Agency/Office:</b> | FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program   |
| <b>Title of Document:</b>     | Amendment to Approved State Plan for Pandemic EBT: Children in School and Child Care, Summer 2021   |
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| <b>Date of Issuance:</b>      | April 26, 2021  |
| <b>Replaces:</b>              | N/A   |
| <b>Summary:</b>               | (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 2021. (2) This document relates to Section 1106 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) |
| <b>Disclaimer:</b>            | The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.   |

*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. This emergency information collection (IC) will be replaced by a full IC package to be submitted to OMB for approval prior to its expiration date of 8/31/21. All components of this summer 2021 P-EBT package will be addressed in the full IC package.*

**Amendment to Approved State Plan for Pandemic EBT  
Children in School and/or Child Care, Summer 2021**

1. State: Wisconsin

2. **Primary Citation:** Families First Coronavirus Response Act (FFCRA) as amended by the American Rescue Plan Act of 2021

3. **Here's what FNS needs from you:**

- a. If a State chooses to elect the U.S. standard benefit<sup>1</sup>, simply check the box below. Next, go to letter 'c' (*Estimated total amount of P-EBT benefits*) of the template.

|   |
|---|
| <input checked="" type="checkbox"/> <i>By checking this box, we are indicating that our State will use the U.S. standard benefit for the covered summer period.</i> |
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- 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 2021 calendars of an enrollment-weighted average, or the median, of a representative sample of its school districts.

**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.")

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<sup>1</sup> The U.S. standard benefit – as defined in Question #5 of FNS' Q&A document titled, "Summer P-EBT Q&A" – is equal to the median number of weekdays in the sampled 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 \$375 per eligible child (55 days at \$6.82 per day). The U.S. standard benefit is higher for Alaska, Hawaii, and the territories; see Q/A #14 for a complete set of standard benefit amounts.

- Estimated amount issued to school children: \$87,375,000
- Estimated amount issued to non-school children in child care: \$36,091,125

**d.** Estimated total number of children to which the State will issue P-EBT benefits.

- Estimated number of school children: 233,000
- Estimated number of non-school children in child care: 96,243

At the time of this plan's submission, we do not yet have access to the total number of school children nor the total number of non-school children in childcare who will receive non-zero P-EBT sums at any point during the 2020-2021 school year. Likewise, we do not yet have access to the numbers of children who recently or will soon become eligible for free or reduced-price meals in May or June 2021. Instead, the above numbers represent the approximate number of school children and estimated number of non-school children in childcare who will have received a non-zero sum of P-EBT benefits as part of each program's respective first issuance period (August through November for School P-EBT and October through December for Pre-6 P-EBT). To date, we have only issued benefits to school children to cover the months of August through November. Similarly, we have not yet issued any benefits for Pre-6 P-EBT, but early data processing suggests that the number above is a fair estimate for the months of October through December. We expect that these numbers (and the corresponding P-EBT benefit estimates in part C) may be under-estimates, as there may be additional children who did not receive benefits in the early months of the 2020-2021 school year (and are, therefore, not captured in the number above) but who may begin learning virtually and qualify for benefits during the later months of the 2020-2021 school year. These numbers may also be under-estimates, as additional children may apply for and become enrolled in free or reduced-price meal programs at their schools in May or June (but may not be issued any non-zero sum of P-EBT benefits based on reported school learning model).

**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 children
- Children in child care

We will issue the full summer benefit to all school children and non-school children in child care who are known to be eligible on the weekend of 8/21/2021 (tentatively). For any school children or non-school children in child care not captured in this late August issuance (due, for example, to applying for the free/reduced price meal program during the summer months), we will offer a second issuance of the full summer benefit in late September. As detailed in the following section of this plan, applications for free/reduced price school meals will continue to be accepted over the summer. For those free/reduced price meal applications received by 9/1/2021, if approved, these children would be eligible to receive the full summer P-EBT benefit amount as part of the second, late September issuance round. Children who are part of an application received after 9/1/2021 will not be eligible for any summer P-EBT benefits, regardless of whether their application is approved. While the State acknowledges the USDA's encouragement to stagger the summer benefit across the summer months, the existing issuance schedule for both P-EBT and Pre-6 P-EBT are such that funding will already be distributed to eligible families at multiple points in May, June, and July (per previously approved plans). Coupling this with other planned food assistance program issuances (SNAP and Emergency Allotments) and the State's systematic ability to only issue funds over weekends, issuing the summer benefit as described will be both practical and will alleviate communication issues/public confusion as much as possible.

- 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 20-21.
- 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 20-21 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 SNAP-enrolled children who received P-EBT child care benefits in the last month of the school year.
- Describe how the State will identify SNAP-enrolled children 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.
- 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 Deloitte pull a dataset that includes all school children who received a non-zero P-EBT sum in any month of the 2020-2021 school year (August 2020 through June 2021). In conjunction with the Department of Public Instruction (DPI), the State will also obtain access to a dataset that includes any school children who are enrolled in the free or reduced-price school meal program in May 2021 or June 2021 (the final month of the school year, varies from school to school) but who were not issued any P-EBT benefits for the 2020-2021 school year (presumably due to their school reporting through surveys that the majority of students in their grade were learning in-person). After filtering out any students who, after the conclusion of the 2020-2021 school year, are no longer enrolled in Wisconsin schools because they no longer reside in Wisconsin, two datasets will be combined to serve as the State’s “school children source of truth” – the list of all known school-age children who are eligible to receive the full summer P-EBT benefit.

In other words, our “school children source of truth” will include two unique groups of school children: (1) any student who received a non-zero sum of P-EBT benefits during any month of the 2020-2021 school year and (2) any student that was enrolled in the free or reduced price meal program during the months of May or June at a school that participates in the National School Lunch Program and/or School Breakfast Program but who received zero dollars in P-EBT benefits during the 2020-2021 school year.

As with our plan for identifying all school children eligible for the summer P-EBT benefit, DHS will have Deloitte pull a dataset that includes all non-school children in childcare who received a non-zero P-EBT sum in any month of the 2020-2021 school year (October 2020 through June 2021). Per FNS guidance, this dataset will then be filtered to only include the children who were part of a household that received SNAP benefits in at least one of the summer months (June, July, and August). This list will serve as the State’s “non-school children in childcare source of truth” – the list of all known non-school children in childcare who are eligible to receive the full summer P-EBT benefit. These two “source of truth” documents will be combined to serve as the full, most up-to-date list of Wisconsin children known to be eligible for the summer P-EBT benefit.

Similarly, for households that apply for and become newly approved to receive SNAP over the covered summer period (before 9/1/2021) and that have children who were under age 6 as of 10/1/2020 (the criteria for Pre-6 P-EBT eligibility) and whose children did not attend a National School Lunch Program (NSLP) school in the 2020-2021 year (in other words, children who were not eligible in the 2020-2021 school year to receive school P-EBT benefits), the State will assume these children to also be eligible for the full summer P-EBT benefit.

To continue, DPI is exploring the possibility of utilizing USDA FY21 P-EBT Local Level Administrative Cost Grant funding to retain select school/district-level employees over the summer months so that they can continue to receive, process, and approve applications for free and reduced price meals that come in over the summer months. In the event that the State does not have sufficient time to enlist the necessary summer support from school staff, free and reduced price meal applications received over the summer will be processed as soon as school/district staff return prior to the start of the 2021-2022 school year. To be eligible for the full summer benefit, the cut-off for receipt of these applications will be 9/1/2021 as this is the most common school year start date in two of the largest three school districts statewide – Madison Metropolitan School District<sup>2</sup> and Kenosha Unified School District<sup>3</sup> (additionally, this was the most common start date for all schools in the 2020-2021 year).

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<sup>2</sup> <https://www.madison.k12.wi.us/files/www/uploads/2021-22schoolcalendar.pdf>

<sup>3</sup> <https://www.kusd.edu/sites/default/files/calendar-21-22.pdf>

#### 4. Benefit Levels

##### A. U.S. standard Benefit

| 2021 Covered Summer Period                | U.S. Standard P-EBT Benefit                       |                  |                  |
|---|---|------------------|------------------|
|   | Median Length of Covered Summer Period (weekdays) | Daily P-EBT Rate | Standard Benefit |
| Contiguous U.S.                           | 55  | \$6.82           | <b>\$375</b>     |
| Alaska                                    | 55  | 10.99            | <b>604</b>       |
| Hawaii, Guam, Virgin Islands, Puerto Rico | 55  | 7.97             | <b>438</b>       |

Wisconsin will utilize the standard benefit for Summer P-EBT of \$375 total per eligible child.

##### B. State-Determined Benefit, Based on Daily Rate

Note: The daily benefit amount – \$6.82 – 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.

| 2021 Covered Summer Period                | Free Reimbursements |           |        |               |
|---|---------------------|-----------|--------|---------------|
|   | Lunch               | Breakfast | Snack  | Daily Total   |
| Contiguous U.S.                           | \$3.60              | \$2.26    | \$0.96 | <b>\$6.82</b> |
| Alaska                                    | 5.79                | 3.64      | 1.56   | <b>10.99</b>  |
| Hawaii, Guam, Virgin Islands, Puerto Rico | 4.20                | 2.64      | 1.13   | <b>7.97</b>   |

**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-2020-07-22/pdf/2020-15764.pdf>

#### Civil Rights Statement

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

The State’s plan for administering Summer P-EBT will mirror its approved plan for School P-EBT as it relates to matters of civil rights, equitable access, communication to and service of marginalized communities, overall public information sharing, and dispute resolution.

#### 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 2021 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

\_\_\_\_\_  
Signature  
Print Name and Title

**Date of Request:** \_\_\_\_\_