



Food and Nutrition  
Service

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April 22, 2022

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Wisconsin's State Plan for Children in Child Care,  
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 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 Wisconsin's enclosed plan to operate P-EBT for children in child care.

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

The Wisconsin Department of Health Services and the Wisconsin Department of Public Instruction 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 September 2021 through June 2022.

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 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, Wisconsin has or will:

- identify SNAP-enrolled child under age 6,
- for each month from September through April, 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 2021-2022 to the same months prior to the pandemic,

- issue a monthly benefit to all eligible children for the months that they were enrolled in SNAP and Wisconsin experienced a reduction in child care access:
  - calculate the reduction in CACFP lunch claims by comparing current lunch claims to the same months prior to the pandemic:
    - use the reduction in claims for September-December 2021 compared to September-December 2019 to issue benefits for each of the months of September 2021-January 2022,
    - use the reduction in claims for January-April 2022 compared to the sum of claims for January-February 2020 and March-April 2019 to issue benefits for each of the months of February-June 2022,
  - multiply the reduction in claims by the average monthly number of instructional days for school children (18 days), and by \$7.10, to determine the average monthly benefit:
    - issue the monthly benefit to children for each month that they were enrolled in SNAP,
    - Wisconsin schools set their own school calendars based on a minimum number of instructional hours rather than days; these hours are roughly equivalent to a 180-day school year; over 10 benefit months, that gives an average 18 instructional days per month,
  - conduct a statewide analysis of P-EBT eligibility for the spring semester months of February-June 2022; if this analysis shows that there is no longer reduced access to child care for a month within the period in question, Wisconsin will not assign benefits for that month,
- provide USDA with their tentative average benefit for confirmation prior to issuing benefits,
- tentatively issue benefits for both sets of months 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.

Wisconsin estimates that it will issue \$30 million to approximately 90,500 SNAP-enrolled children in child care 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 Wisconsin. 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**

Wisconsin 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**

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

FNS appreciates Wisconsin’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