

**State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School and Child Care, 2020-2021
Document ID:	
Z-RIN:	
Date of Issuance:	January 29, 2021
Replaces:	N/A
Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for school children during school year (SY) 2020-2021 and for children in child care during federal fiscal year 2021. (2) This document relates to Section 4601 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) and the Consolidated Appropriations Act, 2021 (P.L. 116-260).
Disclaimer:	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 P-EBT Assistance for Children in Schools and Child Care should be covered under an Emergency Information Collection Request for the Pandemic EBT (Schools), to be adjusted as appropriate, which is currently under review at OMB. Once OMB has approved the request and assigned the OMB# Control Number, FNS will include the necessary information on the State Plan.

State Plan for Pandemic EBT
Children in School and Child Care, 2020-2021

1. State: Wyoming

2. **Primary Citations:** Families First Coronavirus Response Act (FFCRA);
Continuing Appropriations Act, 2021 and Other Extensions Act;
Consolidated Appropriations Act, 2021

3. **Executive Summary:**

Please provide the following data. In addition, please include a statement indicating that you commit to informing USDA of any significant increase or decrease in these data points during the *date range*¹ covered by this initial plan (or subsequent amendment).

Wyoming commits to informing USDA of any significant increases or decreases in these data points during the coverage period.

Note that P-EBT benefits for school children are available from the start of school year 2020-2021. P-EBT benefits for children in child care are only available from the start of federal fiscal year 2021, or October 1, 2020.

- a. The *date range* covered by this State plan or amendment
 - for children in school: August 1, 2020 – May 31 2021
 - for children in child care: October 1, 2020 – May 31, 2021
- b. Estimated monthly and total *amount* of P-EBT benefits the State will issue within this plan/amendment's date range.
 - Estimated amount issued to school children in SNAP households.
 - Estimated amount issued to school children in non-SNAP households
 - Estimated amount issued to non-school children in child care

Wyoming estimates issuing approximately \$2,123,072 in P-EBT benefits to school children, along with \$3,280,000 to non-school children under age 6 and enrolled in SNAP. The total estimated P-EBT issuance is \$5,403,000 for the 2020-2021 school year.

Wyoming estimates that \$1,486,000 will be issued to children in non-SNAP households and \$3,917,000 will be issued to children in SNAP households.

- c. Estimated total *number* of children to which the State will issue P-EBT benefits.
 - Estimated number of school children in SNAP households
 - Estimated number of school children in non-SNAP households
 - Estimated number of non-school children in child care

¹ The date range covered by P-EBT State plan or amendment. For example: a State's initial plan could cover August 31 through September 30, 2020; and a later amendment could cover October 1, 2020 through December 31, 2020.

Wyoming estimates issuing P-EBT benefits to approximately 8,170 students who qualify for P-EBT based on school-based closures of at least 5 consecutive days. In addition, Wyoming plans to request student-level data for students who participated in Classroom-Based Virtual Education (CBVE) during the 2020-2021 school year from school districts in Fall 2021.

Wyoming estimates that 30% of eligible school children reside in SNAP households and the other 70% of children reside in non-SNAP households.

Wyoming also estimates issuing P-EBT benefits to approximately 5,000 non-school children under age 6 who were enrolled in SNAP on/after October 1, 2020.

- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²

Wyoming anticipates spending \$438,369 in administrative funds.

- e. Tentative P-EBT issuance schedule (the dates on which you will issue P-EBT benefits).
- School children in SNAP households
 - School children in non-SNAP households
 - Children in child care

Wyoming anticipates issuing P-EBT benefits to school children and non-school children in a single issuance approximately 31 days after FNS plan approval, with a second issuance reserved in case of necessary data corrections.

² Note that States may only claim 100% reimbursement for P-EBT administrative expenses incurred from October 1, 2020 forward.

4. P-EBT for School Children

A. Eligible Children

Standard for P-EBT Eligibility

A child is eligible for P-EBT benefits if two conditions are met:

The child would be eligible for free or reduced-price meals if the National School Lunch Program and School Breakfast Program were operating normally. This includes children who are:

directly certified or determined “other source categorically eligible” for SY 2020-2021, **or** certified through submission of a household application processed by the child’s school district for SY 2020-2021, **or** enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, **or** directly certified, determined other source categorically eligible, or certified by application in SY 2019-2020 **and** the school district has not made a new school meal eligibility determination for the child in SY 2020-2021.

The child does not receive free or reduced-price meals at the school because the school is closed or has been operating with reduced attendance or hours for at least 5 consecutive days in the current school year. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours due to COVID-19.

- Describe how the State will identify eligible school children for P-EBT. Also describe what measures the State will take to prevent the issuance of benefits to school year 2019-2020 graduates and other non-students.

The Wyoming Department of Education (WDE) has access to student enrollment files that includes all information on eligibility for Free and Reduced-Price (F/RP) school meals and mailing addresses. This information served as the basis for Wyoming’s successful direct issuance of P-EBT benefits to eligible children for the 2019-2020 school year.

Wyoming will only include F/RP eligible students who were enrolled during the 2020-2021 school year in schools that participated in the National School Lunch Program (NSLP) during the current or previous school year (i.e. 2019-2020 school year) in P-EBT. Students who graduated after the 2019-2020 school year, disenrolled in school, or were enrolled in an ineligible school during the 2020-2021 school year will be excluded from P-EBT.

- How will the State determine and/or confirm each child’s eligibility for free or reduced-price meals? Please describe separately for SNAP-recipient and non-SNAP-recipient children, children in public and non-public schools, new students (such as kindergarteners and transfer students), and children who become eligible during the school year.

For the 2020-2021 school year, Wyoming intends to use existing student enrollment files to identify children enrolled in public schools who are potentially eligible for P-EBT based on their eligibility for F/RP meals. This student enrollment information comes from the WDE-684 – the “WISE Certified Teacher-Course-Student Enrollment Data Collection” – which is the authoritative collection of student-level demographic and course information in Wyoming. (See <https://edu.wyoming.gov/data/dcs/> for more information.)

For students who received a new F/RP eligibility determination during the 2020-2021 school year, current year eligibility will be used. For students who did not receive a new F/RP eligibility determination during the 2020-2021 school year because the school was utilizing COVID-19 related waivers to serve meals to all students and did not proactively collect new F/RP meal applications, the student’s F/RP eligibility determination from the 2019-2020 school year will be used.

In Wyoming, there are 8 private schools that participate in the NSLP that are not included in the WDE-684 data collection (WDE-684) that will be used to identify students eligible for P-EBT. Only one of these schools (Saint Stephens, a Bureau of Indian Education school) had a school-wide closure during the 2020-2021 school year that qualified all students for P-EBT benefits. WDE will use an alternative data collection (WDE-686) to identify these students.

- How will the State confirm each child’s lack of access to meals at school? Please describe separately for SNAP-recipient and non-SNAP-recipient children, and children in public and non-public schools.

Although most Wyoming schools were open for full-time, in-person learning throughout the 2020-2021 school year, 8 school districts utilized fully-remote and/or hybrid schedules for at least 5 consecutive days. This includes 4 school districts under a tribal stay-at-home order from the beginning of the school year in August 2020 through mid-February 2021. Wyoming proposes to issue P-EBT benefits to all students eligible for F/RP meals in these schools.

Wyoming’s 40 other school districts were open for full-time, in-person learning, but families were given the option to participate in various forms of virtual learning. Overall, WDE estimates that approximately 15% of all students opted into virtual learning for at least 5 consecutive days during the 2020-2021 school year.

Three distinct types of distance learning occurred in Wyoming during the 2020-2021 school year: (1) Virtual Education, (2) Classroom-Based Virtual Education, and (3) Remote Education.

- (1) Virtual Education (VE) - VE existed in Wyoming statute before the COVID-19 pandemic and served a small number of students statewide. VE expanded considerably during the 2020-2021 school year in response to the pandemic, allowing school districts to provide full-time virtual education through the district

to students uncomfortable returning to in-person education. A June 2021 analysis of 5,606 students enrolled in full-time VE found that 5,077 students (91%) were new to VE in October 2020 compared to October 2019. VE is primarily delivered through technology and can be synchronous or asynchronous. Students must enroll by course, by semester. VE students can be identified in the WDE-684 report. **FNS determined that VE students are not eligible for P-EBT.**

- (2) Classroom-Based Virtual Education (CBVE) - CBVE did not exist before the COVID-19 pandemic. CBVE allowed schools to be responsive to individual student needs, including the need to quarantine, throughout the school year. Students could move between in-person learning and virtual learning while staying enrolled in the same course with the same classroom teacher, and instruction could be provided to offsite students synchronously or asynchronously. (Some districts, like Albany County #1, also used CBVE to create a virtual classroom for teachers and students who opted into virtual learning for a full semester). Unfortunately, students who participated in CBVE cannot be identified in the WDE-684 report. Including these students in P-EBT will require a student-level data collection, which DFS will pursue in Fall 2021 with technical assistance from WDE.
- (3) Remote Education (RE) - Like Virtual Education (VE), Remote Education (RE) existed in Wyoming before the COVID-19 pandemic after being passed by the state legislature in 2019. The key differences between VE and RE are:
 - (1) All learning must be synchronous (not asynchronous);
 - (2) RE courses are not subject to the approval process by WDE as VE courses; and
 - (3) The teacher must be teaching from a classroom with some students present. This includes when the teacher is in a classroom with some in-person students while other students participate via technology from another location. The off-site students' location could be their home or another classroom in the remote student's school district.

Note: Since RE has a statutory requirement for teachers to be in-person, RE did not work well for some pandemic-related situations where buildings were closed to teachers as well as students. This is the primary reason Wyoming created CBVE under emergency Chapter 41 rules in response to the pandemic.

Although some RE students may be eligible for P-EBT, information on RE students and their location of instruction (e.g. at home or in another classroom) is not available in the WDE-684. Furthermore, students' medium of instruction was coded as "face-to-face" due to students' receipt of synchronous instruction from a classroom teacher, so they are difficult to identify through existing data sources. DFS will seek to collect information from school districts to identify P-EBT eligible students in Fall 2021 with technical assistance from WDE.

Remote Education students continued to be enrolled in their NSLP School District and the school districts did not create a new non-NSLP participation.

- Describe the process that the State will use to update and re-establish each child's in-person and virtual schedules. How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

Wyoming plans to issue all P-EBT benefits for the 2020-2021 school year retroactively. In June 2021, WDE conducted an initial data pull of eligible students (from the WDE 684 report) from the October 2020 and March 2021 data collections. This information will serve as the basis for P-EBT issuance for the 2020-2021 school year.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

The Wyoming Department of Education (WDE) will be responsible for creating updated student enrollment files to identify students subject to school-wide virtual or hybrid education schedules during the 2020-2021 school year. WDE will also be responsible for distributing DFS' communication material about P-EBT to Schools and Districts.

The Wyoming Department of Family Services (DFS) is the state SNAP agency and will be responsible for issuing P-EBT benefits to eligible students and managing associated customer service responsibilities. DFS will also be responsible for requesting student-level information about Classroom-Based Virtual Education and Remote Education from school districts in Fall 2021.

- DFS contracted with Crocus, a third-party data services firm, to assist DFS and WDE in preparing student enrollment files for P-EBT issuance, including matching student files against Wyoming's existing SNAP caseload to determine whether P-EBT benefits should be issued to an existing SNAP EBT card or a new P-EBT specific card.
- DFS will also be supported by the state's existing EBT vendor, FIS, who will be responsible for issuing P-EBT benefits to existing SNAP EBT cards and mailing new P-EBT cards to families, where applicable.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that the State will take to address program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed] [Answers above.](#)

B. School Status

Standard for P-EBT Eligible School Status

Children are eligible for P-EBT benefits if they are eligible for free or reduced price meals, but are unable to receive those meals at school due to the operating status of their schools as outlined below:

The school is closed (including any delayed start or early closure to the school year), or the school is operating with reduced attendance or hours.

School closures do not include weekends, or days when the school is closed due to a holiday or regularly scheduled break (Thanksgiving, New Year's Day, Spring Break, etc.).

The period of closure or reduced attendance or hours must meet the current school year minimum 5 consecutive day threshold before any child is eligible for P-EBT benefits. Once the minimum 5 consecutive day threshold is met, children are eligible to receive P-EBT benefits for closures or reductions in hours and/or attendance due to COVID-19.

- Describe how the State will identify, confirm and monitor the status of individual schools. Also describe how the State will identify the period of duration of the closure, reduced hours, or reduced attendance of the State's schools.
- How will the State confirm that the child's school has been closed or is operating with reduced attendance or hours for a minimum of 5 consecutive days?
- Describe how this information will be obtained and how often the State will collect updated information from schools. (Note that this information must be updated no less frequently than every other month.)
- Describe the State's plan for monitoring changes in eligible school status between the State's bi-monthly (or more frequent) collection of updated school data. Describe how the State will use this updated school information to revise issuance amounts.
- Describe any simplifying assumptions the State proposes to use and the justification for using those simplifying assumptions. Please address both in detail. In addition, please describe any proposed measures that ensure program integrity when using the proposed simplifying assumptions.

Response: [please use as much space as needed]

WDE closely tracked school-based closures throughout the 2020-2021 school year. Based on data that was current as of 6/2/2021, WDE has identified 8 school districts that operated Tier 3 schedules (fully virtual) and/or Tier 2 schedules (defined by WDE as 2 days in person, 3 days remote - called "Hybrid" in this plan). In 4 of the 8 school districts, all-building closures were required by tribal stay-at-home orders. In all 8 school districts, WDE tracked precise closure and reopening dates, as well as any differences in learning modality by grade level. For example, in Albany County

#1, only Secondary Schools operated a Tier 2 (Hybrid) model, while Elementary Schools operated in-person.

Because all P-EBT benefits for the 2020-2021 School Year will be issued retroactively, WDE now has all necessary data to provide accurate P-EBT benefits to children affected by school or district-wide closures.

5. P-EBT for Children in Child Care

Standard for P-EBT Eligibility

A child enrolled in a covered child care facility is eligible for P-EBT if:

The child is a member of a household that received SNAP benefits at any time since October 1, 2020.

The child is enrolled in a covered child care facility. (Note that under the FFCRA, USDA deems all children under the age of 6 to be enrolled in a covered child care facility.)

During a public health emergency designation, the child's child care facility is closed or is operating with reduced attendance or hours for at least 5 consecutive days, resulting in the child's inability to attend the facility; or one or more schools in the area of the facility, or in the area of the child's residence, is closed or is operating with reduced attendance

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.

Wyoming had an average of 5,000 children under age 6 in SNAP households statewide between October 2020 and May 2021. Since the FFCRA deemed all children under the age of 6 to be enrolled in a covered child care facility, these 5,000 children are potentially eligible for P-EBT benefits.

- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant SNAP privacy requirements?

DFS is the state SNAP agency and will issue P-EBT benefits only to eligible children for the months (since October 1, 2020) they were enrolled in SNAP. This information will not be shared outside of DFS and their contracted data vendor to ensure SNAP privacy requirements.

- How will the State determine that a child's residence is in the area of one or more schools that is closed or is operating with reduced attendance or hours?
- For children whose residence is *not* in the area of one or more closed schools or schools operating with reduced attendance or hours, how will the State determine that child's eligibility? Specifically, how will the State determine that:
 - the child's child care facility is closed or is operating with reduced attendance or hours, or
 - the child's child care facility is in the area of one or more schools that are closed or operating with reduced attendance or hours?

- Are there any State or local public health ordinances that limit the capacity of child care facilities in response to COVID-19 in your State? If yes, describe how you will use those to find that all SNAP-participant children under age 6 are eligible for P-EBT in those areas?

The Wyoming Department of Health (WDH) issued guidelines on September 16, 2020, that directly resulted in “reduced attendance or hours” in child care centers. These guidelines impacted child care operations statewide. The guidance specifically says:

1.a. “While normal operations regarding class size can resume, smaller classes will ensure that fewer children are exposed if there is a confirmed COVID-19 case in the classroom.”

1.b. “The Wyoming Department of Health continues to recommend that children and staff in different classrooms do not mix or interact in order to reduce the numbers of children and staff exposed in the case of a COVID-19 case in the facility.”

The WDH’s guidance recommending reduced class sizes resulted in reduced attendance or hours in child care centers that followed the guidance. In addition, recommendations against combining classrooms or sharing staff across classrooms reduces staffing flexibility and results in limited hours of operation for programs. This guidance went into effect in September 2020 and will remain in effect for the entirety of Wyoming’s public health emergency.

DFS is also the State Agency responsible for inspection and licensing of child care programs and facilities. Since September 2020, the majority of child care facilities have reduced class room sizes and attendance. Child care subsidy data from each month of proposed P-EBT eligibility for children in child care (October 2020 through May 2021) shows that between 18% and 24% fewer low-income families received child care assistance compared with the same month in FY2019. These reductions were seen statewide as well as in every district (the local area that child care assistance data is reported). Child care expenditures are received per month, per child, based on a billing invoice submitted by providers. Implementation of these statewide public health orders, along with data confirming reduced participation by families in publicly-funded childcare, confirms all child care centers meet the minimum P-EBT eligibility requirements.

Therefore, Wyoming requests to certify all children under 6 who are members of a household that receive SNAP benefits as eligible for P-EBT.

- Describe the process that the State will use to update and re-establish each child’s continued P-EBT eligibility and benefit level consistent with changes in the operating status of the child care facility or area schools? How frequently will that information be updated? (Note that this information must be updated no less frequently than every other month.)

As the data pull will occur after the SNAP monthly issuances, DFS will ensure that a child’s eligibility for P-EBT benefits ends when a child’s SNAP enrollment ends. For example, if a child receives SNAP benefits for the months of October 2020 – March 2021, this child will only receive P-EBT benefits for those same months.

- Describe the roles and responsibilities of each State agency or other partners involved in P-EBT (e.g. which agency is responsible for confirming eligibility).

DFS is the State agency that determines SNAP eligibility and will use this data to determine potentially eligible children for child care P-EBT.

- What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

DFS will utilize simplifying assumptions to provide P-EBT benefits for children that were 5 years old on October 1, 2020, but have since turned 6 years old, through the end of the current school year, based on the assumption that the child remained in child care for the remainder of the school year. Wyoming will ensure that children eligible under the child care plan are not also receiving a P-EBT benefit through the school plan.

6. Benefit Levels

Standard for Benefit Levels

The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast, a lunch, and a snack for school year 2020-2021. The benefit is multiplied by the number of days that the eligible child’s status makes them eligible for P-EBT benefits.

SY 2020-2021 July 1, 2020 - June 30, 2021	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack (NEW)	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$0.96	\$6.82
Alaska	5.79	3.64	1.56	10.99
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	1.13	7.97

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>

- Describe the benefit levels proposed, including how days of eligibility will be determined. What simplifying assumptions does the State propose? Why must the State make those simplifying assumptions? Please address both of these questions in detail.

Response: [please use as much space as needed]

For school children in 6 school districts that are eligible for P-EBT due to extended school-based closures, Wyoming proposes to use a simplifying assumption to determine two monthly benefit levels: virtual and hybrid. To determine the number of days per month, Wyoming divided the total number of school days (175) by 9 months (August/September is a combined “Month 1”), followed by October (“Month 2”), November (“Month 3”), and so on, with May as “Month 9.” This results in an average of 19.5 school days per month.

The proposed hybrid benefit reflects Wyoming’s “Tier 2” (Hybrid) schedule, which was defined as 3 days remote and 2 days in person each week for the 6 districts reporting using Tier 2 schedules during the year. For example, the Albany #1 School District assigned all middle and high school students to a Tier 2 schedule, which was 3 days remote and 2 days in-person from the first day of school (August 26) through March 22. For these students, Wyoming is proposing to provide 7 months (Aug/September, October, November, December, January, February, March) of P-EBT benefits at the Hybrid level.

- The “Virtual” benefit level is calculated at $19.5 \text{ days/month} * \$6.82 = \$132.99$ (rounded to **\$133**)
- The “Hybrid” benefit level is calculated at $12 \text{ days/month} * \$6.82 = \$81.84$ (rounded to **\$82**)

For children in two school districts with time-limited closures of at least 5 consecutive days, Wyoming proposes to calculate the precise number of eligible days for each student. For example, in Laramie County #1, the school year was delayed by 5 days in August. Wyoming proposes to issue 5 days worth of P-EBT benefits ($5 * \$6.82 = \34.10 , rounded to \$34) to all F/RP eligible students in the district. The other school district in this situation is Hot Springs County #1 where schools shut down for 9 consecutive school days in November due to COVID-19. Wyoming proposes to issue 9 days worth of P-EBT benefits ($9 * \$6.82 = \61.38 , rounded to \$61) to all F/RP eligible students in the district.

For CBVE students, the benefit level will be set for each student individually, based on the number of virtual days the student attended each month.

For the Child Care population, Wyoming proposes to issue a benefit in each month from October through May equal to the statewide average P-EBT benefit issued to school children who received a P-EBT benefit in the same month.

The only exception is in Fremont County where a tribal stay-at-home order was in place through February 8, 2021. Wyoming proposes to issue the Virtual benefit level (\$133) to the

Child Care population (approximately 220 children) in Fremont County for the months of October, November, December, and January.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2020-2021 with estimated dates for major milestones in your plan.

- States should develop their timeline cooperatively, including input from its EBT processor and all State agencies involved in implementing P-EBT. Instead of using specific dates, describe important milestones and realistic durations between them. USDA suggests that States build their timelines from the date USDA approves the State's plan (Day #0).

Wyoming has worked closely with its EBT vendor (FIS), along with its data vendor (Crocus) and WDE to develop the proposed implementation schedule. FIS has confirmed that sufficient card stock is available to meet Wyoming's anticipated demand for approximately 5,720 P-EBT cards for children in non-SNAP households.

- The timeline must include the State's tentative issuance dates. In SY 2019-2020, most States issued in phases, and on a rolling basis thereafter. For example: issuance to SNAP households Day #10, to non-SNAP households on Day #15, and to newly identified cases from Day #16 onward. This is a best practice, which we encourage States to continue.
- Examples of other possible milestones include, but are not limited to:
 - State Education agency provides student data to SNAP State agency (Day #5)
 - P-EBT hotline becomes active (Day #9)
 - Public notice campaign begins (Day #10), etc.

Tentative Implementation Timeline

- FNS Plan Approval: Day #0
- WDE provides student data to DFS from WDE-684: Day #15
- DFS analyzes and de-duplicates student data and child care data; Prepares final data file for EBT processor: Day #30
- First P-EBT file arrives at EBT processor: Day #31
- Benefits loaded to existing SNAP cards: Day #31
- New P-EBT cards mailed to non-SNAP households: Day #32
- Cards arrive for non-SNAP households: Approximately 7-10 days after mailing (e.g. Day #39-42)

Please also address each of the following:

- Will the State issue P-EBT benefits on a unique P-EBT card design? If so, who will receive these cards, non-SNAP households only? Or also SNAP households?

Wyoming will issue P-EBT on a white P-EBT card unless the family is a current SNAP recipient, then it will be added to their existing SNAP card.

- How will the State distinguish P-EBT from SNAP and D-SNAP issuances? USDA strongly encourages the use of a sub-benefit type, even if your State did not do so in SY 2019-2020. This will greatly facilitate the States' ability to report and USDA to maintain accountability for P-EBT.

Wyoming's regular SNAP benefits are issued with a type of "FS" with no subtype. For P-EBT and D-SNAP, a unique subtype is added. P-EBT's subtype code is "SL" and D-SNAP is "ND".

- What will be your draw/spend priority for P-EBT, SNAP, and D-SNAP? USDA suggests making P-EBT first on your draw/spend priority.

Wyoming's draw/spend authority is P-EBT, D-SNAP, then SNAP.

- How will the State handle expungement of P-EBT benefits? USDA recommends that States follow the same expungement rules that the State currently follows for SNAP.

Wyoming will follow the same expungement rules that are currently followed for SNAP with the exemption of sending notices. Families will be notified of the expungement rules in the information provided with the card mailer. The current expungement is 365 days, but beginning June 2021, the expungement will change to 274 days due to the Farm Bill requirements.

- During SY 2019-2020, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases? Will you issue *new* P-EBT cards to existing P-EBT households?
- If so, who will receive these cards? Non-SNAP households only? Or also SNAP households?
 - If not, how will you handle cases where the P-EBT household no longer has their P-EBT card?

Wyoming will access an undeliverable report for returned cards. These will be monitored regularly for ways that the State can resend cards. FIS disposes of any returned card, so when we find an up-to-date address for a family, a new card will be resent. Wyoming plans to send new P-EBT cards to all non-SNAP households, since previous P-EBT recipients were not instructed to keep their original cards.

8. Customer Service

Recommended Standard for Household Support

USDA strongly encourages States to develop a customer service plan that anticipates common questions from households of children that are eligible and potentially eligible to participate in P-EBT, and that ensures that all who are eligible are able to receive and use their P-EBT benefits.

USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.

USDA strongly encourages States to provide relevant program information to actual and potential P-EBT households.

- How will the State resolve disputes or issuance errors (incorrect benefit amount, denied benefits, etc.)? Based on the large number of such inquiries received by USDA, the States, and EBT processors, USDA suggests a phone number (hotline) staffed by personnel empowered to research and address such cases.

Under the proposed plan, Wyoming will only directly issue P-EBT benefits to students affected by school or district-wide closures. This is a discrete group of students during the 2020-2021 school year, so Wyoming expects that case-specific inquiries from families of students not impacted by closures will be fairly minimal.

To serve families who believe they should have been issued a P-EBT benefit for the 2020-2021 school year, or issued a different P-EBT amount, Wyoming will use a dedicated number for a P-EBT hotline (307-777-6082), manned by state employees who have access to the EBT system and can assist with student-specific concerns.

- Please describe how the State will serve groups with potential access problems, for example: homeless children, foster children, children without social security numbers, children with limited English proficiency, households without internet access, and people living with disabilities.

Wyoming is pursuing a direct issuance strategy for P-EBT during the 2020-2021 school year because it reduces the burden on eligible families to apply, therefore increasing access. Wyoming will also do the following to ensure directly issued P-EBT benefits reach families with potential access barriers:

- Create a P-EBT hotline for families without internet access who cannot access information via DFS' website
- Utilize Language Line as a translation service for callers to the P-EBT hotline with limited English proficiency

- Publicize that families who have moved or are unstably housed can call the P-EBT hotline to report a new mailing address and/or identify a local SNAP office or community-based organization where their P-EBT card can be mailed.
 - Partner with community-based organizations to help explain P-EBT to eligible families and address any access barriers that may arise
 - Work directly with school leadership in Wyoming’s tribal schools to ensure P-EBT cards reach eligible children who do not have a U.S. postal service address.
- Describe the State’s public information campaign. That is, the information you will provide to the general public (i.e., *not directly* to P-EBT participants), and how you will provide that information (i.e., print or broadcast advertising, social media, mailers to the general population).

Wyoming will post information about P-EBT on the DFS website and Facebook page. This will include information to clarify school benefit versus the child care benefit (and eventually, the Summer P-EBT benefit) as well as general information. The Wyoming Afterschool Alliance, a community partner, will also support the State to help publicize P-EBT information.

- Describe what information you will provide for households that do not want the P-EBT benefit that is directly issued to them. How to dispose of the card, etc.

Families will be notified as part of the P-EBT card mailing how to dispose of the benefits if they do not wish to use them. Families can also decline P-EBT benefits by contacting the P-EBT hotline and the staff will walk them through how to properly dispose of their card.

- Describe the information you will provide *directly* to P-EBT participants (this is different than the information you provide to the general public), and how you will provide that information. For example:
 - What will you provide to explain the purpose of P-EBT and how to use the benefit? Based on the large number and wide variety of public inquiries that USDA, States, and EBT processor call centers received regarding P-EBT in Spring and Summer of 2020, USDA recommends it include:
 - A description of P-EBT
 - Instructions for PINing a P-EBT card
 - Explanation of where benefits can be used
 - Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
 - Explanation of violations and penalties, such as trafficking
 - An indication that benefits are non-transferable
 - Instructions for destroying the card, if they want to decline benefits
 - Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

- How will you provide P-EBT information to non-SNAP households? How will you provide P-EBT information to SNAP households?
 - Will you provide information via mailers? Will the mailer(s) be a flyer/brochure, buck slip, letter, or some other alternative? USDA recommends flyers/brochures, because these can be used more flexibly than buck slips.
 - Will you provide information via e-mail, text messages, social media, website, robo-call, and/or other electronic means?

Response: [please use as much space as needed]

For SNAP and non-SNAP families that are directly issued P-EBT benefits, a mailer will be sent out including the following information:

- A description of P-EBT
- Instructions for PINing a P-EBT card
- Explanation of where benefits can be used
- Explanation of how benefits can and cannot be used (i.e., eligible foods and non-eligible items)
- Explanation of violations and penalties, such as trafficking
- An indication that benefits are non-transferable
- Instructions for destroying the card, if they want to decline benefits
- Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (setting up a PIN, for example)

9. Over-issuance of P-EBT benefits

States should outline a process to recover or adjust P-EBT payments to correct errors on previous issuances. States cannot simply apply their existing SNAP benefit claim process to P-EBT. Accordingly, States should develop P-EBT-specific rules and procedures and include those in their State plans. States must also consider the capability of their SNAP systems to distinguish P-EBT from SNAP benefits.

The process should take into consideration that many households received their benefits, without application, through an automated match process that relied on the State's own administrative data. Reclaiming benefits under those circumstances calls for a process that weighs the equity of the claim, the burden on affected households, and the likelihood and costs of recovery. Given those considerations, a State's P-EBT plan should consider reasonable thresholds for taking action to recover over-issued benefits. States that establish a process for benefit recovery must provide clear notice to beneficiaries of the circumstances under which the State may attempt to recover benefits or reduce a future issuance. Under no circumstances may the State reduce a SNAP benefit to settle a P-EBT claim.

Finally, the States recognize that USDA is responsible for ensuring accountability of funds for P-EBT purposes. As part of its oversight responsibilities, USDA may hold State agencies liable for aggregate over-issuances or improper payments. USDA's course of action is to pursue P-EBT

over-issuance claims in the aggregate where USDA believes such action is merited, based on the nature of the error that gave rise to the over-issuance, the size of the error, and whether such action would advance program purposes.

Response: [please use as much space as needed]

As a general rule, Wyoming will not pursue claims against minors, as the P-EBT cards are issued directly to eligible children. Wyoming will mitigate over-issuances by using a direct issuance strategy, retroactively issuing benefits for the 2020- 2021 school year, and ensuring deduplication so no child receives more than one (1) P-EBT benefit in a month. Any P-EBT issuances identified as incorrect will be rectified by not issuing additional P-EBT benefits. DFS will work with FNS regarding procedures for overpayments related to suspected fraud should any be reported or identified through the P-EBT hotline.

10. Benefit Issuance Reporting

The State agrees to complete the FNS-292 form as well as all other normally recurring SNAP reporting, including the FNS 46, 388, and 778 reports, on a timely basis in accordance with requirements.

11. Administrative Funding

A separate grant to cover State level administrative costs associated with the administration of P-EBT will be awarded to the SNAP State Agency within each State, for the period of performance October 1, 2020 through September 30 2021. As the authorized grantee, the SNAP State Agency will be granted access to the associated letter-of-credit in which the administrative grant funds will be placed. As P-EBT related State administrative costs may be incurred by State agencies other than the SNAP State Agency, the SNAP State Agency will be responsible for entering into interagency agreements in the form of a Memorandum of Understanding, or document of similar construct, with all other respective State agencies responsible for delivering P-EBT benefits. The SNAP State Agency will be responsible for reimbursing the administrative costs of all associated agencies accordingly.

Prior to USDA releasing the grant for administrative funding, each SNAP State Agency will be required to submit a P-EBT Budget Plan using the FNS-366(a) Program and Budget Summary Statement. Funds will not be released to the SNAP State Agency's letter-of-credit until this plan is submitted and approved. The SNAP State Agency's Budget Plan should include the estimated administrative costs for all State agencies that will be handling P-EBT.

As noted in Item 9 above, the SNAP State Agency will be also responsible for reporting all administrative expenditures on a separate FNS-778, Supplemental Nutrition Assistance Program, Federal Financial Report designated specifically for P-EBT. The expenditures on the FNS-778 should align with those outlined in the FNS-366(a), Program and Budget Summary Statement. The forms associated with P-EBT will be modified accordingly.

12. Release of Information

Per Section 1101(e) of the Families First Coronavirus Response Act: 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.”

13. 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.

14. Administration of State P-EBT Plan

The State will administer P-EBT according to the terms of its approved State plan. 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.

Signature and Title of Requesting SNAP and Child Nutrition State Agency Officials:

Korin A. Schmidt
Director, Wyoming Department of Family Services

Dicky Shanor
Chief of Staff, Wyoming Department of Education

Date of Request: _____