



Food and Nutrition
Service

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December 12, 2022

SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Wisconsin'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 Wisconsin's enclosed plan to operate P-EBT for children in schools and child care.

Summary of State's Plan

The Wisconsin Department of Health Services, the Wisconsin Department of Public Instruction, and the Wisconsin Department of Children and Families 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 August 2022 through June 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, Wisconsin 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,
- instruct SFAs to enter each student's P-EBT eligible days and current household contact information into the state's P-EBT data portal ahead of each of the state's planned four benefit issuances:
 - SFAs that are tracking COVID-related absences and virtual learning days will report the actual count of those P-EBT-eligible days for each student,
 - SFAs that are not tracking COVID-related absences and virtual learning days will report any excused absence of 5 or more consecutive days as a P-EBT-eligible day,
 - for households of children in SFAs using the 5 consecutive day threshold as a proxy for a COVID-related absence, the household may make a claim with the state (by contacting the P-EBT Support Team through the state's customer service hotline or website) for any COVID-related absence that is less than 5 consecutive days,
 - the household will attest that the absence days are COVID-related and the state will verify with the SFA that the absence was excused prior to issuing benefits for those days,
 - if the SFA does not enter a mailing address for the student, and a mailing address is not available from the state's SNAP database or other state sources, the household must contact the state's P-EBT Support Team to provide that information before the state will issue an EBT card,
- compare the list of students entered into the Portal to a current list of directly certified students in the state; the state will contact the SFA if it is clear that the SFA has not updated its list of children eligible for free meals through direct certification,

(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 consist of a school year 2022-2023 free and reduced price meal application, documentation to support the

application's income sources, and a set of supplementary questions to confirm the remaining eligibility criteria:

- all applicants will attest that their children attend a non-NSLP virtual school or are homeschooled due to concerns about COVID:
 - for homeschooled children only, applicants will also document that they submitted their required Homeschool Enrollment Report (HOMER) form to the Wisconsin Department of Instruction,
- applicants (other than those noted in the next bullet) will provide the name of their children's previous NSLP-participating school; the state will confirm that the child was enrolled in the school at some point since the start of the pandemic,
- for the subset of children who entered school since the start of the pandemic, and have always been homeschooled or always attended a fully virtual school, the state will either confirm that the child is registered as a homeschooled student or will contact the child's virtual school to confirm the child's enrollment,
- the state will use the income documentation provided by applicants to verify their income eligibility as follows:
 - the state will confirm that the documentation matches the income entered on the application for **at least** the first 100 applications received,
 - if the error rate on the first 100 applications is below 5 percent, the state **may** elect to verify 10 percent of remaining applications; if the error rate is higher, the state will continue to verify all applications:
 - despite the USDA-approved option to review a sample of applications if the error rate is low, Wisconsin will likely verify all applications,
- the application will require parents to promptly notify the state if their children return to an in-person school during the school year,

(for all P-EBT-eligible school children)

- issue benefits for the months of August through October in January,
- issue benefits for the months of November through January in March,
- issue benefits for the months of February and March in May,
- issue benefits for the months of April through June in July.

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, Wisconsin has or will:

- identify SNAP-enrolled children under age 6,
- 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 Wisconsin experienced a reduction in child care access:
 - use the reduction in claims for September and October 2022 compared to September and October 2019 to calculate and issue benefits for September 2022 through January 2023,
 - use the reduction in claims for February and March 2023 compared to the sum of claims for February 2020 and March 2019 to calculate and issue benefits for February through June 2023,
 - multiply the reduction in claims by the average monthly number of instructional days for school children (18 days), and by \$8.18, to determine the average monthly benefit:
 - 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,
- 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 April 2023,
- tentatively issue benefits for the months of February through June in June 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.

- Wisconsin estimates that it will issue \$75.3 million to approximately 80,000 school children for school closures and reductions in attendance and hours extending from August 2022 through June 2023.
- Wisconsin estimates that it will issue \$35.0 million to approximately 95,000 SNAP-enrolled children in child care from September 2022 through June 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 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 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 Wisconsin Department of Children and Families 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 Children and Families will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS values Wisconsin'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