

**State Plan for Pandemic EBT Children in
School and Child Care, 2021-2022**

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Summary:	(1) This document is a template to assist States in the development of State plans to operate Pandemic EBT for children in schools or child care during school year (SY) 2021-2022. (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), the Consolidated Appropriations Act, 2021 (P.L. 116-260), and the American Rescue Plan Act of 2021 (P.L. 117-2).

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 is covered under OMB Control # 0584-0660, Pandemic EBT (Schools) which expires on August 31, 2021. The collection covers the burden associated with States submitting school year plans and the submission of the FNS-366a and SF-425 reporting forms. FNS has submitted a renewal request for OMB # 0584-0660, Pandemic EBT (Schools) which accounts for the information collection burden associated with the increased complexity of determining benefit levels under the Schools portion of P-EBT, administrative cost grants, and submitting plans for the Child Care and Summer portions of P-EBT which are not currently approved under OMB #0584-0660

State Plan for Pandemic EBT
Children in School and Child Care, 2021-2022

1. State [Wyoming](#)

2. Primary Citations: Families First Coronavirus Response Act (FFCRA); Continuing Appropriations Act, 2021 and Other Extensions Act; Consolidated Appropriations Act, 2021; American Rescue Plan Act of 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.](#)

- a. The *date range* covered by this State plan or amendment
 - for children in school - [September 1, 2021 – May 31 2022](#)
 - for children in child care - [September 1, 2021 – May 31, 2022](#)

- 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

- 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

- [Out of the 33,364 school-age children eligible for free or reduced-price lunch \(FRL\) who received P-EBT benefits for Summer 2021, Wyoming estimates that approximately 30% \(10,000 students\) who continue to be enrolled in schools that traditionally participate in the National School Lunch Program \(NSLP\) will qualify for P-EBT benefits at some point during the 2021-2022 school year based on unanticipated, COVID-related quarantines and temporary virtual learning days.](#)

- If 10,000 FRL students qualify for an average of 20 days of P-EBT benefits, the total value of P-EBT benefits during the 2021-2022 school year would be \$1.42 million.
- From previous rounds of P-EBT, Wyoming estimates that 30% of P-EBT benefits will go to children in SNAP households and 70% of P-EBT benefits will go to children in non-SNAP households.

¹The date range covered by P-EBT State plan or amendment. A State’s plan will typically cover the instructional months in the State’s school year (September 2021 through June 2022, for example).

- d. 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

Response:

Once Wyoming’s SY21-22 plan is approved by USDA, the Wyoming Department of Family Services (DFS) and Wyoming Department of Education (WDE) will release a joint memo to school districts and private schools requesting data for P-EBT eligible students with instructions on how to securely submit that data to DFS. Districts and schools will have 30 days for their initial submission, with an estimated 15-day grace period for follow up with non-responsive districts and schools. Once all data is received, an additional 30-45 days is needed for analyzing data and identifying missing addresses. **Wyoming anticipates issuing a first round of P-EBT benefits for SY21-22 to school age children within 90 days of federal approval.** Wyoming expects to initiate a second and final data collection from districts and schools in May 2022 and issue additional P-EBT benefits by August 2022.

4. P-EBT for School Children (see Q&As #6-24)

A. Eligible Children



- 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 2020-2021 graduates and other non-students. *(Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.)*

The Wyoming Department of Education (WDE) has access to student enrollment files that includes all information on eligibility for FRL 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 and 2020-21 school year. Wyoming will only include FRL-eligible students who were enrolled during the 2021-2022 school year in schools that currently participate in the NSLP (or the Seamless Summer Option under FNS waiver authority). Students who graduated after the 2020-2021 school year, disenrolled in school, or were enrolled in an ineligible school during the 2021-2022 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 meals²? 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 2021-2022 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 FRL. 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 FRL eligibility determination during the 2021-2022 school year, current year eligibility will be used. For students who did not receive a new FRL eligibility determination during the 2021-2022 school year because the school was utilizing COVID-related waivers to serve meals to all students and did not proactively collect new FRL applications, the student's FRL eligibility determination from the most recent year that applications were collected (either SY 2020-2021 or SY 2019-2020) will be used.

In Wyoming, there are seven (7) private schools that participate in the NSLP that are not included in the WDE-684 data collection. As in previous rounds of P-EBT, DFS and WDE will reach out to these schools to identify FRL students who may be eligible for P-EBT.

²The burden associated with National School Lunch Program applications is covered under OMB Control # 0584-0026, 7 CFR Part 245 - *Determining Eligibility for Free & Reduced Price Meals and Free Milk in Schools*, expiration date 7/31/23.

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

For SY20-21, Wyoming is currently working through a process of collecting student-level information from individual school districts on which children missed meals due to Classroom-Based Virtual Education (CBVE) due to COVID-19 illness/exposure or parent choice. This data collection process has been lengthy because it had to be tailored for each district and private school, as standardized temporary remote learning data was not available. By contrast, during SY21-22, districts generally *have* collected information about students who are temporarily absent or participating remotely due to COVID-19 related illness or exposure.

Once Wyoming's SY21-22 plan is approved by USDA, DFS and WDE will release a joint memo to school districts and private schools requesting data for P-EBT eligible students with instructions on how to submit that data through the Wyoming Transcript Center. Districts and schools will have approximately 30 days for their initial submission, with an estimated 15-day grace period for follow up with non-responsive districts and schools. Student-level data from districts and schools will be securely transferred to DFS for P-EBT benefits issuance.

- 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 intends to issue all P-EBT benefits for the 2021-2022 school year retroactively based on student-level information submitted by districts and schools. Because Wyoming is not issuing P-EBT benefits prospectively, the updating and re-establishment of schedules will not be necessary.

- 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).

Wyoming's P-EBT program is a partnership between DFS, the state's Supplemental Nutrition Assistance Program (SNAP) agency, and WDE.

During SY21-22, DFS will be responsible for directly requesting student-level information on P-EBT eligibility from school districts and private schools that participate in the NSLP, with technical assistance from WDE. DFS is also responsible for issuing P-EBT benefits to eligible students and managing associated customer service responsibilities.

During SY21-22, WDE will be responsible for advising and supporting DFS' communication with NSLP-participating school districts and private schools, as well

as securely receiving data submitted by individual districts and schools through the Wyoming Transcript Center (or another secure data transfer process). WDE will also provide data to verify FRL eligibility for all submitted students and help identify missing addresses, when possible.

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, Fidelity Information Services (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.

Wyoming is not proposing any simplifying assumptions for student eligibility

Response: [please use as much space as needed]

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.

At the time of plan submission, DFS and WDE are not aware of any school-wide closures in the state of at least five (5) consecutive days that would trigger school-wide issuance of P-EBT benefits. However, Wyoming will consider any school with one (1) or more students missing at least five (5) consecutive days of

school due to COVID-19 related illness or exposure to meet the criteria of “reduced attendance.”

- 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?

As described above, all information on student absences or remote learning due to COVID-19 will be reported directly from districts and schools in response to a DFS request in 2022. Any school reporting P-EBT eligible students will be considered as operating with reduced attendance.

- 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.)

DFS expects to complete one (1) data request during SY21-22 which will occur shortly after FNS approves Wyoming’s submitted plan. Since all P-EBT benefits will be issued to students retroactively, DFS will not need to do any additional reassessment of school eligibility.

- 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.

Since all schools in the state are operating in-person during the current school year, Wyoming is expecting to issue P-EBT benefits based on student absences or remote-learning days due to COVID-19, rather than school-wide closures. However, should WDE and DFS become aware of school-wide closures or hybrid learning of 5 days or more in response to COVID-19, Wyoming will notify FNS of the state’s intention to issue P-EBT benefits to eligible students in these schools.

- 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.

Wyoming is not proposing any simplifying assumptions related to school-based eligibility for P-EBT.

- Please review P-EBT Q&As #16-19 on P-EBT eligible and P-EBT ineligible virtual learning models.

Per FNS’ guidance during SY20-21, Wyoming will not include students who participate full-time in one (1) of Wyoming’s statewide or district-wide Virtual Education (VE) programs.

5. P-EBT for Children in Child Care (see Q&As #25-33)

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 is enrolled in SNAP in the benefit month.
- 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 or hours.

- Describe how the State will identify eligible children and confirm their eligibility consistent with the above standard.
- How will the State determine and confirm the child's receipt of SNAP benefits in accordance with relevant 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? (See Q&A #29)
- 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?
- 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.)
- Describe how the State will set benefit levels for children once they have been determined eligible for some level of benefit? (See Q&A #29.)
- 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).
- 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]

Wyoming will utilize the Child Care State Plan format previously provided by FNS to submit a Child Care 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 2021-2022. The benefit is multiplied by the number of days that the eligible child's status makes them eligible for P-EBT benefits.

SY 2021-2022 July 1, 2021 - June 30, 2022	Free Reimbursements USDA School Meal Programs			
	Lunch	Breakfast	Snack	Daily Total
Contiguous U.S.	\$3.75	\$2.35	\$1.00	\$7.10
Alaska	6.03	3.78	1.63	11.44
Hawaii, Guam, Virgin Islands, Puerto Rico	4.37	2.74	1.17	8.28

Notes:

- 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.
 - Breakfast rates are those received by "severe need" schools.
 - Snack rates are those for afterschool snacks served in afterschool care programs
- Source: <https://www.govinfo.gov/content/pkg/FR-2021-07-16/pdf/2021-15107.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]

During SY21-22, Wyoming proposes to issue P-EBT benefits at a rate of \$7.10 for each missed day of in-person school due to COVID-19.

For districts and schools that are tracking COVID-related absences, children will receive benefits based on their number of COVID-absences.

DFS has worked extensively with all the school districts for the 2020/2021 school year. During the conversations, DFS surveyed the schools and spoke with all districts to get a feel for what was possible for the 2021/2022 school year. During those calls, districts

were confident in the ability to track COVID-related absences. Therefore, DFS is basing the assumptions on what the school districts said. Data that has been submitted for SY20-21 confirms the assumption the majority of districts are able to track absences due to COVID and districts have confirmed their ability to track this data is more reliable and consistent for SY21-22. DFS is also working in tandem with WDE to ensure that the data collection process runs smoothly. There is an existing process for this and it is working for the prior years.

For districts and schools that are not tracking COVID-related absences, any children with excused absences of five (5) consecutive days or more will receive benefits equal to the number of consecutive absences.

For eligible children with absences less than five (5) consecutive days, they will receive benefits equal to the number of days that are attested to on their application as COVID-related and can be confirmed using the verification the household will provide from the school.

For districts and schools that can identify children who were absent or quarantined for a COVID-related reason, but cannot provide the length of the COVID-related absence or quarantine, Wyoming will issue a benefit equal to the average benefit issued to students in schools that have provided the length of children's COVID-related absences. The average benefit will be calculated per month. The average benefit will not include children with fully virtual schedules.

If the school district submits absence data that aligns with the timeframe the parent is reporting, then that will suffice as confirmation and the student will be issued benefits for the days reported by the family.

7. Implementation Timeline, EBT Processing, and Benefit Issuance

Please provide an implementation timeline for SY 2021-2022 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 5,000 P-EBT cards for children in non-SNAP households.

- The timeline must include the State's tentative issuance dates. In SY 2020-2021, 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
 - DFS releases data request joint memo to districts/schools for P-EBT purposes: Day #5
- Districts/schools submit student data through the Wyoming Transcript Center: Day #35-50
- WDE provides student data to DFS: Day #51
- DFS analyzes student data and requests missing addresses from WDE: Day #72
- WDE provides additional data to DFS: Day #82
- DFS prepares final data files for EBT processor: Day #90
 - Benefits loaded to existing SNAP or P-EBT cards: Day #91
 - New P-EBT cards mailed to non-SNAP households: Day #92-95

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?

If the family is a current SNAP recipient, P-EBT benefits will be added to their existing SNAP card. Non-SNAP children who previously received P-EBT benefits in the SY20-21 school year/summer, will receive SY21-22 benefits on the same white P-EBT card. Children who have not received P-EBT benefits in the past will receive a new P-EBT card in the mail.

- 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 2020-2021. 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 274 days due to the Farm Bill requirements.

- During SY 2020-2021, 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?

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 any non-SNAP household who didn't already receive a new P-EBT card in 2021 (i.e. those who never received a P-EBT card or only received a P-EBT card in 2020).

- 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?

See response above. New P-EBT cards will only be issued to children who are not enrolled in SNAP and did not receive a P-EBT card from the SY20-21 or Summer 2021 P-EBT issuances. Wyoming will inform all P-EBT households through a mailed postcard of how to request a new card through FIS if they no longer have their SNAP or P-EBT card. This information is also available on DFS' P-EBT website and is regularly communicated to callers to DFS' P-EBT Hotline.

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 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.

To serve families who believe they should have been issued a P-EBT benefit for the 2021- 2022 school year, or issued a different P-EBT amount, Wyoming will use a dedicated number for a P-EBT hotline (307-777-6082), staffed by state employees or approved temporary staff 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 and caregivers 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 2021-2022 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:

- o Continue to operate a P-EBT hotline for families without internet access who cannot access information via DFS' website;
- o Utilize Language Line as a translation service for callers to the P-EBT hotline with limited English proficiency;
- o 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; o Partner with a community-based organization (Wyoming Afterschool Alliance) to help explain P-EBT to eligible families and address any access barriers that may arise; and
- o 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 benefit amounts for SY 20-21, Summer 2021, and SY21-22, 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 over the past year, 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; and • Information regarding a hotline, helpdesk, or website/portal that participants can reach out to, if they have questions, need assistance (i.e. setting up a PIN).

DFS commits to utilizing the hotline for parents to apply for P-EBT if they feel the direct issuance missed their child. The employee(s) assigned to the hotline will read the parent attestation to the parent over the phone and document that the parent says “yes” to the attestation. This documentation will consist of a shared tracking sheet through Google Sheets. This Google Sheet will also be used to communicate with and obtain confirmation from the school district of enrollment that the student had a confirmed excused absence during the timeframe reported by the parent prior to the issuance of benefits.

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.

Please describe how your State will manage P-EBT payment errors.

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 contact USDA whenever it identifies an issuance error and will provide a description of the error, the number of children involved, and the value of the over-issuance before the state issues a corrected benefit to a different household and before the state attempts to reclaim benefits from anyone.

Wyoming will mitigate over-issuances by using a direct issuance strategy, retroactively issuing benefits for the 2021- 2022 school year, and ensuring de-duplication 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, 2021 through September 30 2022. 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 by not discriminating on the ground of race, color, or national origin, by providing meaningful access to its programs and activities for individuals who are limited English proficient, and by providing equal access to individuals with disabilities.

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

Chad Auer
Deputy Superintendent, Wyoming Department of Education

Date of Request _____