

The U.S. Department of Agriculture (USDA) approved Wyoming's Pandemic Electronic Benefit Transfer program (P-EBT) plan on May 16, 2020. The state quickly began the process to provide nearly \$10 million in P-EBT benefits to approximately 33,000 eligible students. Because of data limitations within the state, Wyoming required all eligible families to apply for and be approved manually to receive the benefit. Unfortunately, response rates on applications were much lower than expected, and the labor required to process the applications was extensive. To better reach the families in Wyoming and to ease the state's administrative burden, Wyoming revised its plan to eliminate the application and directly issue P-EBT benefits to the families who had not already received them. This change allowed more families to be able to access the P-EBT benefits that they needed. Wyoming's experience provides insight into the rewards of directly issuing the benefits instead of requiring applications and how a state could move from an application process to direct issuance.

P-EBT Basics

P-EBT was created by the Families First Coronavirus Response Act (FFCRA) in March 2020 to provide families with an EBT card to purchase food as a result of losing access to free or reduced-price school meals when schools closed in the spring due to the COVID-19 pandemic.

To participate in P-EBT, states had to submit a plan to be approved by USDA. That plan included the number of potentially eligible children in the state, the total cost of the program in the state, as well as the method for identifying and validating qualified students.

Each state implemented P-EBT differently. Since states' plans were not submitted or approved at the same time, some states were able to distribute benefits earlier than others. The deadline for states to issue benefits was initially September 30, 2020, through FFCRA, but, in the Continuing Resolution that was passed in September 2020, Congress extended P-EBT for an additional year and made some improvements to increase the program's reach and to ease some of the administrative burdens.

Wyoming Application

Wyoming's Department of Family Services (DFS) began the discussion of P-EBT implementation internally by discussing their interest in directly issuing benefits to families. However, it quickly became clear to DFS that they did not have access to a statewide database for families on the Supplemental Nutrition Assistance Program (SNAP) and also for those children who were certified for free or reduced-price school meals. They also would have to rely on an incredibly old system with a limited staff to do direct issuance. Because of these obstacles, DFS decided to issue P-EBT benefits based on an application system. Wyoming was one of only two states that required an application for all families, including SNAP households. Twenty-seven states directly issued benefits to both SNAP and non-SNAP families.¹ Other states directly issued benefits to SNAP households, as well as additional children, such as those participating in Medicaid or who are homeless, and had the remaining eligible families complete an application.

Once Wyoming's application opened in late May, DFS worked hard to push out the message that families

¹ Center on Budget and Policy Priorities and Food Research & Action Center. (2020). *Lessons from Early Implementation of Pandemic-EBT*. Available at <https://frac.org/wp-content/uploads/FCLessonsLearned.pdf>. Accessed on October 23, 2020.

should apply and how to apply. One of the first major hurdles Wyoming faced was that once applications were submitted, the information had to be verified and matched to known students by the Wyoming Department of Education (WDE). This became a problem when DFS was informed that staff from WDE could only assist with verifying eligibility until June 3, 2020. This created a very short two-week window to get applications returned and verified.

Verification itself was a long and challenging process that required state agency staff to verify that each application was for a child who was certified for free or reduced-price school meals from a large enrollment file of all students in the state. Once the children were determined eligible, staff had to determine if the family already participated in SNAP, add benefits to their SNAP EBT card; or issue a new P-EBT card.

At the end of the application period, only a small fraction of the eligible children received P-EBT benefits — just over 5,000 of the approximate 33,000 children eligible. DHS and WDE staff were disappointed with the reach of the program, particularly given how hard they had worked to implement the new program and the long hours the team had put into implementing it.

Direct Issuance

After the deadline to apply had passed, the state agencies began discussing if there might be a way to reach more eligible families, but DFS had technical and systematic limitations, as well as limited staff time to support running an application process again. It was then that DFS was connected with UPD Consulting, a consulting firm that was able to provide disbursement assistance to address the immediate needs of the state agency, while creating a durable tool to use in future efforts, with support by the

Schusterman Family Foundation. UPD, with files from DFS and WDE, had the technological capability to collect the necessary data and verify student information in order to directly issue benefits to families who were eligible but hadn't been reached through the application process.

UPD's analysis identified an additional 25,000 eligible students. The state worked with partners, Wyoming Community Foundation and the Wyoming Afterschool Alliance, to send a postcard to these eligible households explaining what P-EBT was and why the family would be receiving the benefit. This critical step was taken because DFS was worried that families would think that the P-EBT cards were a scam and would not use the benefit out of fear. UPD's collaboration with the state set up a durable, self-sustainable procedure, outside of its legacy SNAP system to maintain future P-EBT fulfillment.

DFS created a P-EBT webpage for families who needed information on frequently asked questions, and provided a state contact who could help with additional questions. DFS worked with WDE to share information about P-EBT with all school districts so they could respond to basic inquiries about P-EBT.

Conclusion

Wyoming found its P-EBT success when it moved from an application process to issue P-EBT benefits to direct issuance. Once the state was able to eliminate the burden of seeking eligible families, in addition to asking them to apply for P-EBT, the state was able to reach phenomenally more students. By identifying and verifying students without needing direct input from the state agencies, Wyoming increased its issuance to eligible students by around 600 percent. Their experience can provide a path for other states that are using an application to distribute P-EBT when direct issuance would be a better system.