

**State Plan for Pandemic EBT: Children in School
School Year 2020-2021**

Issuing Agency/Office:	FNS / Child Nutrition Programs, Supplemental Nutrition Assistance Program
Title of Document:	State Plan for Pandemic EBT: Children in School, School Year 2020-2021
Document ID:	
Z-RIN:	
Date of Issuance:	November 16, 2020
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. (2) This document relates to Section 4601 of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159).
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>

State Plan for Pandemic EBT: Children in School
School Year 2020-2021

1. **State:** Wisconsin
2. **Primary Citations:** Families First Coronavirus Response Act;
Continuing Appropriations Act, 2021 and Other Extensions Act
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).

- a. The *date range* covered by this State plan or amendment.
- 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
- 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
- d. Estimated total amount of administrative funds the State needs to complete the work described in this State plan/amendment.²
- 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

Response:

This State plan will cover the date range of August 1st, 2020 through September 30th, 2021. The estimated monthly and total P-EBT issuance are listed below as well as the estimated total number of children to which the State will issue P-EBT benefits. These values represent the hypothesized scenario in which eligible students are evenly split between receiving the maximum monthly benefit amount (learning 5 virtual days/week or 100% of the time), one hybrid monthly benefit amount (learning 3 virtual days/week or 60% of the time), and another hybrid monthly benefit amount (learning 1 virtual day/week or 20% of the time). That said, these numbers do not account for any students who may be deemed eligible for P-EBT benefits during the month of August 2020. While the vast majority of schools in Wisconsin did not begin instruction until September, data is not yet available as to how many schools started instruction and met the 5 consecutive day threshold during August (and, thus, how much might be owed to students as August P-EBT benefits). This information will be gathered through our learning model surveys. Further, these estimations do not account for students who will pursue adjusted benefit rates (through our simplified application process or dedicated email box/call center). It is unknown at this time how many students will seek such adjustments through our provided channels. For both of these reasons, the following numbers are likely under-estimations.

- Estimated monthly issuances: \$ 35,869,572

- Estimated monthly issuances to SNAP households: \$ 15,390,667¹
- Estimated monthly issuances to non-SNAP households: \$ 20,478,905²
- Estimated total issuance: \$ 328,206,581³
- Estimated total issuance to SNAP households: \$ 140,824,600⁴
- Estimated total issuance to non-SNAP households: \$ 187,381,981⁵
- Total number of children to which the State will issue P-EBT benefits:
 - Total number of children in SNAP households: 188,058⁶
 - Total number of children in non-SNAP households: 250,231⁷

The estimated total amount of administrative funds the State needs to complete the work described in this plan is approximately \$ 3,800,000. Finally, our tentative P-EBT issuance schedule for eligible recipients, subject to slight variances based on process implementation variables and other systems interactions, is as follows:

- Issuance in March 2021
 - March 25th, 2021: Issuance to SNAP and non-SNAP households to cover August, September, October, and November benefits
- Issuance in May 2021
 - May 25th, 2021: Issuance to SNAP and non-SNAP households to cover December, January, February, and March benefits
- Issuance in July 2021
 - July 25th, 2021: Issuance to SNAP and non-SNAP households to cover April, May, and June benefits
- Issuance in September 2021
 - September 25th, 2021: Issuance to SNAP and non-SNAP households to cover September benefits

¹ Month with maximum # of school days: 20 days. As we are assuming an even split between students learning 5 virtual days/week, 3 virtual days/week, and 1 virtual day/week, we will use the average of 3 virtual days/week to determine these cost estimates. In line with our benefit level for students learning 3 virtual days/week, this amounts to 60% of the maximum monthly benefit amount. [(20 school days x \$6.82 x 2019-2020 # of SNAP kids) x 0.60]

² [(20 school days x \$6.82 x 2019-2020 # of non-SNAP kids) x 0.60]

³ Includes September 2021 benefits

⁴ [(2019-2020 # of SNAP kids x \$6.82 x 167 school days) x 0.60] + [(2019-2020 # of non-SNAP kids x \$6.82 x 16 school days) x 0.60]

⁵ [(2019-2020 # of non-SNAP kids x \$6.82 x 167 school days) x 0.60] + [(2019-2020 # of non-SNAP kids x \$6.82 x 16 school days) x 0.60]

⁶ Number from 2019-2020 School Year

⁷ Number from 2019-2020 School Year

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:

1. 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:
 - a. directly certified or determined “other source categorically eligible” for SY 2020-2021, *or*
 - b. certified through submission of a household application processed by the child’s school district for SY 2020-2021, *or*
 - c. enrolled in a Community Eligibility Provision school or a school operating under Provisions 2 or 3, *or*
 - d. 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.
2. 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 and confirm their eligibility for P-EBT. Also describe how the State will ensure that it does not issue benefits to school year 2019-2020 graduates and other non-students.
- 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.
- 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.
- 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.).
- 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).

Response: [please use as much space as needed]

For the first P-EBT issuance of the 2020-2021 school year, the Wisconsin Department of Health Services (DHS) will be reliant on information received from and collected by the Wisconsin Department of Public Instruction (DPI) to identify eligible school children and confirm their P-EBT eligibility. To determine which Wisconsin students would have received free or reduced-price meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) had their schools been operating normally, we will first rely on a list

provided by DPI which only contains students currently enrolled in Wisconsin public schools. This list of students includes only those who have previously completed the Free and Reduced-Price Meal application and submitted it to their school for approval – the typical FRPL approval process. As many schools in Wisconsin did not require or communicate the need for families to submit such FRPL applications prior to the start of or throughout the 2020-2021 school year, this list uses the 2019-2020 school year data as its foundation and has been updated to reflect any more recent student additions when available. Specifically, this updating includes the removal of FRPL-eligible students who had graduated as well as the addition of students who are new to the school system and had already completed their FRPL application process. For any students who are not part of DPI's list of FRPL-eligible students (whether because they have not had their FRPL-eligibility determined yet or because they are a private school student not included in DPI's dataset), we will put forth an option for these such students and families to submit a simplified application for P-EBT. To confirm their eligibility once an application is received, DHS will cross-check the student's school against a comprehensive list of Wisconsin schools which participate in the NSLP/SBP or are Community Eligibility Provision (CEP) schools as well as other data markers as needed to verify eligibility.

For later P-EBT issuances of the 2020-2021 school year, as all SNAP-eligible students are also considered directly certified for the NSLP/SBP, we will add any newly enrolled SNAP students to our list moving forward. Finally, students who do not receive SNAP benefits but believe themselves to be eligible for or are currently receiving free or reduced-price meals will have the option to apply directly for P-EBT (with the same verification steps in place as with private school students, for example).

Currently, Wisconsin does not have access to timely student-level learning model information that would be able to assist in supporting P-EBT efforts. In line with the simplified assumptions we plan to employ, the State will not be collecting information on individual child schedules, due to the administrative burden that this would place on an already overwhelmed education system. Instead, the State will ask schools to submit a learning model information survey every 2 months, beginning in January 2021, which retroactively identifies the learning model most utilized for students in each grade during each month. From the following learning model options, schools will be asked to select the option which most closely resembles the instructional situation for each grade within their school.

1. All in-person: All students attended school in-person for all school days of this month.
2. In-person with virtual option: All students are attending in-person, but there is also an option for students to participate virtually. Schools would also choose this option in the instance where one classroom or a subset of a grade level was being schooled virtually due to quarantine.
3. Hybrid: Students have scheduled in-person and virtual days each week. Schools will choose the sub-option which represents the average number of virtual days in which each student in the grade participates each week. Sub-options will include 1 virtual day per week, 2 virtual days per week, 3 virtual days per week, or 4 virtual days per week.
4. All virtual: No students were expected to attend school in-person for all school days of this month.

There will be several partners involved in the successful implementation of P-EBT in the 2020-2021 school year. The high-level roles and responsibilities of each are outlined below.

1. Department of Health Services (DHS)
 - a. Overall program oversight.
 - b. Hiring and supervision of new staff team dedicated to the P-EBT communication plan design and development, verification of eligibility via applications, and problem resolution process.
 - c. Determination of a statewide standard number of school days in each month of the 2020-2021 school year.
 - d. Determination of and clear distinction between learning model options provided to schools.
 - e. Monitoring of card issuances and deliveries.
2. Department of Public Instruction (DPI)
 - a. Provide a current list of students that are eligible to participate in the NSLP/SBP.

- b. Provide a current list of schools that are eligible to participate in the NSLP/SBP.
 - c. Disseminate communications to schools and families regarding program information, eligibility criteria, clarification on school learning models, and important deadlines.
 - d. Disseminate learning model surveys to schools at specified intervals.
3. Deloitte
- a. Enhance the SNAP eligibility system, adding functionality into CARES so that applications can be viewed and processed, benefits can be issued in real-time.
 - b. Match direct certification lists with the DPI-provided dataset for the 2nd and 3rd P-EBT issuance.
 - c. Execute mailings and other communications upon request from DHS.
 - d. Send benefit issuance files to FIS for completion/execution.
4. FIS
- a. Process benefit issuance files once received from Deloitte and issue P-EBT cards.
 - b. Update and include message inserts mailed before and then with P-EBT cards.
5. Department of Children and Families (DCF)
- a. Provide direct certification data and other programmatic and demographic information not already provided through DPI-provided data.
6. Statewide Network of Partners
- a. Communicate P-EBT information to eligible families, particularly assisting in the engagement of eligible non-SNAP households.

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:

1. 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.
2. 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.).
3. 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]

DHS will be provided a list from DPI of all Wisconsin public, private, and choice schools that participate in the NSLP. To then determine when each of these schools met the 5 consecutive day threshold of reduced attendance or hours, DHS will solicit this information directly from schools through the use of a survey with communication and facilitation assistance from DPI.

Due in large part to data accessibility limitations, the State intends to employ several simplifying assumptions to facilitate the timely and accurate implementation of the P-EBT program during the 2020-2021 school year. First, as data is not and cannot feasibly be collected to track individual student learning schedules, we will be determining P-EBT benefits at the grade level. To ensure program integrity, students and families will be able to reach out to our new staff via hotline or email should they feel their allotment is inaccurate based on their actual learning experience (particularly relevant to students in grades for which schools selected the "In-person with virtual" learning model option as well as for private school students who were not included in the list of FRPL-eligible students originally provided by DPI). This request will be attended to, verified, and completed (if applicable) by the new staff we intend to hire.

Second, for each month of the 2020-2021 school year, we have determined a statewide standardized number of school days which will represent the maximum number of days on which students in Wisconsin might be eligible for P-EBT benefits for that month. There are several reasons why we feel this assumption is necessary. To begin, in Wisconsin, DPI has confirmed that there is no required minimum number of school days per year on which each school must provide instruction. To continue, each type of school (including but not limited to high schools, middle schools, elementary schools, alternative schools, and private schools) can individually decide which days each month to offer and to not offer instruction. In other words, schools can individually decide which holidays to honor as non-instructional days and can implement unique conferences, professional development opportunities, or other reasons to miss a school day. Finally, the days of instruction per month is not tracked by schools nor reported to DPI. To combat this lack of uniformity, the State finds the above simplifying assumptions necessary. To representatively calculate statewide ‘days of school per month’, we took an average of the full instructional days offered within each of the 3 largest public school districts (according to publicly available district calendars for the 2020-2021 school year): Milwaukee Public Schools, Madison Metropolitan School District, and Kenosha Unified School District. The results are as follows:

2020-2021 Statewide Average School Days in:

- August: 0
- September: 16
- October: 20
- November: 17
- December: 15
- January: 18
- February: 18
- March: 20
- April: 17
- May: 19
- June: 7

- Total: 167 days

Though the 3 largest school districts in Wisconsin did not have instructional days during the month of August 2020⁸, we will continue to solicit learning model information from schools for that month. Doing so will allow us to capture any schools which did, in fact, start instruction and may have become eligible for P-EBT (by meeting the 5 consecutive day threshold) prior to September 1st. For schools which began instruction and met the P-EBT eligibility criteria prior to September 1st, we will calculate and provide appropriate P-EBT benefits on a case-by-case basis.

Generally speaking, benefit calculation for a school’s first month of 2020-2021 P-EBT eligibility – whether that first month is August, September, October, or later – will be handled differently than that of the benefit calculation for subsequent months. Through our school surveys, eligible schools will report the date on which they met the 5 consecutive school day threshold. Based on that date, we will determine how many school days likely remained in that month and utilize that number to determine that school’s maximum possible benefit. This number may be either higher or lower than the statewide average school days calculated above for that month. In subsequent months after the month in which the school first met P-EBT eligibility criteria, the benefit levels available to students at this school will become aligned with the statewide standards outlined above.

⁸ Wisconsin Statute sec. 118.045 stipulates that no public school district will commence its school term before September 1st, with the exception of those that request to begin earlier due to extraordinary reasons. In the 2020-2021 school year, DPI reports that 17 districts in Wisconsin requested that all or some of their schools begin instruction in August. This number does not account for charter or private schools, some of which likely began instruction in or before August as well.

Third, once we begin to roll-out and promote the P-EBT program for the 2020-2021 school year, we are employing simplifying assumptions around eligibility starting dates for students who cannot receive systematic issuances and must apply through our simplified application process. In accordance with federal guidance and flexibilities, at any point in the 2020-2021 school year, if a student becomes FRPL-eligible, we will assume that their eligibility extends back to the start of this school year. In contrast, for students who apply and are deemed eligible for P-EBT benefits after the 2020-2021 school year concludes but before the fourth round of issuances in September, we will assume that this student is eligible for P-EBT for the 2021-2022 school year only.

Fourth, assuming consistent and ongoing communication from DHS and DPI of deadlines for schools to report their learning models (likely in February, April, and June), we will assume that a school's learning model has not changed from the previous reporting if we do not receive a timely submission of their data. That said, our new staff team will individually follow-up with schools who fail to meet these reporting deadlines to confirm learning model updates.

Fifth, we are assuming that any and all data provided by the schools regarding student eligibility for free or reduced-price meals is the best and most recently available data. DPI has been made aware that, given the circumstances and heightened demands of the 2020-2021 school year, some schools may not have updated each student's FRPL-eligibility status since the end of the 2019-2020 school year. That said, DPI has no clear way to distinguish between school-submitted data that has been recently updated versus data that has been carried over from the previous school year. As such, we must assume that the list of FRPL-eligible students provided to DHS by DPI (and compiled with information directly from schools) is the most accurate information available at this time.

Sixth, in order to continue to provide P-EBT benefits to eligible students up until the September 30th, 2021 funding deadline, we will be employing a unique and more proactive issuance model for only the month of September 2021 (the start of the 2021-2022 school year). As NSLP/SBP eligibility lists will not have been updated by schools before this deadline, we will rely on the existing list of eligible students provided to DHS from DPI during the 2020-2021 school year and presume continued eligibility for P-EBT. We will also assume that September 2021 will include the same number of school days as our statewide tabulation for September 2020 (16 school days). Further, at the time of the submission of this plan, we do not have access to 2021-2022 meal reimbursement rates, so we will continue to use the 2020-2021 \$6.82 figure for the purposes of budgetary planning. In order to obtain the learning model of schools in as timely and accurate of a way as possible, we will request that eligible schools submit this information on the first day of instruction. Though this learning model may subsequently change throughout September 2021, having schools provide current learning model on the first day of instruction will allow enough time to process and issue P-EBT benefits before the September 30th, 2021 funding deadline.

5. Benefit Levels

Standard for Benefit Levels

1. The full daily benefit level for each eligible child is equal to the free reimbursement for a breakfast and a lunch 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	Daily Total
Contiguous U.S.	\$3.60	\$2.26	\$5.86
Alaska	5.79	3.64	9.43
Hawaii, Guam, Virgin Islands, Puerto Rico	4.20	2.64	6.84

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.

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]

As detailed in previous sections of this Plan, the State proposes determining each grade's learning model on a month-to-month basis and then issuing the corresponding level of benefit for all P-EBT eligible students in that grade of that school. Once a grade's learning model (from the options previously listed) is determined, we will calculate the benefit level for eligible students in that grade by using the maximum monthly P-EBT benefit as a baseline. Maintaining the simplifying assumptions previously explained regarding the number of school days per month in the 2020-2021 school year, the maximum monthly P-EBT benefit for each month is listed below.

- August 2020: 0 school days x \$6.82 = \$0 in P-EBT benefits *
- September 2020: 16 school days x \$6.82 = \$109.12 in P-EBT benefits
- October 2020: 20 school days x \$6.82 = \$136.40 in P-EBT benefits
- November 2020: 17 school days x \$6.82 = \$115.94 in P-EBT benefits
- December 2020: 15 school days x \$6.82 = \$102.30 in P-EBT benefits
- January 2021: 18 school days x \$6.82 = \$122.76 in P-EBT benefits
- February 2021: 18 school days x \$6.82 = \$122.76 in P-EBT benefits
- March 2021: 20 school days x \$6.82 = \$136.40 in P-EBT benefits
- April 2021: 17 school days x \$6.82 = \$115.94 in P-EBT benefits
- May 2021: 19 school days x \$6.82 = \$129.58 in P-EBT benefits

- June 2021: 7 school days x \$6.82 = \$47.74 in P-EBT benefits
- September 2021: 16 school days x \$6.82 = \$109.12 in P-EBT benefits

* Benefit calculations for students at schools/in grades that did, in fact, become P-EBT-eligible in August 2020 will be calculated on a case-by-case basis.

As previously explained, maximum benefits will likely vary from the above values for each school’s first month of eligibility based on when in the month the school meets the 5 consecutive school day threshold and becomes P-EBT-eligible (thereby altering the number of eligible school days and maximum possible benefit in that month). That said, all subsequent months after the first month of eligibility will align with the above standardized school days and maximum benefit values.

To continue, using these maximum values as a baseline, each individual student’s monthly P-EBT benefit issuance will be determined by both the calendar month and their grade’s learning model as reported by their school.

1. All in-person: Under our Plan, students whose grade is following this learning model are not eligible for P-EBT benefits for that month.
2. In-person with option for virtual: Under our Plan, in most cases, students whose grade is following this learning model are not eligible P-EBT benefits for that month. For any students who attended virtually despite their grade’s overarching in-person learning model (due to the need to quarantine, for example), they will have the option to complete a simplified application indicating their actual learning model. On this application, they will have the opportunity to reflect upon their actual learning model experience. Based on which learning model option most closely matches their stated experience and assuming verification by our new staff with the school, the student’s benefits will correspond to the appropriate level as calculated below.
3. Hybrid (1 virtual day per week): Under our Plan, students whose grade is following this learning model are eligible for 20% of the maximum monthly P-EBT benefit because in any given week, their school has indicated that they are attending 1 day per week virtually (1 out of 5 week days, or 20%) and 4 days per week in-person (4 out of 5 week days, or 80%).
4. Hybrid (2 virtual days per week): Under our Plan, students whose grade is following this learning model are eligible for 40% of the maximum monthly P-EBT benefit because in any given week, their school has indicated that they are attending 2 days per week virtually (2 out of 5 week days, or 40%) and 3 days per week in-person (3 out of 5 week days, or 60%).
5. Hybrid (3 virtual days per week): Under our Plan, students whose grade is following this learning model are eligible for 60% of the maximum monthly P-EBT benefit because in any given week, their school has indicated that they are attending 3 days per week virtually (3 out of 5 week days, or 60%) and 2 days per week in-person (2 out of 5 week days, or 40%).
6. Hybrid (4 virtual days per week): Under our Plan, students whose grade is following this learning model are eligible for 80% of the maximum monthly P-EBT benefit because in any given week, their school has indicated that they are attending 4 days per week virtually (4 out of 5 week days, or 80%) and 1 day per week in-person (1 out of 5 week days, or 20%).
7. All virtual: Under our Plan, students at this school are eligible for 100% of the maximum monthly P-EBT benefit, calculated as at the beginning of this section.

6. 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).
- 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.

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?
- 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.
- 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.
- 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.
- 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?

Response: [please use as much space as needed]

The State's timeline is predicated on much of the preliminary work being completed prior to receiving full

approval. For example, the State intends to have a comprehensive list of eligible students (compiled using data from DPI, DCF, and DHS) well before approval. Following approval, we will verify the data one more time before putting the file into production. Additionally, DHS will be working with our EBT vendor – FIS – consistently throughout the entire implementation process to avoid any bottlenecks after approval. The initiation of our high-level timeline is based on the assumption that we will already have a signed customer agreement with FIS that may only need slight adjustment after FNS approval. Finally, our communication processes will be initiated well ahead of FNS approval.

High-Level Tasks to Complete Post-Approval:

- Communications sent to school administrators, families, and shared with the public through existing online platforms and outreach partner support
- New staff hired to support problem resolution processes and continued communications
- Schools return completed first round learning model surveys, data matching process begins
- Systems updates are completed to support administrative functions for the program (streamlining case review and resolution process)
- Benefits are issued via FIS
- Process is repeated for second, third, and fourth round of P-EBT issuances (communications, survey completion, data matching, benefit issuance)

DHS will issue new, generic P-EBT cards to non-SNAP households. These will resemble the cards issued in the 2019-2020 school year. Specifically, for households who received P-EBT benefits in the 2019-2020 school year and are eligible for benefits again in this year, we will issue new, generic P-EBT cards. In the 2019-2020 school year, these households were not informed that P-EBT cards were permanent or had longer-term uses, so we expect many of these families will have disposed of their cards already. For households new to P-EBT in 2020-2021, DHS will issue new, generic P-EBT cards. In contrast, existing SNAP households will receive benefits directly on their current SNAP (QUEST) cards, consistent with the process in 2019-2020. We will use a sub-benefit type in order to differentiate SNAP and P-EBT benefits for reporting purposes. P-EBT benefits will be designated the highest spend priority, similar to the way the State operated last year. P-EBT benefits will follow the same expungement schedule as SNAP benefits, meaning they will age the same way in the State's eligibility system and in the State's EBT Processor's (FIS) system. Benefits will be expunged after 365 days.

The return mail process will be managed by the newly hired problem resolution team. The State currently receives a daily undelivered mail report. It is our understanding that our EBT processor (FIS) will be able to identify which pieces of returned mail were P-EBT cards so that the problem resolution team can proactively reissue cards. If FIS is unable to make the required system changes in time, the process will resemble the 2019-2020 process in which a dedicated team responds to incoming emails and phone calls by researching why cards were not received and reissuing when appropriate. Additionally, the PEBT problem resolution will spot check batches of cards that were mailed to make sure cards were delivered and activated. If cards are found undelivered, the problem resolution staff will contact families and resolve address issues.

7. 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.

1. USDA strongly encourages States to provide a means to resolve disputes and answer questions from actual or potential P-EBT households.
2. 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.
- 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.
- 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).
- 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]

Based on experience from the first round of P-EBT, DHS will be creating a specific unit to support case management and problem resolution for P-EBT operations. This group will be supporting customer service including a hotline and dedicated email box, coordination with schools, fair hearings and other day to day management of P-EBT operations post roll-out. While the hotline has not yet been established, the dedicated email box can be reached at: PEBTsupport@wisconsin.gov.

The problem resolution team will utilize the same translation services used by DHS's SNAP team, which will help address challenges encountered by families with limited English proficiency.

Foster children are known to the State's eligibility system, so they will be treated in the same manner as SNAP households. Homeless children are known to the State's eligibility system. As such, these children already have case numbers which include mail addresses, which can include county agencies or shelters. Since these children are already known to our system, benefits will be loaded systematically onto existing SNAP cards.

Social Security Numbers (SSNs) are not required as part of P-EBT eligibility. While SSNs will help DHS identify and match a child to a SNAP case more efficiently, the problem resolution team will be empowered to research individual cases should a match not be identified. There will be no impacts to those students who either do not have a SSN or whose parents choose not to provide one.

The problem resolution team will have staff responsible for answering a hotline. Parents of children without internet access can call the hotline with questions. Should the parents/guardians need to fill out a simplified application, they can do so over the phone. Internet access is not an eligibility factor for P-EBT, and, as such, we will make every effort to provide the same level of service to those without internet access.

In addition to hiring operational staff, DHS is also planning to hire communications specialists who will be responsible for supporting the public information campaign for this initiative. This will include regular updates to both the DHS website and social media and the development and dissemination of other print and non-print materials, including letters, brochures, and other informational bulletins.

The DHS team (inclusive of the new operations and communications staff) will work directly with DPI to share information about the program directly with schools through the DPI administrator's email distribution list. This email list, disseminated to public and choice schools, advocacy groups, and other stakeholders, boasts a very high open rate. Emails are also published on the DPI website. DPI relationships with advocacy groups can also be leveraged to disseminate information to private schools.

DHS will send one-time mailers to all SNAP households with P-EBT program details, including benefit issuance dates, benefit amounts, an explanation of what P-EBT benefits are and how they qualified, and information about the problem resolution process including the hotline phone number and email address. Similarly, DHS will provide information to non-SNAP households on how to use the card, how to set up the PIN (following the State's standard PIN process for SNAP households), general SNAP purchase rules, opt-out language, and confirmation that the card and benefits are non-transferrable. This will be provided through a combination of materials, including an EBT card mailer, a one-time mailing to individuals known to the eligibility system

through other public programs, and the streamlined application for entirely new households. Information contained on each communication is listed below:

The mailing sent to each P-EBT household will contain:

- A description of P-EBT
- Either an explanation of where benefits can be used and what benefits can be spent on, or, if the length of the notice is too long, a hyperlink to a DHS website that explains such details, including an explanation of violations and penalties.
 - Note: Our notices are still being drafted. If the State chooses a comprehensive notice that details benefit level calculation, the notice may be too long to include all relevant details. As such, the notice will direct households to the DHS website and the P-EBT household instead.
- Details regarding how to contact the PEBT support hotline/email address
- Other details as necessary

The insert that accompanies the P-EBT card will contain:

- Text that indicates that P-EBT benefits are non-transferable
- Instructions for destroying the card and/or returning benefits
- Instructions for using the card, including accessing the ebtEDGE app and creating a secure PIN

8. Over-issuance of P-EBT benefits

States should outline a process to manage cases of benefit over-issuance. 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. In no cases can States reclaim P-EBT benefits by reducing the household's SNAP benefit.

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]

We will not reduce SNAP payments to compensate for P-EBT over-issuance. Throughout the initial data gathering process, we are confident in our ability to correctly issue benefits and to reduce the number of over-issuance cases to as few as possible. By using the same back-end verification procedures as the 2019-2020 iteration, we will systematically prevent duplicate issuances for P-EBT. In the 2019-2020 school year, by using this process, we eliminated all but a few cases of over-issuance. The few cases that resulted in duplicate issuances were a result of incorrect NSLP information received from DPI. We have corrected this information, and DPI will be sharing an updated, comprehensive list of all schools that participate in the NSLP/SBP. Overall, the State is issuing benefits based on the "best available information". Should cases of over-issuance come to our attention and/or if the State becomes aware of changes in this information, we will investigate the matter and adjust our processes accordingly.

9. 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.

10. 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.

11. 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.”

12. 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.

13. 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:

Signature
Print Name and Title

Signature
Print Name and Title

Date of Request: _____