

# Summer Electronic Benefit Transfer for Children (Summer EBT) Plan for Operations and Management (POM) Template

## Instructions

Each State and Indian Tribal Organization (ITO) that intends to administer the Summer EBT Program beginning in 2024 must submit to the Food and Nutrition Service (FNS) regional office a final POM not later than February 15, 2024.

In States with multiple Summer EBT agencies, the coordinating Summer EBT agency is the primary point of contact for the Summer EBT Program and is responsible for the complete and timely submission of the POM. However, the POM must be developed in cooperation with all State Summer EBT agencies and be reflective of the plans and administrative funding needs of both. For ITOs, the administering agency is responsible for its program's POM. For the purposes of this document, the term 'Summer EBT agency' includes all administering agencies within a State or ITO unless otherwise specified.

The final POM must:

1. Address all the requirements in this template, and
2. Be approved by FNS before the Summer EBT agency may draw **federal food benefit funds** for the fiscal year.

## Amendments

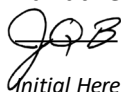
At any time after approval, the coordinating Summer EBT agency may request to amend a final POM to reflect proposed changes. The coordinating Summer EBT agency must submit any amendments to the FNS regional office for approval. The amendments must be signed by the Summer EBT agency-designated official(s) responsible for ensuring that the Program is operated in accordance with the POM.

## Required Attachments – *described in Sections 1 & 6*

- A copy of the inter-agency written agreement(s) between the Summer EBT coordinating agency and each partnering agency, if applicable [[7 CFR 292.3\(c\)](#), [7 CFR 292.8\(e\)\(1\)](#), [7 CFR 292.8\(e\)\(8\)](#)]
- An FNS-366A expenditure plan for each agency within the State or ITO that will draw administrative funds from FNS [[7 CFR 292.8\(e\)\(3\)](#)], i.e., part of the administrative budget
- A budget narrative that corresponds with the 366A(s), which describes how costs within the budget categories were derived, and demonstrates links between expenditures and specific activities/tasks [[7 CFR 292.8\(e\)\(3\)](#)], i.e., part of the administrative budget
- A copy of the fair hearing procedures for participants [[7 CFR 292.8\(e\)\(12\)](#); [7 CFR 292.26](#)]

## Section 1: Administrative Budget

- 1.1 Attach 366A expenditure plans(s) that reflect planned Fiscal Year 2024 administrative cost requirements for each agency within the State or ITO that will draw Summer EBT administrative funds from FNS [see [7 CFR 292.8\(e\)\(3\)](#)]. See the policy memo [SEBT 01-2024, FM 01-2024 Summer EBT Administrative Funding Process for FY2024, October 18, 2023](#) for further information about the 366A.
- 1.2 Attach a budget narrative that corresponds with the 366A(s), describes how costs within the budget categories were derived, and demonstrates links between expenditures and specific activities/tasks. The budget narrative will include the administrative needs of all Summer EBT agencies and local educational agencies [see [7 CFR 292.8\(e\)\(3\)](#)].
- 1.3 The Summer EBT agency attests that the attached 366A expenditure plan(s) and budget narrative comply with any standards prescribed by the Secretary for the use of these funds.

  
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## Section 2: Issuance [[7 CFR 292.8\(e\)\(10\)](#)]

- 2.1 Provide an estimate of the number of children who will be served for the year this plan covers [[7 CFR 292.8\(e\)\(2\)](#)]:

Estimated number of children served in Summer EBT 2024: 450,000<sup>1</sup>

*Instructions: Provide an estimated number of children that will be served in Summer EBT during the year this plan covers. A good starting point for calculating your estimate is the number of children who are eligible for Free and Reduced-Price (FRP) meals in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) within your geographic State or ITO service area. The number of free and reduced-price eligible children is reported annually each year on the FNS-10: Report of School Program Operations. The number reported on this form can inform estimates. Additionally, FNS' Summer EBT toolkit provides estimates that may be used as a*

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<sup>1</sup> According to the October 2023 National School Lunch Program reimbursement claims, the total number of FRPL-enrolled students attending NSLP-participating schools at that point was 426,809. Wisconsin's overall estimate of students served by Summer EBT in 2024 has been increased to 450,000 for a few key reasons. First, there are a handful of SFAs that had not had their FRPL-enrolled students counted in October 2023 due to being in withholding as a result of noncompliance. Second, the population of FRPL income-eligible students who attend CEP schools included in the 426,809 count is likely an underestimation according to DPI. CEP schools use a prescribed calculation formula to report the proportion of their total enrollment made up of FRPL income-eligible students, and this formula typically underrepresents the actual number of FRPL income-eligible students. Third, the 426,809 October 2023 total does not include school-age students who will be able to be directly certified but do not attend an NSLP/SBP school.

reference point: [Estimated Number of Summer EBT Eligible Children](#). ITOs may contact the FNS regional office for assistance in determining the number of FRP children in their service area.

2.2 Provide the start and end dates of the summer operational period and an explanation for why these dates were selected [[7 CFR 292.2](#); [7 CFR 292.8\(e\)\(10\)\(i\)](#)]:

First day of the summer operational period: June 30, 2024

Last day of the summer operational period: August 29, 2024

Explanation:

In Wisconsin, each school district determines its own operational calendar which means there is no statewide standard summer period. In general, though, all schools complete the school year by the end of June, and it is common to begin the following school year near the end of August.

*Instructions: Summer operational period [[7 CFR 292.2](#)] means the benefit period that generally reflects the period between the end of classes during the current school year and the start of classes for the next school year, as determined by the Summer EBT agency [[7 CFR 292.2](#)]. The summer operational period does not need to align with calendar months, nor does it need to be 3 months in duration (participants will get \$120 per summer regardless of the number of days that they're out of school). The Summer EBT agency should review school calendars within the State or ITO and select start and end dates that will allow students to access benefits when they are not in school and not able to access school meals. Given the variation in school calendars within States and ITOs, it is reasonable to designate a summer operational period that includes days when some students are still in school, and does not include days when some kids are on break. The objective is to select dates that are generally reflective of school calendars in the State or ITO.*

*For example, if schools in a State or ITO generally start summer break the second week of June and resume school the last week of August, the Summer EBT agency could select a summer operational period that runs from June 15 – August 25. These dates cover the majority of summer break for most children in the State or ITO. The Summer EBT agency could provide a \$120 benefits June 8 (7-14 days before the start of the summer operational period), or they could provide benefits in multiple issuances. For example, issue \$40 on June 8, July 6, and August 3, for a total of \$120 over the course of the summer.*

*Reminder: To the extent feasible in 2024, benefits must be issued and available for children to spend at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. However, benefits expunge 122 days after issuance, so some benefits will be spent after the end of the summer operational period. Children have until the last day of the summer operational period to apply for benefits using a Summer EBT application. If flexibility with timeframes for benefit issuance is needed in 2024, the State should indicate the reason for the delay.*

2.3 Provide the date(s) when benefits will be issued [[7 CFR 292.8\(e\)\(10\)\(ii\)](#)], [7 CFR 292.15\(c\)](#)]:

First issuance: 6/22/2024

Second issuance (if applicable): \_\_\_\_\_

Third issuance (if applicable): \_\_\_\_\_

Additional information on schedule for benefit issuance, if any: See below

The primary issuance of Summer EBT benefits in 2024 will take place on June 22<sup>nd</sup>, 2024 – 8 calendar days before the start of the 2024 summer operational period. This issuance will include the vast majority of eligible students, including those who are able to be streamlined certified as well as those who apply via S-EBT application early enough<sup>2</sup> for the application to be processed prior to early June. As part of this issuance, all children known to be eligible will receive their benefits on the same date. Additionally, eligible children will receive the full \$120 of Summer EBT benefits at once as allowed by 7 CFR § 292.15(f)(1); the benefit amount will not be split across multiple points in time.

For any children who do not apply early enough or are not known-to-be-eligible<sup>3</sup> in time for inclusion in the June 22<sup>nd</sup> issuance, DHS will facilitate continued issuances of Summer EBT benefits throughout the summer operational period (and beyond as applicable). Following the June 22<sup>nd</sup> major issuance, there will be ongoing issuances that take place approximately every two weeks thereafter. These biweekly (twice per month) issuances will continue until mid-September. As the deadline for submitting an S-EBT application for 2024 will be August 29<sup>th</sup>, the final biweekly issuance will take place approximately two weeks after that deadline (ensuring that any students who apply right at or before the deadline will be able to receive their benefits within the required 15-day window per 7 CFR § 292.15(c)(1)(i)(B), if eligible).

Beyond mid-September, benefits will only be issued semi-automatically (no major systematic issuances) on an as-needed basis. Benefits that are issued past mid-September will only be issued as a result of a correction or as ordered via a fair hearing appeal<sup>4</sup>.

Given this is a brand new program still being formulated and built, there is not sufficient time to put the necessary systems in place, provide ample time for families and schools to submit information as applicable, and issue benefits before June 22<sup>nd</sup>. This is the earliest that Wisconsin can begin issuing Summer EBT benefits for 2024 after identifying as many eligible children via streamlined certification as possible while also maintaining program integrity and avoiding dual participation and inaccurate issuances.

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<sup>2</sup> Wisconsin will lean on public communications to strongly encourage families to utilize the Summer EBT application in March and April to ensure as many children as possible can receive their benefits as part of the June 22<sup>nd</sup> issuance.

<sup>3</sup> This will include school-age children who enroll in one of the applicable public assistance programs during the summer months and, therefore, meet the criteria for streamlined certification.

<sup>4</sup> Per [IFR guidance](#), fair hearing appeal requests will be accepted for 90 days after the end of the summer operational period. This means that households can submit an appeal request essentially through the months of September, October, and November 2024.

As a clarification, in Wisconsin, benefits are loaded onto EBT cards and are available to spend as soon as the participant receives, activates, and PINs the card. For recipients with existing EBT cards in Wisconsin, benefits are loaded onto their EBT card automatically and are available to spend right away (there is no delay between the loading of benefits and their availability to be spent).

*Instructions: Benefits are 'issued' when they are loaded onto EBT accounts and available for the participant to spend. For example, if a Summer EBT agency loads benefits on accounts and mails cards in early May, but sets the availability date on those benefits to June 1, the benefits are not considered to be 'issued' until June 1 because that's when the benefits are available to spend. Issuance is not the same as loading benefits on EBT accounts or mailing EBT cards. Summer EBT agencies may opt to provide households with their benefits in one issuance or in multiple issuances. The first, or only, if applicable, issuance must be provided at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. Summer EBT agencies have the flexibility to determine the timing of subsequent benefit issuances, e.g. monthly issuances. If the Summer EBT agency plans to stagger issuances throughout the month or otherwise modify that issuance schedule, an explanation should be provided under additional information. If flexibility with timeframes for benefit issuance is needed in 2024, the State should indicate the reason for the delay.*

2.4 Does the State or ITO service area have Local Education Agencies (LEAs) operating on a continuous school calendar [\[7 CFR 292.2\]](#)?

- Yes (complete the rest of this question)
- No (skip to question 5)

If yes, describe the school calendar(s) and break schedule(s) for LEAs operating on a continuous school calendar [\[7 CFR 292.15\(b\)\]](#):

Provide date(s) or timeframes when benefits will be issued:

First issuance: \_\_\_\_\_

Second issuance (if applicable): \_\_\_\_\_

Third issuance (if applicable): \_\_\_\_\_

Any additional information on the schedule(s) for benefit issuance:

*Instructions: SEA instructions: Continuous school calendar means a situation in which all or part of the student body of a school is (a) on a vacation for periods of 15 continuous school days or more during the period October through April and (b) in attendance at regularly scheduled classes during most of the period May through September.*

Regardless of when benefits are issued, children attending schools operating on a continuous school calendar must receive the equivalent of three months of benefits (\$120 in 2024), consistent with children who have a traditional summer break [[7 CFR 292.15\(e\)\(4\)](#)].

2.5 Benefits will be provided using (select all that apply) [[7 CFR 292.15\(c\)\(2\)](#)]:

An existing EBT account used to deliver other electronic benefits

Describe the existing account to which benefits will be added (e.g. SNAP or WIC) and how they will be separately tracked in that account (e.g. a different benefit type or sub-type):

A unique account for Summer EBT only

Other payment instrument (provide explanation):

When the primary parent or caretaker of an eligible child already has an active EBT card available, Summer EBT benefits will be issued onto that existing card. This existing EBT card could be a QUEST card or a P-EBT card (the type of EBT card first created and utilized during the COVID-19 public health emergency). When the primary parent or caretaker of an eligible child does not already have an EBT card provided by the State (a QUEST or P-EBT card), a new QUEST card will be issued/mailed to them with their Summer EBT benefits loaded onto it. In Wisconsin, QUEST cards are the EBT cards onto which other types of food benefits (like SNAP and Pandemic EBT) have been issued.

In order to differentiate the multiple different types of benefits that may be on the same EBT card/account, a new benefit type has been created specifically for Summer EBT. This means that a single card/account could contain benefits of up to three unique types: SNAP benefits, Pandemic EBT benefits, and Summer EBT benefits. This also allows for compliant expungement, warning letter generation, and report generation.

*Instructions: Summer EBT benefits may be loaded on an existing EBT account associated with an existing EBT card (e.g. SNAP for State or WIC for ITOs), or a new EBT account and card may be issued for Summer EBT only. A Summer EBT agency that opts to co-load Summer EBT benefits on existing EBT accounts will need to also issue new Summer EBT accounts/cards for eligible children who are not a member of a household with an existing EBT account. Check the box(es) that corresponds to your planned method for providing benefits. If 'other' is selected, provide an explanation. Use of EBT cards is the industry standard for SNAP and WIC, and FNS expects that Summer EBT agencies will issue Program benefits on EBT cards in a similar manner to SNAP or WIC. However, Section 13A(b)(2)(B) of the [Richard B. Russell National School Lunch Act](#) allows benefits to be issued through another electronic means, as determined by the Secretary. In the event a Summer EBT agency wants to adopt a new method of Summer EBT payment, such as payment with a mobile phone, USDA will work with the Summer EBT agency to determine whether and how this can best be executed while still meeting other program requirements. Some Territories operating the Nutrition Assistance Program (NAP), including American Samoa and the Commonwealth of the Northern Mariana Islands, do not currently issue Program*

*benefits electronically. For these agencies, Summer EBT benefits may be issued in the same manner as NAP benefits.*

2.6 Summer EBT agencies will need to issue new accounts/cards for children who are not associated with an existing EBT account, or for all children if the Summer EBT agency does not choose to co-load benefits on existing accounts for children who have them (see question 5) [[7 CFR 292.15\(c\)\(2\)](#)]. Benefits that are not loaded on existing EBT accounts will be issued:(select all that apply):

- On one account/card to heads of households, to the extent States and ITOs have contact information and can determine which children are in a household
- To each eligible child on account/card

As is the case for SNAP and Pandemic EBT benefits issued in Wisconsin, Summer EBT benefits are issued to the primary parent/caretaker of an eligible child. Any child determined to be eligible whose primary parent/caretaker does not already have a QUEST or P-EBT card will be issued a new QUEST card (See Section 2.5 for more information). Further, if one adult is the primary parent/caretaker for more than one eligible child in their household, the benefits for each eligible child will be issued onto the same EBT card whenever possible. The State of Wisconsin is not in the practice of issuing benefits to eligible children directly<sup>5</sup> nor of issuing benefits onto separate cards/EBT accounts for members of the same household.

Other Issuance Logistics (Explained):

- Each student determined eligible for 2024 benefits will be issued a one-time lump sum of \$120
- S-EBT benefits will be issued onto existing EBT cards when possible (and onto new QUEST cards when not possible).
  - o The QUEST card is the EBT card Wisconsin (DHS) uses for all issuances of SNAP benefits. P-EBT benefits have also historically been added onto QUEST cards when available. The P-EBT card is the EBT card Wisconsin (DHS) used for issuances of P-EBT benefits when an eligible household did not already have a QUEST card.
    - For students that are part of a household that already has an active QUEST or P-EBT card, S-EBT benefits will be added onto their existing EBT card.
    - For students that are part of a household that does not already have an active EBT card, S-EBT benefits will be added onto a new QUEST card and mailed to the household. In this case, a custom informational mailer<sup>6</sup> will be

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<sup>5</sup> The only exception to this occurs when an eligible child is their own primary caretaker and has documented legal authority to receive benefits on their own behalf.

<sup>6</sup> DHS will write/design a custom mailer that will be sent along with QUEST cards issued to households who are receiving a new card due to their Summer EBT eligibility. This mailer will differ from the one that usually accompanies QUEST cards; that mailer shares information more pertinent for SNAP recipients (as QUEST cards have historically been issued primarily for the purposes of getting SNAP benefits into the hands of eligible individuals).

- sent to the household explaining how to activate/use it and S-EBT-specific information as to why they are being issued a QUEST card.
  - S-EBT benefits (and the EBT card onto which they are issued) will be in the parent's/caretaker's name – they are not issued directly to the student. This is in line with how Wisconsin handles SNAP and P-EBT issuances.
  - When multiple students in a household are eligible for benefits, benefits for all students will be added onto one EBT card/account per household whenever possible. Only in rare circumstances will separate EBT cards be issued to the same household for their eligible students.
- A unique S-EBT benefit type will be created and utilized.
  - Similarly, SNAP has its own benefit type, and P-EBT has its own benefit type.
  - Despite these three benefit types potentially being issued onto the same EBT card, this will allow for the continued clear tracking and reporting of S-EBT benefit issuance, spending, and expungement.
  - The spend priority will be (1) Summer EBT, (2) P-EBT, and (3) SNAP benefits. This will allow for S-EBT benefits to be spent before other benefit types (with longer expungement periods) are utilized.
- Replacement of benefits
  - Summer EBT benefits will be eligible for replacement by DHS when a household reports that food purchased with their benefits was destroyed in a household misfortune or disaster per 7 CFR § 292.15(g)(5). This will follow existing SNAP benefit replacement processes as much as possible.
- Expungement
  - Any Summer EBT benefits remaining on a QUEST or P-EBT card for more than 122 days after the date the benefits were issued will be systematically removed as required by 7 CFR § 292.15(h)(1)(i).
  - Information about expungement will be included in notices sent at the time of benefit issuance.
  - Households with a non-zero balance of Summer EBT benefits as of 60 days post-issuance will be sent a notice informing them of their upcoming expungement and steps to take to avoid benefit removal.
    - This ensures that all households are warned at least 30 days prior to expungement of their benefits, per federal requirements.
    - This notice will be similar to existing expungement warning letters sent to SNAP and P-EBT households but will include specific information about the Summer EBT program rules and where to direct Summer EBT-specific questions.

*Instructions: The Summer EBT agency will need a plan to provide benefits to eligible children whose benefits are not loaded on an existing EBT account, either because the Summer EBT agency chooses not to co-load benefits or because the child is not associated with an existing EBT account (e.g., a SNAP or WIC account). The Summer EBT agency may provide each eligible child with their own Summer EBT card and/or issue cards to the head of household, grouping children in households as able.*



- 2.7 Describe the procedures the Summer EBT agency will implement to provide access to households experiencing homelessness and other vulnerable populations, e.g., children in foster care, children from households with limited English proficiency [[7 CFR 292.8\(e\)\(10\)\(vi\)](#), [7 CFR 292.15\(c\)\(1\)\(v\)](#)].

DHS will bring on seasonal contracted staff to serve as the Summer EBT Support Team, a specific unit to support case management and problem resolution for all Summer EBT operations. As was the case with Wisconsin's Pandemic EBT Support Team in prior years, this group will support customer service via a dedicated phone line and email inbox.

This Summer EBT Support Team will utilize the same translation services used by the DHS SNAP team, which will help address challenges encountered by families with limited English proficiency. Program promotional materials and notices will be available in Wisconsin's most commonly spoken languages, to the extent practicable. Children living in foster care are known to the State's eligibility system, so they will be treated in the same manner as children within SNAP households and identified as eligible through streamlined certification. Children experiencing homelessness are also known to the State's eligibility system. As such, these children already have case numbers which include mailing addresses (which can include county agencies or shelters). Additionally, information about homeless children covered under the McKinney-Vento Act will be shared within the DPI FRPL data. Since these children are often already known to our system, benefits will be loaded systematically onto existing EBT (QUEST) cards whenever possible. Social Security Numbers (SSNs) are not required as part of Summer EBT eligibility. There will be no impacts to those students who either do not have an SSN. Additionally, as with SNAP recipients in Wisconsin who have disabilities, Summer EBT recipients with disabilities can request to have notices read to them or explained in a different way. To continue, parents of children without internet access can call the Summer EBT hotline with questions. Internet access is not an eligibility factor for Summer EBT, and, as such, Wisconsin will make every effort to provide the same level of service to those without internet access.

*Instructions: Summer EBT agencies are responsible for assisting children who do not live in a permanent dwelling or have a fixed mailing address so they may obtain Summer EBT benefits. This can be accomplished by assisting such households in finding an authorized representative who can act on their behalf, or through other appropriate means. For example, schools have social workers or coordinators for homeless children who may be able to assist these households. Vulnerable populations such as these may need benefits quickly to meet an acute need.*

- 2.8 Describe the claims procedures for cases of erroneous payments in accordance with requirements at [7 CFR 292.27](#).

Wisconsin will limit claims made against households to situations where there is evidence that the household knowingly obtained benefits through fraudulent activities in alignment with 7 CFR § 292.27(c)(2). To limit the risk of unintentional use of any erroneously issued benefits, in the

notices of eligibility determination sent to households being issued benefits, DHS will provide sufficient information to the household about how eligibility is determined, how much in benefits each eligible child is entitled to receive, and information about what to do in the event an incorrect amount of benefits was issued (either an amount too high or too low). When an incorrect issuance is identified, DHS will attempt to recover the incorrectly issued amount if possible/unspent. However, DHS will never reclaim Summer EBT benefits by reducing a household's SNAP or WIC benefit per 7 CFR § 292.27(c)(3).

*Instructions: Summer EBT agencies must develop a process to manage cases of erroneous issuances and pursue claims against a household, as appropriate. Summer EBT agencies have the discretion to determine when to pursue a claim when erroneous issuances are discovered based on cost effectiveness or the individual circumstances. Most children who receive Summer EBT benefits will be enrolled through streamlined certification with no action on the part of the household required. Therefore, a child enrolled through streamlined certification might unknowingly use benefits that were issued in error, including a situation where the child's household applies for duplicate benefits because they are not aware of their automatic enrollment. It may be a significant burden on low-income households to pay back benefits already spent, especially when they were unaware of the error and do not have sufficient funds on hand to pay the claim. To the maximum extent practicable, Summer EBT agencies should limit claims against households to situations where there is evidence that the household knowingly obtained benefits through fraudulent activities. To limit risk of unintentional use of erroneous benefits, Summer EBT agencies have the responsibility to communicate eligibility determinations to households and provide sufficient information for households to determine their eligibility status and the amount they should be issued. In addition, Summer EBT agencies may not reclaim Summer EBT benefits by reducing a household's SNAP or WIC benefit. Summer EBT agencies must also develop a process to allow households to submit a claim for benefits that were not issued or issued in the incorrect amount.*

- 2.9 Describe the plan to ensure that Summer EBT benefits are issued to children based on their eligibility at the end of the instructional year immediately preceding each summer [[7 CFR 292.8\(e\)\(6\)](#); [7 CFR 292.12\(e\)\(2\)](#); [7 CFR 292.12\(f\)\(4\)](#)].

Wisconsin plans to issue benefits to all children who were eligible at some point during the period of eligibility (7/1/2023 through 8/29/2024) unless they are known to be deceased or enrolled in school and receiving a benefit in another State or Indian Tribal Organization. Specifically, **prior to their provision of the FRPL dataset to DHS near the end of the 2023-2024 school year, DPI will review and reconcile the data to ensure that no ineligible or duplicate records are shared with DHS and to ensure that the data is not only comprehensive but that any children known to be deceased or to have unenrolled and permanently moved out of state prior to that point in time have been removed. Additionally, prior to issuance of Summer EBT benefits onto new QUEST cards and issuance of benefits based on an approved Summer EBT application, there will be a DHS-led**

system check to ensure that the QUEST card is only sent to a Wisconsin-based mailing address. Further, there are multiple administrative data sources that will be consulted prior to the issuance of benefits to streamlined certified children that are much more regularly updated than, for instance, DPI's FRPL data from WISE or data shared by non-WISE-reporting districts via the Student Information Portal. Specifically, DCF's Direct Certification data, DCF's data on out-of-home care (OHC) and kinship placements, and the CARES statewide eligibility system will all be checked/matched against in late May/early June (and then again prior to any subsequent issuance) to ensure that benefits are always being issued to the most up-to-date, Wisconsin-based address possible for each eligible child. These steps will ensure that 2024 Summer EBT benefits are issued to children based on their eligibility (and state of residence) as of the end of the 2023-2024 instructional year.

*Instructions: Summer EBT agencies have the responsibility to ensure that all children identified as eligible at any time during the instructional year still reside in the State or ITO at the time benefits are issued. For example, a child who enrolls in school in September and moves to another State in December should not be issued benefits from the State they moved from, even though they were certified for SNAP (or another allowable program) or as FRP eligible in that State in the immediately preceding school year. The child would be streamline certified in the State they moved to in December, or may complete an application if attending an NSLP/SBP school. It would be impractical for Summer EBT agencies to confirm school enrollment at the very end of the school year given the time it takes to pull data and issue cards. However, Summer EBT agencies must still have a plan to confirm that a child has not left the State or service area.*

*Summer EBT agencies can accomplish this by establishing a process for confirming that children identified as eligible earlier in the instructional year are still students within the State or ITO's school system by using other administrative databases such as SNAP rolls. Ideally, this check would occur right before Summer EBT issuance lists are finalized so the most current information is used. In addition, the Notice of Approval that goes to households should include a statement*

*USDA intends to provide flexibility as Summer EBT agencies work to stand up this program. Summer EBT agencies are best positioned to determine a process and timeline that make sense given the individual confines of their program. Summer EBT agencies should include timelines for finalizing data and issuing benefits and should justify why this is reasonable given the requirements of the law.*

### **Section 3: Enrollment and Verification**

#### **3.1 Streamlined Certification [[7 CFR 292.12\(d\)](#)]**

**3.1.a Program data that will be used to enroll children through streamlined certification (check all that apply):**

- NSLP/SBP free and reduced price lists (required)
- SNAP (required)
- TANF (Temporary Assistance for Needy Families) (required if used for Direct Certification in the school meal programs)
- FDIPIR (Food Distribution Program on Indian Reservations) (required if used for Direct Certification in the school meal programs)

- Medicaid data confirming Summer EBT income eligibility (only allowed if participating in the Direct Certification with Medicaid Demonstration projects in the school meal programs – this means the State is approved to use the income information from Medicaid eligibility or enrollment files to assess whether a student is eligible for free or reduced price meals based on household income)
- Other (explain how the income eligibility guidelines for each align with Summer EBT requirements, as well as how each program’s eligibility is determined):

*Instructions: Check each box that corresponds to data you will use to enroll children through streamlined certification. If the ‘other’ box is checked, provide an explanation of this data including a detailed justification for how the program’s eligibility standards and certification processes provide assurance that participating children also meet the eligibility requirements.*

3.1.b Describe how, when, and in what format the Summer EBT agency will obtain data on eligibility determinations made by LEAs (i.e., children certified by schools through an NSLP/SBP application or categorial eligibility). Address specific data needs such as the child’s date of birth, mailing address, and other information required to issue benefits. Address how data confidentiality will be maintained [[7 CFR 292.12\(b\)-\(d\)](#)].

Data containing information about all children who attend NSLP schools that are enrolled to receive free or reduced price meals (via an FRPL application submitted for/during the 2023-2024 school year) will be shared with DHS by DPI. DPI collects this data from public and some private NSLP schools in the state via the WISE data reporting system. DPI will pull a WISE report at the end of May 2024 that will show all FRPL-enrolled students at most NSLP schools and securely and confidentially share it with select representatives at Deloitte and DHS via Sharepoint (a secure file-sharing mechanism). This dataset will include all necessary student-identifying information, such as child’s full name, date of birth, enrolled school/district, grade, gender, primary parent or caretaker full name, and mailing address. This dataset will be cross-checked against all other data sources of eligible children prior to the June 22<sup>nd</sup> issuance to eliminate any duplicates and/or identify any discrepancies that need to be investigated (such as the same student listed in two sources under two different mailing addresses).

Importantly, select NSLP-participating schools/districts in Wisconsin do not use the WISE system to report all necessary student information to DPI. These are commonly (but not exclusively) private schools. These also include certain schools that operate HeadStart programs. For these specific schools, DHS is repurposing its Student Information Portal (originally created for Pandemic EBT). This Portal will be sent to representatives of each of these non-WISE-reporting NSLP school districts in April 2024. The representative will have secure log-in credentials and will be expected to use this Portal to upload information about each of the FRPL-enrolled (and, if applicable, HeadStart-enrolled) students in their schools. The same information shared by DPI in

their file of eligible FRPL-enrolled children (child name, date of birth, school, grade, gender, primary parent/caretaker, mailing address) will be required to be uploaded into the Portal. Representatives of these non-WISE-reporting NSLP districts will upload their student data into the secure Portal by the end of May 2024 so as to allow DHS and Deloitte enough time to eliminate duplicates, address any discrepancies, and include these students in the June 22<sup>nd</sup> major issuance.

*Instructions: Summer EBT agencies will issue benefits to a significant portion of eligible children using data that are already available at the LEA level. To facilitate this, Summer EBT agencies must be able to efficiently collect student eligibility data from all NSLP participating LEAs in a format that has all the necessary elements and can be manipulated for Summer EBT use. This includes data necessary to match and deduplicate records, and complete mailing addresses.*

The [Summer EBT Playbook](#) developed by Code for America and Share our Strength discusses approaches that the Summer EBT agency could employ.

3.1.c For each other data source listed above, describe how, when, and in what format the Summer EBT agency will obtain data sufficient to determine a child's eligibility for Summer EBT. Address specific data needs such as the child's date of birth, mailing address, and other information required to issue benefits. Address how data confidentiality will be maintained [[7 CFR 292.12\(b\)-\(d\)](#)].

#### NSLP/SBP free and reduced price lists:

In late May 2024, DPI will provide a dataset to DHS with all FRPL-enrolled students (students who were individually certified to receive meals via an FRPL application and students directly certified to receive meals) at NSLP WISE-reporting schools from the start of the period of eligibility (7/1/2023) through that point in the 2023-2024 school year. Students who are known to be deceased or to have unenrolled and permanently moved out of state will be removed from this dataset. It will be shared confidentially and securely via Sharepoint with only designated staff having access at each state agency. This dataset will include all necessary student-identifying information, such as full name, date of birth, grade, gender, specific school enrollment information, parent/caretaker name, and mailing address.

Also by late May 2024, for districts with NSLP non-WISE-reporting schools, a designated representative of each will be expected to upload an Excel file into the S-EBT Student Information Portal. The representative will have unique log-in/access credentials in order to securely and confidentially share information about every FRPL-enrolled student at their school(s). Once uploaded into the Portal, DHS and Deloitte will be able to access their eligible student information and export it so that the file format matches that of the files share by DPI and DCF. This information to be uploaded by these districts will include all necessary student-identifying information, such as full name, date of birth, grade,

gender, specific school enrollment information, parent/caretaker name, and mailing address.

SNAP, TANF, FDPIR, and Medicaid enrollment lists:

In late May 2024, DCF will provide a dataset of all Directly Certified students in Wisconsin during the 2023-2024 school year. This dataset will include those who are directly certified due to their enrollment in SNAP, TANF, FDPIR, and/or Medicaid at any point during the 2023-2024 school year. This dataset includes any school-age children categorized as a foster child, homeless, a migrant child, and/or a runaway child. Further, this dataset provided by DCF will not be limited to children who attend NSLP schools; rather, it will be constructed to include any child who was enrolled in one of the aforementioned public assistance programs and meets the State’s definition of school-age (See Section 3.1.d). DHS and DCF have systems in place so that this dataset can be shared automatically (no manual compilation or manipulation of the file is needed). This dataset will include all necessary student-identifying information, such as full name, date of birth, grade, gender, and specific school enrollment information. To ensure all school-age students enrolled in SNAP, TANF, FDPIR, and/or Medicaid in Wisconsin are captured, DHS and Deloitte will also facilitate a data-pull from the CARES statewide eligibility system of all children of compulsory/school-age who were part of a household receiving benefits from one of these programs during the 2023-2024 school year (as well as 1-3 more times throughout the 2024 summer operational period). Prior to every systematic benefit issuance, the CARES data pull and the DCF dataset will be compared and de-duplicated to ensure no duplicate benefits are issued.

*Instructions: Summer EBT agencies will issue benefits to a significant portion of eligible children using only data that are already available at the State or ITO level. To facilitate this, Summer EBT agencies must be able to efficiently collect eligibility data from programs used for direct certification in the NSLP, and any other programs approved by USDA to use for streamlined certification. This data must be sufficient to confirm the child’s income eligibility, match and deduplicate records, and mail cards, as necessary.*

The [Summer EBT Playbook](#) developed by Code for America and Share our Strength discusses approaches that the Summer EBT agency could employ.

3.1.d For the purposes of streamline certifying children without matching to NSLP enrollment provide the State or ITO’s legal ages of compulsory school enrollment [[7 CFR 292.2](#); [7 CFR 292.12\(d\)](#)].

Minimum age: 6 – Children must be at least 6 years of age at some point during the 2024 period of eligibility (7/1/2023 through 8/29/2024). In other words, children must have a date of birth on or before 8/29/2018 to be considered “school-age”. \_\_\_\_\_

Maximum age: 18 – Children must not be more than 18 years of age on or before 7/1/2023 (the start of the 2024 period of eligibility). In other words, children must have a date of birth on or after 7/1/2005 to be considered “school age”. \_\_\_\_\_

*Instructions: The compulsory school age is the ages during which attendance in school is required by State or Tribal law. This should not be confused with the minimum or maximum age to which free education must be offered by a State or ITO. A child must be within that age range and categorically eligible during the Summer EBT Period of Eligibility in order to be eligible for streamlined certification.*

3.1.e Describe the process you will use to compile your issuance list from the data sets used for streamlined certification [[7 CFR 292.12](#)].

As described, several weeks before the June 22<sup>nd</sup> issuance, DHS and Deloitte will receive data about children eligible via streamlined certification from DPI, DCF, the Student Information Portal, and from the CARES statewide eligibility system. Deloitte and DHS have put processes in place so that these datasets will be combined and then rigorously scrutinized.

After combining all datasets into one master list, at a high level, the first phase of this analysis involves identifying and eliminating any duplicate records. As all of the datasets getting combined will include several identifiers (first name, last name, date of birth, gender, etc), it is expected that many duplicates will be easily identified and excluded through this process. In any cases where it is uncertain whether two student entries are duplicates (for example, they have the same first name, last name, date of birth, and gender), these student records will be funneled into a separate spreadsheet for manual investigation by DHS contracted S-EBT staff. This will involve researching each record – including any outreach to agency staff or the household – before making an individual determination as to whether benefits should be issued or not.

Once this first phase of ensuring there is only one ‘row’ in the master dataset per eligible child, then a complex, multi-tiered data matching process will commence through which the State can be sure that these eligible children are being matched to existing cases, when applicable, and that the most appropriate parent/caretaker and mailing address information are being utilized<sup>7</sup>. This step is important in that it is likely an eligible child may have several different mailing addresses associated with them (perhaps one that was submitted by DPI via WISE and another that was available via the CARES eligibility system). As was successfully done throughout P-EBT’s implementation, DHS and Deloitte have designed a hierarchy to help prioritize case matching and mailing address information. This ensures that, to the best of our ability, Summer EBT benefits will be issued to existing CARES cases (and existing QUEST cards) when available and will be issued to the most applicable parent/caretaker and address. This minimizes the need for returned mail, benefits issued to the wrong parent/caretaker, and fair hearings.

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<sup>7</sup> Of specific importance, DHS compares every S-EBT-eligible student record to OHC placement data provided by DCF before any benefits can be issued. This data – collectively referred to as OHC data – is the most up-to-date source for information about where children in these types of living situations are currently placed. This data source is given the top priority in our data matching hierarchy, meaning a match to an address in this dataset will be used instead of an address that, for example, was provided for the same student via the DPI WISE dataset.

*Instructions: The Summer EBT agency must take participation lists from programs approved for*



*streamlined certification and remove duplicate children, as well as children who are not school aged, consistent with the State or ITO's legal ages of compulsory school enrollment. Describe this process. Reminder, children attending NSLP schools do not need to be of compulsory school age to participate in the Program.*

3.1.f Describe the process to encourage and facilitate households to provide updated contact information for the purpose of receiving Summer EBT.

With Deloitte's help, DHS has designed the Benefit Management Tool that will be made publicly available in early March 2024. This tool serves two Summer EBT-specific purposes – it allows households to update their contact information prior to benefits being issued in late June 2024, and it allows households to opt their students out from receiving 2024 Summer EBT benefits if they choose. This Benefit Management Tool will be available online and clearly explains what information is needed, how it will be used, and provides a confirmation post-submission for a household to retain for their records.

Public communications will be created and shared by both DHS and DPI regarding the launch, continued availability, and date by which households are encouraged to use the tool in order to inform the June issuance. These communications will be shared on the DHS Summer EBT webpage, social media accounts for DHS and DPI, shared verbally at stakeholder calls and calls aimed at parents/caretakers, emailed to listservs, and shared with families through school bulletins/communications. Of note, households will also be able to contact the Summer EBT Support Team staff via phone if they need help understanding and/or completing their Benefit Management Tool submission.

Additionally, DHS conducts extensive ongoing outreach to households already receiving SNAP and Medicaid encouraging them to keep their addresses on file up-to-date. For these existing cases, they are and will continue to be encouraged to use SNAP- and Medicaid-specific channels for updating their addresses (and will not necessarily be encouraged to utilize this Summer EBT Benefit Management Tool to do so).

Prior to the June 22<sup>nd</sup> issuance, Deloitte will review all Benefit Management Tool submissions and compare any updated parent/caretaker and mailing address information to the information available via other data sources (like the CARES eligibility system). When appropriate (as determined by DHS), the eligible student's parent/caretaker and/or mailing address information will be updated based on what was submitted via the Benefit Management Tool.

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*Instructions: Summer EBT agencies must establish procedures to allow households to provide updated contact information for the purpose of receiving Summer EBT. This is especially important for households that applied for NSLP benefits with a school meal application. It is not uncommon for households to move during the school year or provide incomplete contact information when enrolling children in school. Allowing households to easily update their contact information before cards are mailed will reduce the number of cards that are returned.*

3.1.g Describe the process for households to confirm eligibility status and unenroll if they do not want to receive benefits [[7 CFR 292.8\(e\)\(11\)\(iii\)](#); [7 CFR 292.12\(b\)\(3\)](#)].

With Deloitte’s help, DHS has designed the Benefit Management Tool that will be made publicly available in early March 2024. This tool serves two Summer EBT-specific purposes – it allows households to update their contact information prior to benefits being issued in late June 2024, and it allows households to opt their students out from receiving 2024 Summer EBT benefits if they choose. This Benefit Management Tool will be available online and clearly explains what information is needed, how it will be used, and provides a confirmation post-submission for a household to retain for their records.

Public communications will be created and shared by both DHS and DPI regarding the launch, continued availability, and date by which households are encouraged to use the tool in order to inform the June issuance. These communications will be shared on the DHS Summer EBT webpage, social media accounts for DHS and DPI, shared verbally at stakeholder calls, emailed to listservs, and shared with families through school bulletins/communications. Of note, households will also be able to contact the Summer EBT Support Team staff via phone if they need help understanding their eligibility status and/or completing their Benefit Management Tool submission. Their eligibility will also be confirmed via the Notices of Eligibility/Enrollment that are sent to every household with at least one child receiving benefits.

In addition, language will be included in Notices of Eligibility/Enrollment about how to opt out and, more specifically, that a household should contact the Summer EBT Support Team if they have already been issued benefits that they do not want.

In all areas, it will be clearly communicated that the decision to opt out a student from receiving Summer EBT in 2024 is only applicable for the 2024 year. If that student continues to be eligible in future years and the household does not wish to receive benefits in those future years, they will need to opt out again. This stipulation was put in place because it is likely that the opt-out process and applicable platforms (like the Benefit Management Tool) will change from 2024 to 2025 once more permanent resources are developed.

As an additional avenue of communicating about the opt-out option, verbiage about opting out and a link to the Benefit Management Tool has been included in FRPL approval letters sent to families from DPI throughout the 2023-2024 school year. This means that any family whose student became or becomes approved to receive free or reduced price meals via FRPL application this year (and, therefore, who would be streamlined certified to receive S-EBT benefits in 2024) will be provided with a way to opt out of also receiving S-EBT in 2024 if they choose.

Prior to the June 22<sup>nd</sup> issuance and all subsequent issuances, Deloitte will review all Benefit Management Tool submissions and remove from the master list of eligible students anyone who has been opted out.

*Instructions: Summer EBT agencies must develop a process to enable anyone who has been determined to be eligible for Summer EBT benefits to see that they are eligible and unenroll, or opt-out, of the Program if they prefer. This must be included in notice of eligibility and enrollment.*

*Children from households which notify the Summer EBT agency that they do not want Summer EBT benefits should not be issued benefits, or must have their benefits discontinued as soon as possible, if already issued. If a Summer EBT agency is not able to stand up an opt-out system in the immediate term, the agency may work with their RO to implement flexibilities for 2024, such as directing households that do not want to participate to destroy their Summer EBT cards. Any notification from the household declining benefits must be documented and maintained on file, as required under 7 CFR 292.23, to substantiate any change in benefits. Households that opt out of the Program may contact their Summer EBT agency at any time before the end of the summer operational period to request reenrollment.*

### 3.2 Applications [[7 CFR 292.8\(e\)\(7\)](#)]

3.2.a For 2024, Summer EBT applications will be processed by (choose one) [[7 CFR 292.13](#)]:

- The Summer EBT agency
- LEAs
- The Summer EBT agency and LEAs

*Instructions: Summer EBT applications are ultimately the Summer EBT agency's responsibility. Recognizing that Summer EBT agencies may need operational flexibilities as they launch their*

*programs, in Summer 2024 only, Summer EBT agencies may delegate (i.e., assign) activities related to Summer EBT applications to LEAs, but the Summer EBT agencies must pay for new costs associated with processing Summer EBT applications. For example, if a Summer EBT agency needs a large LEA to collect applications for Summer EBT in 2024, the Summer EBT agency may delegate application activities to the LEA and cover all costs associated with Summer EBT activity. Summer EBT agencies do not need to cover LEA costs already associated with alternative applications not used for Summer EBT purposes. In Summer 2025 and beyond, Summer EBT agencies may enter into contracts or other similar arrangements with LEAs to process applications, but they cannot compel them to do so. See [Summer EBT Questions & Answers #17 & 18](#) for more information.*

3.2.b Will alternative income applications be used in 2024?

Yes

No

If yes, initial here to attest that the alternative applications collect enough information to determine program eligibility.

In Wisconsin, CEP schools are accustomed to soliciting alternative income applications from their families as well as processing and reporting information gleaned from these applications within the WISE reporting system. Wisconsin's existing alternative income application, when collected, contains sufficient information to also determine Summer EBT program eligibility. Specifically, each alternative income application is reviewed by the receiving CEP school, and any students included are marked as "Economically Disadvantaged" if applicable. DPI has attested that this "Economically Disadvantaged" designation indicates that the student's household meets the income criteria for FRPL eligibility. Existing processes include CEP schools then reporting this information received via alternative income applications within WISE. As such, when DPI performs their end-of-school-year data pull across all WISE-reporting schools (including CEP schools), the resulting dataset will include CEP students who turned in an alternative income application and who satisfy the income criteria for FRPL enrollment. As described, this dataset is shared with DHS for the purposes of identifying and issuing benefits to all Summer EBT-eligible children across the state.

While alternative income applications will be used in 2024 to identify (and 'streamline certify') additional eligible students in Wisconsin, they will serve as a complement (not replacement) to the Summer EBT application (See Section 3.2.c for more information on the S-EBT Application). That said, Wisconsin expects the leveraging of alternative income applications in 2024 to significantly increase the number of children who can be streamlined certified and significantly reduce the number of children who need to complete an S-EBT Application to receive benefits.

*Instructions: During summer 2024, alternative income applications that are currently used in some NSLP special provision schools may be used to confer eligibility if they allow a Summer EBT agency to determine whether the household is at or below NSLP/SBP reduced price income threshold. States, ITOs, and LEAs may use their alternative income applications for Summer EBT in 2024 or make a Summer EBT application available for children, which could be the USDA prototype application.*

*Alternative income applications refers to forms that are used to determine household income for programs or reasons other than USDA programs. These forms are used by some LEAs to collect information at their special provision schools that would have otherwise been collected through NSLP/SBP applications on an annual basis. These applications may also be referred to as “family income surveys” or “household income data forms.” Data collected through alternative income applications are used for purposes not related to the school meal programs, such as determining education funding allocations, and other student benefits. It is the responsibility of the Summer EBT agency to ensure that alternative income applications meet the requirements for 2024.*

See [Summer EBT Questions & Answers #19](#) for more information.

3.2.c Describe the data and processes used to confirm that an applicant for Summer EBT is enrolled at an NSLP/SBP school and that they are not issued duplicate benefits through the streamlined certification [[7 CFR 292.8\(e\)\(7\)](#), [7 CFR 292.12\(e\)\(2\)](#)].

#### S-EBT Application Overview:

DHS has partnered with Deloitte to revamp an online application platform used during early 2023 for Pandemic EBT purposes. This application has been updated to meet all stated FNS requirements for Summer EBT in 2024 regarding the identification of students eligible for Summer EBT benefits. Specifically, this application allows a parent/caretaker to provide identity and income information about themselves and all other adults and children in their household. For each child in the household, it allows the parent/caretaker to specify information about their NSLP/SBP school enrollment in the 2023-2024 school year. Finally, the application includes an attestation section wherein the parent/caretaker must attest that all information provided in the application is true, that all income has been accurately reported, that their household has not received Summer EBT benefits from any other State, Territory, or ITO for 2024, and that they authorize DHS and other State agencies to use the information provided for verification purposes.

#### S-EBT Application Process (Explained):

- DHS will oversee and maintain the S-EBT Application platform for 2024
  - o Both DHS and DPI will be promoting the availability of the S-EBT application via multiple communications platforms (i.e. websites, social media, school bulletins, etc)
  - o A paper version of the S-EBT Application will be made available upon request

- Households will also be able to contact the Summer EBT Support Team staff via phone if they need help understanding and/or completing the S-EBT Application
- Applications submitted will come to DHS for the first round of review
  - DHS will confirm that all necessary/satisfactory information was provided for the student(s) included in the application, including that the family attests to a household income level that is at or below the required threshold for their household size<sup>8</sup> and checking that the students are not otherwise eligible for Summer EBT benefits via streamlined certification (including checking to ensure the student(s) on the application has not already received Summer EBT benefits in Wisconsin in 2024).
  - DHS will securely transfer a file<sup>9</sup> once per week to DPI that includes all students who applied and who satisfy this first round of review
- DPI will conduct the second round of review
  - DPI will verify whether each student shared by DHS is on file as being/having been enrolled in the claimed NSLP school during the 2023-2024 school year
  - DPI will then securely transfer a file back to DHS clearly listing which students are verified/approved and which are not
- DHS will conduct the final processing/data matching and issuance steps
  - Applications will be matched against the same administrative data sources as streamlined certified students (including, for example, the DCF Direct Certification data) prior to any benefit issuance
  - For complete applications that are submitted on or before May 1<sup>st</sup>, 2024, if determined eligible through this application review process, that the student will be issued benefits on June 22<sup>nd</sup> (and will be put through the same data reconciliation and matching steps as all other streamlined certified students and to ensure no duplicate benefits are issued).
  - For completed applications that are submitted between May 2, 2024 and June 27<sup>th</sup>, 2024, if eligible, the student will be issued benefits within 15 operational days after June 27<sup>th</sup> (and will be put through the same data reconciliation and matching steps as all other streamlined certified students and to ensure no duplicate benefits are issued).
  - For completed applications that are submitted after June 27<sup>th</sup>, 2024, if eligible, the student will receive benefits within 15 operational days of the date of their received completed application (and will be put through the same data reconciliation and matching steps as all other streamlined certified students and to ensure no duplicate benefits are issued).

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<sup>8</sup> Per the [FNS IFR](#), if an application is received prior to July 1<sup>st</sup> of each year, the prior year's income threshold for free or reduced meal receipt will be used. Conversely, review of any application received on or after July 1<sup>st</sup> of a given summer will be based on the next year's income threshold. For example, an application received on June 15, 2024 will be evaluated based on the 2023-2024 school year income threshold whereas an application received on July 15, 2024 will be evaluated based on the 2024-2025 school year income threshold.

<sup>9</sup> Will utilize Sharepoint – same secure file sharing mechanism that DHS and DPI utilized for Pandemic EBT in the 2022-2023 school year and summer of 2023.

*Instructions: Summer EBT agencies must be able to confirm whether children on applications are enrolled in NSLP/SBP-participating schools within the State or ITO service area, as applicable, for the purposes of certifying children for Summer EBT benefits and detecting and preventing duplicate benefit issuance for children that were already certified through streamlined certification.*

*Summer EBT agencies must ensure the confidentiality of all such data, and the data must be used only for the purposes of the Summer EBT Program, or to provide other social service benefits to eligible children.*

*State Summer EBT agencies must make this data available to ITO Summer EBT agencies for children within an ITO's Summer EBT service area, in a timeframe that allows ITO Summer EBT agencies to issue timely benefits. ITO Summer EBT agencies must ensure confidentiality of the data. Procedures to share data will be included in any State-ITO agreement.*

3.2.d Describe how data confidentiality will be maintained [[7 CFR 292.12\(c\)\(2\)](#)].

Select, designated representatives of DHS, DPI, and Deloitte will be given secure access to Summer EBT student data. These representatives will be tasked with ensuring that all student information is handled in a confidential, secure manner and is only accessed for the purposes of determining Summer EBT eligibility and benefit issuance. This group will also work to ensure that no dual participation occurs. There are no Wisconsin-based ITOs also operating a Summer EBT program in 2024.

*Instructions: The Summer EBT agency must ensure the confidentiality of all student data exchanged that is applicable to Summer EBT program eligibility and dual participation; and data must only be used for SEBT program purposes (c)(2), or for the purpose of use or disclosure to provide other social service benefits to eligible children, in accordance with 7 CFR 292.12(c)(2). In addition, student data may only be shared with persons authorized to receive eligibility information consistent with § 292.13(o).*

3.3 Verification of Summer EBT applications [[7 CFR 292.8\(e\)\(7\)](#)]

3.3.a For 2024, the following types of verification will be implemented [[7 CFR 292.14](#)]:

- Verification for cause (required) [[7 CFR 292.14\(a\)\(1\)](#)]
- Direct verification of selected applications (required) [[7 CFR 292.14\(e\)](#)]
- 3% random sample [[7 CFR 292.14\(a\)\(2\)](#)]
- Alternative verification procedure [[7 CFR 292.14\(a\)\(3\)](#)] (if selected, please describe below):

*Instructions: Verifying officials (i.e., staff that participate in verification activities) do not need to complete verification for all applications. Summer EBT applications will be subject to verification for cause in 2024, a process through which questionable applications are verified on a case-by-case basis. Any application selected for cause must first be directly certified before the household is contacted to request documentation. An additional 3% sample (or proposed alternative procedure) is not required in 2024. However, if you intend to implement a verification procedure beyond verification for cause and direct verification, please indicate that and describe in detail, as applicable.*

*NOTE: NSLP applications that are used to confer Summer EBT eligibility are not subject to Summer EBT verification requirements. However, they are subject to regular NSLP verification procedures, even if the household only applied for NSLP in order to get Summer EBT benefits.*

3.3.b For 2024, Summer EBT applications will be verified by (choose one) [[7 CFR 292.14](#)]:

- The Summer EBT agency
- LEAs
- The Summer EBT agency and LEAs

*Instructions: Summer EBT applications are ultimately the Summer EBT agency's responsibility. Recognizing that Summer EBT agencies may need operational flexibilities as they launch their programs, in Summer 2024 only, Summer EBT agencies may delegate (i.e., assign) activities related to Summer EBT applications to LEAs, including verification, but the Summer EBT agencies must pay for all new costs associated with verification. For example, if a Summer EBT agency needs a large LEA to verify applications for Summer EBT in 2024, the Summer EBT agency may delegate verification activities to the LEA and cover all costs associated with Summer EBT verification. In Summer 2025 and beyond, Summer EBT agencies may enter into contracts or other similar arrangements with LEAs to process applications and conduct verification, but they cannot compel them to do so.*

3.3.c For Direct Verification purposes, Program data that will be used to verify selected applications *prior* to contacting a household include (check all that apply) [[7 CFR 292.14\(e\)](#)]:

- NSLP/SBP free and reduced price lists
- SNAP
- TANF (Temporary Assistance for Needy Families)
- FDPIR (Food Distribution Program on Indian Reservations)
- Medicaid (only allowed if participating in the Direct Certification with Medicaid Demonstration projects in the school meal programs)
- Other:

## Section 4: Data Sharing and Preventing Dual Participation

- 4.1 Provide plans to coordinate among ITO Summer EBT Program(s) and/or State Summer EBT Program(s), as applicable [[7 CFR 292.8\(e\)\(8\)](#), [7 CFR 292.9](#)].

At the time of the POM submission, the State is not aware of any Wisconsin-based ITOs planning to operate a Summer EBT program in 2024. Should that change, the State is committed to coordinating with the ITO(s) to the maximum extent practicable and in accordance with the IFR requirements to prevent dual participation and ensure the seamless, timely administration of all Summer EBT programs.

*Instructions: State and ITO-operated Summer EBT programs serving proximate areas must coordinate and communicate to ensure efficient and timely service to eligible individuals and prevent duplicative issuance of benefits. If the geographic State is not operating a Summer EBT Program in 2024, the ITO will coordinate with the State's designee. If an ITO's service area crosses geographic State boundaries, the ITO and each applicable Summer EBT agency, or designee of a State covering the geographic area(s) served by the ITO, must coordinate services. FNS regional offices will facilitate discussions and information sharing between States and ITOs, as appropriate.*

***ITO Summer EBT agencies will receive priority consideration to serve eligible children within their service area, as identified in an FNS-approved POM. This means that children from the ITO's service area who can be enrolled through streamlined certification will automatically be enrolled in the ITO-administered Summer EBT Program, to the maximum extent practicable. However, children from ITO service areas may opt to participate in the State-operated program and opt out of the ITO-operated program if they so choose.***

*State Summer EBT agencies must:*

- *Share student data with the ITO, including student eligibility status and contact information of children deemed eligible within the ITO's service area.*
- *Provide information in a manner and timeframe that will allow the ITO Summer EBT agency to issue benefits timely.*
- *Ensure the confidentiality of all Program-related student data used to determine Program eligibility and prevent dual participation.*

*ITO Summer EBT agencies and the State Summer EBT agencies serving proximate areas must:*

- *Ensure the coordination of Summer EBT program services, which may include a written agreement between both parties.*
- *Notify eligible children or households that they may choose to receive Summer EBT program benefits from either the State or the ITO Summer EBT agency.*
- *Provide referral information to the alternative program upon a child or household's request, thereby facilitating household choice.*



4.2 Provide procedures to detect and prevent dual participation [[7 CFR 292.8\(e\)\(9\)](#); [7 CFR 292.9\(b\)\(3\)](#); [7 CFR 292.12\(c\)](#); [7 CFR 292.12\(f\)\(4\)](#); [7 CFR 292.15\(d\)](#)], which includes:

- A child simultaneously receiving benefits from more than one State or ITO-administered Summer EBT program or,
- A child simultaneously receiving multiple allotments from the same State or ITO-administered Summer EBT program.

The Notices of Approval/Eligibility sent to households with eligible children will contain a statement clarifying that a child may not be issued Summer EBT benefits from more than one Summer EBT program in Wisconsin in 2024, more than one time from the same program in Wisconsin in 2024 (amounting to more than \$120 per eligible child), or from more than one State in 2024. The Summer EBT application's attestation section also includes a statement through which the applicant must certify that they have not already received Summer EBT benefits from any other State-run or ITO-run program for the 2024 summer.

To prevent dual participation, as described in Section 3.1.e of this POM, a rigorous data reconciliation process takes place before each issuance of Summer EBT benefits. Each eligible child is compared against the list of children who have already received Summer EBT benefits via the State-run Summer EBT program to ensure no duplication. Each eligible child is also compared against all data sources containing eligible children (DPI dataset, DCF Direct Certification dataset, Student Information Portal dataset containing info from non-WISE-reporting schools and approved Summer EBT applications) to ensure a child has not already been accounted for through a different source of available data. DHS intends to build off of its success through the years of P-EBT implementation, during which it saw increasingly lowered instances of dual participation year after year (per the below definition). Should any instances of dual participation come to the State's attention, they will be investigated swiftly and thoroughly as well as reported to USDA as needed.

*Instructions: Dual participation means a child simultaneously receiving benefits from more than one State or ITO-administered Summer EBT program, or simultaneously receiving multiple allotments from the same State or ITO-administered Summer EBT program. Relatedly, duplicate benefit issuance includes situations where the Summer EBT agency allows an eligible household to dual participate. For example, a child who moves in the spring may not receive a benefit from both the State they left and from the State to which they moved. Likewise, a child living within an ITO Summer EBT agency's service area may not receive benefits from the ITO-administered program and a State-administered program that operates in a proximate geographic area, nor may they receive benefits from two ITO-administered programs.*

*State and ITO Summer EBT agencies must work together to prevent dual participation, particularly in State border areas and around ITO service areas and must establish detection and prevention procedures in their POMs. Summer EBT agencies could choose to adapt systems already in place for their counterpart SNAP or WIC program, or propose an alternative approach.*

*In addition, a participant's notice of approval must include a statement communicating that households that are erroneously issued duplicate benefits from more than one State or ITO*

*should only use benefits from the State or ITO where their child(ren) completed the instructional year immediately preceding the summer operational period. Under no circumstances may they use both, which would be dual participation. A State or ITO-level database could be used to detect and prevent duplicate benefit issuance and increase data integrity across the Summer EBT program.*

## **Section 5: Customer Service Plan**

- 5.1 Provide a customer service plan that includes [\[7 CFR 292.8\(e\)\(11\); 7 CFR 292.15\(g\)\]](#):
- a. A single point of contact for all customer service information and inquiries including a hotline and website;
  - b. A plan to inform eligible households of the availability of Program benefits and the process to apply for benefits, if necessary; and
  - c. A simplified process for households to opt out of the program.

DHS's Summer EBT Support Team will serve as the primary point of contact for households and other stakeholders with questions about the Summer EBT program. This Team will manage a dedicated call center, phone number, and email account for Summer EBT (phone number and email account TBA). The call center will only actively take calls during stated business hours, but the dedicated call center will allow for callers to leave voicemail messages, even during non-business hours.

Regarding the overall public communication plan for Summer EBT, communications will be created by DHS and DPI in 2024 and shared by both agencies, when applicable, via multiple channels (stakeholder calls/webinars, school bulletins, school superintendents, GovD listservs, agency websites/social media accounts, etc). The communications to be created/published include but are not limited to:

- Communications (beginning in early spring of 2024) through existing school/SFA channels introducing/explaining the Summer EBT program (will potentially utilize new FNS program branding)
- Custom mailer with Summer EBT-specific information sent with new QUEST cards issued
- Notice of Eligibility/Benefit Issuance (including how eligibility was determined, where benefits can be used, what can be purchased with them, penalties for misuse of benefits, opt-out information, etc)
- Notice of Upcoming Expungement (will be mailed at 60 days post-issuance to any household with a non-zero balance at that time, will contain information about the upcoming removal date for any remaining balance of S-EBT benefits)
- Notice of S-EBT application denial via regular review (including reason for ineligibility and appeal/fair hearing information)
- Notice of S-EBT application denial via direct verification following the need for verification for cause (including reason for ineligibility and appeal/fair hearing information)

- Notice (and follow-up attempts) to households who submitted an S-EBT application and have been pulled due to verification for cause (sent after direct verification has been attempted and was inconclusive or unsuccessful) – includes instructions regarding the documentation/information that needs to be submitted and by when
- Resources for schools and partner organizations to use to explain the S-EBT program and promote the S-EBT application and Benefit Management Tool
- Written manual and video to explain how to properly use the Student Information Portal for SFAs that do not report data to DPI WISE
- Email reminders to SFAs that do not report data to DPI WISE regarding the Student information Portal
- Public-facing GovD emails to subscribers/partners announcing:
  - Launch of the Summer EBT program for 2024
  - Launch of S-EBT Application and Benefit Management Tool
  - Upcoming cut-off date (May 1, 2024) for use of S-EBT Application and Benefit Management Tool (to be included in June 2024 issuance)
  - Systematic issuance on June 22<sup>nd</sup>, 2024
  - Deadlines for use of S-EBT Application and Benefit Management Tool as well as deadline for submitting appeal/fair hearing requests near end of summer operational period

*Instructions: Although Summer EBT Program implementation will be a partnership between agencies in most cases, Summer EBT must be a unified program from the perspective of participants. Summer EBT customer service plans must include a single point of contact for all customer service information and inquiries and must include a telephone hotline and website. In addition, the customer service plan must communicate how households can opt out of participating in the Program.*

*Because Summer EBT is a new program, stakeholders at all levels need information that clearly explains what the Program is, who is eligible, and how benefits can be accessed and redeemed. Summer EBT agencies will need to provide information to clarify differences between Summer EBT and PEBT.*

*Summer EBT agencies must provide written materials to each household prior to Summer EBT issuance and as needed during ongoing operation of the Summer EBT Program. At a minimum, the household materials must provide information including, but not limited to: where benefits can be used, what foods are eligible for purchase, unallowable uses of benefits and penalties for misuse, use of security Personal Identification Numbers (PINs), how families may access customer service supports during non-business hours, the eligibility criteria for benefits, disclosure information regarding adjustments and a household's rights to notice, fair hearings, and provisional credits, and must include the USDA statement of non-discrimination and be prepared at an educational reading level suitable for participant households. These standards are a minimum, and USDA highly encourages Summer EBT agencies to maintain more frequent contact with eligible households to ensure they have the information they need to access program benefits. Examples include providing information through the schools before the end of*

*the school year, robo-calls and texts to families to remind them that they have benefits available to spend, and social media ads. Summer EBT agencies should consider how they can incorporate outreach throughout the summer period in a manner that is inclusive of individuals with disabilities or limited English proficiency, and people who are unhoused, or generally are not well connected with community services or media.*

## **Section 6: Program Violations**

- 6.1 Provide a plan for timely and effective action against program violators [[7 CFR 292.8\(e\)\(4\)](#), [7 CFR 292.25](#)].

Similar processes used for SNAP and Pandemic EBT intentional program violations will be put in place for Summer EBT violations. All instance of intentional program violation will be promptly investigated, and, if/when confirmed, will be acted on as immediately as is practicable. DHS will maintain on file all evidence relating to such investigations and actions and will inform the FNS Midwest Regional Office of any suspected fraud or criminal abuse which would result in a loss or misuse of federal funds.

*Instructions: The Summer EBT agency must promptly investigate complaints received or irregularities noted in connection with the operation of the Program and must take appropriate action to correct any irregularities including, but not limited to, disqualification and claims. As Summer EBT adapts aspects of WIC, SNAP, and Child Nutrition Programs, some program violations will be similar to violations seen in these programs, and may benefit from similar processes.*

- 6.2 Attach a copy of the Summer EBT agency's fair hearing procedures for participants [[7 CFR 292.8\(e\)\(12\)](#), [7 CFR 292.26](#)].

*Instructions: See regulations at [7 CFR 292.26](#) for complete hearing requirements to help complete this requirement.*

## **Section 7: Indian Tribal Organizations**

In addition to Sections 1-6, provide the below information if you are an ITO administering the Summer EBT program.

### **Required Attachments:**

- A map or other visual reference aid of the service area of the ITO, including a description of any areas beyond the ITO's jurisdiction that the ITO proposes to serve [[7 CFR 292.8\(f\)\(1\)](#)].

*Instructions:* ITO service area means the geographic area served by an ITO Summer EBT agency. In WIC, ITO service areas have typically included reservations, or specific Tribal lands in Oklahoma. FNS expects that ITOs will continue to use existing Tribal service areas for the purposes of Summer EBT. However, if an ITO proposes to serve children in areas beyond typical WIC or FDPIR service areas, potentially including other Tribal areas, the ITO must indicate the modified service area, as appropriate and only applicable to Summer EBT. The map or visual reference should include a description of any Tribal areas outside of the ITO's typical jurisdiction (e.g., other Tribal areas) that they propose to serve, if applicable. Please note, if an ITO's service area crosses geographic State boundaries, the ITO and each applicable State Summer EBT agency, or designee of a State covering the geographic area(s) served by the ITO, must coordinate services.

- 7.1 A plan and procedures to enroll children already deemed eligible by a State Summer EBT agency serving the same geographic area, without further application [[7 CFR 292.8\(f\)\(2\)](#)].

*Instructions:* The State Summer EBT agency must share data, including household contact information, indicating those individuals deemed eligible in the ITO Summer EBT agency's service area in a manner and timeframe that will allow the ITO Summer EBT agency to issue program benefits timely. The ITO Summer EBT agency must receive priority consideration to serve eligible individuals within its service area. Please indicate the ITO Summer EBT agency's plans to work with the State Summer EBT agency to obtain necessary data, including reference to any informal or formal discussions or agreements on-topic.

- 7.2 A plan and procedures to determine eligibility for and enroll children who must apply through the ITO Summer EBT agency to receive benefits because they have not already been identified as eligible (i.e., via streamlined certification or the State Summer EBT agency) [[7 CFR 292.8\(f\)\(3\)](#)].

*Instructions:* Summer EBT agencies must enroll eligible children in Summer EBT if it is determined that they meet the requirements to receive free or reduced-price meals, as determined through a complete Summer EBT application. The ITO Summer EBT agency must use the eligibility criteria under [7 CFR 292.6](#). The Summer EBT agency will need a plan to develop, distribute, collect, and process Summer EBT applications consistent with the Summer EBT standards. Describe this process, why it is appropriate and accessible for the population served, and how the Summer EBT agency will ensure integrity throughout.

7.3 A description of the benefit delivery model to be used including how the benefit issued will be equal to or not exceed \$120 for summer 2024. The ITO Summer EBT agency must use the same benefit model for all participants throughout its service area [[7 CFR 292.8\(f\)\(4\)](#); [7 CFR 292.19\(a\)](#)]. Select one:

- Cash-value benefit model (CVB). Describe: \_\_\_\_\_
- Food package model. Describe, including a chart or table detailing the types and quantities of foods which can be purchased with Summer EBT benefit, as well as the average cost of each within the ITO service area: \_\_\_\_\_
- Combination of CVB and food package. Describe: \_\_\_\_\_
- Alternative benefit delivery model. Describe: \_\_\_\_\_

*Instructions: SEA instructions: An ITO Summer EBT agency's POM must include a description of the benefit delivery model to be used (i.e., a cash-value benefit (CVB) model, a food package model, a combination of the two, or an alternate model) and must also provide the list of supplemental foods which participants can purchase upon enrollment in the Summer EBT Program. ITOs should explain their model and why it is appropriate for their participants.*

*ITOs using a CVB-only benefit delivery model must issue a benefit level equal to \$120 per summer in 2024. For ITOs using a food package benefit delivery model, a combination CVB and food package benefit delivery model, or an alternate benefit delivery model, the benefit level cannot exceed \$120 per summer at the time of initial submission of the POM.*

*ITOs proposing to use a food package or similar model should include a chart or table detailing the types and quantities of foods which can be purchased with Summer EBT benefits, as well as the average cost of each within the ITO service area, to establish that the value of the package does not exceed \$120 per summer. Although, prices for individual items may vary over time or by retailer, ITO Summer EBT agencies will not be required to cover the difference when a child's food costs exceed \$120/summer at the point of sale, provided that the child's purchases follow the ITO's approved food package. Accordingly, it is important that ITOs provide FNS detailed information on their proposed package and average costs within the ITO service area so that the estimated cost of the food package is as accurate as possible.*

7.4 A list of supplemental foods for which participants can transact upon enrollment, excluding infant formula and infant foods [[7 CFR 292.8\(f\)\(5\)](#); [7 CFR 292.19\(a\)\(3\)](#)].

*Instructions: Specifications for supplemental foods are included in [7 CFR 292.19\(a\)\(3\)](#). Supplemental foods mean, for the purposes of Summer EBT, foods:*

*(1) containing nutrients determined by nutritional research to be lacking in the diets of children; and*

*(2) promoting the health of the population served by the program under this section, as indicated by relevant nutrition science, public health concerns, and cultural eating patterns, as determined by FNS; and*

*(3) Supplemental foods authorized for the WIC Program by the applicable WIC ITO meet the requirements set forth in this subparagraph, excluding infant foods and infant formula.*

*The ITO Summer EBT agency does not need to provide its entire WIC product list for Summer EBT or use the same foods in the Summer EBT Program as the WIC Program. However, the ITO should indicate what WIC foods will be allowed in Summer EBT, describe any additional foods not included on the WIC product list that will be offered for Summer EBT.*

7.5 Requirements for vendors to transact and redeem Summer EBT Program benefits [[7 CFR 292.8\(f\)\(6\)](#); [7 CFR 292.19\(a\)](#)]. Check each of the following to verify compliance:

- Only vendors authorized by the ITO to accept WIC benefits will be eligible to enroll in the ITO's Summer EBT Program.
- Only vendors that can accept the ITO-defined benefit, as identified in the POM and subject to FNS approval, will be eligible to enroll in the ITO's Summer EBT Program.
- Enrolled vendors will only provide foods from the ITO-submitted, approved foods list.
- Enrolled vendors will charge prices for eligible food items which are reasonable for the area(s) served and are at the current price or less than the current price charged to other customers.

*Instructions: As a prerequisite, vendors must be approved for participation in the ITO's WIC Program in order to participate in their Summer EBT Program. The ITO Summer EBT agency must attest that it will comply with the required vendor standards by checking the boxes listed in this section.*

7.6 A plan for providing technical assistance and training to vendors enrolled to transact and redeem Summer EBT program benefits [[7 CFR 292.8\(f\)\(7\)](#)].

*Instructions: Because WIC vendors are authorized by WIC agencies, the ITO Summer EBT agency must support and monitor enrolled Summer EBT program vendors so they are able to support Summer EBT purchases. Summer EBT agencies should, at a minimum, address how they will inform vendors about Summer EBT, train vendors to recognize and accept the benefit, train vendors to offer enough authorized supplemental foods to meet demand, and provide technical assistance, as needed.*

7.7 Provide a plan for enrolling vendors, including how the ITO Summer EBT agency will seek out such vendors for participation in the Program [[7 CFR 292.19\(c\)](#)].

*Instructions: As a prerequisite, vendors must be approved for participation in the ITO’s WIC Program in order to participate in their Summer EBT Program. The ITO Summer EBT agency must describe how it will enroll and hold vendors in the Summer EBT Program.*

7.8 Provide a plan for vendor integrity and monitoring. Describe how vendors that will be held accountable to meet all other applicable vendor-specific program requirements in [7 CFR 292.19](#), as well as any additional requirements set by the ITO Summer EBT agency which are consistent with regulation [[7 CFR 292.19\(c\)](#)].

*Instructions: The ITO Summer EBT agency must set forth a system which ensures:*

- *Requirements and restrictions on the participation of vendors and the transaction of food benefits described at [7 CFR 246.12](#) apply to activities involving Summer EBT benefits; and*
- *Vendors are subject to the actions and penalties described at [7 CFR 246.12](#) of this chapter for noncompliance or violations involving Summer EBT benefits; and*
- *The standards for determination and disposition of claims against vendors described at [7 CFR 246.12](#) of this chapter apply to Summer EBT benefits;*  
*-- or --*
- *Set forth an alternate system to ensure effective vendor management and vendor integrity.*

**Summer EBT Agency Signatures**

COORDINATING AGENCY (DHS)	PARTNERING AGENCY (DPI)
By (Signature) 	By (Signature) 
Title Director Bureau of Eligibility Operations and Training Division of Medicaid Services	Title Assistant State Superintendent, Division for Finance and Management
Date 02/13/2024	Date 2/13/2024