

Documenting P-EBT Implementation Wisconsin Case Study

Overview

Wisconsin overcame substantial challenges to implement Pandemic Electronic Benefits Transfer (P-EBT), thanks to extraordinary dedication from state agency staff and community partners. Wisconsin successfully issued P-EBT benefits to approximately 80% of eligible children by September 30.¹ One major success was the leveraging of enrollment information from other assistance programs to directly issue P-EBT benefits to three-fourths of eligible children. The application process was more challenging than direct issuance in Wisconsin and reached fewer children.



"I am grateful. The money from P-EBT put more food in my house that we needed with the kids home all day. They would eat the doors off the refrigerator if they could."

– Mother of 3 teenagers in Wisconsin

State Context

The P-EBT program required a coordinated partnership between the Wisconsin Department of Health Services (DHS), the Department of Children and Families (DCF), and the Division of School Nutrition at the Department of Public Instruction (DPI). DHS oversees the Supplemental Nutrition Assistance Program (SNAP) and Medicaid. DCF oversees Temporary Assistance for Needy Families (TANF), Foster Care, and Homeless/Migrant Services, as well as the direct certification process for free and reduced-price (F/RP) school meals from these programs.² DPI directly oversees the National School Lunch Program and maintains data on all children

¹ Data provided by DHS showed P-EBT benefits issued to 350,612 out of an estimated 438,375 eligible children, or 79.98%.

² Direct certification is the process by which eligible children are certified for free meals without the need for a household application based on participation in one or more means-tested Federal assistance program(s). Wisconsin had a 99% direct certification rate in FNS's most recent study. See "Direct Certification in the National School Lunch Program: School Year 2015-2016 and 2016-2017." October 2018. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/NSLPDirectCertification2016.pdf>.

approved to receive F/RP school meals. While DCF's data was an important part of Wisconsin's P-EBT plan design, DHS and DPI were primarily responsible for P-EBT implementation.

Implementation Overview

Plan Design and Approval from Food and Nutrition Services (FNS)

Wisconsin's plan received FNS approval on April 22, 2020, making it one of the earliest states permitted to move forward with implementation. State leaders struggled with the lack of FNS guidance in late March and early April as they were making key design decisions. Some of the state's critical, unanswered questions related to internal controls, such as how FNS was going to define "verification of eligibility" (which was ultimately addressed in FNS's April 15 Question and Answer document) and whether FNS had any expectation of future benefit recoupment if underlying data on student eligibility was flawed (which was not addressed in publicly available guidance). State officials reported that implementation challenges resulted from a lack of clear and timely federal guidance on these and other questions.

In Wisconsin's approved P-EBT plan, the state anticipated serving 96,000 SNAP households and 117,000 non-SNAP households with children, reaching 438,000 children overall.³ The maximum P-EBT benefit was calculated to be \$324.90 (\$5.70 per day multiplied by 57 days). Wisconsin anticipated issuing \$142 million in P-EBT benefits to Wisconsin children if all eligible children participated.



"We didn't get timely responses from FNS to help us as we pulled this together, so we had to use our best judgment."

– Wisconsin SNAP official

Issuance Method

Wisconsin sought to directly issue P-EBT benefits to as many children as possible by leveraging the state's robust direct certification process that includes SNAP, TANF, Medicaid, Foster Care, and Homeless/Migrant Services. This was done by linking three separate databases from DHS, DPI, and DCF that each held different pieces of information needed to create a complete data set of children directly certified for F/RP meals with enough information to directly issue P-EBT cards. This linked dataset allowed

³ FNS Approval of Wisconsin State Plan, April 22, 2020. Available at: <https://fns-prod.azureedge.net/sites/default/files/resource-files/WI-SNAP-COV-PEBT-Approval%20Letter.pdf>

Wisconsin to directly issue P-EBT benefits to approximately 75% of all eligible children in the state. Advocates found that direct issuance generally went smoothly.

Applications

Wisconsin complemented the direct issuance process for P-EBT with an application designed to capture the 25% of eligible children who were not directly issued benefits. Because of the relatively limited number of families that needed to apply, Wisconsin created a private application link meant to be shared only with eligible families by their home school district. Due to communications challenges at various levels, not all eligible families received the application link as intended. DHS, with the encouragement of advocates, ultimately chose to make the application link public.

Wisconsin's P-EBT application was built by a contractor (Deloitte) and was available only online, in both English and Spanish. The application was described by parents and advocates as user-friendly for those able to access it. The application was designed to capture student information that could be matched in real-time against a master P-EBT eligibility list (i.e. the list of children approved for F/RP meals that were not directly certified through another public program). According to DHS, approximately two-thirds of submitted applications instantly matched and displayed a "verified" message on the screen. For the other one-third of applications, the family received a "not verified" message. DHS reviewed each of these cases to determine whether the child was truly not eligible or could be verified through other means. A final determination was later sent to the family.

Timeline

Group 1: For eligible children enrolled in SNAP, Wisconsin issued P-EBT benefits to the SNAP card they already had. Recently closed SNAP cases with active EBT cards also received benefits on their existing card. Group 1, which included approximately 45% of eligible children, received P-EBT benefits in April.⁴

Group 2: Children eligible through direct certification from another benefit, including Medicaid, TANF, Foster Care, Homeless/Migrant Services, were issued new EBT cards. Group 2 received P-EBT benefits in May.

Group 3: All other eligible children could enroll in P-EBT via the application. The application link went live in early May. The link was initially publicized via schools and

⁴ Data provided by DHS showed P-EBT benefits issued on SNAP cards to 196,141 out of an estimated 438,375 total eligible children, or 44.7%.

then communicated more broadly over time to promote awareness of the program. The application deadline was then extended to July 31 out of a concern that too few families had applied by the original June 30 deadline.

Group 4: DHS expected to need a final clean-up phase for families who applied but could not be matched with eligibility lists from schools. As of early August, DHS was working through a backlog of approximately 11,000 to 12,000, unmatched applications to determine the appropriate outcome.

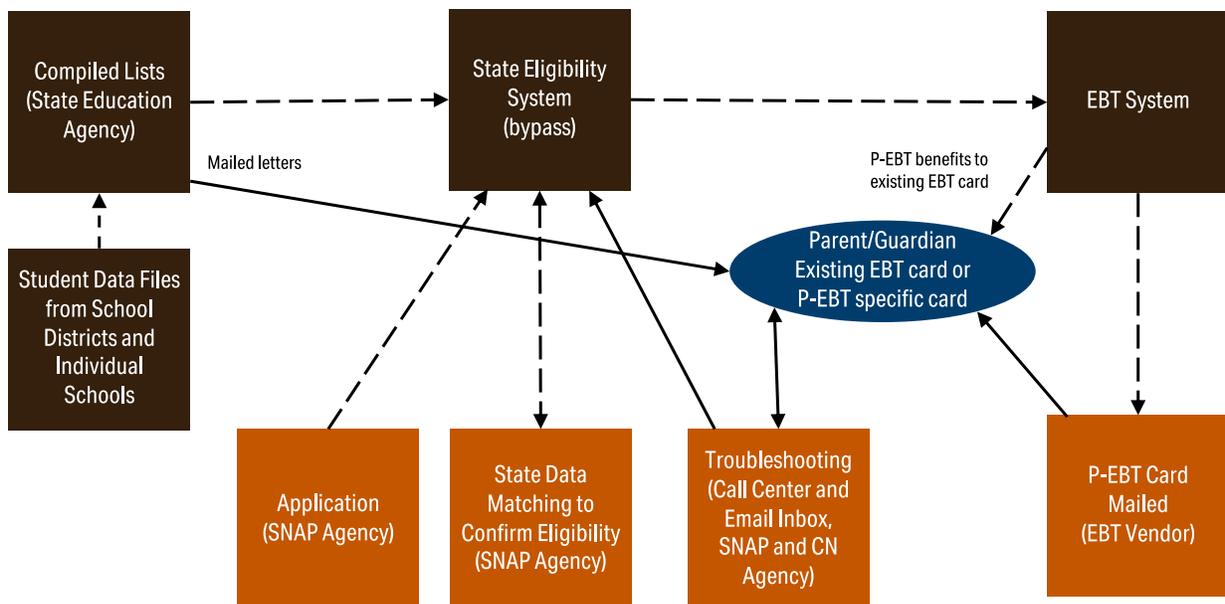


Figure 1: Illustration of the way information flowed between systems and agencies to enable P-EBT implementation in Wisconsin. The brown boxes represent information from an organization or a data system. The orange boxes represent the primary processes involved, and the blue ellipses represent the customer and the output. The lines represent the flow of information and whether it was electronic or manual- the dotted lines represent only electronic data. The map does not attempt to estimate workload or level of complexity to implement each of these steps.

Student Data

Wisconsin faced significant challenges with the accuracy and completeness of the student data needed to effectively administer P-EBT. The three datasets linked for P-EBT implementation all had limitations, including missing parent/guardian information and outdated addresses. The database from the DPI, called WISE, lacked information on the state’s private schools and could not confirm whether student information had been recently updated. State officials processing P-EBT applications found that they frequently had to contact local schools to confirm an individual student’s eligibility.

Data Matching

Another factor contributing to the significant percentage of unmatchable applications was the limited number of fields Wisconsin officials had available for matching. Because schools (and therefore DPI) do not collect Social Security numbers, and only one of the databases in use had mailing addresses, DHS's only option was to match students based on first name, last name, and date of birth. This reduced the overall success rate of matches, and limited DHS's ability to issue P-EBT benefits at the household level.

Systems and Contracts

Implementation of P-EBT in Wisconsin required a significant financial commitment from the state, including eligibility systems updates and staffing resources. With implementation still underway in late July, DHS officials estimated P-EBT had already required at least \$1 million in general revenue funds. While this investment is minimal compared to the benefit to families (over \$113 million in benefits invested back into the economy as a result of P-EBT issuances), these unanticipated costs have been a strain on the state's budget, especially without additional federal funding to support implementation.

Outreach

While Wisconsin's implementation design intended for schools to be the primary communicators with eligible families about P-EBT, some school administrators were unaware of P-EBT or were not able to make it a priority in the midst of all the other challenges schools were facing. Fortunately, community partners stepped up to help fill the communication gap and launched a statewide P-EBT outreach campaign to build community awareness and drive families to the application link once it became public. For example, the Milwaukee Hunger Taskforce led weekly webinars in both English and Spanish, sponsored targeted Facebook ads based on DHS data on P-EBT application rates, and shared outreach materials with their extensive, statewide network of food pantries and social service agencies.



"I wish I would have known about it and applied sooner. I've been trying to pick up meals at the kids' school, but that stopped. We are stretching our Social Security to keep the kids fed."

– Grandmother raising two grandchildren in Wisconsin

Troubleshooting

As in some other states, Wisconsin's SNAP (DHS) and Child Nutrition (DPI) agencies were overwhelmed with the volume of inquiries they received from parents about P-EBT. To track inquiries over time DHS and DPI both created dedicated email boxes. One possible reason state agency staff were overwhelmed is the relatively few staff dedicated to responding to parent inquiries. In a nationwide survey conducted for this project, Wisconsin reported dedicating 10-25 full-time equivalent (FTE) staff across agencies which is less than some other similarly-sized states (e.g. Minnesota) with P-EBT applications.

The most common topics of inquiry from Wisconsin families included:

- Needing an update on application status (likely driven by the work backlog at DHS)
- Difficulty activating P-EBT cards
- Benefits received for some, but not all children
- Questions about eligibility
- Confusion about whether they already received P-EBT benefits or needed to apply (e.g. for SNAP households who confused P-EBT and SNAP emergency allotments)
- Benefits issued to the wrong address or parent/guardian

Because neither DHS nor DPI had complete information, each family inquiry required significant research. State staff would first check DHS's benefits issuance list, then eligibility lists from schools. If a child did not match, staff had to conduct research to discern the reason. Possibilities included the child's information being wrong or outdated in the student information system (WISE), the child attending a private school not captured in WISE, or the child's enrollment in a community eligibility school where the student's school enrollment had to be confirmed.

Denials and Appeals

As mentioned, every "not verified" application was manually reviewed by DHS staff to determine whether the child could be identified through other means. True denials were issued to children who, based on information available to the agencies, were not eligible for F/RP school meals. After this pre-denial case review, Wisconsin provided a formal appeal process for those whose P-EBT applications were denied.

Due to the manual nature of this entire review process and the small size of the existing staff teams available to support it, a backlog emerged over time. According to one state official, DHS was only able to process 150 case inquiries per week in July, despite

thousands in the queue. The agency was able to speed up the review process in August and September in order to close out all cases by September 30.



"If we knew everything we know now, we would have done things differently. For now, we're just trying to manage a huge workload and make sure every eligible child gets served."

– SNAP agency official

Lessons Learned

1. Wisconsin ultimately faced many of the challenges experienced by both direct issuance states (e.g. outdated addresses for non-SNAP households, combining children at the household level) and application states (e.g. matching application data to master eligibility list), with no additional staffing support to manage this influx of work.
2. DHS and DPI agreed that better communication between agencies and with external partners before the program was announced publicly would have reduced confusion for families and schools.
3. Because of the data challenges identified through P-EBT implementation, DPI is considering new investments in their student data system (WISE), including adding address information, to be better prepared for the future.
4. Interestingly, DHS and DPI were in the planning phases to begin Summer EBT in 2020, which would have launched for just one district in 2020 and expanded to 20 districts in 2021. Instead DHS and DPI were faced with implementing the same process for every district in the state all at once without any time to prepare. State officials reiterated that a program of P-EBT's scale and complexity needs significantly more planning time and resources to be successful.



"I am so proud of my staff. This is way outside of their normal responsibilities and my team has worked really hard to help get families through this pandemic."

– Child Nutrition agency official



Appendix

More information on Wisconsin's P-EBT program is available at

<https://www.cbpp.org/sites/default/files/atoms/files/9-14-20fa-stateprofile-wi.pdf>.

Additional materials including FNS letter of approval, DHS P-EBT information sheet, P-EBT flyer, sample letter to SNAP and non-SNAP households can be found in the resource library available at <https://www.cbpp.org/pandemic-ebt-resource-library>.

