



Food and Nutrition
Service

1320 Braddock Place
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February 4, 2021

**SUBJECT: Pandemic Electronic Benefits Transfer Program (P-EBT)
Approval of Michigan's State Plan for School Children**

**TO: Vista Fletcher
Acting Regional Administrator
Midwest Regional Office**

The Families First Coronavirus Response Act (P.L. 116-127; the Act) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260) authorized the continuation of a temporary assistance program for households with children affected by school closures during the public health emergency that was declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Michigan's enclosed plan to operate P-EBT for school children.

Summary of State's Plan

The Michigan Department of Health and Human Services and the Michigan Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with eligible children. The State's plan covers the months of September 2020 through June 2021.

Children are eligible if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service at school.

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on SY 2019-2020 eligibility data will have a means to address that they do not issue benefits to last year's graduates and non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, Michigan has or will:

- rely entirely on new free or reduced price school meal eligibility determinations in SY 2020-2021; school districts are collecting new applications and conducting direct certification and are not relying on SY 2019-2020 eligibility,
- issue benefits for the months of September through January as early as March,

- issue benefits for the rest of the school year in April and June,
- collect each school building’s most frequently occurring student learning method (in-person, fully virtual, or hybrid) from school districts for each month:
 - issue the same benefit for each eligible child in a school building based on the building’s most frequently occurring learning method,
 - the State will collect this information in February (for the months of September through January), in April (for the months of February and March), and in June (for the months of April through June),
 - the State will collect learning method at the school building level because it is prohibited from collecting student-level learning methods from its school districts:
- use hybrid schedule data collected in a monthly survey from school districts by the Michigan Department of Education to set an average hybrid benefit:
 - determined that a 3-day per week average hybrid benefit is a reasonable reflection of hybrid schedules across the state for September through January,
 - use hybrid schedule data collected through the monthly DOE survey to set or adjust average hybrid benefits prior to issuing February-March and April-June benefits,
- establish a “reconsideration” process for households of children whose individual schedules justify a higher benefit than their school building’s default method:
 - households will submit a standard reconsideration form with documentation from their school supporting their claim; the State will review the documentation and confirm free or reduced price eligibility before issuing an adjusted benefit.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

Estimated Caseload and Value of P-EBT Benefits

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for free breakfast and lunch multiplied by the number of benefit days calculated as described in the State’s plan.

Michigan estimates that it will issue \$741.6 million to approximately 810,000 children for school closures and reductions in attendance and hours extending from September 2020 through June 2021.

Release of Information

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Michigan. Section 1101(e) of the Act states, “Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42

U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section.”

Plan Timetable and Revisions

Michigan will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible. The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

Civil Rights

Michigan will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

Administrative Funds

The Michigan Department of Health and Human Services will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State’s Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State’s operational plan evolves.

Reporting

The Michigan Department of Health and Human Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Michigan’s commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Midwest Regional Office.

Sincerely,

Cindy Long
Deputy Administrator
Child Nutrition Programs