## iPOM Requirements – Due no later than August 15, 2024

(may be submitted after August 15 with approved waiver – See 1.4)
Wisconsin's iPOM was submitted August 14, 2024 and Approved by FNS on 10/2/2024

- 1.1 Provide an estimate of the number of children who will be served in 2025 [7 CFR 292.8(e)(2)]: 490,000
- 1.2 Attach FNS-366A expenditure plans(s) that reflect planned Fiscal Year 2025 administrative cost requirements for each Summer EBT agency within the State that will draw Summer EBT administrative funds from FNS [7 CFR 292.8(e)(3)]. See instructions included with the FNS-366A and Attachment A of policy memo SEBT 01-2024, FM 01-2024 Summer EBT Administrative Funding Process for FY2024, October 18, 2023 for further information about the FNS-366A.
- 1.3 Attach a budget narrative that corresponds with the FNS-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 [7 CFR 292.8(e)(3)]. See Summer EBT budget narrative template and budget checklist.
- 1.4 Waiver request: To request a waiver of the August 15, 2024, deadline to submit the iPOM, the Summer EBT agency must provide the following:
  - 1.4.1 Describe why the waiver is needed and what steps the Summer EBT agency will take to complete the iPOM as quickly as possible:
  - 1.4.2 Describe the expected waiver implementation date and time period:

August 15, 2024, through (the date you expect to submit the iPOM)

- 1.4.3 Link to or provide a copy of the public notice informing the public about the proposed waiver(s):
- 1.4.4 Affirmations
  - ☐ The waiver will not increase the overall cost of the Summer EBT Program to the Federal Government. If there are anticipated increases, confirm that the costs will be paid from non-Federal funds.
  - ☐ The Summer EBT agency will monitor and review implementation of the waiver and report on implementation including a description of how the waiver was implemented and its impact on program administration.

## POM Requirements – Due not later than February 15, 2025

(may also be included with the iPOM submission)

## 2. iPOM updates

3. Summer EBT agencies

Wisconsin needs to update its iPOM estimate for the number of children who will be served in 2025 from 490,000 to 505,000. Wisconsin is also revising its iPOM financial plans, per the attached FNS-366A and Budget Narrative.

	3.1 Coordinating agency: Wisconsin Department of Health Services (DHS)
	☑ Is requesting administrative funds through a 366A.
	☐ Request for administrative funds through a 366A includes local level costs, if applicable.
	☐ Is <u>NOT</u> requesting administrative funds through a 366A.
	3.2 Partnering agency: Wisconsin Department of Public Instruction (DPI)
	Is requesting administrative funds through a 366A.
	Request for administrative funds through a 366A includes local level costs, if applicable.  Is <u>NOT</u> requesting administrative funds through a 366A.
	The memorandum of understanding (MOU) between DHS and DPI will be updated with the
	requested revisions related to 7 CFR 292.3(c)(1) and 7 CFR 292.20(h), sent by FNS on 2/5/2025.
	The requested updates will be included in the existing MOU as an addendum and rerouted for
	approvals by both agencies' leadership. The updated and fully executed MOU will be sent to FNS
	the February 28, 2025.
4.	2025 summer schedule and issuance dates
	4.1 Provide the start and end dates of the summer operational period and an explanation for why
	these dates were selected [7 CFR 292.2 "Summer operational period"; 7 CFR 292.8(e)(10)(i)]:
	First day of the summer operational period: 6/14/2025
	Last day of the summer operational period: $8/28/2025$
	Explanation: In Wisconsin, there is no standardized calendar that each School Food Authority (SFA) must
	follow when setting start and end dates for their instructional year. Therefore, there is no one date that

the start of the 2025 Summer Operational Period and, in other words, the first time that many students in the state will no longer have access to meals through the National School Lunch Program for the preceding school year.

all SFAs either start or end the 2024-2025 instructional year. That said, according to data from the Wisconsin Department of Public Instruction, the second week of June (the week of June 9, 2025 through June 13, 2025) will be the final week of the 2024-2025 school year that five of the state's largest SFAs<sup>1</sup> will be offering meals to eligible students through the National School Lunch Program, per their National School Lunch program contracts. As such, Wisconsin is proposing the use of Saturday, June 14, 2025 as

<sup>&</sup>lt;sup>1</sup> These districts include Milwaukee Public Schools, Madison Metropolitan School District, Kenosha Common School District, Racine Unified School District, and Waukesha School District.

Regarding the end of the 2025 Summer EBT Summer Operational Period, Wisconsin has chosen a date of August 28, 2025. Based on this same publicly available data, the most common date for instructional years to begin in Wisconsin for public School Food Authorities is September 1 of each year<sup>2</sup>. Assuming that this trend has continued into the 2024-2025 instructional year, ending the 2025 Summer EBT Summer Operational Period on August 28 will ensure that the vast majority of children statewide will continue to have an opportunity to establish their 2025 Summer EBT eligibility for the duration of their summer break and until the beginning of their next instructional year. This proposed end date will also allow Wisconsin to conduct a complete systematic issuance of benefits to newly eligible children on Saturday, September 20, 2025. By closing the window for applications and for newly establishing eligibility on Thursday, August 28, Wisconsin can pull administratively available data on Friday, August 29 in order to inform its Saturday, September 20 issuance. (For context, this data can only be provided by state agency partners on a weekday, and systematic issuances can only take place on a Saturday). Pulling the data the day after the close of the Summer Operational Period will ensure that the State is utilizing a complete list of eligible children as part of its final systematic issuance in September. See Section 4.5 for additional details on issuance schedule.

	4.2	The Summer	EBT a	gency v	will issue	benefits	in
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- ☑ A single issuance (i.e., lump sum).
- ☐ Multiple issuances (e.g., monthly issuances):

### 4.3 [NUMBER] issuances of \$[AMOUNT] each provided on [DATES].

Wisconsin will be providing Summer EBT benefits to each eligible child in one, lump sum payment, according to the dates listed in Sections 4.4 and 4.5. The amount of benefits provided per eligible child for 2025 will be determined by the United States Department of Agriculture and will be effective as of January 2025, per 7 CFR 292.15(e).

#### 4.4 Date(s) when benefits will be issued:

Type of enrollment	Date or dates of issuance	Estimated Number of Children Issued by each enrollment type
Streamlined Certification and Summer EBT applications received prior to May 16, 2025	June 7, 2025	(This includes 420,000 children estimated to be able to receive benefits on May 17, 2025 as well as 55,000 children identified as eligible but for whom benefits cannot immediately be issued. These 55,000 children are placed in the Wisconsin Summer EBT Queue and will have their benefits issued on an ongoing basis once missing information is made available to the state, such as the mailing address or parent's/caretaker's date of birth).

<sup>&</sup>lt;sup>2</sup> This is the case for the 2020-2021 school year, the 2021-2022 school year, and the 2022-2023 school year (the most recently available year of data).

Streamlined Certification and Summer EBT applications received prior to June 20, 2025	July 12, 2025	4,000
Streamlined Certification and Summer EBT applications received prior to July 25, 2025	August 16, 2025	9,000
Streamlined Certification and Summer EBT applications received prior to August 29, 2025	September 20, 2025	10,000
Summer EBT applications received outside the window of data collection in advance of each	Within 15 operational days of receipt of a complete application*	7,000
systematic issuance	* For applications received once the 15 day processing/ issuance requirement is in effect that are pulled as part of the required 3% verification sample, they will	
	processed as quickly as possible, but the 15 day requirement may be exceeded if the receipt of verification documentation	
Total number of estimate	from households is delayed.	505,000

# 4.5 Additional information on schedule for benefit issuance or the estimated number of children, if any:

As was done in the 2024 Summer EBT implementation, Wisconsin will re-pull administratively available data on children who are eligible via streamline certification approximately once per month throughout the 2025 Summer Operational Period. This involves accessing data from the Wisconsin Department of Health Services, the Wisconsin Department of Public Instruction, and the Wisconsin Department of Children and Families. For any children who appear in these datasets and, after de-duplication efforts, are determined to be newly eligible (meaning they have not previously been issued Summer EBT benefits for 2025), Wisconsin will conduct a systematic issuance. The dates for these ongoing systematic issuances

will likely be<sup>3</sup>:

July 12, 2025 August 16, 2025 September 20, 2025

4.6 Does the State have Local Education Agencies (LEAs) operating on a continuous school calendar [7 CFR 292.2 "Continuous school calendar"]?

☑Yes (complete the rest of this question)

■ No (skip to section 5)

If yes, describe the school calendar(s) and break schedule(s) for LEAs operating on a continuous school calendar and any adjustments to your issuance schedule for children attending these schools, if applicable [7 CFR 292.15(b), 7 CFR 292.15(e)(4)]:

In Wisconsin, there are three National School Lunch Program-participating schools that operate on a continuous school calendar. All three have their longest break of the year during the summer operating period, as detailed below.

One City Schools – Break from June 9 to June 13, 2025, School closed July 21 to August 31, 2025 LaCrosse School District, Northside Elementary School – School closed June 6 to July 17, 2025 Tomah School District, Lemonweir Elementary School – School closed June 5 to July 15, 2025

No adjustments will be made to Wisconsin's Summer EBT issuance schedule for children attending these schools. If eligible, they will receive benefits as part of the issuance schedule outlined in Section 4.4.

#### 5. EBT Issuance

- 5.1 Select all that apply [7 CFR 292.15(c)(2)]:
- ☐ The Summer EBT agency will co-load benefits on existing accounts/cards. Type of account(s) that will co-load (e.g., SNAP, NAP, TANF): SNAP
- For children whose benefits are not co-loaded on an existing account, the Summer EBT agency will issue one card to each household.
- For children whose benefits are not co-loaded on an existing account, the Summer EBT agency will issue one card to each eligible child.

#### 6. Eligibility

- 6.1 Complete the following table Attachment A Data collection and use.
- 6.2 For State Summer EBT agencies serving the same geographic area as an ITO Summer EBT agency, how, when, and in what format will you share program data with the ITO(s)? [7 CFR]

<sup>&</sup>lt;sup>3</sup> These dates are subject to change and have not yet been finalized.

## 292.8(e)(8), 7 CFR 292.9]

6.3 For the purposes of streamline certifying children without matching to NSLP enrollment lists, provide the State's legal ages of compulsory school enrollment [7 CFR 292.2 "School aged"; 7 CFR 292.12(d)]. \* Please note that children are eligible if they are school age between July 1, 2024, and the last day of your SOP in 2025.

Minimum age: <u>6 – Date of birth on or before 8/31/2019</u>

Maximum age: <u>18 – Date of birth on or after 7/1/2006</u>

## 6.4 [NEW] Statewide database:

Question	Response			
Summer EBT agency responsible	Wisconsin Department of Public Instruction			
for maintaining the database:				
Does the Statewide database	☑ Name			
contain, at a minimum, the	☑ Date of birth			
following fields? [7 CFR	☑ School/school district where enrolled			
<u>292.12(c)(1)]</u>	☑ Mailing address			
	☑ Individual free or reduced-price eligibility			
	status, as applicable			
	Any other information needed to issue			
	benefits timely and with integrity, explain:			
	Other key data elements will include:			
	- A 10 digit identification number for each student			
	- Student gender			
	<ul> <li>Student grade level</li> <li>The date when a student was added to or modified within the database</li> </ul>			
	<ul> <li>An indicator to show the source of each student's eligibility (such as DPI data, DCF direct certification</li> </ul>			
	data, DHS data, etc)			
	- An indicator to show the reason that each student is			
	eligible for benefits (such as FRPL approved, S-EBT			
	application approved, etc)			
	- Parent/caretaker name, date of birth, and address			
How will the Summer EBT agency	The Wisconsin Department of Public Instruction (DPI) will			
use the statewide database to	use this database to perform NSLP enrollment checks			
create the issuance file?	when reviewing and approving Summer EBT applications received. Any children submitted via Summer EBT			
	application for whom NSLP enrollment can be confirmed			
	through this database (and for whom all other criteria and			
	verification requirements are met) will be included in the			
	overall dataset(s) of Summer EBT-eligible children sent			
	from DPI to the Department of Health Services (DHS) in			

	accordance with the schedule laid out in Section 4.4. DHS will compile these DPI datasets with those pulled from DHS' own records and those received from the Department of Children and Families and, following rigorous deduplication and matching efforts, will issue benefits to all children known to be eligible.  This DPI-managed database will facilitate expeditious Summer EBT application approval and aid in the early detection and prevention of duplicate benefit issuances.
Can the Summer EBT agency	☑ Yes
utilize the statewide database to check child enrollment?	□ No
Summer EBT agency conducting the enrollment check:	Wisconsin Department of Public Instruction
How will the database be used to	DPI staff will search within and match Summer EBT
confirm that an applicant for	applicants against this database to confirm their
Summer EBT is enrolled at an	enrollment in an NSLP/SBP-participating Wisconsin school
NSLP/SBP school [7 CFR	for some or all the immediately preceding instructional
292.8(e)(7), 7 CFR 292.12(e)(2)]?	year. A Summer EBT applicant's presence within this
	database will be a prerequisite for their application for
	benefits to be approved and for the child to be included in
	issuance files sent from DPI to DHS in advance of each systematic issuance.

# 7 Applications

7.4 In 202 □	5, Summer EBT applications will be <u>processed</u> by [ <u>7 CFR 292.13, 7 CFR 292.13(b)</u> ]: The Summer EBT agency.  LEAs through a contract with the Summer EBT agency (if applicable, new costs associated with application processing and verification must be included in your budget).
$\square$	Other: Wisconsin Department of Public Instruction (Summer EBT Partnering Agency)
7.5 In 202	5, Summer EBT applications will be <u>verified</u> by [ <u>7 CFR 292.14</u> ]:
	The Summer EBT agency.
	LEAs through a contract with the Summer EBT agency (if applicable, new costs associated with application processing and verification must be included in your budget).
	Other: Wisconsin Department of Public Instruction (Summer EBT Partnering Agency)
7.6 Is the	Summer EBT agency proposing an alternative method for verification [7 CFR 292.14, 7 CFR
<u>292.1</u>	4(a)(3)] in lieu of the standard 3% random sample [7 CFR 292.14(a)(2)]?
	No
	Yes; proposed alternative verification procedures described below:

Wisconsin plans to conduct rolling verification of Summer EBT applications that are submitted before the end of the 2025 Summer Operational Period. Verification will be led by the Wisconsin Department of Public Instruction with support from the Department of Health Services and the Department of Children and Families as needed. When direct verification is not possible, the Department of Public Instruction will notify a household of its selection for verification and will then contact the household ten days after the initial verification notification as well as again seven days after the last contact assuming documentation has not been received.

All required verification for applications received before April 1, 2025 will be completed by April 21, 2025. Approved and verified applications in this group will receive their benefits as part of the first systematic issuance happening on June 7, 2025. For applications received once the 15 day processing/issuance requirement is in effect that are pulled as part of the required 3% verification sample, they will processed as quickly as possible, but the 15 day requirement may be exceeded if the receipt of verification documentation from households is delayed.

All Summer EBT applications that are received between the date when the 2025 Summer EBT application is first made available (November 18, 2024) through March 2025 will be processed by April 4, 2025.

Rolling verification will be conducted based on the following schedule:

	November	December	January	February	March
Application Collection Period	11/18/2024 - 11/30/2024	12/1/2024 - 12/31/2024	1/1/2025 - 1/31/2025	2/1/2025 - 2/28/2025	3/1/2025 - 3/31/2025
Date Verification Begins for Approved Applications Received in this Period	12/2/2024	1/6/2025	2/3/2025	3/3/2025	4/1/2025
Percentage of Approved Applications Selected for Verification	3%	3%	3%	3%	3%

**Verification Period Guidelines**: If/when a household needs to provide verification documents, attempted contact will be made at least two times to retrieve requested documentation. If all requested documents are not submitted by this time, their application will be placed on hold until such time as all requested documents have been submitted.

	April	May	June	July	August
Application Collection Period	4/1/2025 - 4/30/2025	5/1/2025 - 5/31/2025	6/1/2025 – 6/30/2025	7/1/2025 - 7/31/2025	8/1/2025 - 8/28/2025
Date Verification Begins for Approved Applications Received in this Period	5/1/2025	6/2/2025	7/1/2025	8/1/2025	8/29/2025
Percentage of Approved Applications Selected for Verification	3%	3%	3%	3%	3%

**Verification Period Guidelines**: If/when a household is contacted about needing to provide verification documents, attempted contact will be made at least two times to retrieve requested documentation. If all requested documents are not submitted by this time, their application will be placed on hold until such time as all requested documents have been submitted.

## **8** Customer Service Plan

8.4 Describe how you will provide customer service, including the following [7 CFR 292.8(e)(11); 7 CFR 292.15(g)]:

Requirement	Response
Single point of contact for all	Hotline: 833-431-2224
customer service information and	Email: dhssebtsupport@wi.gov
inquiries including a hotline and	Other (including the EBT processor's Interactive
website.	Voice Recognition [IVR] system): 877-415-5164
	Note: Within the DHS-run hotline's IVR, there will be prompts that funnel callers from schools and/or callers with questions related to the Summer EBT application directly to representatives at DPI. If DPI bandwidth issues arise due to high call volume, DHS Summer EBT Support Team staff would be able to redirect those school and application-based calls back to the DHS team to support DPI staff.
A plan to inform eligible	The Wisconsin Department of Health Services (DHS) and the
households of the availability of	Wisconsin Department of Public Instruction (DPI) will be working
Program benefits and the process	together to update existing Summer EBT communications
to apply for benefits, if necessary.	materials used in 2024 as well as develop new, targeted materials for use in 2025 and beyond. These materials include

	but are not limited to: program flier/fact sheet, template language for schools to send in their newsletters, DPI bulletins sent to School Food Authority administrators, updates to the DHS and DPI webpages and social media accounts, and template language/fliers for outreach organizations to use/adapt for their webpages and for print.
	Specific to the process for applying for benefits, the following steps are being taken to ensure families are aware of who needs to use the application, where to find it, and how to get help if needed:  - Application link available on both the DHS and DPI S-EBT webpages (at the top, via callout boxes, in FAQ sections)  - Dropdown section on current DHS webpage with more information about who should apply (with a link to the application) as well as a new, more detailed FAQ page that will answer specific questions about the application (with a link to the application itself)
	<ul> <li>A Summer EBT Fact Sheet – linked on the DHS S-EBT webpage – links to the S-EBT application</li> <li>Messaging templates sent to School Food Authorities to use in promoting S-EBT include a link to the application, are available in multiple languages, and are tailored based on different types of schools (regular NSLP, Special Provision, non-NSLP)</li> </ul>
A simplified process for households to opt out of the program.	The Wisconsin Department of Health Services created and oversees the Benefit Management Tool. This simplified online tool allows families to share their decision with the State to opt out from receiving Summer EBT on behalf of their child(ren). There are no log-in credentials needed to access this tool – it is available on the Wisconsin Department of Health Services' Summer EBT webpage as well as shared within other program platforms and communications materials.
The process to encourage and facilitate households to provide updated contact information for the purpose of receiving Summer EBT.	The Wisconsin Department of Health Services' Benefit Management Tool also allows families to share their updated contact information with the State for the purposes of receiving Summer EBT on behalf of their child(ren). There are no log-in credentials needed to access this tool – it is available on the Wisconsin Department of Health Services' Summer EBT webpage as well as shared within other program platforms and communications materials.
The process for households to confirm eligibility status.	As was the process in 2024, households can contact the Summer EBT Support Team via phone or email at any time following the first systematic issuance of Summer EBT benefits in 2025 to confirm program eligibility for their child(ren).
The procedures the Summer EBT agency will implement to provide access to households experiencing	The DHS-led Summer EBT Support Team will offer/utilize the same translation services used by the DHS SNAP team, which will help address challenges encountered by families with limited

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)].

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 dataset of eligible children. 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 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.

#### 9 Program violations and errors

9.4 Provide a plan for timely and effective action against program violators [7 CFR 292.8(e)(4), 7 CFR 292.25]. If your Summer EBT mirrors or builds upon your SNAP, WIC or NAP process, you must still provide a description of the plan.

Per 7 CFR 292.25, DHS will promptly investigate complaints received or irregularities noted in connection with the operation of the Summer EBT program and will take appropriate action to correct any irregularities. 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. Specifically, per 7 CFR 273.16(i)(1), Wisconsin will report to FNS information concerning individuals disqualified for an intentional Summer EBT program violation, including those individuals disqualified based on the determination of an administrative disqualification hearing official or a court of appropriate jurisdiction, and those individuals disqualified as a result of waiving their right to a disqualification hearing or a disqualification consent agreement in cases referred for prosecution. This information shall be submitted to FNS so that it is received no more than 30 days after the date the disqualification took effect.

In alignment with SNAP regulations 7 CFR 273.16(c), an intentional program violation for Summer EBT will be defined as the following acts being committed by someone 18 years or older or by someone 18 years or older ordering, coercing, persuading, encouraging, or otherwise inducing someone younger than 18 years old into: (1) Making a false or misleading statement, or misrepresenting, concealing or withholding facts; or (2) Committing any act that constitutes a violation of Summer EBT

regulations or any State statute for the purpose of using, presenting, transferring, acquiring, receiving, possessing or trafficking of Summer EBT benefits or EBT cards.

As with Wisconsin's SNAP program violation policy, for Summer EBT, DHS will look back 12 months from the date of discovery (the date the error/violation claim is first created) to further investigate the scope of agency errors and 72 months from the date of discovery for non-agency errors (or suspected intentional program violators).

Once a suspected intentional violation is identified and researched by DHS, communication will be sent to the individual with information about the claim, information about administrative disqualification hearings, and instructions and deadlines for scheduling such a hearing.

Following a decision from the administrative disqualification hearing confirming a violation (or following the individual's decision to waive their right to such a hearing), recoupment of the individual's Summer EBT benefits will be pursued. DHS will be present at the administrative disqualification hearing to represent the State. Recoupment of Summer EBT benefits will only be pursued in the event of a confirmed, intentional violation but not in the event of an agency error. In the event of a confirmed, intentional violation, comments will be incorporated into the individual's case record, and these such individuals will be tracked in a secure dataset for reference in advance of future issuances of Summer EBT.

As is the case with Wisconsin's SNAP program violation policy and federal SNAP regulations 7 CFR 273.16(b)(1), a first-time perpetrator of a confirmed Summer EBT program violation will be disqualified from receiving Summer EBT for one program year — meaning they cannot be eligible to receive Summer EBT benefits for the summer immediately following the offense. Additional violations beyond the first time or violations that span more than one state will be subject to more prolonged disqualification from receiving Summer EBT benefits. Specifically, a second-time confirmed violation will result in a disqualification from receiving Summer EBT benefits for the subsequent two summers, and a third-time violation will result in a permanent disqualification.

For cases where a recipient of Summer EBT benefits also receives benefits from another benefit program managed with our State's integrated eligibility system (such as SNAP), any investigation related to Summer EBT-specific potential program violations may result in broader investigation into the individual's whole case record within the system (including, for instance, their SNAP eligibility, actions, or violation history/status). Should a potential Summer EBT program violation raise concerns about the individual's interaction with other benefit programs managed within our integrated eligibility system, the State reserves the right to investigate further into their program activity beyond just Summer EBT.

9.5 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).

In instances in which benefits are incorrectly assigned but the error is not identified before the benefits are issued and made accessible to the recipient, the State will work to recoup any benefits that were incorrectly issued but have not already been spent whenever possible if the incorrectly issued amount exceeds \$500 – the threshold approved in Wisconsin's Cost Effectiveness Plan. When the incorrectly issued amount is less than \$500, the State will not seek recoupment. In this Cost Effectiveness Plan, it is noted that Wisconsin reviewed claim thresholds in nearly all states across the country and found \$500 to be a fair and comparable recoupment threshold to use in our programs. Additionally, as outlined in this Cost Effectiveness Plan, the State has performed relevant analysis and determined that pursuing claims amounting to less than \$500 was not cost-effective.

When an incorrect amount of benefits were issued and then recouped as well as when benefits were incorrectly issued to the wrong parent/caregiver and then recouped, the State will work to correct the error and re-issue to the correct parent/guardian/current caregiver and/or in the correct, full amount. Additionally, the State will seek recoupment of Summer EBT benefits in any amount if a case of intentional fraud is identified (such as falsified documents being provided to the Summer EBT Support Team). Of note, DHS will never reclaim Summer EBT benefits by reducing a household's SNAP or WIC benefit per 7 CFR 292.27(c)(3).

## 10 [Optional] - Give yourself some Kudos!

Tell us about something you're doing that you're proud of (e.g., improved program implementation, excellent customer service, implementing new systems/technologies).

11. Summer EBT Agency Signatures - The POM must be signed by the Summer EBT agency or agencies-designated official responsible for ensuring that the Program is operated in accordance with the POM.

# TO BE COMPLETED BY THE SUMMER EBT AGENCY OR AGENCIES

COORDINATING AGENCY	PARTNERING AGENCY
By (Signature) Autility	By (Signature) Chamell Counford
Title Director, Bureau of Eligibility Operations and Training	Title Assistant State Superintendent Division for Finance and Management
Date 3/4/25	Date 3/11/25

#### TO BE COMPLETED BY THE FNS REGIONAL OFFICE

**FNS REGIONAL DIRECTOR** 

By (Signature)	
Title	
Date	