

Summer EBT



37

STATES HAVE
COMMITTED IN 2024.
IS YOUR STATE
ONE OF THEM?

WHAT IS THE
ADMINISTRATIVE BURDEN
TO STATES?

ADVOCATE FOR YOUR STATE.

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CONTRIBUTING ORGANIZATIONS

FOOD RESEARCH & ACTION CENTER ([FRAC](#))

SOUTHERN ECONOMIC ADVANCEMENT PROJECT ([SEAP](#))

Introduction

The Summer EBT program ensures that qualifying families whose children receive free and reduced school lunches during the school year will receive \$40 per child in federally-funded, pre-loaded SNAP / EBT cards for every month of summer break. Launching this year, Summer EBT will continue to be a permanent program going forward.

The U.S. Department of Agriculture (USDA) recently released an Interim Final Rule for the Summer EBT program, which details the way the program must be set up and what is required for implementation. As of April 2024, [37 States, Washington D.C., all 5 territories, and 2 Indian Tribal Organizations](#)* have committed to run the program in 2024.

Summer EBT is a state administered program. Some states are citing the administrative burden as a reason they are not moving forward with implementing the program. The Food Research & Action Center (FRAC) and the Southern Economic Advancement Project (SEAP) are working to ensure all states implement Summer EBT in Summer 2025. This resource highlights the flexibilities and aid that USDA is providing states to lessen the administrative burden.

The following are administrative components of the program that states are responsible for, and the ways USDA is proposing to help.



*** As of May 2024, the following states have NOT committed to run Summer EBT in 2024:**
Alabama, Alaska, Florida, Georgia, Idaho, Iowa, Mississippi, Oklahoma, South Carolina, South Dakota, Texas, Utah, Wyoming

Plan of Operation and Management (POM)

A state's POM must include plans on how the state or Indian Tribal Organization (ITO) will structure the program; an administrative budget; a copy of written agreements detailing the roles and responsibilities of each agency; plans for cooperation between state-administered and ITO-administered programs; participation estimates; enrollment processes and issuance processes; program integrity; and plans for customer service and support.



USDA Technical Assistance and Flexibilities:

- USDA has released a [template](#) for states to fill out for the POM. [Regional offices](#) are available to answer questions about the POM or any novel methods a state wants to use to operate the program.
- USDA has provided detailed feedback and responses, including model language, on all parts of the POM. This has helped expedite state and ITO revisions and continued implementation as we work together toward an approved POM.

Applications and Verification

USDA Technical Assistance:

- USDA streamlined the application requirements, minimizing the effort necessary for families to complete applications and states to process them.
- To minimize the administrative burden, Summer EBT applications will be verified in the same manner as school meals applications as opposed to upfront verification. This means that after the initial certification of applications, three percent of applications chosen at random must be verified. The three percent sample is based on the number of approved applications on file as of April 1 immediately preceding the summer operational period.
- In lieu of selecting a three-percent random verification sample, Summer EBT agencies may propose alternative methods for verification that still comply with basic verification requirements, including procedures and assistance to households, and the restriction that prohibits Summer EBT agencies from requiring up front documentation.
- USDA plans to release an online application that can be used by states and open-source code to allow states to adapt the application template.
- USDA also plans to release a paper prototype application for Summer EBT that States and ITOs can adapt for their needs.
- USDA will soon release template household notices that States and ITOs can adapt and use in 2024 and beyond.

States must have a statewide Summer EBT application available for 2025, or establish agreements with school districts to process the applications.

States must verify a 3 percent sample of Summer EBT applications, and all applications will also be subject to verification for cause.



Customer Service

States must have a single point of contact for customer service inquiries, including a telephone hotline and a website dedicated to Summer EBT.

States must notify a household of a child's eligibility status. Those who can be streamline-certified must be notified in writing that their child(ren) is/are eligible for Summer EBT without an application.

Families must be given:

- a way to see if they are eligible;
- a way to opt out of the program;
- an eligibility determination within 15 operational days;
- any denials in writing and the reason for denial, notification of the household's right to appeal, and a reminder they can reapply at any time;
- notification of when benefits will be available; and
- a notice no more than 30 days before benefits are expunged.

USDA Technical Assistance and Flexibilities:

- USDA has produced multiple resources for states to utilize to accomplish the requirements set forth in the IFR. They have created and posted an [outreach toolkit](#) which includes translation of materials for states to utilize and customize.



Database for NSLP/ SBP Enrollment

USDA Technical Assistance:

- The IFR allows states to repurpose an existing database with similar data for Summer EBT. For states that must create one, USDA is exploring funding sources that can help cover the initial investment and will provide technical assistance and support.
- No Kid Hungry and Code for America, in close consultation with USDA, developed resources to support state agencies with the technical aspects of implementing Summer EBT. These resources are designed to focus on the experience from the family perspective. [The Summer EBT Playbook](#) provides a deep dive into the technical requirements for Summer EBT implementation, providing suggestions and tips for addressing common challenges and outlining key considerations related to streamline certification, application administration, and benefit issuance.

Summer EBT agencies must have a state- or ITO- wide database of children who are enrolled in NSLP- or SBP- participating schools by 2025.

The database must include the following fields at a minimum: name, date of birth, school or school district, mailing address, free/reduced-price meal eligibility determination, and any other pertinent information for distributing benefits. This data must remain confidential and can only be used for the Summer EBT Program or to provide other social service benefits to eligible children.



Advocate for your State

Overall, USDA has committed to ensuring state flexibility to implement this new program. If a state has challenges meeting certain program requirements and communicates them to USDA, the federal agency is prepared to provide technical assistance. USDA will facilitate states implementing Summer EBT in Summer 2024 sharing promising practices from their first year. Some of the administrative burden is due to setting up a new program and will decrease once the new Summer EBT requirements are implemented for the first time.

FRAC and SEAP are focused on working with USDA and states to maximize state participation in the Summer EBT program moving forward. With the flexibilities and technical assistance provided by USDA, states have tools to minimize the administrative burden and implement the Summer EBT program, which can help children return to school in the fall well fed and ready to learn.

Resources: Know the Facts

Empower yourself and others to advocate for your state to participate in Summer EBT next year (Summer 2025) with the facts about Summer EBT.

Purchasing Power

Qualifying families in participating states will have a bit more purchasing power in their pockets this summer. Summer EBT benefits will help them ensure their children will have adequate nutrition over the summer months.





Recipe for Success

Summer EBT is a program that works in partnership with additional federal food assistance programs. It has a [proven track record](#) of successfully reducing child hunger and increasing consumption of healthy foods.

A Local Economy Boost

Local economies stand to benefit when states participate in the Summer EBT program. According to the [Food Research and Action Center](#) (FRAC), every dollar spent on SNAP generates between \$1.50 and \$1.80 in local economic activity during an economic downturn.

FRAC Resources

Share these [state-specific fact sheets](#) with key decision-makers in your state.

Read and share this [one-pager](#) that makes the case for summer meal programs and summer EBT to be offered by states as complementary programs.

This [interactive map](#) provides household food insecurity rates, by state, on average over 2019-2021.

SEAP Resources:

SEAP, in partnership with FRAC, created this [Snapshot of Summer EBT in the South](#).

Between 2021 and 2023, SEAP surveyed 5,000 Southern voices through two Community Needs Surveys. Check out the [results](#), and learn more about the economic burdens faced by families living with the reality of food insecurity.

Want to connect with like-minded advocates in your state? SEAP is ready to connect you with our vast network of progressive policy thinkers and doers in your state and across the south. [Email us](#) today!

USDA Resources:

The USDA's Food and Nutrition Service has developed a [Summer EBT Implementation Toolkit](#) and [Summer EBT Outreach Toolkit](#) to assist states, tribal organizations, and territories offering Summer EBT this year, as well as partner organizations critical to getting the word out about the program to families who can benefit. Their website also has an extensive list of Summer EBT Questions and Answers [here](#).

About the Food Research & Action Center (FRAC):

FRAC improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions. Learn more [here](#).

About the Southern Economic Advancement Project (SEAP):

SEAP partners with policy thinkers and doers to amplify their efforts and bridge gaps in policy infrastructure. Our goal is to advance policies that improve economic security, access to healthcare, and environmental justice for all Southerners. Visit our [website](#) to learn more.

The USDA reviewed the language for this resource.

