



Improving Summer EBT for Indian Tribal Organizations

In the first year of implementation of the Summer Electronic Benefit Transfer Program (Summer EBT), 2024, two Tribes — the Chickasaw Nation and the Cherokee Nation — successfully distributed benefits for eligible children in the state of Oklahoma. Three additional Tribes — Otoe-Missouria Tribe, Muscogee Creek Nation, and Choctaw Nation of Oklahoma — opted in for the second year. While this progress should be celebrated, many Tribes that are interested in participating in Summer EBT are unable to do so because of the unique challenges and barriers they face in implementation. Moving forward, there is an opportunity to implement best practices and advocate for changes to the Summer EBT Program that will allow more Tribes to distribute benefits and reduce summertime food insecurity.

Recommended program changes are detailed below:

Statutory Changes

- **Change the statutory language to allow Tribes running nutrition programs other than the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to participate in Summer EBT.** Currently, for a Tribe to run Summer EBT, they must run the WIC program. Only 33 Indian Tribal Organizations (ITOs) operate WIC. By opening Summer EBT eligibility to include Tribes successfully operating other Tribal nutrition assistance programs, Congress could allow for broader Tribal participation.
- **Reduce or eliminate the 50 percent administrative match.** To operate Summer EBT, administering agencies must cover 50 percent of all administrative costs associated with operating the program. The 50 percent administrative match is a limiting factor for many Tribes that would like to operate the program. Congress should consider allocating funding to support this match so that additional ITOs can participate.

Regulatory Changes

- **Align program and reporting requirements with programs outside of the Supplemental Nutrition Assistance Program (SNAP) and consider the capacity of non-state entities.** Summer EBT Program requirements were designed with state agencies in mind rather than Tribes.

In addition, reporting requirements are based on a SNAP model and not a WIC model. Burdensome requirements facing ITOs — such as submitting two plans of operation and management each year and reporting requirements — stretch already overloaded Tribal staff. Additionally, requirements to utilize data-reporting systems that are not aligned with Tribal systems hinder participation. By making slight adjustments in both statutory language and regulations, Tribes could more easily implement Summer EBT.

- **Provide specific technical assistance aimed at Tribal implementation.** While U.S. Department of Agriculture (USDA) has provided technical assistance for Summer EBT, particularly in the first year of implementation, these efforts are geared towards state entities. ITOs have worked together to provide technical assistance for one another, but targeted support from USDA would make the implementation process simpler for Tribes.

Proposed Legislation

In addition to statutory and regulatory support, legislation has been introduced on the federal level that would address concerns around the 50 percent administrative match, as well as to provide grant funds for implementation.

The **Stop Child Hunger Act of 2025** ([S. 1622](#)/[H.R. 3217](#)) would help implementation by Tribes by:

- expanding the Summer EBT Program by increasing the amount of benefits a family receives;
- providing benefits during the school year for school breakfast and unanticipated school closures;
- supporting state/ITO implementation by phasing in the 50 percent administrative fund match; and
- providing \$50 million in funds for implementation grants for states and ITOs.

The bill was introduced by Sen. Murray (D-WA) in the Senate and by Reps. Levin (D-CA) and Hayes (D-CT) in the House, on May 7, 2025. View Senate co-sponsors [here](#) and House co-sponsors [here](#).

For more information on Summer EBT implementation by ITOs, read [*Summer EBT in Indian Country: A Report on Tribal Success, Barriers, and Best Practices*](#).