



Pandemic EBT
Recommendations for a Permanent Nationwide Summer EBT Program

Introduction

The Pandemic Electronic Benefit Transfer (P-EBT) Program was created by Congress through the Families First Coronavirus Response Act (FFCRA) in March 2020. The program allowed students to receive benefits on a new or existing EBT card to replace the meals that they were missing when schools closed in response to the pandemic.¹

School meals are critical to student health and learning, especially for students from households with low incomes. Research shows that receiving free or reduced-price school lunches reduces food insecurity, obesity rates, and poor health.² For many students, school meals are the most nutritious meal they eat in a day, and for some, meals at school are the only meals they receive.³

In spring 2020, millions of students were either out of school or learning remotely.⁴ Pandemic EBT helped to fill the nutritional gap left by lack of access to school meals and had a large impact on addressing food insecurity. A study by the Brookings Institute found that among Supplemental Nutrition Assistance Program (SNAP) households, the program reduced food insufficiency by 28 percent.⁵ In spring 2020, school year 2020–2021, and summer 2021, approximately 29 million school-age students and 6.9 million younger children⁶ were eligible for P-EBT benefits, and U.S. Department of Agriculture (USDA) issued approximately \$39.1 billion in benefits.⁷

For the spring of 2020 and school year 2020–2021, states faced several challenges, including creating a program from scratch, finding a way to adapt that

History of P-EBT

MARCH TO JUNE 2020

The Pandemic Electronic Benefit Program was created in the Families First Coronavirus Response Act.

- ▶ The U.S. Department of Agriculture approved plans from **all 50 states, the District of Columbia, and the Virgin Islands** to distribute benefits.⁸
 - » **29.9 million students** received over \$10 billion in P-EBT benefits for the spring of 2020.⁹

SEPTEMBER 2020

- ▶ USDA allowed states to extend their spring 2020 plans to provide benefits for the 2020–2021 school year during the months of August and September.

OCTOBER 2020

- ▶ Congress passed a Continuing Resolution (CR) that extends P-EBT through the 2020–2021 school year and expanded the program to provide benefits to students attending schools operating with reduced attendance or hours (meaning students in hybrid learning — split their time between in-person and attending school virtually) in addition to students attending schools that are fully virtual.
- ▶ The CR also allowed states to issue benefits to children under the age of 6 whose households participate in SNAP in order to replace lost meals at child care.¹⁰
 - » In the 2020–2021 school year, **all 50 states, the District of Columbia, Puerto Rico, American Samoa, and the U.S. Virgin Islands** had approved plans for school-age students. Only three states, Mississippi, Idaho, and North Dakota, did not provide benefits for children under 6 on SNAP.

MARCH 2021

- ▶ The American Rescue Plan expanded the P-EBT program to cover summer periods for both school-age students and children under 6 on SNAP. States can provide P-EBT benefits to school-age students in the summer if at any point during the previous school year there was a Public Health Emergency Declaration related to COVID-19.^{11,12}

SUMMER 2021

- ▶ **Forty-nine states and the District of Columbia** were approved to distribute summer benefits to school-age students, and **47 states and the District of Columbia** were approved to distribute summer benefits to children under 6 on SNAP.
 - » Only **North Dakota** did not participate in Summer 2021 P-EBT.
 - » **North Dakota, Idaho, and Mississippi** all chose not to provide summer benefits to children under 6 on SNAP.

SCHOOL YEAR 2021–2022

- ▶ Most states and territories have been approved for at least one school year 2021–2022 plan (school-age or under 6), and more state approvals are expected.

SUMMER 2022

- ▶ Over half of states and territories have been approved to issue summer 2022 benefits, and more approvals are expected as nearly all states have expressed interest in providing benefits for the summer of 2022.

1 Families First Coronavirus Response Act, Pub. L. No. 116-127, Page 134 Stat. 179 (2020). <https://www.congress.gov/116/plaws/publ127/PLAW-116publ127.htm>.

2 Food Research & Action Center (2016). *Research Shows that the School Nutrition Standards Improve the School Nutrition Environment and Student Outcomes*. Available at: <https://frac.org/wp-content/uploads/school-nutrition-brief.pdf>. Accessed on July 7, 2022.

3 Let's Move, Obama White House (2010). *Healthy Schools*. Available at: <https://letsmove.obamawhitehouse.archives.gov/healthy-schools>. Accessed on July 7, 2022.

4 Education Week (2021). *Map: Coronavirus and School Closures in 2019–2020*. Available at: <https://www.edweek.org/leadership/map-coronavirus-and-school-closures-in-2019-2020/2020/03>. Accessed on July 7, 2022.

5 Brookings's Institute (2021). *An update on the effect of Pandemic EBT on measures of food hardship*. Available at: <https://www.brookings.edu/research/an-update-on-the-effect-of-pandemic-ebt-on-measures-of-food-hardship/>. Accessed on July 7, 2022.

6 These are estimates based on what states reported in their state P-EBT plans from spring 2020, SY 20–21, and summer 21. The number of children noted are the number of eligible children based on state plans, not the number who received benefits.

7 United States Department of Agriculture (2022). *Pandemic EBT Program Participation and Benefits — March 2022*. Available at: <https://www.fns.usda.gov/sites/default/files/resource-files/SNAPPEBTFY20throughCurrent-6.zip>. Accessed on July 7, 2022.

8 In the spring of 2020, Puerto Rico was not eligible to take part in P-EBT, but after the CR in October, the program was expanded to include them.

9 These are estimates based on what states reported in their state P-EBT plans from spring 2020.

10 Continuing Appropriations Act, 2021 and Other Extensions Act, Pub. L. No. 116-159, Page 134 Stat. 709 (2020). <https://www.congress.gov/bills/116/congress/house-bill/8337>.

11 American Rescue Plan Act of 2021, Pub. L. No. 117-2, Page 135 Stat. 4 (2021). <https://www.congress.gov/bills/117/congress/house-bill/1319/text>.

12 The plans for children under 6 on SNAP are tied to there being an active COVID-19 Public Health Emergency Declaration, and therefore, are not covered by this language.

program to address different learning modalities, and tailoring benefits to reflect the extent to which students missed out on school meals. Planning and implementing Summer P-EBT in 2021 proved to be much simpler than the school year issuances, because states can issue a standard benefit to all eligible children. The Summer P-EBT program only requires states to identify which students receive free or reduced-price eligible, and what their address is. For young children, it only requires states to identify children younger than 6 whose households participate in SNAP.

This report draws on responses from a survey sent to all state Supplemental Nutrition Assistance Program directors that asked questions about the provision of P-EBT benefits for the summer of 2021. It then takes lessons learned reported by states to make policy recommendations for a permanent nationwide Summer EBT Program and identifies best practices to support the implementation. The state survey also confirmed or corrected information included in each state's approved P-EBT plans. That data has been synthesized into state-specific one-pagers that are available on the [Food Research & Action Center's website](#).¹³

About This Report

Food Research & Action Center sent out an optional survey to SNAP directors in all 50 states and the District of Columbia to elicit feedback on different aspects of Pandemic EBT. Forty-four of those directors responded to the survey and gave insight into the challenges states faced and the best practices gleaned from the program. In addition, FRAC developed a summary of each state's plan to distribute P-EBT benefits for the summer of 2021. FRAC gave each state an opportunity to review the state summary and provide updates.

¹³ SNAP directors were given the opportunity to review and provide feedback on the state one-pagers. For more information on the methodology, please see the technical notes.





Lessons Learned

This section takes the high-level topics explored within our state survey and highlights the feedback received from states on the challenges within these areas. From there, the best practices for addressing those challenges in future rounds of P-EBT¹⁴ are highlighted for either states or for USDA. These lessons learned also can be incorporated into federal legislation to support the successful implementation of a nationwide Summer EBT Program.



Administrative Funding

In the implementation of P-EBT in the spring of 2020, states that administered the P-EBT program were required to cover half of the administrative costs following the SNAP administrative funding structure. Early into implementation, states expressed the need for additional federal funding to support the administration of P-EBT.¹⁵ Congress responded by providing funding to fully cover the states' administrative costs beginning with school year 2020–2021 through the Continuing Resolution enacted in October 2020.¹⁶

Through school year 2020–2021 and summer 2021, states reported struggling to fund staff and vendors to create and refine P-EBT plans, as administrative dollars were not available until the state's plan was approved. Regranting money was also reported as a challenge as the funding was awarded to the state SNAP agency, and it had to be re-granted in order to reach the child nutrition agencies, schools, and nonprofits, which could be a time-consuming process.

States acknowledged that as time went on and additional guidance was issued, the process did improve and became more accessible compared to the earlier issuances of P-EBT benefits.

States highlighted three important steps that would support program administration:

- ▶ providing seed money to states as they begin the process of writing their plan;
- ▶ simplifying the process for states to make adjustments to their request for administrative funds; and
- ▶ simplifying the process for regranting money, particularly to the child nutrition agencies and school districts.

¹⁴ The P-EBT program can be utilized for summer as long as there has been a COVID-19 Public Health Emergency (PHE) within the school year preceding it. This means that Summer P-EBT can be utilized next summer (2023) as the current PHE expires after the official start of the 22–23 school year.

Data Collection

To provide summer benefits, states needed to have a list of children who were eligible for free or reduced-price meals during the school year as well as a way to process applications for newly eligible children during summer break. Data collection for P-EBT has consistently been a challenge both for school districts and for the state. This is particularly true during the school year due to the difficulty in tracking individual student absences and different learning modalities. These challenges would not apply to a permanent Summer EBT Program, as all eligible students would receive the benefit.

“I was so very thankful for receiving the Summer P-EBT benefits; it meant so much to me to be able to take the burden off my shoulders of how I was going to feed my family for all the time they were off from school. I really would love to thank everyone who put this into motion. Thank you all from the bottom of my heart!”

— Heather, Pennsylvania

In the survey, states identified a few data collection challenges that would apply to a permanent Summer EBT Program. Schools have consistently struggled with inadequate staffing to fulfill Pandemic EBT data requests from the state and had difficulty processing school meal applications during the summer, as many school staff are off during the summer months. When data was provided by schools, states found that it was not always in the needed format to be used with their data systems, requiring re-formatting which contributed to students being missed for benefit issuance. Challenges with address verification were also reported in every P-EBT issuance. Cards were returned to the state when addresses were not accurate.

¹⁵ Center on Budget and Policy Priorities and Food Research & Action Center (2020). *Lessons From Early Implementation of Pandemic EBT*. Available at: <https://frac.org/wp-content/uploads/P-EBT-Documentation-Report.pdf>. Accessed on July 7, 2022.

¹⁶ Continuing Appropriations Act, 2021 and Other Extensions Act, Pub. L. No. 116-159, Page 134 Stat. 709 (2020), <https://www.congress.gov/bills/116th-congress/house-bill/8337>.

Additionally, due to the nationwide waivers, when schools reopened in fall 2020, almost all districts were serving free meals to all students using either the Summer Food Service Program or the Seamless Summer Option. This meant that schools were not collecting new school meal applications to certify students to receive free or reduced-price school meals. To overcome this access barrier, USDA’s guidance allowed schools to utilize 2019–2020 free and reduced-price status to determine P-EBT eligibility.

“[Summer P-EBT] is a god send ... it’s nice not to worry so much. So, thank [you] guys for everything.”
— Charla, Oklahoma

Most states reported in the survey utilizing a file transfer process to receive data from school districts, with 20 states reporting the creation of new data transfer systems between the schools and the SNAP agency or the education agency to the SNAP agency, and 18 utilizing existing data systems such as the October count data submission to glean relevant P-EBT data. Other states used methods such as manual submission by emailing Excel files to the state from the school district. Additionally, the majority of states reported giving school districts at least two weeks to process data requests before anticipated deadlines.

In order to improve data collections for a permanent Summer EBT Program, states can:

- ▶ share information and data requests well before anticipated deadlines with school districts to ensure they have time to process and comply;
- ▶ simplify the data submission process for school districts into a single system in a clear format; and
- ▶ create a state-level free and reduced-price meal application system utilizing administrative funding to make these mechanisms permanent.

Communications


With P-EBT being a new program, there was a tremendous need to develop clear communications and effective outreach to both schools and families. The survey found that many states created a dedicated website for P-EBT to disseminate information to eligible families, and the practice of sharing P-EBT information with community partners was widely utilized. Other strategies states reported included: sending letters or postcards to P-EBT recipients, disseminating press releases, leveraging social media, placing ads, offering materials in multiple languages (particularly critical to ensuring that all eligible families are able to utilize the benefits), hosting webinars for families, and sending out text message updates. States generally agreed that they relied heavily on their schools to share and communicate updates as the schools were seen as a trusted source of information by families.


There are a few key strategies that states identified in the survey as ways to support better communications, including:


- ▶ ensuring that schools are sharing materials with students, as they have a direct line of communications to students and families;
- ▶ disseminating information through multiple platforms (website, media, social media, flyers, webinars, etc.); and
- ▶ developing materials in multiple languages.

“You guys saved my family and I last year. We greatly appreciate all you guys have done for all of us in Oregon. I finally was able to get food to actually last almost the entire month [and] my kids haven’t had to sneak or be afraid to ask for an extra glass of milk.”
— Barbara, Oregon

Communicating with families and students can be even more difficult when students are in foster care, facing homelessness, or are part of immigrant families. Below are some of the best practices states utilized for each population.

 **FOR STUDENTS IN FOSTER CARE:** Issue cards in the names of individuals instead of sibling groups or families and work with caseworkers and foster families to ensure updated student information.

 **FOR STUDENTS FACING HOMELESSNESS:** Leverage McKinney-Vento coordinators to obtain the best address or to help distribute cards and utilize email, text, and social media to convey information around P-EBT.

 **FOR STUDENTS IN IMMIGRANT FAMILIES:** Translate P-EBT materials and resources into multiple languages; work with community-based organizations and individuals who are trusted messengers to spread the word about P-EBT in their community; and include language stating that P-EBT and school meals are excluded from a public charge determination in all communications to families.

Dispute Resolution

The P-EBT program leverages the systems of SNAP but is not a SNAP benefit; those who are not issued P-EBT benefits do not have the same recourses to challenge the ineligibility finding as they would for SNAP. Out of the states that responded to the survey, 15 stated that they utilized a formal dispute resolution process, and 28 indicated that they used an informal process. When it came to informal dispute resolution processes, states described different methods. Some pre-screened families for dispute eligibility prior to the family filling out dispute forms; some relied on schools to handle disputes, while others minimized asks of schools.



“Summer P-EBT 2021 came at a time when my children needed more money for food; we are very grateful for this help.”

— Chitlalt, Iowa

States that reported having success in dispute resolution processes, or resolving cases in a timely manner, described having specific training and materials for the staff handling cases. They had a clear process to handle and track the cases. This was important to ensure that the state could provide ongoing information to and answer questions from families about their eligibility for benefits. In states without a clear process, families would pursue multiple ways to obtain their benefits, which created additional administrative work and caused confusion for the state, underscoring the need for a clear and transparent tracking mechanism.

A few important steps that states can take to facilitate dispute resolutions:

- ▶ thoroughly train and provide written reference material to all call center staff (or school staff) to ensure dispute processes are followed and to ensure there is a standardized case escalation flow with appropriate approximate timelines for resolution; and
- ▶ create a centralized database to track all disputes and resolutions so there is a clear record.

Staffing

Going into the pandemic, many states were already short-staffed, and COVID-19 only exacerbated this problem. Implementing P-EBT was a new responsibility that fell to state government agencies already running other programs. Some states responded by hiring contractors to either handle or help handle P-EBT alongside their staff and some made do with only their existing staff. Two states responded that they only utilized contractors for P-EBT; eight responded that they only used SNAP department staff; and 29 said they used both. The number

of hours each staff member dedicated to P-EBT varied widely among the states; some dedicated staff to full-time work on P-EBT, whereas others spread P-EBT work across staff working on other programs. Some states had multiple individuals working full time on P-EBT; others had only one or two; and some had no one working on P-EBT full time. The range of staffing went from zero individuals fully dedicated to the P-EBT program to over 700 individuals.¹⁷

Through interviews with state advocates, it was also noted that P-EBT questions overburdened the infrastructure created for SNAP. By staffing separate call centers and hotlines specifically for P-EBT and any future Summer EBT Program, states can reduce the pressure on the SNAP systems.

The two most important staffing steps that states can take are:

- ▶ adequately staff the program by fully leveraging administrative funding, which also helps ensure timely issuances of benefits; and
- ▶ create additional infrastructure to serve families receiving P-EBT and Summer EBT families that is separate from the SNAP access points.

Leveraging Lessons Learned in P-EBT to Transition to Summer EBT

P-EBT has provided an important opportunity for states to prepare for a permanent Summer EBT Program. The P-EBT program required state child nutrition and SNAP agencies to work together and to create new data sharing practices in order to provide benefits to students. This was a challenge, as not only were lines of communication from the education agency to the SNAP agency limited, but data systems utilized by the agencies in most cases were different.¹⁸ This required some states to create new or compatible data transfer systems that allowed these agencies to co-lead a program together.

“[Summer P-EBT] helped my family put food in my house and fill my kids’ bellies. I hope you keep the program going for us families that don’t have money to get food for our kids.”

— Priscilla, North Carolina

States also indicated that in addition to having newly stored student data from past years, they now have a better understanding of how to manage the data. Stored data means states do not have to begin their summer lists again each summer, they can remove those no longer eligible and keep the bulk of the list intact. However, many of the data systems created for P-EBT were not designed for use on a permanent basis, as the systems have been set up to get benefits out quickly. Most of these states have had to issue each batch separately since the program’s inception.

When it came to what could be helpful for a Summer EBT Program, states generally supported the need for a more automated process for data processing and entry to make it more user-friendly and easier on schools. At the state level, respondents noted that address accuracy (i.e., requiring addresses be given in a way that is transmissible, or making an online portal for parents to update addresses) was important as well as increasing staffing.

Through interviews with state P-EBT advocates, it was noted that the switch from P-EBT to Summer EBT may be confusing for families. Additionally, in a 2021 survey of P-EBT families by MassInc. Polling Group, the organization found that 48 percent of those families participating in P-EBT, but not enrolled in SNAP, were unaware that they could use both programs simultaneously.¹⁹ They suggested that states launch clear communications and outreach campaigns to let families know if and when benefits are coming, how those benefits would be received (new card, existing EBT card, etc.), and how families can get additional nutrition help outside of P-EBT and Summer EBT.

¹⁷ This number includes the number of call center staff a state had.

¹⁸ Center on Budget and Policy Priorities and Food Research & Action Center (2020). *Lessons From Early Implementation of Pandemic EBT*. Available at: <https://frac.org/wp-content/uploads/P-EBT-Documentation-Report.pdf>. Accessed on July 7, 2022.

¹⁹ MassInc. Polling Group (2021). *Survey: P-EBT helped thousands of families access food, but as food insecurity remains high, other assistance programs are underutilized*. Available at: <https://www.massincpolling.com/the-topline/survey-p-ebt-helped-thousands-of-families-access-food-but-as-food-insecurity-remains-high-other-assistance-programs-are-underutilized>. Accessed on July 7, 2022.

Summer EBT

Summer EBT was initially funded through the Agriculture Appropriations Act of Fiscal Year 2010 (Public Law 111-80), which gave the USDA the authority to test innovative methods to reduce food insecurity during summer vacation, when children lose access to school meals. USDA launched Summer EBT in 2011, as a demonstration project in two states to test the impact of providing summer nutrition benefits through an EBT card to families with low incomes who have school-age children. In its first year, the program provided 12,500 debit cards to these families with a fixed dollar amount to purchase groceries during the summer months.

The pilot program was deemed successful as it decreased very low food security by 33 percent over the summer of 2011 and 2012.²⁰ Because of this success, Congress invested additional resources into Summer EBT through the annual appropriations process. Throughout the next few years, Connecticut, Michigan, Missouri, Nevada, Oregon, Tennessee, Texas, Virginia, and Wisconsin, and two Indian Tribal Organizations (the Cherokee Nation and the Chickasaw Nation) all ran pilot programs of Summer

EBT at different times, though none ever implemented the program statewide. These programs were found to reduce food insecurity and improve nutrition, and there were high rates of redemption of the benefits.²¹

Due to the success of the demonstration project, legislation has been introduced to make the program permanent. The Build Back Better Act was the latest piece of legislation to propose expanding the Summer EBT Program nationwide. While this bill has stalled, other bills also propose expanding Summer EBT.

The Stop Child Hunger Act of 2021 (S. 1831 / H.R.3519), introduced by Senator Patty Murray (D-WA) and Representative Mike Levin (D-CA), would provide a Summer EBT card to purchase food to families with low incomes who have children. This bill would build on the success of the Pandemic EBT Program and Summer EBT Pilot Program to provide additional support for families during the summer, school breaks, and unanticipated school closures. It would not replace school meals or the Summer Nutrition Programs.²²



Policy Recommendations for a Permanent Summer EBT Program

As Congress considers creating a nationwide Summer EBT Program, there are important policy options that would support a robust implementation, reduce the administration burden on states and school districts, and support better access to benefits. For the administrative recommendations, it is important to provide start-up funding to assist in the development of these systems:

- ▶ Allow states to develop a statewide National School Lunch Program application that can be completed online. This would provide an important opportunity to determine who is eligible for benefits, better support outreach to families, and ease some of the administrative work for school districts.

“I have two high school students, and it’s very hard when we lost the meals, having to look to find another source or way for them to eat. It’s a parent’s worst nightmare. I’m glad someone’s finally looking out for us.”

— **Candy, Kentucky**

- ▶ Support states with technology funding and technical assistance to develop a statewide portal that allows parents to check and update their address, helping to ensure that EBT cards reach families.
- ▶ Distribute EBT cards prior to the end of the school year to ensure that the cards reach families, which allows families to use their benefits at the start of the summer.
- ▶ Give states the option to work with schools to distribute the cards to help overcome the challenge of identifying the families’ correct address.

“During these last 20 months, the extra funding from P-EBT helped tremendously with steadily rising costs of food — my family needed the extra help ... I really wish there was a continuation of help with the uncertainty with the pandemic.”

— **Mitchell, Florida**

- ▶ State SNAP agencies should create a permanent, compatible interagency data system that can help automatically process student data and issue benefits, and funding should be provided to develop these systems.
- ▶ Allow states to provide the same benefit level to all eligible students in the state for the summer, based either on a nationwide average determined by USDA or on a state average calculated by the state agency.
- ▶ Allow student information to be easily shared among the Summer EBT state administering agencies and schools. An important component is to have agreements (MOU’s, data sharing agreements, etc.) in place among the agencies administering Summer EBT to ensure students’ confidentiality.
- ▶ Require states to set up strong communications systems that include outreach and guidance to families on how to access the benefits and provide administrative funding to support these efforts.
- ▶ Standardize processes for families that are eligible but do not receive benefits to rectify their situation.

“I was struggling not knowing when our next meal would be. When they did notify me [about Summer P-EBT], I called to make sure I wasn’t dreaming; I cried on the phone to the operator. Thank you so much for your gift; my family has been so blessed. Thank you.”

— **Adriana, New Mexico**

²⁰ United States Department of Agriculture (2016). *Summer Electronic Benefit Transfer for Children (SEBTC) Demonstration: Summary Report 2011–2014*. Available at: <https://fns-prod.azureedge.us/sites/default/files/ops/sebctfinalreport-summary.pdf>. Accessed on: July 7, 2022.

²¹ Food Research & Action Center (2021). *The Summer Electronic Benefit Transfer Program (Summer EBT)*. Available at: <https://frac.org/wp-content/uploads/frac-facts-summer-ebt-program.pdf>. Accessed on July 7, 2022.

²² Food Research & Action Center (2021). *Support the Stop Child Hunger Act of 2021*. Available at: <https://frac.org/wp-content/uploads/CNR-Stop-Child-Hunger-2021.pdf>. Accessed on July 7, 2022.

Technical Notes

FRAC sent a survey to assess the implementation of P-EBT benefits for the summer of 2021 to the SNAP director in all 50 states and the District of Columbia. Survey questions asked about the application process, implementation challenges, successful practices, and outcomes. Forty-four states (or 43 states and the District of Columbia) responded to the survey, though not all states answered all questions posed. The answers were then compiled. Common themes and responses were identified and used to complete this report. There were seven states that did not respond to the survey: Alaska, Arkansas, Florida, Indiana, Nevada, New Hampshire, and South Dakota.

To compile the state fact sheets, all data was drawn from the approved school year 2020–2021 and summer 2021 plans that are posted on the [USDA Food and Nutrition Services website](#). As part of the survey, states were given the opportunity to review and update the information in their state fact sheets. FRAC incorporated all edits provided by states into their state fact sheet.

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