



Summer EBT: Application and Database Best Practices From 2024

Introduction

The Summer Electronic Benefit Transfer (Summer EBT) Program provides families with \$40 a month per eligible child¹ to help with food costs during the summer months. Families can receive benefits through one of two pathways: automatic issuance or through an application.

Automatic issuance — or streamline certification — is the most direct pathway to Summer EBT and applies to any student that is: (1) certified for free or reduced-price school meals through a National School Lunch Program (NSLP) application, or (2) directly certified for free or reduced-price school meals through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or Medicaid (in most states), as well as children who are homeless, migrant, or in foster care. For more information, see FRAC's [*Guide to Summer EBT Eligibility*](#).

Students who do not meet the criteria above may be eligible via an application. In 2024, states² were not required to have a statewide Summer EBT application. Instead, many states utilized school meal applications or alternative household income applications — applications typically used to gauge income levels in schools using the Community Eligibility Provision — that were either submitted to the school district or the state agency.

States are required to have a statewide application form for summer 2025, and they cannot compel school districts to process those applications, though they may enter into paid contracts with schools to do so. Having an application form that is easy to understand, simple to fill out and submit, and that is easily accessible is vital for states to ensure that all families eligible for Summer EBT receive the benefit.

Another new requirement for 2025 is that states must have a database of NSLP students. This database must have at minimum, a child's name, date of birth, the school or school district in which they are enrolled, mailing address, and their individual free or reduced-price meal eligibility status. These databases are intended to make the process of benefit issuance more accessible and to lessen the burden of data sharing between school districts and the state agency.

¹ The Summer EBT benefit is higher in Alaska, Hawaii, and the U.S. territories.

² The statewide application and statewide database requirements apply to all Summer EBT administering agencies, including states, territories and Indian Tribal Organizations (ITOs). This case study focuses on lessons learned from state administering agencies.

Implementing best practices, such as robust outreach plans to promote the program and applications, having translations of applications available, and giving families options when it comes to filling out and submitting those applications, is vital in ensuring widespread access to Summer EBT. This is particularly important after Congress made significant cuts to SNAP and Medicaid, which will reduce the number of children that are being directly certified for Summer EBT without an application. As more children lose access to programs such as SNAP and Medicaid, more children will need to complete a Summer EBT application to access these benefits.

This case study aims to present the best practices for program applications and databases, and different pathways for states to fulfill 2025 requirements. By creating a strong, intuitive application form, states can maximize accessibility and lessen the administrative burden of the program by creating a lasting database.

Methodology

Representatives from two state agencies were interviewed virtually by the Food Research & Action Center (FRAC) for this case study:

- Vermont Department for Children and Families
- California Department of Social Services

Information presented by the following state agencies and organizations during January 2025 FRAC webinars, [Summer EBT Deep Dive: Strategies for Creating a Strong Application](#) and [Summer EBT Deep Dive: Creating Lasting Databases](#), was also utilized:

- Connecticut State Department of Education
- Michigan Department of Education
- Nutri-Link Technologies, Inc.
- Virginia Department of Social Services

Summer EBT Applications: What Is Required

To maximize the likelihood of families filling out and submitting applications, U.S. Department of Agriculture (USDA) aimed to keep Summer EBT applications as simple as possible. Only three pieces of information are required for an application to be considered complete:

1. names of children and other household members;
2. amount, source, and frequency of income for each household member; and
3. signature of an adult household member, which can include electronic signatures.

While states do have the flexibility to ask for other information on the application, there must be a way for families to opt out of answering those questions, and if they are not filled out, the application must still be considered complete. Optional information can include mailing addresses, date of birth, child's school, and last four digits of their social security number.

When a family is required to complete an application to access benefits, compared to being streamline certified, there is an increased likelihood that children will fall through the cracks. Most states reported higher than anticipated numbers of children who were streamline certified in summer 2024, while application return rates were lower than expected. In some states, this was a result of minimal outreach to families and the applications being hard to access. In other states, the application was only allowed to be mailed in, which wasn't as convenient as being able to also submit the form online or in person.

Developing Applications

Details about the options that states have for developing Summer EBT applications are included below.

- **Nutri-Link Application Through USDA**

Starting in 2024, USDA [announced a contract](#) with the company [Nutri-Link](#) that would allow states to create applications for Summer EBT at no cost. States and Indian Tribal Organizations (ITOs) that decide to utilize this technology would enter into contracts directly with Nutri-Link to design and collect applicant data. The applications comply with USDA requirements and allow for customization by states to include elements that work for their populations, including instant translations and instant help features. In 2024, six states took advantage of this opportunity to create their own application at no cost, with 11 others considering the option for future summers.

Connecticut was one state that chose to utilize the Nutri-Link option in 2024. The Connecticut state agencies found many benefits to utilizing the Nutri-Link technology, particularly as it was available at no cost to the state. The application could be customized, which allowed the state to: translate the application into multiple languages; include guidance on whether a family needed to fill out an application; provide instructions for each of the application sections; and allow an income determination to be made immediately after submission. Many states do not have the capacity to create an interactive online application that allows for such functionalities, which has resulted in states choosing to utilize Nutri-link.

- **Other Application Systems**

Another option for states is to contract with private companies to develop an application. This option can be helpful for states that either already contract with companies for other applications or for states that do not have the capacity to create an application in-house. Hawaii is one example of a state that contracts with a private company to create a Summer EBT application.

- **In-House Applications**

For summer 2024, many states chose to use an application that was either repurposed from a school meals application or one that was created by the state agency. While the Nutri-Link option allows states to create an application at no cost at present, there is concern that if the USDA contract ends, states would then need to cover the cost of an application platform. If a state chooses to create their own application, they can control how long it is used.

Additionally, states can respond more quickly when changes need to be made to the application. Due to long timelines sometimes tied to procurement and contracting with private contractors, some states have also decided that building out new systems in-house is more efficient.

Vermont set up its own application system prioritizing customer access as well as integration into existing case management systems with access for call centers. The state's application uses simple language that can be completed online through a computer or mobile phone. The system also allows the state to respond when applicants call in about their application and shows staff when the application was completed and the status, including if additional information was needed. This system also allows for automatic notice generation for families. The state is hoping to eventually include automatic approvals if families complete the application and are eligible for benefits.

For states looking to use their own system but without current capabilities to build out a new system, there are ways to work through that. For example, Virginia did not have an online submission option for summer 2024, but it did have a paper application that could be completed, printed, and mailed in, as well as the option to complete an application over the phone. The state made the application simple by only including what USDA required a state to ask on an application, making it only a single page, ensuring a smaller burden for families. The state also made the application available in six languages, and when possible, gave examples of the information they were looking for in the different fields.

Summer EBT Databases

As part of the regulations for Summer EBT, USDA requires that states have a statewide database for all children enrolled in NSLP or School Breakfast Program (SBP) schools within the state beginning in 2025. This database can allow for a reduction in benefit duplication, enrollment of children who fill out a Summer EBT application into the NSLP or SBP (if applicable), and/or create a master list of NSLP and SBP eligible children for automatic benefit issuance.

This database must have at minimum, a child's name, date of birth, the school or school district in which they are enrolled, mailing address, and their individual free or reduced-price eligibility status.³

Repurposing Existing Databases

Many states already have a similar database that meets these requirements or that can be repurposed to fit these requirements. The state of Michigan has had an educational database for many years that has been repurposed to fulfill the Summer EBT database requirements. The state already collected data multiple times a year for public schools, and once a year for non-public schools through this database.

By utilizing existing databases for Summer EBT, states can avoid a manual data collection process that increases the administrative burden on both the state and the school.

³ In the first year of implementation, there were issues in some states with rectifying Family Educational Rights and Privacy Act (FERPA) regulations with Summer EBT regulations. The U.S. Department of Education (USDOE) has since [released a letter](#) providing exceptions to pieces of FERPA to allow states to align with Summer EBT regulations.

Building a New Database

Many states did find that they needed to create a new database specifically for Summer EBT. One of these states is Vermont, as the state saw the opportunity to build out a database that is linked to its customer service and eligibility systems, and the Summer EBT application. This means Vermont can easily deduplicate data and flag applications that are identified as duplicates. The automated issuance runs smoothly as all the systems can talk with one another since the application and database were specifically designed for integration with their case management system.

Conclusion

Summer EBT is a proven method to reduce food insecurity and increase nutrition during the summer months when students lose access to school meals. To maximize participation in the program, states must ensure that the program is accessible to all eligible students. One way they can do this is to follow best practices when it comes to creating a statewide application. Another is to ensure that their internal processes for streamline certification capture as many children as accurately as possible, which is where a Summer EBT database can be helpful. By ensuring all eligible children receive the benefit, states can help make the Summer EBT Program a success, resulting in a decrease in summer hunger.