



Summer EBT in Indian Country: A Report on Tribal Success, Barriers, and Best Practices



FRAC
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Introduction

In summer 2024, two Tribes, the Chickasaw and Cherokee Nations, administered the Summer Electronic Benefit Transfer (Summer EBT) Program. With the tribes' combined efforts, residents in their jurisdictions had access to grocery benefits during the summer months through the program.

Food insecurity rates in Indian Country are more than double the national average.¹ Tribally administered nutrition programs like Summer EBT are essential in providing access to nutritious foods for children and families who need it most. Since the program's implementation, recipients in Oklahoma reported lower levels of food insecurity and more adequate access to fruits and vegetables during the summer than nonrecipients.

This document serves as an introduction to Summer EBT and an analysis of the current legal framework. It highlights barriers identified by tribes in addition to offering lessons learned and best practices from Chickasaw Nation. It underlines the profound positive impact of this program, highlights tribal success, and identifies ways to improve the process for future tribal participation in the program.



¹ Sara Usha Maillacheruvu. (October 4, 2022). The historical Determinants of Food Insecurity in Native Communities. <https://www.cbpp.org/research/food-assistance/the-historical-determinants-of-food-insecurity-in-native-communities>



What is Summer EBT?

Summer EBT, also known as SUN Bucks, is a program funded by the U.S. Department of Agriculture (USDA) that provides grocery benefits for families with eligible school-age children when school is out during the summer months. Families get \$40 a month per child in either a lump sum of \$120 or three \$40 payments given each month. Children are eligible for this program if they receive free or reduced-price school meals through the National School Lunch Program or School Breakfast Program, or if their household already participates in means-tested programs like the Supplemental Nutrition Assistance Program (SNAP), the Food Distribution Program on Indian Reservations (FDPIR), Temporary Assistance for Needy Families (TANF), or in most states, Medicaid.

Children can receive Summer EBT benefits in addition to other benefits available to them, such as SNAP, FDPIR or the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Families can use these benefits to purchase food from authorized retailers in participating tribes, states, and territories. Authorized foods include fruits and vegetables, meat, poultry, fish, dairy products, breads, cereals, snack foods, and non-alcoholic drinks.²

The Agriculture Appropriations Act of Fiscal Year 2010 funded the precursor to Summer EBT. It provided USDA authority to test methods to reduce food insecurity during the summer. The Summer EBT demonstration projects were first launched in 2011 to evaluate whether providing summer nutrition benefits through an EBT card to families with low incomes who had school-age children could help close the hunger gap faced by children who lose access to free or reduced-price school meals during summer breaks. After the success of the demonstration projects, Congress established permanent, nationwide Summer EBT through the Consolidated Appropriations Act of 2023.³

² USDA FNS. (March 31, 2025). SUN Bucks (Summer EBT). <https://www.fns.usda.gov/summer/sunbucks>

³ USDA FNS. (March 2024). Evaluation of the 2019-2022 Summer EBT Demonstration. <https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-sebt-2019-2022-report.pdf>



When the pilot version of Summer EBT was first launched in 2011, participating programs served approximately 12,500 families. By 2018, projects were operating in eight states (Connecticut, Michigan, Missouri, Nevada, Oregon, Tennessee, Texas, and Virginia) and two tribes (the Cherokee Nation and the Chickasaw Nation).⁴ For the 2019 cycle, USDA released applications for states to operate Summer EBT programs for three consecutive years with priority given to new states and Indian Tribal Organizations (ITOs).⁵

From 2021–2023, three ITOs (The Chickasaw Nation, the Cherokee Nation, and the Inter-Tribal Council of Arizona) distributed Summer EBT benefits through the demonstration project funding.⁶ Finally, in December of 2022, Congress passed the Consolidated Appropriations Act of 2023, which authorized a nationwide, permanent Summer EBT Program to begin in summer of 2024.⁷



⁴National Governors Association. (December 12, 2024). SUM Bucks Basics for Governors: A Summer EBT Program Primer.

<https://www.nga.org/publications/sun-bucks-basics-for-governors-a-summer-ebt-program-primer/>

⁵USDA FNS. (March 2024). Evaluation of the 2019-2022 Summer EBT Demonstration. Page 2. [https://fns-](https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-sebt-2019-2022-report.pdf)

[prod.azureedge.us/sites/default/files/resource-files/ops-sebt-2019-2022-report.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-sebt-2019-2022-report.pdf)

⁶USDA FNS. (March 2024). Evaluation of the 2019-2022 Summer EBT Demonstration. Page 2. [https://fns-](https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-sebt-2019-2022-report.pdf)

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⁷Food Research and Action Center. (May 2024). The Summer Electronic Benefit

Transfer Program (Summer EBT). <https://frac.org/wp-content/uploads/frac-facts-summer-ebt-program.pdf>



Need for Summer EBT in Indian Country

To provide necessary programs and services directly to their citizens and others within their reservations, some tribes choose to administer select federal nutrition programs. While not all federal nutrition programs explicitly make ITOs eligible for program administration, the Summer EBT Program does.⁸ However, only ITOs participating in WIC are eligible to administer the Summer EBT Program.⁹

The Summer EBT Program helps fill a vital gap for children facing food insecurity during the summer months. Nearly 14 million children faced hunger in 2023. According to USDA, one in every five children is unsure where they will get their next meal.¹⁰ In 2022, approximately 13 percent of all U.S. households were food insecure. At the same time, the rate of food insecurity for American Indian/Alaska Native (AI/AN) households was 28 percent, more than double the national average.¹¹ Tribally administered Summer EBT plays a vital role in addressing food insecurity.



⁸42 U.S.C. 1762

⁹ 42 USC §§ 1762(a), (h)(1)

¹⁰ Feeding America. Facts about child hunger. <https://www.feedingamerica.org/hunger-in-america/child-hunger-facts>

¹¹ United States Government Accountability Office. (July 2024). Tribal Food Security: Opportunities Exist to Address Challenges in Federal Nutrition Programs. Page 10. <https://www.gao.gov/assets/gao-24-106218.pdf>



Program Execution

In the summer of 2024, both the Cherokee Nation and Chickasaw Nation chose to administer Summer EBT. Both Nations also cooperated with the Muscogee Nation to provide service within the Muscogee Nation's jurisdiction.¹² According to the Urban Institute, Indian Tribal Organization-administered Summer EBT was successful in improving participant nutrition. Program recipients reported lower levels of food insecurity at 65 percent compared with eligible nonrecipients at 82 percent. Additionally, 82 percent of recipients reported having adequate access to fruits and vegetables during the summer, while only 57 percent of eligible nonrecipients said the same. Nearly 75 percent of recipients agreed that the Summer EBT Program helped free up funds to purchase other food items for their household. Five ITOs — Cherokee Nation, Chickasaw Nation, Choctaw Nation, Muscogee Nation, and Otoe-Missouria Tribe — are administering Summer EBT for 2025.¹³



¹²USDA FNS. (March 3, 2025), 2024 SUN Bucks Implementing States, Territories, and Tribes.

<https://www.fns.usda.gov/sebt/implementation>

¹³ Emily Gutierrez, Baris Tezel, and Poonam Gupta. (February 27, 2025). Oklahoma Summer EBT Recipients Report Lower Food Insecurity, but Access Remains Unequal. Urban Institute. Page 2. <https://www.urban.org/sites/default/files/2025-02/Oklahoma-summer-EBT-recipients-report-lower-food-insecurity.pdf>.

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Chickasaw Nation Case Study





1. Did you participate in the pilot program for Summer EBT? If yes, in which years?

Yes. We participated in the pilot for 12 years, beginning in 2012. We were able to transition to the permanent version of the program in 2024 and ensure continued service to our participants.

2. How did participation in the pilot phase inform your 2024 implementation?

It influenced our 2024 implementation in every way. Participation in the pilot program created space for steady and sequential growth. It allowed us the space to build relationships with schools and add grocery store vendors in a sustainable way.

3. What nutrition programs were you running previously? How did Summer EBT build off those programs?

The Chickasaw Nation prioritizes improving the lives of our citizens and our surrounding communities, particularly through providing essential food access. The Chickasaw Nation operates a number of nutrition programs including WIC, FDPIR, SNAP Education, Summer Food Service Program, the Child and Adult Care Food Program (CACFP), and the tribally created Packed Promise program. Our history of administering WIC has had a substantial influence on our Summer EBT programming, as we are currently utilizing a WIC model.

¹⁴ However, we learned lessons from each and every nutrition program that informed our Summer EBT implementation.

4. How many students did you reach with benefits in summer 2024? How many children were eligible?

In summer 2024, Chickasaw Nation served 47,000 students in the Chickasaw Nation service area. By working in partnership with the Cherokee Nation and Hunger Free Oklahoma, an additional 93,000 students were served in the Muscogee Nation. Chickasaw Nation served 27,000 of those students in the Muscogee Nation, the Cherokee Nation served the remaining 66,000 students. This collaborative partnership allowed us to reach the vast majority of the 150,000 students eligible in both areas.

¹⁴ In ITOs, Summer EBT is administered utilizing this model. Instead of \$40 per month on an EBT card, children receive a combination of a food package and a cash value benefit that equals the \$40 per month value.



5. How many school districts did you collaborate with? What was your experience working with school districts?

We collaborated with 262 total school districts — 181 in the Chickasaw Nation Service area and another 81 in the Muscogee Nation. We are incredibly grateful for our partnership with each of the school districts and their commitment to working with us to ensure program access for the students. Through our work, we found Memorandums of Understanding, or MOUs, were great tools to establish our working relationships with school districts. While there is some administrative burden to the continued drafting and review of 262 MOUs, it allows us to work directly with the schools to access information that we are not currently accessing through our state partners. These MOUs create a shared understanding of our roles and goals in serving all of our students.

6. What was the experience like working with state and local agencies to implement this program? How could USDA help facilitate improvements in your relationship or set standards around collaborations with state and local agencies?

Chickasaw Nation is in a unique position. We have close working relationships with many of our partners working on state-administered nutrition programs due to our years of collaboration. While we had some opportunity to work together on this program, there is significant room to expand that partnership, particularly in the realm of information sharing. We look forward to further developing our partnership as we move forward in providing Summer EBT.

USDA could facilitate tribal/state interactions across the country by offering technical assistance to all parties and creating access points to statewide databases to ease program eligibility and application processes.





7. What were the biggest challenges you faced in implementing Summer EBT in 2024?

The first priority for the Chickasaw Nation is always to enhance the overall quality of life of the Chickasaw people. Administering Summer EBT allows the Chickasaw Nation to serve that mission by providing food access to our citizens and residents of surrounding communities, so we were happy to undertake this program. However, we did have to navigate some challenges in implementation. First, the 50 percent administrative match can be a financial burden to many entities. We are lucky to have wonderful partners and supportive tribal leadership to help us meet this requirement. Second, we have found that the typical USDA FNS (Food and Nutrition Service) programmatic cycle does not align with our tribal budget cycle. Again, we are grateful to our leadership for working outside of their regularly scheduled process to move this program forward.

Finally, there is ample opportunity to grow our work with state partners. The Oklahoma Department of Education maintains a database of students who would be program-eligible across the state. At present, we do not access that database. Instead, we work with individual school districts to reconstruct the same information. That process adds an additional administrative burden and slows the eligibility and application process significantly. We are grateful to our partners and to other tribes who have helped to rebuild this set of information and find alternative pathways to ensure all eligible children have access to the program. Data-sharing agreements that properly account for tribal sovereignty and protect all interested parties could greatly streamline eligibility checks for our program staff and program access for our participants.

8. What went well in summer 2024?

The partnership amongst tribes and our trusted non-profit partner, Hunger Free Oklahoma, is incredible and continues to this day. The program owes its success to the commitment, collaboration, and tireless work from tribes across the state. We were able to come together almost immediately and leverage our long-standing relationships and partnerships to ensure that children across our service areas had access to essential foods through this program. In addition, we were able to leverage our existing internal infrastructure and 12 years of pilot program experience to facilitate the transition to Summer EBT permanence.



9. What are the benefits/advantages you saw as a result of participating in Summer EBT in 2024?

For our families and communities, the benefit was clear. This program creates access to food for students who need it most during a time when they feel the absence of school meals. Also, we are proud that people in our area see the Chickasaw Nation as a first stop for resources and support. Participating in Summer EBT allowed us to put another tool in our toolbelt for improving the lives of our citizens and community members and created ease of use for participants who may already be working with our tribe to access other relevant programs. Administering Summer EBT also served to infuse money into our local and rural economies. We added a number of WIC-authorized stores to our program, and those stores saw direct business engagement and growth as a result of Summer EBT in our area.

We also saw benefits for our tribe's broader operations. Our work on Summer EBT increased awareness across the Chickasaw Nation's vast network of the positive impact of this program and expanded support for nutrition programming across tribal operations. We found opportunities for efficiency in our technology. Finally, we had the opportunity to establish and grow partnerships with other entities also committed to feeding children across the state which built upon and bolstered each entities' strengths.

10. Did your tribe utilize an application system? If so, can you describe the application process and any challenges or best practices that you found? If not, do you have plans to create one?

In earlier years of the pilot, we utilized an active application program. As the program transitioned to permanence, we have moved to a passive consent model.¹⁵ We were able to grandfather in applicants from previous years in the first year of permanence. We continue to implement a passive consent model in which school districts provide free and reduced school-meal data directly to the Summer EBT Program so that families do not need to complete an application. In addition, Chickasaw Nation offers an online application and provides application assistance over the phone, or families may complete a paper application. Having multiple pathways allows us to meet potential participants wherever they are.

¹⁵In a passive consent model, families are automatically enrolled in a program and issued benefits unless they indicate they do not wish to participate.



11. What strategies and steps would you recommend to tribes that are considering implementing Summer EBT?

We learned many lessons during the pilot program and the transition to permanent Summer EBT. First and foremost was the importance of planning and slow scaling where possible. ITOs have the opportunity to take advantage of a planning year as they gear up their programs. Tribes should also consider advance planning for budget processes within their own governance structure and carefully consider the source of their administrative match dollars. Planning and resource gathering should start as early as possible.

It is also essential to consider technology requirements, and existing or additional grocery store contracts. Administering this program may require shifts in vendor contracts or entirely new vendor contracts depending on a tribe's current circumstances.

Building relationships with school districts is an essential piece of delivering this program. Those relationships take time, so begin that process early.

Call on your tribal partners. Each tribe is unique, but there are some common resources and lessons learned we have had the opportunity to share with one another. Inter-tribal collaboration can be an incredible source of information and support as tribes work to stand up their own program.

12. Were there any statutory or regulatory hurdles that caused setbacks in the process, and how do you think those could be adjusted to make it more navigable in the future?

The administrative-matching requirement creates a significant financial barrier for tribes interested in administering the program. Opportunities for reduction or a waiver would help to mitigate that barrier.

The enabling statute defines a covered Indian Tribal Organization as an “Indian Tribal organization that participates in the special supplemental nutrition program for women, infants, and children.”¹⁶ Tribes all over the country operate a variety of nutrition programs successfully. Limiting covered ITOs to only those participating in WIC leaves many tribes out of the program.

¹⁶42 USC §§ 1762(h)(1)



Through the pilot program, Chickasaw Nation had a chance to build and grow our program over a number of years, which contributed to our success. Tribes can still take advantage of one planning year under the current program structure. Some entities may prefer more time to stand up this program, particularly if they are starting from scratch.

Reporting for Summer EBT is based on a SNAP model. It does not align with existing tribal reporting systems or past reporting experience. Shifting reporting mechanisms to align with the reality of tribal administration and leverage existing tribal reporting structures would greatly streamline the process.

At present, the plan of management process requires two separate submissions during the year. This duplication creates additional administrative burden. In instances where there are no substantial changes between the first and second submission, streamlining that process would reduce administrative burden and speed up the process.

13. Is there anything we didn't ask about that you would like to share?

Tribal-specific support and technical assistance are essential. Tribal administration of Summer EBT is essentially different from state administration. While each tribe is unique, we have the opportunity to support one another in ways that USDA or more state-focused organizations cannot in the implementation of Summer EBT.





Summer EBT Consideration for Indian Country

As the Summer EBT Program expands nationally, it raises unique considerations for Indian Country, where tribal sovereignty, program eligibility, and access challenges intersect. Congress limited eligibility to administer Summer EBT to only those ITOs participating in WIC.¹⁷ Out of 574 federally recognized tribes, only 33 ITOs currently administer WIC.¹⁸ Other tribes participate in WIC as local agencies or other contributing partners. A tribe may choose not to administer WIC for various reasons but may be well-positioned to operate other nutrition programs. As legislation limited ITOs eligibility to only those participating in WIC, most tribes are effectively excluded from choosing to participate in Summer EBT. Because the administrative eligibility requirement is set by statute, Congress would have to amend the statute to allow broader tribal participation in Summer EBT.

Any entity administering Summer EBT must submit a plan of operation and management to USDA. This includes plans for cooperation between ITO-administered and state-administered programs.¹⁹ Ideally, these plans serve to streamline information sharing and to prevent dual participation. However, issues can arise if a state will not or is unable to adequately cooperate. The current statute, rules, and guidance governing Summer EBT do not require non-administering states to cooperate with ITOs or outline alternative pathways for ITOs to access information and streamline service delivery.²⁰ An absence of cooperation and coordination from other agencies in their service area can hinder an administering agency's ability to implement the program. Facilitating and supporting multiple pathways for information sharing and coordination can alleviate some of these hurdles.



¹⁷ 42 USC §§ 1762(a), (h)(1)

¹⁸ USDA FNS. (March 19, 2025). WIC MIS and EBT System Providers. <https://www.fns.usda.gov/sso/wic/providers>

¹⁹ 7 CFR 292.8 (e)(8)

²⁰ USDA FNS. (April 19, 2024). Establishing the Summer EBT Program and Rural Non-Congregate Option in the Summer Meal Programs. Interim Final Rule. <https://www.federalregister.gov/documents/2024/04/19/2024-08369/establishing-the-summer-ebt-program-and-rural-non-congregate-option-in-the-summer-meal-programs>



The Summer EBT Program was designed with state governments in mind rather than tribes. The state-centric structure overlooks the distinct nuances and circumstances of ITOs, which operate under different legal and administrative frameworks. ITOs have distinct governance structures and may face resource considerations states do not. The application of the Summer EBT model through the realities of tribal governance and infrastructure creates additional hurdles for tribes to access the program, which undermines their effort to address food insecurity and support families in need. Both statutory changes and regulatory updates would be necessary to remove barriers preventing full tribal participation. Statutory amendments could change the foundational rules, while regulatory updates could address the implementation details to ensure Summer EBT is locally responsive and works smoothly in the context of tribal governance. Statutory changes could include explicitly authorizing ITOs to administer Summer EBT and/or waiving or reducing the federal matching requirement for ITOs, recognizing their unique funding limitations. Examples of regulatory changes include streamlining documentation requirements that burden smaller ITOs with limited administrative staff and allowing greater flexibility in defining allowable administrative costs to reflect the realities of operating in remote or rural areas.





Both statutory changes and regulatory updates would be necessary to remove barriers preventing full tribal participation. Statutory amendments could change the foundational rules, while regulatory updates could address the implementation details to ensure Summer EBT is locally responsive and works smoothly in the context of tribal governance. Statutory changes could include explicitly authorizing ITOs to administer Summer EBT and/or waiving or reducing the federal matching requirement for ITOs, recognizing their unique funding limitations. Examples of regulatory changes include streamlining documentation requirements that burden smaller ITOs with limited administrative staff and allowing greater flexibility in defining allowable administrative costs to reflect the realities of operating in remote or rural areas.





Under federal statute, USDA Food and Nutrition Service will provide any administering Summer EBT agency with 50 percent of their approved administrative costs. The Summer EBT agency is responsible for the remaining 50 percent.²¹ Agencies can meet the matching requirement with tribal or state funds, cash or in-kind contributions from non-federal public institutions, or third-party donations. Acceptable non-federal sources include general tribal or state funds, local tax revenue, and the documented value of in-kind contributions such as donated space, equipment, or supplies.²² The federal match requirement can be unduly burdensome on ITOs, many of which operate with limited discretionary funding and already face resource constraints. Unlike states, ITOs have fewer opportunities to leverage local tax revenue or other non-federal funding sources. Additionally, securing and documenting in-kind contributions to meet the match can place a significant administrative strain on smaller ITOs.



²¹ 7 CFR 292.20(c)

²² 7 CFR 292.20(e)



Chickasaw Nation highlighted tribal-specific considerations around reporting requirements for Summer EBT, coordination with other agencies, and technical assistance. Current Summer EBT reporting is based on the SNAP model, which does not align with tribal reporting systems, nor the reality of administration for ITOs. Further, the Chickasaw Nation highlighted the hurdles it faced due to a lack of information-sharing with its state partners. ITOs do not necessarily have access to the same data sets or information as state agencies. Data-sharing agreements that incorporate tribal sovereignty and protect all interested parties may be necessary to streamline program administration.

Tribal-specific support and technical assistance are essential. Tribal administration of Summer EBT is fundamentally different from state administration. While each tribe is unique, those participating in Summer EBT have relied on the partnership and support from each other to bolster their program implementation. While state-administering agencies had more access to appropriate support from FNS and other partners, ITOs faced the additional burden of creating their own resource systems. Where FNS and other partners have not been able to effectively meet tribal-specific technical assistance and support needs, ITOs have worked to fill that gap for one another. Technical assistance, from FNS and other partners, must be tailored and responsive to unique tribal needs to effectively support expanded program administration.





Conclusion

Already, tribally administered Summer EBT programs have improved food security for children, especially in tribal jurisdictions where need is often high, and food access can be limited. Tribes face additional structural and regulatory hurdles not felt by states. Despite the additional barriers, tribes currently administering the program are doing so effectively, demonstrating both expansive capacity and commitment to serve their own citizens and other families within their service areas. However, limits on agency administration eligibility, administrative match requirements, data-sharing concerns, the lack of tribal-specific technical assistance, and more limit wider tribal participation in the program. Changes to both the statutory and regulatory framework would enable more tribes to administer the program in a way that is responsive to their citizens' needs and reflects their governmental strengths. Removing these barriers must be paired with a system of technical assistance and programmatic support that is responsive to the realities of tribal program implementation. In combination, these efforts can support consistent access to nutritious food during the summer months for those children and families who need it most.

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