



Supporting ITO Implementation of Summer EBT Through Data Partnerships: Strategies From Hunger Free Oklahoma

In 2024, during the first year of program operations, two Indian Tribal Organizations (ITOs) administered the Summer Electronic Benefit Transfer (Summer EBT) Program – Cherokee Nation and Chickasaw Nation. By 2025, administration of Summer EBT expanded to include three additional ITOs – Choctaw Nation, Muscogee Creek Nation, and the Otoe-Missouria Tribe – reflecting growing Tribal interest and capacity to administer the program. Notably, to date, all ITOs that have implemented the permanent Summer EBT Program have been in Oklahoma, underscoring the state’s unique network of Tribal and nonprofit collaboration. Since the first summer of the program, [Hunger Free Oklahoma](#), an anti-hunger nonprofit, has been [working alongside ITOs](#) administering Summer EBT to help support implementation.

Hunger Free Oklahoma has outlined how they helped build relationships, facilitate data collection, and ultimately, contract with ITOs to process and submit data to the EBT vendor.

Replicable strategies for organizations supporting ITO Summer EBT implementation include:

- **Leverage existing connections with school districts where ITOs have less day-to-day interaction, to help create lines of communication and build trust.** ITOs can provide benefits to all children that reside within their service area, not just those that are Tribal members. Many ITOs have strong relationships with school districts in their service area. For those districts where the relationship was not as strong, Hunger Free Oklahoma was able to use their existing connections with school districts to make introductions and build bridges between those working at the district and the ITOs.
- **Educate school district staff on Summer EBT, including where the data are being sent and what it will be used for.** Hunger Free Oklahoma noted that many school districts expressed concern about the legality of sharing student data, especially as there is no federal guidance around school districts and Tribes and sharing this sensitive information. Hunger Free Oklahoma was able to inform school districts about Summer EBT and how it functions in ITOs and helped facilitate conversations around data-sharing concerns. Many schools in the service areas ended up signing a memorandum of understanding (MOU) that allowed

them to share student data with the ITO. For those that did not, Hunger Free Oklahoma used data on the number of children who could benefit in each school district that did not participate to show how many children could be impacted by their decisions.

- **Amplify outreach that encourages children to apply for Summer EBT benefits, particularly in areas where schools decline to share data.** When families are unaware of Summer EBT, many miss out on important benefits that can keep them fed during the summer months. Hunger Free Oklahoma and the ITOs operating the program created school toolkits to help school districts spread the word about what the program was and how it worked. For the schools that chose not to sign MOUs and did not share their students' data, Hunger Free Oklahoma did a push in those areas to get families to fill out an application so they would not miss out on benefits. This included geotargeted advertising and broad regional outreach campaigns designed to reach families directly.
- **Elevate processes that make data sharing more seamless between school districts and the ITOs processing the data.** Hunger Free Oklahoma partnered with the Chickasaw Nation to host a webinar, which walked through best practices on data submission. They also created a template for schools to use to submit their student data in the correct format for processing. Hunger Free Oklahoma also noted that data were a challenge for some school districts that do not have staff capacity or the expertise to compile and clean student data. In these instances, Hunger Free Oklahoma was able to provide targeted technical assistance.

Hunger Free Oklahoma as a Data Contractor

Hunger Free Oklahoma has taken on the role of data contractor for many of the ITOs that are operating the program, resulting in a larger role in the collection and processing of data. In these cases, once a school has signed a MOU agreement to transfer their student data, it is received by Hunger Free Oklahoma, where they process and refine the data. This work includes formatting data to vendor specifications, following up with schools to address missing fields, and removing duplicate student records prior to submission to the EBT vendor.

Hunger Free Oklahoma also received data from each administering ITO on children receiving Tribal Temporary Assistance for Needy Families (TANF) or participating in Food Distribution Program on Indian Reservations (FDPIR). Children on the Supplemental Nutrition Assistance Program (SNAP) are also eligible for automatic benefits, but that data are held by the state agency. In two instances, ITOs were able to negotiate data-sharing agreements, but data sharing between ITOs and state agencies has a long, fraught history, raising longstanding concerns related to Native data

sovereignty and complicating ITO access to state-held SNAP data.¹ As a result, barriers to accessing this data stream often leave ITOs more heavily reliant on school data.

Conclusion

Hunger Free Oklahoma's experience offers a replicable model for supporting ITO participation in Summer EBT. The organization focused on scalable strategies: acting as a trusted intermediary between Tribes and school districts, standardizing data-sharing processes, and providing targeted technical assistance to reduce administrative burden. These approaches addressed common implementation challenges that are shared amongst ITOs. As Summer EBT continues to expand nationwide, replicating these data partnership strategies can help unlock Tribal participation and ensure more eligible children receive nutrition benefits during the summer months.

¹ *Native data sovereignty: A summary*. Native Land Information System. <https://nativeland.info/about/data-sovereignty/>