

RESEARCH BRIEF

Supporting Indian Tribal Organizations to Expand Summer EBT Access



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Introduction

The Summer Electronic Benefit Transfer (Summer EBT) Program is a permanent, federally funded program that helps school-aged children from families with low incomes access the nutrition they need during the summer months. Both Indian Tribal Organizations (ITOs) and states have successfully operated this program for the past two years, 2024 and 2025, but not every entity eligible to administer the program has opted in. By not opting in to Summer EBT, ITOs and states are missing out on the opportunity to utilize federal dollars to help address summertime food insecurity.

Tribal nations are sovereign governments. In the last several decades, federal policy has shifted to better recognition and engagement with Tribal sovereignty and autonomy.¹ This is illustrated through the expansion of pathways for self-determination and self-governance under both the Indian Self-Determination and Education Assistance Act of 1975² and more recent self-determination pilots, which were part of the 2018 Farm Bill.¹³ Tribal administration and operation of federal nutrition programs such as Summer EBT is an example of this evolution. While many state agencies operate Summer EBT, the specific advantages to ITO-operated programs need to be understood.

Several Indian Tribal Organizations currently administer Summer EBT. In Oklahoma, a state that has chosen not to operate the program, ITOs have been able to provide benefits to not only their own citizens, but also for the broader community. However, many ITOs continue to face administrative barriers that keep them from participating. As of 2022, the rate of food insecurity for American Indian and Native American households was more than double the national average, at 28 percent.⁴ Summer EBT is a step toward reducing hunger in Tribal communities.

About This Brief

This brief was created to:

- better understand the barriers that prevent Tribal Nations from participating in Summer EBT,
- define the benefits of Tribal administration of Summer EBT, and
- identify types of support that can be offered to ITOs to help them overcome barriers to participating.

¹ The pilots authorized were in the Food Distribution Program on Indian Reservations (FDPIR), as well as in the coordination and management of forested lands in Indian Country.

ITOs that administer the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) can operate Summer EBT. To administer a survey, Food Research & Action Center (FRAC) reached out to the 33 ITOs that are eligible but have not yet opted into the program. FRAC received eight responses to this survey from seven different states to inform this brief. FRAC also partnered with the Indigenous Food and Agriculture Initiative (IFAI) to gain deeper insight into the experiences and background of ITOs that operate WIC.

Background

The Summer EBT Program was established as a permanent program in December 2022 and provides each eligible child in a participating ITO or state with approximately \$120 per summer to help purchase food during the summer months. To be **eligible**, children must be **school-age**,ⁱⁱ and eligible for free or reduced-price school meals or enrolled in a program such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or in most states, Medicaid.

Summer can be the hungriest time of year for families with school-age children. When the school year ends, millions of children from households with low incomes lose access to the school meals they rely on. The Summer Meals Programs were designed to replace school meals lost during summer vacation. Unfortunately, summer meals reach only a fraction of the children who rely on free and reduced-price school meals during the school year. Summer EBT bridges that gap.

History of Summer EBT

Summer EBT was initially funded through the Agriculture Appropriations Act of Fiscal Year 2010 (Public Law 111-80), which gave the U.S. Department of Agriculture (USDA) the authority to test innovative methods to reduce food insecurity during the summer. The program was launched as a demonstration project in 2011 that served 12,500 families across five states in its first year. The demonstration project was found to be successful in decreasing food insecurity and increasing nutrition. Due to this success, Congress invested more funding to expand the program to serve over 300,000 families in two ITOs (Cherokee Nation and Chickasaw Nation),⁵ and 10 states (Delaware, Connecticut, Michigan, Missouri, Nevada, Oregon, Tennessee, Texas, Virginia, and Washington).

Starting in spring 2020, the COVID-19 pandemic completely changed how children accessed the child nutrition programs. The Pandemic Electronic Benefit Transfer (Pandemic EBT) program, which was based on the Summer EBT model, was created to fill the gap when schools were forced to close and children lost access to school meals. In summer 2021, the Pandemic EBT program expanded to cover summer break for eligible children; however, only state agencies and U.S. territories were able to operate the program. Three ITOs were funded to simultaneously operate the Summer EBT demonstration projects: Cherokee Nation, Chickasaw Nation, and the Intertribal Council of Arizona.⁶ These ITOs operated the program from 2021 through summer 2023.

In December 2022, Congress passed the Consolidated Appropriations Act of 2023, which authorized a nationwide, permanent Summer EBT Program to begin in summer 2024.⁷ State agencies, eligible ITOs,ⁱⁱⁱ and U.S. territories can all opt in to operate the Summer EBT Program each year.⁸

ⁱⁱ School-age for Summer EBT means the age at which a state is required to provide a free education. This age range is set by each state individually and therefore varies across the country.

ⁱⁱⁱ Eligible Indian Tribal Organizations are those that administer the Special Supplemental Nutrition Program for Women, Infants, and Children.

Challenges ITOs Face When Operating the Federal Nutrition Programs

There are unique challenges faced by ITOs when administering the federal nutrition programs. The administrative burden is often cited as the biggest barrier. Tribal Nations do not have the same access to funding streams as states. Tribes rely largely on federal programs and Tribal business enterprises to fund and support community services.⁹ The Summer EBT statute limits what types of funding can be utilized for the 50 percent administrative match, including prohibiting other federal grant dollars from being used to meet the match. This is particularly limiting in ITOs, where federal grants can make up a majority of their overall budget. While WIC does not have a funding match for administering agencies, other administrative burdens, including finding staff with nutrition program expertise can be challenging in the ITO government structure.

Summer EBT, as designed, does not account for the governance structures, timelines, and administrative realities of Tribal governments. ITOs may operate on different legislative cycles, fiscal years, and approval processes, which can affect implementation timelines and decision-making. Many ITOs are also administering federal nutrition programs in areas that overlap with food deserts, where identifying WIC-approved grocery stores on Tribal lands is more challenging than at the state level. These structural differences often require increased coordination with others, including state agencies and other Tribal governments, yet federal nutrition programs are not designed with these circumstances in mind — further complicating administration.

Culturally Relevant Foods in the WIC Program

WIC programs utilize EBT cards that allow families to redeem benefits at WIC-authorized grocery stores for specific quantities of pre-determined food. These foods are called a “food package.” What is included in a WIC food package is determined by the age of the child the benefits are being utilized for and standards for food packages set by USDA. However, WIC-administering agencies have flexibility to decide which specific brands and types of food can be purchased within each USDA-defined food category. This allows for administering agencies to respond to religious and cultural preferences of the populations they serve.

As ITOs have their own beliefs, traditions, and cultures, food packages can vary between each Tribe. In recent years, USDA has updated their minimum requirements for food packages to include foods such as quinoa, blue cornmeal, canned fish, nondairy alternatives to milk and cheese, and expanded options for fruits and vegetables.¹⁰ These changes were in part due to calls on behalf of ITOs and other specific populations for more culturally responsive foods.

Benefits of Operating Summer EBT

Currently, 21 of the 33 ITOs administering WIC are within states that operate Summer EBT. According to the Summer EBT [statute](#), when both a state agency and an ITO choose to operate Summer EBT, eligible individuals within Tribal areas default to receiving benefits from the ITO rather than the state agency.¹¹ These individuals may request to switch and receive their benefits from the state instead. In states not operating Summer EBT, the benefit of an ITO operating the program is straightforward, but even in states that already operate Summer EBT, receiving benefits through the Tribe offers additional advantages for Tribal citizens.

Increasing Participation

Three responding ITOs noted that operating Summer EBT can offer significant advantages for both Tribal communities and those served by ITO programs by increasing participation and widening the reach of the program. However, getting a family to participate for a single summer is not necessarily the end goal. To provide a foundation for higher

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food security over the summer months, it is important that eligible families continue to participate year after year. In contrast with the state agency, two respondents noted that ITOs are well-positioned to build more comprehensive and culturally grounded services, which not only better reflect community needs, but also foster deeper trust and stronger relationships with families. This trust helps to sustain that long-term engagement and encourages consistent participation.

Program Design and Responsiveness

Two ITOs noted that Tribal administration of programs offers greater flexibility to design outreach and service delivery approaches that are responsive to local conditions and community needs. This flexibility allows Tribes to modify certain program operations, such as card distribution, customer service options, and communication strategies, to more effectively reach families in rural and hard-to-access areas where state models may not be as responsive. By leveraging trusted community networks, culturally relevant engagement strategies, and innovative delivery methods, Tribal administration can reduce access barriers and ensure that more children receive the nutrition support they need during the summer months.

Supporting Tribal, Local, and Rural Economies

WIC is a federal nutrition program that allows participants to redeem their benefits at authorized retailers, such as local grocery stores. Summer EBT benefit dollars function similarly. A portion of these benefit dollars are infused directly into the community, stimulating the local economy. These dollars can support retail jobs and strengthen related industries, including agriculture, food processing, and food distribution.¹² When ITOs opt to participate in Summer EBT, the infusion of federal benefit dollars spent within their jurisdictions can also produce positive economic impacts. Besides helping ensure continued and reliable food access for families during the summer months, this spending also helps sustain local retailers, particularly in rural and Tribal communities where grocery options may be limited. This can also ensure that there is continued access to food retailers that can benefit the broader community.

Barriers to Operating Summer EBT

Summer EBT, and most federal nutrition programs including WIC, were designed originally for state agency implementation. Because ITOs have their own distinct governance procedures, and sometimes with smaller administrative teams and more limited funding sources, their ability to implement Summer EBT differs significantly from state agencies. Through the survey, FRAC found the three top barriers identified by respondents were administrative costs, staffing capacity, and data access. While Summer EBT uptake is possible — as seen by the participation of five tribes in 2025 — broader implementation by more ITOs could be possible if the following barriers were addressed.

Administrative and Start-Up Costs

As noted by six of the survey-responding ITOs, the 50 percent administrative match set forth by Summer EBT statute is a deterrent, as are the start-up costs. To begin drawing down funding, government entities looking to operate the program must submit an Interim Plan of Operation and Management.¹³ These plans must include estimated program participation, anticipated administrative funding needs, an initial expenditure plan, as well as answers to a set of questions required by USDA.¹⁴ Staff members must complete this administrative requirement before funding from USDA is available. This initial staff time that is not shared in cost by USDA is not something that all ITOs can cover.

Two ITOs shared that while the 50 percent administrative match for state agencies is typically only a small portion of their overall budget, for ITOs, a 50 percent match represents a significant investment. Many ITOs are using their existing income streams to support implementation of WIC, provide participant services, and support Tribal operations. Many of these income streams are federal grants, which also cannot be used for Summer EBT administrative matches.

Staffing Capacity

ITOs often face significant staffing challenges in implementing Summer EBT, which was reported by six survey respondents. Beyond lacking the funding for additional staff, two respondents stated that existing staff operating programs such as WIC and FDPIR are stretched thin. Most ITOs that responded to the survey only have a limited staff, meaning that a small number of individuals run all of the federal nutrition programs. Summer EBT implementation requires that all operating governmental entities create detailed plans and procedures on operations such as data collection, verification, de-duplication, and benefit dissemination. To do this, many state agencies have hired new staff or designated existing staff members to operate this program. As noted by multiple respondents, this may not be an option for some ITOs, as funding is limited and often restrictive, and most ITOs already operate with minimal staffing, making it difficult to take on additional responsibilities.

Data Access

All children eligible for free or reduced-price school meals, or who qualify for SNAP, TANF, FDPIR, and in most states Medicaid, can receive Summer EBT benefits automatically without the need for an application. Much of the required data outside of free and reduced-price meal data (SNAP, TANF, and Medicaid) are housed in one state agency. ITOs will need to work with state agencies to request the necessary data for automatic issuance. Four respondents mentioned that data sharing by state agencies to Tribal governments tends to have a long, fraught history, and brings up issues around data sovereignty.¹⁵ Because of this, ITOs may not receive the timely, accurate data they need from the state to identify eligible children, which becomes a significant barrier to operating Summer EBT.

Localized Supports That Would Allow for Greater Summer EBT Participation

The current setup of Summer EBT is state-centric and overlooks the specific circumstances Tribal administrations operate under. Changes must be made to the administrative funding structure, reporting requirements, and technical assistance provided, among others, to allow for wider ITO program adoption. For more on federal recommendations, see FRAC's advocacy resource [Improving Summer EBT for Indian Tribal Organizations](#). However, there are ways that state agencies, local governments, and nonprofit organizations can help reduce barriers that ITOs face.

Administrative Cost Solutions

Outside of changing the statute, there are innovative ways that ITOs can come up with the 50 percent funding match. USDA disallows several potential sources of administrative match funds; however, private and philanthropic funding can still be used. One state that utilizes philanthropic dollars to help fund the program is North Carolina, where companies such as Blue Cross Blue Shield and nonprofits have provided money that has fulfilled the 50 percent administrative match for the state. While philanthropic support can be difficult to come by, the Summer EBT Program is a widely supported program by many industries. ITOs can engage funders who are interested in supporting Summer EBT and see if there is an opportunity to receive funds to cover administrative costs.

Data Support

Summer EBT data collection is complex and challenging. Not only is data required from the state agency, but schools also play a role in identifying the free and reduced-price eligible students. Technical assistance from USDA is one key piece that would support ITOs being able to navigate these complex systems. However, survey respondents elevated that state agencies should also be able to help ITOs navigate data requirements, particularly in states that are already operating the program. State agencies should also be able to support schools on Tribal lands in collecting and refining their data, making it easier to identify eligible students and issue benefits.

Two respondents also noted that nonprofits also can provide support by facilitating data collection and creating communication resources driven by the ITO entities involved. A nonprofit could aid in data collection by encouraging families to apply, but also by supporting relationships between local school districts that are not Tribally affiliated, but have student populations covered by the ITO.

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Strategies for Effective Data Partnerships

Hunger Free Oklahoma collects and analyzes data that supports ITO implementation of Summer EBT as part of a coalition of ITOs [operating Summer EBT](#) in the state. In an interview with the organization's data team, Hunger Free Oklahoma outlined several replicable strategies to help support Summer EBT implementation in ITOs:

- Leverage existing connections with school districts where ITOs have less day-to-day interaction to help create lines of communication and build trust.
- Educate non-Tribal school district staff on Summer EBT, including where the data is going and what it will be used for.
- Amplify outreach that encourages children to apply for Summer EBT benefits, particularly in areas where the schools refuse to share data.
- Elevate processes that make data sharing more seamless between school districts and the ITOs processing the data.

For more information, see FRAC's [resource on data partnership strategies for ITOs' Summer EBT implementation](#).

State Agency Cooperation

One of the biggest supports state agencies can provide that was raised by three respondents was supplying timely and accurate student eligibility data, including information related to SNAP, TANF, Medicaid, and free or reduced-price school meal status. Access to this data is essential for ITOs, as it enables them to identify eligible children and issue benefits without requiring families to apply, yet many ITOs face delays or gaps in obtaining this information due to longstanding challenges in state-Tribal data sharing.

Beyond data sharing, one Tribe suggested that state agencies can improve coordination by clearly communicating their own plans regarding whether they intend to operate Summer EBT each year. Early and transparent notice allows ITOs to make informed decisions about opting in and plan for administrative needs. This type of collaboration can significantly reduce operational barriers for ITOs and support a smoother path to Summer EBT participation.

Conclusion

Summer EBT offers a vital opportunity to reduce childhood food insecurity. There are clear benefits to Tribal-run programs, but barriers like administrative costs and staffing constraints to long-standing challenges in accessing state-held data can affect their ability to operate the program effectively. Despite these challenges, nonparticipating ITOs are clear that, with targeted support and meaningful changes that account for the unique nature of ITO program administration, they would participate in Summer EBT and expand its reach within their jurisdictions.

Additionally, state agencies, nonprofits, and federal partners each have an important role to play in both reducing existing barriers and supporting Tribal implementation under the current regulations. With these improvements, Summer EBT can better honor Tribal sovereignty, allowing more ITOs to administer the program in ways that reflect local needs and cultural priorities, and more children can have access to the nutrition they need during the summer months.

Endnotes

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