

# FY 2024 Summer EBT Administrative Funding

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## Agenda

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- Introduction to Summer EBT Program
- Requirements for Administrative Funding Requests
- Completing the FNS-366A, Expenditure Plan
- FY24 Summer EBT Administrative Funding
- FY25 Summer EBT Implementation Costs
- Method of Payment and Reporting
- Administrative Costs and Cost Allocation
- Questions



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## Introduction to Summer EBT Program

- **Consolidated Appropriations Act, 2023 (P.L 117-328).**
  - Authorized a permanent, nationwide Summer Electronic Benefit Transfer (Summer EBT) Program beginning in 2024.
- **Summer EBT is a Federally-assisted program.**
  - Provides EBT benefits to children who lose access to free and reduced-price meals during the summer when school is not in session.
  - States provide benefits on EBT cards which can be used to purchase food from approved retailers.



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## Introduction to Summer EBT Program

- FNS is authorized to pay each Summer EBT agency an amount equal to **50 percent** of the administrative expenses incurred in operating the program up to their approved FNS-366A level.
  - This means that Summer EBT agencies may only draw 50 percent of incurred expenses from their LOC.
- Each Summer EBT agency in direct receipt of a Summer EBT administrative grant will be responsible for providing the required 50 percent match.



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## Administrative Funding Requests



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## Administrative Funding Requests - POMS

- All State agencies and ITOs operating the Summer EBT Program will be required to submit a management and administration plan, referred to as a ***Plan for Operations and Management (POM)***.
  - Interim POM is due as soon as is practicable for FY 2024, and annually thereafter by August 15
  - Final POM is due by February 15
- An approved POM will establish the Summer EBT agency's available administrative funding level for the fiscal year.

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## Interim POM

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- Approval of an Interim POM allows Summer EBT agencies to access Federal administrative funds in advance of completing the full planning process.
  
- An Interim POM must include the Summer EBT agency's best estimates on:
  - forecasted program participation,
  - anticipated administrative funding needs as expressed on the FNS-366A, Expenditure Plan, and
  - other programmatic information required in the final POM to the extent that such information has been determined at the time of submission.

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## Final POM

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- A Final POM must include:
  - the comprehensive needs of the State or ITO's Summer EBT Program, to include coordinating and partnering Summer EBT agency costs and any local agency costs, as applicable;
  - the Summer EBT agencies' plan to comply with any standards prescribed by the Secretary for the use of these funds; and
  - how program funds will be used to the maximum extent practicable to reach eligible children.
  - The total amount of administrative funding being requested on one or more FNS-366(a), Expenditure Plan, submission(s) and should denote amounts per Summer EBT agency.

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## Final Approved POMs

- A final approved POM will establish the Summer EBT agency's available administrative funding level for the fiscal year.
- Summer EBT agencies will have the opportunity to revise their FNS-366A throughout the operational year and increases for well-documented costs will be considered, subject to available funds. All administrative funds for Summer EBT are subject to a **50 percent** matching requirement.
- **NOTE:** While administrative funds may be received prior to approval of a final POM, a Summer EBT agency **may not draw down federal food benefit funds** until the final POM is approved.

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## Completing the FNS-366A



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## Administrative Funding Requests – FNS-366A

- Both interim and final POMs must be accompanied by an FNS-366A, Expenditure Plan, reflecting planned administrative cost needs for the year.
- FNS-366A(s) submitted with the interim or final POM constitutes each Summer EBT agency's request for funds for planned administrative expenditures.
- An approved POM will establish the Summer EBT agency's available administrative funding level for the fiscal year.
- Summer EBT agencies will have the opportunity to revise their FNS-366A throughout the operational year and increases for well-documented costs will be considered, subject to available funds. All administrative funds for Summer EBT are subject to a **50 percent** matching requirement.

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## Completing the FNS-366A for Summer EBT

- FNS has developed instructions on how to complete FNS-366A, Expenditure Plan.
- These instructions are included in the Summer EBT Admin Memo under Attachment A.
- The instructions help identify what categories need to be filled and how Summer EBT agencies can estimate their administrative costs.



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## FNS-366A, Expenditure Plan

FUNCTION		FEDERAL FISCAL QUARTER ENDING				PROJECTION TOTALS
		DECEMBER	MARCH	JUNE	SEPTEMBER	
01	CERTIFICATION					0
02	COUPON ISSUANCE					0
03	QUALITY CONTROL					0
04	MANAGEMENT EVALUATION					0
05	50% FUNDING FRAUD CONTROL					0
06	75% FUNDING FRAUD CONTROL					0
07	ADP OPERATIONS					0
08	FAIR HEARINGS					0
09	OTHER ACTIVITIES (20+ 30)					0
10	TOTAL (1-9)	0	0	0	0	0

5. REMARKS

6. SIGNATURE OF AUTHORIZED OFFICIAL

7. NAME AND TITLE

8. DATE

FORM FNS-366A (7-03) Previous Edition Obsolete  
Electronic Form Version designed in JetForm 5.1 version

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## FY 2024 Summer EBT Administrative Funding



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## Initial FY 2024 Administrative Funding

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- FNS will release an initial allocation of Summer EBT administrative funds upon receipt of:
  - (1) a **notice of intent** to administer the program in 2024 and
  - (2) an **affirmative statement** indicating that funding has been identified and is available to the Summer EBT agency to meet the required 50 percent match.
- The FNS-366A is **not** needed to draw funds against the initial allocation.
- Summer EBT agencies may only draw **50 percent** funding for expenses that have already been incurred

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## Initial FY 2024 Administrative Funding: Document Needs

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### Notice of Intent

- The notice of intent must be provided **no later than January 1, 2024**.

### Affirmative Statement

- The affirmative statement must clearly attest that funds are available for the match for each State agency which will receive administrative funds.

**NOTE:** Initial FY 2024 administrative funds will **not** be released until **both** have been provided.

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## Notice of Intent Template

Notice of Intent to Administer the Summer EBT Program in FY2024

[Blank for agency name] and [blank for agency name, if applicable] hereby notify USDA FNS of intent to administer the Summer EBT Program in [State or ITO] in Fiscal Year 2024. The coordinating Summer EBT agency will be [Name]. The partnering Summer EBT agency will be [Name].

We understand that submission of this notice of intent may allow [State or ITO] to access an initial allotment of Summer EBT administrative funds. However, we acknowledge that full access to administrative funds will not be granted until FNS has approved our FY 2024 Summer EBT Interim Plan for Operation and Management (IPOM).

\_\_\_\_\_  
[coordinating agency authorized signatory]

\_\_\_\_\_  
[partnering agency authorized signatory]

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## Affirmative Statement Template

[Blank for agency name] and [blank for agency, if applicable] hereby attest that non-federal funding has been identified and is available to meet the 50 percent match for Summer EBT administrative funds.

[coordinating agency signatory]

[partnering agency signature]

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## Initial FY 2024 Administrative Funding Allocations

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- Amount of initial allocation will be based on expenditure and unliquidated obligation data reported to FNS on the SNAP PEBT Administration Grant or the CN PEBT Administration Grant reports, as appropriate in FYs 2021 and 2022.
  - If no such data available, then initial amount made available will be \$100,000.
- Initial FY 2024 funds will be provided in amount equaling up to 16.25 percent of the average total expenditures for both grant years; or \$100,000, whichever is greater.
- This amount will be calculated by FNS and will be provided to each Summer EBT agency by their respective FNS Regional Offices once the Notice of Intent and Affirmative Statement is provided.

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## Initial FY 2024 Administrative Funding Allocations

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- Regional offices will inform each State agency and ITO of the initial funding amount available to them once letters of intent and affirmative statements are received.
- Initial funding will be made available through FNS-529 grant awards, which will be modified once full budget proposals are approved. (Assistance Listing Number: **10.646 Summer Electronic Benefit Transfer Program for Children**)
- **Note:** Any Summer EBT agency that receives FY 2024 administrative funding as a direct grant **must** sign an FNS-529, Grant Award Agreement, with their respective FNS regional office.

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## Additional FY 2024 Funding

- As mentioned in prior slides, States will receive additional funding upon approval of FNS-366A and POM.



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## FY 2024 Period of Performance

- Period of Performance for FY 2024 Summer EBT administrative funding grants will be October 1, 2023, to September 30, 2024.
- Accordingly, any incurred expenses within this time period may be applied to the FY 2024 grant.



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## Can FY 2024 Administrative Funding be used for FY 2025 Implementation Costs?

- States and ITOs intending to begin operating Summer EBT in FY 2025 may receive administrative funding in FY 2024 to cover planning and implementation costs related to FY 2025 Summer EBT operations.
- A new FY 2025 interim POM and FNS-366A will need to be submitted by August 15, 2024, to receive administrative funding for FY 2025, and an FY 2025 final POM will need to be approved in order to receive benefit funds for FY 2025.



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## Additional Requirements for SEBT Administrative Funding



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## Considerations for Local Agency Administrative Costs

- Expenses incurred by local education agencies (LEA) and other local agencies carrying out Summer EBT operational activities under formal agreements with Summer EBT agencies are allowable costs under Summer EBT administrative funding grants.
- Summer EBT agencies are only required to reimburse for expenses directly related to the activities and processes required to implement the Summer EBT program.
- In no cases may non-profit school food service account funding be used to meet the Summer EBT match.
- In 2024 only, Summer EBT agencies may delegate application processing to LEAs.

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## Allowable Administrative Costs

- Allowable administrative costs for Summer EBT administrative funds are to operate the Summer EBT at the State, ITO, and local levels.
- Examples of allowable Summer EBT administrative expenses may include, but are not limited to:
  - Salaries and benefits of personnel involved in Summer EBT and administrative support;
  - Office equipment, supplies, postage, and copying/printing costs;
  - Indirect costs;
  - Outreach associated with enrollment or the delivery of Summer EBT and
  - EBT-related or other system costs.



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## Cost Allocation Requirements

- Summer EBT is distinct from other FNS programs, therefore, Summer EBT agencies may not use Federal funds intended for other programs (e.g., SNAP, WIC, National School Lunch Program/School Breakfast Program, etc.) for Summer EBT expenses.
- If a Summer EBT agency conducts activities that will benefit the administration of more than one Federal program, the agency must appropriately allocate administrative costs to each affected program.
- **As a reminder**, Child Nutrition State administrative expense funds may not be used to support Summer EBT costs in FY 2024 and beyond.

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## Method of Payment

- Administrative funds will be provided through a **letter of credit (LOC)**.
- The LOC allows Summer EBT agencies to draw authorized funds from the United States Treasury.
- The draw of 50 percent funding from the LOC will occur once allowable costs have been incurred



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# Reporting Requirements

- EBT administrative funds reporting consists of two primary reports:
  - Summer EBT agencies will estimate their administrative cost needs on the FNS-366A, Expenditure Plan, submitted annually or as revised
  - Summer EBT agencies will report their incurred administrative expenses on an **FNS-778, Financial Status Report**, on a quarterly basis.
- FNS-778 will collect only Summer EBT administrative expenses and will be separate from the FNS-778 submitted in connection with the SNAP program.
- Both forms are accessed and submitted using FNS' Food Programs System (FPRS).

REPORTING



## FNS-778, Financial Status Report

<b>FINANCIAL STATUS REPORT</b>		1. FEDERAL AGENCY & ORGANIZATIONAL ELEMENT TO WHICH REPORT IS SUBMITTED <b>FOOD AND NUTRITION SERVICE, USDA</b>		FEDERAL GRANT OR OTHER NUMBER <b>Letter of Credit No. 12-35-</b>		23. FISCAL YEAR	
3. STATE AGENCY (Name and complete address, including ZIP code. Also enter assigned State code.)		4. AGENCY DUNS NUMBER		5. STATE AGENCY ACCOUNT OR ID NO.		6. FINAL REPORT YES <input type="checkbox"/> NO <input type="checkbox"/>	
		8. PROJECT/GRANT PERIOD		7. BASIS CASH <input type="checkbox"/> ACCRUAL <input type="checkbox"/>		3. PERIOD COVERED BY THIS REPORT	
<b>10. STATUS OF FUNDS</b>							
<b>SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM</b>							
SNAP FUNCTIONS/ACTIVITIES	1. CERTIFICATION	2. EBT RISK/ANCE	3. QUAL. CNTL.	4. MIT.FUNL.	5. FRAUD CNTL.	6. ADP DEV.	7. ADP OPER.
8. FAIR HEARINGS	9. OTHER ACTIVITIES - SUB TOT. SHRS	10. GRAND TOTAL					
a. Net outlays previously reported							
b. Total outlays this report period							
c. Less: Program income credits							
d. Net outlays this report period (Line b minus line c)							
e. Net outlays to date (Line a plus line d)							
f. Less: Non-Federal share of outlays							
g. Total Federal share of outlays (Line e minus line f)							
h. Total unliquidated obligations							
i. Less: Non-Federal share of unliquidated obligations shown on line h							
j. Federal share of unliquidated obligations							
k. Total Federal share of outlays and unliquidated obligations							
l. Total cumulative amount of Federal funds authorized							
m. Unobligated balance of Federal funds							
11. INDIRECT EXPENSE	12. TYPE OF RATE PROVISIONAL <input type="checkbox"/> PREDETERMINED <input type="checkbox"/> FINAL <input type="checkbox"/> FIXED <input type="checkbox"/>	13. CERTIFICATION		SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		DATE REPORT SUBMITTED	
d. RATE	e. BASIS	f. TOTAL AMOUNT		g. FEDERAL SHARE		I certify to the best of my knowledge and belief that this report is correct and complete and that all outlays and unliquidated obligations are for the purposes set forth in the award documents.	
STAMP/CERTIFY DATE	LAST UPDATED BY	LAST UPDATED ON		NAME	TITLE	TELEPHONE NO.	AREA CODE NUMBER
No further monies or other benefits may be paid out under this program unless this report is completed and filed as required by existing legislation (42 C.F.R. 205). FPRS Electronic Version							
FNS-778 (10-05) Page 1 of 4 FNS-778/788A SNAP Worksheet for the SF-425							





SCAN ME

### Summer EBT Summer EBT Implementation Toolkit

PROGRAMS > SUMMER EBT > STATE AGENCY/TRIBAL ORGANIZATION/TERRITORY > SUMMER EBT IMPLEMENTATION TOOLKIT

#### State Agency/Tribal Organization/Territory

##### Summer EBT Implementation Toolkit

Summer EBT Reporting Submission Requirements

Summer EBT Notice of Intent Template

Summer EBT 2024 Interim Plan for Operations & Management Template



As a nation, we have the opportunity to dramatically reduce childhood hunger during the summer months, which are the hungriest time of year for students who miss the meals offered during the school year. Summer EBT helps address summer hunger among children beginning in the summer of 2024.

The following documents serve as a resource to assist states, tribal organizations, and territories in preparing to implement Summer EBT in 2024.

##### [Summer EBT Reporting Submission Requirements](#)

This table provides an introductory timeline of submission requirements to operate Summer EBT in 2024.

##### [Summer EBT Notice of Intent](#)

Each state, territory, and tribal organization that intends to operate the Summer EBT Program must notify the Secretary by Jan. 1 of each year of its intent to do so.

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