

Date: December 5, 2025

Memo code: SEBT 01-2026

Subject: Promoting Integrity in the Summer EBT Program

To: Regional Directors, Child Nutrition Programs, All Regions

All Summer EBT Agencies

Purpose

This memorandum provides Summer Electronic Benefit Transfer (EBT) agencies information on program oversight and expectations for the 2026 plans for operations and management (POM) and program implementation. An attachment to this memorandum provides strategies for more robust integrity measures. In line with U.S. Department of Agriculture Secretary Brooke Rollins' priorities, this guidance clarifies statutory, regulatory, and administrative requirements, and supports implementation approaches that will minimize fraud, waste, and abuse while protecting participants and taxpayers.

Background

Summer EBT agencies are responsible for establishing internal processes, procedures, and controls that ensure their Summer EBT program operates effectively and with integrity. Agencies are required to explain their approach to program integrity in their annual POM submission. The purpose of this requirement is to support Summer EBT agencies in developing plans that approach integrity from a holistic perspective while also addressing specific areas of concern. The POM process also provides an opportunity for collaboration between the USDA Food and Nutrition Service (FNS) and Summer EBT agencies, allowing FNS to provide technical assistance and to identify best practices and challenges. Leveraging effective strategies from the Supplemental Nutrition Assistance Program (SNAP) or Women Infant and Children (WIC) programs is encouraged. However, Summer EBT agencies are

responsible for making appropriate modifications to suit Summer EBT and must ensure that any strategies adapted from another program support the agency's overall Summer EBT integrity framework.

As we enter the third year of program implementation in 2026, FNS is focusing on program integrity. FNS expects Summer EBT agencies have developed and are continuing to refine their integrity plans and procedures, which shall be detailed in their POM submission. FNS has identified areas where each Summer EBT agency needs to improve over their 2025 implementation and will use this information when reviewing 2026 POMs to ensure that agencies are improving program efficiency and accuracy.

To date, FNS has worked closely with Summer EBT agencies on an ongoing basis through technical assistance and the POM review process to identify and correct issues in real time. Going forward, FNS is developing standard monitoring procedures for Summer EBT that align with other FNS programs. These reviews will assess program performance in the prior year to identify issues and develop a corrective action plan to address any respective challenges. For summer 2025 implementation, FNS will review Summer EBT agency performance through a special review process which will assess every agency's operation of Summer EBT during 2025. Summer EBT agencies will be required to correct any issues prior to 2026 operations.

Summer EBT agencies are responsible for, and will be held accountable for, program errors, in accordance with 7 CFR 292.27. This may include reimbursing FNS for funds that were spent in error, such as benefits issued to ineligible children or duplicate issuances.

Integrity Questions in the 2026 POM Template

Summer EBT agencies are asked to respond to the following questions in their POM, providing an opportunity to explain the overall approach to integrity and elaborate on key integrity issues. The POM is an opportunity to think carefully and critically about how each

element of an agency's integrity framework supports and complements other elements, and how program integrity can be improved.

Summer EBT agencies should obtain FNS concurrence before implementing any significant program changes, for example, adding new foods to the food package. Many Summer EBT agencies will begin implementation activities for the 2026 program year before their 2026 POM is submitted and approved, which is encouraged for routine work. FNS is not obligated to approve activities that are already underway before POM approval, and Summer EBT agencies could be required to change or restart aspects of their Program, which may increase error risk. FNS encourages Summer EBT agencies to submit POMs as early as possible.

- Describe your plans and procedures to ensure program integrity, including but not limited to: internal controls, data collection practices, data quality, developing and maintaining an accurate master issuance file, and participant training and communication. [[7 CFR 292.16\(a\)](#); [7 CFR 292.16\(a\)\(5\)](#)]
- What are your procedures to detect and prevent dual participation within the State (i.e., a child simultaneously receiving multiple allotments from your Summer EBT Program)? [[7 CFR 292.8\(e\)\(9\)](#); [7 CFR 292.15\(d\)\(2\)](#)]
- What are your procedures to detect and prevent dual participation with other States/Indian Tribal Organizations (ITO) (i.e., a child simultaneously receiving benefits from your State and another State or ITO)? This process must include providing notice to households that they may not use benefits from more than one State or ITO. [[7 CFR 292.8\(e\)\(9\)](#); [7 CFR 292.15\(d\)\(2\)](#)]
- Describe how you will identify and investigate suspected program violations. If you are using the same processes used to identify and investigate violations in SNAP/NAP, you may provide a copy or description of your SNAP/NAP plan. [[7 CFR 292.8\(e\)\(4\)](#); [7 CFR 292.16\(e\)\(1\)](#); [7 CFR 292.25](#)]

- Describe how you will establish and pursue claims against households for cases of erroneous payments. If you are using the same processes that you use to pursue claims in your SNAP/NAP program, you may provide a copy or description of your SNAP/NAP plan. [\[7 CFR 292.27\]](#)
- Summer EBT agencies have the discretion to determine when to pursue a claim based on cost effectiveness or the individual circumstances. What is your process or criteria for determining if a claim should be pursued? If you use a specific dollar value to determine cost effectiveness (e.g., a disregard threshold), provide the dollar value. If you are using the same processes that you use to determine if a claim will be pursued in your SNAP/NAP program, you may provide a copy or description of your SNAP/NAP plan. [\[7 CFR 292.27\(c\)\]](#)

Summer EBT agencies should direct questions about this memorandum to the appropriate FNS Regional Office.

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Integrity Strategies

Through collaboration with Summer EBT agencies, FNS has identified strategies to improve program integrity. These are offered as examples and are not an exhaustive list of possible integrity strategies. Summer EBT agencies should consider their unique needs and risks when developing integrity plans, processes, and controls. Consistent with Secretary Rollins' priority to support State innovation, FNS seeks to learn additional successful strategies from Summer EBT agencies and will share this information with other Summer EBT agencies so they may also benefit from those innovations.

- Perform a risk analysis to identify where errors might occur, such as in receiving correct data from schools, deduplicating data and compiling the master issuance file, and issuing the correct benefits to households. Develop integrity plans that target those areas of risk.
- At specific points, such as before compiling the master issuance file, or before sending the issuance file to the EBT processor, compare actual numbers to expected numbers. For example, upon receipt of school data, compare the data with the known total school enrollment number and the number of children the school has reported as eligible for free or reduced price meals. A discrepancy would warrant further investigation to ensure only eligible children would be issued benefits.
- Train individuals who are responsible for providing data on eligible children (e.g., school staff, social services agencies) on eligibility requirements so they understand what data is required and ultimately share accurate and appropriate data.
- Review [USDA's past research on integrity-focused design](#) before building an online Summer EBT application or contracting for services from a third-party vendor. This may help reduce household error and prevent improper payments.
- Review FNS' [Summer EBT Steps for Verification of Eligibility](#) resource for strategies and resources on effective verification.
- Provide an accessible and user-friendly online portal that will allow households to access and provide updates to critical program information. For example, a parent might use a

portal to check their eligibility status, update their contact information, or opt out of the Program. This will reduce unnecessary applications, ensure that eligible children will receive their benefits timely, and allow families that don't want the benefit to opt out of the Program before an EBT card is issued.

- In a household's approval notice, include the specific amount of benefits the household should receive. If an over-issuance occurs, this information may prevent a household from inadvertently spending benefits to which they're not entitled. Inform the household they should contact the agency if they are issued a different amount than what is specified in the notice.
- Establish written or formalized agreements (e.g., memoranda of understanding) with neighboring States and/or ITOs that allow Summer EBT agencies to share data for the purpose of preventing duplication.
- Leverage experience and infrastructure from SNAP or WIC programs. For example, adapt existing SNAP processes for investigating and responding to program violations. States and ITOs that already have strong integrity measures for similar systems and activities in another program should apply those measures to Summer EBT, when appropriate.