# USDA Food and Nutrition Service logo

Summer Electronic Benefit Transfer for Children (Summer EBT) Plan for Operations and Management (POM) Template

# Instructions

Each State and Indian Tribal Organization (ITO) that intends to administer the Summer EBT Program beginning in 2024 must submit to the Food and Nutrition Service (FNS) regional office a final POM not later than February 15, 2024.

In States with multiple Summer EBT agencies, the coordinating Summer EBT agency is the primary point of contact for the Summer EBT Program and is responsible for the complete and timely submission of the POM. However, the POM must be developed in cooperation with all State Summer EBT agencies and be reflective of the plans and administrative funding needs of both. For ITOs, the administering agency is responsible for its program’s POM. For the purposes of this document, the term ‘Summer EBT agency’ includes all administering agencies within a State or ITO unless otherwise specified.

The final POM must:

1. Address all the requirements in this template, and
2. Be approved by FNS before the Summer EBT agency may draw **federal food benefit funds** for the fiscal year.

*Amendments*

At any time after approval, the coordinating Summer EBT agency may request to amend a final POM to reflect proposed changes. The coordinating Summer EBT agency must submit any amendments to the FNS regional office for approval. The amendments must be signed by the Summer EBT agency-designated official(s) responsible for ensuring that the Program is operated in accordance with the POM.

**Required Attachments – *described in Sections 1 & 6***

|  |  |
| --- | --- |
|  | A copy of the inter-agency written agreement(s) between the Summer EBT coordinating agency and each partnering agency, if applicable [[7 CFR 292.3(c)](https://www.ecfr.gov/current/title-7/part-292/subpart-A#p-292.3(c)), [7 CFR 292.8(e)(1)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(1)), [7 CFR 292.8(e)(8)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(8))] |
|  | An FNS-366A expenditure plan for each agency within the State or ITO that will draw administrative funds from FNS [[7 CFR 292.8(e)(3)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(3))], i.e., part of the administrative budget |
|  | A budget narrative that corresponds with the 366A(s), which describes how costs within the budget categories were derived, and demonstrates links between expenditures and specific activities/tasks [[7 CFR 292.8(e)(3)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(3))], i.e., part of the administrative budget |
|  | A copy of the fair hearing procedures for participants [[7 CFR 292.8(e)(12)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(12)); [7 CFR 292.26](https://www.ecfr.gov/current/title-7/section-292.26)] |

# Section 1: Administrative Budget

1. Attach 366A expenditure plans(s) that reflect planned Fiscal Year 2024 administrative cost requirements for each agency within the State or ITO that will draw Summer EBT administrative funds from FNS [see [7 CFR 292.8(e)(3)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(3))]. See the policy memo [SEBT 01-2024, FM 01-2024 *Summer EBT Administrative Funding Process for FY2024,* October 18, 2023](https://www.fns.usda.gov/sebt/administrative-funding-process-fy24)for further information about the 366A.
2. Attach a budget narrative that corresponds with the 366A(s), describes how costs within the budget categories were derived, and demonstrates links between expenditures and specific activities/tasks. The budget narrative will include the administrative needs of all Summer EBT agencies and local educational agencies [see [7 CFR 292.8(e)(3)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(3))].
3. The Summer EBT agency attests that the attached 366A expenditure plan(s) and budget narrative comply with any standards prescribed by the Secretary for the use of these funds.

*Initial Here*

# Section 2: Issuance [[7 CFR 292.8(e)(10)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(10))]

1. Provide an estimate of the number of children who will be served for the year this plan covers [[7 CFR 292.8(e)(2)](https://www.ecfr.gov/current/title-7/part-292/subpart-C#p-292.8(e)(2))]:

*Instructions: Provide an estimated number of children that will be served in Summer EBT during the year this plan covers. A good starting point for calculating your estimate is the number of children who are eligible for Free and Reduced-Price (FRP) meals in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) within your geographic State or ITO service area. The number of free and reduced-price eligible children is reported annually each year on the FNS-10: Report of School Program Operations. The number reported on this form can inform estimates. Additionally, FNS’ Summer EBT toolkit provides estimates that may be used as a reference point:* [*Estimated Number of Summer EBT Eligible Children*](https://www.fns.usda.gov/sebt/estimated-children-eligible)*. ITOs may contact the FNS regional office for assistance in determining the number of FRP children in their service area.*

1. Provide the start and end dates of the summer operational period and an explanation for why these dates were selected [[7 CFR 292.2](https://www.ecfr.gov/current/title-7/section-292.2); [7 CFR 292.8(e)(10)(i)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(10)(i))]:

First day of the summer operational period: mm/dd/yy

Last day of the summer operational period: mm/dd/yy

Explanation:

*Instructions: Summer operational period* [[7 CFR 292.2](https://www.ecfr.gov/current/title-7/section-292.2)*] means the benefit period that generally reflects the period between the end of classes during the current school year and the start of classes for the next school year, as determined by the Summer EBT agency [*[7 CFR 292.2](https://www.ecfr.gov/current/title-7/section-292.2)*]. The summer operational period does not need to align with calendar months, nor does it need to be 3 months in duration (participants will get $120 per summer regardless of the number of days that they’re out of school). The Summer EBT agency should review school calendars within the State or ITO and select start and end dates that will allow students to access benefits when they are not in school and not able to access school meals. Given the variation in school calendars within States and ITOs, it is reasonable to designate a summer operational period that includes days when some students are still in school, and does not include days when some kids are on break. The objective is to select dates that are generally reflective of school calendars in the State or ITO.*

For example, if schools in a State or ITO generally start summer break the second week of June and resume school the last week of August, the Summer EBT agency could select a summer operational period that runs from June 15 – August 25. These dates cover the majority of summer break for most children in the State or ITO. The Summer EBT agency could provide a $120 benefits June 8 (7-14 days before the start of the summer operational period), or they could provide benefits in multiple issuances. For example, issue $40 on June 8, July 6, and August 3, for a total of $120 over the course of the summer.

*Reminder: To the extent feasible in 2024, benefits must be issued and available for children to spend at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. However, benefits expunge 122 days after issuance, so some benefits will be spent after the end of the summer operational period. Children have until the last day of the summer operational period to apply for benefits using a Summer EBT application. If flexibility with timeframes for benefit issuance is needed in 2024, the State should* indicate the reason for the delay.

1. Provide the date(s) when benefits will be issued [[7 CFR 292.8(e)(10)(ii)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(10)(ii))], [7 CFR 292.15(c)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(c))]:

First issuance: mm/dd/yy

Second issuance (if applicable): mm/dd/yy

Third issuance (if applicable): mm/dd/yy

Additional information on schedule for benefit issuance, if any:

*Instructions: Benefits are ‘issued’ when they are loaded onto EBT accounts and available for the participant to spend. For example, if a Summer EBT agency loads benefits on accounts and mails cards in early May, but sets the availability date on those benefits to June 1, the benefits are not considered to be ‘issued’ until June 1 because that’s when the benefits are available to spend. Issuance is not the same as loading benefits on EBT accounts or mailing EBT cards. Summer EBT agencies may opt to provide households with their benefits in one issuance or in multiple issuances. The first, or only, if applicable, issuance must be provided at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. Summer EBT agencies have the flexibility to determine the timing of subsequent benefit issuances, e.g. monthly issuances. If the Summer EBT agency plans to stagger issuances throughout the month or otherwise modify that issuance schedule, an explanation should be provided under additional information. If flexibility with timeframes for benefit issuance is needed in 2024, the State should indicate the reason for the delay.*

1. Does the State or ITO service area have Local Education Agencies (LEAs) operating on a continuous school calendar [[7 CFR 292.2](https://www.ecfr.gov/current/title-7/section-292.2)]?

Yes (complete the rest of this question)

No (skip to question 5)

If yes, describe the school calendar(s) and break schedule(s) for LEAs operating on a continuous school calendar [[7 CFR 292.15(b)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(b))]:

Provide date(s) or timeframes when benefits will be issued:

First issuance: mm/dd/yy

Second issuance (if applicable): mm/dd/yy

Third issuance (if applicable): mm/dd/yy

Any additional information on the schedule(s) for benefit issuance:

*Instructions: SEA instructions: Continuous school calendar means a situation in which all or part of the student body of a school is (a) on a vacation for periods of 15 continuous school days or more during the period October through April and (b) in attendance at regularly scheduled classes during most of the period May through September.*

*Regardless of when benefits are issued, children attending schools operating on a continuous school calendar must receive the equivalent of three months of benefits ($120 in 2024), consistent with children who have a traditional summer break [*[7 CFR 292.15(e)(4)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(e)(4))*].*

1. Benefits will be provided using (select all that apply) [[7 CFR 292.15(c)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(c)(2))]:

|  |  |
| --- | --- |
|  | An existing EBT account used to deliver other electronic benefits  Describe the existing account to which benefits will be added (e.g. SNAP or WIC) and how they will be separately tracked in that account (e.g. a different benefit type or sub-type): |
|  | A unique account for Summer EBT only |
|  | Other payment instrument (provide explanation): |

*Instructions: Summer EBT benefits may be loaded on an existing EBT account associated with an existing EBT card (e.g. SNAP for State or WIC for ITOs), or a new EBT account and card may be issued for Summer EBT only. A Summer EBT agency that opts to co-load Summer EBT benefits on existing EBT accounts will need to also issue new Summer EBT accounts/cards for eligible children who are not a member of a household with an existing EBT account. Check the box(es) that corresponds to your planned method for providing benefits. If ‘other’ is selected, provide an explanation. Use of EBT cards is the industry standard for SNAP and WIC, and FNS expects that Summer EBT agencies will issue Program benefits on EBT cards in a similar manner to SNAP or WIC. However, Section 13A(b)(2)(B) of the* [Richard B. Russell National School Lunch Act](https://www.govinfo.gov/content/pkg/COMPS-10333/pdf/COMPS-10333.pdf) *allows benefits to be issued through another electronic means, as determined by the Secretary. In the event a Summer EBT agency wants to adopt a new method of Summer EBT payment, such as payment with a mobile phone, USDA will work with the Summer EBT agency to determine whether and how this can best be executed while still meeting other program requirements. Some Territories operating the Nutrition Assistance Program (NAP), including American Samoa and the Commonwealth of the Northern Mariana Islands, do not currently issue Program benefits electronically. For these agencies, Summer EBT benefits may be issued in the same manner as NAP benefits.*

1. Summer EBT agencies will need to issue new accounts/cards for children who are not associated with an existing EBT account, or for all children if the Summer EBT agency does not choose to co-load benefits on existing accounts for children who have them (see question 5) [[7 CFR 292.15(c)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(c)(2))]. Benefits that are not loaded on existing EBT accounts will be issued:(select all that apply):

|  |  |
| --- | --- |
|  | On one account/card to heads of households, to the extent States and ITOs have contact information and can determine which children are in a household |
|  | To each eligible child on account/card |

*Instructions: The Summer EBT agency will need a plan to provide benefits to eligible children whose benefits are not loaded on an existing EBT account, either because the Summer EBT agency chooses not to co-load benefits or because the child is not associated with an existing EBT account (e.g., a SNAP or WIC account). The Summer EBT agency may provide each eligible child with their own Summer EBT card and/or issue cards to the head of household, grouping children in households as able.*

1. Describe the procedures the Summer EBT agency will implement to provide access to households experiencing homelessness and other vulnerable populations, e.g., children in foster care, children from households with limited English proficiency [[7 CFR 292.8(e)(10)(vi)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(10)(vi)), [7 CFR 292.15(c)(1)(v)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(c))].

*Instructions: Summer EBT agencies are responsible for assisting children who do not live in a permanent dwelling or have a fixed mailing address so they may obtain Summer EBT benefits. This can be accomplished by assisting such households in finding an authorized representative who can act on their behalf, or through other appropriate means. For example, schools have social workers or coordinators for homeless children who may be able to assist these households. Vulnerable populations such as these may need benefits quickly to meet an acute need.*

1. Describe the claims procedures for cases of erroneous payments in accordance with requirements at [7 CFR 292.27](https://www.ecfr.gov/current/title-7/section-292.27).

*Instructions: Summer EBT agencies must develop a process to manage cases of erroneous issuances and pursue claims against a household, as appropriate. Summer EBT agencies have the discretion to determine when to pursue a claim when erroneous issuances are discovered based on cost effectiveness or the individual circumstances. Most children who receive Summer EBT benefits will be enrolled through streamlined certification with no action on the part of the household required. Therefore, a child enrolled through streamlined certification might unknowingly use benefits that were issued in error, including a situation where the child’s household applies for duplicate benefits because they are not aware of their automatic enrollment. It may be a significant burden on low-income households to pay back benefits already spent, especially when they were unaware of the error and do not have sufficient funds on hand to pay the claim. To the maximum extent practicable, Summer EBT agencies should limit claims against households to situations where there is evidence that the household knowingly obtained benefits through fraudulent activities. To limit risk of unintentional use of erroneous benefits, Summer EBT agencies have the responsibility to communicate eligibility determinations to households and provide sufficient information for households to determine their eligibility status and the amount they should be issued. In addition, Summer EBT agencies may not reclaim Summer EBT benefits by reducing a household’s SNAP or WIC benefit. Summer EBT agencies must also develop a process to allow households to submit a claim for benefits that were not issued or issued in the incorrect amount.*

1. Describe the plan to ensure that Summer EBT benefits are issued to children based on their eligibility at the end of the instructional year immediately preceding each summer [[7 CFR 292.8(e)(6)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(6)); [7 CFR 292.12(e)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(e)(2)); [7 CFR 292.12(f)(4)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(f)(4))].

*Instructions: Summer EBT agencies have the responsibility to ensure that all children identified as eligible at any time during the instructional year still reside in the State or ITO at the time benefits are issued. For example, a child who enrolls in school in September and moves to another State in December should not be issued benefits from the State they moved from, even though they were certified for SNAP (or another allowable program) or as FRP eligible in that State in the immediately preceding school year. The child would be streamline certified in the State they moved to in December, or may complete an application if attending an NSLP/SBP school. It would be impractical for Summer EBT agencies to confirm school enrollment at the very end of the school year given the time it takes to pull data and issue cards. However, Summer EBT agencies must still have a plan to confirm that a child has not left the State or service area. Summer EBT agencies can accomplish this by establishing a process for confirming that children identified as eligible earlier in the instructional year are still students within the State or ITO’s school system by using other administrative databases such as SNAP rolls. Ideally, this check would occur right before Summer EBT issuance lists are finalized so the most current information is used. In addition, the Notice of Approval that goes to households should include a statement communicating that households that are erroneously issued duplicate benefits from more than one State or ITO should only use benefits from the State or ITO where their child(ren) completed the instructional year immediately preceding the summer operational period. Under no circumstances may they use both.*

*USDA intends to provide flexibility as Summer EBT agencies work to stand up this program. Summer EBT agencies are best positioned to determine a process and timeline that make sense given the individual confines of their program. Summer EBT agencies should include timelines for finalizing data and issuing benefits and should justify why this is reasonable given the requirements of the law.*

# Section 3: Enrollment and Verification

1. Streamlined Certification [[7 CFR 292.12(d)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(d))]
   1. Program data that will be used to enroll children through streamlined certification (check all that apply):

|  |  |
| --- | --- |
|  | NSLP/SBP free and reduced price lists (required) |
|  | SNAP (required) |
|  | TANF (Temporary Assistance for Needy Families) (required if used for Direct Certification in the school meal programs) |
|  | FDPIR (Food Distribution Program on Indian Reservations) (required if used for Direct Certification in the school meal programs) |
|  | Medicaid data confirming Summer EBT income eligibility (only allowed if participating in the Direct Certification with Medicaid Demonstration projects in the school meal programs – this means the State is approved to use the income information from Medicaid eligibility or enrollment files to assess whether a student is eligible for free or reduced price meals based on household income |
|  | Other (explain how the income eligibility guidelines for each align with Summer EBT requirements, as well as how each program’s eligibility is determined): |

*Instructions: Check each box that corresponds to data you will use to enroll children through streamlined certification. If the ‘other’ box is checked, provide an explanation of this data including a detailed justification for how the program’s eligibility standards and certification processes provide assurance that participating children also meet the eligibility requirements.*

* 1. Describe how, when, and in what format the Summer EBT agency will obtain data on eligibility determinations made by LEAs (i.e., children certified by schools through an NSLP/SBP application or categorial eligibility). Address specific data needs such as the child’s date of birth, mailing address, and other information required to issue benefits. Address how data confidentiality will be maintained [[7 CFR 292.12(b)-(d)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(b))].

*Instructions: Summer EBT agencies will issue benefits to a significant portion of eligible children using data that are already available at the LEA level. To facilitate this, Summer EBT agencies must be able to efficiently collect student eligibility data from all NSLP participating LEAs in a format that has all the necessary elements and can be manipulated for Summer EBT use. This includes data necessary to match and deduplicate records, and complete mailing addresses. The* [*Summer EBT Playbook*](https://codeforamerica.org/resources/summer-ebt-playbook/) *developed by Code for America and Share our Strength discusses approaches that the Summer EBT agency could employ.*

* 1. For each other data source listed above, describe how, when, and in what format the Summer EBT agency will obtain data sufficient to determine a child’s eligibility for Summer EBT. Address specific data needs such as the child’s date of birth, mailing address, and other information required to issue benefits. Address how data confidentiality will be maintained [[7 CFR 292.12(b)-(d)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(b))].

*Instructions: Summer EBT agencies will issue benefits to a significant portion of eligible children using only data that are already available at the State or ITO level. To facilitate this, Summer EBT agencies must be able to efficiently collect eligibility data from programs used for direct certification in the NSLP, and any other programs approved by USDA to use for streamlined certification. This data must be sufficient to confirm the child’s income eligibility, match and deduplicate records, and mail cards, as necessary.*

*The* [*Summer EBT Playbook*](https://codeforamerica.org/resources/summer-ebt-playbook/) *developed by Code for America and Share our Strength discusses approaches that the Summer EBT agency could employ.*

* 1. For the purposes of streamline certifying children without matching to NSLP enrollment provide the State or ITO’s legal ages of compulsory school enrollment [[7 CFR 292.2](https://www.ecfr.gov/current/title-7/section-292.2); [7 CFR 292.12(d)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(d))].

Minimum age:

Maximum age:

*Instructions: The compulsory school age is the ages during which attendance in school is required by State or Tribal law. This should not be confused with the minimum or maximum age to which free education must be offered by a State or ITO. A child must be within that age range and categorically eligible during the Summer EBT Period of Eligibility in order to be eligible for streamlined certification.*

* 1. Describe the process you will use to compile your issuance list from the data sets used for streamlined certification [[7 CFR 292.12](https://www.ecfr.gov/current/title-7/section-292.12)].

*Instructions: The Summer EBT agency must take participation lists from programs approved for streamlined certification and remove duplicate children, as well as children who are not school aged, consistent with the State or ITO’s legal ages of compulsory school enrollment. Describe this process. Reminder, children attending NSLP schools do not need to be of compulsory school age to participate in the Program.*

* 1. Describe the process to encourage and facilitate households to provide updated contact information for the purpose of receiving Summer EBT.

*Instructions: Summer EBT agencies must establish procedures to allow households to provide updated contact information for the purpose of receiving Summer EBT. This is especially important for households that applied for NSLP benefits with a school meal application. It is not uncommon for households to move during the school year or provide incomplete contact information when enrolling children in school. Allowing households to easily update their contact information before cards are mailed will reduce the number of cards that are returned.*

* 1. Describe the process for households to confirm eligibility status and unenroll if they do not want to receive benefits [[7 CFR 292.8(e)(11)(iii)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(11)(iii)); [7 CFR 292.12(b)(3)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(b)(3))].

*Instructions: Summer EBT agencies must develop a process to enable anyone who has been determined to be eligible for Summer EBT benefits to see that they are eligible and unenroll, or opt-out, of the Program if they prefer. This must be included in notice of eligibility and enrollment.*

*Children from households which notify the Summer EBT agency that they do not want Summer EBT benefits should not be issued benefits, or must have their benefits discontinued as soon as possible, if already issued. If a Summer EBT agency is not able to stand up an opt-out system in the immediate term, the agency may work with their RO to implement flexibilities for 2024, such as directing households that do not want to participate to destroy their Summer EBT cards. Any notification from the household declining benefits must be documented and maintained on file, as required under 7 CFR 292.23, to substantiate any change in benefits. Households that opt out of the Program may contact their Summer EBT agency at any time before the end of the summer operational period to request reenrollment.*

1. Applications [[7 CFR 292.8(e)(7)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(7))]
2. For 2024, Summer EBT applications will be processed by (choose one) [[7 CFR 292.13](https://www.ecfr.gov/current/title-7/section-292.13)]:

The Summer EBT agency

LEAs

The Summer EBT agency and LEAs

*Instructions: Summer EBT applications are ultimately the Summer EBT agency’s responsibility. Recognizing that Summer EBT agencies may need operational flexibilities as they launch their programs, in Summer 2024 only, Summer EBT agencies may delegate (i.e., assign) activities related to Summer EBT applications to LEAs, but the Summer EBT agencies must pay for new costs associated with processing Summer EBT applications. For example, if a Summer EBT agency needs a large LEA to collect applications for Summer EBT in 2024, the Summer EBT agency may delegate application activities to the LEA and cover all costs associated with Summer EBT activity. Summer EBT agencies do not need to cover LEA costs already associated with alternative applications not used for Summer EBT purposes. In Summer 2025 and beyond, Summer EBT agencies may enter into contracts or other similar arrangements with LEAs to process applications, but they cannot compel them to do so. See* [Summer EBT Questions & Answers #17 & 18](https://www.fns.usda.gov/sebt/questions-answers) *for more information.*

1. Will alternative income applications be used in 2024?

Yes

No

      If yes, initial here to attest that the alternative applications collect enough information to determine program eligibility.

*Instructions: During summer 2024, alternative income applications that are currently used in some NSLP special provision schools may be used to confer eligibility if they allow a Summer EBT agency to determine whether the household is at or below NSLP/SBP reduced price income threshold. States, ITOs, and LEAs may use their alternative income applications for Summer EBT in 2024 or make a Summer EBT application available for children, which could be the USDA prototype application.*

*Alternative income applications refers to forms that are used to determine household income for programs or reasons other than USDA programs. These forms are used by some LEAs to collect information at their special provision schools that would have otherwise been collected through NSLP/SBP applications on an annual basis. These applications may also be referred to as “family income surveys” or “household income data forms.” Data collected through alternative income applications are used for purposes not related to the school meal programs, such as determining education funding allocations, and other student benefits. It is the responsibility of the Summer EBT agency to ensure that alternative income applications meet the requirements for 2024.*

*See* [Summer EBT Questions & Answers #19](https://www.fns.usda.gov/sebt/questions-answers) *for more information.*

1. Describe the data and processes used to confirm that an applicant for Summer EBT is enrolled at an NSLP/SBP school and that they are not issued duplicate benefits through the streamlined certification [[7 CFR 292.8(e)(7)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(7)), [7 CFR 292.12(e)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(e)(2))].

*Instructions: Summer EBT agencies must be able to confirm whether children on applications are enrolled in NSLP/SBP-participating schools within the State or ITO service area, as applicable, for the purposes of certifying children for Summer EBT benefits and detecting and preventing duplicate benefit issuance for children that were already certified through streamlined certification.*

*Summer EBT agencies must ensure the confidentiality of all such data, and the data must be used only for the purposes of the Summer EBT Program, or to provide other social service benefits to eligible children.*

*State Summer EBT agencies must make this data available to ITO Summer EBT agencies for children within an ITO’s Summer EBT service area, in a timeframe that allows ITO Summer EBT agencies to issue timely benefits. ITO Summer EBT agencies must ensure confidentiality of the data. Procedures to share data will be included in any State-ITO agreement.*

1. Describe how data confidentiality will be maintained [[7 CFR 292.12(c)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(c)(2))].

*Instructions: The Summer EBT agency must ensure the confidentiality of all student data exchanged that is applicable to Summer EBT program eligibility and dual participation; and data must only be used for SEBT program purposes (c)(2), or for the purpose of use or disclosure to provide other social service benefits to eligible children, in accordance with 7 CFR 292.12(c)(2). In addition, student data may only be shared with persons authorized to receive eligibility information consistent with § 292.13(o).*

1. Verification of Summer EBT applications [[7 CFR 292.8(e)(7)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(7))]
2. For 2024, the following types of verification will be implemented [[7 CFR 292.14](https://www.ecfr.gov/current/title-7/section-292.14)]:

Verification for cause (required) [[7 CFR 292.14(a)(1](https://www.ecfr.gov/current/title-7/part-292/section-292.14#p-292.14(a)(1)))]

Direct verification of selected applications (required) [[7 CFR 292.14(e)](https://www.ecfr.gov/current/title-7/part-292/section-292.14#p-292.14(e))]

3% random sample [[7 CFR 292.14(a)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.14#p-292.14(a)(2))]

Alternative verification procedure [[7 CFR 292.14(a)(3)](https://www.ecfr.gov/current/title-7/part-292/section-292.14#p-292.14(a)(3))] (if selected, please describe below):

*Instructions: Verifying officials (i.e., staff that participate in verification activities) do not need to complete verification for all applications. Summer EBT applications will be subject to verification for cause in 2024, a process through which questionable applications are verified on a case-by-case basis. Any application selected for cause must first be directly certified before the household is contacted to request documentation. An additional 3% sample (or proposed alternative procedure) is not required in 2024. However, if you intend to implement a verification procedure beyond verification for cause and direct verification, please indicate that and describe in detail, as applicable.*

*NOTE: NSLP applications that are used to confer Summer EBT eligibility are not subject to Summer EBT verification requirements. However, they are subject to regular NSLP verification procedures, even if the household only applied for NSLP in order to get Summer EBT benefits.*

1. For 2024, Summer EBT applications will be verified by (choose one) [[7 CFR 292.14](https://www.ecfr.gov/current/title-7/section-292.14)]:

The Summer EBT agency

LEAs

The Summer EBT agency and LEAs

*Instructions: Summer EBT applications are ultimately the Summer EBT agency’s responsibility. Recognizing that Summer EBT agencies may need operational flexibilities as they launch their programs, in Summer 2024 only, Summer EBT agencies may delegate (i.e., assign) activities related to Summer EBT applications to LEAs, including verification, but the Summer EBT agencies must pay for all new costs associated with verification. For example, if a Summer EBT agency needs a large LEA to verify applications for Summer EBT in 2024, the Summer EBT agency may delegate verification activities to the LEA and cover all costs associated with Summer EBT verification. In Summer 2025 and beyond, Summer EBT agencies may enter into contracts or other similar arrangements with LEAs to process applications and conduct verification, but they cannot compel them to do so.*

1. For Direct Verification purposes, Program data that will be used to verify selected applications *prior* to contacting a household include (check all that apply) [[7 CFR 292.14(e)](https://www.ecfr.gov/current/title-7/part-292/section-292.14#p-292.14(e))]:

NSLP/SBP free and reduced price lists

SNAP

TANF (Temporary Assistance for Needy Families)

FDPIR (Food Distribution Program on Indian Reservations)

Medicaid (only allowed if participating in the Direct Certification with Medicaid Demonstration

projects in the school meal programs)

Other:

# Section 4: Data Sharing and Preventing Dual Participation

1. Provide plans to coordinate among ITO Summer EBT Program(s) and/or State Summer EBT Program(s), as applicable [[7 CFR 292.8(e)(8)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(8)), [7 CFR 292.9](https://www.ecfr.gov/current/title-7/section-292.9)].

*Instructions: State and ITO-operated Summer EBT programs serving proximate areas must coordinate and communicate to ensure efficient and timely service to eligible individuals and prevent duplicative issuance of benefits. If the geographic State is not operating a Summer EBT Program in 2024, the ITO will coordinate with the State’s designee. If an ITO’s service area crosses geographic State boundaries, the ITO and each applicable Summer EBT agency, or designee of a State covering the geographic area(s) served by the ITO, must coordinate services. FNS regional offices will facilitate discussions and information sharing between States and ITOs, as appropriate.*

***ITO Summer EBT agencies will receive priority consideration to serve eligible children within their service area, as identified in an FNS-approved POM.*** *This means that children from the ITO’s service area who can be enrolled through streamlined certification will automatically be enrolled in the ITO-administered Summer EBT Program, to the maximum extent practicable. However, children from ITO service areas may opt to participate in the State-operated program and opt out of the ITO-operated program if they so choose.*

*State Summer EBT agencies must:*

* *Share student data with the ITO, including student eligibility status and contact information of children deemed eligible within the ITO’s service area.*
* *Provide information in a manner and timeframe that will allow the ITO Summer EBT agency to issue benefits timely.*
* *Ensure the confidentiality of all Program-related student data used to determine Program eligibility and prevent dual participation.*

*ITO Summer EBT agencies and the State Summer EBT agencies serving proximate areas must:*

* *Ensure the coordination of Summer EBT program services, which may include a written agreement between both parties.*
* *Notify eligible children or households that they may choose to receive Summer EBT program benefits from either the State or the ITO Summer EBT agency.*
* *Provide referral information to the alternative program upon a child or household’s request, thereby facilitating household choice.*

1. Provide procedures to detect and prevent dual participation [[7 CFR 292.8(e)(9)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(9)); [7 CFR 292.9(b)(3);](https://www.ecfr.gov/current/title-7/part-292/section-292.9#p-292.9(b)(3)) [7 CFR 292.12(c)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(c)); [7 CFR 292.12(f)(4)](https://www.ecfr.gov/current/title-7/part-292/section-292.12#p-292.12(f)(4)); [7 CFR 292.15(d)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(d))], which includes:

* A child simultaneously receiving benefits from more than one State or ITO-administered Summer EBT program or,
* A child simultaneously receiving multiple allotments from the same State or ITO-administered Summer EBT program.

*Instructions: Dual participation means a child simultaneously receiving benefits from more than one State or ITO-administered Summer EBT program, or simultaneously receiving multiple allotments from the same State or ITO-administered Summer EBT program. Relatedly, duplicate benefit issuance includes situations where the Summer EBT agency allows an eligible household to dual participate. For example, a child who moves in the spring may not receive a benefit from both the State they left and from the State to which they moved. Likewise, a child living within an ITO Summer EBT agency’s service area may not receive benefits from the ITO-administered program and a State-administered program that operates in a proximate geographic area, nor may they receive benefits from two ITO-administered programs.*

*State and ITO Summer EBT agencies must work together to prevent dual participation, particularly in State border areas and around ITO service areas and must establish detection and prevention procedures in their POMs. Summer EBT agencies could choose to adapt systems already in place for their counterpart SNAP or WIC program, or propose an alternative approach.*

*In addition, a participant’s notice of approval must include a statement communicating that households that are erroneously issued duplicate benefits from more than one State or ITO should only use benefits from the State or ITO where their child(ren) completed the instructional year immediately preceding the summer operational period. Under no circumstances may they use both, which would be dual participation. A State or ITO-level database could be used to detect and prevent duplicate benefit issuance and increase data integrity across the Summer EBT program.*

# Section 5: Customer Service Plan

1. Provide a customer service plan that includes [[7 CFR 292.8(e)(11)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(11)); [7 CFR 292.15(g)](https://www.ecfr.gov/current/title-7/part-292/section-292.15#p-292.15(g))]:
2. A single point of contact for all customer service information and inquiries including a hotline and website;
3. A plan to inform eligible households of the availability of Program benefits and the process to apply for benefits, if necessary; and
4. A simplified process for households to opt out of the program.

*Instructions: Although Summer EBT Program implementation will be a partnership between agencies in most cases, Summer EBT must be a unified program from the perspective of participants. Summer EBT customer service plans must include a single point of contact for all customer service information and inquiries and must include a telephone hotline and website. In addition, the customer service plan must communicate how households can opt out of participating in the Program.*

*Because Summer EBT is a new program, stakeholders at all levels need information that clearly explains what the Program is, who is eligible, and how benefits can be accessed and redeemed. Summer EBT agencies will need to provide information to clarify differences between Summer EBT and PEBT.*

*Summer EBT agencies must provide written materials to each household prior to Summer EBT issuance and as needed during ongoing operation of the Summer EBT Program. At a minimum, the household materials must provide information including, but not limited to: where benefits can be used, what foods are eligible for purchase, unallowable uses of benefits and penalties for misuse, use of security Personal Identification Numbers (PINs), how families may access customer service supports during non-business hours, the eligibility criteria for benefits, disclosure information regarding adjustments and a household’s rights to notice, fair hearings, and provisional credits, and must include the USDA statement of non-discrimination and be prepared at an educational reading level suitable for participant households. These standards are a minimum, and USDA highly encourages Summer EBT agencies to maintain more frequent contact with eligible households to ensure they have the information they need to access program benefits. Examples include providing information through the schools before the end of the school year, robo-calls and texts to families to remind them that they have benefits available to spend, and social media ads. Summer EBT agencies should consider how they can incorporate outreach throughout the summer period in a manner that is inclusive of individuals with disabilities or limited English proficiency, and people who are unhoused, or generally are not well connected with community services or media.*

# Section 6: Program Violations

1. Provide a plan for timely and effective action against program violators [[7 CFR 292.8(e)(4)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(4)), [7 CFR 292.25](https://www.ecfr.gov/current/title-7/section-292.25)].

*Instructions: The Summer EBT agency must promptly investigate complaints received or irregularities noted in connection with the operation of the Program and must take appropriate action to correct any irregularities including, but not limited to, disqualification and claims. As Summer EBT adapts aspects of WIC, SNAP, and Child Nutrition Programs, some program violations will be similar to violations seen in these programs, and may benefit from similar processes.*

1. Attach a copy of the Summer EBT agency’s fair hearing procedures for participants [[7 CFR 292.8(e)(12)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(e)(12)), [7 CFR 292.26](https://www.ecfr.gov/current/title-7/section-292.26)].

*Instructions: See regulations at* [*7 CFR 292.26*](https://www.ecfr.gov/current/title-7/section-292.26) *for complete hearing requirements to help complete this requirement.*

# Section 7: Indian Tribal Organizations

In addition to Sections 1-6, provide the below information if you are an ITO administering the Summer EBT program.

**Required Attachments:**

|  |  |
| --- | --- |
|  | A map or other visual reference aid of the service area of the ITO, including a description of any areas beyond the ITO’s jurisdiction that the ITO proposes to serve [[7 CFR 292.8(f)(1)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(1))]. |

*Instructions:* ITO service area means the geographic area served by an ITO Summer EBT agency. In WIC, ITO service areas have typically included reservations, or specific Tribal lands in Oklahoma. FNS expects that ITOs will continue to use existing Tribal service areas for the purposes of Summer EBT. However, if an ITO proposes to serve children in areas beyond typical WIC or FDPIR service areas, potentially including other Tribal areas, the ITO must indicate the modified service area, as appropriate and only applicable to Summer EBT. The map or visual reference should include a description of any Tribal areas outside of the ITO’s typical jurisdiction (e.g., other Tribal areas) that they propose to serve, if applicable. Please note, if an ITO’s service area crosses geographic State boundaries, the ITO and each applicable State Summer EBT agency, or designee of a State covering the geographic area(s) served by the ITO, must coordinate services.

1. A plan and procedures to enroll children already deemed eligible by a State Summer EBT agency serving the same geographic area, without further application [[7 CFR 292.8(f)(2)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(2))].

*Instructions: The State Summer EBT agency must share data, including household contact information, indicating those individuals deemed eligible in the ITO Summer EBT agency’s service area in a manner and timeframe that will allow the ITO Summer EBT agency to issue program benefits timely. The ITO Summer EBT agency must receive priority consideration to serve eligible individuals within its service area. Please indicate the ITO Summer EBT agency’s plans to work with the State Summer EBT agency to obtain necessary data, including reference to any informal or formal discussions or agreements on-topic.*

1. A plan and procedures to determine eligibility for and enroll children who must apply through the ITO Summer EBT agency to receive benefits because they have not already been identified as eligible (i.e., via streamlined certification or the State Summer EBT agency) [[7 CFR 292.8(f)(3)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(3))].

*Instructions: Summer EBT agencies must enroll eligible children in Summer EBT if it is determined that they meet the requirements to receive free or reduced-price meals, as determined through a complete Summer EBT application. The ITO Summer EBT agency must use the eligibility criteria under* [*7 CFR 292.6*](https://www.ecfr.gov/current/title-7/section-292.6)*. The Summer EBT agency will need a plan to develop, distribute, collect, and process Summer EBT applications consistent with the Summer EBT standards. Describe this process, why it is appropriate and accessible for the population served, and how the Summer EBT agency will ensure integrity throughout.*

1. A description of the benefit delivery model to be used including how the benefit issued will be equal to or not exceed $120 for summer 2024. The ITO Summer EBT agency must use the same benefit model for all participants throughout its service area [[7 CFR 292.8(f)(4)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(4)); [7 CFR 292.19(a)](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(a))]. Select one:

|  |  |
| --- | --- |
|  | Cash-value benefit model (CVB). Describe: |
|  | Food package model. Describe, including a chart or table detailing the types and quantities of foods which can be purchased with Summer EBT benefit, as well as the average cost of each within the ITO service area: |
|  | Combination of CVB and food package. Describe: |
|  | Alternative benefit delivery model. Describe: |

*Instructions: SEA instructions: An ITO Summer EBT agency’s POM must include a description of the benefit delivery model to be used (i.e., a cash-value benefit (CVB) model, a food package model, a combination of the two, or an alternate model) and must also provide the list of supplemental foods which participants can purchase upon enrollment in the Summer EBT Program. ITOs should explain their model and why it is appropriate for their participants.*

*ITOs using a CVB-only benefit delivery model must issue a benefit level equal to $120 per summer in 2024. For ITOs using a food package benefit delivery model, a combination CVB and food package benefit delivery model, or an alternate benefit delivery model, the benefit level cannot exceed $120 per summer at the time of initial submission of the POM.*

*ITOs proposing to use a food package or similar model should include a chart or table detailing the types and quantities of foods which can be purchased with Summer EBT benefits, as well as the average cost of each within the ITO service area, to establish that the value of the package does not exceed $120 per summer. Although, prices for individual items may vary over time or by retailer, ITO Summer EBT agencies will not be required to cover the difference when a child’s food costs exceed $120/summer at the point of sale, provided that the child’s purchases follow the ITO’s approved food package. Accordingly, it is important that ITOs provide FNS detailed information on their proposed package and average costs within the ITO service area so that the estimated cost of the food package is as accurate as possible.*

1. A list of supplemental foods for which participants can transact upon enrollment, excluding infant formula and infant foods [[7 CFR 292.8(f)(5)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(5)); [7 CFR 292.19(a)(3)](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(a)(3))].

*Instructions: Specifications for supplemental foods are included in* [*7 CFR 292.19(a)(3)*](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(a)(3))*.* *Supplemental foods* mean*, for the purposes of Summer EBT, foods:*

1. *containing nutrients determined by nutritional research to be lacking in the diets of children; and*
2. *promoting the health of the population served by the program under this section, as indicated by relevant nutrition science, public health concerns, and cultural eating patterns, as determined by FNS; and*
3. *Supplemental foods authorized for the WIC Program by the applicable WIC ITO meet the requirements set forth in this subparagraph, excluding infant foods and infant formula.*

*The ITO Summer EBT agency does not need to provide its entire WIC product list for Summer EBT or use the same foods in the Summer EBT Program as the WIC Program. However, the ITO should indicate what WIC foods will be allowed in Summer EBT, describe any additional foods not included on the WIC product list that will be offered for Summer EBT.*

1. Requirements for vendors to transact and redeem Summer EBT Program benefits [[7 CFR 292.8(f)(6)](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(6)); [7 CFR 292.19(a)](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(a))]. Check each of the following to verify compliance:

|  |  |
| --- | --- |
|  | Only vendors authorized by the ITO to accept WIC benefits will be eligible to enroll in the ITO’s Summer EBT Program. |
|  | Only vendors that can accept the ITO-defined benefit, as identified in the POM and subject to FNS approval, will be eligible to enroll in the ITO’s Summer EBT Program. |
|  | Enrolled vendors will only provide foods from the ITO-submitted, approved foods list. |
|  | Enrolled vendors will charge prices for eligible food items which are reasonable for the area(s) served and are at the current price or less than the current price charged to other customers. |

*Instructions: As a prerequisite, vendors must be approved for participation in the ITO’s WIC Program in order to participate in their Summer EBT Program. The ITO Summer EBT agency must attest that it will comply with the required vendor standards by checking the boxes listed in this section.*

1. A plan for providing technical assistance and training to vendors enrolled to transact and redeem Summer EBT program benefits [[7 CFR 292.8(f)(7)]](https://www.ecfr.gov/current/title-7/part-292/section-292.8#p-292.8(f)(7)).

*Instructions: Because WIC vendors are authorized by WIC agencies, the ITO Summer EBT agency must support and monitor enrolled Summer EBT program vendors so they are able to support Summer EBT purchases. Summer EBT agencies should, at a minimum, address how they will inform vendors about Summer EBT, train vendors to recognize and accept the benefit, train vendors to offer enough authorized supplemental foods to meet demand, and provide technical assistance, as needed.*

1. Provide a plan for enrolling vendors, including how the ITO Summer EBT agency will seek out such vendors for participation in the Program [[7 CFR 292.19(c)](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(c))].

*Instructions: As a prerequisite, vendors must be approved for participation in the ITO’s WIC Program in order to participate in their Summer EBT Program. The ITO Summer EBT agency must describe how it will enroll and hold vendors in the Summer EBT Program.*

1. Provide a plan for vendor integrity and monitoring. Describe how vendors that will be held accountable to meet all other applicable vendor-specific program requirements in [7 CFR 292.19](https://www.ecfr.gov/current/title-7/section-292.19), as well as any additional requirements set by the ITO Summer EBT agency which are consistent with regulation [[7 CFR 292.19(c)](https://www.ecfr.gov/current/title-7/part-292/section-292.19#p-292.19(c))].

*Instructions: The ITO Summer EBT agency must set forth a system which ensures:*

* *Requirements and restrictions on the participation of vendors and the transaction of food benefits described at* [*7 CFR 246.12*](https://www.ecfr.gov/current/title-7/section-246.12) *apply to activities involving Summer EBT benefits; and*
* *Vendors are subject to the actions and penalties described at* [*7 CFR 246.12*](https://www.ecfr.gov/current/title-7/section-246.12) *of this chapter for noncompliance or violations involving Summer EBT benefits; and*
* *The standards for determination and disposition of claims against vendors described at* [*7 CFR 246.12*](https://www.ecfr.gov/current/title-7/section-246.12) *of this chapter apply to Summer EBT benefits;*

*-- or --*

* *Set forth an alternate system to ensure effective vendor management and vendor integrity.*

**Summer EBT Agency Signatures**

|  |  |
| --- | --- |
| COORDINATING AGENCY | PARTNERING AGENCY |
| By (Signature) | By (Signature) |
| Title | Title |
| Date | Date |