

Summer EBT 2025 iPOM and POM Template

Indian Tribal Organizations

Directions

This document is the template for the 2025 Interim POM (iPOM) and the 2025 POM for Indian Tribal Organization (ITO) Summer EBT agencies.

- By August 15, 2024, Summer EBT agencies must submit the information requested in the iPOM section of this document [[7 CFR 292.8\(a\)](#)]. (page 2)
- By February 15, 2025, Summer EBT agencies must submit a full POM with all the information requested in this document [[7 CFR 292.8\(b\)](#)]. (page 3)

FNS will review each iPOM submission and approve or request more information from the Summer EBT agency. If the Summer EBT agency includes additional information in their iPOM submission (i.e., they complete sections of the template that are required for the full POM), FNS will review and provide technical assistance, as necessary, to assist the Summer EBT agency in developing their full POM.

The full POM may be submitted at any time before February 15, 2025. FNS will review POMs when they are submitted with the goal of approving POMs as early as possible to provide more time for program implementation. Summer EBT agencies are encouraged to discuss any challenges or changes from 2024 with FNS before submitting a final 2025 POM. FNS is available to offer technical assistance, review draft language, or provide any other assistance a Summer EBT agency may need.

Please note that FNS is issuing this revised POM template based on feedback from Summer EBT agencies in 2024. We have simplified and streamlined many questions and removed some questions that are no longer relevant. FNS' goal is to continue to simplify the POM process in the coming years. In 2025 we are requesting that Summer EBT agencies submit a POM that details all areas of their plan and provides a full picture of the agency's Summer EBT Program. After 2025, we anticipate that POM templates will allow Summer EBT agencies to affirm that information has not changed from the prior year in most areas. FNS values Summer EBT agency feedback and is committed to continuous improvement of the POM process.

Required Attachments

- [Required for the iPOM]** FNS-366A expenditure plan(s) (section 1.2, page 2)
- [Required for the iPOM]** A budget narrative (section 1.3, page 2)
- [Required for the POM]** [Attachment A - Data collection and use](#) (section 6, page 5)
- [Required for the POM]** 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\(c\)](#), [7 CFR 292.8\(e\)\(1\)](#)]
 - A copy of the agreement(s) is attached.
 - Or*
 - The agreement(s) has not changed since the last POM submission, no resubmission needed.
- [Required for the POM]** A copy of the fair hearing procedures for participants [[7 CFR 292.8\(e\)\(12\)](#); [7 CFR 292.26](#)]
- [Required for the POM]** 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\(f\)\(1\)](#)].

iPOM Requirements – Due not later than August 15, 2024

(may be submitted after August 15 with approved waiver – See 1.4)

- 1.1 Provide an estimate of the number of children who will be served in 2025 [[7 CFR 292.8\(e\)\(2\)](#)]:
- 1.2 Attach FNS-366A expenditure plans(s) that reflect planned Fiscal Year 2025 administrative cost requirements for each Summer EBT agency within the ITO that will draw Summer EBT administrative funds from FNS [[7 CFR 292.8\(e\)\(3\)](#)]. See instructions included with the FNS-366A and Attachment A of policy memo [SEBT 01-2024, FM 01-2024 Summer EBT Administrative Funding Process for FY2024, October 18, 2023](#) for further information about the FNS-366A.
- 1.3 Attach a budget narrative that corresponds with the FNS-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 [[7 CFR 292.8\(e\)\(3\)](#)]. See Summer EBT [budget narrative template](#) and [budget checklist](#).
- 1.4 Waiver request: To request a waiver of the August 15, 2024, deadline to submit the iPOM, the Summer EBT agency must provide the following:
 - 1.4.1 Describe why the waiver is needed and what steps the Summer EBT agency will take to complete the iPOM as quickly as possible:
 - 1.4.2 Describe the expected waiver implementation date and time period:
August 15, 2024, through (the date you expect to submit the iPOM)
 - 1.4.3 Link to or provide a copy of the public notice informing the public about the proposed waiver(s):
 - 1.4.4 Affirmations
 - The waiver will not increase the overall cost of the Summer EBT Program to the Federal Government. If there are anticipated increases, confirm that the costs will be paid from non-Federal funds.
 - The Summer EBT agency will monitor and review implementation of the waiver and report on implementation including a description of how the waiver was implemented and its impact on program administration.

POM Requirements – Due not later than February 15, 2025
(may also be included with the iPOM submission)

2. **iPOM updates**

Include any revisions to the information provided in the iPOM, if necessary.

3. **Summer EBT agencies**

3.1 Coordinating agency: _____

- Is requesting administrative funds through a 366A.
 - Request for administrative funds through a 366A includes local level costs, if applicable.
- Is NOT requesting administrative funds through a 366A.

3.2 Partnering agency: _____

- Is requesting administrative funds through a 366A.
 - Request for administrative funds through a 366A includes local level costs, if applicable.
- Is NOT requesting administrative funds through a 366A.

4. **2025 summer schedule and issuance dates**

4.1 Provide the start and end dates of the summer operational period and an explanation for why these dates were selected [[7 CFR 292.2 “Summer operational period”](#); [7 CFR 292.8\(e\)\(10\)\(i\)](#)]:

First day of the summer operational period: _____

Last day of the summer operational period: _____

Explanation:

4.2 The Summer EBT agency will issue benefits in:

- A single issuance (i.e., lump sum).
- Multiple issuances (e.g., monthly issuances):

4.3 [NUMBER] issuances of \$[AMOUNT] each provided on [DATES].

4.4 Date(s) when benefits will be issued:

Type of enrollment	Date or dates of issuance	Estimated Number of Children Issued by each enrollment type
Streamlined Certification and Summer EBT applications received prior to _____ (fill in the blank for the date by which families will need to apply to be included in the first issuance)	<i>Ex. Date or range of dates that fall between the 7 to 14 days before the start of the SOP</i>	<i>Ex. 100,000</i>
Summer EBT applications received after the issuance file is compiled	Within 15 operational days of receipt of a complete application	<i>Ex. 500</i>
Total number of estimated children:		<i>Ex. 100,500</i>

4.5 Additional information on schedule for benefit issuance or the estimated number of children, if any:

4.6 Does the ITO have Local Education Agencies (LEAs) operating on a continuous school calendar [[7 CFR 292.2 “Continuous school calendar”](#)]:

- Yes (complete the rest of this question)
- No (skip to section 5)

If yes, describe the school calendar(s) and break schedule(s) for LEAs operating on a continuous school calendar and any adjustments to your issuance schedule for children attending these schools, if applicable [[7 CFR 292.15\(b\)](#), [7 CFR 292.15\(e\)\(4\)](#)]:

5. **EBT Issuance**

5.1 Select all that apply [[7 CFR 292.15\(c\)\(2\)](#)]:

- The Summer EBT agency will co-load benefits on existing accounts/cards. Type of account(s) that will co-load (e.g., SNAP, NAP, TANF): _____
- For children whose benefits are not co-loaded on an existing account, the Summer EBT agency will issue one card to each household.
- For children whose benefits are not co-loaded on an existing account, the Summer EBT agency will issue one card to each eligible child.

In order for your EBT processor to successfully issue Summer EBT benefits according to the issuance plan described in this POM, it is critical that Summer EBT agencies and EBT processors work together closely. Failure to do so could negatively impact your ability to timely implement your issuance plan, as required by [7 CFR 292.16](#). The following are required for successful program implementation:

- Update your contract with the EBT processor to implement your issuance plan for Summer EBT 2025. Contact the FNS State Systems Office (SSO) for any questions on your state system or the Advance Planning Document (APD).
- Provide your EBT processor with key information (number of kids to be served, whether you are co-loading Summer EBT benefits on another account such as a SNAP account, issuance schedule, notice requirements, etc.) with sufficient time for them to plan their workload. Please note that it is NOT necessary for your POM or contract amendment to be finalized before sharing information (e.g. issuance dates, method of issuance and estimated number of children) with your EBT processor. This is a dynamic process, and all parties must understand that any data you provide are estimates, and subject to change.

6. Eligibility

6.1 Complete the following table [Attachment A - Data collection and use](#).

6.2 Describe your plans to coordinate with a State Summer EBT agency serving the same geographic area to obtain data sufficient to enroll eligible children in your serve area without further application [[7 CFR 292.8\(f\)\(2\)](#)].

6.3 For the purposes of streamline certifying children without matching to NSLP enrollment lists, provide the State or ITO's legal ages of compulsory school enrollment [[7 CFR 292.2 "School aged"](#); [7 CFR 292.12\(d\)](#)]. ** Please note that children are eligible if they are school age between July 1, 2024, and the last day of your SOP in 2025.*

Minimum age: _____

Maximum age: _____

6.4 [NEW] Statewide database:

Question	Response
Summer EBT agency responsible for maintaining the database:	
Does the Statewide database contain, at a minimum, the following fields? [7 CFR 292.12(c)(1)]	<input type="checkbox"/> Name <input type="checkbox"/> Date of birth <input type="checkbox"/> School/school district where enrolled <input type="checkbox"/> Mailing address <input type="checkbox"/> Individual free or reduced price eligibility status, as applicable <input type="checkbox"/> Any other information needed to issue benefits timely and with integrity, explain:
How will the Summer EBT agency use the statewide database to create the issuance file?	
Can the Summer EBT agency utilize the statewide database to check child enrollment?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Summer EBT agency conducting the enrollment check:	
How will the database be used to confirm that an applicant for Summer EBT is enrolled at an NSLP/SBP school [7 CFR 292.8(e)(7) , 7 CFR 292.12(e)(2)]?	

7. Applications

7.1 In 2025, Summer EBT applications will be processed by [[7 CFR 292.13](#), [7 CFR 292.13\(b\)](#)]:

- The Summer EBT agency.
- LEAs through a contract with the Summer EBT agency (if applicable, new costs associated with application processing and verification must be included in your budget).
- Other: _____

7.2 In 2025, Summer EBT applications will be verified by [[7 CFR 292.14](#)]:

- The Summer EBT agency.
- LEAs through a contract with the Summer EBT agency (if applicable, new costs associated with application processing and verification must be included in your budget).
- Other: _____

7.3 Is the Summer EBT agency proposing an alternative method for verification [[7 CFR 292.14](#), [7 CFR 292.14\(a\)\(3\)](#)] in lieu of the standard 3% random sample [[7 CFR 292.14\(a\)\(2\)](#)]?

- No
- Yes; proposed alternative verification procedures described below:

8. Customer Service Plan

8.1 Describe how you will provide customer service, including the following [[7 CFR 292.8\(e\)\(11\)](#); [7 CFR 292.15\(g\)](#)]:

Requirement	Response
Single point of contact for all customer service information and inquiries including a hotline and website.	Hotline: Website: Other (including the EBT processors Interactive Voice Recognition [IVR] system):
A plan to inform eligible households of the availability of Program benefits and the process to apply for benefits, if necessary.	
A simplified process for households to opt out of the program.	
The process to encourage and facilitate households to provide updated contact information for the purpose of receiving Summer EBT.	
The process for households to confirm eligibility status.	
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) , 7 CFR 292.15(c)(1)(v)].	

9. Program violations and errors

9.1 Provide a plan for timely and effective action against program violators [[7 CFR 292.8\(e\)\(4\)](#), [7 CFR 292.25](#)]. If your Summer EBT mirrors or builds upon your SNAP, WIC or NAP process, you must still provide a description of the plan.

9.2 Describe the claims procedures for cases of erroneous payments in accordance with requirements at [7 CFR 292.27](#).

10. [Optional] – Give yourself some Kudos!

Tell us about something you’re doing that you’re proud of (e.g., improved program implementation, excellent customer service, implementing new systems/technologies).

11. Tribal food package

11.1 The ITO Summer EBT agency will use the following benefit model for all participants throughout its service area [[7 CFR 292.8\(f\)\(4\)](#); [7 CFR 292.19\(a\)](#)]. Select one:

- Cash-value benefit model (CVB). Describe: _____
- Food package model. Describe: _____
- Combination of CVB and food package. Describe: _____
- Alternative benefit delivery model. Describe: _____

11.2 If using a food package model or combination of CVB and food package model, provide a chart or table detailing the types and quantities of foods which can be purchased with Summer EBT benefits, to include the dollar amount of the proposed CVB, as applicable, as well as the average cost of each within the ITO service area. Please note that infant formula and infant foods may not be included in the Summer EBT food package.

Table instructions – examples 1 & 2 are included only to demonstrate how the table is used and can be deleted by the ITO Summer EBT agency. The agency may add more rows if needed.

2025 Food Package			
Item	Quantity	Price per Unit	Average price
<i>Example 1 Dry beans</i>	<i>1 lb</i>	<i>1.76</i>	<i>1.76</i>
<i>Example 2 Cereal</i>	<i>18 oz</i>	<i>0.26</i>	<i>4.68</i>
Total food package cost			

11.3 Total food package cost: * \$ _____

* The total cost of the food package may NOT exceed the 2025 benefit level

11.4 List any supplemental foods that are not included in your WIC food package for which Summer EBT participants can transact upon enrollment [[7 CFR 292.8\(f\)\(5\)](#)].

11.5 Confirm that any non-WIC food items included in your Summer EBT food package meet the nutritional requirements to ‘Contain nutrients determined by nutritional research to be lacking in the diets of children and promote the health of the population served by the program, as indicated by relevant nutrition science, public health concerns, and cultural eating patterns.’ ([7 CFR 292.19\(a\)\(3\)](#)) and ([42 USC 1762\(h\)\(4\)](#)).

- Yes, the [Tribal Nation] confirms they have evaluated their non-WIC food items, and these selections meet the intent of the statute and regulations.
- The food package does not contain non-WIC food items.

12. Tribal – Vendor oversight

12.1 Requirements for vendors to transact and redeem Summer EBT Program benefits [[7 CFR 292.8\(f\)\(6\)](#); [7 CFR 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.

12.2 Provide a plan for providing technical assistance and training to vendors enrolled to transact and redeem Summer EBT program benefits [[7 CFR 292.8\(f\)\(7\)](#)].

12.3 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\(c\)](#)].

12.4 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](#), as well as any additional requirements set by the ITO Summer EBT agency which are consistent with regulation [[7 CFR 292.19\(c\)](#), [7 CFR 292.19\(c\)\(4\)](#)].

12.5 Affirm that the ITO Summer EBT agency will meet all vendor requirements and restrictions set forth in [7 CFR 246.12](#) as applicable to Summer EBT, including:

- Requirements and restrictions on the participation of vendors and the transaction of food benefits described at [7 CFR 246.12](#) apply to activities involving Summer EBT benefits; and
- Vendors are subject to the actions and penalties described at [7 CFR 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](#) of this chapter apply to Summer EBT benefits.

- Yes, the [Tribal Nation] affirms they will meet the requirements and restrictions set forth in [7 CFR 246.12](#) as applicable to Summer EBT

12.6 Affirm that the ITO Summer EBT agency will administer Summer EBT separately and distinctly from WIC. Therefore, the ITO will ensure cost allocation for both of the programs.

- Yes, the [Tribal Nation] affirms Summer EBT will be administered as a different and distinct program from WIC and will appropriately cost allocate for all the work and/or activities between the programs.

FYI - Not Summer EBT-related but WIC-required: If the ITO Summer EBT agency will be authorizing WIC/Summer EBT vendors within another WIC ITO’s tribal jurisdiction, both ITOs must ensure that, per [7 CFR 246.7\(l\)\(2\)](#), a written agreement exists between their WIC agencies to prevent and detect dual participation. WIC regulations require that the WIC State agency is responsible for, “... in areas where geographical or other factors make it likely that participants travel regularly between contiguous local service areas located across State agency borders, entering into an agreement with the other agency for the detection and prevention of dual participation. The agreement must be made in writing and included in the State Plan.” The two WIC State agencies should already have this agreement, provided in their WIC State plans along with their plan for ensuring no dual participation per [7 CFR 246.4\(a\)\(16\)](#), regardless of Summer EBT. If the two WIC State agencies do not have this agreement and plan as part of their existing WIC State Plans, they should submit State plan amendments to do so.

13. **Summer EBT Agency Signatures** - The POM must be signed by the Summer EBT agency or agencies-designated official responsible for ensuring that the Program is operated in accordance with the POM.

TO BE COMPLETED BY THE SUMMER EBT AGENCY OR AGENCIES

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



TO BE COMPLETED BY THE FNS REGIONAL OFFICE

FNS REGIONAL DIRECTOR
By (Signature)
Title
Date