

Summer EBT Technical Assistance Q&As for the EBT Processors

1. Will Summer EBT funds go through the Account Management Agent (AMA)?

No. FNS will provide Summer EBT funding, including administrative funds and benefit funds, through federal grants. States will draw from these Summer EBT grants as they would with any other Federal grant. More information can be found in Memorandum [SEBT 01-2023, Initial Guidance for State Implementation of Summer EBT in 2024, June 7, 2023.](#)

2. Can the Summer EBT agency hire contractors to administer parts of the Summer EBT Program?

Yes. SNAP requirements related to merit personnel do not apply to Summer EBT. However, Summer EBT agencies are ultimately responsible for Program administration, as specified in their federal-state operating agreement.

3. How many months of benefits can be provided each year?

Summer EBT agencies must issue three months of benefits each year. Summer EBT agencies may not prorate benefits for partial months and must issue the full three-month summer benefit to each eligible child.

4. What foods can participants buy with Summer EBT benefits, and where can they buy them?

Participants who receive benefits through SNAP will be able to purchase SNAP-eligible food, as defined in the Food and Nutrition Act, at any retail store approved for participation with SNAP. In territories that administer the Nutrition Assistance Program (NAP) (American Samoa, the Commonwealth of Puerto Rico, and the Commonwealth of the Northern Mariana Islands), participants will be able to purchase NAP-authorized foods at NAP-authorized retailers.

5. Will Summer EBT agencies be allowed to load Summer EBT benefits on EBT cards used in other programs? Can Summer EBT agencies decide to issue one card per household or a card for each eligible child?

Yes. Summer EBT agencies may choose to co-load Summer EBT benefits on existing EBT cards such as SNAP, or issue Summer EBT-only cards. Summer EBT agencies may issue one card per household when household composition is known, or one card for each eligible child. Recognizing that some households are not SNAP-participating and the Summer EBT agency may lack sufficient data to group some children into households,

Summer EBT agencies may implement a combination of these methods, as detailed in their approved POM. Regardless of the method of issuance, Summer EBT agencies must be able to track Summer EBT benefits separately from SNAP, WIC, and other benefit types throughout the issuance and redemption process, and administrative costs must be appropriately allocated.

6. If Summer EBT benefits are co-loaded onto existing SNAP cards, should the use of Summer EBT benefits be prioritized before SNAP benefits?

Yes. If on the same card, Summer EBT benefits must be used before SNAP benefits, because Summer EBT has a shorter expungement timeframe.

7. When must Summer EBT benefits be expunged?

The statute requires that expungement cannot be longer than 4 months. FNS has operationalized this by requiring benefits to be expunged 122 days from issuance. If benefits are provided through more than one issuance (e.g., monthly) expungement must occur 122 days from each issuance.

8. When should States issue benefits?

Each State must determine a summer operational period or periods for the purpose of issuing Summer EBT benefits, which will be included in their approved Plan of Operation and Management (POM). Summer EBT agencies may adopt a standard summer period that is generally reflective of summer break schedules in the State.

For children who can be streamline certified or who have an approved Summer EBT application on file prior to the start of the summer operational period, benefits must be issued and available to use at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. For eligible children who apply after the summer operational period begins, benefits must be issued and available to spend not later than 15 operational days after a complete application is received by the Summer EBT agency.

Summer EBT agencies may opt to provide benefits in one issuance, in accordance with the required timelines, or multiple issuances. Summer EBT agencies that choose to provide benefits in more than one issuance must provide the first issuance 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. Students attending year-round schools should receive benefit amounts consistent with traditional schools. State agencies and LEAs that operate year-round should coordinate to determine when benefit distributions are appropriate based on school calendars.

9. What is the summer operational period?

The summer operational period is the benefit period that generally reflects the

period between the end of classes during the school year and the start of classes for the next school year, as determined by the Summer EBT agency in each State, and approved by USDA.

10. If a State is not able to issue benefits during the summer operational period in 2024, can the State still operate the Program in 2024?

Summer EBT is a seasonal program that is designed to provide benefits to eligible children during a specific window of time annually. In order to meet the nutritional needs of children when they are out of school, Summer EBT agencies must be able to provide benefits to all eligible children during the period of program activity. This is different from P-EBT, where benefits were often not available to eligible households during the time period for which they were earned. That said, USDA understands that it will take time for Summer EBT agencies to develop and implement systems and processes that will reliably deliver benefits during the summer months and may need flexibility in summer 2024. USDA will work with States to develop realistic and reasonable issuance schedules for 2024.

11. Will FNS assist Summer EBT agencies to negotiate modifications to their EBT service contracts?

No. EBT contracts are between the State and their EBT vendor and it would be outside of FNS' purview to negotiate those costs. However, FNS will provide technical assistance to Summer EBT agencies through the Advance Planning Document (APD) process that is currently used by SNAP State agencies. As part of this process, Summer EBT agencies will receive technical assistance from FNS when developing their competitive procurements (including change requests) for EBT services. This assistance could include guidance on ways to reduce cost through improved project planning and reduced customization.

12. Do States need to offer a process for families to decline benefits?

Yes. The statute requires Summer EBT agencies to provide a process for children who are enrolled through streamlined certification to opt-out of participation. For example, Summer EBT agencies may include an opt-out function in their application platform, or direct households to call the customer service line to report that they do not want their child to participate. In the event that a Summer EBT agency is not able to stand up an opt-out system in the immediate term, the agency may contact their FNS regional office to discuss flexibilities for 2024, such as directing households that don't want to participate to cut up their Summer EBT cards.

13. Can Summer EBT agencies replace benefits that were lost as a result of a disaster?

Yes. Summer EBT agencies must make replacement EBT benefits available to a household when the household reports that food purchased with Summer EBT benefits was destroyed in a household misfortune or disaster.