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Summer EBT Q&As

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Program Administration

1. If a State or ITO submits a Notice of Intent but ends up being unable to implement in 2024, will there be any penalties or consequences?

No. States and Indian Tribal Organizations (ITOs) that submit a Notice of Intent but are not able to implement in 2024 will not be penalized. USDA encourages and appreciates States and ITOs that are actively considering and working toward implementation and will provide support and technical assistance as needed in order to successfully establish a Summer EBT program.

However, USDA recognizes that there are many variables at this early stage of implementation that could prevent a State or ITO from being able to implement Summer EBT in 2024.

2. If a State or ITO chooses not to operate Summer EBT in 2024, could they decide to operate the Program in future years?

Yes. If a State or ITO is unable to administer the Program in 2024, the State or ITO will be able to elect to participate in future years. However, FNS strongly encourages States and ITOs to work together to provide Summer EBT benefits to eligible children in 2024. Summer EBT is a permanently authorized program that will be a stable and reliable benefit for families during the summer months. Although it is an option for States and ITOs to administer, they should consider the overwhelming benefit to low-income children and families in their communities, as well as anticipated benefits to local economies. Summer EBT has been tested through a decade of demonstration projects, and rigorous evaluation has shown that Summer EBT effectively mitigates food insecurity and improves diet quality.

3. If a State elects to forgo the opportunity to participate in Summer EBT can a school, community, or unit of local government within that State implement the program on their own?

Per Section 13A of the Richard B. Russell National School Lunch Act—the law authorizing Summer EBT codified at 42 U.S.C. 1762—only States, Territories, and Indian Tribal Organizations that administer the Special Supplemental Program for Women, Infants, and Children (WIC), may administer the Summer EBT Program. The law requires the State to be responsible for the administration of the Summer EBT Program in that State. Therefore, the law does not enable a school, community, or unit of local government like a county to administer Summer EBT in the absence of the State administering the program. In such instances USDA is committed to working with local entities on other possible efforts to alleviate child hunger, including through local efforts to support and sponsor strong congregate feeding sites during the summer. Local entities interested in pursuing such opportunities should contact their respective FNS Regional Office.

4. Do States need to submit a management plan that covers Summer EBT and the SFSP?

No. Summer EBT will have a Plan for Operations and Management (POM) that will be developed and submitted separately from the SFSP Management and Administration Plan (MAP). [[7 CFR 292.8](#)]

5. Which agency is responsible for the Summer EBT Plan for Operations and Management (POM)?

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 any required plans, forms, and reports. The POM must be developed in cooperation with both 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. The POM must address the State or ITO's Summer EBT Program as a whole, even if more than one agency participates in program administration. [[7 CFR 292.2](#); [7 CFR 292.3\(b\)\(1\)\(ii\)](#), [7 CFR 292.8](#)]

6. What is the role of the coordinating agency?

The coordinating Summer EBT agency will be the primary point of contact for the State or ITO's Summer EBT program. The coordinating agency will be USDA's first point of contact for most issues and should be included on all communications between USDA and the partnering agency. The coordinating agency will also be responsible for the complete and timely submission of any required plans, forms, or reports for the Program as a whole including, but not limited to, interim and final plans for operations and management (POMs), notices of intent, and routine reporting to FNS. Each State or ITO will decide how Summer EBT responsibilities are delegated across their administering agencies. To ensure clear roles and responsibilities, the Summer EBT agencies within a State or ITO must enter into an inter-agency written agreement that defines the roles and responsibilities of each, as well as the administrative structure and lines of authority. [[7 CFR 292.2 "Summer EBT agency"](#); [7 CFR 292.3\(b\)\(1\)\(ii\)](#); [7 CFR 292.3\(c\)](#)]

7. How will Summer EBT operate in the territories?

The U.S. Territories of Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands each operate FNS programs consistent with statutory authorities that allow flexibility in their administration of CN programs. This means that most school age children in these territories are automatically eligible for SEBT. USDA is ready to work one-on-one with the territories, through the FNS Regional Offices, to develop systems and processes that will ensure successful Program operations, utilizing waiver authority, if necessary. Due to a higher cost of living in areas outside of the contiguous United States, the monthly benefit will be adjusted to reflect local costs for the U.S. Territories, as well as Alaska and Hawaii. [[7 CFR 292.18](#); [7 CFR 292.15\(e\)\(2\)](#)]

8. Will eligible children in an ITO's jurisdiction automatically be enrolled in the ITO's Summer EBT Program?

Yes. Children from a Summer EBT-administering ITO's service area who can be enrolled through streamlined certification will automatically be enrolled in the ITO-administered Summer EBT Program. However, children from ITO service areas may opt to participate in the State-operated program and opt out of the ITO-operated program. Because the majority of eligible children will be enrolled through streamlined certification and no action will be required on the part of the household, ITOs would have a significant disadvantage if children in their service areas were automatically enrolled in the State-administered Summer EBT Program. Providing priority consideration to ITO Summer EBT agencies will allow them to serve their communities with

minimal burden while also providing households the choice to opt into the State-administered Program if that is their preference. [[7 CFR 292.12\(d\)](#); [7 CFR 292.9](#)]

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 preceding school year and the start of classes for the next school year, as determined by the Summer EBT agency in each State or ITO and approved by USDA. [[7 CFR 292.2](#)]

10. Will there be appeals, fair hearings and/or overclaim procedures for Summer EBT?

Yes. The procedures for appeals and fair hearings related to Summer EBT eligibility will largely follow the current appeal and fair hearing procedures for the National School Lunch Program and School Breakfast Program (NSLP/SBP). In general, hearing procedures will provide an opportunity for families to appeal an eligibility determination made by the Summer EBT agency and the Summer EBT agency an opportunity to challenge the continued eligibility of the child. FNS is considering how to approach over-issuances to families and will focus on technical assistance for States and ITOs in the near term. The Agency's intent is to first work with States and ITOs to identify systemic weaknesses and develop programmatic solutions. [[7 CFR 292.26](#); [7 CFR 292.27](#)]

11. How will FNS review State and ITO Summer EBT programs?

Consistent with other FNS programs, the Summer EBT Program will be subject to audits and FNS will conduct routine oversight of State agencies operating Summer EBT through periodic Management Evaluations and Financial Management Reviews. FNS understands that Summer EBT agencies will need time to fully establish the program in the initial years. FNS will gather information and input over the next year on Summer EBT and will phase in review procedures over time, as necessary. [[7 CFR 292.24](#)]

12. What should Summer EBT agencies do if schools and/or other agencies refuse to cooperate with Summer EBT implementation?

States, ITOs, and local partners including schools, are critical to the success of Federal nutrition programs and their perseverance and dedication to providing nutrition assistance helped support millions of people across the country during the pandemic. This same level of commitment and collaboration will be critical to the success of the Summer EBT program. FNS understands that standing up a new nutrition assistance program is challenging, and the crosscutting nature of Summer EBT will require new types of collaboration and innovative program design. Since Summer EBT is a permanent program, Summer EBT agencies and local agencies can invest in infrastructure to support efficient implementation.

As the program is implemented, it is important that Summer EBT agencies educate various stakeholders, including schools, on the benefits and purpose of Summer EBT. For schools in particular, it may be helpful to emphasize immediate needs for 2024 implementation and how administrative burden will be reduced for them over time as infrastructure is put in place. Providing benefits to all eligible children in the State or ITO service area is a Program requirement, but will also extend benefits to families and communities that need help in the

summer and aren't effectively served through existing programs. While the first years of Summer EBT may be challenging, FNS is committed to providing technical assistance and flexibility, as needed, to support program implementation.

13. Are the POMs that States submit by February 15 binding documents? What if changes occur after the initial submission?

No. POMs are working documents that should represent the best known information at the time of submission. USDA recognizes that changes will likely occur as States work through implementing the program. Some of these changes will be known prior to FNS approval of the POM and others will occur later in the process. Regardless, any changes to the information in the POM should be promptly submitted by the Summer EBT agency to the FNS regional office for review and approval.

14. [NEW!] How should Summer EBT agencies determine their summer operational period?

Summer EBT regulations ([7 CFR 292.2 "Summer operational period"](#)) require the summer operational period (SOP) to "generally reflect the period between the end of classes during the current school year and the start of classes for the next school year." In States and ITOs where there is a broad range of start and end dates for the instructional year, the SOP should be set to cover as many children as possible while they are on break to ensure they are able to access their benefits when their schools let out and/or apply for benefits until they return to school. In other words, the start of the SOP should align with when the earliest schools are getting out and the end of the period should align with when the latest schools are returning.

15. [NEW!] If a State or ITO already has a school enrollment database within the Education agency that meets the minimum requirements in the regulations, do they have to build a new, separate database for Summer EBT?

No. If a compliant database already exists within the State or ITO, it is not necessary to build a Summer EBT-specific database. It is not a requirement that the database be exclusively used by, or built for, the Summer EBT program, so long as it can provide data to support confirmation of enrollment in an NSLP/SBP participating school and prevention of duplicate participation among children attending NSLP/SBP schools.

Additional information to help Summer EBT agencies meet this requirement can be found in the [Summer EBT NSLP/SBP Enrollment Database Requirements](#) resource. For additional technical information on databases, Code for America and No Kid Hungry have partnered to release a [Summer EBT Database Requirement Guidance document](#).

Eligibility and Certification

16. If a State or ITO opts to administer Summer EBT, do they have to serve all eligible children?

Yes. If a State or ITO administers the Summer EBT Program, it must make benefits available to all eligible children. [\[7 CFR 292.1\(b\)\]](#)

17. Are children who are not enrolled in NSLP/SBP schools eligible for Summer EBT?

It depends. School-age children who are not enrolled in an NSLP/SBP school, including children enrolled in a public or private school that does not participate in the NSLP/SBP and homeschooled children, may be deemed eligible for Summer EBT if they participate in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), Medicaid (in some cases), or another means tested program approved by the Secretary. Children who are not enrolled in NSLP/SBP participating schools cannot establish their Summer EBT eligibility by filling out an application. [[7 CFR 292.6](#)]

18. Who can establish eligibility for Summer EBT with an application?

Children who are enrolled in NSLP/SBP schools can establish eligibility for Summer EBT by completing and submitting an application. This includes children enrolled in special provision schools (Provision 2, Provision 3, or Community Eligibility Provision schools) and children who do not already have an individual eligibility determination from their NSLP/SBP school. For example, a child can submit an application if they become income eligible during the summer or if they did not apply for NSLP benefits but want Summer EBT benefits. Children who are not enrolled in an NSLP/SBP school cannot be certified by application; they can only be enrolled in Summer EBT if they are school-age and participate in an approved assistance program, such as SNAP. [[7 CFR 292.6](#)]

19. What is the age range for Summer EBT eligibility?

Children of any age who are enrolled in NSLP/SBP-participating schools are eligible for Summer EBT if they are also eligible for free or reduced price school meals. This includes children of high school grade or under, including preschool-age children, as well as students who are mentally or physically disabled, as defined by the State, and who are participating in a school program established for the mentally or physically disabled.

Children not enrolled in NSLP/SBP-participating schools who are certified through streamlined certification must be school age. For the purpose of streamlined certification, school-age means the years in which a child is required to attend school, or an equivalent program as defined by State or Tribal law. This is also known as the age requirement for compulsory education. [[7 CFR 292.2 "School aged"; 7 CFR 292.6](#)]

20. What does school-aged mean for Summer EBT?

For Summer EBT, school aged means the years in which a child is *required* to attend school. This is also known as the age range for compulsory education.

Summer EBT is intended for children who are missing out on school meals during the summer, and children of compulsory age is the most accurate proxy for children who are enrolled in school. Children enrolled in NSLP schools who are not within the compulsory age range may still be streamline certified using administrative data (for example, data from school meal applications), meaning that eligible NSLP children will not lose access to Summer EBT based on age. The compulsory age requirement only applies to children who are streamline certified without matching to NSLP records. Regardless of the compulsory age range, Summer EBT agencies have to collect data for all eligible children attending NSLP schools including through

Summer EBT applications, so expanding the compulsory age would not be expected to reduce an agency's time or effort. However, including ages when children are not required to be in school would mean that more children who **don't** attend school and are **not** missing out on meals during the summer would be streamline certified, such as kids who are in year-round childcare. Please note that the school cutoff date does not impact SEBT eligibility for streamlined cert. If a child is categorically eligible and within the age range at any point during the period of eligibility they should get the benefit. If you have specific data challenges, let us know and we can help you troubleshoot. [[7 CFR 292.2 "School aged"; 7 CFR 292.6](#)]

21. Can children enrolled at NSLP/SBP schools who are older or younger than the age of compulsory school attendance participate in Summer EBT?

Yes, children of any age who are enrolled in NSLP/SBP-participating schools are eligible to participate in Summer EBT if they are categorically eligible, or reside in a household with an income level at or below 185% of the Federal Poverty Level and complete an NSLP/SBP application or a Summer EBT application. [[7 CFR 292.5; 7 CFR 292.6](#)]

22. Can States and ITOs set an age threshold for streamlined certification of non-NSLP children that includes children older and/or younger than the State or ITO's age of compulsory school attendance?

No. The compulsory age of school attendance aligns with individual State or ITO requirements for school enrollment. Issuing benefits to all children of compulsory school age who can be streamline certified simplifies the identification of children who are most likely to be enrolled in school and without access to school meals during summer break. However, eligible children younger or older than the compulsory age of attendance who are enrolled in an NSLP/SBP school will still be enrolled in Summer EBT through school-level eligibility data or, if their eligibility for Summer EBT has not already been established, using a Summer EBT application. Children of any age who are enrolled in an NSLP/SBP school and meet eligibility requirements for free and reduced price school meals are eligible to receive Summer EBT. This includes children in pre-kindergarten programs and children older than 18 who are enrolled in the NSLP/SBP school. [[7 CFR 292.2 "School aged"; 7 CFR 292.6](#)]

23. Will all children who attend special provision schools be automatically enrolled in Summer EBT (i.e., be issued benefits without the need to apply)?

No. In order to be eligible for Summer EBT benefits, children must be individually determined to be eligible for free or reduced price school meal benefits during the instructional year immediately preceding the summer operational period or during the summer operational period. Children enrolled in provision schools who are not otherwise identified as Summer EBT-eligible through streamlined certification may apply for Summer EBT benefits using a Summer EBT Application. This is different from Pandemic EBT where all children in special provision schools were eligible for benefits. [[7 CFR 292.6\(c\); 7CFR 292.12\(d\)](#)]

24. Do Summer EBT agencies need to confirm that children on Summer EBT applications are enrolled in NSLP/SBP schools?

Yes. Summer EBT agencies must confirm enrollment in an NSLP/SBP school for all children who are certified for benefits based on a Summer EBT application. To facilitate this, by 2025, Summer EBT agencies will be required to establish and maintain a State- or ITO-wide database of children who are enrolled in NSLP- or SBP-participating schools within the State or ITO service area, as applicable, for the purposes of enrolling eligible children who submit applications for Summer EBT efficiently and with integrity. The database should include, at a minimum, a child's name, date of birth, school or district where they are enrolled, mailing address, their individual free or reduced price eligibility status (as applicable), and any other information needed to match children and prevent duplicate issuances. 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 for the purpose of use or disclosure to provide other social service benefits to eligible children. FNS will provide technical assistance to Summer EBT agencies in establishing the databases. [[7 CFR 292.12\(c\)](#); [7 CFR 292.12\(e\)](#)]

25. When should children on Summer EBT applications be checked against the NSLP-enrollment database in order to confirm eligibility?

In order to be eligible for Summer EBT, NSLP/SBP-participating children must be enrolled in the school at the time of application approval (i.e., certification). Therefore, the enrollment check should occur at the time of application. Once eligibility is established, the child is eligible for the entire Summer EBT period of eligibility. [[7 CFR 292.6](#)]

26. Do children in special provision schools need current individual eligibility determinations to be eligible for Summer EBT?

Yes. The eligibility determinations must be from the instructional year immediately preceding the summer operational period. This means lists of identified students in CEP schools or lists of free/reduced price students from Provision 2 or Provision 3 base years that are used for claiming meals, but are from years prior to the immediately preceding instructional year may *not* be used for Summer EBT eligibility. For example, if an LEA is operating CEP based on a list of identified students from School Year 2022-2023, that list may not be used to establish eligibility for Summer EBT in 2024 since the eligibility data is not from the immediately preceding instructional year.

To be eligible for Summer EBT benefits, children in CEP schools and non-base year Provision 2 and Provision 3 schools will need to be categorically eligible or complete a Summer EBT application during the immediately preceding instructional year. LEAs currently operating CEP, or Provision 2 or Provision 3 in non-base years, are required to conduct direct certification with SNAP at least once annually per 7 CFR 245.6(b)(1)(v). Children identified in these annual direct certification matches are automatically eligible for Summer EBT. FNS encourages States and LEAs to continue their efforts to identify all students who are eligible for free and reduced price meals without an application. Children who are not categorically eligible in special provision schools must complete a Summer EBT application and reside in a household that is at or below the NSLP income threshold for reduced price meals (185% FPL) in the instructional year

immediately preceding the summer operational period or during the summer operational period to be certified for Summer EBT. [[7 CFR 292.6](#); [7 CFR 292.7](#)]

27. What does it mean to have a statewide application requirement?

The statute requires States and ITOs to make an application available for eligible children to apply who are not certified through streamlined certification. This includes all aspects of application processing and verification. USDA recognizes that Summer EBT agencies may not have the systems and processes needed to process Summer EBT applications in time for 2024 operations. In 2024 only, Summer EBT agencies may delegate application processing to LEAs. However, if a Summer EBT agency delegates application processing to LEAs, then it should cover new administrative costs incurred by the LEAs with respect to Summer EBT application processing. To be fully reimbursed by the Summer EBT State agency, the administrative costs incurred by the LEA must be new activities related to processing Summer EBT applications. For Summer EBT agencies that plan to use alternative income forms to certify children for Summer EBT in 2024, many of these forms have already been accepted and processed by LEAs. Summer EBT agencies are only required to reimburse for expenses directly related to the activities and processes required to implement the Summer EBT program. [[7 CFR 292.13](#)]

28. Can the Summer EBT application be used to establish eligibility for NSLP/SBP?

Summer EBT applications that meet the minimum standards for NSLP/SBP applications, including the last four digits of the SSN, may also be used to establish eligibility for NSLP/SBP. Application requirements for NSLP/SBP applications are found at [7 CFR 245.6](#).

29. Can the NSLP/SBP meal application be used to establish eligibility for Summer EBT?

Yes. NSLP/SBP applications can be used to establish eligibility for Summer EBT because they meet the minimum standards for Summer EBT applications. [[7 CFR 292.13\(i\)](#)]

30. Does the Summer EBT application need to ask for the last four digits of a Social Security Number (SSN)?

Summer EBT applications may, but are not required to, include a field to collect the last four digits of the SSN for the adult signing the application. However, eligibility must not be contingent on the applicant providing the last four digits of the SSN. In other words, if the Summer EBT application contains an SSN field, it must clearly be labeled as optional; if the applicant leaves the SSN field blank, the application must still be processed if it is otherwise complete. [[7 CFR 292.13\(i\)](#)]

31. Can applications that are collected and processed at the State or ITO level be used for both Summer EBT and NSLP/SBP?

Yes. USDA recognizes that there are administrative benefits to having one application that can be used for both Summer EBT and the school meal programs, and that many Summer EBT agencies will choose to collect and process those applications at the State or ITO level. This is acceptable for both programs, but the application must meet the minimum requirements of both programs (7 CFR 245.6(a), 7 CFR 292.13). It also must clearly communicate to families that are only applying for Summer EBT, that the SSN field is not required. Regardless of who is

conducting the certification process, responsibility for the accuracy of the eligibility determination lies with the local educational agency (LEA) for the NSLP/SBP, and with the State or ITO for Summer EBT. [[7 CFR 292.12\(b\)](#)]. Please note that in the context of CEP schools, applications cannot be used for NSLP and SBP eligibility.

32. Can Summer EBT agencies delegate the collection and processing of Summer EBT applications to Local Educational Agencies (LEAs)?

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 all new costs associated with processing 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.

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. [[7 CFR 292.13\(q\)](#); [7 CFR 292.13\(b\)](#)]

33. If LEAs collect and process applications that are used for Summer EBT eligibility and they participate in CEP, are they violating CEP program regulations?

No. The NSLP and SBP regulations at 7 CFR 245.9(f)(4)(iv) that prohibit CEP schools from collecting free and reduced price household applications do not apply to LEA activity in processing Summer EBT applications. This is because LEAs that have been delegated or contracted to process Summer EBT applications by the Summer EBT agency are not developing, conducting, or funding this effort under the NSLP or SBP. In these cases, it must be clearly communicated to families of children attending a CEP school that they will receive free school meals even if they do not submit an application.

34. What are "alternative income applications" and can they be used to establish eligibility for Summer EBT?

"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. These applications are familiar to households and, in many cases, collect enough information to determine whether the household is at or below the NSLP/SBP income eligibility threshold.

Alternative applications that meet the minimum Summer EBT requirements at [7 CFR 292.13](#) are considered Summer EBT applications and can therefore be used to establish eligibility for Summer EBT.

Alternative income applications in their current form may be used to establish Summer EBT eligibility only in 2024 provided that the forms collect enough information to determine program eligibility (if the households income is at or below 185% of the Federal poverty level). [[7 CFR 292.13\(q\)](#)]

35. How long do Summer EBT agencies need to accept applications? Can there be a submission deadline/cutoff?

Households must have the opportunity to establish eligibility for Summer EBT at any point between the start of the immediately preceding school year and the last day of the summer operational period, which will generally encompass more than an entire calendar year (e.g., July 2023 - August 2024). Therefore, Summer EBT agencies must accept and process applications throughout the year. However, Summer EBT agencies are permitted to *encourage* applications to be submitted before the start of the summer operational period. For example, in communications to households, Summer EBT agencies would be permitted to say, "In order to receive Summer EBT benefits prior to the start of summer, please submit your application no later than March 1st." [[7 CFR 292.13\(e\)](#)]

36. What happens when USDA updates the income eligibility guidelines (IEGs) on July 1st? Must Summer EBT agencies change their Summer EBT applications mid-summer?

Summer EBT agencies do not need to re-process applications that have already been approved or reprint and distribute applications that have the updated IEGs printed in the instructions. However, all Summer EBT applications submitted on or after July 1st must be evaluated using the income eligibility guidelines that are in effect when the application is submitted. Therefore, if applications are being evaluated by an automated system, that system would need to be updated or programmed to change to the new guidelines mid-summer. For more information on income eligibility guidelines, please see [Income Eligibility Guidelines | Food and Nutrition Service \(usda.gov\)](#). [[7 CFR 292.2 "Income eligibility guidelines"](#); [7 CFR 292.5\(b\)](#)]

37. Are Summer EBT agencies permitted to use an online or mobile application, and can electronic signatures be accepted?

Yes. Online or mobile applications are allowed, but paper versions must also be made available. Electronic signatures are permitted. The method and form of the electronic signature must constitute a legal signature under State and local laws. [[7 CFR 292.13\(h\)](#)]

38. Do households need to provide documentation of eligibility at the time of application in order to be certified for Summer EBT benefits?

No. The Summer EBT application will include a self-attestation statement and must be signed by an adult member of the household, but Summer EBT agencies are prohibited from requiring income documentation at the time of application. If the application is selected for verification, the household must then provide proof of eligibility. More information about verification will be included in the IFR, including acceptable sources of documentation. [[7 CFR 292.12\(e\)\(1\)](#); [7 CFR 292.12\(e\)\(4\)](#)]

39. Is verification required for all Summer EBT applications?

No. 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. In 2025 and beyond, the verification process will more closely align with the NSLP/SBP approach to verification than the SNAP process. In other words, verification will be conducted for a sample of Summer EBT applications after the initial eligibility determination of a self-attested income application is made. [[7 CFR 292.14](#)]

40. What is the difference between a Summer EBT application, an NSLP/SBP application and an alternative income form. What program(s) can each be used for, and what are the verification requirements associated with each?

The table below summarizes the key differences among the types of applications. However, please also note that:

- Summer EBT applications and NSLP/SBP applications have many of the same requirements since the eligibility standards for both programs are the same. One difference is that Summer EBT applications may, but are not required to, include a field to collect the last four digits of the SSN for the adult signing the application, whereas NSLP/SBP applications must include space to provide the last-four digits of the SSN (or an indication of “none”).
- Summer EBT applications must have an attestation statement immediately above the space for a signature that includes language that the applicant is not already receiving Summer EBT benefits in another State or ITO. The other requirements for this attestation statement align with the NSLP requirements and can be found at [7 CFR 292.13\(j\)](#).
- The verification requirements that apply are dependent on the type of application and the type of school in which a student is enrolled.

These guidelines apply regardless of the timing of submission, how the application is labeled/branded (i.e., what it says at the top), and the program(s) in which the *household* intends to participate. [[7 CFR 292.6](#); [7 CFR 292.2 “Special provision school”](#); [7 CFR 292.12](#); [7 CFR 292.13](#)]

Application type	In what type of school is the student enrolled?	Does the application meet the minimum requirements for the NSLP/SBP (i.e., can it be used to establish eligibility for NSLP/SBP)?	Does the application meet the minimum requirements for Summer EBT (i.e., can it be used to establish eligibility for Summer EBT)?	Verification requirement
NSLP	Regular counting & claiming (or Provision 2/3 schools in a base year)	Yes	Yes ¹	NSLP verification procedures
Summer EBT	Regular counting & claiming (or Provision 2/3 schools in a base year)	No	Yes	Summer EBT verification procedures

Summer EBT ²	CEP or Provision 2/3 in non-base years	n/a	Yes	Summer EBT verification procedures
Alternative income form	CEP or Provision 2/3 in non-base years	n/a	Yes	Summer EBT verification procedures
Alternative income form ³	CEP or Provision 2/3 in non-base years	n/a	No	n/a

¹Children that were approved for NSLP through a NSLP application during the immediately preceding school year will be streamline certified for Summer EBT, and should not need to submit a separate Summer EBT application.

²Administrative costs associated with the processing of these applications are only the responsibility of the Summer EBT agency if the LEA is *only* collecting this information for the purposes of Summer EBT.

³In 2024, alternative applications would be considered Summer EBT applications as they can be used to establish eligibility even if they do not meet the minimum requirements for 2025 and beyond.

Lastly, in 2024, alternative applications that were collected for purposes other than Summer EBT are considered Summer EBT applications, but are not subject to verification. Alternative applications that are collected for the purposes of Summer EBT are considered Summer EBT applications and *are* subject to Summer EBT verification requirements. In 2025 and beyond, alternative applications that meet the minimum Summer EBT requirements will be considered Summer EBT applications and will therefore be subject to Summer EBT verification procedures. [[7 CFR 292.14](#)]

41. What is verification for cause?

Verification for cause is a process through which questionable applications are verified on a case-by-case basis. Applications selected for verification for cause could include those with conflicting or inconsistent information. For example, if a household submits two separate applications with different information, a Summer EBT agency may choose to verify that application for cause on the basis that the household submitted inconsistent or conflicting information. Verification for cause for Summer EBT applications mirrors the process for school meals. Verification for cause does not need to happen prior to certification and can happen at any time during the eligibility period.

The guidelines established by SNAP agencies regarding how to identify a questionable application may or may not apply to Summer EBT applications since the application requirements for Summer EBT are different from the application requirements for SNAP. [[7 CFR 292.14\(a\)\(1\)](#)]

42. Can the Summer EBT agency provide Summer EBT benefits to all children in CEP schools or only to directly certified children in CEP schools in the first years of Program implementation?

No. A Summer EBT agency must provide Summer EBT benefits to all children who meet the eligibility criteria, not just a subset. Children in special provision schools who do not have an individual eligibility determination from the instructional year preceding the summer operational period must be provided with an opportunity to apply for Summer EBT benefits using a Summer EBT application. [[7 CFR 292.1\(b\)](#); [7 CFR 292.6](#)]

43. What programs can be used to automatically enroll eligible children in Summer EBT through streamlined certification without matching against school enrollment?

SNAP must be used to automatically enroll children in Summer EBT.

Data from FDPIR, TANF, and records of children who are considered foster, homeless, migrant, runaway or Head Start must be used if the data is available at the State level and is currently used to directly certify kids for the NSLP/SBP.

Medicaid data *may* be used to automatically enroll children in Summer EBT, where applicable. – See the Q&A, “*If a Summer EBT Agency uses Medicaid to directly certify children for free or reduced price school meals, can Medicaid also be used to establish Summer EBT eligibility?*” for more information.

All programs/data sources that Summer EBT agencies intend to use for streamlined certification must be included in the POM submission for USDA approval. [[7 CFR 292.12\(d\)\(1\)](#)]

44. [NEW!] Program regulations allow Summer EBT agencies to enroll eligible children through streamlined certification who are members of a household receiving assistance under other means-tested programs, as approved by the Secretary. What types of means-tested programs can be used for streamlined certification and how should they be requested?

FNS may approve Summer EBT agencies to use streamlined certification to enroll eligible children who are members of a household receiving assistance under means-tested programs that are not used for direct certification in the school meal programs (7 CFR 292.12(d)(2)). For example, a Summer EBT agency could propose and be approved to conduct streamlined certification to enroll eligible children participating in Medicaid, or means-tested State, Tribal, or local programs like extensions of SNAP or TANF that follow SNAP/TANF rules but are administered and funded by the State or Tribe. To be approvable, the Summer EBT agency must confirm that income and eligibility rules for any additional program proposed align with Summer EBT eligibility rules.

Summer EBT eligibility is based on the eligibility standards for the National School Lunch Program and the School Breakfast Program (7 CFR 292.5). Eligible children include those who are income eligible for free or reduced-price school meals based on the Income Eligibility Guidelines (guidelines), which are annually adjusted and published in the Federal Register. The income eligibility guidelines for 2024-2025 can be found here. As reflected in the guidelines, only children whose household income is at or below 185% of the Federal poverty limit at the time of application are eligible for Summer EBT. If the Summer EBT agency wishes to streamline certify children with data from a program with a higher income limit, the agency must be able to identify which children participating in that program are at or below 185% of poverty using the definition of income for Child Nutrition Programs.

“Income” for purposes of the Child Nutrition Programs:

- Must be determined before any deductions such as income taxes, Social Security taxes, insurance premiums, charitable contributions, and bonds.

- Includes the following: (1) monetary compensation for services, including wages, salary, commissions or fees; (2) net income from nonfarm self-employment; (3) net income from farm self-employment; (4) Social Security; (5) dividends or interest on savings or bonds or income from estates or trusts; (6) net rental income; (7) public assistance or welfare payments; (8) unemployment compensation; (9) government civilian employee or military retirement, or pensions or veterans payments; (10) private pensions or annuities; (11) alimony or child support payments; (12) regular contributions from persons not living in the household; (13) net royalties; and (14) other cash income. Other cash income would include cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources that would be available to pay the price of a child's meal.
- Does not include any income or benefits received under any federal programs that are excluded from consideration as income by any statutory provision (such as SNAP benefits).
- Does not include the value of meals, milk, or EBT benefits provided to children (42 USC 1760(e) and 1780(b)).

A Summer EBT agency seeking to use additional programs to enroll eligible children using streamlined certification should include this as a proposal in their POM. As part of the proposal, the Summer EBT agency should thoroughly describe the additional program and how eligibility is determined, affirm that its income standards align with the NSLP/SBP income standards, as described above, and describe what measures are in place to promote integrity of eligibility determinations, such as requiring documentation at the time of application or verification of income following approval. Documentation, such as a website that describes program requirements, must be provided.

45. Is a child who is enrolled in a Head Start program that participates in the NSLP and/or SBP eligible for Summer EBT?

Yes. If a child is enrolled in a Head Start program that participates in NSLP and/or SBP, the child is eligible for Summer EBT regardless of whether their age falls within the State or ITO compulsory age range. The child is categorically eligible and has access to NSLP/SBP meals, and therefore should be streamline certified for Summer EBT with data from the school. [[7 CFR 292.2](#), “Categorically eligible”; [7 CFR 292.6](#); [7 CFR 292.12\(d\)](#)]

46. For children who are not enrolled in NSLP/SBP-participating schools, but can be streamline certified through participation in SNAP, TANF, FDPIR, or Medicaid (as applicable), what is the timing of program participation to be eligible for Summer EBT?

In order to be eligible for Summer EBT, non-NSLP/SBP children must be school age at the time of participation in the eligible program, *and* have participated in that program at some point during the most recent school year or during the summer. This is consistent with eligibility in the NSLP/SBP which, once established, is effective for the entire school year. [[7 CFR 292.6](#); [7 CFR 292.7](#); [7 CFR 292.12\(d\)](#)]

47. If a State Child Nutrition Agency uses Medicaid to directly certify children for free or reduced price school meals, can Medicaid also be used to establish Summer EBT eligibility?

Yes. If a Summer EBT Agency is participating in the Medicaid demonstration project to directly certify eligible children through Medicaid for free or reduced price school meals, they can also use Medicaid to automatically enroll school-age children who meet the income requirements for Summer EBT through the streamlined certification process. Streamlined certification with Medicaid does not require a match/verification against a school enrollment list prior to issuance. [[7 CFR 292.12\(d\)\(2\)](#)]

48. In States that have established their own higher income thresholds for eligibility for free school meals, will all students who receive free meals qualify for Summer EBT? For example, a State where students below 200% of the federal poverty guidelines are provided meals at no charge.

No. Income eligibility for Summer EBT is based on the Federal NSLP/SBP eligibility thresholds. Therefore, only children in households at or below 185% of the Federal poverty guidelines are eligible for Summer EBT even if the State in which they live provides meals at no charge to children in households above 185% of the poverty threshold. [[7 CFR 292.2 “Income eligibility guidelines”](#); [7 CFR 292.5\(a\)](#)]

49. Are children who attend year-round schools eligible for Summer EBT if they meet all other eligibility requirements?

Yes. The statute provides that children attending year-round schools operating the NSLP/SBP may be eligible for Summer EBT. Summer EBT agencies must describe their plan to serve children in schools operating on a continuous calendar as part of their POM. [[7 CFR 292.8\(e\)](#); [7 CFR 292.15\(b\)](#)]

50. Can an eligible child participate in Summer EBT and another FNS program at the same time?

Yes. Participation in Summer EBT does not preclude a child from participating in other nutrition assistance programs. For example, participation in the Summer Food Service Program (SFSP), SNAP, WIC, or the Food Distribution Program on Indian Reservations (FDPIR) does not prevent a child from receiving Summer EBT benefits. These programs are meant to be complementary. The complementary nature of these nutrition assistance options is the foundation of their great potential to benefit children across the nation. They are intended to be used collectively to provide a nutrition safety net, not just during the summer but all year round.

51. Is there any Federal guidance on how to determine the head of household or address custody disputes?

No. This is an area of discretion for Summer EBT agencies.

52. Can a household request reconsideration if a child was not streamlined certified or was determined ineligible through a Summer EBT application?

Yes. Households should utilize the Summer EBT agency's customer service number as a first line of inquiry in these cases. If the agency is not able to answer their question or resolve the issue, the household should use the appeals process as directed by the Summer EBT agency. [[7 CFR 292.12\(g\)](#); [7 CFR 292.12\(h\)](#); [7 CFR 292.26](#)]

53. Are all children in the household eligible for Summer EBT? For instance, an income-eligible household submits an application with two children; one is enrolled in an NSLP-participating school, and one attends a private pre-school that does not participate in the NSLP/SBP. Is the pre-schooler eligible for Summer EBT?

No. Every child needs to meet the eligibility criteria individually in order to receive Summer EBT benefits. [[7 CFR 292.6](#)]

54. Are children eligible for Summer EBT benefits if the household applies for a program that is used for streamlined certification (e.g., SNAP) before the end of the summer operational period, but that application is not certified by the program agency until after the summer operational period ends?

Yes. Eligibility for Summer EBT benefits is based on the date of application (for streamline certification-eligible programs), rather than the date of certification or approval. However, the date of program application must be within the period of eligibility, which goes from July 1 of the prior year through the last day of the summer operational period, as defined by the Summer EBT agency in the Plan for Operations and Management (POM). [[7 CFR 292.6](#); [7 CFR 292.7\(a\)](#); [7 CFR 292.12\(d\)](#)]

55. [NEW!] Within the definition of a household at 292.2, what is an economic unit?

Per 7 CFR 292.2 "Household," household means a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit. An economic unit means that the individuals share income and expenses. More information regarding the definition of an economic unit for Summer EBT and the NSLP/SBP can be found in the Eligibility Manual for School Meals.

56. [NEW!] Are children who are members of a household that is receiving "zero benefits" from SNAP categorically eligible for Summer EBT based on SNAP participation?

No. Children who are members of a SNAP household that receives "zero benefits" are not eligible for Summer EBT based on SNAP participation. However, these children may be eligible for Summer EBT if they are eligible for free or reduced price school meals through a household application or through information from an appropriate source that establishes categorical eligibility (e.g., TANF).

State agencies must ensure that SNAP matches do not identify children who are members of SNAP households that receive "zero benefits" as categorically eligible for Summer EBT or free

school meals. More information regarding zero SNAP benefit households and NSLP/SBP can be found in the [Eligibility Manual for School Meals](#).

57. [NEW!] Do children who attend NSLP/SBP schools that don't collect applications annually need to submit a Summer EBT application in order to be approved for Summer EBT benefits?

Yes. Individual eligibility determinations must be based on data/information that aligns with the current Program year. All children who attend NSLP/SBP schools that don't collect applications annually must have a current eligibility determination. In other words, base year eligibility determinations from prior years cannot be used to enroll children for Summer EBT.

58. [NEW!] If a household submits a SNAP application during the summer operational period but the application is not processed until after the end of the SOP, are school-age children in that household eligible for Summer EBT?

Yes. Summer EBT agencies must use the date a SNAP application was submitted, not the date it was processed, when determining if a child in a household was eligible for Summer EBT during the period to establish eligibility.

59. [NEW!] For applications that are submitted between July 1st and the end of the summer operational period, will the Summer EBT agency have to verify enrollment of the child in an NSLP school twice (e.g., once for the 2024 program year and once for the 2025 program year)?

Yes. Children on applications that are submitted during the window of overlapping periods of eligibility (i.e., July 1 through the end of the SOP) must have their enrollment in the immediately prior school year confirmed at the time of application to establish eligibility for the current summer's benefit and checked again against enrollment for the new school year to establish eligibility for the following summer's benefit. The household or income information on the application does not need to be updated or recertified, but the child's enrollment in a qualifying school during each period of eligibility must be confirmed prior to issuing benefits for that program year.

For example, a Summer EBT agency has an SOP that ends August 15, 2024. A Summer EBT application is submitted on August 1, 2024, and the child is determined to be income eligible based on the application. Prior to issuing the 2024 benefit, the Summer EBT agency must confirm enrollment in an NSLP/SBP-participating school during the 2023-2024 school year. Prior to issuing the 2025 benefit, the Summer EBT agency must confirm enrollment in an NSLP/SBP-participating school during the 2024-2025 school year.

60. [NEW!] Can mailing address, school name, or date of birth be required fields on a Summer EBT application? In other words, can a household be prevented from submitting an application if they do not provide one of these fields?

Per regulations at 7 CFR 292.12, an application is considered complete and must be processed if it contains the name of the household members, the amount, source, and frequency of income for each household member; and a signature. However, FNS understands that additional

information may be needed by the Summer EBT agency to confirm eligibility, deduplicate records, and issue benefits. Options to obtain this information that are consistent with the regulations include:

- Valid mailing address – Summer EBT agencies may require a response to a question about mailing addresses if they provide an option for households to complete the question without providing an address, e.g., including a check box or providing another way for families to indicate that they do not have a mailing address. In these cases, the Summer EBT agency may provide an additional question or information about how these families can access their benefits, such as picking up their cards at an alternative location.
- Child's school – Summer EBT agencies may require the school field to be completed so long as families are provided the option to select or provide a response like “I don't know” or “My child's school is not listed.” Adding options like “My child does not attend school” or “Homeschooled” to the drop-down list is recommended because some parents may apply for children who don't attend an NSLP school because they don't understand the eligibility requirements or application instructions.
- Date of birth – A Summer EBT agency may add an “I don't know” field to the Summer EBT application and then require *either* the DOB field to be completed *or* the “I don't know” check-box to be checked.

It is important that families who do not know or have all of the information the agency needs to issue a Summer EBT benefit are still able to submit an application. FNS understands that these cases require additional work and follow-up on the part of the Summer EBT agency to obtain the information needed to issue benefits. It is important that these families are provided a reasonable opportunity to access Summer EBT benefits.

Additional resources and information to help Summer EBT agencies with outreach, communication, and implementation can be found in the [Summer EBT Implementation Toolkit](#) and the [Summer EBT Outreach Toolkit](#).

61. [NEW!] When should Summer EBT agencies send eligibility notices?

For children who apply using a Summer EBT application, Summer EBT agencies must notify (or place notification in the mail) the eligible household of a child's approved status within 15 operational days of receipt of a complete application. This may be included in the mailing containing the EBT card or another communication informing the household about the issuance or use of benefits [7 CFR 292.12(f)(1)].

For children who apply in the window when two periods of eligibility overlap, an approval notice should be sent within 15 days informing the applicant of their eligibility determination for the current program year. When enrollment in the next school year can be confirmed, a second notice should be sent to the family that they are approved for benefits for the upcoming program year, but there are not specific requirements around the timing of this notice.

For children who are streamline certified, their households must be notified, in writing, that their children are eligible for Summer EBT and that no application is required. The Summer EBT agency has the discretion to determine when to issue these notifications [7 CFR 292.12(f)(2)].

62. [NEW!] Is direct verification required for households selected for verification?

Yes. In order to reduce administrative and household burden associated with verification, Summer EBT agencies must conduct direct verification prior to contacting households that are selected as part of a random verification sample or for verification for cause.

Direct verification is the process of verifying household income or categorical eligibility by matching against data sources or other records. Summer EBT agencies must conduct direct verification with the programs used for streamlined certification and may also use other sources of administrative data such as State Income and Eligibility Verification Systems (IEVS) data, tax records, wage databases, or other sources available to the Summer EBT agency, if included and approved through the POM process.

63. [NEW!] When a Summer EBT application is selected for verification, what time period does the documentation from the household need to represent?

The income documentation provided only needs to indicate eligibility for participation in the program at a single point in time during the period of eligibility, not that the child was income eligible or categorically eligible at the time of application or verification. Per 7 CFR 292.14(f)(4), households selected and notified of their selection for verification must provide documentation of income. The documentation must indicate the source, amount, and frequency of all household income and may indicate eligibility at any point during the period of eligibility.

64. [NEW!] Can the Summer EBT agency verify for cause an applicant's eligibility after they have been issued benefits?

Yes. In most cases, verification for cause occurs when the application is initially processed. However, an application can be verified for cause at any time if the Summer EBT agency receives information indicating that verification is warranted. If a Summer EBT agency is alerted to a questionable application after initial approval or issuance of benefits, no further benefits should be issued until verification is complete. In this case, regulations do not specify a time period in which verification must be completed, but minimum follow-up requirements at 7 CFR 292.14(f)(7) must still be followed.

65. [NEW!] If an application that was submitted during the period of eligibility overlap (between July 1st and the end of the SOP) is selected for verification for cause, should that application be included in the random verification sample pool for the following year's 3% verification sample.

No. The same application should not be verified twice, and therefore, if an application is verified for cause, then it should not be included in the sample pool for the random 3% sample.

For example, a Summer EBT application is submitted on July 15, 2024, which is in the window during which the child may potentially receive two years of benefits for one application because two periods of eligibility overlap. If it is selected for cause at the time of application, and it is

confirmed that the child(ren) *is* eligible for benefits, that application should *not* be included in the sample pool for the random 3% verification sample for the 2025 program year. However, the Summer EBT agency must still confirm enrollment at an NSLP school for both program years.

EBT Benefits

66. 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 Supplemental Nutrition Program for Women, Infants and Children (WIC) cards, as applicable, 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 or WIC-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; administrative costs must also be appropriately allocated. [[7 CFR 292.8\(e\)\(10\)](#); [7 CFR 292.15\(c\)\(2\)\(i\)\(A\)](#); [7 CFR 292.20\(b\)](#)]

67. If Summer EBT benefits are co-loaded with SNAP benefits, should Summer EBT benefits be used before SNAP benefits?

Yes. Summer EBT benefits must be used before SNAP benefits because Summer EBT has a shorter expungement timeframe. [[7 CFR 292.15\(j\)](#)]

68. How is opt-out supposed to be operationalized for SNAP households whose Summer EBT benefits are loaded onto SNAP cards?

While this situation is likely to be rare, one approach is to set up a phone number that participants can call to have those benefits removed from their SNAP cards, if that is what they want. [[7 CFR 292.8\(e\)\(11\)\(iii\)](#); [7 CFR 292.12\(b\)\(3\)](#)]

69. When should States and ITOs issue benefits?

Each State and ITO must determine a summer operational period or periods for the purpose of issuing Summer EBT benefits, which will be included in their approved POM. Summer EBT agencies may adopt a standard summer period that is generally reflective of summer break schedules in the State or ITO. Requirements for the timing of benefit issuance depend on when a child is certified as eligible for Summer EBT.

- 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 too late for their benefits to be issued on the planned issuance schedule (e.g., 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. Issuance may occur after the end of the summer operational period for applications that are submitted at the end of the summer.

Summer EBT benefits have a shorter period during which they can be spent compared to SNAP benefits, and Summer EBT applications do not require up-front income verification, which enables faster processing. However, USDA recognizes a Summer EBT agency's ability to issue benefits timely in 2024 may be hindered by a variety of factors including the time needed to establish the program, late applications from families who did not realize they needed to apply, and processor backlogs. For 2024, USDA will prioritize technical assistance and support in situations where a State or ITO is not able to issue all benefits on their approved schedule.

Additionally, Summer EBT agencies may opt to provide households with their benefits in one issuance, in accordance with the required timelines, or in 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. [[7 CFR 292.15\(c\)](#)]

70. What is the summer operational period and what does it mean for when Summer EBT benefits can be issued and used?

Each Summer EBT agency will annually establish a summer operational period, which is the period between the end of classes during the current school year and the start of classes for the next school year (i.e., the period when children will not have access to school meals). The summer operational period does not need to align with calendar months, nor does it need to be 3 full months in duration (please note that participants will receive \$120 for the summer operational period that approximately reflects 3 calendar months). The Summer EBT agency should review school calendars within the State or ITO and select start and end dates that will allow participants 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 children are still in school, and does not include days when some children are on break. The objective is to select dates that are generally reflective of school calendars in the State or ITO. [[7 CFR 292.2](#); [7 CFR 292.7](#); [7 CFR 292.15](#)]

71. [REVISED] How can Summer EBT agencies ensure that benefits will be available to spend between 7 and 14 days before the start of the summer operational period?

The operative component of this requirement is ensuring that the benefits are “available to spend” during that 7-14 day window. Cards can be mailed in advance of that time, and benefits can even be loaded into the accounts beforehand. However, the benefits should only be made available to the households for spending in the 7-14 days before the summer operational period begins. It is at this time, when benefits are made available, that they are considered issued. For example, a Summer EBT agency loads benefits on accounts and mails Summer EBT cards between May 10 and May 15. The start of the summer operational period is June 10. The Summer EBT agency issues the benefits by making them available to spend June 3, which is 7-14 days before the start of the summer operational period. In this example, the benefits are considered to be ‘issued’ on June 3, regardless of when benefits were loaded on accounts or cards were placed in the mail. June 3 is also when the clock would start ticking on the 122-day expungement timeline. To minimize confusion when cards arrive before benefits are issued, it is very important that Summer EBT agencies clearly communicate to households when the benefits will be available to spend.

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 2025. Therefore, USDA will work with States and ITOs through the POM process to develop realistic and reasonable issuance schedules for 2025. [7 CFR 292.15(c)]

72. If a State or ITO is not able to issue benefits during the summer operational period in 2024, can the State or ITO 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 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. 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. Therefore, USDA will work with States and ITOs to develop realistic and reasonable issuance schedules for 2024.

73. 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. [7 CFR 292.15(e)]

74. [REVISED] When must Summer EBT benefits be expunged?

The statute requires that expungement cannot be longer than 4 months. For the purpose of Summer EBT, expungement means the removal of Summer-EBT benefits from the EBT account to which they were issued, typically by an EBT processor on behalf of a Summer EBT agency. FNS 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. Summer EBT agencies must provide notice to the household that benefits in their EBT account are approaching expungement not less than 30 days before benefit expungement is scheduled to begin. [7 CFR 292.15(h)]

75. [REVISED] Do Summer EBT agencies have to ‘reset’ the expungement timeline for benefits that are not received by the eligible household before the benefit issuance date?

No. Summer EBT benefits expunge 122 days after issuance. The 122-day count begins the day after the benefits are issued, i.e., available 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 the first day of June, the benefits are considered to be ‘issued’ on June 1. Benefits issued on June 1, regardless of when they were loaded on accounts or cards were mailed, will expunge 122 days after June 1. The Summer EBT agency may not restart the 122-day expungement timeline when the participant reports that the card was physically received.

76. Will Summer EBT agencies be required to follow the Advance Planning Document (APD) process used in SNAP and WIC?

Yes, Summer EBT agencies are required to adhere to the APD process for EBT systems development. Summer EBT eligibility systems that are part of existing SNAP or WIC eligibility systems are also subject to the ADP process. FNS stands ready to work with Summer EBT agencies that are making system modifications that require the APD process to facilitate timely review and approval. [[7 CFR 292.11\(a\)](#)]

77. [REVISED] Are Summer EBT agencies required to replace benefits when food purchased with those Summer EBT benefits is destroyed due to disaster or household misfortune?

Yes, per [7 CFR 292.15\(g\)\(5\)](#), Summer EBT agencies must replace benefits when food purchased with those benefits was destroyed due to a disaster or household misfortune. The Summer EBT agency should collect and review household affidavits consistent with their procedures for replacing SNAP benefits in response to a disaster or household misfortune. Summer EBT agencies should replace the lesser of the amount lost (as estimated by the household) or an amount equal to three months of benefits. The Summer EBT agency has the discretion to request additional evidence from a household to substantiate a questionable request.

78. Will electronically stolen Summer EBT benefits issued for Summer 2024 be replaced by USDA?

No. Summer EBT benefits that are lost to skimming, cloning, or similar fraudulent methods will not be replaced by USDA for Summer 2024. Summer EBT Agencies may replace these benefits with non-Federal funds, but it is not a requirement.

79. Will the \$40 monthly benefit be adjusted annually with inflation?

Yes. The statute provides that the Summer EBT benefit amount will be adjusted annually, starting in 2025, based on changes to the cost of the [Thrifty Food Plan](#), which is a plan developed by USDA to estimate the cost of a low-cost, healthy diet. [[7 CFR 292.15\(e\)\(3\)](#)]

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

Participants who receive benefits through a State-administered Program 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. Participants who receive benefits through an ITO-administered Program will be able to purchase supplemental foods, as determined by the administering ITO, at any WIC-authorized retailer. Supplemental foods are foods that 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. An ITO Summer EBT agency may consider supplemental foods authorized in its WIC Program to also be eligible for redemption with Summer EBT benefits, with the exception of infant formula and infant foods. 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. [[7 CFR 292.16\(i\)\(1\)](#)]

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

No. EBT contracts are between the State or ITO 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 and WIC 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. [[7 CFR 292.11](#)]

82. Will FNS provide cost estimates to assist States and ITOs in developing budget requests for EBT development costs?

No. FNS does not have administrative cost data that is generally applicable to Summer EBT implementation at the State or ITO level. FNS recommends States use their Pandemic EBT administrative funding levels as a starting point when considering administrative funding needs for Summer EBT. ITOs have not operated PEBT and so WIC costs for development and costs per case month (CPCM) may be more useful when developing Summer EBT budget and project cost estimates. FNS recognizes Summer EBT agencies may need an initial increment of funding in FY 2024 to address immediate expenses. Information on initial administrative funding allocations for States and ITOs can also be found in Memorandum [SEBT 01-2024: Summer EBT Administrative Funding Process for FY 2024](#), released October 18, 2023.

83. Do States and ITOs 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 do not want to participate to destroy their Summer EBT cards. [[7 CFR 292.12\(f\)\(3\)](#)]

84. What are the requirements for Summer EBT retailers or vendors?

In general, retailer/vendor requirements for Summer EBT are consistent with SNAP or WIC requirements, respectively. Summer EBT agencies should train all enrolled retailers/vendors to recognize and accept Summer EBT benefits. [[7 CFR 292.16\(g\)](#); [7 CFR 292.19\(c\)](#)]

85. 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 States or ITOs operating Summer EBT. However, Summer EBT agencies are ultimately responsible for Program administration, as specified in their Federal-State operating agreement. [[7 CFR 292.13\(b\)](#); [7 CFR 292.16\(a\)\(3\)](#)]

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

No. FNS will provide Summer EBT funding, including administrative funds and benefits 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](#). [[7 CFR 292.20](#)]

87. Which ITOs can administer Summer EBT?

Similar to other Federal programs, an ITO is an Indian Tribe, band, or group recognized by the Department of the Interior or an intertribal council or group which is an authorized representative of Indian Tribes, bands or groups recognized by the Department of the Interior and which has an ongoing relationship with such Tribes, bands or groups. For the purposes of the Summer EBT program, this definition only includes those ITOs which administer WIC. ITOs that do not administer WIC, including ITOs that administer the Food Distribution Program on Indian Reservations (FDPIR), are not eligible to administer Summer EBT. A complete list of WIC ITOs, can be found on the FNS website: [WIC Program Contacts | Food and Nutrition Service \(usda.gov\)](#). [[7 CFR 292.2 "Indian Tribal Organization \(ITO\)"](#)]

88. Can an ITO administer Summer EBT if their geographic State doesn't administer the program?

Yes. ITOs can elect to administer Summer EBT if their geographic State has not yet launched its Summer EBT Program.

89. What vendors are eligible to accept Summer EBT benefit issues by an ITO?

Vendors authorized by the ITO to accept WIC benefits are eligible to accept the ITO's Summer EBT benefits. [[7 CFR 292.8\(f\)\(6\)](#)]

90. What types of food instruments may ITO Summer EBT agencies offer?

As part of USDA's continued commitment to Tribal sovereignty *and* self-determination, ITO Summer EBT agencies will have the flexibility to develop a method of benefit issuance and redemption that is appropriate for their communities and submit it for FNS approval via a Plan for Operations and Management (POM). For example, the ITO Summer EBT agency could

propose a cash-value benefit (CVB) model, a food package model, a combination of the two, or an alternate model. [[7 CFR 292.2 “Cash-Value Benefit \(CVB\)”](#); [7 CFR 292.2 “Food instrument”](#); [7 CFR 292.19\(a\)](#)]

91. Can ITO Summer EBT agencies provide the same foods that are authorized in their WIC Programs?

Yes. The requirements for Summer EBT supplemental foods are similar to the requirements for supplemental foods that can be purchased with WIC benefits. Therefore, an ITO Summer EBT agency may consider supplemental foods authorized in its WIC Program to also be eligible for redemption with Summer EBT benefits. However, infant formula and infant foods – even those that are WIC-approved – are excluded from use in this program.

The WIC food package provides a variety of nutrient-dense foods that contribute to children’s health. However, ITO Summer EBT agencies may consider offering additional foods including, but not limited to, foods that allow for different cultural eating patterns or that may be appropriate and appealing to elementary and high school-age children. [[7 CFR 292.19\(a\)](#)]

92. If ITO Summer EBT agencies use a cash-value benefit (CVB) model, will they be limited to only providing fruits and vegetables like WIC?

No. An ITO Summer EBT agency could implement a CVB model through which participants are able to purchase any Summer EBT supplemental food up to the value of the benefit. Although WIC Program CVB purchases are limited to fruits and vegetables, an ITO Summer EBT agency that chooses to implement a CVB model is not required to restrict Summer EBT CVB to the purchase of fruits and vegetables. For example, an ITO Summer EBT agency could develop a Summer EBT supplemental foods list and allow participants to purchase anything on the list until the benefit is exhausted. [[7 CFR 292.19\(a\)](#)]

93. What is the benefit level for ITO-administered Summer EBT Programs?

For ITOs using CVB-only benefit delivery model, the benefit level is equal to the amount set forth in statute and program regulations. For summer 2024, that amount is \$40 per month or \$120 for the summer.

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 the amounts provided above at the time of initial submission of the POM. ITOs electing to use one of these models should work with their FNS regional office in developing their food instrument, developing cost estimates, and submitting their proposed model to FNS for approval. [[7 CFR 292.19\(a\)\(1\)](#)]

94. **[NEW!]** What are the requirements for replacing Summer EBT cards that were received by the household but have been lost, stolen, or damaged?

Summer EBT agencies must make replacement EBT cards available for pick up or place the card in the mail within two business days following notice by the household to the Summer EBT agency that the card has been lost, stolen, or damaged (292.15(g)(4)). An immediate hold must be placed on the account at the time notice is received from a household requiring the need for card or PIN replacement. The Summer EBT agency is liable for and must replace any benefits

that are used after a card is reported as missing or stolen. The Summer EBT agency must implement a reporting system that is continually operative (292.15(g)(4)(ii)).

95. [NEW!] Is issuing benefits later than 7 days before the start of the SOP ever allowable?

Yes. Children who can be streamline certified or who complete an application and are approved for Summer EBT *in advance of the SOP* must be issued benefits 7-14 days before the start of the SOP. However, there are some situations where this is not possible or children become eligible after the start of the SOP. In these cases, a later issuance date is acceptable. When issuance prior to the start of the SOP is not feasible, Summer EBT agencies must comply with the following:

- Eligible children who apply too late to be included in the initial issuance file to be issued benefits 7-14 days before the start of the SOP must be issued benefits no more than 15 days after a complete application is received by the Summer EBT agency.
- Eligible children who become known to the Summer EBT agency after the start of the SOP, who become eligible during the SOP, whose families contested an initial determination that they were not eligible, or for whom the agency does not initially have enough information to issue benefits (e.g., missing address) must be issued benefits as soon as possible after the agency has enough information to confirm eligibility and issue benefits.

96. [NEW!] Could notices be in the form of a call or text/email rather than a mailed/paper-based notice?

Yes. Written notices, including expungement and eligibility notices, do not need to be sent through the mail, although physical notices are considered a promising practice when combined with other electronic forms of communication such as text or email.

97. [NEW!] Can a household appeal if it didn't receive an EBT card?

Yes. Households who were subject to an adverse action, such as not receiving their EBT card, may appeal within 90 days of the Summer operational period (7 CFR 292.26(a)(1)). If a household appeals and provides sufficient evidence, as described in Q&A #10, that it never received an EBT card owed to eligible children within that household and there has been no activity on the household's EBT account, then the Summer EBT agency is not considered to have issued benefits to the household. This includes situations where an EBT card is not delivered until after the expungement date. A determination that benefits were not issued means that the expungement deadline is not triggered because expungement is based on the issuance date (7 CFR 292.15(h)(1)). In such cases, the Summer EBT agency must issue benefits for those households using Federal funds and begin the expungement clock at the time of issuance.

98. [NEW!] What options do Summer EBT agencies have to handle fair hearing requests for households that did not receive an EBT card?

Per 7 CFR 292.26(b)(12), prior to initiating the hearing procedure, the household may request a conference to provide the opportunity for the household to discuss the situation, present

information, and obtain an explanation from the Summer EBT agency. In the event that the Summer EBT agency identifies a common error, such as a large number of households that never received their EBT cards, the agency has the option to develop a streamlined approach to resolve these cases via conference. For the purposes of a streamlined conference approach, a household with eligible children can prove that it never received benefits by providing evidence that they reside(d) at a different address from the address where the EBT card was initially sent. If the Summer EBT agency verifies that there was no activity on the household's EBT account, the agency may use Federal funds to issue benefits to households of eligible children that it determines meet these requirements without conducting a full hearing.

Households that cannot meet the two criteria above still have a right to a fair hearing. Summer EBT agencies must address these appeals on a case-by-case basis through the typical appeal process.

Financial Management

99. Will there be new administrative funds reporting requirements for Summer EBT?

Yes. FNS is developing the reporting requirements for Summer EBT and will make appropriate accommodations for 2024 to ensure Summer EBT agencies are able to meet the requirements. Summer EBT administrative funds reporting will consist of two primary reports: FNS-366A and FNS-778. Summer EBT agencies will estimate their administrative cost needs on the FNS-366A, *Program and Budget Summary Statement*, which will be submitted annually with the POM, or as revised throughout the year. Summer EBT agencies will report their incurred administrative expenses on an FNS-778, *Financial Status Report*, on a quarterly basis. Both forms are accessed and submitted using FNS' Food Program Reporting System (FPRS). Additional information on reporting requirements can be found in Memorandum SEBT 01-2024, FM 01-2024, *Summer EBT Administrative Funding Guidance*. [[7 CFR 292.23](#)]

100. What is required to receive an initial allocation of funds in FY 2024?

The Notice of Intent to implement in Summer 2024, which was due to FNS on January 1, 2024, along with an affirmative statement,¹ will enable States and ITOs to receive an initial allocation of funding while they wait for approval of their POM and FNS-366A. [[7 CFR 292.8\(a\)](#)]

101. Which activities do Summer EBT agencies need to reimburse Local Education Agencies (or LEA) for/not? Specifically, if a school collects alternative income applications regardless of Summer EBT, is it necessary to compensate schools for doing so?

In Summer 2024 only, Summer EBT agencies may delegate (i.e., assign) activities related to Summer EBT applications to LEAs. To be fully reimbursed by the Summer EBT State agency, the

¹ This statement is an affirmation that funds are available for the match for each Summer EBT agency that will receive administrative funds.

administrative costs incurred by the LEA must be new activities related to processing Summer EBT applications. For LEAs that plan to use alternative income forms to certify children for Summer EBT in 2024, many of these forms have already been accepted and processed by LEAs and in many cases any additional costs for these applications to be used for Summer EBT eligibility may be nominal. For example, if a local entity is already conducting an activity for other FNS program purposes (i.e., NSLP, SFSP) and the SEBT related activity is not generating significant additional costs, it may make sense for that activity to be charged to the original FNS program account. [[7 CFR 292.13\(q\)](#)]

102. Are Child Nutrition Technology Innovation Grants (TIG) permitted to be used for Summer EBT technology needs?

Yes. Summer EBT agencies may utilize TIG funds to support Summer EBT. This includes SNAP agencies and ITOs that have an agreement with FNS to administer Summer EBT. These funds can be used to fully support Summer EBT systems. More information on availability of FY 2024 TIG funding for Summer EBT and other Child Nutrition Program technology needs will be provided after the 2024 appropriations process concludes.

103. When Summer EBT administrative funds are sub-awarded to Local Education Agencies (LEAs), how should LEAs track and document these funds in their accounting system?

Since the Non-Profit School Food Service Account cannot be used for Summer EBT expenses, the LEAs would have to set up a separate accounting structure (cost centers and/or separate accounts) similar to any other type of grant that would normally be tracked outside of the Non-Profit School Food Service Account. [[292.20\(c\)](#); [292.20\(d\)](#)]

104. What are the matching requirements with respect to Summer EBT?

FNS is authorized to pay each Summer EBT agency an amount equal to 50 percent of the administrative expenses incurred in operating the program up to their approved FNS-366A level. This means that Summer EBT agencies may only draw 50 percent of expenses incurred from their Letter of Credit (LOC) and will be responsible for providing the required 50 percent match. [[7 CFR 292.20\(c\)](#); [7 CFR 292.20\(e\)](#)]

105. How can States and ITOs meet the matching requirement?

The Summer EBT agency must provide project costs paid for with State or ITO funds or with cash or in-kind contributions donated to the Summer EBT agency by other non-federal public institutions or third-party entities.

Non-federal sources of funding such as General State or Tribal funds, local tax levies, and donations from other governmental units will likely make up the majority of the match, but the value of goods like equipment, space, and supplies are examples of other things that, with proper documentation, might be used toward the matching requirement. The table below provides examples but is not meant to be limiting. [[7 CFR 292.20\(c\)](#); [7 CFR 292.20\(e\)](#); [7 CFR 292.20\(f\)](#)]

Category	Eligible Match and Cost Share Examples
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Cash	<ul style="list-style-type: none"> • Cash provided by State, Tribes, local entities (e.g., City, County, etc.), or other third-party entities.
Personnel	<ul style="list-style-type: none"> • Staff member hired to execute the grant full-time. • Staff hours spent in support of the grant. • Staff time managing contractors and partners. • Staff hours associated with the financial and administrative management of the grant that are not being directly billed to the grant but are supporting the project with portions of their time and not included as part of an indirect rate.
Goods	<ul style="list-style-type: none"> • Value of purchased or donated goods such as office supplies and IT equipment.
Services	<ul style="list-style-type: none"> • Purchased or donated services of third-party organizations (if donated, valued at the employee’s regular rate of pay and may include fringe and indirect costs). NOTE: Volunteer services are not allowable costs in Summer EBT.
Space	<ul style="list-style-type: none"> • Costs of space, such as office rental (charged relative to the scale of the award). For example, if the Summer EBT grant award amounts to 5% of an organization’s budget for the year, then 5% of space costs may be counted toward the match if they are not part of an indirect rate.
Utilities	<ul style="list-style-type: none"> • Costs of utilities, such as phone and internet service (charged relative to the scale of the award if not included within the indirect cost rate). <ul style="list-style-type: none"> ○ For example, if the Summer EBT grant award amounts to 5% of an organization’s budget for the year, then 5% of utility costs may be used as match.

106. What is third party in-kind matching and is it allowed?

Yes. Third party in-kind matching, except for volunteer services, is allowed. Third-party in-kind or “soft” matching includes, but is not limited to, the valuation of non-cash contributions provided by a third party. This could be a non-profit or private-sector partner, other units of government, educational partner, or others who may be providing in-kind match in the form of services, supplies, real property, and equipment. The value of the service may be used for the matching requirements, if the services are necessary, reasonable, allowable, and well documented under that Federal program.

107. Can third-party donations of cash be accepted as the non-federal match?

Yes. The Summer EBT agency match may consist of project costs paid for with State or ITO funds or with cash donated to the Summer EBT agency. This would include donations from philanthropic or other third-party entities. This is established at 7 CFR 292.20(e) and is consistent with 2 CFR 200.306, Cost Sharing or Matching, which sets forth that cash or in-kind contributions are generally allowable if they are verifiable, allowable, and necessary. Such donations must be used for costs captured in the Summer EBT agency’s approved budget. [[7 CFR 292.20\(e\)](#); [2 CFR 200.306](#)]

NOTE: FNS indicated in [Policy Memorandum SEBT 01-2024, Summer EBT Administrative Funding Process for FY2024](#), memo that the value of goods contributed by third parties would not be permissible, this was based on aligning the requirements with SNAP matching rules. However, FNS has reassessed and determined that the value of goods donated by third parties will be

allowed. This is established at 7 CFR 292.20(e), which supersedes SEBT 01-2024. [[7 CFR 292.20\(e\)](#); [2 CFR 200.306](#)]

108. How do I value in-kind costs to meet the match?

For third-party in-kind matching—such as supplies, equipment, real property, services, materials, or space—the value must not exceed the fair market value at the time of the donation. When a State, ITO, or local organization furnishes the services of an employee as an in-kind donation, these services must be valued at the employee's regular rate of pay plus an amount of fringe benefits that is reasonable, necessary, allocable, and otherwise allowable as an Summer EBT expense. [[7 CFR 292.20\(e\)](#); [2 CFR 200.306](#)]

109. Are volunteer services allowable expenses for reimbursement purposes?

The value of services rendered by volunteers is not allowable. [[7 CFR 292.20\(f\)](#)]

110. Can Federal funding from other sources be used to meet the match?

As a general rule, Federal funding may not be used to meet the match for another Federal program. On rare occasions, certain Federal funds are legislatively permitted to be used in this way. If a Summer EBT agency believes it has a Federal funding source that is allowable as a match, they should reach out to their FNS regional office for further discussion.

While FNS seeks to work with Summer EBT agencies to maximize the appropriate use of third party and other non-traditional contributions, appropriation of State or ITO funding is expected to be the primary source of the match. [[7 CFR 292.20\(c\)](#); [7 CFR 292.20\(e\)](#); [2 CFR 200.306](#)]

111. Can a State or ITO meet the matching requirement with costs that would normally not be considered allowable?

No. Matching and cost share funds have the same restrictions as federal funds. These funds must follow the same allowable and unallowable guidelines in their federal award. If, for example, a conference is unallowable under the grant award that has matching requirements, then grantees would not be able to use the matching funds instead. [[7 CFR 292.20\(c\)](#); [7 CFR 292.20\(e\)](#); [2 CFR 200.306](#)]

112. Are the administrative costs incurred by WIC-administering ITO that are associated with implementing and operating Summer EBT considered allowable WIC costs?

No. Costs associated with developing and implementing a Summer EBT program are not considered allowable WIC costs and may not be paid for with WIC funds. While Summer EBT agencies may also operate the WIC program, the two programs and funding remain distinct. WIC funding cannot be used by Summer EBT agencies for administration costs or benefits. See SEBT 02-2023, *Initial Guidance for Implementation of Summer EBT in 2024 by Indian Tribal Organizations Administering WIC*. [[2 CFR 200.405](#); [7 CFR Part 292 Subpart A](#)]

113. Can WIC Nutrition Services and Administration (NSA) or Operational Adjustment (OA) Funding be used to support Summer EBT implementation?

No. Federal funds can only be used for the purposes for which they were appropriated. NSA and OA funds are appropriated for WIC and, therefore, can only be used for WIC allowable costs. As

Summer EBT activities are not a WIC allowable cost, OA funds cannot be used for this purpose. [[31 U.S.C. § 1301\(a\)](#); [2 CFR 200.405](#)]

114. Can the same staff work on WIC, SNAP, or child nutrition programs and Summer EBT programs?

Yes, but only if staffing costs are properly allocated between programs. For example, WIC staff who are paid with WIC funding only must work on WIC and cannot work on Summer EBT. If a Summer EBT agency conducts activities that will benefit the administration of more than one Federal program, the agency must appropriately allocate administrative costs to each affected program. Summer EBT is distinct from other FNS programs, therefore, Summer EBT agencies may not use Federal funds intended for other FNS programs, including WIC, SNAP and child nutrition programs, for Summer EBT expenses.

Each Summer EBT agency in receipt of a Summer EBT grant must determine a reasonable basis for allocating costs among agencies and should transfer funding for the allocated cost using the appropriate State or ITO procedures for interagency charges. In general, if a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then the costs may be allocated or transferred to benefitted projects on a reasonable, documented basis. For further information on cost allocation principles, please reference [2 CFR 200.405, Allocable Costs](#). See also, SEBT 01-2024, FM 01-2024, [Summer EBT Administrative Funding Process for FY2024](#). [[2 CFR 200.405](#)]

115. Are Summer EBT administrative funds provided under a “reimbursement” model or “match” model?

Just like SNAP SAE Summer EBT has characteristics of both reimbursement and matching. It is reimbursable in the sense that States must first incur the expense and have bills on hand to pay before drawing funds. It requires a State match in that draws only represent 50% of the incurred expense. In drawing funds States must follow their CMIA agreement with Treasury and ensure that Federal funds are not drawn significantly in advance of State disbursement. Additionally, as Summer EBT administrative funds mirror the SNAP State administrative funds process, Summer EBT agencies may want to draw on the expertise of SNAP fiscal staff. However, Summer EBT is a distinct program and agencies should look to the Summer EBT program regulations for the governing rules (7 CFR 292.20(c)&(e)).

To be clear, State grant awards will be fully funded at the agreed upon FNS-366A level, in quarterly increments, so that States and their fiscal agents can see the federal commitments of funds to support this program. The discussion above is specific to when a State draws funds from their letter-of-credit to pay bills.

116. Does the Summer EBT agency have to front 100 percent of Summer EBT costs with non-federal funds in order to get the 50 percent SEBT federal share?

No. Summer EBT agencies may draw federal funds when they have bills on hand to pay consistent with their Cash Management Improvement Act agreement. However, Summer EBT

agencies are not required to fully disburse non-federal funds to pay for the incurred expense before SEBT administrative funds can be drawn from the letter of credit. This is not unique to Summer EBT and is consistent with Cash Management Improvement Act requirements minimizing the time that elapses between expenditure and draw of funding.

117. Do Summer EBT agencies have to meet the match on an expense by expense or category by category basis on the FNS-366A?

For any given expense States may draw only 50% federal funds. In any given draw from a letter-of-credit a State may be drawing for multiple expenses. On quarterly basis FNS will be analyzing your draws against your reported expenses on the FNS-778 with the expectation that they match within a 5% tolerance in total. At the point in which close out occurs, FNS will work with the State to ensure total letter of credit draws don't exceed 50% of total expenses.

118. What documentation is required for third party contributions?

Third party cash and in-kind contributions are allowable in Summer EBT provided that they are properly documented per standard documentation protocols. General federal standards for matching are established at 2 CFR 200.306. Additional details on documentation for some types of cost can be found within 2 CFR 200, Subpart E. For example, 2 CFR 200.430(i) outlines specific documentation standards for personal services. Summer EBT agency staff with questions around documentation requirements should consult internally with State or ITO fiscal staff to ensure compliance with State or ITO protocols/requirements. Summer EBT agency staff may also consult with their FNS Regional Office, Grants Management and Administrative Services point of contact for further guidance as needed.

119. Is there a difference between the FY 2025 interim POM and FNS-366A which is due on August 15, 2024, and the FY 2025 interim POM required to receive FY 2024 administrative funds?

The FY 2025 interim POM to receive FY 2024 administrative funds for planning costs must reflect costs to be incurred in FY 2024. FY 2024 administrative funds' period of performance ends on September 30, 2024, and plans should be submitted well before then to be able to utilize the FY 2024 administrative funds.

An FY 2025 interim POM and FNS-366A for FY 2025 administrative funds is due by August 15, 2024, in order to receive FY 2025 Summer EBT administrative funds. This POM and FNS-366A should reflect Summer EBT expenses that are anticipated to be incurred during FY 2025. The August 15th date is critical date to ensure that FNS can obtain the needed estimations to support the FNS budget and appropriations process, thus ensuring funds are available. [[7 CFR 292.8\(a\)](#); [7 CFR 292.8\(b\)](#)]

120. Does the February 15, 2024, deadline for final POM submissions apply to FY 2025 interim POMs submitted for the purpose of receiving FY 2024 administrative funding to support 2025 planning and implementation?

No. The February 15, 2024, deadline is for final FY 2024 POMs (i.e., final POMs associated with the 2024 benefit period). States and ITOs which plan to begin operating Summer EBT in 2025 may submit an FY 2025 interim POM and FNS-366A **after** February 15, 2024. States and ITOs

should note that the period of performance on all FY 2024 administrative funds will end September 30, 2024, regardless of when they were received, so States and ITOs are encouraged to submit these as soon as possible. [[7 CFR 292.8\(a\)](#); [7 CFR 292.8\(b\)](#)]

121. Can States and ITOs receive FY 2024 Summer EBT administrative funds for costs incurred in FY 2024 associated with planning for 2025 implementation after February 15, 2024?

Yes. States and ITOs may receive FY 2024 Summer EBT administrative funding for costs incurred in FY 2024 that are associated with implementation and planning for 2025 once an interim POM or final POM is approved. The February 15, 2024, deadline does not apply to these funds because that deadline is associated with 2024 POMs. States and ITOs should note that the period of performance on all FY 2024 administrative funds will end September 30, 2024, regardless of when they were received, so States and ITOs are encouraged to submit these as soon as possible. [[7 CFR 292.8\(a\)](#); [7 CFR 292.8\(b\)](#)]

122. What does a State or ITO need to submit in order to receive FY 2024 Summer EBT administrative funds to cover costs associated with planning and implementation of Summer EBT in 2025?

In order to receive FY 2024 Summer EBT administrative funding for planning and implementation costs associated with beginning the program in 2025, States and ITOs must submit the following:

- An FY 2025 interim POM; and
- An FNS-366A which describes the 2025 planning and implementation costs that are expected to be incurred in FY 2024.

An FY 2025 interim POM and FNS-366A submitted for the purpose of receiving FY 2024 administrative funds should describe only costs incurred in FY 2024. Additionally, please note that a separate Notice of Intent will not be required to receive FY 2024 funding for FY 2025 planning costs. [[7 CFR 292.8\(a\)](#); [7 CFR 292.8\(b\)](#)]