Food and Nutrition Service DATE: October 18, 2023

MEMO CODE: SEBT 01-2024, FM 01-2024

SUBJECT: Summer EBT Administrative Funding Process for FY2024

1320 Braddock Place Alexandria, VA 22314

TO: Regional Directors

Grants Management and Administrative Services

Child Nutrition

Supplemental Nutrition & Safety Programs

SNAP All Regions

State Agency and ITO Directors

**Child Nutrition Programs** 

**SNAP** 

All States and Territories Indian Tribal Organizations

WIC State Agencies

| Issuing Agency/Office: | USDA FNS  |  |
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| Summary:               | The Consolidated Appropriations Act, 2023 (P.L 117-328) authorized a permanent, nationwide Summer Electronic Benefit Transfer (Summer EBT) Program beginning in 2024. This memorandum: (1) provides information to assist States, ITOs, and Territories in preparing to implement Summer EBT in 2024; (2) applies to States, ITOs, and Territories that elect to administer the Summer EBT Program and administering agencies therein; and (3) relates to requirements under section 13A of the Richard B. Russell National School Lunch Act (NSLA) [42 U.S.C. 1762]. |  |

The Consolidated Appropriations Act, 2023 (P.L. 117-328) (the Act) authorized a permanent, nationwide Summer Electronic Benefit Transfer (Summer EBT) Program beginning in 2024. The Act requires FNS to promulgate interim regulations within a year of the Act's enactment. FNS is aware that States, including U.S. Territories, and covered Indian Tribal Organizations (ITOs) are already beginning to plan for Summer EBT and need certain information before the rule is published. This memorandum expands upon

the information on the Summer EBT administrative funding process provided in SEBT 01-2023, *Initial Guidance for State Implementation of Summer EBT in 2024*, June 7, 2023, and SEBT 02-2023, *Initial Guidance for Implementation of Summer EBT in 2024 by Indian Tribal Organizations Administering WIC*, June 13, 2023. It also provides specific information on the process by which administrative funding will be provided to operate the program in Fiscal Year (FY) 2024. For FY 2025 and beyond, this memo will be superseded by Summer EBT program regulations and subsequent guidance.

For the purposes of this guidance, any State agency or ITO that administers the Summer EBT program is defined as a Summer EBT agency. The term 'Summer EBT agency' refers to agencies cooperating on administration of the State or ITO's program as a whole unless the coordinating or partnering Summer EBT agency is specified. These terms are used to distinguish between the agency responsible for the overall administration of the program (i.e. the Summer EBT coordinating agency) and other State agencies involved in program operations (i.e. the partnering Summer EBT agency).

## **Requirements for Administrative Funding Requests (i.e. POMs)**

The statute requires each State or ITO that will operate the Summer EBT Program to submit to USDA for approval a management and administration plan by February 15 of each year. For the purposes of Summer EBT, this will be referred to as a Plan for Operations and Management (POM). USDA approval of the POM is prerequisite for a Summer EBT agency to draw Federal funds to cover USDA's 50 percent of administrative costs. Although a final POM is not due until February 15, an interim POM is due as soon as is practicable for FY 2024, and annually thereafter by August 15. Approval of an interim POM allows Summer EBT agencies to access Federal administrative funds in advance of completing the full planning process. The interim POM must include the Summer EBT agency's forecasted program participation, anticipated administrative funding needs as expressed on the FNS-366A, Expenditure Plan (i.e., Budget Projection Statement), and other programmatic information required in the final POM to the extent that such information has been determined at the time of submission. Additional information on the requirements for final POM submissions will be provided through separate guidance and in program regulations as promulgated in the forthcoming Interim Final Rule. The information included in the interim POM should be the Summer EBT agency's best estimates and will be subject to revision as more information becomes available.

The final POM submitted by each State and ITO operating the Summer EBT Program must include a budget which reflects:

- 1) the comprehensive needs of the State or ITO's Summer EBT Program, to include coordinating and partnering Summer EBT agency costs and any local agency costs, as applicable;
- 2) the Summer EBT agencies' plan to comply with any standards prescribed by the Secretary for the use of these funds;
- 3) how program funds will be used to the maximum extent practicable to reach eligible children; and

4) The total amount of administrative funding being requested and should denote amounts per Summer EBT agency

A final POM may be submitted in lieu of an interim POM at the discretion of the Summer EBT agency.

Both the interim and final POM must be accompanied by an FNS-366A, Expenditure Plan, reflecting planned administrative cost needs for the year. The FNS-366A submitted with the interim and/or final POM constitutes each Summer EBT agency's request for funds for planned administrative expenditures and may be subsequently revised. The FNS-366A will be submitted electronically in the Food Programs Reporting System (FPRS) under the Summer EBT program. This form will collect only Summer EBT administrative cost estimates and will be submitted separately from the FNS-366A under the SNAP program. Please see the instructions under Attachment A, developed to direct Summer EBT agencies in the completion of the FNS-366A and to provide guidance on how to estimate Summer EBT administrative costs. Please see Attachment B for additional information on Summer EBT report submissions.

A final approved POM will establish the Summer EBT agency's available administrative funding level for the fiscal year. However, Summer EBT agencies will have the opportunity to revise their FNS-366A throughout the operational year and increases for well-documented costs will be considered, subject to available funds. As noted below and in prior guidance, all administrative funds for Summer EBT are subject to a 50 percent matching requirement.

As noted in memorandum <u>SEBT 01-2023</u>, for States administering Summer EBT through more than one agency, the agencies may submit separate administrative funding requests (i.e., an FNS-366A, Expenditure Plan) for the administrative convenience of receiving funds without the need to transfer money between Summer EBT agencies. However, the agencies must coordinate to ensure that costs are properly allocated between the agencies.

**NOTE:** While administrative funds may be received prior to approval of a final POM, a Summer EBT agency **may not draw down Federal food benefit funds** until the final POM is approved.

## **FY 2024 Summer EBT Administrative Funding**

*Initial FY 2024 Administrative Funding Allocations* 

While the above section describes the general requirements for requesting administrative funding, FNS recognizes that Summer EBT agencies may need an initial increment of funding in FY 2024 to address immediate expenses while they develop and submit their interim and final POM, and accompanying FNS-366A, Expenditure Plan. Therefore, FNS will release an initial allocation of Summer EBT administrative funds to all Summer EBT agencies upon receipt of (1) a notice of intent to administer the program in 2024 and (2) an affirmative statement indicating that funding has been identified and is available to the Summer EBT agency to meet the required 50 percent match. The FNS-366A is not

required to draw funds against the initial allocation described in this section; however, Summer EBT agencies, including partnering agencies, may only draw 50 percent funding for expenses that have already been incurred.

The notice of intent must be provided no later than January 1, 2024 (see memoranda SEBT 01-2023) and SEBT 02-2023). A template notice and sample language for the affirmative statement will be provided through your regional office. The affirmative statement may be included as an attachment or sent subsequent to the notice of intent; however initial FY 2024 administrative funds will not be released until both have been provided. The affirmative statement must clearly attest that matching funds are available for each Summer EBT agency that will receive administrative funds.

The amount of the initial allocation will be based on expenditure and unliquidated obligation data reported to FNS on the SNAP PEBT Administration Grant (PAN-SNAP-PEBT-Admin) or the CN PEBT Administration Grant (PAN-CN-PEBT-Admin) reports, as appropriate in FYs 2021 and 2022. If no such data are available, then the initial amount made available will be \$100,000.

Initial FY 2024 funds will be a provided in amount equaling up to 16.25 percent of the average total expenditures for both grant years; or \$100,000, whichever is greater.

FY 2021 Total Federal Share of Expenditures and Unliquidated Obligations
+
FY 2022 Total Federal Share of Expenditures and Unliquidated Obligations

2

x

16.25%

or \$100,000, whichever is greater.

FNS regional offices will inform each State agency and ITO of the initial funding amount available to them once letters of intent and affirmative statements are received. Initial funding will be made available through FNS-529 grant awards, which will be modified once full budget proposals are approved.

#### Additional FY 2024 Funding

As stated in the *Requirements for Administrative Funding Requests* section above, an FNS-366A, Expenditure Plan, must be reviewed and approved by the FNS regional office as part of the interim and final POM. The FNS-366A submission should include the initial funding allocation described in the previous section (as applicable), as well as any additional funding needed beyond the initial allocation. Further revisions to the FNS-366A may be submitted throughout the year, as needed, to reflect the final administrative funding level for FY 2024. Additional requests and revisions are subject to the availability of funds.

#### FY 2024 Grant Agreements

Any Summer EBT agency that receives FY 2024 administrative funding as a direct grant must sign an FNS-529, Grant Award Agreement, with their respective FNS regional office. The FNS-529 with accompanying Terms and Conditions will be provided to Summer EBT agencies by their respective FNS regional offices at the time that initial awards are made. The FNS-529 will require modification to reflect final funding amounts. The Assistance Listing Number for Summer EBT administrative funds is 10.646 Summer Electronic Benefit Transfer Program for Children and will be included on the FNS-529.

FNS may alter this approach in FY 2025 by utilizing a Federal-State agreement in lieu of the FNS-529.

#### FY 2024 Period of Performance

The Period of Performance for FY 2024 Summer EBT administrative funding grants will be October 1, 2023, to September 30, 2024. Accordingly, any expenses incurred within this time period may be applied to the FY 2024 grant.

# FY 2025 Summer EBT Implementation Costs

States and ITOs intending to begin operating Summer EBT in FY 2025 may receive administrative funding in FY 2024 to cover planning and implementation costs related to FY 2025 Summer EBT operations. These Summer EBT agencies may receive their total FY 2024 Summer EBT administrative funding once their FNS-366A, Expenditure Plan, has been reviewed and approved by the FNS regional office as part of their FY 2025 interim POM, along with an affirmation statement indicating that funding has been identified and is available to the Summer EBT agency to meet the required 50 percent match. (Note: the FNS-366A should reflect anticipated expenses for FY 2024 only.) A new FY 2025 interim POM and FNS-366A will need to be submitted by August 15, 2024, to receive administrative funding for FY 2025, and an FY 2025 final POM will need to be approved in order to receive benefit funds for FY 2025.

## Method of Payment, Reporting, Recovery of Funds, and Records Management

Administrative funds will be provided for each Summer EBT agency's grant through a letter of credit (LOC). The LOC is the mechanism by which a Summer EBT agency can draw authorized funds from the United States Treasury. The draw of 50 percent funding from the LOC may occur once allowable expenses have been incurred. Summer EBT agencies must draw funds in accordance with their annual Cash Management Improvement Act Agreements and, to the greatest extent possible, should minimize the time lapse between drawing and expending funds.

Summer EBT agencies will report their incurred administrative expenses on an FNS-778, Financial Status Report, on a quarterly basis. Like the FNS-366A form, the FNS-778,

Financial Status Report, will be submitted electronically in the Food Programs Reporting System under the Summer EBT program. This form will collect only Summer EBT administrative expenses and will be separate from the FNS-778 submitted in connection with the SNAP program. Please see Attachment B for additional information on Summer EBT report submissions.

During the annual closeout for the grants, FNS will recover any administrative funds which are in excess of obligations reported at the end of each fiscal year through an adjustment in the Summer EBT agency's LOC.

Each Summer EBT agency must maintain Program records to support administrative costs and retain these records for a period of 3 years, or as otherwise specified in the governing funding terms and conditions. Additionally, these records will be subject to periodic Financial Management Reviews. For general federal recordkeeping requirements, see 2 CFR 200.334, Retention Requirements for Records.

## **Matching Requirements**

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 LOC. Each Summer EBT agency in direct receipt of a Summer EBT administrative grant will be responsible for providing the required 50 percent match. The Summer EBT agency match may consist of project costs paid for with State or ITO funds or with cash contributed or donated to the agency by other non-Federal public agencies and institutions. Consistent with 2 CFR 200.306, Cost Sharing or Matching, cash or in-kind contributions are generally allowable if they are verifiable, allowable, necessary, in the Summer EBT agency's approved budget, and not related to any other Federal program costs unless specifically provided in regulations. However, the value of services rendered by volunteers, or the value of goods contributed by third parties, exclusive of the State, ITO, and Federal agencies, are not allowable cash or in-kind contributions in the Summer EBT Program.

As a general rule, Federal funding may not be used to meet the match for another Federal program. However, 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 respective FNS regional office for further discussion. While FNS seeks to work with Summer EBT agencies to maximize the appropriate use of non-Federal contributions, appropriation of State or ITO funding is expected to be the primary source of the match.

#### **Allowable Administrative Costs**

Allowable administrative costs for Summer EBT administrative funds are to operate the Summer EBT at the State, ITO, and local levels. To be allowable as an administrative cost in Summer EBT, expenditures must be valid obligations of a Summer EBT agency or a local agency operating under a formal agreement with a Summer EBT agency,

inclusive of but not limited to contracts and subgrants. Additionally, costs must be necessary, reasonable, and allocable charges under an approved Summer EBT POM. Allowable costs are specified in the Office of Management and Budget's (OMB) Uniform Guidance (i.e., 2 CFR 200) and FNS regulations as promulgated in the forthcoming Interim Final Rule. The following conditions apply to allowable costs for Summer EBT products or services. Allowable costs must:

- Directly relate to an approved Summer EBT component or service, i.e., allocable;
- Be necessary and reasonable;
- Not be for products or services that are outside the scope of the Summer EBT Program; and
- Not be a general expense required to carry out the overall responsibilities of a State, ITO, or local entity.

Examples of allowable Summer EBT administrative expenses may include, but are not limited to:

- Salaries and benefits of personnel involved in Summer EBT and administrative support;
- Office equipment, supplies, postage, and copying/printing costs;
- Indirect costs;
- Outreach associated with enrollment or the delivery of Summer EBT; and
- EBT-related or other system costs.

## **Considerations for Local Agency Administrative Costs**

The expenses incurred by local education agencies (LEA) and other local agencies carrying out Summer EBT operational activities under formal agreements with Summer EBT agencies are allowable costs under Summer EBT administrative funding grants. However, in no cases may non-profit school food service account funding be used to meet the Summer EBT match.

The statute requires *States and ITOs* to make an application available for eligible children to apply who are not certified through streamlined certification. 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 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. Summer EBT agencies are only required to reimburse for expenses directly related to the activities and processes required to implement the Summer EBT program.

# **Cost Allocation Requirements**

Summer EBT is distinct from other FNS programs, therefore, Summer EBT agencies may not use Federal funds intended for other FNS programs (e.g., SNAP, WIC, National School Lunch Program/School Breakfast Program, etc.) for Summer EBT expenses. 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. As a reminder, Child Nutrition State administrative expense funds may not be used to support Summer EBT costs in FY 2024 and beyond.

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.

For any additional information needed on the contents of this memorandum, please contact your FNS regional office.

Sincerely,

Original Signed

Melissa Rothstein Associate Administrator Child Nutrition Programs

Original Signed

Diane M. Kriviski Associate Administrator Supplemental Nutrition and Safety Programs Original Signed

David Burr Deputy Administrator/Chief Financial Officer Office of Financial Management

Original Signed

Cathy Buhrig
Associate Administrator
Supplemental Nutrition Assistance Program

**ENCLOSURES** 

Attachment A – Completing the FNS-366A for Summer EBT Attachment B – Summer EBT Administrative Funds Reporting

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## Attachment A - Completing the FNS-366A for Summer EBT

#### **General Instructions**

When projecting estimated costs for the Summer EBT Program, Summer EBT agencies will utilize the FNS-366A, Expenditure Plan, i.e., *Budget Projection Statement*. While the existing instructions included with the standard FNS-366A provide guidance on the types of costs to include in each category of the form, FNS is providing additional instructions to assist States with completing the FNS-366A specifically for Summer EBT. FNS expects that only certain cost categories will be used by State agencies for Summer EBT versus the Supplemental Nutrition Assistance Program (SNAP) operations and the additional instructions provide more information on those specific categories of costs. Please note that the section titles listed below match the section titles listed on the FNS-366A

Summer EBT agencies should complete the information in Boxes 1, 4, 4A and 4B at the top of the form. The State Agency or ITO name (Box 1) is required. FNS prefers to have the information for Boxes 2 and 3 if it is available when completing the form, but it is not required.

# **Applicable Categories for Potential Costs in Summer EBT**

Listed below are the categories *most likely* to be applicable to the costs associated with Summer EBT and examples of costs States may have related to each category.

- **01** Certification Salaries and fringe benefits for full or part-time certification and multifunctional workers for their estimated time actually engaged in certification of Summer EBT participants. Please consider all relevant resources as well as staff, rates, and the amount of time (hours or percentage) spent on Summer EBT activities.
- **07 ADP Operations** Salaries and fringe benefits for full or part-time personnel and other operational costs of maintaining computer systems performing Summer EBT functions. Please consider all relevant resources as well as staff, rates, and the amount of time (hours or percentage) spent on Automated Data Processing (ADP) operational activities. Contractor costs should include similar considerations. (*Any ADP development activities required to stand up Summer EBT systems should be included in section 21*)
- **16 Outreach** Include as outreach costs only those costs for Summer EBT Program informational activities. Please take into consideration the methods and frequency of outreach activities and rates and amounts used to develop the Outreach total costs.
- 21 50% Funding ADP Development Project salaries and fringe benefits for full or part-time personnel and other costs required to stand up Summer EBT systems or adapt the State Agency's systems for Summer EBT activities. Please consider all relevant resources as well as staff, rates, and the amount of time (hours or percentage) spent on ADP development activities. Contractor costs should include similar

considerations. Note that the use of the term "50% Funding" in this category title is in reference to a specific SNAP funding requirement and is not relevant to Summer EBT reporting. It should not be interpreted to be a reference to the Summer EBT 50 percent match requirement. For the purposes of Summer EBT, 100% of applicable ADP development costs should be reported in this section. *All ADP operational costs should be included in category 07*.

**24 EBT Issuance** - Enter the salaries and fringe benefits for full or part-time workers engaged in EBT issuance. For EBT contractor costs, this includes the costs of printing cards and issuance fees. Please consider all rates, frequency of costs, and participant assumptions used in development of the SEBT benefit issuance costs.

**27 Unspecified Portion of Other** - Enter the salaries and fringe benefits for full or part-time workers engaged in Summer EBT activities that do not fall into any of categories listed above.

**Please note:** Customer Call Centers may be included in category 27, *Unspecified Portion of Other*, if they are general in nature or handle activities in more than one of the above categories. For example, budget costs for a Call Center handling all Summer EBT questions including Certification, Outreach, and/or Issuance questions would be included in category 27 for ease of reporting, while the budget costs for a Call Center handling questions for only one of the other sections listed above can be included in that category.

#### **Categories not relevant to Summer EBT**

Many of the categories of the FNS-366A are related to submitting budget information for the SNAP program, therefore, certain categories will not be relevant to Summer EBT and should not be filled out. The following categories should **NOT** include any budget amounts for Summer EBT:

**Section 2 Coupon Issuance** – This category is only for non-EBT issuance activities, therefore the SEBT budget should not include any amounts in this category.

**Sections 11-15** – These categories are for Employment & Training and Workfare activities, therefore the SEBT budget should not include any amounts in these categories either.

Sections 22-23 – These categories are for Funding ADP Development activities at higher percentages. Currently, all activities are authorized to be reimbursed at the 50% Federal Financial Participation rate, therefore the SEBT budget should not include any amounts in these sections either.

**Section 28 E&T ABAWD Grant** – See explanation for sections 11-15.

## **Considerations in Developing Estimates for Administrative Costs**

When completing the FNS-366A, the Summer EBT agency will want to estimate their administrative cost needs relating to the operation of the program for the fiscal year. These estimated costs should align with the scope of the program as outlined in the Plan for Operations and Management (POM). When considering how to estimate costs, we recommend that State agencies give thought to the types of activities that will be needed to operate the program each year and the level of participation anticipated. For example, when considering activities, thought should be given to staffing, outreach efforts, call centers, help desks, and issuance or processing costs.

Summer EBT agencies may need some assistance in estimating the appropriate amount of administrative funding in these initial years. To get a general sense of funding needs, Summer EBT agencies may want to reference their historical P-EBT expense data by category from FY 2021 and FY2022, if applicable. While the total amount of funding for a given category will vary widely across Summer EBT agencies, general trends can be seen in this data which can help inform State and ITO planning. Summer EBT agencies may find assessing the comparison between P-EBT and Summer EBT costs based on the percentage of total funds allotted to each individual cost category as a way to estimate costs associated with certain activities.

For example, to determine their Summer EBT request amount, States can take their average P-EBT administrative funding expenditures across fiscal years FY 2021 and FY 2022, account for the 50 percent match, and then use the percentage ranges below to allocate costs per category. While States need to account for the 50 percent match when using P-EBT levels as a basis for their Summer EBT costs, States may want to plan for additional costs associated with program implementation.

To assist with this approach, FNS has calculated the percentages below using national P-EBT administrative funding expenditure data to provide a starting point for State and ITO estimations. States and ITOs may apply these percentages found in the table below to the total amount of Summer EBT funding you plan to request.

| COST CATEGORY                   | Average % of Cost |
|---------------------------------|-------------------|
| 01 Certification                | 20% - 25%         |
| 07 ADP Operations               | 1%-5%             |
| 16 Outreach                     | 1%-5%             |
| 21 50% Funding ADP Development  | 1%-5%             |
| 24 EBT Issuance                 | 55%-65%           |
| 27 Unspecified Portion of Other | 1%-10%            |
| * Other Categories              | 1%-2%%            |

Below we have also provided guidance by typical cost categories to assist with your planning processes.

Certification Related Costs (typically reported in category 01)

Typical costs include salaries for staff that handle initial determination of eligibility or other case maintenance, calculation of benefit amounts, and re-certification of households. Other costs may include help desks or hotlines to help with questions on who qualifies for benefits, and contractor or other costs related to determining benefit eligibility or other case maintenance.

Processor Related Costs (typically reported in category 24)

Summer EBT agencies should estimate their processor related costs by considering the costs of EBT cards, replacement cards, processing fees, etc.

When estimating need in this area, Summer EBT agencies should begin by considering the total number of potential issuances multiplied by the cost of the new or replacement card, or potentially both, as well as processing fees. Consideration should be given to whether the Summer EBT agency will want to piggyback their Summer EBT issuance onto their existing SNAP card or create a separate Summer EBT card. Some Summer EBT agencies may feel it is important to separate the two cards for branding purposes, which may impact costs. The costs may differ depending on the choice or for various other reasons. For example, it is unlikely that all Summer EBT agencies will experience the same economies of scale as SNAP agencies and thus cost comparisons to SNAP costs per case month may not be applicable. However, if opting to provide the Summer EBT benefit on a SNAP card, a separate contract for the Summer EBT portion of issuance will still be required.

## System Related Costs (typically reported in multiple categories)

Systems costs may include staffing hours and contractor costs related to development and operation of eligibility or other systems used to provide benefit issuance information or otherwise provide system development and operation for the Summer EBT agencies. It can include Staff time allocated to Summer EBT system development work to accommodate changes for the upcoming year. This can also include estimated contractual costs for card issuance if this is handled by the Summer EBT agency and not the EBT vendor. Hours and cost are calculated based on time needed for development, testing, implementation.

Outreach Related Costs (typically reported in category 16)

Typical costs include printing of notices, flyers, toolkits, quick reference guides, postage, or any other cost related to communicating with the public on Summer EBT. This could also include staffing costs related to the delivery of these materials.

Costs Captured in Category 27, Unspecified Portion of Other

The costs applied to this category are usually general in nature and often may not be attributable to one Summer EBT function. Common costs captured in this category are for personnel involved in all aspects of Summer EBT delivery, and Customer Call Centers handling *all* Summer EBT questions and activities.

# Attachment B - Summer EBT Administrative Funds Reporting

S-EBT administrative funds reporting consists of two primary reports: the Program and Budget Summary Statement (FNS-366A), and the Financial Status Report (FNS-778). These reports will be used to track Summer EBT budgets and spending during the federal fiscal year and will be collected separately from other program financial data.

Both forms are accessed and submitted using FNS' Food Programs Reporting System (FPRS). Agencies receiving administrative funds directly from FNS for the operation of the S-EBT program will be required to submit the annual FNS-366A and quarterly FNS-778 reports. To ensure the appropriate staff within your agency have access to these forms, please provide the reporting contacts to your FNS regional office. The FNS regional office will work with the FPRS database administrators to ensure access to the Summer EBT reports is provided on an as-needed basis.

To access the Summer EBT reports within FPRS, users should navigate to the Online Forms tab, then to the Submit/Revise page. Within the submission studio, users will select the S-EBT Summer Electronic Benefit Transfer 'Program', and then find the appropriate report by selecting the dropdown menu in the 'Form' row. Once the 'Program' and 'Form' are selected, the user should select the FY2024 grant year and the appropriate reporting period for the selected form.

Please note that since these forms (FNS-366A, FNS-778) are used for other FNS programs, selecting the Summer EBT 'Program' is critical to ensure that the data for Summer EBT is captured separately from other FNS programs.

Questions related to user access and reporting should be directed to your FNS regional office.