

Opportunities to Improve Summer EBT

Perspectives from state SNAP agencies

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KEY TAKEAWAYS

Summer EBT is a federal program that provides [grocery benefits to low-income families with children during the summer months](#).

In 2024, [13 states did not opt into the program](#), citing an inability to match funds and a lack of timely guidance from the Food and Nutrition Service.

States that implemented Summer EBT had limited time to develop their plans and struggled to build data infrastructure. [Four out of five states reported managing out-of-date or incomplete student data as a challenge](#).

To improve the program and increase uptake, USDA could provide [clearer program and data-sharing guidance, more supports for data infrastructure](#), and [greater program flexibility](#).

Launched in 2024, Summer Electronic Benefits Transfer (EBT), or SUN Bucks, is a federal program that provides grocery benefits to low-income families with children during the summer months. The program fills an important gap in summer food assistance programs by providing families the flexibility to purchase the food they need when they need it.

In collaboration with the American Public Human Services Association, the Urban Institute surveyed state Supplemental Nutrition Assistance Program (SNAP) directors. We asked them about what challenges they faced and what supports could have been helpful while implementing the new program.

In this summary, we outline what challenges states faced and how the US Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) could improve the program's implementation and ultimately drive more states to opt in.

FILLING THE SUMMER GAP

Rising food prices and the absence of COVID-19 pandemic supports led food insecurity to rise to 17.9 percent in 2023 among households with children (up from 17.3 percent in 2022; Rabbitt et al. 2024). Evidence shows food hardship increases among low-income households with children during the summer, when children no longer have consistent access to free or reduced-price meals at school (Huang et al. 2015).

To address this need, the USDA offers schools or other community sponsors funding to operate in-person summer meal programs, such as the Summer Food Service Program, which allow eligible school-age kids to access free meals. It also supports noncongregate, or grab-and-go meal programs—though these were only available in rural areas as of 2023. Still, in 2023, only about one in six students who received free or reduced-price meals during the school year received a summer lunch.¹

In 2011, the USDA began piloting a program that gave families EBT benefits during the summer months. The pilot found giving families grocery benefits reduces food insecurity, including severe food insecurity, among children by up to 20 percent, and encouraged greater consumption of fruits and vegetables.² Pandemic-EBT, a comparable program that ran during the COVID-19 pandemic, similarly reduced food hardship, though the benefit amount was larger.³ Other research has shown that families, particularly in

rural areas, appreciate the flexibility of EBT benefits compared with in-person and grab-and-go meal options. Cash benefits provide more flexibility in what a household can purchase and do not require additional travel to a meal site (Anderson et al. 2023).

HOW SUMMER EBT WORKS

States that opt into Summer EBT provide qualifying families with \$40 in grocery benefits per eligible child per month (a total of \$120 over three months) to use at retailers that accept SNAP benefits.

Though tribal nations can also administer the program, they cannot provide grocery benefits. Instead, tribal nations must provide a prescribed food package following the Woman, Infants, and Children (also known as WIC) program model.⁴

Children automatically receive the benefit if they are school-age and already receive benefits through SNAP, Food Distribution Program on Indian Reservations, Temporary Assistance for Needy Families (TANF), or Medicaid in certain states. Children who are certified as eligible for free or reduced-price meals via the National School Lunch or School Breakfast Program are also automatically enrolled.

Families with children in Community Eligibility Provision schools who are eligible for the program but are not automatically enrolled must apply using their state's application process. Roughly one in five income-eligible families do not receive SNAP⁵ and even fewer receive TANF.⁶ Thus, providing applications to households can help states reach more families, especially those that may avoid safety net programs because not all family members have lawful immigration status. These families are also more likely to face higher rates of food insecurity (Bernstein et al. 2024).

WHAT WE DID

From May to June 2024, the Urban Institute and the American Public Human Services Association surveyed state SNAP directors about the challenges they faced during the Summer EBT plan writing and approval process, while building or managing data infrastructure for the program, when working with state agencies, and with issuing benefits. We also asked how they would change program administration in 2025. Forty-two SNAP directors completed our online survey. Among them, 33 implemented the Summer EBT program in 2024.⁷

KEY FINDINGS

States that did not opt into Summer EBT cited an inability to meet match-funding requirements and insufficient or delayed guidance from FNS. They also cited state-level barriers to implementing the program, such as limited workforce capacity, a lack of state infrastructure, and misalignment with the state's priorities.⁸ States that opted into Summer EBT cited similar barriers to implementation. These challenges are listed in the sections below.

Limited Time to Plan and Delays in Plan Approval

States had limited time to develop and seek approval for their implementation plans. Though the USDA shared initial program guidance in summer 2023, it did not publish the interim final rule detailing key program processes until late December 2023. States and tribal nations had only about six weeks to finalize their plans: they had to confirm their intent to implement Summer EBT in January 2024 and submit their final plans by February 15.

FNS quickly provided initial feedback on final plans, but two out of five survey respondents reported waiting over three months after submitting to receive final FNS approval. However, only 10 percent of states reported the plan approval process itself was difficult.

Thirty-seven states, the District of Columbia, all five US territories, and two tribal nations in Oklahoma implemented the Summer EBT program in 2024. Thirteen states did not opt in.

States also had to submit waivers to obtain the flexibility they needed to implement the program for the first time. All survey respondents that opted into Summer EBT in 2024 requested to waive the requirement to issue benefits within 7 to 14 calendar days of the start of the summer. Substantial data collection and management needed to be completed before states issued benefits, so rapid distribution of benefits was not feasible in 2024. On average, respondents submitted three waivers each.

Cost and Difficulty of Operating the Program

States expressed difficulty with getting all the necessary pieces in place to launch the program. Under federal law, state agencies can only be reimbursed for 50 percent of the program's administrative costs. This includes staffing costs (such as temporary hiring), developing data systems, and bringing on external contractors to support key tasks like data collection, benefit dissemination, and customer service. Survey respondents said this reimbursement level was insufficient to develop and operate an entirely new program, and exacerbated capacity issues.

Lack of Staffing Capacity and Difficulty Partnering with Other State Agencies

Although the USDA does not mandate that a state's SNAP agency lead Summer EBT implementation, only four states had a different agency lead the program. To administer benefits, Summer EBT requires state SNAP agencies to partner with their state's child nutrition agencies because both agencies need to contribute data to determine eligible students. Child nutrition agencies must provide the state SNAP agency with data on eligible students using free and reduced-price meal data. In addition, though some SNAP agencies could utilize their lists of families receiving SNAP, TANF, Food Distribution Program on Indian Reservations, or Medicaid to identify eligible students, others had to partner with human services agencies to access these data. Most federal nutrition programs do not involve this level of coordination between state agencies.

Our prior research has shown SNAP and child nutrition agencies face several challenges in maintaining efficient partnerships, most notably because of a lack of updated or complete contact information for students in school records (Waxman et al. 2021).

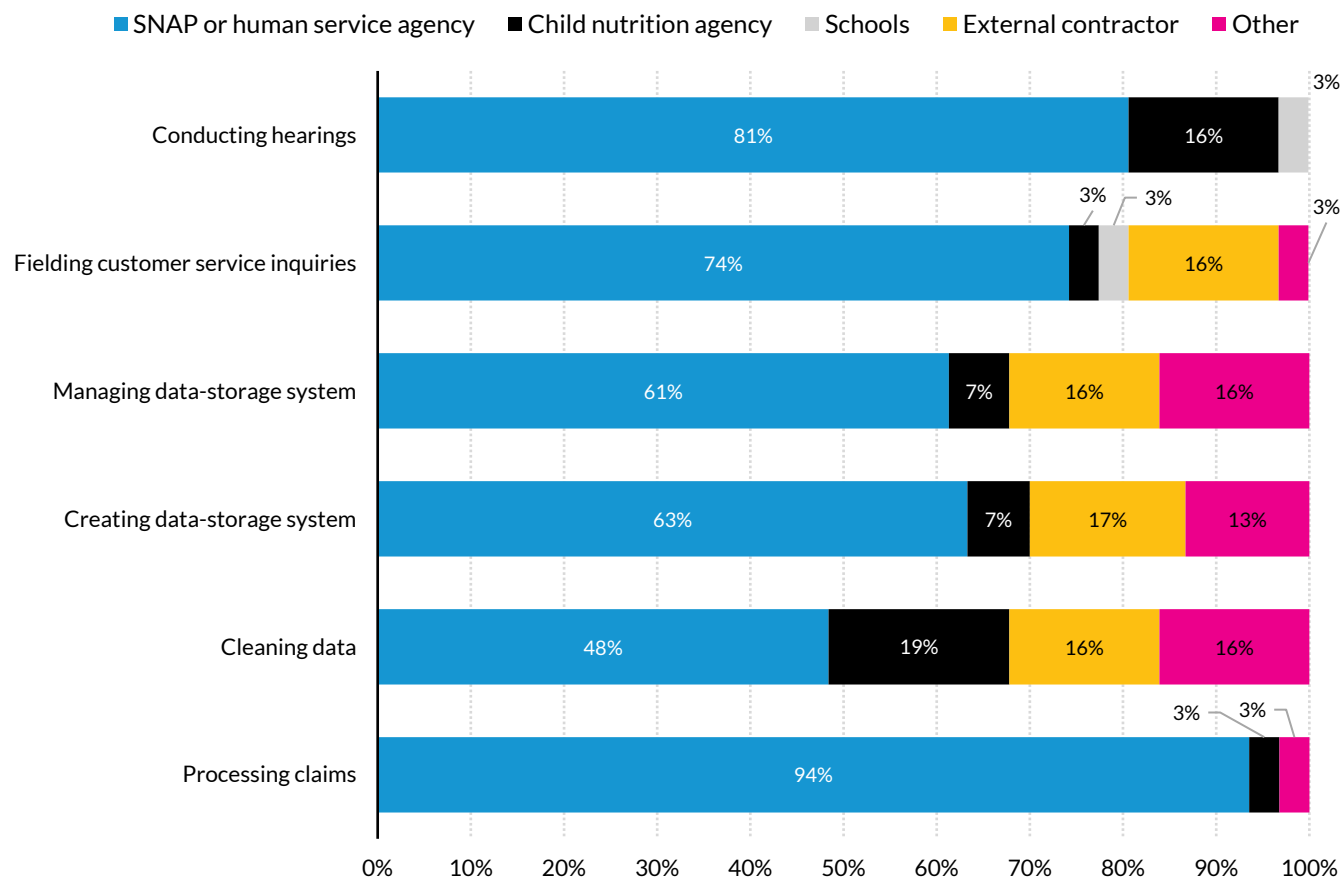
Despite the expectation of partnership between child nutrition and SNAP agencies, state SNAP agencies were primarily responsible for running the program, our survey showed (see figure 1). State SNAP directors said their agency was primarily responsible for activities such as creating (63 percent) and managing data systems (61 percent). Other administrative tasks, like fielding customer service inquiries (74 percent), processing claims from customers (94 percent), and conducting hearings for customers disputing an action taken (81 percent) were also largely the responsibility of SNAP agencies. The task of cleaning data was more evenly shared between agencies, likely because data were sourced from both agencies.

State SNAP agencies also took on these increased responsibilities at a time when their capacity was already strained. During the public health emergency unwinding throughout 2024, state agencies struggled to return to normal operations and staffing capacity⁹ and address concerns with payment accuracy¹⁰ and overall benefit administration.

FIGURE 1

Though They Partnered with Child Nutrition Agencies, State SNAP Agencies Were Primarily Responsible for Implementing Summer EBT

Entity responsible for a given implementation activity according to survey respondents



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Source: Urban Institute Survey fielded May-June 2024.

Notes: CN = Child Nutrition; SNAP = Supplemental Nutrition Assistance Program. N = 31 respondents answered this survey question. Respondents were asked, "What entity is primarily responsible for the following activities?"

Creating New Infrastructure to Collect and Manage Data and Applications

Under the program rules, state SNAP agencies can directly issue benefits to most eligible children in their state. This process, sometimes referred to as "streamline certification," does not require households to fill out an application. To identify eligible children, agencies need to use their own data on children receiving SNAP, TANF, Food Distribution Program on Indian Reservations, or in certain states, Medicaid, and data from either the state's child nutrition agency or Department of Education on children eligible for free or reduced-price meals during the school year.

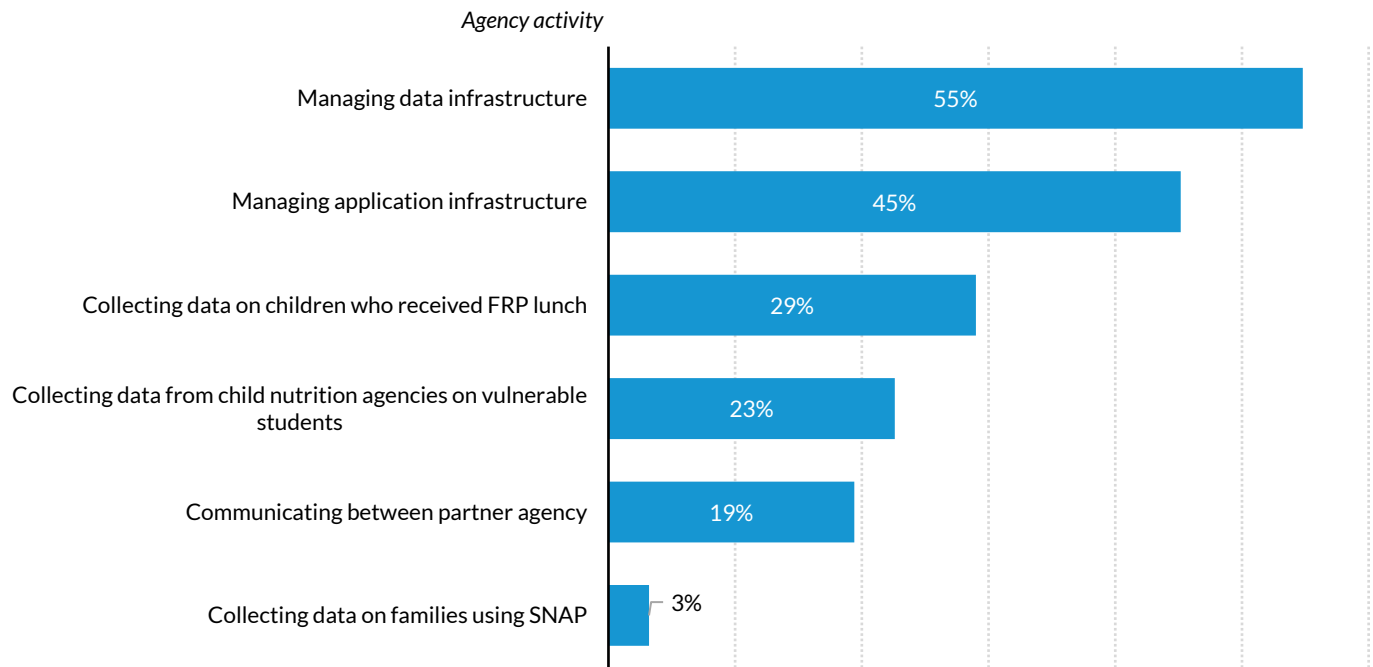
However, almost half of survey respondents said their state did not have a statewide database of children eligible for free or reduced-price school meals. As such, state SNAP agencies often had to work directly with schools or school districts to obtain the data. Schools did not collect these data for the purpose of delivering Summer EBT, so the data did not always contain the necessary information, such as a child's mailing address.

In our survey, four in five (79 percent) state SNAP agencies reported dealing with or anticipating dealing with out of date or incomplete student data to implement the program. Three in five (62 percent) struggled or anticipated struggling to link this data to their agency’s existing datasets (data not shown). This further strained the agency’s staffing capacity and ability to run the program.

Overall, about half of respondents (55 percent) said creating the necessary data infrastructure to run the program was difficult (figure 2). When asked what aspect of the program they would modify or enhance in 2025, the majority of respondents said they plan to enhance their data systems.

FIGURE 2
More Than Half of State SNAP Agencies Reported Difficulty with Managing the Data Infrastructure Needed to Implement Summer EBT

Share of respondents who reported an activity was “difficult” or “very difficult”



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Source: Urban Institute Survey fielded May-June 2024.

Notes: FRP = free and reduced price; SNAP = Supplemental Nutrition Assistance Program. N = 54 responses of “difficult” or “very difficult” to a set of survey questions that asked, “Please describe how easy or difficult each of the following activities are, or you anticipate to be, related to collecting data and managing data infrastructure in 2024.”

Almost half of respondents (45 percent) also said building the application infrastructure was difficult. Most states (48 percent) created a new application for Summer EBT, while a third of states (35 percent) used existing school forms or alternate income forms (used by schools that do not collect free and reduced-price meal forms). Only 10 percent of states used Nutrilink, the application infrastructure offered by USDA. Given that we administered our survey in May and June, this percentage may have changed throughout the summer.

Issuing Benefits in a Timely Manner to Families

When states issued benefits to families varied substantially given the challenges they faced collecting and cleaning data. In our survey, many state SNAP agencies said it was easiest to issue the benefits via streamline certification. Almost half (42 percent) of states said they planned to issue benefits to this group within one month of the start of

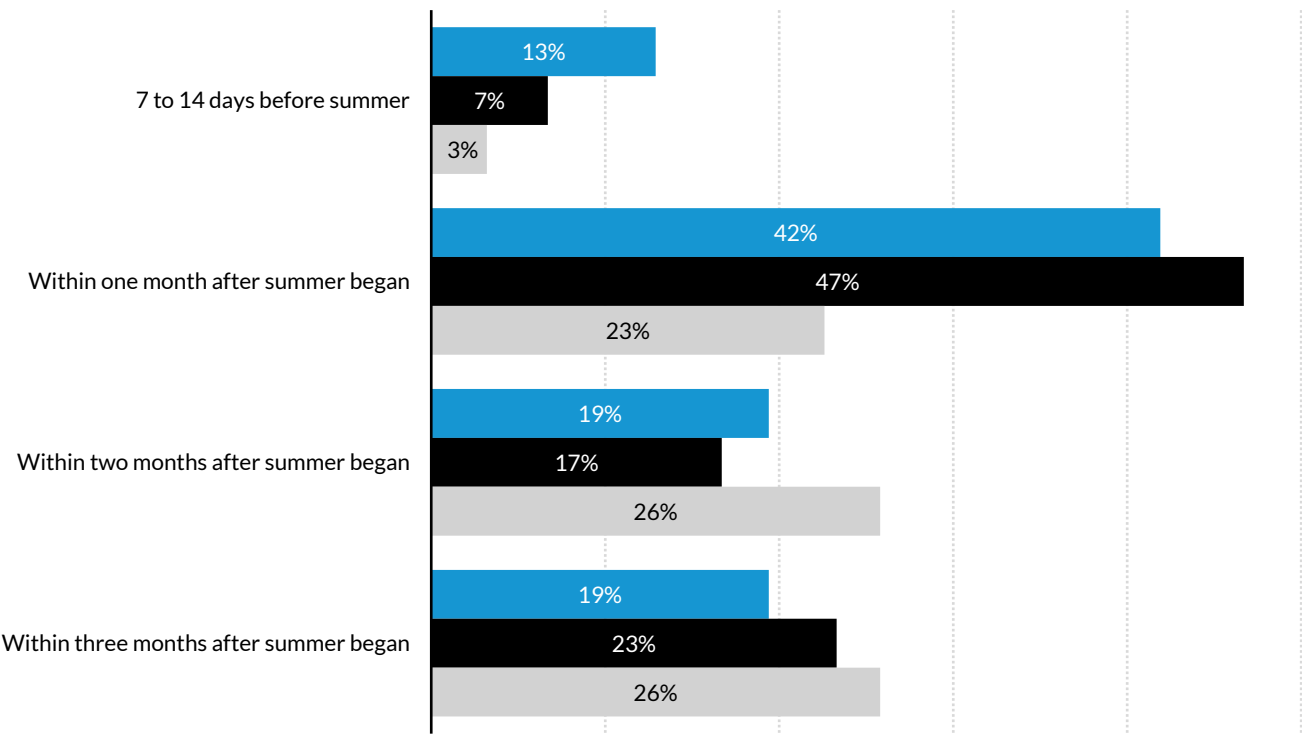
the summer. However, only about a fifth of respondents predicted they would issue benefits within one month to families that had to apply to the program (figure 3).

Issuing benefits in a timely manner is critical to fulfilling the program’s goal of reducing food insecurity. This is especially true for families that applied to the program because they may be less likely to be receiving other forms of assistance.

FIGURE 3
Three-Quarters of State Agencies Predicted They Would Not Be Able to Issue Summer EBT before the Summer Began

When respondents anticipated issuing benefits, by how a family was eligible

- Automatically certified families enrolled in a qualifying federal assistance program
- Automatically certified families eligible for FRP
- Families that submitted an application



URBAN INSTITUTE

Source: Urban Institute Survey fielded May-June 2024.

Notes: N= 31 respondents answered this survey question. Respondents were asked, “When do you expect to be able to distribute your first issuance in the following groups?” Under program guidelines, each state defines when the summer begins based on the end of the prior school year and start of the next school year.

Despite the barriers they faced, most respondents who implemented the program said they would continue offering it. Many suspected these challenges would arise again in 2025 because the program is new and offers states little planning time. Plans for summer 2025 are due in February 2025 and must be approved before states can access federal funds. As one state SNAP director explained as part of an open-ended survey question, “Year one is about getting the program off the ground. Year two will be about working off of a new schedule.... Year three will likely be the first year the program doesn't feel like a year-one program.”

RECOMMENDATIONS TO IMPROVE SUMMER EBT

These findings highlight five key ways USDA can improve Summer EBT by reducing the barriers states face to implementing and opting into the program.

1. **Provide clear guidance to states.** In summer 2025, states who already ran the program will have a better idea of its rules and requirements, and states that did not opt in can refer to how other states successfully implemented the program. To help smooth the implementation process, USDA should quickly respond to questions from states and share answers across states to ensure everyone has access to the same information.
2. **Provide additional support for states to develop data management systems.** In 2026, states will be required to develop a statewide database for school enrollment and free and reduced-price lunch data. However, it is still unclear how states should set up this database and most states do not have a similar system in place. FNS has already released \$100 million in noncompetitive technology grants that could help states build out their databases.¹¹ To reduce barriers to uptake and implementation, USDA should provide additional guidance for states on what constitutes a database and develop minimum standards for school data (e.g., cleanliness and completeness of data).
3. **Clearly outline data-sharing requirements.** Several states struggled to request data from schools and local education agencies. To help states streamline this data-collection process and more easily identify students who are eligible, FNS should collaborate with the Department of Education to produce joint guidance on Family Educational Rights and Privacy Act (also known as FERPA) rules. This could help clarify misconceptions schools and school districts may have about whether they can share data.
4. **Offer guidance on how SNAP agencies and child nutrition agencies should work together.** Summer EBT's original statute does not define how these agencies should partner. FNS could suggest what roles each agency takes on to help ensure the burden of implementation does not fall disproportionately on one agency and the work is shared more equitably.
5. **Continue allowing states to request flexibilities in administrative program requirements in 2025.** States are still figuring out how to implement Summer EBT. The option to waive issuance timeline requirements again in 2025 could help states get the program running. Still, states should prioritize issuing benefits to families in a timely manner. To reduce further barriers to implementation, FNS could consider additional flexibilities for new state system change requirements set to take place in 2025, such as implementing a statewide database.

Policymakers could also reduce barriers to implementing the program. They could help more states opt into the program by matching 100 percent of the administrative costs of running Summer EBT. Limited match funding is a significant barrier for states because they cannot hire additional staff or make long-term technology enhancements. Policymakers could also require schools to share data with the state agency for the purposes of Summer EBT implementation, as they did during the prior iteration of this program (i.e., Pandemic EBT). This would alleviate schools' concerns about Family Educational Rights and Privacy Act requirements and could facilitate data sharing between schools and SNAP agencies.

Summer EBT is a critical, evidence-based form of assistance that helps families, especially those in rural areas, access food during the summer. Understanding and addressing the key challenges state SNAP agencies face when implementing the program can lead more states to opt into the program and ultimately reduce food insecurity across the US.

NOTES

¹ Kelsey Boone and Crystal Fitzsimmons, "Hunger Doesn't Take a Vacation: Summer Nutrition Status Report 2024," Food Research and Action Center, 2024. <https://frac.org/summer-report-2024>.

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- ² Food and Nutrition Service, “Summary of the Evaluation of the USDA Summer EBT (Electronic Benefits Transfer) Demonstrations: Lessons Learned from More Than a Decade of Research,” United States Department of Agriculture, 2024. <https://www.fns.usda.gov/sites/default/files/resource-files/ops-sebt-summary.pdf>.
 - ³ Lauren Bauer, Abigail Pitts, Krista Ruffini, and Dianne Whitmore Schanzenbach, “The Effect of Pandemic EBT on Measures of Food Hardship,” Brookings Institution, July 30, 2024. <https://www.brookings.edu/articles/the-effect-of-pandemic-ebt-on-measures-of-food-hardship/>.
 - ⁴ The Cherokee Nation and the Chickasaw Nation located in Oklahoma administered benefits in 2024. Oklahoma state did not participate in the program.
 - ⁵ Food and Nutrition Service, “SNAP Participation Rates by State, All Eligible People (FY 2018),” United States Department of Agriculture, accessed December 1, 2024, <https://www.fns.usda.gov/usamap>.
 - ⁶ Ilham Dehry and Sarah Knowles, “Few families receive the TANF cash assistance they’re eligible for,” *Urban Wire* (blog) Urban Institute, August 25, 2023, <https://www.urban.org/urban-wire/few-families-receive-tanf-cash-assistance-theyre-eligible>.
 - ⁷ This survey did not include representatives from implementing territories and tribal nations. Forthcoming research from Gupta and Gutierrez will highlight key implementation insights and challenges from tribal nations in Oklahoma.
 - ⁸ Joy Saha, “15 States Chose Not to Participate in Summer EBT for Hungry Kids. Here’s why,” *Salon*, February 13, 2024, <https://www.salon.com/2024/02/13/15-states-chose-not-to-participate-in-summer-ebt-for-hungry-kids-heres-why/>.
 - ⁹ Food and Nutrition Service, “SNAP – Waiver of the Interview Phaseout to Support Unwinding From the COVID-19 Public Health Emergency,” United States Department of Agriculture, March 26, 2024, <https://www.fns.usda.gov/snap/waiver-interview-phaseout-unwinding-covid19>.
 - ¹⁰ Food and Nutrition Service, “Agriculture Secretary Calls on States to Take Action to Improve SNAP Administration for Families in Need,” United States Department of Agriculture, February 8, 2024, <https://www.fns.usda.gov/news-item/fns-001.24>.
 - ¹¹ Food and Nutrition Service, “Summer EBT Technology Grants,” United States Department Agriculture, August 1, 2024, <https://www.fns.usda.gov/grant/summer-ebt-technology-grants>.

REFERENCES

- Anderson, Theresa, Baris Tezel, Poonam Gupta, and Elaine Waxman. 2023. *Summer Nutrition Program Preferences among Rural Households with Low Incomes: Insights from the 2023 Meals-to-You Summer Survey*. Washington DC: Urban Institute.
- Bernstein, Hamutal, Dulce Gonzalez, Michael Karpman, and Genevieve M. Kenney. 2024. *Mixed-Status Families and Immigrant Families with Children Continued Avoiding Safety Net Programs in 2023*. Washington DC: Urban Institute.
- Huang, Jin, Ellen Barndige, Youngmi Kim. 2015. “Children Receiving Free or Reduced-Price School Lunch Have Higher Food Insufficiency Rates in Summer.” *Journal of Nutrition* 145 (9): 2161–168. <https://pubmed.ncbi.nlm.nih.gov/26203095/>.
- Rabbitt, Matthew P., Madeline Reed-Jones, Laura J. Hales, & Michael P. Burke. 2024. *Household food security in the United States in 2023* (Report No. ERR-337). Washington, DC: US Department of Agriculture, Economic Research Service. <https://doi.org/10.32747/2024.8583175.ers>.
- Waxman, Elaine, Poonam Gupta, Eleanor Pratt, Matt Lyons, Chloe Green. 2021. *Documenting Pandemic EBT for the 2020–21 School Year*. Washington DC: Urban Institute.

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