

RESEARCH REPORT

Implementation Insights and Equity Considerations for Summer EBT in 2024

Perspectives from State SNAP Agencies

Poonam Gupta, Emily Gutierrez, Ariella Meltzer, and Baris Tezel

May 2025



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Acknowledgments

This report was funded by Healthy Eating Research, a national program of the Robert Wood Johnson Foundation, and conducted in close partnership with the American Public Human Services Association. We are grateful to them and to all our funders, who make it possible for Urban to advance its mission.

The views expressed are those of the authors and should not be attributed to the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute's funding principles is available at urban.org/fundingprinciples.

We are grateful to all the state agencies that participated in our survey and interviews, the partnership of the American Public Human Services Association, and the assistance of Chloe Green in distributing the survey and facilitating connections with states. The authors also gratefully acknowledge assistance from Elaine Waxman and thank Sujin Hong for careful editing.

Glossary

alternative income forms: Community Eligibility Provision (CEP) schools do not annually collect free and reduced-price (FRP) applications from students. Therefore, alternative income forms are designed to collect household income information and used to calculate funding and eligibility for other state programs. They could be used to determine Summer EBT eligibility, provided they contain enough information to make an income determination for the family. Beyond 2024, however, alternative income forms can only be used to determine Summer EBT eligibility if the form meets the minimum requirements for a Summer EBT application; otherwise, the form must be adjusted.

Community Eligibility Provision (CEP): The Community Eligibility Provision is a nonpricing meal service option for schools and school districts in low-income areas. It allows the nation's highest-poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without requiring household applications. Schools that adopt CEP are reimbursed using a formula based on the percentage of students categorically eligible for free meals due to their participation in other specific means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF).

direct certification: Under direct certification, children are determined eligible for free meals without the need for household applications by using data from other means-tested programs, such as SNAP, TANF, or Medicaid (depending on state guidelines).

local education agency (LEA): Local education agencies are local entities involved in education, including but not limited to school districts, county offices of education, direct-funded charter schools, and special education local plan area (SELPA).

Food and Nutrition Service (FNS): The Food and Nutrition Service, an agency of the US Department of Agriculture (USDA), works to end hunger and obesity through the administration of 16 federal nutrition assistance programs, including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), SNAP, and the National School Lunch Program (NSLP).

free and reduced-price lunch (FRPL): Under the NSLP, families complete a household income eligibility form. The forms help schools certify students as eligible for FRPL and, until recently, had the unintended benefit of providing a national measure of student poverty.

National School Lunch Program (NSLP): The National School Lunch Program is a federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. It

provides nutritionally balanced, low-cost or free lunches to children each school day. The program was established under the National School Lunch Act, signed by President Harry Truman in 1946.

SUN Meals-To-Go: In 2023, USDA permanently authorized SUN Meals To-Go, which is a noncongregate summer meals option that provides eligible children with nutritious, free meals to take off-site. Designed to improve access in rural or hard-to-reach areas, this program enables parents or guardians to pick up meals or have them delivered, reducing barriers like transportation or limited program availability.

plan for operations and management (POM): A plan for operations and management is a required annual submission by each state or tribal nation operating the Summer EBT program. It outlines how the program will be managed and administered, including a detailed budget and plan for reaching eligible children. USDA must approve the POM—either interim or final—for agencies to access federal funds covering 50 percent of administrative costs.

streamline certification: Streamline certification is a process that allows state SNAP agencies to automatically issue Summer EBT benefits to most eligible children without requiring an application. Eligibility is determined using existing data from programs such as SNAP, TANF, Food Distribution Program on Indian Reservations (FDPIR), Medicaid (in some states), and school records of children eligible for FRP meals.

Supplemental Nutrition Assistance Program (SNAP): The Supplemental Nutrition Assistance Program provides low-income individuals and families with monthly benefits to help purchase food and improve nutrition. It is the largest federal nutrition assistance program and plays a key role in reducing hunger and poverty.

Executive Summary

In 2024, the US Department of Agriculture (USDA) launched a new federal nutrition program, Summer Electronic Benefits Transfer (EBT), otherwise known as SUN Bucks. It provides grocery benefits to low-income families with children during summer months to support unmet need in summer food assistance programs. That year, 37 states, all 5 US territories, and 2 tribal nations opted in to the program, but unclear guidance and a limited runway created barriers to state implementation. Moreover, variation in implementation across the country left many families without access to the benefit. In this report, we examine states' take-up of the program, their experiences with implementation, and ways to improve the program for future administration; and assess the equity implications for populations disproportionately at risk for food insecurity between participating and nonparticipating states.

Methodology

This study was developed as a research partnership with the American Public Human Services Association. To understand states' experiences with Summer EBT, we conducted an online survey in Qualtrics of all state SNAP directors in May and June 2024. Forty-two state SNAP directors completed the survey, 33 of whom opted in to Summer EBT in 2024. We then conducted in-depth follow-up interviews with state SNAP directors who served as Summer EBT leads from seven states (five that implemented Summer EBT in 2024 and two that did not). Finally, we supplemented our implementation documentation by capturing the experiences of a small number of households receiving Summer EBT to understand how families interact with the program.

States' Experiences with Implementation

We document challenges that states faced to get the Summer EBT program off the ground and learnings gained in the first year of implementing the program in 2024. Some challenges stemmed from federally imposed constraints, while others resulted from differing state capacity and existing infrastructure, including the following:

- a lack of timely and clear guidance from the Food and Nutrition Service (FNS), which led to an extremely short time frame for states to develop and implement their Summer EBT plans

- insufficient administrative funding and timeliness of receiving funds for program operation, impacting states' ability to develop contracts and staff teams
- quality of interagency relationships among those that needed to be involved in the program, leading to undue burden on SNAP agencies and inefficient data processes
- limited staffing capacity and ability to hire and train new staff on a short time frame
- difficulty managing data infrastructure, especially given the degree of partnerships needed to collect data on student eligibility, low data quality, and lack of cooperation in data sharing
- difficulty developing application infrastructure and timely issuance of benefits

Variation in Take-Up and Implications for Equity

Some states' decisions to decline providing Summer EBT in 2024 may exacerbate food insecurity among households with low incomes that would otherwise be eligible for the benefit, which is especially concerning given elevated rates of food insecurity during the summer. Specifically, we find that differences in program availability may potentially exacerbate preexisting disparities, including in states with higher food insecurity among households with children; higher percentages of Black, Hispanic, and American Indian or Alaska Native children; and higher number of children living in rural counties.

Recommendations to Improve Implementation

Based on states' input, we have identified the following key recommendations for USDA to improve future rounds of implementation of Summer EBT:

- Provide clear guidance to states and approve plans in a timely manner.
- Provide additional support for states to develop data management systems.
- Offer guidance on how SNAP agencies and child nutrition agencies should work together.
- Continue allowing states to request flexibilities in program requirements.
- Consider providing a higher rate of match funding for the administrative costs of running Summer EBT, particularly in the first years of implementation.
- Require schools to share data with the state agency for the purposes of implementing Summer EBT to alleviate privacy concerns.

Introduction

In 2024, the US Department of Agriculture (USDA) launched a new federal nutrition program, Summer Electronic Benefits Transfer (EBT), otherwise known as SUN Bucks, that provides grocery benefits to low-income families with children during summer months. The goal of Summer EBT is to support unmet need in summer food assistance programs by offering families increased flexibility to purchase food at their own convenience. That year, 37 states, all 5 US territories, and 2 tribal nations opted in to the program.

For this study on 2024 Summer EBT, we partnered with the American Public Human Services Association. We divided our research into two phases:

1. Examine states' take-up of the program, their experiences with implementation, and ways to improve the program for future administration.
2. Assess the equity implications for populations disproportionately at risk for food insecurity between participating and nonparticipating states.

We addressed our research aims on implementation by conducting an online survey of state SNAP directors' experiences and interviewing select state program staff and participants. Early insights from our state survey are referenced throughout this report (Gupta et al. 2024). We then analyzed states' administrative and publicly available data to assess the equity implications of the variation in Summer EBT implementation across the country.

Need for Solutions to Address Summer Hunger

Childhood food insecurity rises during the summer months when children do not have access to school meals (Huang, Barnidge, and Kim 2015). In the past, USDA has addressed this issue by offering congregate, or in-person, meals at schools or in community locations during the summer. As of 2023, USDA authorized offering noncongregate, or grab-and-go, summer food options in rural areas. Although these summer meal programs help alleviate childhood food insecurity during the summer months, they face persistent challenges in reaching children for a variety of reasons, such as difficulty for parents or guardians to drive to a site twice a day for breakfast and lunch, parental work schedules, a general lack of transportation, and stigma (Miller 2016).¹ Despite the growing popularity of the grab-and-go model, which aims to mitigate some of these barriers, this option is only available in rural areas

without in-person meal services; therefore, these existing options are insufficient to address summer hunger for all children nationwide (Gutierrez et al. 2025).

Prior Implementation of Summer EBT and Pandemic EBT

The Summer Electronic Benefit Transfer for Children (SEBTC) demonstration program was first piloted by USDA in 2011 to create a proof of concept for the Summer EBT model in reducing summer child food insecurity.² Research has consistently shown that families appreciate the flexibility offered through a cash benefit like Summer EBT over in-person meal programs (Anderson et al. 2023; Nutter et al. 2024). The SEBTC pilot ran for 12 years and included ten states and three tribal nations. These states and tribal nations administered benefits either through the Supplemental Nutrition Assistance Program (SNAP) or Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and participated for different periods of time over the 12 years. Eligible households were randomly assigned to receive either \$30 or \$60 per child per month (\$90 or \$180 per summer) in each pilot's first year, and participating households were provided the higher benefit amount in the following years.

At the onset of the COVID-19 pandemic in spring 2020, states were exempt from continuing the pilot operation implementation and allowed to transition to implementing an emergency response form of the SEBTC demonstration, known as Pandemic Electronic Benefit Transfer (P-EBT), which was part of the US government's strategy to address the loss of school meals after widespread school closures.³ P-EBT was modeled similarly to SEBTC, where children who received free and reduced-price (FRP) school meals would be eligible to receive funds to use at SNAP-authorized retailers. The benefit amount varied significantly from the SEBTC demonstration years, however, as P-EBT was calculated based on school meal reimbursement rates. For example, P-EBT provided \$391 for the summer period in 2022.⁴

Evidence on the Impact of Summer EBT

Both the SEBTC pilot and the Pandemic EBT program have been found to reduce food hardship. Analyses of the Summer EBT pilot in 2013 found that the \$30 and \$60 options reduced the prevalence of very low food security, which is the most severe form of food insecurity—with the \$60 monthly benefit having the largest reduction. The \$60 benefit reduced household food insecurity by 20 percent, while the \$30 benefit had a weaker impact of 10 percent. Both benefit levels encouraged greater consumption of fruits and vegetables (USDA 2024). Pandemic EBT was found to have reduced food insufficiency among SNAP households by 28 percent in the 2020–21 school year (Bauer et al. 2020).

Permanent Summer EBT in 2024

In December 2022, Congress created a nationwide, permanent Summer EBT program through the Consolidated Appropriations Act of 2023, building on the SEBTC demonstration and Pandemic EBT models.⁵ In the permanent Summer EBT program, children may be enrolled automatically (1) if the child's household is already enrolled in programs such as SNAP, Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or sometimes Medicaid; or (2) if the child has been identified at their school as eligible for FRP meals.

If children are not automatically enrolled, the family may apply to receive the benefit via the state's Summer EBT application. This includes families with children attending Community Eligibility Provision (CEP) schools (the universal free-meal program) who are not enrolled in SNAP, TANF, FDPIR, or Medicaid. States that opt in to Summer EBT provide qualifying families with \$40 in grocery benefits per eligible child per month (a total of \$120 over three months, provided monthly or in a lump sum, depending on the state) to use at retailers that accept SNAP benefits. Tribal nations can also administer the program, but they must provide benefits via the WIC model (a prescribed food package or cash-value benefit).⁶ Tribal nations can serve families regardless of whether their states operate the program. For example, the state of Oklahoma did not participate in Summer EBT in 2024, yet the Cherokee Nation and the Chickasaw Nation administered benefits to tribal and nontribal children living in their service areas in summer 2024 (Gutierrez, Gupta, and Tezel 2025).

Motivations for the Study

Although Pandemic EBT provided many implementation lessons for states, this report is the first to thoroughly document how states experienced the rollout of the permanent Summer EBT program in its first summer. We document state implementation decisions surrounding program take-up and outline recommendations to inform the USDA about actions that could equip states with the resources needed for improved implementation. We also assess the extent to which states' decisions to participate lead to differences in access to summer nutrition across states' most vulnerable populations: students in rural areas with fewer retail food options and students from low-income families already at higher risk of food insecurity (FRAC 2018). We shed light on potential program improvements to better help states fight summer hunger.

Below we describe the methodology used to document state Summer EBT implementation experiences, then discuss key implementation findings, the equity implications amid uneven take-up, and lessons and consideration for future summers.

Implementation Assessment Methodology

Survey with State SNAP Directors

To understand states' experiences with Summer EBT, we conducted an online survey in Qualtrics of all state SNAP directors in May and June 2024. The survey asked questions about states' decisions to operate Summer EBT, the process of submitting their plans to the USDA Food and Nutrition Service (FNS), challenges with data collection and infrastructure, relationships with other agencies in the state, and how benefits were disbursed. The survey was developed in partnership with the American Public Human Services Association, who reviewed and provided comments, and was tested with a state SNAP director. Forty-two state SNAP directors completed the survey, 33 of whom opted in to Summer EBT in 2024.⁷ We conducted descriptive analyses of the findings, and responses were not weighted.

Interviews with State SNAP Directors

In the survey, state SNAP directors were asked if they were interested in participating in a follow-up interview. Among those who responded yes, we aimed to reach directors in states across a range of political affiliations and levels of implementation infrastructure to ensure we collected diverse perspectives on the challenges and best practices in implementing Summer EBT. We conducted in-depth follow-up interviews with directors that served as Summer EBT leads from seven states (five that implemented Summer EBT in 2024 and two that did not). In some cases, additional members from the Summer EBT implementing team joined the call. The interview focused on learning more about implementation processes and challenges, such as roles and relationships between state agencies, challenges with data management, and recommendations states had for policymakers to facilitate future implementation. We developed a qualitative coding schema to analyze the interviews and document key themes and sentiments that emerged during the interviews.

Interviews with Summer EBT Recipients

We supplemented our research by capturing the experiences of a small number of households receiving Summer EBT to understand how families interact with the program. The respondents were sourced

through sponsor agencies we interviewed in a companion study on noncongregate meal program implementation, where we asked participants about their experiences with all summer nutrition programs they received, including noncongregate meals and Summer EBT (Gutierrez et al. 2025). Through this joint effort, we interviewed eight Summer EBT participants across Louisiana, Oregon, and Virginia to learn more about the program experience from the recipients' perspective. Participants were offered a \$40 gift card for their time. The topics covered in these interviews were basic household information, general food access, use of Summer EBT benefits, and helpful summer nutrition resources. The responses were analyzed using a basic framework analysis.

States' Experiences with Implementation

Through 42 survey responses from state SNAP directors and interviews with 7 state Summer EBT teams, we learned about how the program was administered, challenges states faced, best practices employed, and lessons gained in the first year of implementing Summer EBT in 2024. Below, we summarize how states made decisions to implement the program based on the resources they had available, detail barriers they faced and their learnings, and, importantly, provide recommendations for USDA to improve implementation in future years.

Challenges with Federal-Level Constraints

For states that decided to opt in to Summer EBT in 2024, implementation was challenging for several reasons. We detail the challenges states faced getting the program off the ground, which were largely affected by federally imposed constraints and decisions. We then discuss how states made decisions around implementation as a result of these constraints, and how differing state capacity and infrastructure shaped program rolled out.

Timeliness and Clarity of Food and Nutrition Service Guidance

The most consistent feedback from states was the difficulty they had developing and implementing Summer EBT plans on a short time frame and with unclear guidance from FNS. Summer EBT was permanently authorized by Congress at the end of 2022, to begin implementation in summer 2024. Although congressional statute stipulates basic high-level requirements for implementation, it is up to FNS to interpret the statute and develop regulations. In the case of Summer EBT and its short window for implementation, Congress directed FNS to issue an interim final rule (IFR) within one year of the initial passage of the law. An IFR carries the same authority as a final rule, but provides a public comment period and typically is followed by a final rule later on. The IFR outlines official and detailed program regulations and requirements for implementation that states must follow when developing their plans. One year to develop an IFR for an entirely new program is generally considered a tight turnaround; however, states could not wait for it as they had to begin their own planning.

Thus, FNS worked quickly to release preliminary, relatively limited guidance and address common questions in June 2023, detailing basic information and core regulations on how states should be implementing their Summer EBT program (see box 1). FNS did not release the IFR until the last week of December 2023, meeting their statutory timeline. States were then required to declare their intent to implement by January 1, 2024, and submit their official written plan detailing how they would implement the program, known as the plan for operations and management (POM), by February 15, as required by law. States had to rely solely on the information provided in the preliminary guidance when deciding whether they would have the capacity to implement the new permanent Summer EBT program in 2024. This ongoing uncertainty around program rules, and the constant possibility that rules may change between rounds of guidance, made designing program administration difficult.

“Guidance is coming out at a snail’s pace, but this work [of planning and implementing Summer EBT] is going much faster.”

– State SNAP administrator

BOX 1

Timeline of 2024 Summer EBT Guidance and Implementation

December 29, 2022: Congress passes omnibus bill permanently authorizing Summer EBT nationwide beginning in Summer 2024.

June 7, 2023: FNS releases first round of program guidance to states.

Summer 2023: Last summer that Pandemic EBT was in operation.

December 29, 2023: USDA publishes interim final rule for Summer EBT program, outlining its processes and requirements for state administrators.

January 1, 2024: Deadline for states to submit their intent to implement Summer EBT in 2024 to USDA.

February 15, 2024: Deadline for states to submit their plan for operations and management (POM) to USDA.

August 15, 2024: Deadline for states to submit their interim POM for Summer EBT in 2025 to USDA.

Source: US Department of Agriculture, “SUN Bucks (Summer EBT) Implementation Toolkit,” last updated March 31, 2025, <https://www.fns.usda.gov/summer/sunbucks/implementing-agency/toolkit>.

In their POMs, states were required to submit detailed information on the estimated number of children that Summer EBT would serve, how benefits would be provided, and the processes for claims procedures and avoiding duplicate benefits through streamline certification, among other information. The February 15 deadline meant that states had roughly six weeks to establish a complex and detailed plan for implementing an entirely new federal nutrition program.

Furthermore, writing the plan was difficult because of the many differences in program rules between Summer EBT and Pandemic EBT. Although both programs had some similar features, they had several core differences, most notably in terms of funding structure and benefit eligibility (see table 1). Although some states found that prior experience with Pandemic EBT helped them understand what to expect with Summer EBT and were able to apply and adapt some of their learnings from that program, many were unable to carry over systems they had developed for Pandemic EBT. The Pandemic EBT program had been hastily assembled in the early months of school closures, and as a result, states had not typically established the necessary infrastructure to run a permanent program.

TABLE 1
Key Differences between Summer EBT and Pandemic EBT

	Summer EBT	Pandemic EBT	Key difference
Administrative funding	States receive 50 percent federal funding match.	States received 100 percent federal funding match.	Summer EBT has a lower federal match.
Eligibility for direct issuance	Students already certified or able to be certified for FRP meal programs, and students in special provision (CEP) schools that submit alternative income forms (2024 only)	All eligible children, including those attending special provision (CEP) schools	Children in special provision (CEP) schools cannot automatically receive Summer EBT.
Application requirement	Required statewide, including for students in special provision (CEP) schools	Optional	Application requirement for Summer EBT increases administrative burden.

Sources: US Department of Agriculture; Code for America and No Kid Hungry, *How to Implement a Human-Centered Summer EBT Program* (Oakland, CA: Code for America, 2024), <https://codeforamerica.org/resources/summer-ebt-playbook/>.

Notes: CEP = Community Eligibility Provision; EBT = electronic benefit transfer; FRP = free and reduced price.

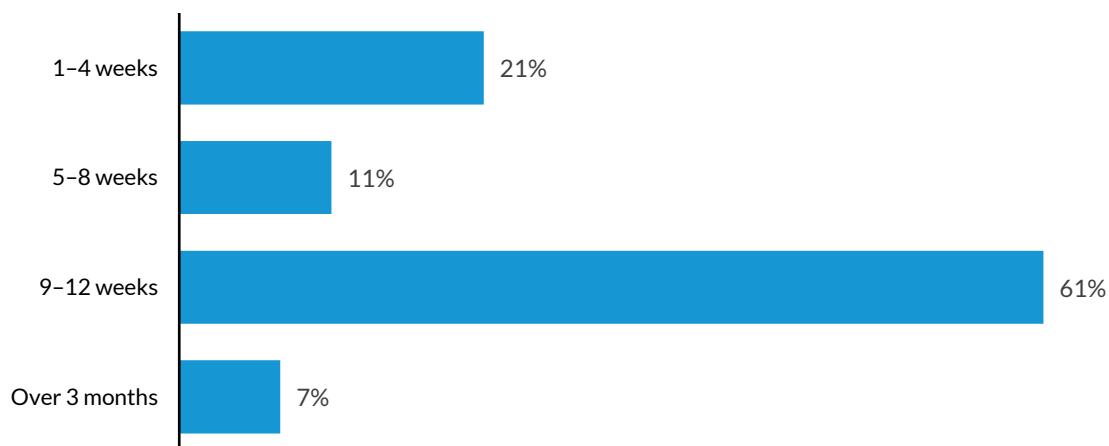
Overall, interviewees felt that they did not have sufficient clarity when developing their state POM for Summer EBT and were often left to guess what would or would not be acceptable, which ultimately resulted in delayed plan approval. One state SNAP administrator noted that, due to the loosely defined regulations, especially compared with other benefit programs, they were forced to make difficult implementation decisions on their own. For example, states had to decide who to issue benefits to (e.g.,

the head of household or each eligible child individually), weighing the increased costs associated with multiple cards and the potential lack of accuracy in figuring out the head of household. Moreover, to distribute benefits on time, states had to start preparing immediately, including getting contracts in place with external vendors (often used by states for certain functions like electronic benefit card issuance), building data management systems, and other key tasks—all of which required additional clarity and guidance.

Obtaining Plan Approval

As noted in box 1, states had to confirm their intent to implement Summer EBT in January 2024 and submit their final plans to FNS six weeks later (by February 15) for review and approval. FNS had stated that plan approval was critical to expediting the implementation process, and its goal was to provide all states with initial plan feedback within 30 days or less of submission. We find that FNS was successful in meeting this goal. Survey respondents noted that FNS was quick to provide initial feedback on plans, with the majority of respondents (90 percent) stating they received first round of feedback less than four weeks after submission. However, most states had to iterate through more than one round of feedback, and thus final approval took longer for some states. Two out of five survey respondents reported waiting over three months to receive final FNS approval (figure 1). In an interview, one state reported needing to go through three iterations of their plan with FNS before receiving approval.

FIGURE 1
Turnaround Times for States to Receive FNS Approval after Initial Plan Submission



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Source: Urban Institute survey fielded May–June 2024.

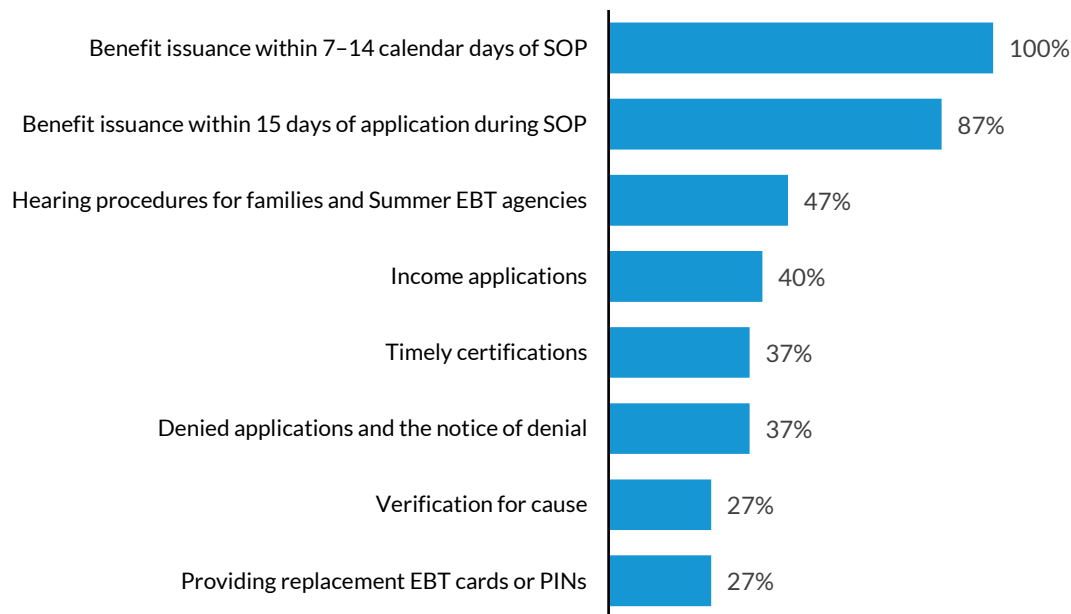
Notes: FNS = Food and Nutrition Service. Respondents were asked, “How long after your initial Summer EBT plan submission did it take to get approved by FNS?” N = 31 respondents answered this survey question.

Only 10 percent of states, however, reported the plan approval process was difficult. Many interviewees remarked that plan approval was relatively straightforward, with one state saying the process was much simpler than for Pandemic EBT. Another interviewee attributed their efficient approval process to the fact that the guidance was flexible, allowing them to closely align implementation details with other existing policy processes in the state, such as processes for SNAP. One state interviewee highlighted their state's detailed and advanced preparation as a best practice to ensure quick plan approval, noting, "We didn't wait until submitting [our plan] to get on the phone with [FNS] and ask questions. We asked specifically for office hours. This made the approval process for us go fairly quickly. [FNS was] surprised at how prepared we were."

One unexpected challenge during the plan approval process was the FNS requirement for states to submit waivers to obtain the flexibility they needed to implement the program. States were not informed of these waivers during their initial plan submission, and were only alerted by FNS during the first round of plan revisions. Some of these waivers were instrumental, especially around issuance timelines. All survey respondents requested to waive the requirement to issue benefits within 7 to 14 calendar days of the start of the summer, and many (87 percent) requested to waive the requirement to issue benefits to students that applied within 15 days of application (figure 2). Although the intent of this disbursement requirement was important to ensure children did not experience a gap between school meals and summer benefits, these waivers were critical, as the complexity of the program and short timeline made it unrealistic for states to implement the program (see the "Benefit Issuance to Families" section below for further discussion on challenges in benefit disbursement). State interviewees expressed they would like to see these waivers and flexibilities as semipermanent features in future years. One interviewee stated it would be helpful for FNS to employ maximum flexibility for at least another 5 years, citing that FNS has not had a new permanent federal nutrition program for over 50 years and states need time to figure out what is necessary to effectively implement the program.

FIGURE 2

Waivers Requested by States in Summer 2024



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Source: Urban Institute survey fielded May-June 2024.

Notes: EBT = electronic benefit transfer; PIN = personal identification number; SOP = summer operational period. “Income applications” refers to the requirement for a state to notify eligible households of a child’s approved status within 15 operational days of receipt of a completed application. “Verification for cause” refers to the requirement for a state to verify questionable applications on a case-by-case basis and to complete the verification within 30 days of receipt of the application. Respondents were asked, “Please select which waivers you submitted for 2024.” N = 30 respondents answered this survey question.

Insufficient Funding and Timeliness of Receiving Funds for Program Operation

Many states faced challenges with having sufficient funding to effectively run their Summer EBT programs. State agencies are required to estimate the amount of administrative funding needed to implement the program, which incorporates all expenses outside the benefit itself, including any permanent or temporary hiring and staffing costs; pass-through funds to other state or local agencies, if needed; developing data systems; and bringing on contractors to support key tasks, such as data management, benefit dissemination, and customer service, among others. However, Congressional statute provides that state agencies can only receive a 50 percent federal funding match on administrative costs, which was a marked departure from USDA covering 100 percent of administrative costs for Pandemic EBT (see table 1 above).⁸

One critical hurdle for states was the timeline for obtaining the required match funding; states had to attest that they had secured their 50 percent match in the plan submitted to FNS in mid-February. In

state interviews, some noted the challenges of aligning the timeline for submitting a plan with their state legislature’s budget cycle, which is needed to determine the availability of funds. Two interviewed states could not implement Summer EBT at all in 2024, because their respective state legislatures met on a different calendar cycle and were unable to approve funding. Another interviewed state expressed that the only reason they were able to implement Summer EBT was because their state legislature funding timing aligned well with the timing for the program.

States that were able to secure funding described the timeline for carrying out necessary processes as a challenge. States often need to put together contracts with key external vendors in advance, which is difficult to do without all the funding in hand. But states did not receive the full amount of their administrative funding match until their plans were approved and could not draw on federal food funds. Some interviewed states expressed difficulty with securing contracts with EBT vendors to disburse benefits. Because all states work primarily with one of two EBT vendors in the country that process and issue cards to families, the vendors experienced an influx of card requests. Furthermore, interviewed states expressed concerns about EBT vendor pricing practices. One interviewed SNAP administrator described an extensive back and forth with their vendor that slowed down implementation.

“[The vendor] really dragged their feet on how much money they would charge us. It felt like a game, and it made it hard to know how much money they needed. They made it seem like it would be cheaper this summer [2025], but we still don’t have an official cost.”

— State SNAP administrator

In addition to the challenging timeline for receiving funds, interviewees emphasized that a 50 percent funding match was insufficient to cover the substantial start-up costs associated with implementing a new program, including staffing and significant technology infrastructure investments (see the “Staffing Capacity Limitations” and “Managing Data Collection and Data Quality” sections below for more information). Overall, our interviews with states suggested that receiving only a 50 percent match for administrative funds is untenable to effectively develop and operate an entirely new program, especially in the first year.

Barriers to Program Adoption

These federal constraints were not only challenges to states that opted in to Summer EBT, but also the most often cited barriers to implementation for states that did not opt in. Of the 42 states that responded to our survey, 9 states said they did not implement the program in 2024. When we asked which factors contributed to their decision, the top factors included an inability to meet state match requirements (88 percent) and late or insufficient guidance from FNS (75 percent). State-level political will was a factor as well, with half of the surveyed states citing that they did not opt in because of differences in policy priorities.⁹

States' Implementation Decisions and Internal Challenges

In addition to delays, lack of clarity in federal guidance, and lack of sufficient administrative funding, states contended with various internal issues, such as complex relationships with other state agencies, varying levels of staffing capacity, and different degrees of data management infrastructure. These factors all shaped states' ability to get the program off the ground quickly and effectively—and issue benefits to families—during summer 2024.

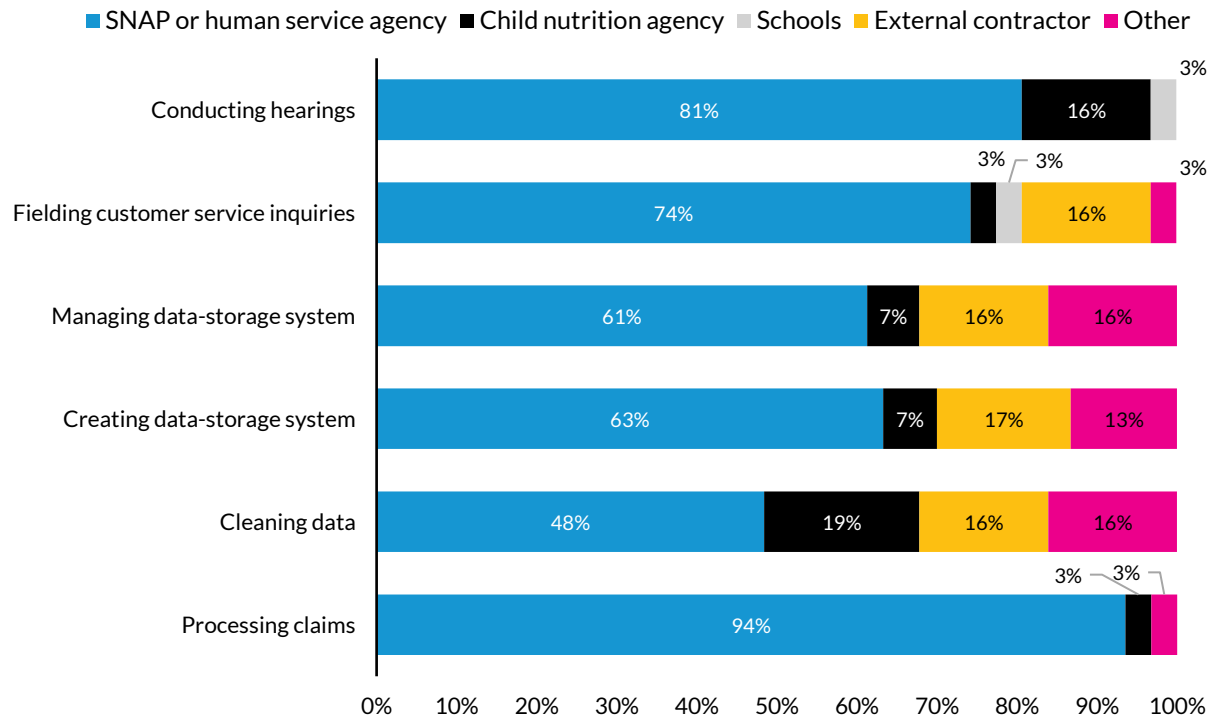
Challenges with Agency Relationships

A key factor affecting states' ability to effectively implement Summer EBT was the quality of their relationships with other state agencies that needed to be involved in the program. Summer EBT, unlike most other federal nutrition programs, requires extensive partnerships with other agencies. For example, both state SNAP agencies and state child nutrition agencies must contribute data to determine student eligibility for the program. SNAP agencies traditionally house or have access to data on families receiving SNAP, TANF, FDPIR, and Medicaid. In some cases, however, these data are housed by other state agencies (or, in the case of FDPIR data, housed by tribal nations) with whom SNAP agencies must partner to access the data. Child nutrition agencies collect data on students using FRP meals—another factor that determines Summer EBT eligibility—but they typically do not maintain all the information and data that is necessary to issue Summer EBT benefits and monitor program integrity.

Although SNAP agencies are not required to lead Summer EBT implementation, a large majority of them choose to do so, and were thus in charge of coordinating the program. In 2024, only eight states

had different agencies lead the program, such as child nutrition agencies or state departments of education.¹⁰ SNAP agencies noted they felt primarily responsible for running the program despite the expectation of partnerships with child nutrition agencies. This was the case even among states where the SNAP agency was not listed as the lead. According to our survey, state SNAP directors were primarily responsible for a wide range of implementation activities, including creating (63 percent) and managing (61 percent) data systems, fielding customer service inquiries (74 percent), processing customer claims (94 percent), and conducting hearings for customer disputes (81 percent) (figure 3).

FIGURE 3
Entity Responsible for a Given Implementation Activity



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Source: Urban Institute survey fielded May–June 2024.

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

Interviewed states (the majority of which had their SNAP agency designated as the lead Summer EBT agency) expressed frustrations with having the main burden of program implementation fall on SNAP agencies and not evenly splitting responsibilities with other state agencies. One state interviewee felt that the lead agency took on an unfair burden, stating, “Because we are the lead agency ... it felt like all the pressure is on us if things don’t work.” Another state SNAP administrator felt it was unfair to

automatically assume the SNAP agency would lead because Summer EBT was issued on an EBT card, citing that they do not lead WIC, which also uses an EBT card. The administrator further explained that their state education department felt like a more natural fit to lead, stating, “What has caused some of this friction between us and [the state department of education] is why we were shouldering all the costs for Summer EBT... it is a national lunch program. Just because it is issued on an EBT program [doesn’t mean it’s similar to] a SNAP benefit.... [The state department of education has] to work with the schools. That’s not anything we do in the SNAP world. It belongs to them, and we are just a partner agency to issue the benefit.”

On the other hand, some SNAP agencies felt burdened by the need to coordinate with other partners in the state and expressed that it would be easier to run Summer EBT on their own. One interviewed SNAP administrator noted they want to work toward limiting the involvement of their state department of education in the future, stating, “It is a lot easier to administer a program on your own.... It just is. [In] no other benefit program do we have to partner with another group in order to do it.... It’s tough.” The administrator further explained the hardship of multiple agencies relying on each other and the inefficiencies created by different entities not having access to the other’s data, stating, “Like right now, if a family files a fair hearing, the eligibility worker ... can’t see the department of education’s record because they don’t have FERPA [Family Educational Rights and Privacy Act]¹¹ training. So they have to rely on me and my staff to pull data for them and give it to them.”

Staffing Capacity Limitations

In addition to managing relationships with other agencies, SNAP agencies noted that it was challenging to run a new program with the same and often limited number of staff that handle existing benefit programs. One interviewed SNAP administrator echoed this high workload, stating, “Maybe somebody can let our leadership know how resource intensive it is.... We had to run this program with the same staff that we have for the rest of the year. Three part-time contractors.... A whole program that we have to run with the same people ... the intensity and permanence of this program needs proper staffing.”

Other states coped with the lack of staffing by hiring additional external vendors. One state that was unable to implement Summer EBT in 2024 responded that in future years they would have vendors set up the application process, receive and clean application files, and house the database and website. They further explained that without this additional capacity, they would have a hard time meeting program requirements.

In addition to handling new Summer EBT responsibilities in a short amount of time, state SNAP staff were grappling with increased responsibilities related to SNAP in 2024 and the unwinding of other pandemic-era policies like Medicaid continuous coverage protection.¹² As the COVID-19 Public Health Emergency (PHE) expired in 2022, SNAP agencies prepared to return to regular SNAP operations and transition from pandemic-era issuance methods, application approvals, and reporting requirements.¹³ During this unwinding, Congress placed increased pressure on states to improve error rates in SNAP administration—rates that assess how much a state has overpaid or underpaid SNAP benefits, which were exacerbated by the pandemic (Rosenbaum and Bergh 2024). For many states, Summer EBT preparation ramped up in January 2024, the same time as these additional changes and responsibilities. One interviewed SNAP administrator said, “[We] had to find money for two years at a time when our own department was doing unwinding work for Medicaid. Our bandwidth to do this was pretty stretched.”

Managing Data Collection and Data Quality

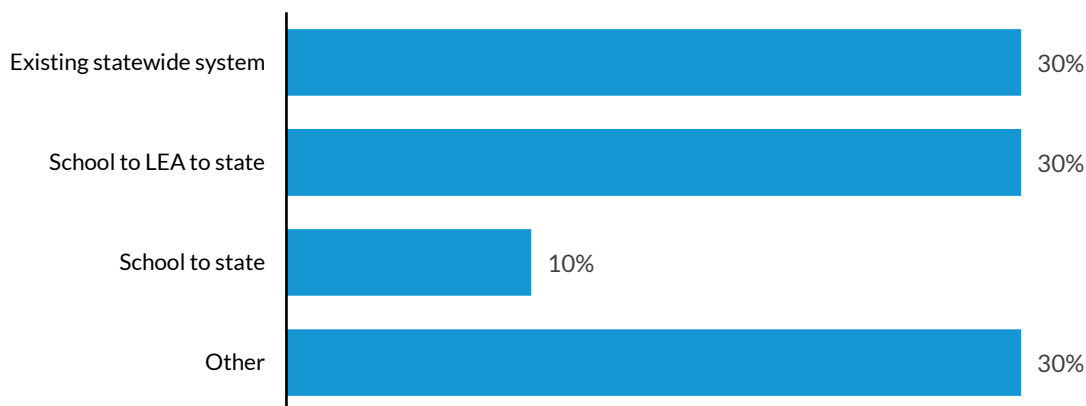
Managing data infrastructure to support a new program proved to be a significant challenge for states, given the degree of partnerships required to collect data from different entities to establish eligibility as well as the complexity of cleaning the data. Households could receive Summer EBT benefits automatically if they were deemed eligible by the state via a process known as streamline certification. Students who could not be identified through this process needed to apply via the state application process (see “Collecting Applications from Student Households” section below for more information). To identify eligible students via streamline certification, states needed to confirm the following:

- **Whether the child had been directly certified for FRP school meals via household participation in a public assistance program.** To do so, state agencies need to use their own data (or sometimes partner with other human services agencies in the state) to identify enrolled children receiving SNAP, TANF, FDPIR, or, in certain states, Medicaid.
 - » A child is considered categorically eligible if they were participating in Head Start or were eligible because of their homeless, foster, migrant, or runaway status.
- **Whether the child was deemed eligible for FRP meals via income application during the school year.** To do so, lead agencies need to obtain rosters of enrolled children certified for FRP meals during the school year from either the state’s child nutrition agency or department of education—or, in some cases, directly from schools or school districts.

State SNAP agencies generally did not have issues procuring direct certification or categorical eligibility data, as these are data they work with often. One interviewed state SNAP administrator, for example, said they have a singular, integrated system that houses their SNAP, TANF, Medicaid, child support, child care, and foster system data all in one place. However, procuring data on other enrolled students eligible for FRP school meals was challenging. Only 30 percent of state SNAP agency survey respondents were able to use an existing statewide database to collect this data; the remaining states had to work directly with schools and local education agencies (LEAs, which are comparable to school districts), to obtain this data, which was time and energy consuming for all involved parties (figure 4). The 30 percent of respondents that selected “Other” methods largely used a combination of strategies, such as combining data from their statewide system and using alternative income forms (existing forms collected by CEP schools to determine student household income and eligibility), which is a flexibility only available in 2024. But local entities did not always have the capacity to create and send these data files. One interviewed state explained, “Even if we have a great working relationship [with the child nutrition agency], it doesn’t mean people on the ground are invested. It’s a lot of manual work at the LEA level.” States that had a statewide system still had to do some manual data collection. One interviewed state noted having to manually collect data from their state’s Bureau of Indian Education schools, as they do not participate in their existing statewide system.

FIGURE 4

State-Reported Methods of Collecting FRP List Data in Summer 2024



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Source: Urban Institute survey fielded May–June 2024.

Notes: FRP = free and reduced price; LEA = local education agency. Respondents were asked, “How will you collect NSLP/SBP [National School Lunch Program/School Breakfast Program] free and reduced-price list data?” N = 30 respondents answered this survey question. Respondents could only select one option; those that selected “Other” methods largely used a combination of strategies, such as combining data from their statewide system and using alternative income forms.

One unanticipated challenge was the lack of cooperation in data sharing from schools and LEAs because of concerns about Family Educational Rights and Privacy Act (FERPA) requirements. Per FERPA rules, schools must protect student data, including names and addresses, which are critical data points in administering Summer EBT. Some survey respondents added that they anticipated having issues with getting data from schools because of potential concerns related to FERPA. One interviewed state explained their frustration over not being able to obtain the necessary data, stating, “When federal laws don’t give companion legislation to the education agency that gives very clear authority, we can’t do much or get any data.... FNS is good about getting some clarifications out there, but some school districts still argued with us.” In January 2025, the US Department of Education shared an official memorandum to school officials across the US explaining that sharing student data with state agencies does not violate FERPA. However, it remains to be seen how effective this clarification will be for summer 2025.¹⁴

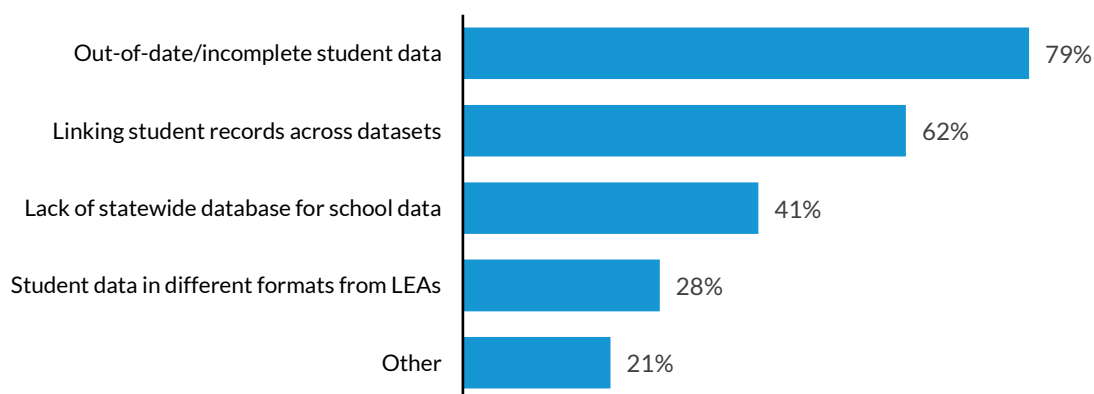
Notably, Summer EBT participating states will be required by statute to develop a statewide database for school enrollment and FRP lunch eligibility (via both direct certification and application) by 2025, as part of an effort by Congress to streamline public assistance eligibility data. Interviewed states expressed hesitancy about being able to achieve this in such a short time frame. One interviewed state reported that while they may have a system they can build on to comply with this requirement, it will be difficult to get all their LEAs on board in time.

In addition to being difficult to collect, school data were also challenging to work with. Although program eligibility data, such as for SNAP and TANF, are collected for the purpose of distributing benefits, schools do not collect household data for the purpose of delivering Summer EBT. As a result, household data were often missing or had outdated critical information, such as a child’s current mailing address. The majority of survey respondents (79 percent) reported dealing with, or anticipating dealing with, out-of-date or incomplete student data to deliver benefits; and three in five respondents (62 percent) struggled, or anticipated struggling, with linking this data to their agency’s existing datasets (figure 5). Almost all interviewed states echoed this sentiment, with addresses being the information most commonly out of date. Another interviewee commented that sometimes student nicknames were used instead of full names, which added to challenges in correctly identifying students and created a substantial workload in data cleaning.

“People/data move around a lot. Forms get submitted early in the year, and a lot of time passes in between that and when we administer the program. Getting updated addresses was a challenge.”

– State SNAP administrator

FIGURE 5
Challenges with Aggregating or Cleaning School Data



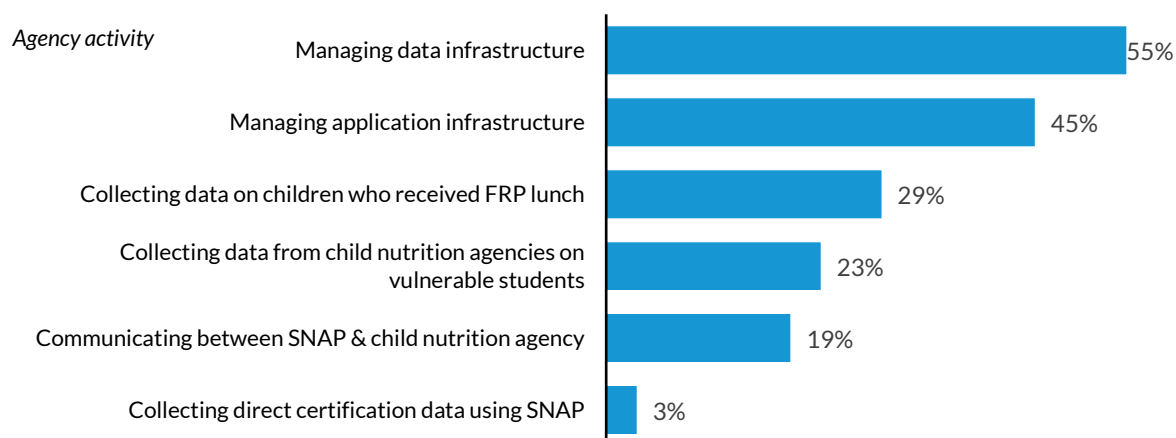
URBAN INSTITUTE

Source: Urban Institute survey fielded May–June 2024.

Notes: LEA = local education agency. Respondents were asked, “Did you face, or anticipating facing, any of the following challenges in aggregating or cleaning NSLP/SBP [National School Lunch Program/School Breakfast Program] free and reduced-price list data? Select all that apply.” N = 29 respondents answered this survey question.

This need for significant data management strained agency staffing capacity and its ability to run the program effectively. When asked about key challenges in data processes, about half of respondents (55 percent) said creating the necessary data infrastructure to run the program was “Difficult” or “Very difficult” (figure 6). Interviewed states echoed these challenges and seemed to agree with the sentiment that a shared portal for data management would be helpful. One interviewed state especially emphasized the importance of having a customer portal that enables customers to update their information in real time, making the data the states collect more manageable and usable. The interviewee said that while they were not able to put one together for summer 2024, they hope to use the FNS technology grant to develop one for 2025.¹⁵

FIGURE 6
Reported Difficulties with Managing the Data Infrastructure Needed to Implement Summer EBT



URBAN INSTITUTE

Source: Urban Institute survey fielded May–June 2024.

Notes: EBT = electronic benefit transfer; FRP = free and reduced price; SNAP = Supplemental Nutrition Assistance Program. “Vulnerable students” refer to foster care, homeless, migrant, or runaway students. Respondents were 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.” N = 54 respondents answered “Difficult” or “Very difficult” to each activity listed.

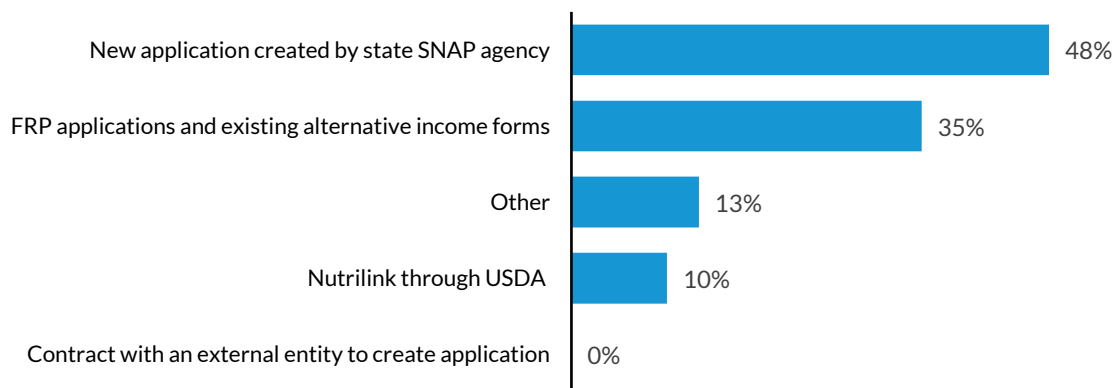
Collecting Applications from Student Households

Although states could, on average, serve the majority of eligible students via streamline certification, many households still had to apply to receive Summer EBT. Thirty-two state survey respondents estimated that they would be able to serve an average of 75 percent of eligible students in their state via streamline certification, though this number varies significantly depending on the number of CEP schools in the state (from as low as 33 percent to as high as 96 percent; data not shown). In CEP schools, universal free meals are provided to all students based on direct certification rates for the surrounding

community. As a result, these schools do not collect the traditional FRP meal application during the school year. Students in CEP schools may be individually eligible for the FRP meal program but are not automatically enrolled via direct certification, and so they must enroll using the Summer EBT application. This requirement was a notable departure from the prior Pandemic EBT model, in which all students in CEP schools were automatically issued benefits. Furthermore, direct certification does not necessarily identify all eligible children, as not all income-eligible families apply for the benefits they are eligible to receive for a variety of reasons, including stigma and uncertainties for mixed-status families.¹⁶

States were required to implement an application process for Summer EBT, though the approach may vary by state. Nearly half of survey respondents (48 percent) developed a new application for Summer EBT, while 35 percent relied on existing school meal forms or alternative income forms used by schools that do not collect FRP meal forms (figure 7). Only a few (10 percent) states used the application infrastructure offered by USDA, through a partnership USDA created with Nutralink, that was available to states temporarily at no cost. The majority of states made their application available on mobile or online (87 percent), while about 60 percent offered a downloadable paper application that can be submitted in person (data not shown).

FIGURE 7
Summer EBT Application Processes Used by States in Summer 2024



URBAN INSTITUTE

Source: Urban Institute survey fielded May–June 2024.

Notes: EBT = electronic benefit transfer; LEA = local education agency; NSLP/SBP = National School Lunch Program/School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; USDA = US Department of Agriculture. Respondents were asked, “What application process will you implement in summer 2024? Select all that apply.” N = 31 respondents answered this survey question.

The short timeline for implementation made creating an entirely new application difficult, and it ultimately resulted in applications that did not have all the necessary information. One SNAP director

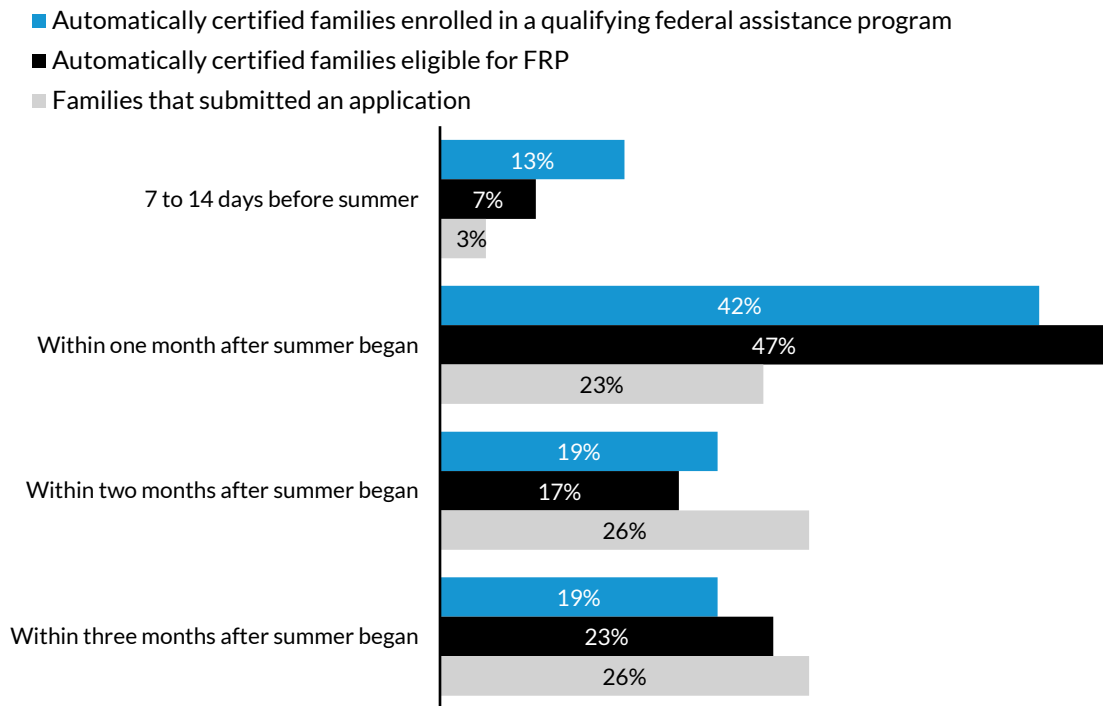
remarked, “When we finally got the application into production, it was rushed and sloppy with no filters. The [education] department couldn’t automate the application process, so it was very time consuming.” Additionally, some states felt their applications did not have the reach they anticipated. One interviewee noted that they only received about 5,000 applications for summer 2024 when they expected roughly 30,000. The interviewee attributed this to confusion among families who had automatically received Pandemic EBT benefits in the past without needing to apply. Other states, however, had a smoother process with their applications in 2024. One interviewed state remarked that they were well-prepared for the surge of applications they received and did not experience issues with their call center. Finally, some interviewed states expressed concern that they expect to receive significantly more applications in 2025 than they did in 2024, likely because of greater awareness of the program among families.

Benefit Issuance to Families

Data collection and cleaning challenges led to states issuing benefits on significantly different timelines. The biggest challenge for states was complying with the requirement to issue benefits to streamline-certified students within 7–14 days before the start of the summer operational period and to students who were deemed eligible through an application process no more than 14 days after application submission. As stated earlier, all surveyed states applied to waive this requirement in 2024. Issuing benefits to streamline-certified students was ultimately easier for states, given that their information comes from existing data, as opposed to having to review and then approve or deny individual applications. Most surveyed states anticipated issuing benefits to streamline-certified students later than the required timeline. Almost half of states (42 percent) said they planned to distribute benefits to streamline-certified students within one month of the start of the summer, and about a quarter of respondents (23 percent) predicted they would issue benefits to families who had to apply to the program within one month of the start of the summer. Notably, over a quarter of states (26 percent) anticipated issuing benefits to families who applied within three months after the summer began, implying a potentially significant gap between when families needed the benefit and when it was received (figure 8).

FIGURE 8

State Predictions of Timeline for Issuing 2024 Summer EBT Benefits, by Type of Household Eligibility



URBAN INSTITUTE

Source: Urban Institute survey fielded May–June 2024.

Notes: EBT = electronic benefit transfer; FRP = free and reduced price. Respondents were asked, “When do you expect to be able to distribute your first issuance in the following groups?” N= 31 respondents answered this survey question. 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.

One state originally planned to issue streamline certification benefits in mid-May, but was delayed because the state department of education did not have the capacity to provide cleaned data earlier than mid-June. An administrator explained, “The 7 to 14 day thing is ... unrealistic. This is a very tough provision to implement, period. For us, the end of the school year fell [on] the ... third week of May.... In order to issue mid-May, we would have had to have the data three weeks prior for cleaning. That would have been almost mid-April.” Issuing benefits in mid-May would have been especially difficult given the condensed time frame states were operating in 2024.

Another state mentioned that issuing benefits was not as much of a problem as receiving cards that had the benefits, as they could not guarantee that benefits would be on the cards when families received them because of mismatched timelines between when cards were mailed and when EBT vendors loaded the benefits. Some states, however, did not have this problem, with one state interviewee explaining that they fought to make backup plans and get other departments involved to

issue benefits on time. The interviewee further explained that issuing on existing cards, rather than on new cards, aided in timely issuance. Vendor capacity also contributed to getting cards mailed on time; with a majority of states across the country putting in requests for additional cards, vendors had to balance getting cards out on time for everyone.

Promptly providing Summer EBT benefits is essential to achieving the program's goal of reducing food insecurity during the summer. This is particularly important for families who are not streamline certified through other benefit programs, as they may have limited access to other forms of assistance.

Reaching Families

States employed a variety of outreach and communication methods to inform families about their eligibility for Summer EBT benefits. However, challenges such as lack of internet access, rurality, and available budget and staffing capacity affected how well they were able to reach families, especially those that needed to submit an application.

Most states used multiple communication channels to notify streamline certified families that they would be receiving Summer EBT, with letters mailed to homes (80 percent) and social media announcements (63 percent) being the most common methods. Less frequently, states used emails (30 percent), phone calls (40 percent), and text messages (40 percent). Some states also explored alternative methods, such as press releases, partnerships with community organizations, printed flyers, and informational videos. For families who needed to apply, the majority of states sent communications through multiple entities, including SNAP agencies (94 percent), state departments of education or child nutrition agencies (97 percent), and community partners (94 percent).

One key challenge to messaging identified by interviewed SNAP agencies involved confusion among participants between Pandemic EBT and the new Summer EBT. The change in name, in addition to new application requirements for those in CEP schools, made it difficult for participants to recognize the program. One participant interviewee noted that they did not receive their benefits until October because they were not aware they had to apply. They thought their child's school already had the necessary information for them to receive the benefit, as was the case with Pandemic EBT.

Another key challenge identified by interviewed SNAP agencies was reaching families in rural areas, particularly those without reliable internet access. Many agencies acknowledged the need for more creative outreach strategies in future years. One state emphasized the difficulty of connecting

with families in remote mountain areas and highlighted plans to increase in-person outreach through local events, such as state and community fairs.

“We absolutely miss the mark when it comes to getting kids in isolated mountain areas that don’t have Wi-Fi. We have many places in our state without internet access. Next time, we’re considering outreach at state fairs, local community fairs, and pop-up events, distributing paper applications and meeting families where they are.”

– State SNAP administrator

Ensuring effective outreach to all eligible families, especially those in rural and underserved communities, is crucial to maximizing student access to Summer EBT benefits and reducing food insecurity. One interviewed state emphasized their efforts to engage diverse populations, noting that they translated outreach materials into 18 languages and worked with tribal liaisons to inform Native American communities.

Variation in Take-Up and Implications for Equity

As documented above, the federally available Summer EBT program was challenging to implement. The complexity of the program, as well as lack of political will in some cases, was a major barrier to take-up. Regardless of the reasons, some states' decision to decline providing Summer EBT in 2024 may exacerbate food insecurity among households with low incomes that would otherwise be eligible for the benefit, especially given elevated rates of food insecurity during the summer (Nord and Romig 2007).

A lack of take-up among states may increase inequities in food hardship during the summer, especially for populations already at high risk, such as people living in rural areas and households of color (Odoms-Young and Bruce 2018; Nord and Romig 2007).¹⁷ Black and Hispanic adults have long experienced food insecurity at much higher rates than white adults, with these gaps not only continuing but widening during the COVID-19 pandemic (Martinchek et al. 2023; Odoms-Young and Bruce 2018). Furthermore, while poverty and unemployment are key drivers of food insecurity, the consequences of structural racism have been linked to food insecurity independent of poverty and socioeconomic status (Bowen, Elliott, and Hardison-Moody 2021). There are fewer data on other racial and ethnic groups, but studies show persistently high rates of food insecurity among Native Americans and Native Hawaiian and Pacific Islander people (Long et al. 2020; Nikolaus et al. 2022). Households in rural areas also consistently report higher rates of food insecurity, compared with households in metropolitan or urban areas (Rabbitt et al. 2024).

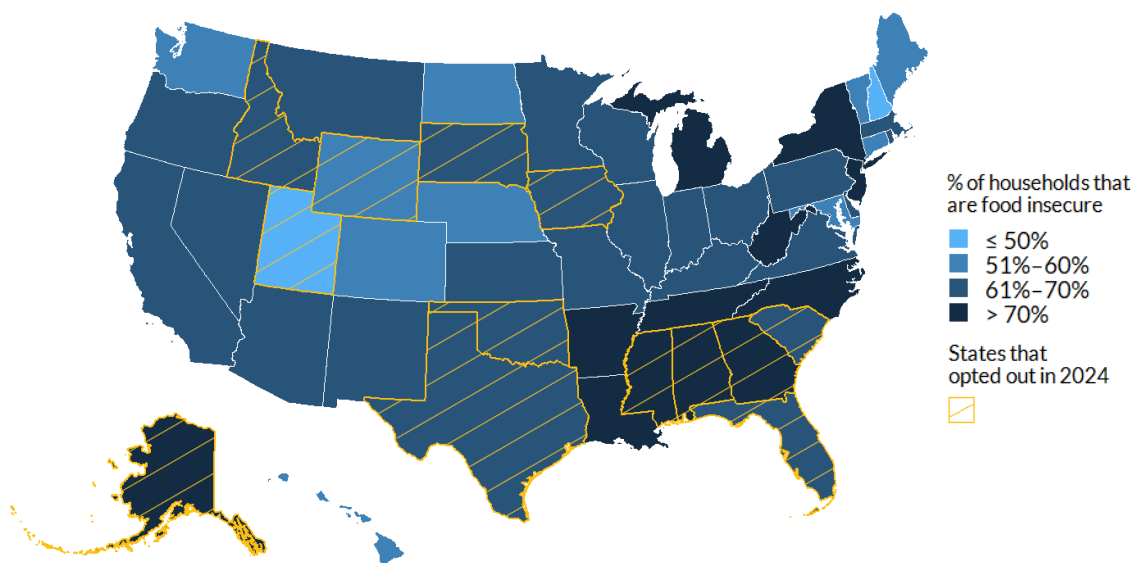
Below, we document the differences in food insecurity between states that implemented Summer EBT and those that did not in 2024. We discuss how differences in program availability may potentially exacerbate preexisting disparities in states with higher food insecurity among households with children, higher percentages of people of color, and greater rurality.

Food Insecurity among Eligible Households

In this section, we use state-level data from Feeding America's *Map the Meal Gap*, which provides estimated rates of household food insecurity among people in households earning incomes less than 185 percent of the federal poverty line (FPL) with children under 18 years old.¹⁸ We deem these households to be eligible for Summer EBT, given the presence of children and their income.

Thirteen states chose not to implement Summer EBT in 2024 (figures 9 and 10).¹⁹ Using *Map the Meal Gap* state-level estimates on the number of food insecure people in the US, in 2022, 30 percent of food insecure people—approximately 13.3 million among an estimated 44.2 million food insecure people nationally—were living in states that did not offer Summer EBT. When looking specifically at the food insecurity rates among income-eligible households with children (as defined above), few states that opted out have some of the highest levels of need, with rates as high as 75 percent in Alabama and Mississippi and 71 percent in Alaska and Georgia (figures 9 and 10).

FIGURE 9
Estimated Household Food Insecurity among Summer EBT Eligible Households with Children in 2022—All States



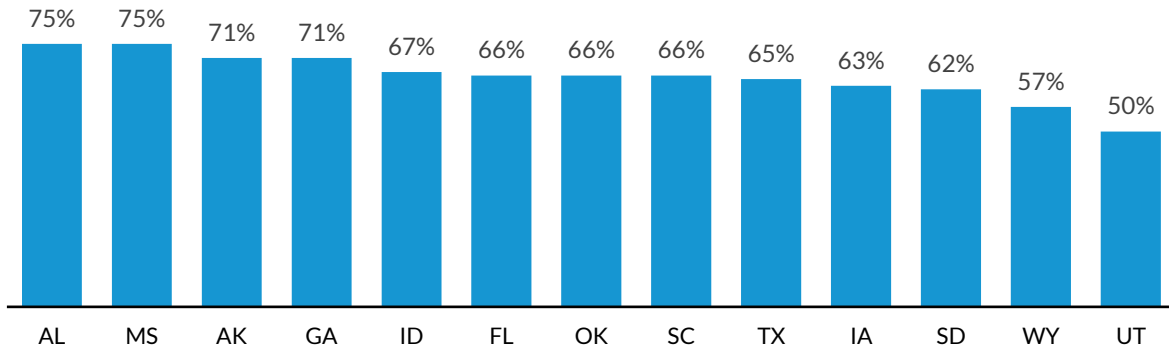
URBAN INSTITUTE

Source: Authors' analysis based on Food Nutrition Service's 2024 Summer EBT data and Feeding America's *Map the Meal Gap*, 2022.

Note: Food insecurity data are among households eligible for Summer EBT, defined as households earning up to 185 percent of the federal poverty line with children under 18.

FIGURE 10

Estimated Household Food Insecurity among Summer EBT Eligible Households in 2022 among States that Opted Out in 2024



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Source: Authors' analysis based on Feeding America's *Map the Meal Gap*, 2022.

Note: Food insecurity data are among households eligible for Summer EBT, defined as households earning up to 185 percent of the federal poverty line with children under 18.

Furthermore, few states that opted out had high shares of potentially eligible children. For example, Florida, Georgia, and Texas have the highest total numbers of children estimated to be eligible for Summer EBT: over 1.6 million in Florida, almost 1 million in Georgia, and almost 3 million in Texas (see table 3).

Food Insecurity among Eligible Households, by Child Race and Ethnicity

To examine potential disparities by race and ethnicity among states that opted in to Summer EBT and those that did not, we assess the share of children living in income-eligible households (as defined above) in each state by their race and ethnicity. Specifically, we look at the racial and ethnic categories of American Indian or Alaska Native (AIAN), Black non-Hispanic, Hispanic, white non-Hispanic, and of another race (e.g., Asian, Pacific Islander, and those who identify as multiple races/ethnicities), using 2023 state-level data from the American Community Survey via IPUMS.

Among all children in eligible households across the nation, 1.0 percent were AIAN, 19.7 percent were Black, 34.8 percent were Hispanic, 33.3 percent were white, and 11.1 percent were of another race (table 2). When we look at the shares of children in eligible households in the subset of states that opted in and opted out of Summer EBT, a higher share of AIAN, Black, and Hispanic children lived in

states that were less likely to have access to Summer EBT, while a higher share of children identifying as of another race and white children lived in states that were more likely to have access to Summer EBT.

TABLE 2

Share of Eligible Children by Child’s Race and Ethnicity Nationally, among States that Opted In, and among States that Opted Out of Summer EBT in 2024

	National (%)	Among states that opted in (%)	Among states that opted out (%)
American Indian or Alaska Native	1.0	0.8	1.1
Black, non-Hispanic	19.7	17.8	23.7
Hispanic	34.8	33.9	38.8
White, non-Hispanic	33.3	36.0	27.8
Other, non-Hispanic	11.1	12.4	8.6

Source: American Community Survey, 2023 state-level data (IPUMS).

Note: Households eligible for Summer EBT are defined as those earning up to 185 percent of the federal poverty line with children under 18.

The racial and ethnic composition of children in eligible households varied by state. Most states have a relatively low share of AIAN children, which is why the shares of AIAN children in eligible households were relatively low in many of the states that opted out. However, there were significantly higher shares of AIAN children in eligible households in Alaska (35.4 percent) and South Dakota (24.5 percent), both states that opted out. The shares of other groups of children varied more across states that opted out. Of all children in eligible households in these states, 1–51 percent were Black children, 6–62 percent were Hispanic children, 16–65 percent were white children, and 5–65 percent were children identifying as another race or ethnicity. Among states that opted out, Alabama, Georgia, and Mississippi had the highest shares of Black children; Florida and Texas had some of the highest shares of Hispanic children; and Idaho and Wyoming had some of the highest shares of white children (table 3).

TABLE 3

Estimated Number and Share of Children in Eligible Households among States that Opted Out of Summer EBT in 2024, by Racial or Ethnic Group

State that opted out	Estimated number of children in eligible households overall (N)	American Indian or Alaska Native (%)	Black, non-Hispanic (%)	Hispanic (%)	White, non-Hispanic (%)	Other, non-Hispanic (%)
AK	45,310	35.4	1.1	6.5	27.8	29.2
AL	484,695	0.2	40.3	11.5	40.6	7.4
FL	1,604,916	0.0	26.3	37.1	27.3	9.2
GA	985,015	0.3	41.3	22.1	26.0	10.4
IA	223,150	0.3	11.4	20.1	56.6	11.6
ID	153,522	0.6	2.6	26.2	64.2	6.3
MS	327,588	0.8	51.2	6.9	33.6	7.6
OK	416,649	9.1	9.8	28.6	37.4	15.1
SC	467,739	0.2	39.7	16.4	35.5	8.1
SD	83,422	24.5	8.2	11.3	45.0	11.0
TX	2,947,676	0.1	15.0	62.4	16.1	6.5
UT	239,609	1.2	1.6	32.2	53.2	11.9
WY	45,782	4.1	1.3	25.0	64.6	5.0

Source: American Community Survey, 2023 state-level data (IPUMS).

Note: Households eligible for Summer EBT are defined as those earning up to 185 percent of the federal poverty line with children under 18.

Food Insecurity among Households, by Rurality

Food insecurity rates are typically higher among households with children in rural areas, where residents experience barriers to accessing nearby summer meal sites and retail stores (Boone and FitzSimons 2024). Although Summer EBT is available at the state level, some states have higher shares of rural counties than others, meaning states with more rural counties that did not provide Summer EBT may not be serving this vulnerable population at a higher rate.

In this section we assess the differences in Summer EBT availability across rural and urban counties using USDA's 2023 Rural-Urban Continuum Codes (RUCC) to determine county-level rurality. About three in five counties in the US are designated as rural according to RUCC. Although we are not able to assess the share of children eligible for Summer EBT within these counties because of limitations in data availability, it is still noteworthy that households living in urban counties were more likely to have access to Summer EBT than those living in rural counties in 2024 (table 3).

TABLE 3

Share of Counties Designated as Urban and Rural Nationally, among States that Opted In, and among States that Opted Out of Summer EBT in 2024

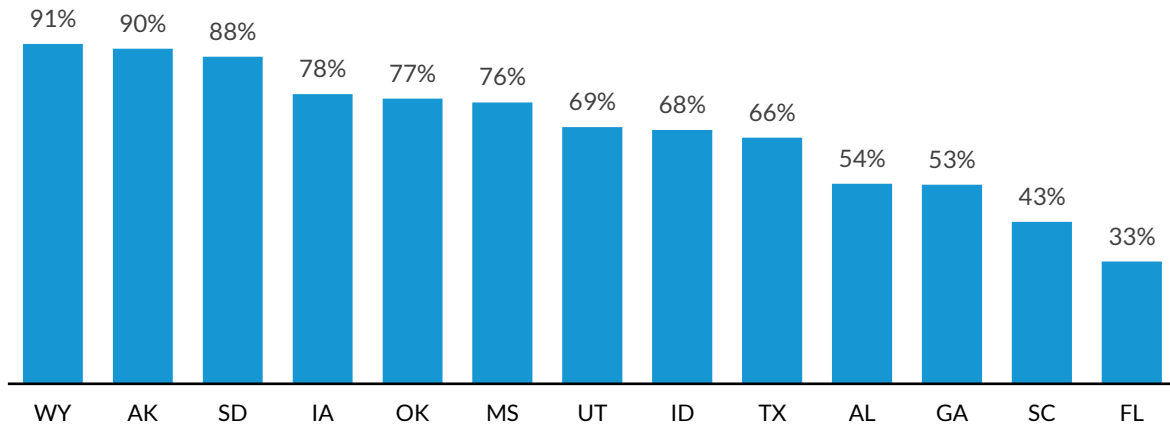
	National (%)	Among states that opted in (%)	Among states that opted out (%)
Counties classified as urban	38.7	39.4	34.3
Counties classified as rural	61.3	60.6	65.7

Source: USDA Rural-Urban Continuum Codes, 2023, <https://www.ers.usda.gov/data-products/rural-urban-continuum-codes>.

Figure 11 shows state-by-state share of counties by 2023 rural designation among states that opted out of Summer EBT. The majority of counties in 11 of these 13 states are made up of rural counties. For example, over 75 percent of counties in Arkansas, Iowa, Mississippi, Oklahoma, South Dakota, and Wyoming are rural, leaving children in eligible households in these counties with fewer resources than children in states that opted in to Summer EBT.

FIGURE 11

Share of Counties Classified as Rural among States that Opted Out of Summer EBT in 2024



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Source: USDA Rural-Urban Continuum Codes, 2023, <https://www.ers.usda.gov/data-products/rural-urban-continuum-codes>.

Lessons for the Future

Implementation of the new Summer EBT program proved to be challenging in 2024 for many states. State SNAP agencies had to contend with both external challenges, such as delayed and incomplete guidance from FNS and lack of sufficient and timely state administrative funding, and internal challenges, such as relationship management with other state agencies, limited workforce capacity, and building or managing data infrastructure.

Ultimately, 37 states, all 5 US territories, and 2 tribal nations were able to successfully implement an entirely new federal nutrition program in a short time frame, administering benefits to an estimated 21 million children and providing nearly \$2.5 billion in grocery benefits.²⁰ The value of the program for participants was evident from our interviews, with one interviewed Summer EBT recipient noting, “[the program was] incredibly helpful during a difficult financial period for my family.”

States discussed plans to make changes in 2025, including system enhancement and management (88 percent); data collection (81 percent); and family outreach, communications, and notifying families (69 percent). According to survey responses, many states noted they hope to build on lessons from 2024 to enhance their data infrastructure, particularly so that it could effectively house both SNAP and child nutrition data. Other respondents expressed their desire to secure more funding and resources, such as staffing capacity, to ensure the program’s long-term sustainability. However, it was evident from interviewees that states expect to continue to face challenges in 2025, given the same quick turnaround required to submit plans (see box 1, above, for timeline). As one state SNAP director explained in an open-ended survey question: “Year one is about getting the program off the ground. Year two will be about working off a new schedule.... Year three will likely be the first year the program doesn’t feel like a year-one program.”

Recommendations to Improve Implementation

We have identified the following key recommendations for USDA to improve future rounds of Summer EBT implementation based on states’ input (Gupta et al. 2024):

- **Provide clear guidance to states and approve plans in a timely manner.** In summer 2025, states that operated the program in 2024 will have a better idea of its rules and requirements, and states that did not previously participate can refer to how other states successfully implemented the program. To further help smooth the implementation process in 2025, USDA

should quickly respond to questions from states and disseminate the answers to ensure every state has access to the same information. Moving forward, USDA should work to approve plans as quickly as possible to avoid implementation delays.

- **Provide additional support for states to develop data management systems.** In 2026, states will be required to operate a statewide database for school and FRP lunch enrollment, which will be challenging for states. Although FNS has provided some much-needed grant funding to assist with technology infrastructure via noncompetitive Summer EBT Technology Grants (available to all states) and posted some guidance on database requirements, states would benefit from additional time and funding support to make these systems robust.²¹
- **Offer guidance on how SNAP agencies and child nutrition agencies should work together.** Summer EBT's original statute did not define how these agencies should partner and what roles they should assume. Therefore, FNS should provide guidance on what roles each agency could take on to help ensure the burden of implementation does not fall disproportionately on one agency and the work is shared more equitably among state partners.
- **Continue allowing states to request flexibilities in administrative program requirements.** The option to waive some timeline requirements in 2025 could help states that may be struggling with data infrastructure or other barriers to implementation. Although states should work to prioritize issuing benefits to families in a timely manner to avoid large lapses from when school meals end to when summer begins, this flexibility, within reason, is helpful during the start-up years.

States have identified several barriers that stem from federal constraints. Policymakers can encourage more states to opt in to Summer EBT and help ease implementation in following ways:

- **Provide a higher rate of match funding for the administrative costs of running the program, particularly in the first years of implementation.** Launching a new program requires capacity building, including new staffing and up-front investments, such as long-term technology enhancements, that are challenging for states to fund at the traditional 50 percent match rate. Insights from prior evaluation of the Summer EBT demonstration showed that administrative costs declined as the demonstration progressed, indicating that states may require additional funding in initial years to build a new program infrastructure (such as a 100 percent match for Pandemic EBT), but a 50 percent match may be sufficient in later years (Nutter et al. 2024).
- **Require schools to share data with the state agency for the purposes of implementation.** This was done for Pandemic EBT to alleviate schools' concerns about FERPA requirements and

facilitate data sharing between schools and SNAP agencies. If additional regulatory guidance is not sufficient to address this barrier, there may be a need for legislative clarification.

The Need for Summer EBT

Summer EBT has a strong evidence base for improving food security among households with children. Although the eligibility standards are the same for children across the country (i.e., households earning 185 percent of the federal poverty line), access to the program depends on a state's decision to opt in. Our analysis highlights the disparities in the availability of support for children at risk of or living in food-insecure households. We find that some of the most vulnerable children—children living in states with high food insecurity; Black, Hispanic, and AIAN children; and children living in rural counties—were less likely to reside in states that chose to provide Summer EBT benefits in 2024. To reduce food insecurity among all families with children, full implementation across all states is necessary. A strong Summer EBT program is an important tool for supporting the health and well-being of children, especially in the wake of persistent elevated food prices, food hardship, and the potential for cuts in other crucial federal nutrition safety net programs (Gupta, Martinchek, and Waxman 2025; Gonzalez et al. 2025).

Notes

- ¹ “USDA Summer Meals Study,” US Department of Agriculture, Food and Nutrition Service, updated January 24, 2025, <https://www.fns.usda.gov/research/sfsp/summer-meals-study>.
- ² Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, H.R. 2997, 111th Cong. (2010). <https://www.congress.gov/bill/111th-congress/house-bill/2997>.
- ³ Families First Coronavirus Response Act, H.R. 6201, 116th Cong. (2020), <https://www.congress.gov/bill/116th-congress/house-bill/6201>.
- ⁴ “Pandemic Electronic Benefits Transfer (P-EBT) Questions and Answers for Retailers,” US Department of Agriculture, Food and Nutrition Service, updated June 18, 2024, <https://www.fns.usda.gov/snap/pandemic-ebt-questions-and-answers-retailers>.
- ⁵ Consolidated Appropriations Act, H.R. 2617, 117th Cong. (2023), <https://www.congress.gov/bill/117th-congress/house-bill/2617/text>.
- ⁶ Tribal nations are referred to as Indian Tribal Organizations, or ITOs, by USDA.
- ⁷ In cases where we received more than one response from a state (e.g., if a SNAP director completed the survey twice, or if more than one Summer EBT representative filled out the survey), we defaulted to the most complete response and/or the response from the state SNAP director.
- ⁸ Payments to Summer EBT Agencies and Use of Administrative Program Funds, 7 C.F.R. § 292.20 (2024), <https://www.ecfr.gov/current/title-7/section-292.20>.
- ⁹ States were asked, “To what extent did the following reasons contribute to your state not implementing in summer 2024?” They were able to select more than one response. Eight nonimplementing states responded to this question, but data on this question were not calculated.
- ¹⁰ These states were Arizona, Kansas, Louisiana, Maryland, Minnesota, New Jersey, Ohio, and Vermont. “2024 SUN Bucks Implementing States, Territories, and Tribes,” US Department of Agriculture, Food and Nutrition Service, updated March 3, 2025, <https://www.fns.usda.gov/sebt/implementation>.
- ¹¹ FERPA outlines regulations for maintaining student confidentiality.
- ¹² Jennifer Tolbert and Bradley Corallo, “An Examination of Medicaid Renewal Outcomes and Enrollment Changes at the End of the Unwinding,” KFF, September 18, 2024, <https://www.kff.org/medicaid/issue-brief/an-examination-of-medicaid-renewal-outcomes-and-enrollment-changes-at-the-end-of-the-unwinding>.
- ¹³ “Supplemental Nutrition Assistance Program (SNAP)—Temporary Administrative Waivers Available to State Agencies to Support Unwinding from the COVID-19 Public Health Emergency,” US Department of Agriculture, Food and Nutrition Service, August 15, 2022, <https://www.fns.usda.gov/snap/temporary-administrative-waivers-available-state-agencies-support-unwinding-covid-19>.
- ¹⁴ “US Department of Education Letter on Disclosure of Student Information to Enroll Children in Summer EBT,” US Department of Agriculture, Food and Nutrition Service, January 17, 2025, <https://www.fns.usda.gov/sunbucks/ferpa>.
- ¹⁵ FNS provided noncompetitive Summer EBT technology grant funding to states to assist with technology infrastructure. “Summer EBT Technology Grants,” US Department of Agriculture, Food and Nutrition Service, updated August 7, 2024, <https://www.fns.usda.gov/grant/summer-ebt-technology-grants>.
- ¹⁶ One in five income-eligible families do not receive SNAP, and even fewer receive TANF. See “SNAP Participation Rates by State, All Eligible People (FY 2018),” US Department of Agriculture, Food and Nutrition Service, accessed April 29, 2025, <https://www.fns.usda.gov/usamap>; and 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>.

¹⁷ "SFSP Characteristics Study," US Department of Agriculture, Food and Nutrition Service, updated January 24, 2025, <https://www.fns.usda.gov/research/sfsp/characteristics-study>.

¹⁸ Feeding America, "Map the Meal Gap," accessed April 30, 2025, <https://map.feedingamerica.org>.

¹⁹ Alabama and Utah demonstrated interest in implementing Summer EBT in 2024 but had state-level budgetary restrictions that prevented implementation; both states plan to implement in 2025. Tennessee, which participated in 2024, has chosen to opt out of participating in 2025. Oklahoma opted out of both 2024 and 2025; however, tribal nations opted in to providing benefits to children on tribal land, which is roughly half of Oklahoma. This analysis is limited to the 37 states that opted in to implementing in 2024.

²⁰ "Nearly 21 Million Children Expected to Receive New Grocery Benefit This Summer," press release, US Department of Agriculture, January 10, 2024, <https://www.usda.gov/about-usda/news/press-releases/2024/01/10/nearly-21-million-children-expected-receive-new-grocery-benefit-summer>.

²¹ "Summer EBT Technology Rants," US Department of Agriculture, Food and Nutrition Service; and "Summer EBT NSLP/SBP Enrollment Database Requirements," US Department of Agriculture, Food and Nutrition Service, updated November 22, 2024, <https://www.fns.usda.gov/summer/sunbucks/implementing-agency/toolkit/database-requirements>.

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About the Authors

Poonam Gupta is a research associate in the Tax and Income Supports Division at the Urban Institute, where she focuses on social safety net policy. She works on several projects related to federal nutrition programs and food insecurity, as well as issues affecting immigrant and undocumented communities. Gupta received BAs in public health and Spanish from Johns Hopkins University and an MSPH in international health from Johns Hopkins School of Public Health.

Emily Gutierrez is a senior research associate in the Work, Education, and Labor Division at the Urban Institute. Her research focuses on K–12 education policies that aim to mitigate educational inequities, disparities, and external factors that affect student success. Gutierrez received BBAs in economics, Spanish, and public administration and an MS in economics from Baylor University and a PhD in public administration from Syracuse University

Ariella Meltzer is a research analyst in the Work, Education, and Labor Division, where she focuses on K–12 education policy. Her research interests include school and district governance, teacher and principal leadership and hiring pipelines, and the intersection of housing and education issues. Meltzer received a BA in political science from the University of Michigan and an MPP from Vanderbilt University's Peabody College of Education.

Baris Tezel is a research assistant in the Tax and Income Supports Division, where he focuses on federal nutrition programs and immigration policy. Tezel received a BA in economics from Boston College with a minor in International Relations.

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