

## **How states and school districts can ensure that millions of families receive the Summer EBT benefit they are eligible for under the law**

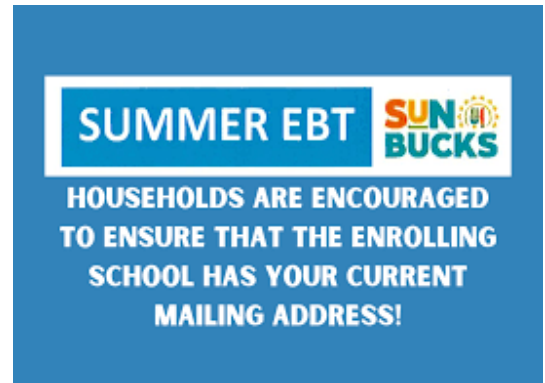
**Summary:** The new [Summer EBT Program](#) is now in full swing with a potential distribution of \$3.7 billion dollars to the families of 30 million eligible children for the summer of 2024<sup>1</sup>. The Summer EBT must be spent within 122 days of the funds being issued on a card (not when families receive the new card in the mail). Due to a wrong address and minimal outreach and publicity, a family may never know they have a Summer EBT benefit waiting for them to spend. For families that are not categorically eligible for Summer EBT, States can also allow for a full year to submit applications. Our latest report [Pandemic-EBT \(P-EBT\) Lessons for Ensuring a Successful Summer EBT Program](#), showed how in the final P-EBT distributions, close to a billion dollars went unspent by eligible families. States and their school districts have an opportunity to make sure Summer EBT dollars get fully spent by struggling families.

- **122 days use it or lose it reg:** Summer EBT's 122 days *use it or lose it* regulation is a BIG change from P-EBT and SNAP expungement deadlines. Both SNAP and P-EBT programs have a 274-day expungement deadline; when a family spends a dollar on the card, the clock is reset for another 274 days. While there has been some publicity around the Summer EBT deadline of 122 days, it's fair to assume that most families only know the 274 day deadline.
  
- **When Summer EBT dollars are sent to the wrong address, what happens?** When the state government agency administering Summer EBT sends the eligibility letter or card out to a wrong address, how will the affected family know? Four months may slip by quickly before an eligible family realizes they never got their summer EBT card. While states are required to send out a warning letter prior to expungement, this step will not help if the letter goes to an old or incorrect address. ***Once the four-month deadline passes, the money is gone and stays with the Federal Government.***
  
- **Closing the *notification gap* with better communication:** There is a practical, easy to implement and low-cost remedy to close the notification gap. A state-by-state robust outreach from school districts and other stakeholders to their Summer EBT eligible families can be launched tomorrow. Wrong addresses can be easily fixed when a family knows to be on the lookout for their Summer EBT card. If a family did not receive the notification letter or card, they can request a Replacement Card. A little extra publicity and targeted outreach by the school districts and other stakeholders will cost only a few dollars but could mean hundreds of millions of dollars for struggling families.

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<sup>1</sup> <https://www.fns.usda.gov/sebt/estimated-children-eligible>

- **Federal regulations allow states to receive Summer EBT applications for a full year:** The United States Department of Agriculture-Food and Nutrition Services (USDA-FNS) issued new guidance requiring states a full year to accept applications from families that are not categorically eligible. USDA-FNS estimates that 16.8 million children fall into this group. These are households with incomes below 185% but do not receive SNAP, Medicaid, TANF or do not have a current income verification form on file with their school district free lunch program. If all of these families apply and are determined eligible, then around \$2 billion will be distributed to struggling families for free groceries. The main ingredient required here is once again a robust publicity campaign. States and school districts can start today with encouraging families to submit the online application. With eight months to go before Summer 2025, there is plenty of time to make sure all eligible families submit the application.



## How states and school districts can ensure that millions of families receive the Summer EBT benefit they are eligible for under the law

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The Summer 2024 EBT program is now in full swing. Despite some [reported lags](#) in distributing the dollars, a potential distribution of \$3.7 billion is on its way to struggling families. Our latest report highlights a critical issue in the distribution of Summer EBT benefits: the structural gap in communication due to incorrect addresses and the 122 day use or lose it deadline. This gap can prevent eligible families from receiving and using their benefits within the stipulated timeframe, resulting in significant unclaimed funds. Another important publicity opportunity can be found with the Federal rule requiring states to allow for a full 12 months for families to submit an application. Here's the key points and recommendations:

### Key Points

#### **1. Address Errors were a serious problem during P-EBT. At least \$5 billion never got to the correct recipient address.**

The USDA Food and Nutrition Guidance acknowledged the seriousness of address errors as the P-EBT program started its second year of distributions. The USDA-FNS P-EBT state plan template required each states to explain how it would handle address errors:

- “During SY 2020-2021, large numbers of P-EBT cards were returned to EBT processors via mail, due to incorrect addresses. How will you and your EBT processor handle returned P-EBT cards? How will you handle the need to issue replacement cards in these cases?”<sup>2</sup>

Somewhere between 5% and 10% of all cards distributed never got to the right address. Here are examples from California and Missouri:

- Missouri: Based on FOIA data received from Missouri Department of Social Services, 24,869 out of 317,056 P-EBT cards were returned due to wrong addresses for the last P-EBT distribution (School Year 2021-22 and Summer 2022)<sup>3</sup>.
- California: P-EBT 2.0 benefits were issued to children who were eligible for free or reduced-priced meals and/or in the CalFresh program from October 2020 - August 2021. All P-EBT 2.0 cards should have been received by December 2021, however, data uncovered by San Diego Hunger Coalition <sup>4</sup> revealed that an estimated 32,500 students in San Diego County who were eligible did not receive their cards.<sup>5</sup> (DR: a total of 299,640 P-EBT 2.0 cards were distributed for San Diego County)

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<sup>2</sup> USDA-FNS State Template. <https://fns-prod.azureedge.us/sites/default/files/resource-files/Pandemic-EBT-state-plans-2020-2021-schools-child-care-template.pdf>

<sup>3</sup> Missouri Department of Social Services FOIA request.

<sup>4</sup><https://static1.squarespace.com/static/55130907e4b018f9300f3e63/t/64a888b79cc2d35c0bad7057/1688766647598/07.07.2023+San+Diego+Hunger+Coalition+-+P-EBT+2.0+Reissuance+Press+Release.pdf>

## 2. Why do state agencies have address errors:

- State agencies often have incomplete or inaccurate databases of home addresses for eligible families.
- Reasons for wrong addresses include people moving during the school year or incorrect data entry by the agency.

## 3. Impact on Families:

- Families may not receive the alert letter or the Summer EBT card due to address issues.
- The 122-day usage clock starts when the money is loaded onto the card, not when the family receives it.
- If families are unaware of the benefit because they did not receive any notification, they will not use the funds within the deadline.

## 4. Retention of P-EBT Cards:

- Some states, like New York and Wisconsin, load the Summer EBT benefit onto existing P-EBT cards.
- Many families may not have kept their P-EBT cards, especially if they were not informed about the new Summer EBT program.

## 5. Scenario of Missed Benefits

- A family that does not receive the state's alert letter or the EBT card due to an incorrect address will be unaware of the benefit.
- Consequently, they will not spend the \$120 benefit within the 122-day deadline simply because they did not know it was available.

## 6. Going forward, Federal regulations allow states to receive Summer EBT applications for a full year.

Going forward to Summer 2025, another important way that states can increase Summer EBT participation is by alerting families that they can submit an application anytime now up to August 2025. USDA-FNS posted the Summer EBT guidance below on its website:

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

Households must have the opportunity to establish eligibility for Summer EBT at any point between the start of the immediately preceding school year and the last day of the summer

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5 <https://ca-times.brightspotcdn.com/14/09/c4cc07b740328e21b6b02c1683a4/p-ebt-2-0-outcomes-report.pdf>

operational period, which will generally encompass more than an entire calendar year (e.g., July 2023 - August 2024). Therefore, Summer EBT agencies must accept and process applications throughout the year. However, Summer EBT agencies are permitted to *encourage* applications to be submitted before the start of the summer operational period. For example, in communications to households, Summer EBT agencies would be permitted to say, "In order to receive Summer EBT benefits prior to the start of summer, please submit your application no later than March 1st." [7 CFR 292.13(e)] source: <https://fns-prod.azureedge.us/sites/default/files/resource-files/sebt-webinar-qa-II.pdf>

The United States Department of Agriculture-Food and Nutrition Services (USDA-FNS) issued guidance requires that states allow for a full year to accept applications from families that are not categorically eligible. USDA-FNS estimates that 16.8 million children fall into this group. These are households with incomes below 185% but do receive SNAP, Medicaid, TANF or do not have a current income verification form on file with their school district free lunch program. If all of these families apply and are determined eligible, then around \$2 billion will be distributed to struggling families for free groceries. All states have a portal where the Summer EBT application can be filled out and submitted online. The main ingredient required here is once again is a robust publicity campaign.

## **Recommendations for Remedy**

To bridge the communication gap, it is essential to implement a comprehensive outreach strategy that leverages multiple channels and stakeholders. Ensuring that eligible families are aware of their benefits and how to access them can significantly reduce the amount of unclaimed funds and enhance the program's effectiveness.

By addressing the structural communication issues and enhancing outreach efforts, states can help ensure that families receive and utilize the benefits they are entitled to, thus supporting those in need and maximizing the impact of the Summer EBT program.

### **1. Publicity and Outreach Campaign:**

- **School Districts:**
  - Utilize schools to disseminate information directly to students and parents.
- **Anti-Hunger Organizations:**
  - Partner with local organizations to reach out to communities and spread awareness about the program.
- **Elected Officials:**
  - Encourage politicians to use their platforms to inform constituents about the benefits and the importance of updating addresses.

### **2. State Agency Communication:**

- **Website Instructions:**

- Ensure that every state has a clear and easily accessible website with instructions for ordering a replacement card.
  
- **Helplines:**
  - Provide robust customer support for families to update their addresses and request replacement cards.
- **Multi-Channel Communication:**
  - Use text messages, emails, and phone calls in addition to mail to notify families about the Summer EBT program and the importance of maintaining current address information.

### Sources:

- <https://www.fns.usda.gov/sebt/estimated-children-eligible>
- <https://www.fns.usda.gov/summer/sunbucks/implementing-agency/toolkit>
- <https://www.fns.usda.gov/sebt/implementation>
- <https://www.fns.usda.gov/sebt/reporting-qas>
- <https://www.chalkbeat.org/2024/07/17/summer-ebt-sun-bucks-delays-hurt-families-until-kids-return-to-school/>
- <https://www.davidrubelconsultant.com/wp-content/uploads/2024/07/Pandemic-EBT-and-Summer-EBT.pdf>
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Appendix: Estimates prepared for state budgeting purposes - see notes at bottom of table. **USDA cautions against summing these figures to generate a national estimate of Summer EBT eligibility.**

States	SNAP/NAP EBT-recipient children: NSLP schools and non-NSLP schools (thousands)	All other Summer EBT-eligible children who do not receive SNAP/NAP on EBT cards: NSLP schools (thousands)	Total children eligible for Summer EBT (thousands)	Estimated Summer EBT benefit totals*
Alaska	29	29	58	\$6,960,000
Alabama	254	292	545	\$65,400,000
Arkansas	103	212	315	\$37,800,000
Arizona	303	248	550	\$66,000,000
California	1,596	2,255	3,851	\$462,120,000
Colorado	174	163	337	\$40,440,000
Connecticut	124	149	273	\$32,760,000
District of Columbia	47	33	80	\$9,600,000
Delaware	50	30	80	\$9,600,000
Florida	1,026	1,132	2,158	\$258,960,000
Georgia	568	588	1,156	\$138,720,000
Hawaii	48	52	100	\$12,000,000
Iowa	93	148	240	\$28,800,000
Idaho	43	64	107	\$12,840,000
Illinois	602	543	1,145	\$137,400,000
Indiana	215	454	669	\$80,280,000
Kansas	73	193	266	\$31,920,000
Kentucky	180	420	600	\$72,000,000
Louisiana	300	294	594	\$71,280,000
Massachusetts	331	183	515	\$61,800,000
Maryland	203	297	500	\$60,000,000
Maine	46	16	63	\$7,560,000
Michigan	584	252	836	\$100,320,000
Minnesota	158	255	412	\$49,440,000
Missouri	228	201	429	\$51,480,000
Mississippi	181	144	324	\$38,880,000
Montana	37	31	68	\$8,160,000
North Carolina	528	440	968	\$116,160,000
North Dakota	16	23	40	\$4,800,000
Nebraska	83	92	175	\$21,000,000
New Hampshire	23	16	39	\$4,680,000
New Jersey	277	263	540	\$64,800,000
New Mexico	147	75	223	\$26,760,000
Nevada	139	213	352	\$42,240,000
New York	767	1,260	2,027	\$243,240,000
Ohio	474	363	837	\$100,440,000
Oklahoma	206	197	403	\$48,360,000
Oregon	205	89	294	\$35,280,000
Pennsylvania	522	644	1,166	\$139,920,000
Rhode Island	38	29	66	\$7,920,000

States	SNAP/NAP EBT-recipient children: NSLP schools and non-NSLP schools (thousands)	All other Summer EBT-eligible children who do not receive SNAP/NAP on EBT cards: NSLP schools (thousands)	Total children eligible for Summer EBT (thousands)	Estimated Summer EBT benefit totals*
South Carolina	232	311	543	\$65,160,000
South Dakota	27	30	57	\$6,840,000
Tennessee	306	338	644	\$77,280,000
Texas	1,370	2,382	3,752	\$450,240,000
Utah	60	138	198	\$23,760,000
Virginia	289	502	791	\$94,920,000
Vermont	22	12	35	\$4,200,000
Washington	247	259	507	\$60,840,000
Wisconsin	220	181	401	\$48,120,000
West Virginia	103	99	202	\$24,240,000
Wyoming	11	20	32	\$3,840,000
American Samoa	not applicable	14	14	\$1,680,000
Commonwealth of the Northern Mariana Islands	0	11	11	\$1,320,000
Guam	17	9	26	\$3,120,000
Puerto Rico	165	115	280	\$33,600,000
Virgin Islands	6	6	12	\$1,440,000
<b>TOTAL</b>				<b>\$3,708,720,000</b>

\*This table displays upper estimates for some states. Therefore, **USDA cautions against summing these figures to generate a national estimate of Summer EBT eligibility**. Summing these figures will generate a figure that exceeds USDA's best national estimate of eligibility.

#### Notes

- USDA estimates from school year 2022-2023 state-reported data on School Food Authority Verification Collection Report (FNS-742) and State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report (FNS-834), and Report of School Program Operations (FNS-10).
- For some states, these sources generate different estimates. Where USDA's preferred estimate (one that uses primary measures of eligibility and SNAP enrollment) falls significantly short of our alternate estimate (based on more highly aggregate data) USDA displays the higher figure. Given that the table displays upper estimates for some states, **USDA cautions against summing these figures to generate a national estimate of Summer EBT eligibility**. Summing these figures will generate a figure that exceeds USDA's best national estimate of eligibility.
- Estimates for the territories are based on limited administrative and study data.
- USDA's estimates are not a substitute for communication between the EBT processors and their customers for both the states and the territories.
- Estimated benefit amounts assume all eligible children receive \$120 in Summer EBT benefits for 2024. Actual numbers may vary. The Consolidated Appropriation Act of 2023 provides the authority to adjust benefit amounts in Alaska, Hawaii, Guam, American Samoa, Puerto Rico, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands. Total benefits may differ once rates for those locations are determined.

Source: <https://www.fns.usda.gov/sebt/estimated-children-eligible>