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How states and school districts can ensure that four million children will receive the Summer EBT (SUN Bucks) benefit they are eligible for under the law (January 2025 Update)¹

- 1. Building on the success of last summer, the Summer EBT program has the potential to distribute around \$3.5 billion to struggling families so children do not go hungry when schools are closed. One area where more outreach is greatly needed is with eligible families that must submit an application.**
- 2. Summer EBT 2025 applications can be uploaded now! All Summer EBT program participating states are required to accept and process Summer EBT applications year round.**
- 3. Based on FOIA data responses from 14 states, only 7.6% of eligible families submitted an application last summer (2024). The families of an estimated 4 million children did not submit an application.**
- 4. \$500 million may go unused this summer unless there is more publicity encouraging a group of eligible families (not categorically eligible) to submit an application. USDA-FNS estimates that this group is around 20% of the total number of eligible children.**
- 5. Summer 2025 starts now! Applications can be sent in today. Stakeholders hold the key to getting the word out to eligible families. School Districts, elected officials, anti-hunger and community based organizations, food pantries can make the difference here. It only takes 10 to 15 minutes to fill out and submit the online application.**

¹ David Rubel Associates posted [How states and school districts can ensure that millions of families receive the Summer EBT benefit they are eligible for under the law](#) in October, 2024. The policy report focused on the limitations of the 122 day Summer EBT expungement rule.

How states and school districts can ensure that millions of families receive the Summer EBT benefit they are eligible for under the law (January 2025 Update)²

Analysis and Supporting Documentation

1. Summer EBT Applications can be uploaded now! All Summer EBT participating states are required to process Summer EBT applications year round.

Last summer, states posted their online application in July with only a two month window to apply. The short period to submit, minimal publicity, along with lack of familiarity, meant that most eligible households never applied. Unlike last summer, eligible households now have a wide window of opportunity to submit an application. For example, in New York State, while the deadline for the Summer EBT 2024 benefit was September 3, families that submitted the application after that date became eligible for the Summer EBT 2025 benefit- 10 months before summer starts. USDA requires that all participating states make an online application available year round. “By 2025, the Summer EBT agency must make a Summer EBT application available to households whose children are enrolled in NSLP- or SBP-participating schools and who do not already have an individual eligibility determination.”³ While some states have posted a Summer 2025, many still have not.

2. \$500 million in Summer EBT may go unused this summer unless there is more publicity around encouraging a group of eligible families (not categorically eligible) to submit a Summer EBT application.

For the Summer 2025 program, an estimated \$500 million is sitting on the table waiting to be distributed to struggling families. The \$500 million figure is based on a breakdown between categorically eligible and households that will have to submit an application. The United States Department of Agriculture-Food and Nutrition Services (USDA-FNS) research expects that the breakdown between the two groups is 80% (categorically eligible)-20% (will have to submit an application).

“It is expected that streamline certification will account for 80% of Summer EBT enrollment and enrollment through Summer EBT applications will account for the remaining 20% of enrollment, which is reflective of the approximate ratio of students who are certified free or reduced price to those who are eligible but must apply (*e.g.*, students who have not been certified or submitted applications for the NSLP because they are able to receive free meals through CEP or are enrolled in Provision 2 or 3 schools). Combining the passive enrollment take-up rate (93.5% for the passive enrollment children) and the active enrollment take-up rate (40% for the active enrollment children) results in a weighted average participant take-up of 83%.” Source: **Federal Register** / Vol. 88, No. 249 / Friday, December 29, 2023 / Rules and Regulations page 90388.

² David Rubel Associates posted *How states and school districts can ensure that millions of families receive the Summer EBT benefit they are eligible for under the law* in October, 2024. The policy report focused on the limitations of the 122 day Summer EBT expungement rule.

³ **Federal Register** / Vol. 88, No. 249 / Friday, December 29, 2023 / Rules and Regulations.

In Chart 1 below is a breakdown of all Summer EBT participating states (non-participating states have 0 in each column). The chart takes the USDA-FNS estimate that 20% of all eligible households will have to submit an application and shows the actual number for each participating in the last column. States that do not accept Medicaid for categorically eligible will have a higher estimate of households that must submit an application.

Chart 1: Number of eligible households that will need to submit a Summer EBT application by state

States	USDA: Total estimated children eligible for Summer EBT (thousands)	20% Factor/Estimate of Summer EBT Applications Households (thousands)
Alaska	0	0
Alabama	545	109
Arkansas	315	63
Arizona	550	110
California	3,851	770.2
Colorado	337	67.4
Connecticut	273	54.6
District of Columbia	80	16
Delaware	80	16
Florida	0	0
Georgia	0	0
Hawaii	100	20
Iowa	0	0
Idaho	0	0
Illinois	1,145	229
Indiana	669	133.8
Kansas	266	53.2
Kentucky	600	120
Louisiana	594	118.8
Massachusetts	515	103
Maryland	500	100
Maine	63	12.6
Michigan	836	167.2
Minnesota	412	82.4
Missouri	429	85.8
Mississippi	0	0
Montana	68	13.6
North Carolina	968	193.6
North Dakota	40	8
Nebraska	175	35
New Hampshire	39	7.8

New Jersey	540	108
New Mexico	223	44.6
Nevada	352	70.4
New York	2,027	405.4
Ohio	837	167.4
Oklahoma	0	0
Oregon	294	58.8
Pennsylvania	1,166	233.2
Rhode Island	66	13.2
South Carolina	0	0
South Dakota	0	0
Tennessee	0	0
Texas	0	0
Utah	198	39.6
Virginia	791	158.2
Vermont	35	7
Washington	507	101.4
Wisconsin	401	80.2
West Virginia	202	40.4
Wyoming	0	0
Puerto Rico	280	56
Total	21,369,000	4,273,800

When all Summer EBT participating states are added up, the households an estimated 4,273,000 children will need to complete an application.

3. Last Summer, based on FOIA requests to a sampling of State Summer EBT administering agencies, only a tiny number of Summer EBT eligible households submitted applications for approval.

Given the newness of Summer EBT, only a few hundred thousand eligible families submitted an application. Last summer, the window for families to submit an application was very short with most states having a two months (or less) window. USDA estimated that only 40% of potential applicant pool will actually submit applications⁴. Based on FOIA requests with a sampling of states, the number of applicants is much lower. A FOIA letter sampling of states was conducted for this report. Freedom of

⁴ "Participant take-up (*i.e.*, the share of eligible children who are enrolled and participate by spending any amount of Summer EBT benefits) is estimated based on two studies of Summer EBT demonstration projects.⁴⁶ The first study of Summer EBT demonstration projects occurring between 2011 and 2014 provided a range of participant take-up rates of children who are enrolled in Summer EBT via passive enrollment and a separate range for those enrolled via active enrollment.⁴⁷ This study showed that the average participant take-up rate via passive enrollment was 93.5% (ranging from 90% to 97% in demonstration projects) and the average participant take-up rate via active enrollment was 40% (ranging from 23% to 57%)." **Federal Register** /Vol. 88, No. 249 / Friday, December 29, 2023 /Rules and Regulations. Page 90388.

Information Act (FOIA) requests were sent out to 20 states asking for the number of applications submitted before the deadline. In the chart below are states that responded to a FOIA request. Each state provided the number of applications received by the deadline.

Chart 2: Applications submitted for the Summer EBT 2024 program⁵

States Sampling ⁶	Potential Applications	Applications Submitted	Percentage applications submitted	Total Potential Dollars
Arizona ⁷	110,000	556	.5%	\$13,200,000
Colorado	67,400	25	.003%	\$8,088,000
Connecticut ⁸	54,600	3,173	5.8%	6,552,000
Kansas ⁹	193,000	5,686	2.9%	\$23,160,000
Louisiana	118,800	10,973	9.2%	\$14,256,000
Massachusetts ¹⁰	103,000	21,635	21%	12,360,000
Minnesota	82,400	221	.26%	\$9,888,000
Missouri ¹¹	132,299	24,299	18.3%	\$15,875,880
Nebraska	35,000	3,103	8.8%	\$4,200,000
New York	282,000	17,158	6%	\$33,840,000
North Carolina	193,600	37,374	19.3%	\$23,232,000
Ohio	167,400	6,801	4%	\$20,088,000
Pennsylvania	233,200	7335	3.1%	\$27,984,000
Wisconsin	80,200	3,566	4.4%	\$9,624,000
Total	1,852,899	141,905	7.6%	\$222,347,880

Chart 2 explanation: The second column on shows the potential number of children that reside in an income eligible home. This figure is based on the USDA estimate that 80% of eligible households will be categorically eligible and not need to submit an application. This group includes states that allowed Medicaid recipient households to be categorically eligible. Kansas, Missouri and North Carolina did not allow Medicaid recipients as categorically eligible. The third column shows the number of applications submitted last summer prior to a state deadline (usually around September 1st). The fourth column is the percentage of application sent in by households based on column one- total number of applicant eligible households.

⁵ The chart was updated in March and April to include FOIA responses from Massachusetts, Connecticut and Minnesota.

⁶ A FOIA request was filed with both California Department of Social Services and California Department of Education (CDE). CDE responded that the agency can only give a total figure of benefits distributed. CDE does not have a separate breakdown for applications received.

⁷ 556 applications is the number of applications accepted as income eligible by the Arizona Department of Education. It is not the number of applications submitted.

⁸ Connecticut Department of Social Services: "This number is not de-duplicative as some families submitted multiple times".

⁹ The reason why Kansas and Missouri had a much higher number of applications submitted is because both states did not allow its Medicaid household recipients to be included as categorically (automatically) eligible. All of the other states did include Medicaid as categorically eligible. Consequently, in Kansas and Missouri, Medicaid families had to submit a Summer EBT application (unless the child's free lunch participating school district submitted a list of income eligible families).

¹⁰ Massachusetts Department of Transitional Assistance (MDTA): "4,234 school children were determined eligible and approved for the \$120 Summer EBT 2024 benefit".

¹¹ See footnote 4 for explanation

Chart 2 analysis: the chart offers solid evidence that there is a huge gap between Summer EBT eligible households and the group of households that actually submitted an application last summer. There is much potential to ensure that close to four million children will benefit from the Summer EBT program as intended under the law. All that's needed now is a robust publicity campaign in each participating state starting with school districts using their parent contact information to get the word out.

4. For Summer 2025, all families not categorically eligible must submit an application to receive the benefit.

Even if a family submitted the application and was approved for a benefit last summer, they still must submit a new application for Summer 2025. Here is the guidance from USDA-FNS:

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

Yes. Individual eligibility determinations must be based on data/information that aligns with the current Program year. All children who attend NSLP/SBP schools that don't collect applications annually must have a current eligibility determination. In other words, base year eligibility determinations from prior years cannot be used to enroll children for Summer EBT. Source: <https://www.fns.usda.gov/sebt/questions-answers> December 2024 update.

5. Summer 2025 starts now! Stakeholders hold the key to getting the word out to eligible families to submit a Summer EBT application. School Districts, elected officials, anti-hunger organizations, food pantries can make the difference here.

USDA-FNS also estimates that around 83% of all eligible families in total will receive the Summer EBT benefit.¹² This estimate is not etched in stone. Effective statewide outreach efforts can make a big difference with increasing participation¹³. Prior to start of the Summer EBT 2024, USDA-FNS warned that only through robust communication will families know about the application option¹⁴. In the CFR dated December 29, 2023, USDA-FNS issued clear and comprehensive policy guidance regarding the challenges and scope of enrolling families not categorically eligible (and therefore will have to submit an application)

¹² **Federal Register** / Vol. 88, No. 249 / Friday, December 29, 2023 / Rules and Regulations

¹³ <https://www.nga.org/publications/sun-bucks-basics-for-governors-a-summer-ebt-program-primer/>

¹⁴ **Federal Register** / Vol. 88, No. 249 / Friday, December 29, 2023 / Rules and Regulations page 90388.

"Summer EBT. Households with children enrolled in provision schools are not accustomed to completing annual income applications for school meal benefits and may not know if their child is "identified" through participation in other means tested programs or if an income application must be completed. Without effective processes to communicate with families and to collect applications, this could cause confusion and negatively impact program participation. Likewise, many CEP schools do not collect income applications even on a periodic basis as eligibility because the level of Federal reimbursement for the NSLP/SBP is solely based on the number of identified students. These schools do not currently have resources and staffing to support this effort. Additionally, a number of external organizations and States urged USDA to allow the use of "alternative" income applications to confer Summer EBT eligibility." Source: **Federal Register** /Vol. 88, No. 249 / Friday, December 29, 2023 /Rules and Regulations

School Districts are the most important stakeholder for ensuring a successful Summer EBT program. Only takes 10 to 15 minutes to fill out and submit the Summer EBT online application. All participating states have an online version of the application. The application is completed with a self-attestation signing. The parents filling out the application do not have to submit any income supporting documentation¹⁵.

For toolkits and current information, check the [FRAC-Summer EBT](#) or [No Kid Hungry](#) websites.

6. [USDA-FNS Summer EBT Guidance for submitting applications \(12-31-2024\)](#)¹⁶

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

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

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

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

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

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

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

For children who apply using a Summer EBT application, Summer EBT agencies must notify (or place notification in the mail) the eligible household of a child's approved status within 15 operational days of receipt of a complete application. This may be included in the mailing containing the EBT card or another communication informing the household about the issuance or use of benefits [[7 CFR 292.12\(f\)\(1\)](#)]. For children who apply in the window when two periods of eligibility overlap, an approval notice should be sent within 15 days informing the applicant of their eligibility determination for the current program year. When enrollment in the next school year can be confirmed, a second notice should be sent to the family

¹⁵ 3% of families that submit an application will be part of a income verification sampling conducted by the state agency.

¹⁶ <https://www.fns.usda.gov/sebt/questions-answers>

that they are approved for benefits for the upcoming program year, but there are not specific requirements around the timing of this notice.

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



Kansas is showing the way with publicizing the importance of eligible families submitting an application!

GOVERNMENT, KANSAS

PROGRAM HELPS FAMILIES WITH ELIGIBLE CHILDREN OFFSET THE COST OF FOOD OVER SUMMER BREAK

JANUARY 27, 2025 SUBMITTED STORY LEAVE A COMMENT

DCF Announces 2025 SUN Bucks Application Period Now Open

TOPEKA – The Kansas Department for Children and Families (DCF) announced Monday, Jan. 27 that the 2025 application period for SUN Bucks is now open. SUN Bucks, previously called Summer EBT in Kansas, is a federal program administered by DCF that provides a one-time benefit of \$120 per year for each eligible school-aged child to help offset the cost of groceries over the summer.

“Children and teenagers need consistent access to healthy foods to grow and thrive, and summer is a time when many of them lose access to the healthy meals they receive at school,” **said DCF Secretary Laura Howard**. “SUN Bucks can help fill the gap by providing families a small boost with helping to put nutritious food on their tables.”

Many families will automatically get the SUN Bucks benefit without needing to apply. Households with an eligible child who can be identified by DCF will receive a letter from DCF in January 2025 notifying them that their child is eligible for SUN Bucks. SUN Bucks benefits

will be added to an existing household Kansas Benefits Card (also known as an EBT card) or loaded onto a Kansas Benefits Card and mailed to their home in April.

If a household did not receive a letter from DCF in January regarding SUN Bucks eligibility, and they believe their child is eligible, they will need to apply. SUN Bucks applications will be accepted from Monday, Jan. 27, 2025, through 5 p.m. on Friday, Aug. 29, 2025. Families will need to use their existing DCF self-service account or create an account to apply through the DCF online self-service portal, dcfapp.kees.ks.gov. Benefits will be issued beginning in April 2025.

Eligibility:

Children may be eligible for the program if:

- The child attends a Kansas school offering the National School Lunch or School Breakfast Program, and the household income meets the requirements for free or reduced-price school meals at any point since July 2024.

OR

- The school-aged child (7-17 years old) lives in a household where someone has received Food Assistance (SNAP) or TANF Cash Assistance at any point since July 2024.

Children in the custody of the DCF Secretary and enrolled in a Kansas school are eligible for SUN Bucks. Relatives, non-related kin, and foster homes will need to submit a SUN Bucks application for children in their care after April 1, 2025, to ensure the benefit is issued to the correct address. For any applications submitted after April 1, SUN Bucks benefits will be issued once the child has been determined eligible.

In 2024, the SUN Bucks program provided more than \$15 million in benefits to 127,202 Kansas children. Learn more about SUN Bucks at SUNBucks.dcf.ks.gov.

The SUN Bucks 2025 Application is Open!



SUN Bucks is a one-time benefit of \$120 per eligible child to help purchase groceries during the summer months.

