

David Rubel

Education Policy Consultant

www.davidrubelconsultant.com

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 law¹

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 17 states, only 8% 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. As new Summer EBT participating states program information became available, the report has been updated several times with the last update in July 2025.

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. This report has been updated several times in 2025 to include new state FOIA responses.

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 with 2025 state deadline for submitting.

States	USDA: Total estimated children eligible for Summer EBT (thousands)	20% Factor/Estimate of Summer EBT Applications Households (thousands)	Summer EBT 2025 Application Deadline
Alabama	545	109	August 15
Arkansas	315	63	August 25
Arizona	550	110	August 5
California	3,851	770.2	September 2
Colorado	337	67.4	September 3
Connecticut	273	54.6	August 15
District of Columbia	80	16	August 25
Delaware	80	16	August 31
Hawaii	100	20	August 3
Illinois	1,145	229	August 13
Kansas	266	53.2	August 29
Kentucky	600	120	August 15
Louisiana	594	118.8	August 8
Massachusetts	515	103	September 7
Maryland	500	100	August 31
Maine	63	12.6	August 15
Michigan	836	167.2	August 31
Minnesota	412	82.4	August 31
Missouri	429	85.8	August 31
Montana	68	13.6	June 30
North Carolina	968	193.6	August 31
North Dakota	40	8	August 28
Nebraska	175	35	August 15
New Hampshire	39	7.8	August 26
New Jersey	540	108	August 31
New Mexico	223	44.6	August 19
Nevada	352	70.4	August 10
New York	2,027	405.4	September 4
Ohio	837	167.4	August 15
Oregon	294	58.8	September 3

Pennsylvania	1,166	233.2	August 31
Rhode Island	66	13.2	August 31
Utah	198	39.6	August 31
Virginia	791	158.2	August 30
Vermont	35	7	August 29
Washington	507	101.4	August 31
Wisconsin	401	80.2	August 28
West Virginia	202	40.4	August 20
Total	20,420,000	4,084,000	

Source: USDA-FNS. State deadlines were taken from state Summer EBT administering agency websites.⁴

When all Summer EBT participating states are added up, the households an estimated 4,140,000 children will need to complete an application.

Four states do not allow Summer EBT eligibility based on a household receiving Medicaid. The following states do not accept Medicaid enrollment for Summer EBT eligibility: Kansas, Missouri, Washington State and Hawaii. The state of Kansas-Department of Children and Families (DCFS) offers a reliable estimate for the number eligible families that must submit a Summer EBT application in the other three states. Last summer, 55% of eligible families were required to submit an application and 46% were automatically eligible.⁵

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 applications⁶. 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 Information Act (FOIA) requests were sent out to 24 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 2024 program deadline.

⁴ More detailed information with links to state websites can be found at <https://www.propel.app/summer-ebt/>

⁵ <https://kansasreflector.com/2025/04/23/more-than-138000-kansas-children-miss-out-on-free-summer-meals-despite-eligibility/>

⁶ "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.

Chart 2: Applications submitted for the Summer EBT 2024 program⁷

States Sampling⁸	Potential Applications	Applications Submitted	Percentage applications submitted	Total Potential Dollars
Arizona	110,000	4,926	4.4%	\$13,200,000
Colorado	67,400	25	.003%	\$8,088,000
Connecticut ⁹	54,600	3,173	5.8%	6,552,000
Kansas ¹⁰	138,000	5,686	4.1%	\$23,160,000
Louisiana	118,800	10,973	9.2%	\$14,256,000
Massachusetts ¹¹	103,000	21,635	21%	12,360,000
Maryland	100,000	12,978	13%	12,000,000
Minnesota	82,400	221	.26%	\$9,888,000
Missouri ¹²	218,000	24,299	11%	\$26,160,000
Nebraska	35,000	3,103	8.8%	\$4,200,000
New York	282,000	17,158	6%	\$33,840,000
Nevada	70,400	6,347	9.0%	\$8,448,000
New Mexico	44,600	4,088	9.1%	\$5,352,000
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
Washington	101,400	10,429	10.2%	\$12,168,000
Wisconsin	80,200	3,566	4.4%	\$9,624,000
Total	2,200,000	180,117	8.1%	\$270,600,000

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 and Missouri 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.

⁷ The chart was updated in March and April to include FOIA responses received from Massachusetts, Connecticut, Maryland Nevada and Minnesota.

⁸ 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.

⁹ Connecticut Department of Social Services: "This number is not de-duplicative as some families submitted multiple times".

¹⁰ 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).

¹¹ Massachusetts Department of Transitional Assistance (MDTA): 21,635 applications were submitted and 4,234 school children were determined eligible and approved for the \$120 Summer EBT 2024 benefit".

¹² 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. 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.¹³ This estimate is not etched in stone. Effective statewide outreach efforts can make a big difference with increasing participation¹⁴. Prior to start of the Summer EBT 2024, USDA-FNS warned that only through robust communication will families know about the application option¹⁵. 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)

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 documentation¹⁶.



¹³ **Federal Register** / Vol. 88, No. 249 / Friday, December 29, 2023 / Rules and Regulations

¹⁴ <https://www.nga.org/publications/sun-bucks-basics-for-governors-a-summer-ebt-program-primer/>

¹⁵ **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

¹⁶ 3% of families that submit an application will be part of a income verification sampling conducted by the state agency.

5. **USDA-FNS Summer EBT Guidance for submitting applications (12-31-2024)**¹⁷

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\(e\)](#)]

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.

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

¹⁷ <https://www.fns.usda.gov/sebt/questions-answers>

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)].

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.




All Summer EBT participating states maintain a webpage with current information. Also, the [FRAC-Summer EBT](#) or [No Kid Hungry](#) websites have updated information and toolkits.

SUMMER EBT provides certain families with financial support to buy food for their children in the summer.

\$120
PER CHILD