

CODE *for*
AMERICA

 **NO KID
HUNGRY**

December 2023

Summer EBT Playbook

How to implement a human-centered
Summer EBT program in 2024 and beyond

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Executive Summary

Code for America and No Kid Hungry developed the Summer EBT Playbook as an actionable technical resource for state agencies who are engaged in Summer EBT implementation for 2024 and beyond. The recommendations and practices highlighted throughout this resource come from primary research with eligible parents/guardians and families, state agency leaders, and advocacy and policy organizations. The playbook is designed to be relevant to all states and jurisdictions implementing Summer EBT programs.

The playbook focuses on the key data and technology systems needed to deliver a human-centered Summer EBT program. The playbook does **not** cover the topics of securing funding and creating staffing plans for Summer EBT programs in depth, but makes general recommendations.

What's included:

- [Recommendations for school data aggregation](#)
- [Best practices for data matching and deduplication](#)
- [Tips for creating an effective online Summer EBT application](#)
- [Best practices for digital outreach and customer support](#)
- [Tips on working with vendors to ensure client-centered Summer EBT outcomes](#)

This resource will be helpful to you if:

- You feel daunted or uncertain about the **data and technology** aspects of Summer EBT implementation, and you want **guidance on what to prioritize first** to get Summer EBT off the ground in 2024.
 - ▶ *Key sections:* [Setting your state up for success in 2024 versus 2025 and beyond](#)
- You want to check whether you've thought through the **major data management processes** as you draft your Summer EBT plan to submit to the Food and Nutrition Service (FNS).
 - ▶ *Key sections:* [Summer EBT checklist](#)
- You want **tips or best practices for a specific Summer EBT technical challenge**, such as data deduplication or digital client outreach.
 - ▶ *Key sections:* [Anticipated Summer EBT challenges and recommended solutions](#)
- You want an **idea of what to aim for in the longer-term, in order to work towards human-centered Summer EBT benefits delivery**.
 - ▶ *Key sections:* [Setting your state up for success in 2024 versus 2025 and beyond](#)
- You implemented the Pandemic EBT program and want to know **what aspects of Summer EBT can be adapted from Pandemic EBT versus those that need new investment**. Although not identical to Pandemic EBT, Summer EBT has many of the same challenges.
 - ▶ *Key sections:* [Summer EBT versus Pandemic EBT](#)
- You are **just starting to wrap your mind around Summer EBT** and want to understand how to approach it.
 - ▶ *Key sections:* [Summer EBT 101](#) and [Planning your Summer EBT program](#)

Who created this playbook:

CODE *for* AMERICA

Code for America, a nonprofit founded in 2009, believes that government can work for the people, and by the people, in the new digital age. We work with government at all levels across the country to make the delivery of public services equitable with technology. We work with community organizations and governments to build digital tools, change policies, and improve programs. Our goal: a resilient government that effectively and equitably serves everyone. Learn more at codeforamerica.org.



No Kid Hungry. No child should go hungry in America. But millions of kids in the United States live with hunger. No Kid Hungry is working to end childhood hunger by helping launch and improve programs that give all kids the healthy food they need to thrive. This is a problem we know how to solve. No Kid Hungry is a campaign of **Share Our Strength**, an organization committed to ending hunger and poverty. Learn more at NoKidHungry.org.

How this playbook was developed

In August 2023, Code for America conducted in-depth interviews and surveys with Supplemental Nutrition Assistance Program (SNAP) and Child Nutrition (CN) state agency leads from 25 states and the District of Columbia as well as several local school district administrators to better understand the major data and technology challenges that states and school districts face in implementing the new permanent Summer EBT program. Through this research, we identified seven key factors that will play a critical role in determining how well a state can deliver a human-centered Summer EBT program:

1. Degree and complexity of coordination with school data sources
2. Ability to acquire and deduplicate data for streamlined certification
3. Size of Summer EBT application pool
4. Maturity of statewide Summer EBT application process
5. Strength of state agency's relationships with schools
6. Design of benefits delivery and benefits management
7. Maturity of community outreach and customer support processes

These seven factors inform the step-by-step guidance and recommendations offered in this resource. We also recognize that funding and broader political context will influence each state's decision to implement Summer EBT. Given the wide range of state contexts, however, we do not address those issues in depth in this playbook, which is meant to serve as a broadly useful resource.

Summer EBT 101

Summer EBT was established as a permanent, nationwide program by the Consolidated Appropriations Act of 2023. The program aims to reduce summer hunger by providing families with a grocery benefit similar to SNAP to feed their children when school is not in session. It was first piloted in 2011 in select states and proved [so successful](#) at reducing food insecurity and improving diet quality that it was slowly expanded to additional states. The summer component of Pandemic EBT, which operated on a similar model as Summer EBT and took its place from 2021–2023, also proved successful in supporting families. Pandemic EBT ended in summer 2023 following the end of the COVID-19 public health emergency, but beginning in 2024, all states and territories can participate in Summer EBT.

Summer EBT eligibility

In general, **children who are income-eligible, able to be directly certified, or categorically eligible for free or reduced price (FRP) school meals are eligible for Summer EBT.** Some children may be eligible for Summer EBT without attending a school that participates in school meals programs; other children who attend schools that do participate will be eligible for Summer EBT without having been specifically certified for FRP meals. The Food and Nutrition Service (FNS) has [laid out](#) two main pathways for confirming eligibility for Summer EBT:

- 1. Streamlined Certification:** Streamlined certification is similar but distinct from direct certification in the National School Lunch and School Breakfast Programs (NSLP and SBP). The idea of streamlined certification is to ensure that as many children as possible receive Summer EBT benefits automatically without parents/guardians having to take any direct action (i.e., submitting an application).¹ Streamlined certification includes:
 - School-age children² who are **able to be directly certified** because of their participation in other public assistance programs. This includes SNAP, Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR), and Medicaid.³ States not participating in direct certification with Medicaid (DC-M) may petition FNS to be able to use Medicaid for streamlined certification in Summer EBT.
 - School-age children who are **categorically eligible** for free or reduced price meals based on their participation in Head Start, or because of their homeless, foster, migrant, or runaway status. This is referred to as “Other Source Categorical Eligibility” in the Eligibility Manual for School Meals (see [here](#)).
 - Children who have **already been approved for free or reduced price meals through direct certification, categorical eligibility, or by filling out a school meals application** are automatically eligible for Summer EBT and must receive benefits without further application.

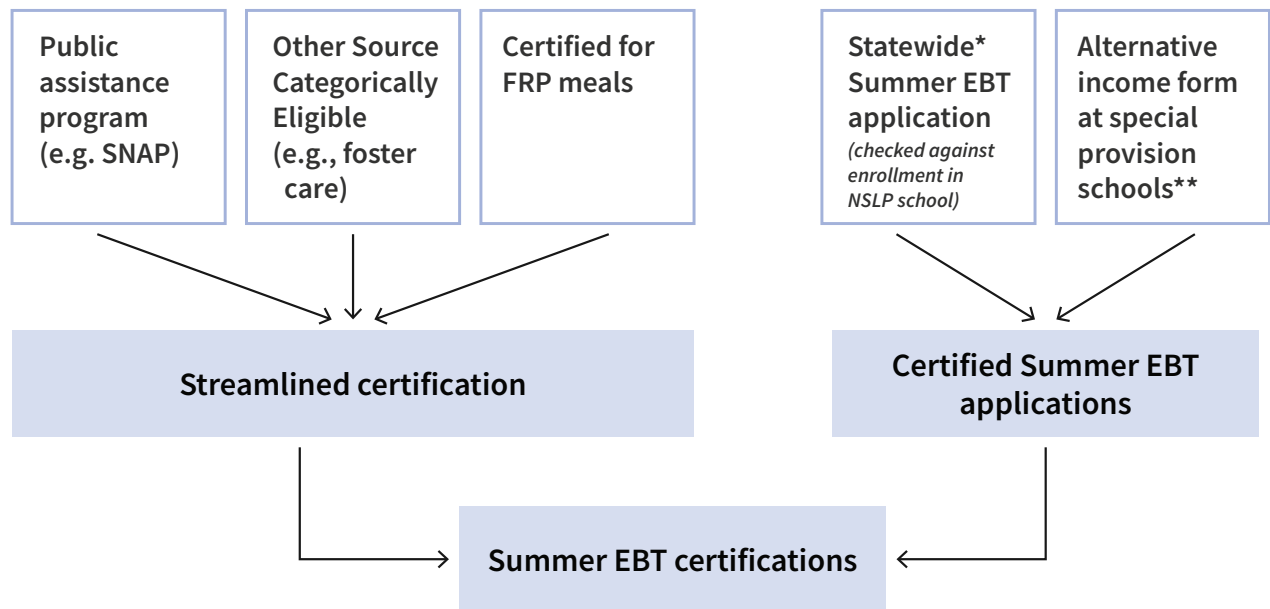
¹ Streamlined Certification was defined in the FNS webinar on August 4th, 2023. It is also mentioned in Footnote 1 of the July 31st, 2023 policy [memo](#), and is further mentioned in the Interim Plan for Operations and Management Template found [here](#).

² This term will be defined by USDA in the Summer EBT Interim Final Rule (IFR)

³ Children on Medicaid with household income under 185% of FPL. More information about direct certification with Medicaid (DC-M) demonstration states is [here](#).

2. Summer EBT Application: Children who cannot be certified through any of the pathways listed above will have to apply for Summer EBT benefits. States will not be required to make a statewide application available until 2025, but they are encouraged to do so now. States will have to check that each student who applies for Summer EBT attends an NSLP or SBP-participating school. States have the option of using other forms to obtain the information necessary for a Summer EBT application, such as school meals applications, integrated benefits applications, or the alternative income forms used in some special provision schools,⁴ as long as they meet the minimum requirements of a Summer EBT application.⁵ These options allow applications to be collected in a routine fashion in advance of the summer period, potentially reducing confusion among families and the number of applications received near the end of the school year.

Figure 1: Overview of eligibility pathways for Summer EBT



* Statewide applications are required only after 2024.

**According to FNS, alternative income applications will be able to be used for Summer EBT beyond 2024 if they meet the minimum requirements for a Summer EBT application. In 2024, income forms that DON'T meet the minimum requirements will be allowed. Beyond 2024, states will need to work with local education authorities (LEAs) to modify their forms to meet Summer EBT requirements. Other forms that meet the minimum requirements may also be used, such as dual-branded school meals applications.

4 Special provision schools include [Community Eligibility Provision \(CEP\)](#) and [Provision 2 or 3](#) schools that have adopted one of three alternative federal reimbursement models that require schools to (1) serve meals to all students at no cost and (2) forgo annual collection of FRP applications. Provisions 2 and 3 require collection of FRP applications every four years rather than every year.

5 See FNS' July 31 policy memo on [Summer EBT Eligibility](#), and the [Schools Meals Manual](#) for guidance on income information used to determine eligibility. In 2024, forms with that information may be used as-is, even if they do not meet the minimum requirements of a Summer EBT application.

Summer EBT versus Pandemic EBT

State agency administrators may be wondering how systems and processes developed for Pandemic EBT might be able to be repurposed for Summer EBT in 2024. Here are the differences that will have the largest implementation consequences for Summer EBT:

- Agencies are *required* to automatically issue benefits to a large body of children *without further application*. In early Pandemic EBT, many states used applications to fill in fields like parent/guardian or up-to-date mailing addresses; this is no longer an option with Summer EBT.
- School-aged students “able to be directly certified” are eligible for Summer EBT, *regardless of their school enrollment status*. States should use statewide public assistance program databases and any statewide categorical eligibility databases that might exist to identify as many eligible children as possible, instead of solely relying on FRP certifications sourced from school food authorities (SFAs).
- Children in special provision schools who are not captured through streamlined certification will need to apply for Summer EBT. Thus, extra effort will be needed to ensure that eligible students in special provision schools are able to access Summer EBT benefits. States using alternative income forms to address this challenge will also need to develop systems to collect and aggregate that data at the state level.
- After 2024, states will be required to have a statewide application for Summer EBT and the ability to check at the state level that Summer EBT applicants are enrolled at NSLP/SBP schools.
- See the [appendix](#) for a more detailed comparison of Summer EBT and Pandemic EBT

Agencies developed many Pandemic EBT solutions to meet their immediate needs from 2020–2023, and did so without the expectation that the program would become permanent. Here are some considerations when thinking about how your state might build upon existing Pandemic EBT systems, especially when budgeting for the new permanent program:

- **Summer EBT application:** If a statewide Pandemic EBT application was created, it can likely be modified to work with Summer EBT. States must ensure that it meets the [minimum requirements](#) of a Summer EBT application.
- **School data aggregation:** If you have mature, reliable systems and processes to aggregate FRP data at one of the Summer EBT agencies, that can likely be extended. If you built an upload portal for SFAs to provide school data, modify it to work with all school enrollment where FRP certifications are an additional field. We encourage states to move towards a single statewide database for school enrollment and FRP data, which will represent a new investment for many states. By 2025, this will be a requirement, as Summer EBT agencies will have to establish and maintain a statewide database of children who are enrolled in NSLP- or SBP-participating schools.

- **Mailing addresses:** Systems that allow families to provide updated mailing addresses will remain useful. Families moving frequently during the school year or providing inaccurate mailing addresses was a significant issue during Pandemic EBT, and will continue to be relevant for Summer EBT.
- **Benefit delivery:** Benefit delivery systems that were effective during Pandemic EBT can likely be repurposed with minimal modification. See [this section](#) for recommendations on benefit delivery design.
- **Case management:** P-EBT case management systems can likely be reused in the short-term. However, in the longer-term states will likely want to build a case management system specifically for Summer EBT or modify their SNAP case management system to integrate Summer EBT cases. See [this section](#) for discussion of these two options and more considerations when creating a Summer EBT case management system.
- **Data sharing:** In many states, the data sharing agreements and inter-agency processes established between agencies can be updated or repurposed for Summer EBT. However, it's important to note that the addition of streamlined certification as a requirement for Summer EBT introduces some significant differences in data processing that states will need to consider and plan for. See [this section](#) for more details on streamlined certification.



Planning and implementing your Summer EBT program

This section will provide step-by-step recommendations and guiding questions to help Summer EBT agencies implement a human-centered program in 2024 and beyond.

1 The Basics	2 Eligibility and Data Systems	3 Community Education and Client Support	4 Benefits Delivery
<ul style="list-style-type: none"> <input type="checkbox"/> Decide on division of roles between agencies <input type="checkbox"/> Estimate population of children eligible <input type="checkbox"/> Develop an administrative plan <input type="checkbox"/> Put in place necessary legal agreements between agencies <input type="checkbox"/> Lay a foundation for collaboration between agencies and schools 	<ul style="list-style-type: none"> <input type="checkbox"/> Set up systems to collect necessary enrollment and FRP data from schools <input type="checkbox"/> Set up data processes for streamlined certification <input type="checkbox"/> Create or plan for a statewide Summer EBT application <input type="checkbox"/> Match and deduplicate client data across all sources 	<ul style="list-style-type: none"> <input type="checkbox"/> Develop a community outreach plan in partnership with schools <input type="checkbox"/> Use digital and non-digital channels to reach clients <input type="checkbox"/> Set up client support processes (self-service and human support) 	<ul style="list-style-type: none"> <input type="checkbox"/> Implement opt-out procedure <input type="checkbox"/> Create or modify benefits delivery system and case management system <input type="checkbox"/> Notify families of benefits approval and time window to use benefits <input type="checkbox"/> Implement verification for cause <input type="checkbox"/> Set up fair hearing and appeals process for clients
<p>You can find a more detailed checklist of key planning questions to review with your team here.</p>			

What is human-centered program delivery?

Human-centered programs are designed and implemented around what the people interacting with them need and how they actually behave. For Summer EBT, this means designing the program implementation in a way that puts the needs of eligible families first. “Behind the scenes” systems and processes are what enable families to have easy, clear, and dignified interactions with Summer EBT. Of course, caseworkers and program administrators are people, too, and human-centered program implementation also takes into account state staff needs. When delivered effectively, a human-centered Summer EBT program will give families an easier time finding, accessing and maintaining benefits and give state staff an easier time delivering benefits.

Learn more about human-centered program delivery:

- [Blueprint for Human-Centered Safety Net](#) (Code for America)
- [Introduction to Human-Centered Design Tools and Methods](#) (18F.gov)
- [Human-Centered Design for Customer Experience](#) (performance.gov)

From a human-centered perspective, here are long-term goals that we recommend aiming for when planning for Summer EBT in 2024 and beyond:

- **Automatic enrollment of eligible children through streamlined certification is executed with as few complications or errors as possible.**
- **As few people have to proactively and specifically submit Summer EBT applications as possible.**
- **Families know that Summer EBT exists, whether they are eligible, and whether or not they need to apply.**
- **Parents/guardians who have to apply for Summer EBT can do so easily and in their own language.**
- **Parents/guardians who have to apply for Summer EBT have their school enrollment data matched with low error rates.**
- **Families receive their Summer EBT benefits in a timely manner during the summer period.**
- **Parents/guardians can easily and quickly have their questions about Summer EBT resolved; Summer EBT program staff and schools are not unnecessarily burdened by a flood of customer support inquiries.**

It's important to note that taking a human-centered approach to your Summer EBT program is not an all-or-nothing decision; even states that feel very unprepared or under-resourced for Summer EBT can take incremental steps towards program delivery that is easier for families and for agency and school staff. This playbook is intended to help you move in that direction, regardless of where your state is starting from.

We recognize that for many states, these goals feel well out-of-reach for 2024—that's okay. Many states are focused on what a "good enough" Summer EBT program looks like in the near-term, while planning for longer-term sustainability. We encourage you to treat these as "blue sky" goals to gradually work towards over time. Keeping these goals in mind from the beginning can help your state plan for the programmatic and technology investments needed to make Summer EBT successful over the long term. See our [summary](#) of short-term approaches for 2024 versus longer-term solutions to work towards for 2025 and beyond.


What does a human-centered Summer EBT experience look like?

Families will have different experiences of Summer EBT enrollment and access depending on whether they are automatically enrolled via streamlined certification or whether they need to apply for the program. The majority of eligible children should be enrolled through streamlined certification, rather than through Summer EBT applications. However, in all cases families will need to:

- Know about the Summer EBT program
- Understand if they are eligible and whether they need to take action to receive benefits
- Understand how to use those benefits once they arrive

Figure 2-3: Examples of a human-centered Summer EBT family experience via streamlined certification and via application

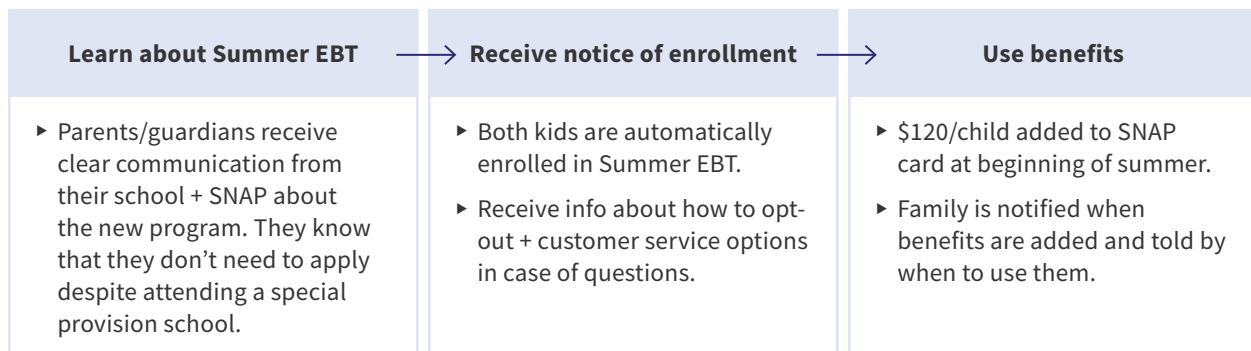
Summer EBT automatic enrollment journey



Family profile:

- Two school-aged kids
- Primary language is Spanish
- Currently on Medicaid and SNAP
- Enrolled in a special provision school
- Income-eligible for Summer EBT

Human-centered client experience



Example barriers to delivering a human-centered client experience

<ul style="list-style-type: none"> ▶ Non-existent, limited, English-only, or late communication means that they apply without needing to, creating burden for state 	<ul style="list-style-type: none"> ▶ Inaccurate deduplication Medicaid and SNAP lists causes overissuance ▶ Confusion for families about replayment 	<ul style="list-style-type: none"> ▶ No system to notify family of new benefits before or upon issuance ▶ Benefits get added to card after summer ends
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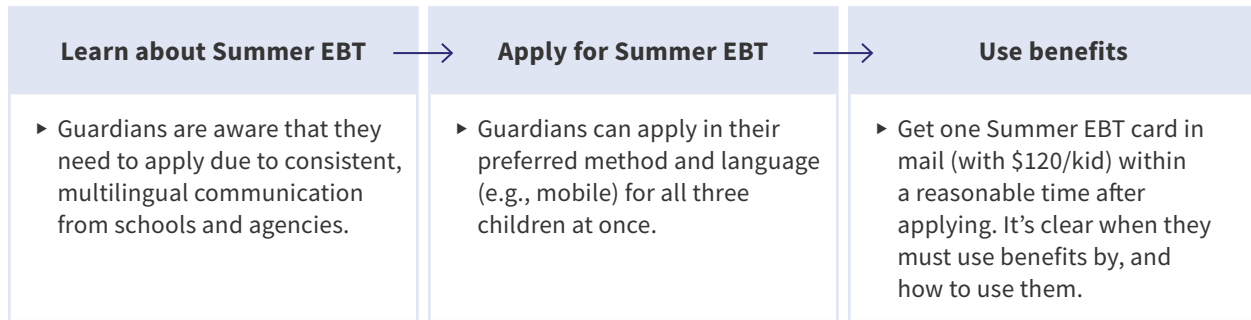
Summer EBT enrollment via application journey



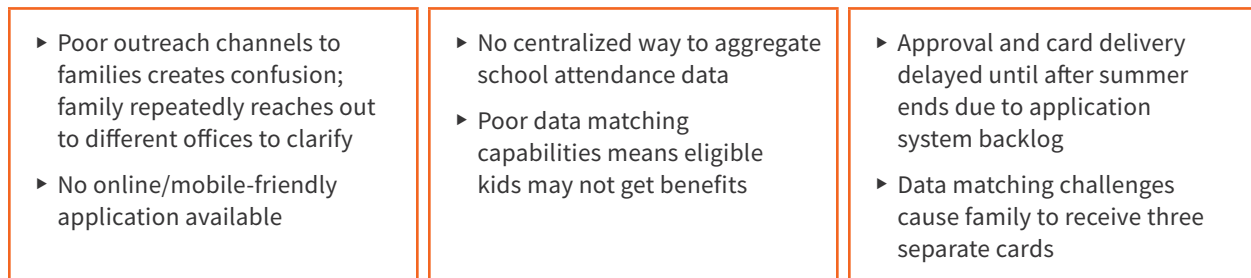
Family profile:

- Three school-aged kids
- Not enrolled in any means-tested programs
- Enrolled in a special provision school
- No alternative income forms collected
- Income-eligible for Summer EBT

Human-centered client experience



Example barriers to delivering a human-centered client experience



Step 1: Lay the foundation for a successful Summer EBT program in 2024 and beyond

Quick Checklist:

- Has the state’s 50% administrative funding match been secured?
- How will you divide up key roles and responsibilities among Summer EBT agencies?
- What legal agreements will be necessary to execute between agencies at the state and local levels?
- Has a staffing plan for Summer EBT been developed at all partner agencies?

1. Decide agency roles and responsibilities between partnering Summer EBT agencies

A key challenge of Summer EBT for many states, beyond funding and staffing, is the degree of collaboration required among agencies. By staying focused on the shared north star goal—getting food in the hands of families as seamlessly as possible—you can ensure that collaborating agencies have aligned motivations and shared urgency in working together to limit and overcome bureaucratic hurdles.

States have considerable flexibility in choosing how responsibilities will be divided among agencies to administer Summer EBT; they are encouraged by FNS to find what works best. **Regardless of the division of roles between agencies in your state, inter-agency collaboration will be critical.** All relevant agencies (potentially beyond just SNAP and Child Nutrition) will need to work closely to coordinate processes and communications that are clear, efficient, and respond to families’ needs.

States will have to choose one agency to be the “coordinating agency” for Summer EBT, which will enter into a written agreement with and be the primary point of contact for the Federal Nutrition Service (FNS); Other collaborating agencies are referred to as “partnering” agencies.⁶ In most cases, the coordinating agency will be either the SNAP agency or the Child Nutrition agency, but FNS has encouraged states to make the decision that works best for their situation.

⁶ See this [memo](#) for more details on “coordinating” agency expectations. It is possible that a state might decide that the coordinating agency will take on a larger set of day-to-day Summer EBT administration responsibilities, but this is in no way required or expected by FNS.

In general, the key responsibilities that all collaborating Summer EBT state agencies will need to decide how to divide up among themselves are:

- Summer EBT case management
- EBT distribution and loading
- Benefit replacements
- Customer support
- Verification for cause (2024 only)⁷
- All verification tasks (2025+)
- School data aggregation from local educational authorities (LEAs) and school food authorities (SFAs)
- Database management for school data
- Summer EBT statewide application (not required until 2025)
- Confirmation of school enrollment against Summer EBT applications
- Processing updates to school enrollment, FRP status, and mailing addresses
- Data collection and data deduplication for streamlined certification
- Community education, outreach, and communication with parents and schools
- Appeals and fair hearings



⁷ According to this [memo](#), Summer EBT applications received “for children enrolled in CEP, or Provision 2 or 3 schools that are not in their base year prior to Summer 2024, will be subject to verification for cause”. No additional verification tasks specific to Summer EBT applications are specified, and additional verification requirements beginning in 2025 will be defined in the upcoming IFR.

GOAL: Strong, positive inter-agency relationships that support a smooth and adaptive implementation of Summer EBT and meet the needs of families.

- **Align early on a vision of success.** We suggest that collaborating Summer EBT agencies take time early on to discuss big-picture questions such as:
 - ▶ What is the ideal experience that we want to build for families interacting with Summer EBT?
 - ▶ How can our agencies collaborate more effectively to support families to have a straightforward, low-stress Summer EBT experience?
 - ▶ How can we build on strategies that have worked in the past?
 - ▶ How can we move as quickly as possible in our decision-making without delaying benefit delivery?
 - ▶ How can we design processes and systems that minimize unnecessary effort or confusion within and between our state agencies?
- **Ensure there is a lead project/program manager** who has oversight of the big picture, can track the progress of various components of creating a Summer EBT program, and can flag needed expertise, support, or challenges as they arise. See [here](#) and [here](#) for relevant project/program manager considerations.
- **Be ready to pull in the right people.** For example, if technical staff are needed to detail how systems work and they might communicate, make sure both agencies have them participate. Consider when core expertise from each collaborating agency (such as legal and policy, data systems, data architecture, technology and IT systems, user research, and customer service and engagement) might be needed.
- **Create space to collectively clarify roles and responsibilities across agencies and staff as early as possible.** Shared understanding for all involved agencies and staff will mean less confusion and disagreement down the road.
- **Plan cross-agency sessions to understand and define the meaning of different terms, data, information, and systems that exist between each agency.** Cross-agency projects involving data sharing between two or more agencies require that everyone involved understands the sources and limitations of all the data, and is clear on when and how different handoffs will take place.

- **Draw upon existing strengths and expertise.** Here are a few considerations when deciding how you might divide responsibilities among different agencies:
 - ▶ SNAP agencies already have experience handling EBT cards, benefit replacements, and appeals, as well as building a case management system, providing ways to check benefit amounts, giving guidance around how to use SNAP benefits, and running a client support center.
 - ▶ Child Nutrition agencies likely have strong existing relationships with school districts and local education agencies, which can be helpful when working with schools to source any address changes, getting complete school data in a timely fashion, and conducting coordinated education about Summer EBT to families. Child Nutrition agencies also have experience with the FRP application verification process.
 - ▶ From a data perspective, there is no strong reason to choose one type of agency over the other to lead on data management processes; Data Sharing Agreements (DSAs) and Memoranda of Understanding (MOUs) can be executed to allow the necessary data to be gathered at either agency.

2. Develop a budget and staffing estimate for Summer EBT

The new Summer EBT program requires administrative costs to be a [50/50 match between federal and non-federal funds](#), which means states will need to secure half of their administrative budget needs, likely through state funds. Budgeting to administer a new federal nutrition program will vary for each state based on your unique circumstances and set-up. Due to this extensive variation, this playbook does not focus in detail on budget development or staffing plans for Summer EBT. However, we offer a few starting considerations below.

Budgeting recommendations:

- Some states are relying on Pandemic EBT administrative costs to inform their Summer EBT administrative cost estimates, which is [supported by the USDA](#). Another starting place for developing a budget is to consider how administrative funding is typically determined in SNAP (which, similar to Summer EBT, requires a 50/50 match between federal and state sources for program administrative costs). SNAP administrative costs are generally estimated to be roughly 10% of the total amount of benefits issued (so if total benefits issued are \$1 million, administrative costs would be \$100,000).
- Estimating the total number of children likely to be eligible and issued benefits can help with determining a baseline for administrative costs. Looking at school enrollment information and Free and Reduced Price Eligibility for 2022–2023 can be a good starting point. FNS estimated numbers are available [here](#). We know that benefits for each participating child will be \$120 per summer. Here's the calculation:

- ▶ Total number of eligible children⁸ x \$120 = Total Summer EBT benefits
 - ▶ Total Summer EBT benefits x 10% = Administrative cost estimate
- There are additional likely administrative costs for Summer EBT as a new program such as creating new data systems, changes to current data systems, an application, and the initial stand up of a new customer service system. In our research, EBT card costs and changes to EBT vendor contracts have been raised as unexpectedly high costs for operating Summer EBT. The use of third party vendors to support any of the above program administration will also increase costs.
 - Consider what data and technology infrastructure you can build upon from Pandemic EBT. See [here](#) for some high-level considerations to inform that assessment.
 - States are currently working to develop budgets for 2024 and 2025 as best as they are able. [Here](#) is an example of a bill in Colorado appropriating \$3.3 million of state funds for Summer EBT in FY 23-24 to serve an estimated 300,000 children, with an additional \$2.2 million for FY 24-25 and \$2.1 million for FY 25-26.

Staffing recommendations:

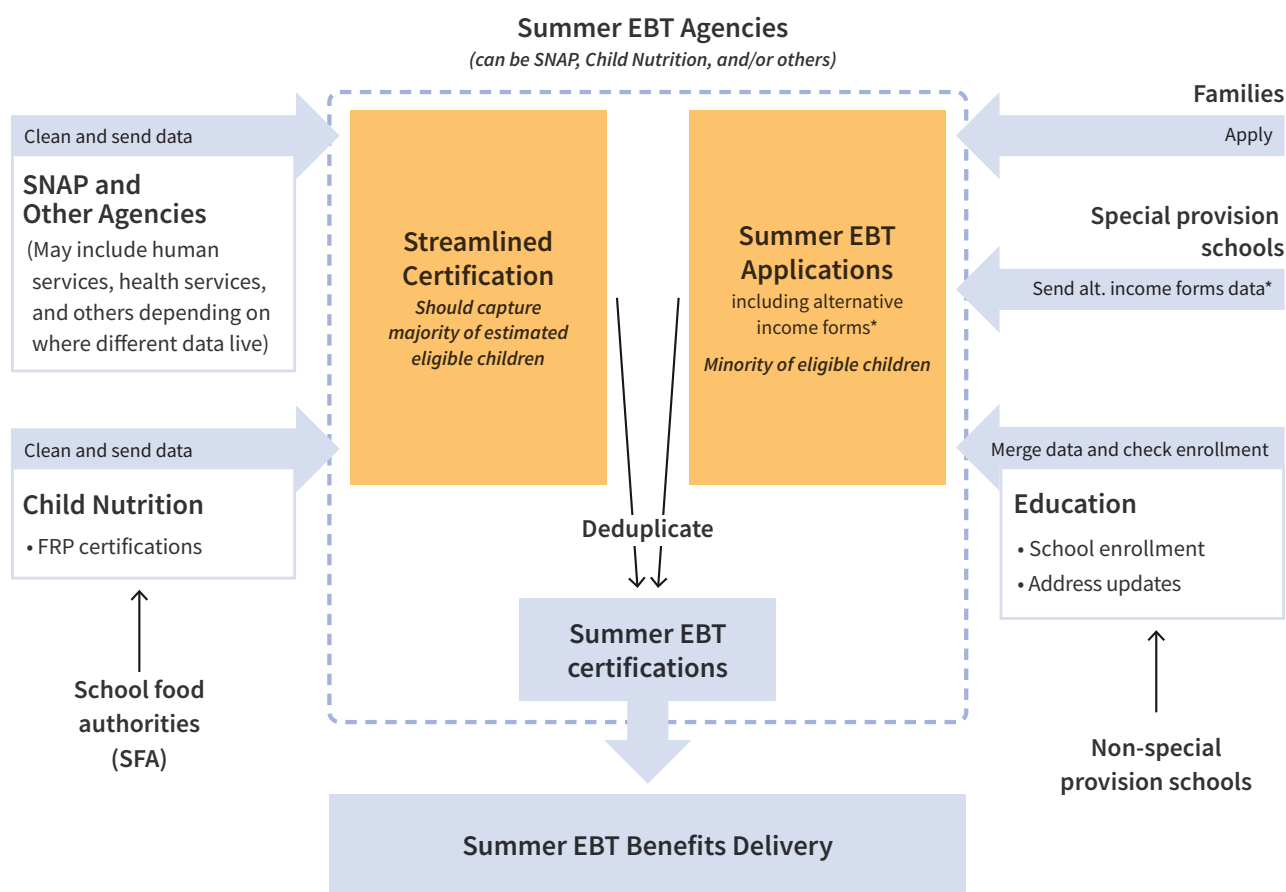
- Staffing is critical to plan and operate Summer EBT. Staff roles will be needed for planning and project management, data management, technology, the application process and verification, case management, outreach, and customer service.
- A dedicated project/program manager at the primary agency is a key role to ensure cross-agency programs move forward and stay on track. The project manager needs to have the authority and access to information and contacts from all involved agencies to move the work along and ensure all components of the program are linked together.
- See the [next section](#) for key staff and roles necessary for moving forward data sharing agreements and processes.
- All collaborating agencies, along with local education agencies (LEAs) and outreach providers, who will be involved in and responsible for different components of the program will likely need dedicated staff time and budget to participate in Summer EBT implementation. Agencies need to build into their budget requests the needs for their collaborating agency and outside partners. For example, funding can go to LEAs to collect and verify Summer EBT applications in 2024 (but not 2025 and beyond).

⁸ See [FRAC's estimates from April 2023](#) for each state of total number of school-age eligible children and total estimate benefit amount

3. Put in place necessary memoranda of understanding and/or data sharing agreements between agencies

A memorandum of understanding (MOU) or a data sharing agreement (DSAs) is necessary in order to share data from one agency to another. For Summer EBT, this will mean likely having data sharing agreements between a Human Service Agency, a Health Services Agency, and an Education Agency. If the child nutrition programs are operated outside of an Education Agency, then likely an additional agency will need to be involved, typically the Agriculture Agency.

Figure 4: Overview of the key processes and interagency handoffs needed for Summer EBT eligibility determinations



* Alternative income applications will be able to be used for Summer EBT beyond 2024 if they meet the minimum requirements for a Summer EBT application. In 2024, income forms that don't meet the minimum requirements will be allowed, provided that they contain enough information to make an income determination for the family.

Recommendations:

MOUs and DSAs are a necessary and important part of the process for interagency collaboration and protecting sensitive information, but they can be hard to execute and take a long time. Here are a few key practices to help with the MOU/DSA process:

- **Leadership buy-in at all involved agencies is critical for ensuring necessary agreements get executed.** Similar cross-agency projects and DSAs, like those that are required for Summer EBT, have benefited when program directors serve as project sponsors for efforts that require cross-agency and program alignment and prioritization. Leaders can be champions in the event that an agreement or data sharing project gets stuck.
- **Invest in a dedicated project/program manager** to monitor all aspects of the data sharing process and ensure the agreement process stays on track. Make sure they have access to all key staff that provide the various expertise needed to execute data sharing. Project/program managers have their eyes on the big picture when keeping track of the components that are required to move things forward. They can identify blockers in the process or pull in additional expertise when necessary.
- **Ensure the right staff and expertise are involved in developing a DSA early on.** DSAs often get held up with legal and policy staff, so ensure that the legal team is aware of the effort, understands the purpose and goal of the data sharing, and is bought in on the big picture why the DSA is needed. They should feel ownership in the overall objectives that the DSA will support, and be part of relevant project meetings.
- **Adapt to your state context.** There are some states that have legal restrictions around sharing school and student data. See [here](#) for tips if that's relevant for your state.

Additional Resources:

No Kid Hungry along with the American Public Human Services Association (APHSA) has supported multiple states in executing cross-program enrollment projects involving data-sharing between multiple agencies. Though these projects primarily involved data-sharing between SNAP and WIC, much of the learning is applicable to any cross-agency effort. Readers looking for more guidance may find the following resources and DSA examples informative:

- [Leveraging Cross-Program Data to Modernize Outreach & Enrollment in SNAP & Connected Benefits](#)
- New Jersey [Data Sharing Agreement](#) for a SNAP/WIC cross-enrollment project
- [Template Data Sharing Agreement](#) originally used for a data-matching project in Virginia that was adapted by Kansas for a SNAP/WIC cross-enrollment project
- [Data Sharing Resources](#) from the Digital Benefits Hub

4. Lay a foundation for collaboration with schools

In order to determine Summer EBT application eligibility, Summer EBT agencies need accurate, timely data from local education agencies (LEAs), which may include school districts, county offices of education, direct-funded charter schools, and special education local plan areas. LEAs also typically have established and trusted communication channels with parents/guardians. Cultivating strong relationships with LEAs will support state agencies to reach families with accurate, timely information about the Summer EBT program, which in turn will reduce the downstream burden on agencies and schools (e.g., avoiding unnecessary customer support inquiries or unnecessary Summer EBT applications). The strength of a state's relationships with schools is a key resilience factor—when technology systems fail, those relationships can help you get through the crisis and still deliver for families.

The strength of your agency's relationships with schools is especially important if...

- **...A large number of eligible children will need to specifically apply for Summer EBT benefits in your state.** In the short term, you will likely need to partner more closely with schools to get Summer EBT applications out to parents/guardians and then to gather accurate school enrollment data to match against Summer EBT applications. Note that the burden on schools can be reduced through an effective statewide Summer EBT application system that is connected to a statewide enrollment database (see [this section](#) for tips on creating a statewide Summer EBT application).
- **...Summer EBT agencies don't have strong, direct outreach or communication channels to potentially Summer EBT eligible students/parents/guardians.** Partnering with schools, which have local networks and local knowledge of good outreach approaches, will help you more effectively reach eligible children and their parents/guardians in 2024. Over the longer-term, we recommend solidifying an effective agency-led outreach and customer support strategy in order to streamline family experience and reduce burden on schools (see [this section](#) for tips on communicating with families).
- **...Summer EBT application processing will be delegated to LEAs in 2024.** In order to ensure smooth processing of applications and data matching against school enrollment, agencies will need to have strong relationships with LEAs. Note that any costs incurred by schools for the administration of Summer EBT will have to be paid by the state and contractual agreements with LEAs will likely be required.⁹

⁹ Reimbursement to schools to LEAs will only be for new activities related to processing Summer EBT applications. If an LEA already uses alternative income forms and plans to use those forms to certify children for Summer EBT in 2024, that would likely not be reimbursable. Other costs incurred by LEAs will also be required to be covered such as Summer EBT outreach or, if applicable, staff to process data. See [this](#) policy memo for more details on administrative funding requirements.

Recommendations for building positive relationships with schools:

- **Bring school stakeholders in early.** Provide clear information to schools as early as possible about the basics of Summer EBT: what the program is, who is eligible, when they will get benefits, etc. Prepare to address concerns school stakeholders might have about the impact of this on special provision schools and/or concerns about competition of Summer EBT with summer meal service.
- **Set clear expectations and points of contact.** Clearly outline expectations and roles for schools ahead of time, as part of the initial planning phase. Be clear which agency manages relationships with schools and who schools need to go to with questions or issues about the program.
- **Train school staff so they can answer customer service questions, but don't actually make them responsible for customer service.** Make sure customer service responsibilities at the state agency level are clear to avoid role confusion and circular routing of families from schools to the state agency call center and then back down to schools. Provide training for school staff (e.g. live trainings, webinars, recorded resources) to learn about the Summer EBT program and how to appropriately route questions from families.
- **Provide clear and accessible info about Summer EBT to families to minimize the burden of parent questions that schools receive.** Get schools' feedback on communication materials and get their advice on how to most effectively reach parents/guardians with the program information, and then use this feedback to inform an agency-led communications and outreach strategy. Regardless of the quality of direct communication from agencies to families, some will likely still go to their schools for information. Equipping schools with the key information families need to know and access to the correct customer service channels to resolve issues will be critical for operating Summer EBT. See [this section](#) on setting up customer support systems for recommendations.

Step 2: Determine who is eligible for Summer EBT

Quick Checklist:

- For households that apply for Summer EBT, how will you confirm student enrollment in a National School Lunch Program (NSLP) or School Breakfast Program (SBP) participating school?
- How will you obtain data for all children who received benefits from assistance programs used in direct certification at any point during the previous school year (e.g. SNAP, TANF, FDPIR, and/or Medicaid)?
- How will you obtain data for all children who had an Other Source Categorical Eligible designation at any point during the previous school year (e.g. foster care, Head Start, migrant, runaway, or homeless)?
- How will you obtain and aggregate at a Summer EBT agency information for students who have been certified for free or reduced price (FRP) meals?
- Which agency or agencies will receive Summer EBT applications, process them, and conduct verification?
- Will you use alternative income forms to determine eligibility for students attending special provision schools in some or all districts?
- How will families be able to keep their information in school data systems up-to-date, such as their mailing addresses and legal names?

There are two main pathways to eligibility for Summer EBT: **streamlined certification and Summer EBT application**. Streamlined certification is intended to capture the bulk of the participating population, because it enables families to receive benefits automatically.

Streamlined Certification

As discussed in the Summer EBT 101 [section](#), there are three main categories of students who must receive benefits *without further application* and be streamline certified:

- Children who are able to be directly certified for FRP meals based on assistance program participation. School-aged children are eligible for Summer EBT whether or not they attend NSLP/SBP schools, while non-school aged students must attend an NSLP/SBP school.

- Children who have Other Source Categorical Eligibility for FRP meals. If they can be identified at the state level, this includes school-aged children who both do and do not attend NSLP/SBP schools.¹⁰ Otherwise, students in this category must attend an NSLP/SBP school.
- All students who have been certified for FRP meals.¹¹ If the above sets of children are fully identified, the unique children this contains are just those who were certified for FRP meals by application.

Summer EBT application

As indicated, everyone else who is income eligible (at or below 185% of FPL) and attends an NSLP/SBP school will have to specifically apply for Summer EBT. In most states, it is expected that streamlined certification will capture most eligible children; Summer EBT applications will be required for a remaining small minority. In particular, this includes students who attend special provision schools who are used to receiving school meals without or with infrequent applications. These families are likely to be surprised and confused about the Summer EBT application requirement, and it will be critical to communicate clearly that an application *will* be required for their children to access the program. However, states do have the option of gathering the information necessary for Summer EBT applications throughout the school year using existing routine data collections, such as alternative income forms (also known as education benefit forms, household information reports, or household income surveys) collected in some special provision schools for the purposes of other program participation or funding allocations.




















The following table illustrates how school attendance impacts eligibility, and consequently the kinds of data that need to be collected.

¹⁰ This is different from Pandemic EBT and from direct certification for FRP meals; those programs both require that a child be enrolled in a participating school to be eligible for benefits. For Summer EBT, by contrast, children who participate in a program that would make them categorically eligible for free meals through NSLP don't also have to be matched to a participating school—they should receive benefits on the basis of their program participation alone.

¹¹ Certifications for income eligibility must be based on Federal NSLP/SBP income limits in order to qualify for Summer EBT. Children who receive free meals through a state-specific program at an income above 185% of the Federal poverty guideline do not qualify.

Figure 5: Overview of sources of eligibility data by school attendance

	Type of School Attendance		
	Non-NLSP or No School	Standard Counting and Claiming NSLP School	Special Provision School
<i>Data to Collect to Determine Eligibility</i>			
Direct Certification <ul style="list-style-type: none"> • SNAP • TANF • Medicaid* • FDIPIR 	School aged  Non-school-aged 		
Other Source Categorical Eligibility** <ul style="list-style-type: none"> • Runaway • Migrant • Unhoused • Head Start • Foster 	School aged  Non-school-aged 		
FRP Applications			 †
Summer EBT Applications			
Alternative Income Forms‡			

* Children on Medicaid with household income under 185% of FPL in approved DCM-F/RP demonstration states

** If known to state or via FRP certification

† FRP meal applications are only collected from Provision 1, 2, or 3 schools in the base years of their provisioning. FRP meal applications are never collected in CEP schools.

‡ After 2024, alternative income forms that do not meet minimum Summer EBT application requirements will not be accepted.

1. Collect necessary data from schools

School data management was a tricky challenge during Pandemic EBT for many states, and likely will continue to be a challenge in Summer EBT. In most states, Summer EBT will require gathering and combining student information from a wide variety of sources (data aggregation) at a Summer EBT agency; Some schools or districts track data in spreadsheets, others might use commercial enrollment or student information systems, and some states have statewide data management systems. Depending on your state's data collection and management approach, the job of aggregating all this data can be quite complex, so we've developed an [in-depth set of best practices for Summer EBT school data aggregation](#).

Summer EBT agencies will need the following data from schools:

- **Lists of students who are certified for free or reduced price meals**, in order to directly issue Summer EBT benefits to them.
- Where available, **forms collected throughout the year** that meet the minimum standard of a Summer EBT application, such as alternative income forms in special provision schools. Exclusively in 2024, alternative income forms can be used that do not meet the minimum standards of a Summer EBT application, provided that they contain adequate information to make an income determination for a household.
- Optional for 2024 and required thereafter, the **lists of students enrolled at NSLP schools** in order to check student enrollment for submitted Summer EBT applications and to identify non-school-aged students who are able to be directly certified.¹²

If you are in a state that has legal restrictions on centralizing or sharing student data, see our tips on workaround strategies for 2024 [here](#).

GOAL: School data is complete and contains all the information needed to issue benefits or check applications

Possible barriers:

States where both FRP lists and NSLP enrollment data are lacking key elements such as addresses, date of birth, or parent/guardian information may struggle to automatically issue benefits to eligible kids.

¹² As an alternative to collecting this data in 2024, applications can be fielded by LEAs directly or states can collect applications and then ask LEAs to check those students that selected relevant schools on their Summer EBT applications. Eligible non-school-aged children can be identified through collecting FRP certifications.

Recommendations for 2024:

- NSLP student enrollment data can sometimes be used to complete FRP lists if the FRP data is stored without critical fields, e.g. parent/guardian. If both kinds of data can be aggregated at Summer EBT agencies, they can be joined together at those agencies and there is no need to have schools do it.

Longer-term recommendations:

- Modify collections and data storage systems to contain all necessary data
- Build a robust student data aggregation pipeline for school data that feeds into a centralized statewide database. FNS has stated that, by 2025, Summer EBT agencies will be required to establish and maintain a statewide database of children who are enrolled in NSLP- or SBP-participating schools.¹³

GOAL: School data is accurate

Possible Barriers:

Mailing addresses are out of date or don't meet state system requirements (e.g., PO Box addresses, addresses on state lines where the child attends a school is one state but whose home address is in another).

Recommendations for 2024:

- Partner with schools to communicate with families before the summer period to gather correct address information.
- Communicate early with local data officers¹⁴ and give them a chance to source better data from families.

Longer-term recommendations:

- Explore expanding program or system requirements to allow a wider set of address types (e.g., many families in rural areas use PO Boxes to receive mail).
- Provide options for self-service address updates between first notifying families and issuing benefits.

¹³ According to FNS, "the database should include, at a minimum, a child's name, date of birth, school or district where they are enrolled, mailing address, their individual free or reduced price eligibility status (as applicable), and any other information needed to match children and prevent duplicate issuances." Link to 11/21/23 Summer EBT Q&A document.

¹⁴ "Data officers" are individuals assigned at each school or LEA whose responsibilities include preparing data for aggregation by exporting and manipulating it, transmitting it, and answering any questions about that data that might arise from the Child Nutrition or responsible Summer EBT agencies. They are usually staff engaged for other purposes and the data officer role is an addition to their normal duties. Note that any costs incurred by LEAs for Summer EBT administration, including staff to process data, will be required to be covered by the state. See [this](#) policy memo for more details on administrative funding requirements.

GOAL: School or district staff are able to prepare their data for smooth aggregation and upload it.

Possible Barriers:

- Unnecessarily strict data format requirements or unclear validation requirements, such as unexpected illegal characters (e.g. apostrophes).
- Data officers lack familiarity with data manipulation tools or techniques.

Recommendations for 2024:

- Prioritize data aggregation methods that rely on existing technology available to the state and that are likely to be relatively familiar to local data officers. One option is to have local data officers upload Excel or comma separated value (csv) files of NSLP school enrollment data or FRP lists to a secure cloud file storage service (ideally one that is FedRAMP-compliant, such as Box). Other simple options include secure email providers or SFTP servers.
- Reflect on any challenges that arose during Pandemic EBT regarding data submissions not conforming to program requirements and use those lessons to design a more effective approach. Let LEAs and local data officers know as early as possible about any requirements for their data submissions, including file formats, schema, and validation.
- Create templates for expected data format and communicate clearly about validation requirements. Make sure to try out and get feedback on the templates from schools and data officers to spot any issues before rolling it out to all schools.
- Give LEAs training on how to prepare and clean their data, and, if applicable, provide sample code or macros to help clean data.
- Use column names, not column numbers or order, to identify data elements.
- Establish a way for data officers to get in touch with a designated contact at the agency responsible for data aggregation, and create secure listservs or internal help forums that data officers can use to troubleshoot together. Host rapid training and periodic “office hours” for data officers.

Longer-term recommendations:

- Create an upload portal for local data officers with real-time validation of the student data submitted.
- Invest in flexible data ingestion systems that can make sensible guesses and get confirmation, such as trying a wide variety of date formats when parsing a column or comparing the values to likely first names.
- A full set of Summer EBT data aggregation best practice recommendations can be found [here](#).



GOAL: Local data officers are able to spot and correct problems in submitted data

Possible Barriers:

- A lack of timely feedback to data officers about problems in the data they've submitted.
- Only single data files are permitted per site, making it difficult to add or update students. No update procedures are in place or commonly used.

Recommendations for 2024:

- Provide time-delayed feedback by running regularly scheduled scripts that can validate any new files and automatically send the results to the data officer who submitted.

Longer-term recommendations:

- Set up a data validation system to provide real-time feedback on any errors, and establish data quality monitoring protocols.
- Echo data back to local data officers in its ingested form, so that they are able to spot check for errors.
- Include school and district identifiers (if applicable) and allow data officers to update records.

GOAL: School data is aggregated in a timely fashion from all schools

Possible Barriers:

- Some schools might lag behind in submitting their data. Later data collections may not be available for some or all LEAs.
- Collecting data until the end of the school year is complete could delay benefits issuance due to data aggregation and processing time.

Recommendations for 2024:

- If waiting until the end-of-year school data collection is complete would significantly delay benefits issuance, start with an enrollment list from earlier in the year and build in processes to handle students who joined after that date.
- Conduct targeted outreach and assistance for LEAs at risk of late data submission. Talk to schools to find out what might make submission easier, such as standard templates for data submission.

Longer-term recommendations:

- Build more automated systems for school data collection at more centralized levels, such as an upload portal and/or a statewide system and database.
- Provide immediate validation feedback on data as it is aggregated.
- Use dashboards to monitor data sources and their upload statuses.
- See [this resource](#) for in-depth best practices on data aggregation for Summer EBT.

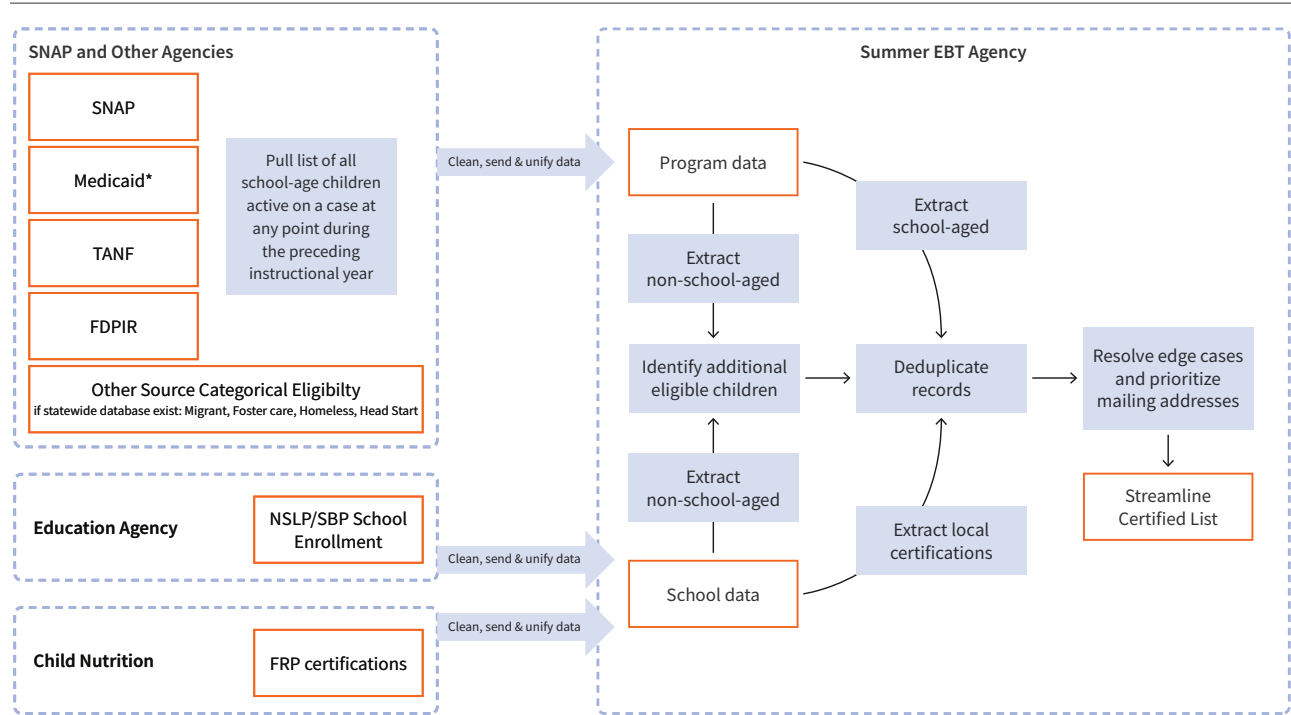
2. Set up new processes for streamlined certification

Setting up a comprehensive process for streamlined certification will likely help states identify the bulk of all Summer EBT participants, reducing the need for families to apply for benefits. Because eligible children may participate in several benefit programs at once, Summer EBT agencies will need effective processes for combining data from multiple sources and removing duplicate records in the data - also known as *deduplication* - to ensure that they are not over-issuing benefits or mistakenly removing eligible children from streamlined certification lists.

Because streamlined certification is likely to make up the bulk of Summer EBT participants in each state, and because states will be required to issue benefits to these children before the summer period, it is a priority for states to establish lasting and accurate procedures to acquire and deduplicate data for streamlined certification.

The following diagram shows an idealized and simplified visualization of the data handoffs that need to take place to perform streamlined certification.

Figure 6: A simplified overview of the recommended data handoffs to perform streamlined certification, with one agency performing deduplication



* Children on Medicaid with household income under 185% of FPL in approved DCM-F/RP demonstration states

Key Considerations

Because data systems and processes vary from state to state, there is not one universal way to perform streamlined certification. However, here are some key considerations to think through when designing your state’s streamlined certification process:

- **Deciding whether to repurpose the direct certification process:**
 - ▶ **Consider creating a new process for streamlined certification.** If possible, we recommend that states establish a new, distinct process for Summer EBT streamlined certification, rather than adapting existing systems for direct certification of assistance program participants for this program. Direct certification for these students works by periodically sending lists of assistance program participants (SNAP in particular) to schools where they are matched against enrollment. Using these lists for streamlined certification would involve rolling them up over the course of a year and sending them to a Summer EBT agency, after which school-aged children who weren’t able to be matched would have to be added back in. Instead, we recommend starting the process with lists of assistance program participants and use direct certification data only to fill in gaps, such as for non-school-aged students.

- ▶ **Identify how you will address the duplicates.** If your state opts to repurpose its direct certification systems for streamlined certification, it's important to consider how and when you'll deduplicate to ensure eligible children get benefits just once and eligible children do not get erroneously dropped from the certification list.
- **Gathering data from various sources:** There are a few specific types of children you will need to decide how to gather information from across different databases:
 - ▶ **Assistance program participants.** Eligible school-aged children in this category can be identified from retrospective database queries that retrieve every child who received benefits at any point in the preceding school year whether or not they attended a SBP/NSLP school. Eligible non-school-aged students can be identified by combining program data and school data, as discussed below. These two groups are indicated by the arrows leading out of program data in the above diagram.
 - ▶ **Other Source Categorical Eligibility program participants.** If a statewide database exists for any program that is comprehensive (such as foster care) they can be treated like the assistance programs above. If any local certifications might also exist, both the local and statewide data should be collected. Otherwise, all of this data will likely need to be sourced from FRP certifications.
 - ▶ **Approved FRP applicants.** By definition this data must come from FRP lists. This set, and the set of certifications for Other Source Categorical Eligibility are referred to as "local" certifications on the diagram above. Note that only children who meet the income thresholds for free or reduced price meals in the NSLP or SBP (at or below 185% of the Federal poverty guideline) should be collected in this group. This is true even if your state provides meals at no charge to children in households above this limit, such as through universal school meal programs.
- **Identifying eligible non-school-aged children:** States need to decide how they will reliably identify non-school-aged children to streamlined certify. We detail below a few tips and considerations.
 - ▶ **Match school enrollment data with program lists.** Although not required for 2024, if school enrollment data is available to a Summer EBT agency, states may identify non-school-aged children for streamlined certification by matching students on retrospective assistance program lists to school enrollment. This process is indicated in the above diagram by the extraction and combination of non-school-aged students from both program and school data.
 - ▶ **Use FRP certifications as a baseline.** Ideally, school enrollment and FRP certifications are stored together in the same data system. If so, additional eligible non-school-aged students can be identified by taking the children who do not have a certification and matching them to program participation lists. If, in 2024, school enrollment isn't aggregated at a Summer EBT agency or if combining school enrollment and FRP certifications is too time consuming, FRP certifications will have to be used by themselves.

- ▶ **Consider using fuzzy comparison methods.** Since school data may not have been filled out with the same level of attention to detail as assistance program applications, restricting matches to those that match exactly is likely to erroneously omit many eligible children. Therefore, we recommend using fuzzy comparison methods instead of exact ones. Fuzzy and exact comparisons are defined when discussing deduplication of streamlined certification data, below.
 - ▶ **Special attention is needed to identify non-school-aged children from special provision schools.** Special provision schools are required to perform a direct certification of students for FRP meals using SNAP only once annually, in contrast to a minimum of 3 times annually in non-provision schools. Because of the low-frequency of this procedure, the FRP direct certification lists for SNAP of non-school-aged children may fail to include many students who should be streamlined certified for Summer EBT. If school enrollment data is not aggregated in 2024, states may want to work with special provision schools to make an extra effort to identify or otherwise certify these children.
- **Cleaning data:** Summer EBT partner agencies need to have processes in place to clean data before sending it to the Summer EBT agency responsible for deduplication.
 - ▶ **Use a standard format.** At a minimum, partner agencies will need to manipulate their data into an agreed-upon, standard format. For example, if data will be exchanged as large tabular files (e.g., spreadsheets), they must have the standardized column names, column formats, and missing value convention.
 - ▶ **If feasible, consider linking records *within* datasets before sending.** An important step in data cleaning is to link duplicates within a dataset where more than one record represents the same child. These duplicates will eventually be consolidated (see below), but it can be beneficial to leverage partner organizations' knowledge of their own datasets when performing this step; otherwise it can be done at the agency performing deduplication. Links can be represented as a list of the pairs of records that should be considered the same people, or (also discussed below) a single dataset with one person per instance but unique values from the identified duplicates preserved as well. Most often, this kind of linkage is necessary for children who move home addresses during the school year and appear in the dataset for a different school and with a different mailing address.
 - ▶ See [this resource](#) for more information on linking records and cleaning data for Summer EBT.

- **Identifying the right data deduplication approach:** Deduplication across all the different data sets will be required no matter what system or process your state uses for streamlined certification. Therefore, it will be important to determine the right data matching technique to use for this deduplication.

- ▶ **Exact comparisons for short-term:** For 2024, a short-term approach we recommend for states who may not have robust deduplication systems in place is to use exact comparisons between records to identify those that are duplicates. [Exact comparisons](#), also known as deterministic or rules-based links, is a strategy that treats records as identical only if all of their characteristics are exactly the same.

It is not sensitive to minor differences in letters, like 'José' and 'Jose' - these would be deemed different people. Unless you have reason to believe it would yield high error rates, we suggest deduplicating with exact matches on first name, last name, date of birth, and ZIP Code. Since every input comes from another program and has been verified in some way, committing widespread fraud specifically for Summer EBT through streamlined certification would be very difficult. Furthermore, the rate at which families erroneously receive additional benefits may be within whatever FNS publishes as a disregard or acceptable error rate in the IFR.

- ▶ **Fuzzy comparisons for long-term:** Exact comparisons are a useful short-term approach for 2024, but they are not recommended for long-term use. For that, we recommend that states deduplicate using at least a [fuzzy comparison](#) method, also known as a probabilistic linkage, in combination with other best practices, such as creating a validation data set and explicitly controlling how often mistakes are likely to be made. Some examples of exact and fuzzy methods used by states when implementing direct certification can be found [here](#).
- ▶ **Go deeper on best practices:** See [here](#) for Code for America's guide on different data matching and deduplication strategies, as well as best practices to aim for.



- **Preserving data and resolving edge cases:** In addition to keeping the essential data necessary for benefit issuance (e.g., child name, child address, parent/guardian name, Summer EBT eligibility, eligibility determination method), states need to decide what data they want to preserve after deduplication that might otherwise be deleted in order to resolve any [edge cases](#) that arise.
 - ▶ **Consider keeping name variations and addresses.** We recommend that the Summer EBT agency responsible for deduplication keeps key data that may be needed to resolve difficult cases such as split custody, children moving during the school year, children falling off of public assistance programs early in the school year, etc. In particular, we recommend preserving all name variations (e.g., “Dan” versus “Daniel”) and multiple addresses for the same child.
 - ▶ **Plan for edge cases and consider what data you will need to resolve them.** Even with solid deduplication processes set up, it is likely there will be some edge cases in the data that need to be resolved. Children can establish eligibility for Summer EBT at any point during the preceding instructional year, which can present tricky data challenges. Preserving data can help with these challenges. For example, having a school’s full FRP list (including direct certification data) can help the responsible Summer EBT agency confirm whether two records that appear similar in the data are in fact the same child or different children.

- **Identify mailing addresses:** Obtaining up-to-date mailing addresses was a common challenge during Pandemic EBT implementation, and will likely remain so for Summer EBT programs. As the program requirements for Summer EBT allow children to establish eligibility throughout the year, simple solutions like preferring the SNAP address when available will not always be effective. States will need to decide how they want to identify the mailing addresses for streamlined certified children.
 - ▶ **Decide how to identify the address that is most likely to be valid.** We recommend using the most-recently supplied address available for a child across all data sources. In the case of multiple addresses provided in the same month, we suggest prioritizing those from public assistance and Other Source Categorical Eligibility programs first, since families generally have more incentive to keep them accurate.
 - ▶ **Consider how you might give families opportunities for address confirmation and updates.** One option is to set up a portal for clients who have been streamlined certified to submit address updates in the time between certification and card issuance.

- **Moving towards improving your streamlined certification systems longer-term:** Many states will be understandably focused on setting up “good enough” systems for streamlined certification in 2024; However, beginning to think about and budget for longer-term improvements is useful at the start.

- ▶ **Consider how you might link public assistance program participants at program entry.** Two options are to either directly integrate the case systems across programs or to have cross-program, “master” databases, like Minnesota’s [Shared Master Index](#). These allow for seamless deduplication of public assistance programs for Summer EBT through the use of unique identifiers, and offer the advantage of using queries against the master database without having to use individual program systems.
- ▶ **Develop statewide databases of categorically eligible children.** Statewide databases of school-aged foster children or homeless youth would allow for streamlined certification without school attendance.

Additional Resources:

For a more detailed breakdown of our recommended data aggregation, record linkage, and deduplicating processes for Summer EBT, check out these two resources:

- [Best Practices for Record Linkage in Summer EBT Delivery](#)
- [Best Practices for Data Aggregation in Summer EBT Delivery](#)

3. Create or plan for a statewide Summer EBT application

All participating states must have a statewide Summer EBT application process in place by summer 2025. A statewide application isn’t required for 2024; however, it may be helpful to implement one and it is encouraged by the USDA, where possible. Investing in an effective Summer EBT application system will be a higher priority for states who expect to have a large Summer EBT application pool.

Before diving into building a new Summer EBT application system, we suggest considering these three points:

- **Families should not have to specifically apply for Summer EBT benefits unless it is really, truly necessary.** Applications burden families and can be costly for the state. Applications will need to be matched against NSLP school enrollment data, which can be an error-prone and labor-intensive process. The more children issued benefits via streamlined certification, the fewer Summer EBT applications the state will have to process.



- **For those children who can't be streamlined certified, consider how to make the application process as easy as possible.** One option to reduce application burden is to source application information from families through collections that are not specific to Summer EBT. For example, in states where alternative income forms are already being collected, frequently filled out, and have the necessary information, these forms, which are also known as education benefit forms, household information reports, or household income surveys, can be used as application information for students in special provision schools. Because alternative income forms are tied to other program participation and funding sources, they tend to have a high level of buy-in from school officials, and parents are used to treating them as standard forms to fill out. The more applications that can be collected prior to the summer period through existing forms, the less confusion families will face about Summer EBT, particularly in special provision schools. An additional advantage is that because these forms must meet the minimum requirements of a Summer EBT application,¹⁵ there are opportunities for them to synergize with front- and back-end statewide Summer EBT application efforts.

¹⁵ In 2024, alternative income forms can be used without modification provided that they contain adequate information to determine that households meet the income requirements for FRP meals; in subsequent years they will need to meet the [minimum standards](#) of a Summer EBT application.

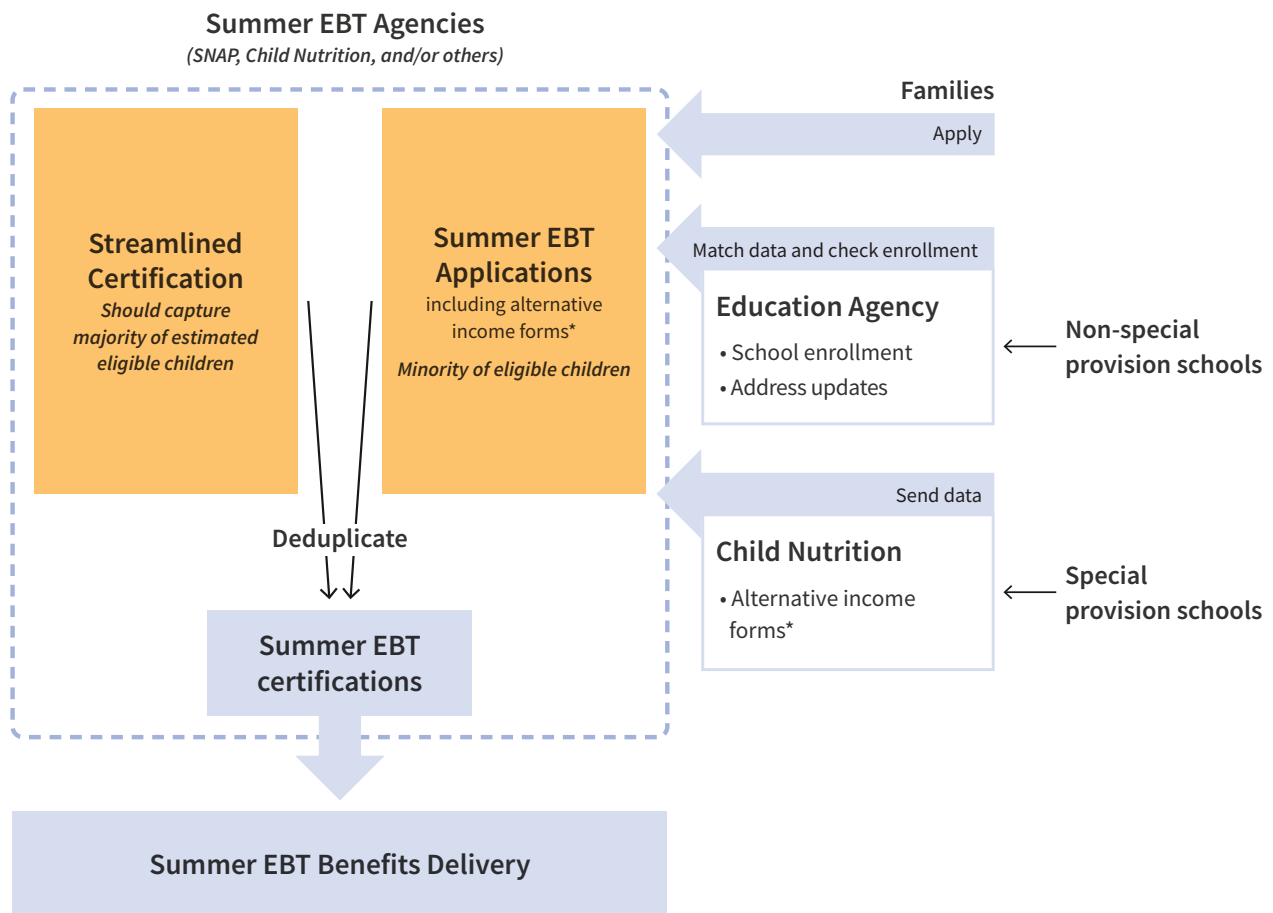
Questions to ask	Recommendations
<p>Does my state already participate in the Medicaid direct certification pilot?</p>	<p>Expand your streamlined certification by using Medicaid data to identify children who are income eligible for Summer EBT (household income under 185% of FPL). This will require clearing any legal interagency barriers and petitioning FNS for approval. The application for Medicaid DC pilots is currently open until January 24, 2024.</p> <p>In the long term, explore cross-enrollment opportunities to increase SNAP and/or Medicaid participation.</p>
<p>Does my state already use alternative income forms to collect income information at special provision schools?</p> <p>Do those forms include all the information we need to determine Summer EBT eligibility? If not, how can we modify the form to make it usable for Summer EBT?</p>	<p>Modify alternative income forms (if needed) and use them in special provision schools.</p> <p>Ensure student data from alternative income forms is compiled and shared with the relevant state agency.</p>
<p>Are there opportunities to obtain the information for Summer EBT applications?</p>	<p>Explore options to collect the information needed for the Summer EBT application through existing application processes. This simplifies the experience for families, and reduces the amount of paperwork that school staff need to process. For example, Michigan turned their school meals application into an NSLP and Summer EBT application, which helps families who might not have applied to school meals receive Summer EBT benefits.</p>

- If the above two strategies cannot capture the vast majority of eligible children, it will be an even higher priority for your state to create a Summer EBT-specific application process that is simple, smooth, and easy to understand for families—and easy to process for agency staff on the backend.** We present key considerations and our recommendations for how to approach that in the in-depth resource on [creating a human-centered Summer EBT application](#).

4. Check Summer EBT application eligibility and remove duplicates

In order to issue Summer EBT benefits to a child whose parent/guardian has submitted a Summer EBT application, it is necessary to check that the student is enrolled at an NSLP or SBP-participating school, that the information provided meets income requirements, and that the applicant has not already received benefits. Similarly, alternative income forms or routine data collections at NSLP or SBP participating schools that meet the requirements of Summer EBT applications will also need income confirmation and deduplication. Students may also indicate that they participate in programs used in direct certification. These case numbers need to be checked against program databases; successful matches may remove the need for checks on income or school enrollment for those students.

Figure 7: Overview of handoffs needed to check Summer EBT application eligibility and uniqueness



GOAL: Summer EBT applications are accurately matched against student enrollment data

Recommendations:

- **If partnering with local education authorities (LEAs), consider what handoff sequence will work best.** If LEAs will be processing Summer EBT applications in 2024, we recommend that LEAs check school enrollment or local program participation¹⁶ *before* sending applications to Summer EBT agencies. The Summer EBT agencies would then cross-reference case numbers against statewide databases and deduplicate new application submissions against existing Summer EBT certifications and other applications. This will reduce the amount of interagency communication required and agency work necessary. If a statewide application will be used in 2024 but LEAs will be needed to check school enrollment, then we recommend reversing the procedure and performing deduplication and local program enrollment checks on those applications first.
- **Include student and school identifiers in the application itself.** When matching data, an identifier is always easier to match than free-form text. If individual student IDs have been attached to the school enrollment data, then when an applicant to Summer EBT enters an ID in the application, they can be looked up using it.¹⁷ Using IDs in this way ensures a perfect match upon application submission, rather than relying on potentially tricky matching techniques after-the-fact. An alternative option is to send parents/guardians personalized links to forms with pre-populated content to ensure a match against school enrollment data. For example, if applications are matched against enrollment by first name, last name, etc., send students home with customized application invitations that lead to forms with those name elements pre-filled. This will dramatically increase the match rate. A real-world example of this in practice is personalized event e-vites, such as wedding invites.
- **Use address validation in the Summer EBT online application to reduce applicant errors in mailing address entry.** [Address validation](#) is a service provided by the USPS and some vendors to ensure that an address matches the USPS' delivery database and returns addresses supplied to it in a standardized form. That standardized form can be helpful when comparing address elements for matches or duplicates. It can be accessed via an [application programming interface](#) (API) that can be included in an online application, or repeatedly called to validate batches of addresses from collected data.

¹⁶ Programs which confer categorical eligibility for FRP meals - and consequently Summer EBT - for which statewide databases do not exist, e.g. homeless or runaway.

¹⁷ When the parent/guardian enters the ID number for the student in the application, we recommend confirming with the user some corresponding identifying information (e.g. "Is the first name of this student: CXXXXN?") so that the applicant can confirm that they entered the correct student ID.

- Use validated form elements for school names like drop-downs or autocompletion.**

If school IDs aren't an option or families aren't likely to know them, make sure that the school name is written in the exact same way in both the student enrollment dataset and the backend school names list that the drop-down menu or autocompletion field will draw from.¹⁸ This is especially important in states where enrollment must be matched by schools/LEAs in 2024, rather than at the state agency level, to ensure that applications can easily be routed to the right LEAs. In order to support parents/guardians' ability to submit one application that covers all children in their household, ensure that multiple schools can be selected in an application and linked to different children in the same family.
- Work with schools to pre-define a process for how applications that cannot be exactly matched will be reviewed and resolved.** Sometimes the use of free-form elements is unavoidable. In these cases, it's important to use flexible matching strategies (e.g., [fuzzy comparisons](#)) to catch mistakes. When filling out forms, it's common for parents/guardians to make mistakes, use nicknames or slight spelling variations, and otherwise enter data that is different from the data on record. Whatever data matching technique is used should account for common errors. Schools will know best their constituents and what kind of mistakes they might make. For example, in a district with heavy Chinese enrollment, Anglicized names may appear with or without hyphens or using different spellings because they are all imperfect representations of the Chinese characters that truly represent children's names. Knowing this may motivate using certain phonetic comparisons when performing matches.

GOAL: Duplicate Summer EBT applications are accurately identified and removed

In addition to setting up the deduplication processes for streamlined certification data, states will need to deduplicate Summer EBT applications from each other and from streamlined certifications. The requirements of deduplication for Summer EBT applications are significantly different from those of streamlined certification; because Summer EBT applications can have free-text elements, duplicates are much less likely to be similar to each other.

Summer EBT applications can be duplicates of other cases in a variety of ways. For example:

- Repeat Summer EBT applications, submitted in a short time period with minor variations.
- An application that supplies a SNAP case number, but the family recently moved and never got their card.
- An application without a SNAP case number that matches a SNAP-streamlined certification case because the family hasn't received their card yet and thought they might need to apply, were receiving SNAP benefits earlier in the year but no longer participate, or were simply confused about the program.

¹⁸ Consider adding a map element on the application form and help text to indicate that if a school isn't present on the map, it doesn't participate in NSLP. A map element can also be helpful for parents who only know their school by its colloquial name, so they can find the school and select the formal name from the list.

Recommendations:

- **Consider flexible approaches rather than a blanket rule.** What to do with duplicates depends heavily on context. If a family submits two applications within a short time period, it is likely that they intend for the second to overwrite information from the first. If a different application matches a case that had already been certified and the card was returned as undeliverable, it's an excellent opportunity to source a more reliable mailing address instead of procedurally denying the application. When processing Summer EBT applications, the deduplication and data matching approaches you use should be thoughtfully designed to capture as many eligible students as possible while limiting the likelihood of over-issuance.
- **Adapt your deduplication approach based on the data fields in the Summer EBT application.** For applications that are able to use unique identifier fields like student IDs or public assistance case numbers, then the school enrollment data supplied by the education or child nutrition agency can be used directly and the case can be deduplicated using the same approach used when deduplicating [streamlined certification](#) data. For applications that have to rely on free-text inputs to make matches against student enrollment, a subjective decision will have to be made as to whether the application data or the student enrollment data are more reliable to use for the deduplication procedure. (This is why we recommend minimizing free-text entry fields as much as possible in the Summer EBT application.)
- See Code for America's resource on [best practices for record linkage](#) for more technical depth and tips on data matching and deduplication.



Step 3: Conduct community outreach and set up client support

Quick Checklist:

- How will you reach out to potentially eligible students/families about Summer EBT?
- How will you prepare frontline staff and schools or school districts to handle queries from families?
- Where can parents/guardians go to get help or with questions about eligibility and applications? Where can they go for questions about benefit issues? How will that information be communicated?
- How will you ensure that parents/guardians have one clear, dedicated place to go for customer support with their case or application, and that entity has authority to solve customer issues and liaise with all relevant agencies and schools?

1. Develop an outreach plan to reach eligible households

Because there will be multiple pathways for different families to access Summer EBT benefits, effective community outreach is critical to ensure that families aren't confused about Summer EBT eligibility, key deadlines, whether they need to apply, and how. Clear communication about the program will also help reduce strain on program staff, particularly customer support staff at schools and agencies who will need to field questions from families. Investing in community outreach will also help agencies avoid costly time and resources required if a significant number of families apply for Summer EBT unnecessarily.

From the research Code for America conducted with clients during Pandemic EBT, here are some key questions clients will likely be asking about Summer EBT:

Figure 8: Common questions from clients that Summer EBT agencies can proactively prepare to answer

Learn about Summer EBT	Apply or get auto-enrolled	Use benefits	Get support
<p>Am I eligible?</p> <p>How can I get Summer EBT? Do I need to apply?</p> <p>Is Summer EBT information coming from a source I trust, and in a language I am comfortable using?</p>	<p>If I need to apply, <i>how</i> do I apply?</p> <p>Can I apply easily, and on my mobile device?</p> <p>What happens if I run into trouble?</p> <p>How can I opt-out of Summer EBT?</p>	<p>How and where can I use Summer EBT benefits? What is not allowed?</p> <p>How much in Summer EBT benefits do I have left?</p> <p>When do my benefits expire?</p>	<p>Where do I go if I need help?</p> <p>When should I contact my school versus a state agency office?</p> <p>If I didn't get benefits, but think I should have, what should I do?</p>

Building and maintaining trust with families as early as possible will be critical as you spread awareness about this new program. Here are some tips to consider as you develop your Summer EBT community outreach plan:

GOAL: Families receive essential information from trusted channels about new benefits, their potential eligibility, and any steps they need to take.

- **Ensure that communications about the new Summer EBT program are widely disseminated.** They should reach households with children in SBP/NSLP schools as well as children who are able to be directly certified for FRP meals but not enrolled in SBP/NSLP schools.
- **Develop multilingual outreach materials that meet the needs of your communities, and use [plain-language guidelines](#).** All communication about what Summer EBT is, who is eligible for it, and how families can access the benefit should be consistent, clear, and timely. For examples of clear communication materials, see Code for America's [Outreach Toolkit for Pandemic EBT](#) in California, developed in partnership with the California Department of Social Services.
- **Consider using multiple channels to reach families,** from traditional means of communications such as email and phone calls, as well as digital channels such as robocalling, SMS, radio, physical advertisements, and social media. Be mindful of the demographics in your state. If many eligible families face barriers accessing technology, it'll be helpful to also do outreach that includes flyering, newsletters, posters, and other in-person communication strategies. Text messaging can be particularly helpful in getting quick information to families and decreasing their likelihood of reaching out to higher touch communications support (like a hotline, call center, or other time-consuming interactions).

- **Leverage local partners whom families will trust** (counties, community feeding sites, family resource providers, etc) to do on-site outreach to families and share Summer EBT information through their existing communication channels with families likely to be eligible. Whenever possible, schools should share information about Summer EBT via the regular communication channels they use with parents/guardians.
- **Consider how you want to manage parent/guardian consent to receiving digital communication.** If at any previous point families have opted into digital means of communication (email or SMS) about other benefits programs (e.g., SNAP), make sure that that consent can also apply to Summer EBT within your state’s regulatory context. Personal contact data for consenting recipients should be managed by the one designated Summer EBT agency.

GOAL: Families receive consistent information about Summer EBT between state agencies and from their school.

- **Communicate Summer EBT program details to school staff, community partners, and other service providers as early as possible** (and *before* doing mass community outreach). This ensures that schools and community partners can more effectively answer clients’ questions after mass outreach begins. Annual trainings for school staff (from receptionists to nutrition staff) can also help ensure everyone is aligned with basic program information and where to refer incoming questions from families. See the next section for further customer service tips.
- **Align internally on your messaging before you do mass outreach.** Make sure that information and talking points about Summer EBT are reviewed and agreed upon by all collaborating agencies and schools in order to avoid confusing parents/guardians with different messages.

GOAL: Families at special provision schools know that they will need to apply for Summer EBT only if their children were never enrolled in an assistance program, did not have Other Source Categorically Eligible status, and did not fill out an alternative income form indicating income-eligibility.

- **Provide special provision schools with customizable communications materials** that use plain-language, multilingual content about the program and who exactly needs to apply.

- **Use existing messaging channels for families enrolled in SNAP, Medicaid, TANF, and FDPIR** to alert them about the new program and explain that they don't need to apply.
- **Use aggregated school enrollment data (optional for 2024) to identify and target** communications to just those families who were not deemed eligible through streamlined certification or form collections.

The above tips are based on strategies that we have seen work in different state contexts; However, each state is different. Above all, we recommend that you measure what's working, and adjust outreach strategies based on data. Many state agencies do community outreach, but don't actually track whether the outreach is effective in reaching households, and which households they might be missing. For digital outreach, track impressions or click through rates; for analog media, try to assess if there are increases in searches or website hits shortly after deployment.

Additional Resources from Code for America and No Kid Hungry:

- [Digital outreach best practices](#)
- [Leveraging text messaging to improve communications with clients](#)
- [Measure what matters: metrics for human-centered outreach and delivery](#)
- [California Pandemic EBT outreach toolkit](#) (developed in partnership with California Department of Social Services)
- [No Kid Hungry Pandemic EBT outreach toolkit](#)

2. Set up customer support processes

States' experience with Pandemic EBT proved that effective customer support systems were critical to helping families navigate the program, and the same will be true for Summer EBT. Below are some general client support best practices that can assist with Summer EBT preparations and, if done well, reduce the volume and burden of client inquiries on program staff.

GOAL: Clients are not bounced around between schools and multiple agencies. Clients have one place to go for customer support with their case or application, and that entity has authority to solve customer issues and liaise with all relevant agencies and schools.

- **Consolidate inquiries about Summer EBT to one unique place** (one agency, one phone hotline, one email address, etc) to prevent confusion for clients and chaos for staff and schools. Ideally, this is a phone number or contact specific to Summer EBT and separate from other programs (e.g. SNAP specific, general agency number, etc). In most states, the SNAP-administering agency will likely have the existing infrastructure and processes for this.

- **Let clients know where to go.** Even if it is not possible to have one agency handle both applications and inquiries, have one centralized place where clients know they can go with questions, and then will be routed from there. That might be a hotline or even a basic question form on the FAQ website that captures all questions in one centralized place and then is routed to the correct agency/staff. Make sure that all schools and collaborating agencies are clear on where clients should go if they need support, in order to avoid ping-ponging clients between agencies and schools. For hotline support, consider providing schools with a depiction of the customer support phone tree so that they can better help families get to the right place to resolve their issue.
- **Empower customer support resolution.** Make sure that the customer support entity has the authority to resolve case issues in a “one touch” fashion for clients. A central hotline won’t work if that entity doesn’t have the authority to resolve customer problems and/or streamlined communication channels to work across relevant agencies.
- **Clarify ownership of customer service responsibilities among all agencies and schools.** Make sure customer service responsibilities at the state agency level are clear to avoid role confusion and circular routing of families from schools to the state agency call center and then back down to schools. It will be helpful to train school staff about the basics of Summer EBT and the common questions parents/guardians will have, but it’s important to not actually make them be responsible for customer service.

GOAL: Clients can easily find answers to common questions about Summer EBT in simple vocabulary and in their preferred language, without waiting on hold and taking up unnecessary staff time.

- **Have a dedicated single website where information about Summer EBT lives.** Make sure to include a frequently asked questions (FAQs) page that answers common questions in simple, accessible wording and in multiple languages. Here’s an [example of a clear, accessible FAQs page about Pandemic EBT](#) from the Kansas Department for Children and Families that helped the state reduce inquiries to their support lines.
- **Get ahead of the inquiries.** Proactively share answers to commonly asked questions on social media and other platforms where eligible clients are likely to see the information. To prevent staff burnout, try to answer as many questions as possible about the program in the FAQ website so families feel less compelled to call a hotline or another agency contact for additional questions
- **Update your self-service tools.** If your state already uses a chatbot tool for answering client questions about benefits, consider making sure that Summer EBT is included in the chatbot response architecture. The same would apply to any existing Interactive Voice Response (IVR) systems.

GOAL: Clients are properly redirected from schools to appropriate points of contact.

- **Outline clear expectations with schools.** Even with all the thoughtful communications planning for Summer EBT program dissemination, there's a good chance families will still contact schools first, as they are families' most comfortable point of contact and where they'll likely turn to for ease of support. With this in mind, have a clear plan for the type of role schools will play in communicating updates about the Summer EBT program.
- **Equip school staff to redirect parents/guardians.** Make sure schools have all the information they'll need to answer families' questions as early as possible, from basic program answers to where to direct families for additional support. Equipping school staff with the information needed to redirect Summer EBT inquiries to appropriate channels will ensure families' questions and potential participation are not lost in the process and that school staff don't experience frustration and burnout.

Additional Resources from Code for America:

- [Case study: Designing a chatbot for SNAP client support in California](#)
- [Measure what matters: metrics for human-centered outreach and delivery](#)
- [Texting Playbook: Basics of texting safety net clients](#) – Best practices for effectively SMS texting for client outreach and support

GOAL: The client experience improves over time and providing support becomes less burdensome for program staff.

- **If schools or an agency is getting overloaded with client inquiries, track patterns.** Is there one key issue that clients are complaining about or confused about? Look for upstream issues where the confusion is coming from and see how program operations and/or communications can be changed to improve client experience and reduce client support needs (for example, periodically updating the website FAQ page to reflect key questions not previously considered). Measure whether support channels are effectively resolving customer support needs, and adjust your approach accordingly.
- **Remember that people will creatively seek help if they need it.** Expect emails sent to unrelated or personal emails, or social media accounts. Try googling “[YOUR STATE] Summer EBT”, and see what search results you get—it will help you predict where people might end up while they're searching for help.

Step 4: Deliver benefits

Quick Checklist:

- How can families opt out if they do not want to receive Summer EBT benefits?
- How will families be able to gain information about application status, certification, and/or benefit issuance? How will families get information about how and where they can use Summer EBT benefits, as well as how long they will have to use them?
- How will clients be notified of selection for verification for cause? How will they be able to submit verification documents?
- How will you ensure benefits are delivered to as many clients as possible before the summer period and/or within a **reasonable time** after they are certified, consistent with relevant federal rules?
- Will any modifications or new developments to your case management system be necessary to administer Summer EBT?
- What modifications to your EBT system will be necessary to administer Summer EBT?
- What metrics will you track to ensure the success of Summer EBT? How will you design systems to facilitate their reporting?

1. Implement opt-out procedure

It is a **statutory requirement** that all states must give clients a way to opt-out of Summer EBT. This is particularly relevant for households who were automatically enrolled.

GOAL: Set up the opt-out procedure to be easy, clear, and human-centered.

- **Create an easy process for people to opt-out of receiving Summer EBT.** This might be a client-facing online form (ideally with a **mobile-first design**) linked to the case management system, a two-way SMS tool, or an interactive voice response (IVR) number that clients can call. Explore ways to use an automated, self-service tool for opt-out in order to reduce burden on program staff. Include the opt-out procedure in benefits enrollment communications (paper, email, phone, etc).

- **Ensure that users understand the consequences of opting out.** Use plain language to explain what it means to opt-out of benefits and to proactively address any misconceptions that might compel households to opt-out, if left unaddressed. For example, some households may be concerned that participating in Summer EBT would classify them as likely to become a public charge or draw attention to their immigration status. Make sure to clearly communicate (in multiple languages) at the point of opt-out (e.g., on the opt-out webpage) that a parent/guardian can receive the Summer EBT benefit for their eligible child even if they aren't a citizen and that Summer EBT will not affect their immigration status or immigration application or make them a public charge.
- **Confirm the opt-out choice with users before and after submission.** For example, including a single confirmation element on an online opt-out form (e.g., "Are you sure?" checkbox) can ensure that people don't opt-out by mistake. In addition, send a confirmation message when a household opts out, with clear information about how to opt back in if they opted-out in error, or if they change their minds.
- **Create a clear pathway for households to opt back in to the program,** in case they opt-out in error or their economic circumstances change during the summer certification period.
- **Track your opt-out rate.** It should be small, and if it ever jumps up significantly there may be a system error.

2. Set up or modify benefits delivery system

From a client's perspective, the most important step in the Summer EBT journey is actually receiving and using their benefits. Setting up your benefits delivery approach in a human-centered way will ensure that clients can use the benefits they are eligible for and also reduce administrative costs.

A key decision states will make is whether to issue new EBT cards to all Summer EBT recipients or to issue Summer EBT benefits via existing SNAP cards for those who have them and new cards to non-SNAP households. In 2024, our research with states indicates that many states will likely issue benefits via SNAP cards for existing SNAP recipients because of cost and administrative efficiencies. However, there may be reasons that states choose to issue new cards to all Summer EBT recipients, such as ease of separate benefits management. In either case, here are our recommendations for what client outcomes to aim for and tips to get there.

GOAL: Children receive Summer EBT benefits during the four month summer period within a reasonable timeframe after applying or qualifying through streamlined certification.

- **Set realistic deadlines around when data can be acquired from schools in order to enable timely issuance.** According to FNS, for children who can be streamline certified or who have an approved Summer EBT application on file prior to the start of the summer operational period, benefits must be issued and available to use at least seven calendar days and not more than 14 calendar days before the start of the summer operational period. For eligible children who apply too late for their benefits to be issued on the planned issuance schedule (e.g., children who apply after the summer operational period begins), benefits must be issued and available to spend not later than 15 operational days after a complete application is received by the Summer EBT agency. Issuance may occur after the end of the summer operational period for applications that are submitted at the end of the summer. If waiting until the end-of-year school data collection is complete would significantly delay summer benefits issuance, we recommend starting with an enrollment list from earlier in the year and then building in processes to handle students who joined after that date. Longer-term, investigate ways to increase the frequency of school data collections and budget for the resources that will be needed to process them in a more timely fashion.
- **Plan for early, proactive outreach to families** in partnership with schools to minimize the number of unnecessary Summer EBT applications submitted, which will help avoid a backlog in application processing before the start of the summer period. For families whose children qualify via streamlined certification, notify them of their eligibility status ideally before doing widespread promotion of the Summer EBT application.
- **Leverage automatic processing.** Invest in application systems that can handle as much of the determination process automatically as allowed by regulation (in order to reduce staff burden), and then plan for adequate staffing for remaining application processing tasks that cannot be automated.



GOAL: Children receive their EBT card where they live during the summer.

- **Ensure that people can update their address in ways that are accessible, trustworthy, effective, and secure.** Within your current benefits management system, consider how you might make it easier for parents/guardians to update their mailing address info at any point during the year. If your system cannot currently accommodate user-generated address updates at any time, one option that some states have taken is to create set windows at the beginning and end of the school year for parents/guardians to submit updates.
- **Create accommodations for split-custody families.** Ideally, the primary caregiver of the eligible child during summer months receives the Summer EBT benefits. Provide a clear and simple way for families to update their case or notify the responsible Summer EBT agency about different custody arrangements during the summer months (with appropriate documentation).
- **Sync addresses across databases.** In addition, it is important to ensure that address updates sync across all connected databases (SNAP, Medicaid, Summer EBT, etc).

GOAL: Parents/guardians know when they receive their Summer EBT benefits and how to use them.

- **Notify SNAP recipients who receive Summer EBT on their existing cards via multiple contact channels** (email, paper, SMS) of the following: 1) that additional benefits have been added, 2) what the benefits are for, 3) how they can be used and how they may not be used, 4) when they must be used based on the statutory [expungement rules](#), and 5) how those benefits interact with their existing balances.
- **Send notifications of Summer EBT benefits to SNAP households as close as possible to the date that the benefits hit their EBT cards.** This will reduce parents/guardians' confusion about benefit delivery and usage window. Use [plain-language guidelines](#) to craft short, clear communications with clients about the additional benefits that have been added.
- **Set up EBT systems to use Summer EBT benefits first** when they are included on the same card as SNAP benefits, as Summer EBT has a shorter expungement window (four months) than SNAP benefits. Note that this is a requirement for all states, per FNS' "[Summer EBT webinar Q&A](#)" document from November 2023.
- **Consider making the Summer EBT-specific EBT cards look visibly different from the SNAP cards in your state.** Qualitative research with clients indicates that non-SNAP households may feel uncomfortable and/or confused about receiving a card that looks like SNAP if they haven't applied or aren't eligible for SNAP.

GOAL: Parents/guardians with multiple children on Summer EBT can use one consolidated card with benefits for all eligible children.

- **For Summer EBT recipients who receive a new card, consider loading all the benefits for the eligible children into that household onto one card, rather than issuing one card per child.** This will create a more streamlined experience for parents/guardians who are using the benefits on behalf of their children. If Summer EBT cards are issued in the child's name, attempt to consolidate based on the oldest student known or offer options for parents/guardians to consolidate cards. A consolidation option made available to parents/guardians prior to issuing cards will save the state money on cards and reduce family confusion. In order to identify families from FRP certifications or NSLP student enrollment, aggregate family IDs at the coordinating Summer EBT agency if they exist; if not, use [record linkage techniques](#) on the parent/guardian field and mailing address to connect records.

GOAL: It is clear and easy for families to troubleshoot issues with EBT card activation, damage, or loss.

- **Work with EBT vendors to align on their process for activating cards and handling lost or damaged cards.** Make sure that the vendor and responsible Summer EBT agency make that information clear to families to avoid sending conflicting messages and causing confusion.
- **Provide clear guidance to parents/guardians about what to do.** One state provided this language to clients on their FAQ webpage for Pandemic EBT as a way to provide clear and detailed instructions for how clients could troubleshoot the activation of their new cards: *“To activate your Pandemic EBT card, call the EBT Customer Service Center at (877) 328-9677. Option 4 will allow you to set a PIN for your new card. You’ll need the following information to activate your card: the 16-digit card number found on the front of your card, your ZIP Code for your mailing address, and the 6-digit date of birth for the child named on the card.”*

3. Create a Summer EBT case management system

GOAL: Summer EBT families have their case information stored accurately and securely; Caseworkers are able to access, update, and explore case data in an easy and intuitive way.

- **Each state will need to decide what approach will work best for them in creating a case management system specifically for Summer EBT.** The highest-level decision will be whether to build a new case management system specifically for Summer EBT, or to adapt an existing case management system (e.g., SNAP). See the table below for an overview of the possible pros and cons of both options.

Build upon your existing SNAP case management platform	Create a new case management system specifically for Summer EBT
<p>Potential advantages</p> <p>For most states, the majority of Summer EBT clients will be identified through streamlined certification of SNAP lists (and Medicaid, where applicable). Given this, keeping case management data in one shared system can be helpful.</p>	<p>Case management functions can be tailored to the specifics of the Summer EBT program, e.g. benefits being issued in the name of the child.</p>
<p>Potential disadvantages</p> <p>If Summer EBT is included within the existing SNAP system, the components may be subject to a higher ongoing cost, as the cost allocation formula for development or maintenance and operation may be inclusive of all programs within the system, not just Summer EBT.</p> <p>Every automatic function that is specific to SNAP cases (e.g. renewal notifications) would likely need to be modified for Summer EBT-only cases.</p> <p>Modifying the functionality of the existing code base may be quite tricky, requiring individuals with substantial knowledge and further increasing vendor lock-in or dependence on legacy systems.</p> <p>If Summer EBT benefits are issued in the name of the child rather than the parent/guardian, it may require significant overhauling of what defines a SNAP case in the system.</p>	<p>The procurement and development timelines may mean that the new system is not fully functional by Summer 2024.</p> <p>Database queries against both populations are more difficult to write as there are two independent data sources that will need to be merged.</p> <p>Tests of changes to the case management systems can't be simpler "unit" tests of single functions and instead need to be more complicated "integration" tests that assess interconnected systems. Integration tests are more complicated to write and maintain.</p>

GOAL: Summer EBT vendor procurement and contracts prioritize human-centered outcomes and continual improvement.

- Pay for actual program outcomes, not requirements or technology outputs.** For example, instead of procuring technology that meets a list of requirements such as “System must be able to allow applicants to fill in their first name and last name,” procure technology that meets your program goals, such as “Ensure that 99% of parents/guardians applying for Summer EBT for their children can complete the application within 5 minutes and receive their cards within 7 business days.” By focusing vendors on actual desired outcomes, you can avoid the costly game of telephone that can follow as small, highly specific requirements accumulate.

- **Engage vendors to build towards a user-centered experience for families and caseworkers.** Whether you decide to build a new system or adapt an existing one, here are some key functions of a Summer EBT case management system that we recommend aiming for when engaging potential or existing vendors:
 - ▶ Easily links Summer EBT, SNAP, and (where relevant) Medicaid cases
 - ▶ Allows you to easily examine the SNAP or Medicaid participation rates for the people who receive and don't receive Summer EBT to explore cross program enrollment opportunities.¹⁹ Specifically, it should allow you to: 1) Determine which Summer EBT-specific cases receive additional benefits shortly after the end of the summer period, and 2) Identify cases with children in special provision schools who qualified by specifically submitting Summer EBT applications
 - ▶ Links optional demographic information from SNAP or Medicaid cases to Summer EBT records, to enable easier analysis of Summer EBT program access
 - ▶ Stores all mailing addresses associated with a case, shifts to lower priority addresses if necessary, and allows for mailing address updates to be supplied by families via a customer-facing portal
 - ▶ Tracks the provenance of all data associated with cases, including any local identifiers, data sources, date of transmission, and who to contact in case of questions
 - ▶ Relays FRP eligibility information to schools for children who qualify for Summer EBT by application on or after July 1st, as those students could theoretically receive a school-year FRP certification without submitting an additional application
 - ▶ Tracks opt-out status
 - ▶ Stores problems with Summer EBT cases, such as undeliverable cards and parents/guardians who can't be contacted

- **Structure contracts so that vendors are not paid by the work hour—but by the business outcome.** Traditional IT vendor contracts are usually done by Time & Expense, paid by the work hour. If possible, a more effective approach is to focus contract language on the business or client outcomes you want to achieve. For example, a “pay for performance” model.

- **Avoid vendor lock-in.** This may look like purchasing technology that is not vendor-specific (e.g. [open source](#) technology) and asking your vendors for modularity. This means building the technology in different distinct parts that can be taken out, swapped, and used interoperably.

If you will be engaging in a vendor procurement process for a Summer EBT case management system, check out Code for America's [tips for working with vendors](#).

¹⁹ Increasing your ability to identify cross-enrollment opportunities will reduce future Summer EBT application burden on state program staff because it will move students/households from the application pool to the streamlined certification pool.

4. Implement verification for cause

Verification processes are very different for SNAP than they are for School Meals Programs: while SNAP routinely verifies many components of every application, in [school meals](#) a sample of applications are verified, along with applications for which there is cause for additional verification. In 2024, only verification for cause will be required and applies only to Summer EBT applications or alternative income forms, not streamlined certifications. In addition, in 2024 it is permitted to have LEAs conduct verification for cause similar to how they may collect and process Summer EBT applications.

GOAL: The verification process for Summer EBT ensures program integrity while being as easy and stress-free as possible for families.

- **Coordinating agencies should avoid imposing additional verification burdens beyond what the rules require** (once full verification regulations are set forth), in order to preserve access to the program as well as minimize administrative burden while maintaining program integrity.
- **Use digital outreach to contact families who need to submit verification documents**, as paper notices often go unanswered. Many families applying for Summer EBT may be unfamiliar with public benefit verification processes in general, in particular those whose children attend special provision schools.
- **Consider providing families multiple ways of submitting documents.** If the state creates a document upload portal, allowing clients to submit documents without logging in is a best practice for increasing the frequency of document submission. Mobile friendly applications that let people use their phone's camera to submit photos of verification documents is an effective strategy for lowering barriers to access.

5. Set up fair hearings and appeals processes for clients

According to the FNS webinar FAQ held on November 20th, 2023, fair hearings and appeals for Summer EBT will largely follow the [procedures](#) for the NSLP and SBP. Full details of the appeals process are likely to be specified in the Interim Final Rule, to be issued no later than December 29th, 2023. Although it has not been explicitly stated, in 2024 LEAs are likely to be able to conduct fair hearings and appeals if they are the agencies who are conducting verification for cause.

Summary:

Setting your state up for success
with Summer EBT in 2024
versus 2025 and beyond

Summary

Setting your state up for success with Summer EBT in 2024 versus 2025 and beyond

Desired program outcome	Short-term approaches for 2024	Solutions for 2025 and beyond
<p>Automatic enrollment of eligible children through streamlined certification is executed with as few complications or errors as possible.</p>	<ul style="list-style-type: none"> • Light touch aggregation techniques for FRP lists like templated enrollment spreadsheets uploaded via a cloud file storage service (ideally one that is FedRAMP compliant). • Provide as much clear documentation and assistance, like sample cleaning code, to data officers. • Use simple tabular data formats, like Excel or comma separated value (csv) files. • Use exact comparisons for deduplication of program data; consider fuzzy methods for deduplication of FRP certifications only if substantial variations are observed. 	<ul style="list-style-type: none"> • Improve FRP list aggregation by implementing upload portals with real-time validation connected to statewide databases, or encourage adoption of statewide student information systems. • Invest more resources into the deduplication algorithm, as it can reduce the frequency of issuing erroneous benefits. • Create a shared system for SNAP and Medicaid, which enables deduplication as individuals enter them, and provides ancillary opportunities like cross-enrollment outreach or aligned renewals.
<p>As few people have to specifically submit Summer EBT applications as possible (e.g., most children are automatically issued benefits via streamlined certification or apply through routine means such as alternative income forms in special provisions schools).</p>	<ul style="list-style-type: none"> • Prioritize getting the systems and processes right for streamlined certification, in order to minimize the number of Summer EBT applications your state will need to process. • If not currently planning to do so and it is a viable option for your state, consider using alternative income forms for 2024 as Summer EBT applications in special provision schools. 	<ul style="list-style-type: none"> • Opt-in to Medicaid for streamlined certification or petition for FNS approval to do so. • Reduce the SNAP and Medicaid participation gaps through application improvements and targeted outreach. • Synergize the statewide Summer EBT application with alternative income forms and FRP meals applications, such as using the same design, form elements, and code base (for an online application). • Include Summer EBT applications in an integrated benefits application.

Desired program outcome	Short-term approaches for 2024	Solutions for 2025 and beyond
<p>Parents/guardians that have to apply for Summer EBT can do so easily and in their own language.</p>	<ul style="list-style-type: none"> • A statewide application isn't necessary for 2024, however states are encouraged by FNS to create one. • If you expect to have a relatively small number of Summer EBT applications, the simplest approach for 2024 is a PDF form that people can mail or send via encrypted email to a secure address. Make sure to have the form available in multiple languages. Adapt the standard USDA FRP application or a simple fillable PDF. When adapting, add data validation to the form fields to increase the likelihood of collecting easily processed data. • If you expect a large number of Summer EBT applications, try to modify your Pandemic EBT application system to serve for Summer EBT. • The parts that require the most thought (and where clients tend to have difficulty filling out) are their income and the necessary information to match against school enrollment; If you have limited time and resources, make sure to invest in getting those elements right in 2024. 	<ul style="list-style-type: none"> • Statewide Summer EBT application is available online and on paper in multiple languages and uses plain language. The online version should be mobile-friendly and employ user experience (UX) best practices. • Build automated notifications to clients to inform them of the status of their application as it moves along, and any action they need to take.
<p>Parents/guardians that have to apply for Summer EBT have their school enrollment data matched with low error rates.</p>	<ul style="list-style-type: none"> • Manual confirmation of enrollment at NSLP-participating schools for applications can be a short-term fix. Use exact matching techniques to attempt to confirm school enrollment via unique IDs, where possible. If that fails, perform a search for students who have similar names, ages, and schools. • If confirming NSLP school enrollment for applications will be performed by LEAs in 2024, ensure that form elements validate school or district inputs, i.e. there is no free-form text option or it requires explicitly choosing an "other" option. • Use fuzzer linkage algorithms for data matching. (See best practices document) 	<ul style="list-style-type: none"> • If student and school IDs cannot be added form elements, work with schools to create pre-populated application invitations with the elements needed to ensure exact matches. • Improve the form design of the Summer EBT application to include best practices such as address validation and school name validation. See tips and best practices. • Aggregate school enrollment at a Summer EBT agency in an advanced system, similar to FRP lists. Create a statewide database of school enrollment by 2025, as required by FNS.

Desired program outcome	Short-term approaches for 2024	Solutions for 2025 and beyond
<p>Parents/guardians can easily and quickly have their questions about Summer EBT resolved.</p> <p>Summer EBT program staff and schools are not unnecessarily burdened by a flood of customer support inquiries.</p>	<ul style="list-style-type: none"> • Establish a clear, dedicated customer support process between agencies and schools to resolve client issues and questions. • Have one centralized place where clients know they can go with questions. That could be a hotline, a central email address (“SummerEBT@state.gov”), or a basic question form on the FAQ website that captures all questions in one centralized place and then is routed to the correct agency/staff. • Have a dedicated single website where information about Summer EBT lives. Make sure to include a frequently asked questions (FAQs) page that answers common questions in simple, accessible wording and in multiple languages. • Communicate Summer EBT details as early as possible to schools so that they can be prepared for parents/guardians’ questions. See this section for more tips. 	<ul style="list-style-type: none"> • Invest in self-service support options such as a chatbot and livechat tools to quickly answer client issues and reduce burden on staff. See tips and best practices. • Use data to improve customer support over time and build a culture of client-centered, iterative improvement in order to proactively address client issues. See our tips on what to measure.
<p>Families know that Summer EBT exists, whether they are eligible, and whether or not they need to apply.</p>	<ul style="list-style-type: none"> • Utilize plain language best practices for all outreach materials. • Conduct multilingual outreach in partnership with schools and community-based organizations to inform parents/guardians about whether they need to apply or not. This can help avoid unnecessary application submissions. • Notify program participants who can be streamlined certified (e.g., SNAP, Medicaid, FRP school meals) or those who were approved through other forms of their Summer EBT status, that they don’t need to apply, and how to opt-out if they wish. 	<ul style="list-style-type: none"> • Invest in using diverse channels for outreach (digital and non-digital). See our tips on how to do this. • Use data to track what outreach marketing channels are effective over time and refine your approach.

Desired program outcome	Short-term approaches for 2024	Solutions for 2025 and beyond
<p>Families receive their Summer EBT benefits in a timely manner during the summer period (i.e., they receive Summer EBT cards at their current mailing address after applying, or receive a clear notification when Summer EBT benefits are added to their existing SNAP cards).</p>	<ul style="list-style-type: none"> • Deliver Summer EBT on SNAP cards for SNAP clients, and notify recipients of the additional benefits and when they must use them by. • Work with schools to create a way for parents/guardians to update their mailing addresses in the spring and then route that data to the responsible Summer EBT agency. • Provide parents/guardians a way to opt-out of Summer EBT if they desire (email, phone number, or simple web form). 	<ul style="list-style-type: none"> • Develop or modify a benefits portal that allows clients front-end access to perform key functions for their Summer EBT account such as checking their balance and updating their mailing address at any time of year. Make sure that the address updates are set up to automatically sync across all associated data systems.

Quick reference guide:

Anticipated Summer EBT challenges
and recommended solutions

Customer support channels are overwhelmed by client inquiries

- If schools or an agency are getting overloaded with client inquiries, track patterns. Is there one key issue that clients are complaining about or confused about? Look for upstream issues where the confusion is coming from and see how program operations and/or communications can be changed to improve client experience and reduce client support needs.
- See the playbook sections on [conducting outreach](#) and setting up [customer support processes](#) for tips on how to avoid or mitigate a high client inquiry volume.

Confusion for families and staff in special provision schools about Summer EBT applications

- Conduct targeted multilingual outreach in partnership with special provision schools to inform parents/guardians about whether they need to apply or not. Use existing messaging channels for SNAP-enrolled families to alert them about the new program and that they do not need to apply for it.
- If all or many special provision schools already use alternative income forms and they meet the USDA requirements, use those for Summer EBT in 2024. This will reduce confusion and burden for families and school staff.
- For 2024, conduct short training sessions to equip special provision school staff to handle basic data management, data cleaning, and data entry tasks in order to obtain the data you'll need from the alternative income forms or Summer EBT applications.
- Use Summer EBT outreach as an opportunity to also reduce the SNAP and Medicaid participation gaps in special provision schools. If households are enrolled in SNAP, Medicaid, or other means-tested programs, they do not need to submit a separate Summer EBT application in future years, which reduces burden for them and for school and agency staff.

Summer EBT outreach materials aren't reaching eligible families

- For those who do apply, collect data on where they heard about the program so you can track which outreach channels are working well. This can be as simple as including a question in the application about where they heard about the Summer EBT program. Be sure to also review program participation data to see which demographic groups are over or under-represented, so that you can target your outreach towards underserved populations. You might also consider gathering input from schools and any community-based organizations—such as food pantries or feeding sites—about why they think Summer EBT information isn't reaching families, and what ideas they have about how to improve outreach.
- See the playbook section on [conducting outreach](#) to families for tips and best practices on digital and non-digital outreach.

Outdated student mailing addresses and contact information

- Up-to-date mailing addresses were a common problem from Pandemic EBT and will likely remain so for Summer EBT. The Summer EBT program lets children qualify at any time during the school year before summer. So, a straightforward approach, like using the address from their SNAP enrollment, might not work every time.
- We recommend using the most recently supplied address available for a child across all sources. In the case of addresses updated in the same month, prioritize those from public assistance and categorical eligibility programs first.
- Addresses associated with school data are often of poor quality because parents/guardians are not incentivized to keep them accurate. Giving them that incentive through early communication and providing easy ways to supply mailing addresses that meet program requirements will help ensure that cards are delivered correctly.
- Some states have set up a portal for clients who have been streamlined certified to submit address updates in the time between certification and card issuance. They are then notified through digital channels of the site.

Acquiring data from many different providers

- See the section on [Determining Who is Eligible for Summer EBT](#) for detailed discussion of school data aggregation options, data handoff between agencies, data matching, and deduplication.

Managing school data in a decentralized system

- If you are in a state that has legal or infrastructural restrictions on centralizing student data, in 2024 we suggest you aggregate data however necessary for your state's needs, given practical limitations.
- If you can use cloud services without significant regulatory hurdles, a simple solution that is FedRAMP compliant is to upload Excel or comma separated value (csv) files of school enrollment or free or reduced price (FRP) certifications to a secure file sharing service like Box.
- Communication in the short-term is key. Let local data officers know of any requirements for their data submissions, including file formats, schema, and validation. Establish a way for them to get in touch with a central authority and possibly each other, such as setting up a listserv. The earlier they are made aware of any program requirements, the more time they will have to find new data sources. For example, if post office boxes will not be allowed as a valid delivery address for Summer EBT applicants, school officials in rural areas may need time to directly contact students to obtain updated mailing address information.

- If FRP certifications cannot be aggregated, there may be no immediate solution as many of them are required for streamlined certification. However, there are some techniques that allow LEA's to check NSLP school enrollment while preserving student privacy, such as private set intersection. See [here](#) for a high-level overview of that technique and [here](#) for a more technical perspective.
- See the section on [collecting data from schools](#) for recommendations on what to aim for in your long-term planning for 2025+.

Remember that especially in a decentralized context, the strength of your relationships with schools is a key resilience factor. When technology systems fail, those relationships are how you will get through the crisis and still deliver for families. Here are some questions to consider:

- How would you handle a catastrophic failure in your school data aggregation system? For example, suppose a server misconfiguration allowed all of one school district's data to be overwritten by another's. Do you have working relationships in place to rapidly recover the missing data?
- How long would it take to get ahold of someone with authority at a randomly selected school if data were submitted incorrectly or a specific child's information needed to be double checked, say in a split-custody case?

If you don't have clear answers to these questions, you may need to invest in building stronger working relationships with schools and districts. See tips on that in [this section](#).

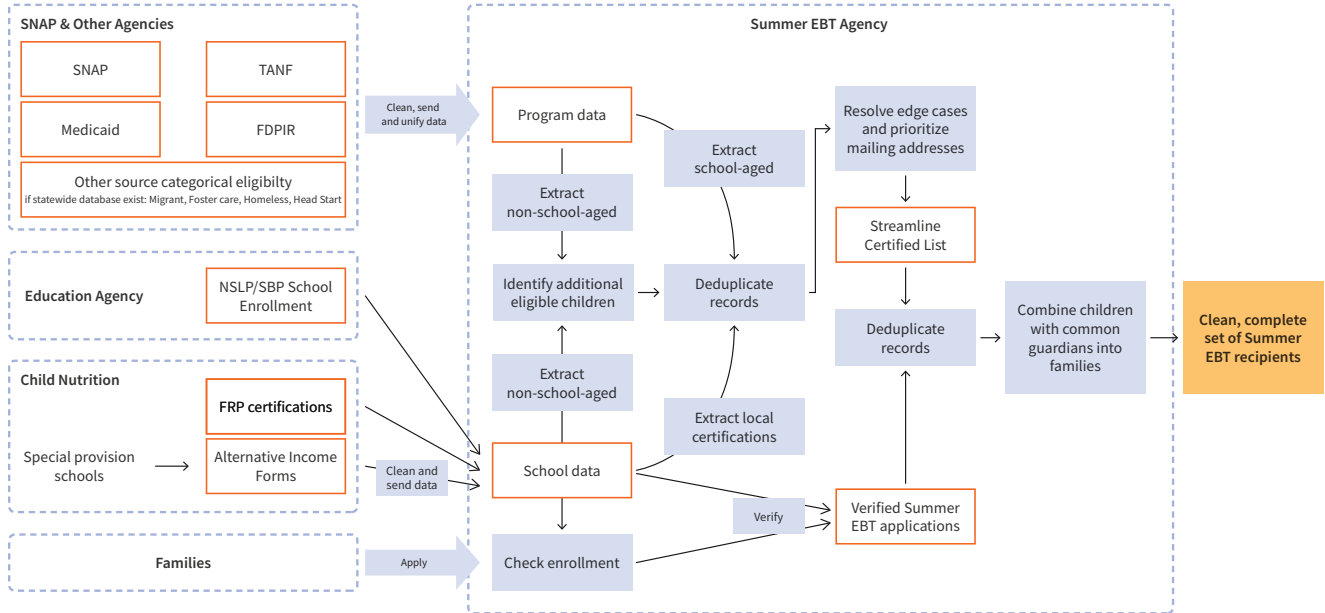
Workarounds for states with restrictions on sharing student data

Streamlined certification requires that students who have been certified for FRP meals receive Summer EBT without further application. If restrictions in state law prevent you from centralizing school data, it is first important to distinguish if that applies to both FRP lists and enrollment in an NSLP operating school. FNS hasn't confirmed whether or not a state is allowed to ask families for permission to aggregate their data before issuing benefits. However, it is possible that it will not be allowed, given that the goal is to deliver benefits automatically.

Assuming that FRP lists can be aggregated and contain complete information—but school enrollment can't be aggregated, states have a couple of options:

- For 2024, states are allowed to process Summer EBT applications at LEAs in a decentralized fashion. If no statewide application is used, the logistical challenge becomes one of aggregating completed applications. This is similar to [aggregating other kinds of school data](#), although it would need to be done more frequently and on smaller sets of data.
- Another option is to use a statewide application form and then route applications to the relevant LEAs for processing.

Figure 9: Overview of recommended deduplication process across all Summer EBT data sources



- FRP certifications may have different data quality standards than assistance program data, requiring different deduplication algorithms. If possible, include other sources of directly linkable data that might include variations.
- Use fuzzer linkage algorithms. See Code for America’s [Best Practices for Summer EBT Record Linkage](#) for more details.
- If possible, preemptively filter out direct certifications that are redundant with children who can be identified through more comprehensive queries of program databases. If not, include identifiers in the direct certification process that can be used to uniquely identify individuals at a later point, such as case numbers.
- In order to assess the quality of the deduplication process, it is necessary to create a validation or test data set. These are obtained by manually inspecting a random subset of possible matches and labeling them as the same or different people. An alternative is to use an external data source with more reliable shared identifiers, such as repeat SNAP applications linked by Social Security number. Using a validation dataset, it is possible to evaluate a strategy in terms of its *false positive* and *false negative rates* — the relative frequency with which it mistakenly claims that two distinct people are actually one person and with which it mistakenly fails to identify two instances of the same person, respectively. It is best practice when performing deduplication to do so within a maximum,

pre-determined false positive rate while attempting to minimize the false negative rate. For streamlined certification, this would involve picking a deduplication strategy that keeps the frequency of children being mistakenly prevented from automatically receiving the benefit below an arbitrary threshold — say 1% — while attempting to minimize the frequency with which children receive the benefit more than once. More details can be found in Code for America’s [Best Practices for Summer EBT Record Linkage](#).

- If you are worried about setting up robust deduplication processes for streamlined certification in 2024, see [this section](#) for tips on workarounds for 2024.

Matching data between Summer EBT applications and school enrollment

- Summer EBT applications will typically involve free-text form elements that are used to match NSLP school enrollment. School enrollment data is often supplied without an awareness of this application, and the need for precision. Consequently, matches between applications and enrollment are unlikely to succeed at a high rate if they are required to be exact.
- [Fuzzy comparison methods](#) are essential. Allow for minor typos and transpositions in names and birthdays.
- Use a mix of matching strategies with different tolerances. For example, “blocking” or requiring an exact match on date of birth but allowing childrens’ first and last names to differ by up to two characters, or using exact matches on last name with the possibility of transposing the month and day of month fields. Alternatively, as a one-stop solution, use automated probabilistic record linkage.
- Some examples of matching strategies employed by states when implementing direct certification can be found [here](#), including a mix of exact and fuzzy matches and a number of multi-pass approaches.
- More tips and recommendations can be found in [this section](#) and in the [Best Practices for Record Linkage document](#).
- There are also some short-term workarounds for data matching suggested in the [2024 versus 2025+ section](#).

Obtaining administrative funding and determining a staffing plan and budget

- See the [Laying the Foundations for Summer EBT](#) section for high-level suggestions on planning for staffing and budget, with particular consideration of data and technology capacity needs. We recognize that the amount and availability of administrative funding shapes what is possible regarding Summer EBT programmatic capabilities and technology investments of a given state. Given the varying nature of each states' context, however, we do not provide detailed tactical recommendations on obtaining administrative funding in this playbook.

Setting up Summer EBT for 2024 with the long-term in mind

- **Define success according to client outcomes**
 - ▶ Check out our recommended overall Summer EBT outcomes to aim for on [page 15](#) so you can plan with the end in mind.
 - ▶ When the opportunity arises to engage a new vendor, define success according to client outcomes and user-centered best practices.
 - ▶ See our [guide on working with vendors](#).
- **As much as possible, build and plan modularly. Make changes incrementally.**
 - ▶ Some things will be hard to replace. Asking everyone who submits data from schools to learn a new export procedure and formatting requirements will not only cause a lot of angst, it will likely lead to errors and delays. However, changing just the submission system itself (e.g. going from a third-party cloud file storage service to a customized upload portal) will probably be much smoother. Note that in either case, it's important to use a data system that is compliant with PII security rules.
 - ▶ Conversely, some things are easier to change. Deduplication or matching code is easy to improve. Application websites can be iterated on year after year. Identify the things you don't want to have to revisit, and focus on getting those right.
 - ▶ Client service options can be layered in terms of difficulty of implementation and likely impact. FAQs are easy to implement in existing systems and robotic process automation (RPA) can be added to already deployed chatbots. Direct communication with families through their schools and digital outreach requires thoughtfulness and planning but is effective and cost-effective overall. New address update portals may be more difficult to implement, but are probably worth the effort in terms of timely delivery of cards and less time providing support.

- **Don't over-optimize**

- ▶ Although requirements for 2025 are not yet known, trying to anticipate every possible modification of the program will likely lead to systems that are hard to use and take too long to develop.
- ▶ At minimum, here are key things that we know will change after 2024, based on public information shared by FNS:
 - » A statewide Summer EBT application will be required by 2025
 - » Summer EBT applications will not be able to be processed by LEAs after 2024
 - » By 2025, school data will need to be centrally housed and maintained
 - » Alternative income forms will need to be modified to meet Summer EBT application standards
 - » States will be encouraged to identify as many children as possible through optional programs like TANF, FDPIR, and Medicaid, and the creation of statewide lists of Other Source Categorically Eligible students like foster children or migrant youth.

Appendix

Summer EBT vs Pandemic EBT

States may be wondering how they can repurpose their systems from P-EBT (a temporary program which has ended) for Summer EBT (a permanent ongoing program), and what the important differences to keep in mind are. The following table outlines some of the major differences between Pandemic EBT and Summer EBT that have material consequences on how the program must be implemented and how families will access it.

	P-EBT	Summer EBT
Administrative Funding	100% federal	50% state-federal match
Legislative duration	Temporary/Emergency Program that ended in 2023	Permanent
Eligibility	<ul style="list-style-type: none"> • Students receiving free or reduced-price meals at school, including all students attending special provision schools, as long as COVID-related requirements are met and during covered summer periods • SY22-23 only: income-eligible students who no longer attend a school participating in NSLP or SBP due to concerns about COVID • Children under age 6 in households participating in SNAP, as long as COVID-related school or child care requirements are met and during covered summer periods 	<ul style="list-style-type: none"> • Students who <i>were certified</i> for free or reduced-price meals at NSLP or SBP schools • Children who are <i>able to be directly certified</i> for FRP school meals, regardless of whether they attend NSLP or SBP schools • Income-eligible students attending schools participating in NSLP or SBP

P-EBT		Summer EBT
Eligibility for direct issuance of benefits without an application	<ul style="list-style-type: none"> All eligible children This included all students attending special provision schools when COVID-closure requirements were met 	<ul style="list-style-type: none"> Students already certified for FRP meal programs Children able to be directly certified for FRP meal programs Students attending special provision schools who qualify via alternative income forms
Requirement to directly issue benefits	No, but in practice states generally have issued benefits directly when a child's eligibility is known to the state through data sharing procedures	Yes, states are required to issue benefits directly for children identified as eligible in state data sources
School program requirements	<ul style="list-style-type: none"> In most cases, students can only receive benefits if their school participates in National School Lunch Program (NSLP) or School Breakfast Program (SBP) In some iterations, children under 6 receiving SNAP where child care closures occurred and home schooled/virtual students that previously attended NSLP operating schools that are income eligible for FRP 	School-aged students able to be directly certified <i>do not</i> need to attend a school participating in NSLP or SBP; non-school-aged students able to be directly certified and students qualifying by application <i>do</i> need to attend an NSLP or SBA participating school
Application	Optional component of state implementation.	<ul style="list-style-type: none"> Required to determine eligibility for students attending special provision schools who are not able to be directly certified or identified as categorically eligible, as well as for those who become eligible during the summer period or did not apply for free or reduced-price school meals Statewide Summer EBT application will be a required component of state implementation, beginning in summer 2025

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