Summer EBT NSLP/SBP Enrollment Database Requirements

By 2025, all Summer EBT agencies must establish and maintain a comprehensive database containing the enrollment information of children attending schools that participate in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP). This database is required for all participating states and Indian Tribal Organizations (ITOs) and must have sufficient information and functionality for states/ITOs to confirm whether a child is enrolled in an NSLP/SBP school.

What information does the Summer EBT database need to have?

At a minimum, each child's record must contain the child's name, date of birth, the school/school district where they are enrolled, mailing address, individual free or reduced price eligibility status (when applicable), and any other information the state or ITO deems necessary to issue benefits timely and with integrity (7 CFR 292.12(c)(1)).

How can I tell if my database meets program requirements?

For Summer EBT, the database requirement is met if your database supports the functions described in program regulations, i.e., enrolling children for Summer EBT benefits and detecting and preventing duplicate benefit issuance (7 CFR 292.12(c)). The database requirement can be satisfied with an existing database or network of databases. In general, you can tell your database meets regulatory requirements if:

1. All NSLP/SBP free and reduced price children within the state or ITO are streamline certified;
2. Benefits are issued for all children within regulatory timeframes;
3. Children who attend NSLP/SBP schools are not issued duplicate benefits.

Which Summer EBT agency is responsible for the database?

Each agency that administers Summer EBT is responsible for aspects of the database described in their inter-agency agreement. When deciding with which agency the database should be housed, Summer EBT agencies should consider where most of the data is coming from, which agency is processing applications, and any data privacy laws that may affect the sharing or transferring of data. Due to privacy laws, in some cases it may be easier for the database to reside with the education agency that house the Summer EBT NSLP/SBP enrollment data. However, FNA recommends Summer EBT agencies set up their enrollment database in a manner that works best for the agencies.

How can the database be used to facilitate an enrollment check when the database is not housed with the agency that processes Summer EBT applications?

The Summer EBT agency processing applications must find a way to connect information from the application (such as child's name, date of birth, and school) to the agency that houses the database. Listed below are some ways that have worked for Summer EBT agencies to facilitate an enrollment check when the database is not housed with the agency that processes Summer EBT applications. In these scenarios, the state education agency houses the database.

- The Summer EBT agency processing applications will send information from the application to the state education agency. The education agency will check the database and send back a "Yes" or "No" answer for each child to indicate whether they're enrolled in an NSLP/SBP school within the state or ITO. Secure file transfers or shared drives could be used in this option.
- The database is equipped with an API (application processing interface) that the processing agency could use to transfer their application data directly to the database and get back the "YES" or "NO" answer immediately.
- The Summer EBT application is linked to the database. When the agency that is processing the application receives the application data, the "YES" or "NO" enrollment confirmation is already there and ready for the state's or ITO's review.

Can I use an existing database for Summer EBT?

If a compliant database already exists within the state or ITO, you may not need to build a Summer EBT-specific database. It is not a requirement that the database be exclusively used by, or built for, the Summer EBT program, so long as it can provide data to support confirmation of enrollment in an NSLP/SBP-participating school and prevention of duplicate participation among children attending NSLP/SBP schools.

Are there confidentiality and use requirements for the Summer EBT database?

Summer EBT agencies are responsible for ensuring the confidentiality of the information in the database. The data collected and/or housed in the Summer EBT database, or in a database shared with other programs, is to be used exclusively for the administration of those programs or for providing other social services benefits to eligible children, when allowed by program regulations.

Can states and ITOs share data from their Summer EBT database with each other?

In cases where an ITO administers the Summer EBT Program to a service area within a geographic state that is also administering the Summer EBT Program, states must share the relevant enrollment data in a timely manner so that ITOs have access to the necessary information to issue benefits within their service area without delay.

For additional technical information on databases, Code for America and No Kid Hungry have partnered to release a Summer EBT Database Requirement Guidance document.

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