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Evaluation of the 2019-2022 Summer EBT Demonstration

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Glossary of Common Terms

active consent: households complete an application online or by phone, and those confirmed as eligible are enrolled in the project and issued benefits

benefit exhaustion: when a household redeems all of its benefits during a given period

benefit issuance: when a household receives a Summer EBT card, whether through passive or active consent

benefit redemption: any degree of benefit use to purchase food

cash value voucher (CVV): a financial benefit that allows for the purchase of permitted items (e.g., fruits and vegetables) up to a specified dollar amount

Community Eligibility Provision (CEP): meal service option for schools and school districts in low-income areas. Allows the nation's highest-poverty schools/districts to serve free meals to all enrolled students without collecting household applications

customer support: assistance to participants on how to use benefits or what types of foods they can purchase with benefits. Includes hotlines and in-person assistance at retailers

electronic benefit transfer (EBT): method of providing benefits that loads benefit amounts electronically on a plastic card that recipients can use to make food purchases, as they would use a gift card or debit card

food package: those foods that a household that receives benefits through a grantee using the Food Package (i.e., WIC-based) model may purchase from a preset list that is meant to meet the nutritional needs of school-age children

Food Package model: grantees may choose to implement the Summer EBT project through a Food Package model or Debit Card model. Summer EBT participants receiving Food Package model benefits can redeem their benefits for items from a preselected list of food categories, such as grains, fruit, and dairy

Debit Card model: grantees may choose to implement the Summer EBT project through a Food Package model or Debit Card model. Summer EBT participants receiving Debit Card model benefits can redeem their benefits for any food item at participating retailers

Indian Tribal Organization (ITO): the recognized governing body of any Indian Tribe

National School Lunch Program (NSLP): federally assisted meal program operating in public and non-profit private schools and residential childcare institutions, providing nutritionally balanced, low-cost or no-cost lunches to children each school day

outreach: steps that grantees, school districts, and retailers take to identify eligible households and encourage them to participate in Summer EBT. Includes recruitment efforts for active consent sites and advertisements that encourage benefit use in passive and active consent sites

non-participants: refers to households that received a Summer EBT card but did not redeem benefits (Cherokee, Chickasaw and ITCA) or households that were eligible, but did not apply (Cherokee and Chickasaw)

participation: a *household* having redeemed Summer EBT benefits at any time during a given period; a *child* who was an eligible member of a household that redeemed benefits at any time during a given period having received benefits

passive consent: eligible households are automatically enrolled in the project and issued benefits unless the household opts out of the project

Pandemic EBT (P-EBT): federally funded, State-administered program that provides cash assistance on an EBT card to individuals and families during the COVID-19 pandemic

rates: *participation rate* is the percentage of households that redeemed any benefits; *redemption rate* is the mean percentage of issued benefits that were redeemed by participating households; and *exhaustion rate* is the percentage of participating households that redeemed all issued benefits

School Breakfast Program (SBP): federally assisted meal program operating in public and non-profit private schools and residential childcare institutions, providing nutritionally balanced, low-cost or no-cost breakfasts to children each school day

service area: geographic area within a State or Indian Tribal Organization where Summer EBT benefits are provided. Can vary (e.g., city, county, school district, etc.) depending on characteristics of the local project

SNAP (Supplemental Nutrition Assistance Program): federally funded, State-administered program that provides cash assistance on an EBT card to individuals and families with low incomes to purchase food; previously known as “food stamps”

Summer Food Service Program (SFSP): federally funded, State-administered program that reimburses providers that serve free healthy meals and snacks to children and teens, primarily in low-income areas, during the summer months at designated summer food sites

training (households): help available to households to teach them how to use their benefits and purchase healthy foods through Summer EBT. Can be delivered online, in person, or within a group

training (retailers and school districts): help available to teach owners/employees and agency staff how to allow for redemption of Summer EBT benefits, provide feedback and data to grantees, or assist participants with redemption

WIC (Special Supplemental Nutrition Program for Women, Infants, and Children): federally funded, State-administered program that provides cash assistance to women with low incomes and their children to age 5 to purchase food

List of Common Acronyms

CEP	Community Eligibility Provision
CVV	cash value voucher
EBT	electronic benefit transfer
FNS	U.S. Food and Nutrition Service
IT	information technology
ITCA	Inter Tribal Council of Arizona
ITO	Indian Tribal Organization
NSLP	National School Lunch Program
P-EBT	Pandemic EBT
SBP	School Breakfast Program
SFSP	Summer Food Service Program
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

Executive Summary

In 2021, about 9 million children (12.8 percent) in the United States lived in food-insecure households. During the summer of 2022, nearly one in four adults (23.9%) who were caregivers for children living with them reported that their household was food insecure (Waxman, Salas, et al, September 2022). Food insecurity among children is associated with poor academic achievement and social functioning. During the school year, the National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide in-school meals and snacks to children from households with low incomes. However, during the summer months, those students no longer have access to school meals.

In 2010, Congress enacted the 2010 Agriculture Appropriations Act (Public Law 111-80), authorizing the implementation of demonstration projects intended to reduce summer food insecurity. Under that demonstration authority, the U.S. Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) explored several policy options, among them the Summer Electronic Benefit Transfer (EBT) for Children program. Since 2010, FNS has awarded demonstration grants to 10 States and three Indian Tribal Organizations (ITOs) to pilot different Summer EBT models in a variety of locations.

The Summer EBT program was designed to provide income support during the summer months using the EBT procedures used by the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Eligible households receive a benefit card they can use—much like a typical debit card—at participating retailers to purchase approved food items. The benefit enhances the food purchasing power of households with eligible children.

The value of the benefit has varied since 2010, but across most Summer EBT demonstrations, households received about \$30-60 per eligible child per month, usually for a three-month period (i.e., maximum benefit of \$90-120 per child). For the 2019-2022 demonstration grantees, the benefit was structured as a “food package.” Like WIC’s EBT system, the Summer EBT food package consists of a group of identified foods in specific quantities. Households must purchase approved foods from retailers (i.e., grocery stores, supermarkets, convenience stores, etc.) authorized to accept the benefit.

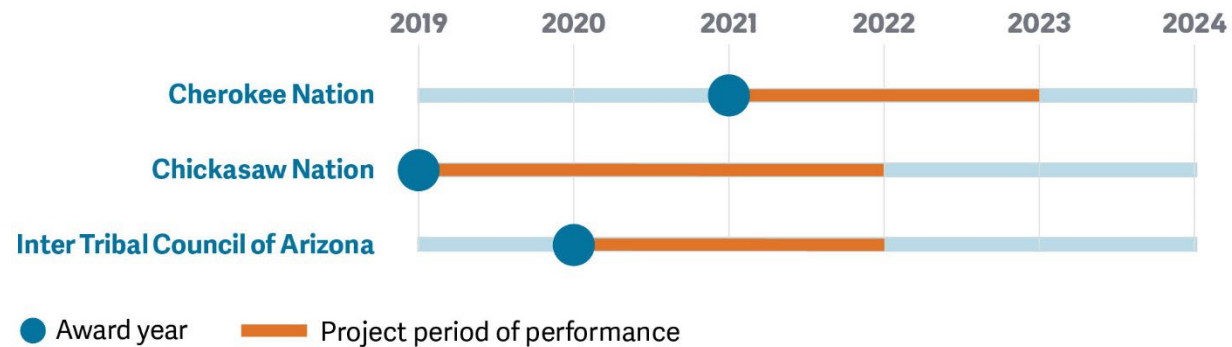
History of the Summer EBT Evaluations

USDA/FNS Summer EBT has operated as pilot projects for more than a decade, with Abt Associates evaluating their effectiveness and outcomes. The first of these evaluations began in 2011 with a nationally representative Impact Study. Then, FNS contracted with Abt to better understand the implementation of Summer EBT and describe participant benefit use in 2015-2018. The Abt team achieved FNS’s objectives by conducting a multi-component study. Its Implementation Study collected and analyzed qualitative data from grantee surveys and semi-structured interviews with FNS-selected grantees, together with cost data from grantee documents and supplementary worksheets compiled for the evaluation. Its Benefit Use Study collected and analyzed EBT transactions data and grantee administrative data to describe patterns of participant benefit use. Its Spatial Analysis acquired and geocoded the addresses of participating households to analyze distances to the nearest retailer and other retailers where households redeemed their EBT benefits.

Evaluation of 2019-2022 Summer EBT Pilots

In fiscal years 2019 and 2021, the USDA awarded two rounds of multi-year Summer EBT grants, funding a total of eight grantees to implement the project for three years each. However, due to the COVID-19 pandemic, the five State-level grantees were exempted from implementation. Only the three ITOs—Cherokee Nation, Chickasaw Nation, and Inter Tribal Council of Arizona (ITCA)—continued administration of their projects in 2021 and in 2022 (Cherokee operated in 2021-2022; Chickasaw in 2019-2022; and ITCA in 2020-2022) period. This report documents Summer EBT operations (the administration of which 19 started in Grant Year 2020) by those three grantees for the summers of 2021 and 2022. All three ITOs administered Summer EBT pilots simultaneously from the Fall of 2020 through the Fall of 2022. Please see Exhibit ES-1 for Years 2021 and 2022 where the three ITOs operated Summer EBT during the same period.

Exhibit ES-1. 2019-2022 Summer EBT Grantees and Their Implementation Status



Note. Chickasaw Nation originally received a three-year grant, spanning 2019-2021, but FNS awarded an additional one-year grant to continue implementation through summer 2022. Cherokee Nation, located in northeastern Oklahoma, was in the second year of a three-year grant (2021-2023).

The evaluation of the 2019–2022 Summer EBT pilots expands on the previous evaluations and includes a **Process Study**, a **Benefits Use Study**, and a **Spatial Analysis**. The evaluation documents how the projects were implemented and administered and describes participant and retailer experiences with Summer EBT. The evaluation also collected and analyzed EBT data from the grantees to describe and assess participant benefit use.

- For the Process Study, the Abt team collected and analyzed qualitative data from (1) semi-structured interviews with grantees, school districts, and retailers participating in the Summer EBT program; and (2) focus groups with parents/caregivers of children participating in Summer EBT.
- For the Benefit Use Study, the team analyzed EBT transactions data to describe patterns of participant benefit use. This analysis also used grantee administrative data on participating households, retailer data from SNAP and WIC transactions, and cost data from grantee documents and supplementary worksheets compiled for the evaluation.
- For the Spatial Analysis, the team acquired and geocoded the addresses of participating households to analyze distances to the nearest retailer and other retailers where households redeemed their EBT benefits.

Report Organization

The report was written as both a resource for FNS to consider in policy decisions that could arise as the program becomes permanent and a technical assistance guide to benefit ITOs designing and implementing programs in 2024.

The report highlights three independent Tribal organizations and their experiences when administering Summer EBT during grant years 2021 and 2022, when all three sites had their Summer EBT programs in operation.

As of the end of the 2021–2022 report period:

- Cherokee Nation, located in northeastern Oklahoma, was in the second year of a three-year grant (2021–2023).
- Chickasaw Nation, comprising a large group of contiguous counties in Southern Oklahoma, had a three-year grant ending in 2021, but received an additional grant to cover 2022.
- Inter Tribal Council of Arizona, serving a set of dispersed geographic areas of Arizona, finished the final year of a three-year grant (2020–2022).

This report highlights several aspects of pilot program administration in these three sites during grant years 2021 and 2022.

Findings

Summer EBT Administration

The 2021 and 2022 grantees who operated Summer EBT—Cherokee Nation, Chickasaw Nation, and Inter Tribal Council of Arizona—represent populations that include high concentrations of families who participate in the free and reduced-price school lunch program and have limited food resources during the summer months. Many households in these areas face additional challenges, such as limited access to transportation and sometimes a lack of electricity and other material hardships.

The service areas of the three grantees differ in their size, population, and density. Each grantee had the flexibility to establish processes and criteria to identify their Summer EBT service area. Cherokee Nation and Chickasaw Nation cover a large group of contiguous counties in northeastern Oklahoma and southern Oklahoma, respectively. Inter Tribal Council of Arizona serves residents in homelands spread across the State.

Program Participation

Among the three grantees, the combined estimated population eligible to participate in the Summer EBT in 2022 was 118,285 children (from 59,662 households). This represents an 11 percent increase over the number of eligible children in 2021. For Cherokee and Chickasaw, the eligible population included children eligible for free and reduced-price meals on the rolls at schools within the grantee's service area during school years 2020–21 and 2021–22. For ITCA Summer EBT, all students on the rolls at schools that participated in Community Eligibility Provision (CEP) during school years 2020–21 and 2021–22 in ITCA service area were eligible.

Patterns of Benefit Use

Between 2021 and 2022, the average **dollar amounts of benefit redemption** per household and per child have increased for all three grantees. The most significant, multi-fold increases were for Cherokee and ITCA populations, which saw substantial boosts to their monthly benefits in 2022. The **redemption rates** increased slightly from 2021 to 2022.

Cherokee Nation. In 2022, 4,869 households were issued Summer EBT benefits, which covered 9,140 children, or 31 percent of all eligible children in the service area, a decrease of 12 percent (43 percent of eligible children were issued benefits in 2021). Participation among households where benefits were issued increased slightly, from 76 percent to 79 percent from 2021 to 2022. The total number of children in households that redeemed Summer EBT also increased, from 57 percent in 2021 to 60 percent in 2022.

Chickasaw Nation. In 2022, 22,055 households were issued Summer EBT benefits, which covered 44,710 children, or 53 percent of all eligible children in the service area. Among households that received Summer EBT, 94 percent participated. The participation rate among children, calculated as a percentage of all children in households that received Summer EBT, was 95 percent.

Inter Tribal Council of Arizona. In 2022, 2,632 households were issued Summer EBT benefits, which covered 4,848 children, or nearly all eligible children in the service area (some Summer EBT cards were returned as undeliverable by the United States Post Office (USPS)). The number of eligible children covered in 2022 increased 18 percent. Relative to 2021, participation among issued households increased from 43 percent to 70 percent. The total number of children in households that redeemed Summer EBT also increased from 46 percent in 2021 to 73 percent in 2022.

Benefit Use at Retailers. The average household had several retailers available within a 25-mile drive, but many families chose to travel longer distances to redeem their benefits. On average, households traveled 10 miles to reach their most frequently visited retailer. For all three grantees, most Tribal-authorized retailers were supermarkets. A smaller percentage of participating retailers were grocery stores or convenience stores.

Several actions or features of the Summer EBT program facilitated use of the benefit. Among those are providing added and more-detailed information through schools directly to households, increased use of text messages and mobile apps, increases in the value of the fruit and vegetable voucher, and grantee customer support.

Conditions identified as hindering participation included challenges in the redemption process, limited flexibility in food package items and quantities, confusion and lack of labeling, and access to transportation. Through interviews, non-participants identified factors such as confusion about the rules and package requirements, negative previous experiences using the benefit, and lack of access to nearby retailers.

Participant Experience

The effectiveness of any social program depends upon the experience of those who participate in it. The three 2022 Summer EBT sites employed different strategies. They attempted different forms of outreach to help families learn about the program, some more effective than others.

Interviewed participants also shared their experiences with Summer EBT and the specific foods that the program made available.

Outreach. Grantees and school/districts employed multiple outreach methods to raise awareness about the Summer EBT program and reach their local communities. The grantees and parents/caregivers reported strategies for effective outreach, which included (1) employing a variety of outreach methods, (2) having grantee staff dedicated to outreach, (3) engaging school personnel in outreach, and (4) performing outreach early and often.

Advantages. Participants perceived Summer EBT as a critical source of nutrition assistance, filling in gaps in nutritional needs, especially for older children and teenagers. The program was seen as particularly beneficial to single parents (with children in CEP schools) whose incomes were too high to qualify for other nutrition programs. Parents/caregivers were particularly enthusiastic about how the program gave access to high-quality fruits and vegetables. Specific aspects of the program that were of value to them included flexibility to shop where they wanted, that the benefit rolled over from month to month (Chickasaw and ITCA), and the benefit's availability at a time when grocery prices were increasing. The program also provided a degree of flexibility in choices not available in some other programs.

Disadvantages. Some parents/caregivers expressed frustrations with the limitations of the food package and the food items it included. A few said that the foods included were ones their children did not like. Others said they faced a tradeoff between shopping at a larger store, where selection and quality were better but customer service for families using the benefit was often poor, versus a local merchant, which was typically more welcoming but offered lower food quality.

Food package. Program participants appreciated and used the fresh fruits and vegetables benefit, especially noted in Cherokee and ITCA, where that benefit level increased in 2022. They were satisfied with most items in the food package, but wished for greater variety in the food, reporting items in the package their children did not particularly like, such as whole grain bread and low fat milk.

Summer EBT Costs

The costs of the program varied substantially among the sites, which generally corresponded to the number of households served by the site. However, the allocation of costs by category were similar across programs. All sites spent most of their funds on food, with a smaller portion going to administrative costs.

In grant year 2022:

- Cherokee Nation spent 85 percent of its budget on food benefits. The remaining 15 percent were administrative costs.
- Chickasaw Nation spent 92 percent on food costs. The remaining 8 percent were administrative costs.
- ITCA spent 78 percent on food costs and 22 percent on administrative costs.

Some of these differences were likely due to the use of different consent models. The active consent model of Cherokee Nation and Chickasaw Nation may have led to lower administrative costs, as they only provided benefits to families who applied for them.

Implementation Resources

Staffing. Each grantee had two to three full-time staff, with additional part-time staff to help as needed. Typically, the full-time staff focused on year-round operations of Summer EBT, particularly laying groundwork and maintaining relationships, whereas part-time staff processed applications.

Partners. The constellation of partners that made the Summer EBT program possible varied from site to site, although some types of partners were common: (1) schools and school districts; (2) retailers; and (3) other Tribal agencies and local organizations.

- **Schools and school districts** were key partners for the Summer EBT projects, as conduits for information flow between the Summer EBT program and families by supporting program recruitment and participation.
- **Retailers** were local businesses that accepted the Summer EBT benefit and provided access to the foods that the benefit allowed.
- **Other Tribal agencies and local organizations** played a critical role in the program, though the specific agencies and organizations varied by site.

Recommendations for the Future

As of December 2022, the Summer EBT program has been permanently authorized, with the anticipation of a national implementation starting in summer 2024. Current grantees offered three recommendations, as permanent authorization of the Summer EBT program moves forward:

- **Provide training to schools.** Successful pilots were built on solid relationships with schools. Consider training school staff about the Summer EBT program and establishing data-sharing agreements for lists of eligible students.
- **Use schools as critical levers for providing information to families.** Focus group participants and grantees alike discussed the effectiveness of disseminating outreach and informational materials through schools and school districts. Draw upon these existing contacts.
- **Exploit existing WIC-authorized networks.** WIC is a larger nutritional program than Summer EBT and WIC has an established network of existing stores. Piggybacking on this network is a simple, convenient, and straightforward way to quickly expand Summer EBT's network of retailers. Provide training to retailers about the food package items.

Conclusion

The findings of this report offer important perspectives from grantees, participants, retailers, and other stakeholders while providing quantitative analyses of benefit use and spatial factors of the Independent Tribal Organization settings in which Summer EBT operated.

Abt is proud to have been a part of this important work. The Abt team has much to offer as FNS considers policy decisions for the program's implementation over the next year. We look forward to the opportunity to continue the partnership with FNS as Summer EBT is implemented as a permanently authorized program.



I. Introduction

I.1 Context

In 2021, about nine million children (12.8 percent) in the United States lived in food-insecure households ([USDA ERS 2022](#)). Food insecurity among children is associated with poor academic achievement and social functioning (Faught, Williams, et al., 2017).

During the school year, the National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide in-school meals and snacks to children from households with low incomes. However, during the summer months, those children no longer have access to those meals and snacks.

To fill this summer nutrition gap, the U.S. Department of Agriculture (USDA), through its Food and Nutrition Service (FNS) implements summer meals programs, namely the Summer Food Service Program (SFSP) and NSLP's Seamless Summer Option. Historically, those summer programs do not reach most eligible students. Among children who received free and reduced-price school meals in 2021, about 30 percent participated the summer meals programs. That rate of participation exceeds pre-pandemic participation (14 percent in 2019) but still suggests that food insecurity among children increases during the summer.

FNS continues to pursue policies and programs to bridge the summer nutrition gap. In 2010, Congress enacted the Agriculture Appropriations Act (Public Law 111-80), authorizing the implementation of demonstration projects intended to reduce summer food insecurity. Under that demonstration authority, FNS explored several policy options, among them the Summer Electronic Benefit Transfer (EBT) program. Since 2010, FNS has awarded demonstration grants to 10 States and three Indian Tribal Organizations (ITOs) to pilot different Summer EBT models in a variety of locations.

FNS contracted with Abt Associates to study the grantees' administration of Summer EBT, including analyses of implementation activities, benefit use, stakeholder perspectives, and costs.

I.2 Summer EBT Program Description

Summer EBT provides income support delivered through the electronic benefit transfer procedures used by the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Eligible households receive a benefit card that they can use—much like a typical debit card—at participating retailers to purchase approved food items. The benefit enhances the food purchasing power of households with eligible children.

Background on Summer EBT

Summer Electronic Benefit Transfer provided households of eligible children with cash assistance for the purchase of approved foods during the summer months. Eligible children were those qualified for free and reduced-price meals at a school in the covered service area during the most recent school year.

Previous evaluations have shown:

- Summer EBT was successfully implemented across a range of geographic settings using different models for benefit delivery.
- The benefit significantly reduced severe food insecurity among children.
- The benefit improved nutrition outcomes, as children eat healthier foods.

Eligible children are those from pre-kindergarten through 12th grade who are certified for free and reduced-price meals on the rolls in schools within each grantee's service area. Households with eligible children may receive a Summer EBT benefit card for a given summer, but that depends on a fundamental program design decision. Grantees have two choices of whether and how to obtain an eligible household's consent to participate:

- Under a “**passive consent**” model, grantees issue a benefit card to all eligible households, comparable to an “opt-out” approach, whereby all households will receive a card unless they notify the grantee not to deliver one.
- Under an “**active consent**” model, grantees issue a benefit card only to those eligible households that complete an application for benefits, comparable to an “opt-in” approach.

Whether through passive or active consent, a household that receives a Summer EBT card is considered to have been “**issued**” the benefit.

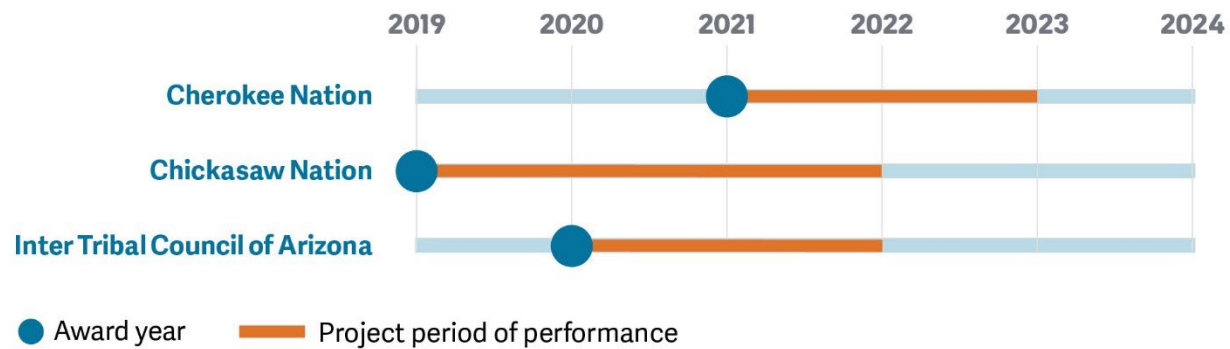
The value of the benefit varied over the study period, but across Summer EBT demonstrations, households received about \$30-\$60 per eligible child per month, usually for a three-month period (i.e., maximum benefit of \$90-\$120 per child). The benefit is structured as a “**food package**.” Like the WIC program's EBT system, the food package consists of a group of identified food items in specific quantities. Households must purchase approved foods from retailers (i.e., grocery stores, supermarkets, convenience stores, etc.) authorized to accept the Summer EBT benefit.

If a parent/caregiver of an eligible child “**redeems**” any of their issued benefit for food purchases, the household and child are said to have “**participated**.” Households have until the end of the summer, typically a date in August or September, to redeem their benefits before the benefits expire. Any household that redeems all of their issued benefits is considered to have “**exhausted**” their benefit.

1.3 The 2019-2022 Summer EBT Demonstration Pilots

In fiscal years 2019 and 2021, USDA awarded two rounds of multi-year Summer EBT grants, funding a total of eight grantees to implement the project for three years each. However, due to the COVID-19 pandemic, the five State-level grantees were exempted from implementation. The three ITOs studied in this report operated their projects through the period (2020-2022) (Cherokee operated in 2021-2022; Chickasaw in 2019-2022; and ITCA in 2020-2022) as depicted in Exhibit 1-1. This report documents the administration of Summer EBT during grant years 2021 and 2022 by the three grantees: Cherokee Nation, Chickasaw Nation, and Inter Tribal Council of Arizona.

Exhibit 1-1. 2019-2022 Summer EBT Grantees and Their Implementation Status



Note. Chickasaw Nation originally received a three-year grant, spanning 2019–2021, but FNS awarded an additional one-year grant to continue implementation through summer 2022. Cherokee Nation, located in northeastern Oklahoma, was in the second year of a three-year grant (2021–2023).

1.4 Data Sources

The data referenced within this report for the three ITOs (Cherokee Nation, Chickasaw Nation, and Inter Tribal Council of Arizona) came from three sources: qualitative data from interviews and focus groups, administrative data from the grantees on the *issuance* and redemption of benefits, and financial data on grantees' grant-funded expenditures.

Interviews and Focus Groups

- Interviews with grantee staff (e.g., Summer EBT project director) were conducted to collect information on project design; plans for the future; and implementation strategies, challenges, and successes.
- Interviews with retailer owners/employees and school district staff were conducted to collect information on their role in implementation and their perspectives on project successes and challenges.
- Focus groups with households that participated were conducted to discuss their experiences using the benefit, outreach and communication strategies, barriers to redemption, and recommendations for improvement.
- Interviews with non-participant households in each of the grantee's service areas were conducted to gather data on why they chose not to redeem benefits though they were eligible.

Administrative Data

- Administrative data from each grantee's management and information system included household-level data such as address and number of children.
- Administrative data from each grantee's EBT system included transaction-level data on issuance and redemption of benefits, including type and amount of food purchased.

Financial Data

- Cost reports were collected from each grantee's accounting system, with information on individual grant-funded expenditures.

1.5 Purpose and Organization of Report

As of December 2022, the Summer EBT program has been permanently authorized, with the anticipation of a national implementation starting in summer 2024. The objectives of this report are two-fold: (1) an informational resource for the FNS as it considers policy decisions and administration and implementation guidance for Tribal organizations starting new programs; and (2) a guide for ITOs as they consider their service areas, potential challenges, lessons learned from pilots, and consent process models. The report is meant for both FNS and ITOs as a practical guide as they look to demonstration pilot experiences when making decisions about Summer EBT for the future.

This report is organized into six primary chapters, each of which summarizes a different aspect of pilot program administration for the purposes of this report, grant years 2021 and 2022:

- Program administration for each of the grantees, including the service areas and populations served, consent types, and benefit packages.
- Program participation of households by site.
- Benefit use patterns, including a summary of benefit use by site, spatial analysis of benefit use, and barriers to participation.
- Participant experiences, perceptions, and preferences.
- Summer EBT costs by grantee.
- Implementation resources, including grantees staffing and partnerships structures.

Each chapter includes findings from interviews with the grantees and/or program participants, and grantee recommendations for future program administration.

A summary chapter at the end of the report discusses overall themes across all three grantees and recommendations to consider for the permanently authorized Summer EBT program.



2. Summer EBT Administration

2.1 Service Area and Populations Served

Overview

The grantees that operated in 2021 and 2022—Cherokee Nation, Chickasaw Nation, and Inter Tribal Council of Arizona—each included high concentrations of families who participated in the free and reduced-price school lunch program and had limited food resources during the summer months. Overall, median household income for each of the grantees was significantly lower than in the United States as a whole, with households from Tribal Nations participating in the ITCA Summer EBT pilot having some of the lowest median household incomes.¹ Many households also had limited access to a vehicle, making it more challenging to access food retailers, especially in rural areas. The grantees considered these and other factors when designing and implementing their Summer EBT service areas.

Geography

The service areas of the three 2021-2022 Summer EBT pilot grantees differed in their size, population, and density. Two areas—Cherokee Nation and Chickasaw Nation—comprised a large group of contiguous counties in northeastern Oklahoma (Cherokee) and southern Oklahoma (Chickasaw). The third area—served by Inter Tribal Council of Arizona—comprised a set of homelands spread widely across the State of Arizona. Each site is described in greater detail below.

Cherokee Nation

In 2021, Cherokee Nation's Summer EBT served five (Adair, Cherokee, Delaware, Mayes, Sequoyah) out of 14 counties (Exhibit 2-1) within its jurisdiction, for a total of 49 school districts. In 2022, Cherokee Nation expanded to serve all 14 counties, for a total of 67 school districts within Tribal lands. The nine new counties that participated in summer 2022 were Craig, McIntosh, Muskogee, Nowata, Ottawa, Rogers, Tulsa, Wagoner, and Washington (Exhibit 2-2). The combined area was predominantly rural, with only a few small towns.

¹ U.S. Census Bureau, 2017-2021 American Community Survey 5-year Estimates.

2. SUMMER EBT ADMINISTRATION

Exhibit 2-1. Cherokee Nation Service Area, 2021



Exhibit 2-2. Cherokee Nation Service Area, 2022



Chickasaw Nation

The service area of the Chickasaw Nation expanded over time. Most of the service area is rural and covers 25 counties (Exhibit 2-3). Parts of 12 counties are within the Chickasaw Nation boundaries and parts of 13 counties fall within the Choctaw Nation's. The expansion of the grantee's services into the Choctaw Nation began in 2016, at the request of FNS. In 2018, the expansion was completed to serve all of Choctaw Nation. More recently, the service area expanded into central Oklahoma's Cleveland and Seminole Counties. In summer 2022, the

2. SUMMER EBT ADMINISTRATION

grantee added services to Pottawatomie County. As of this report, Chickasaw Nation served a total of 184 school districts (Exhibit 2-4), an increase from 171 in 2021, and an estimated population of eligible children of about 84,000.

Exhibit 2-3. Chickasaw Nation Service Area, 2021

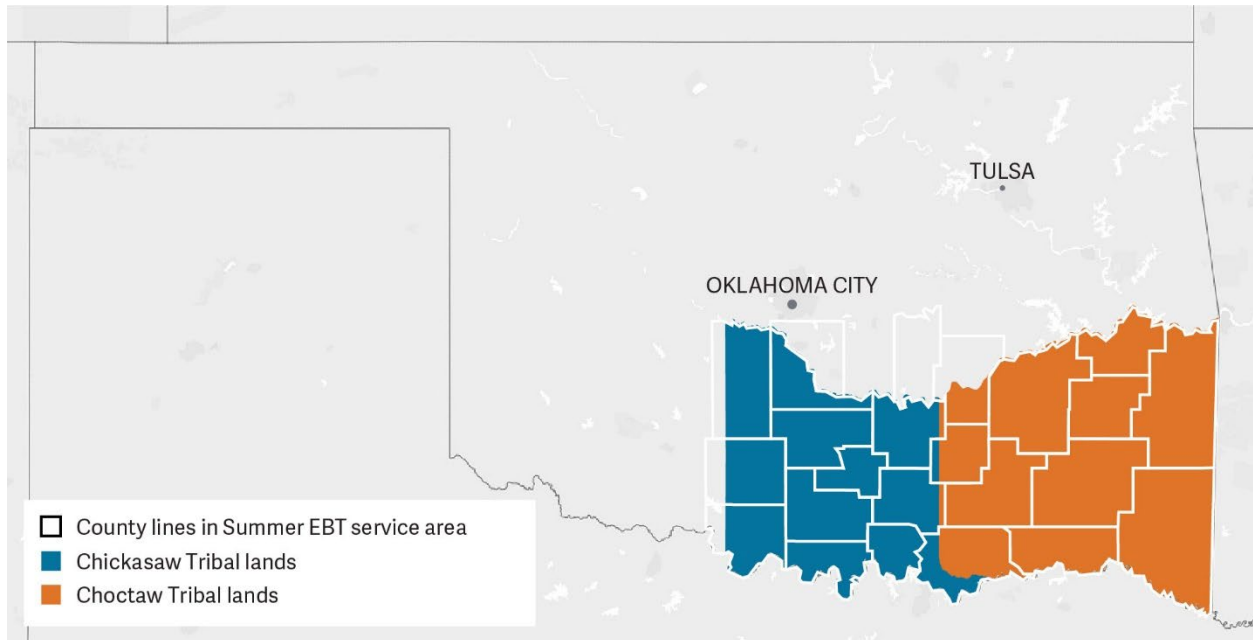
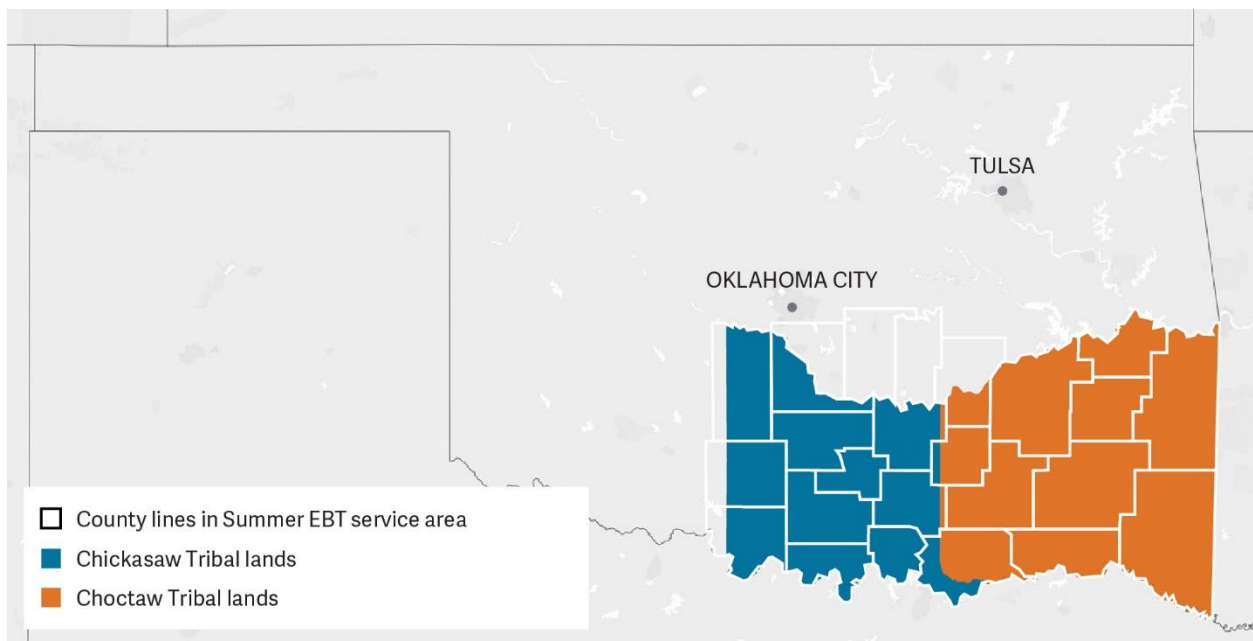


Exhibit 2-4. Chickasaw Nation Service Area, 2022



The degree of rurality varied across the service area. Most of it is categorized as rural, interspersed with some towns, with one suburb of Oklahoma City located in the northwest.

2. SUMMER EBT ADMINISTRATION

Inter Tribal Council of Arizona

In 2021, ITCA operated in 19 schools (Exhibit 2-5). ITCA expanded its service area to 23 schools in 2022 (Exhibit 2-6). All of the schools, including the four added in 2022, elected the Community Eligibility Provision (CEP). In 2022, participation in CEP meant all students on the rolls in those schools were eligible for Summer EBT. This blanket eligibility allowed schools to send their full enrollment lists to ITCA, instead of submitting a subset of students whose eligibility had been directly certified by being eligible for free and reduced-price meals. As a result of CEP, eligibility for Summer EBT increased in the service area's most populous school district, Parker Unified School District, from less than 50 percent to 100 percent of the district's students.

Exhibit 2-5. ITCA Service Area, 2021

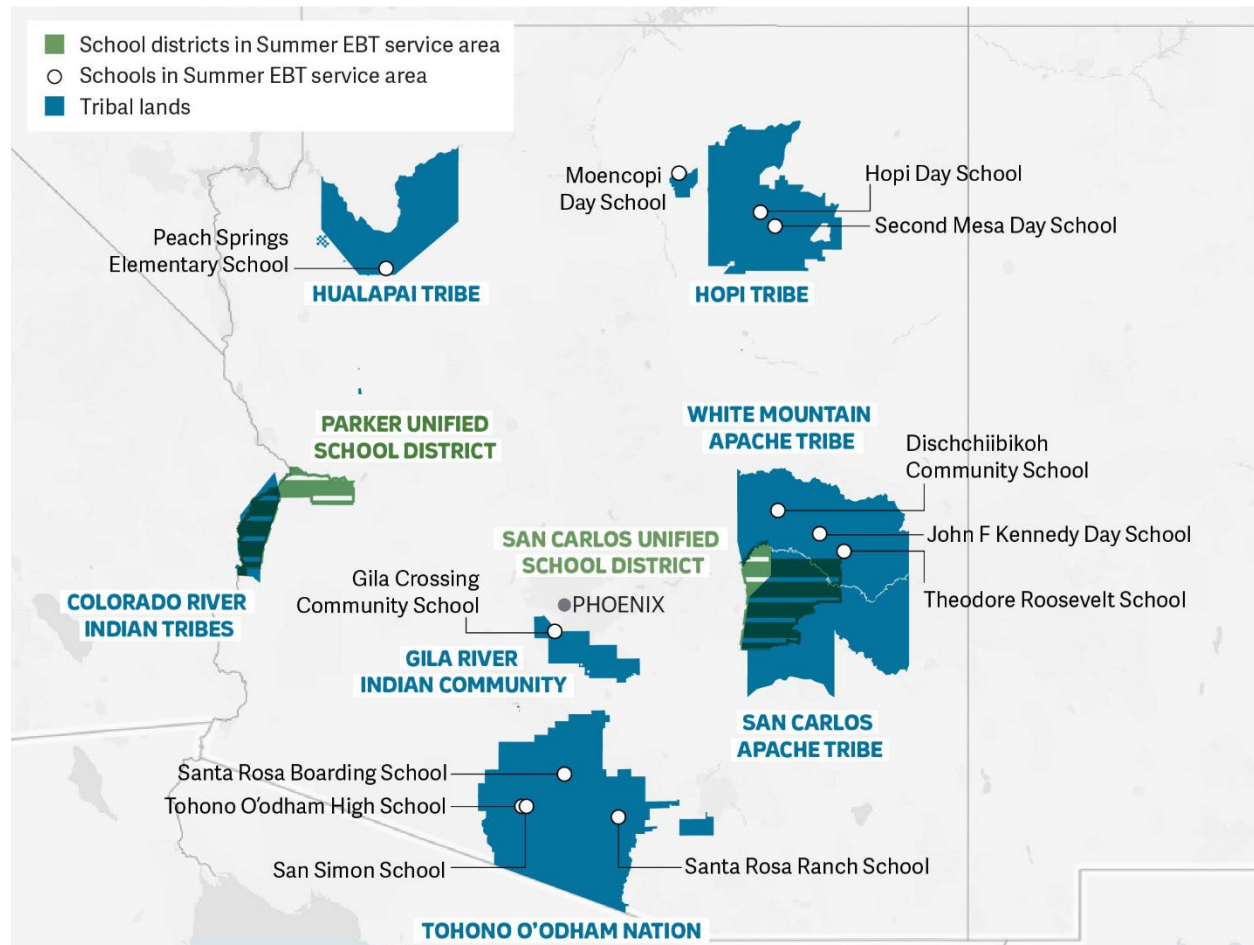
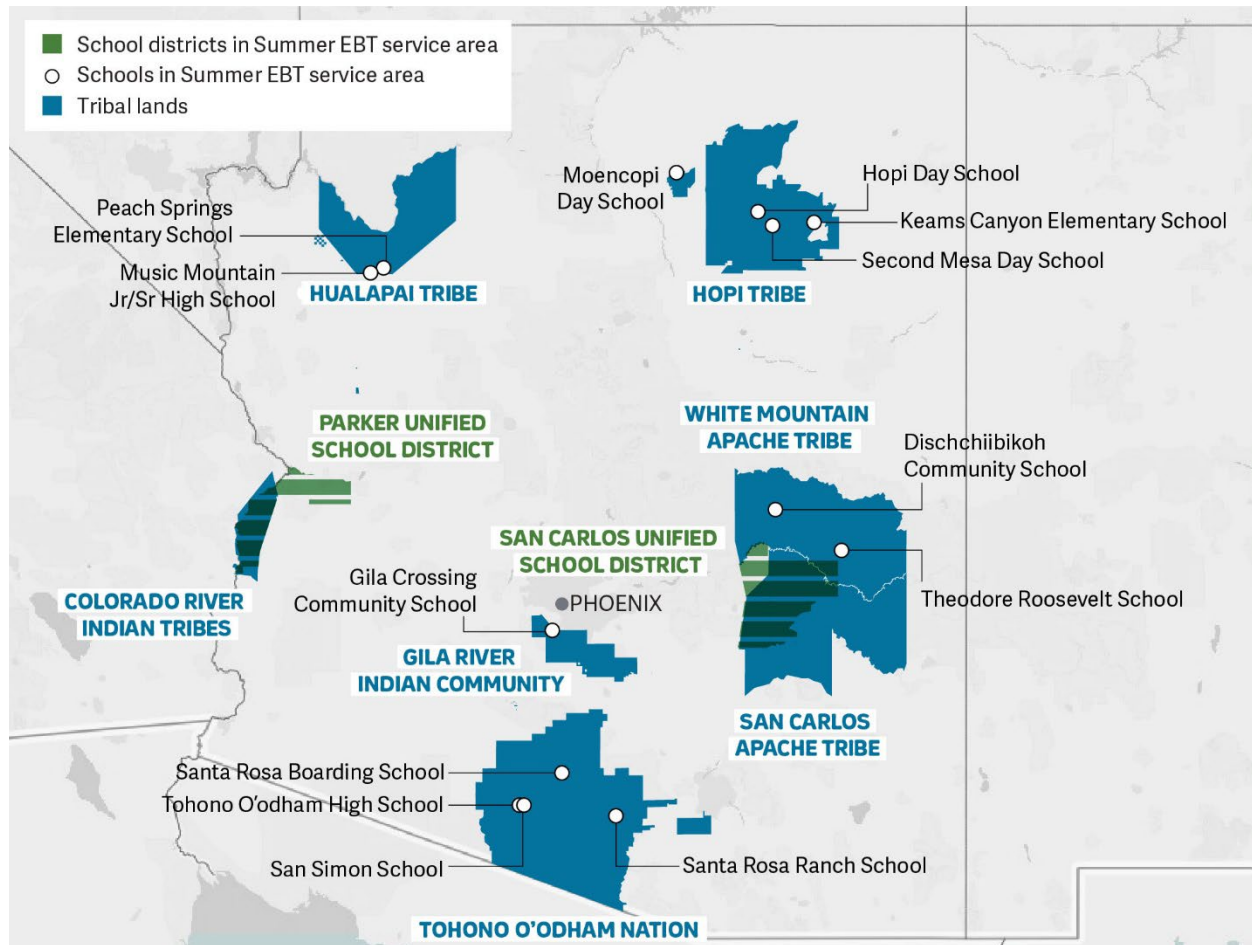


Exhibit 2-6. ITCA Service Area, 2022



ITCA's service area remained rural across grant years 2021 and 2022, with students of several Tribal Nations: the Colorado River Indian Tribes, Gila River Indian Community, Hopi Tribe, Hualapai Tribe, San Carlos Apache Tribe, Tohono O'odham Nation, and White Mountain Apache Tribe.

Process or Criteria Used to Identify Service Areas

Both Cherokee and Chickasaw Nations aimed to serve all eligible students in summer 2022.

Cherokee Nation

In 2021, Cherokee Nation provided services in five counties. Cherokee selected them based on their relative proximity to its headquarters and its WIC program office (both in Tahlequah) and their geographic and demographic characteristics. Grantee staff reported they were more familiar with these counties because of their proximity to the WIC office. Their proximity also allowed staff to work closely with the local school districts. Poverty levels and the prevalence of rural school districts were also factors, as rural school districts tended to have less access to WIC- and Summer EBT-authorized retailers than do urban districts.

“Transportation is huge, for rural areas.”

CHEROKEE GRANTEE

2. SUMMER EBT ADMINISTRATION

In 2022, Cherokee Nation expanded its services to all 14 counties within Tribal lands. However, not all schools within those counties were added to the service area. The lack of participation was due to confusion regarding county lines and whether a school was within the county or not. Staff shortages also contributed to the lack of Summer EBT participation in a few schools within Cherokee Nation's service area.

Chickasaw Nation

Chickasaw Nation was unique in that it also administered Summer EBT for Choctaw Nation. Choctaw did not have the capacity to operate its own program. In 2016, Chickasaw Nation agreed to begin serving Choctaw residents in more than 14 school districts (outside of the Chickasaw Nation's boundaries).

In September 2022, as part of an internal staffing restructuring, Chickasaw Nation added a new outreach coordinator role to the team, which resulted in an increase in the application rates of eligible children in Summer EBT from 44 percent in 2021 to 45 percent in 2022. The coordinator's main job was to encourage eligible schools to participate in Summer EBT and to brainstorm ideas to expand the service area and add more school districts.



We try to reach all of the Free and Reduced students. ...But we don't exclude anyone else and we do outreach to serve everyone.

CHICKASAW GRANTEE

Schools typically participated in Summer EBT based on proximity. Other eligibility criteria, such as students' free and reduced-price meal status were factors. Student participation rates were affected by school leadership. For example, one Chickasaw Nation school district experienced a drop in student participation rates when the superintendent, who had long been a champion of the program, retired.

Inter Tribal Council of Arizona

The ITCA service area, in grant years 2021 and 2022, was primarily made up of individual Tribal schools that were interested in participating in the Summer EBT program. ITCA actively recruited schools to participate, identifying priority schools based on lists and resources from the federal Bureau of Indian Education and the Arizona Department of Education.

Grantee Perspectives on Service Areas

Challenges

Grantees shared several challenges related to Summer EBT administration and implementation. One primary theme that emerged was the difficulties rural communities faced in accessing services. For example, ITCA reported that families in remote areas had limited access to grocery stores and food markets. Compared to households in suburban and urban areas, households in rural areas typically had access to smaller food stores that received fewer deliveries and ran out of items more quickly. In addition, both Cherokee Nation and ITCA reported that families in rural areas often did not have access to a vehicle or to public transportation and relied on shared rides to go shopping.



Elderly, families with grand or greatgrandchildren, they couldn't maneuver the online application. They'd fill them out over the phone for them.

CHEROKEE NATION GRANTEE

Many households in rural areas had limited phone and internet access, making program outreach difficult for grantees. Cherokee Nation noted that in some cases, it waived the application requirement and hand-delivered Summer EBT benefit cards to participants who had accessibility challenges. Cherokee gave potential participants the option to complete its application by phone. However, if a potential participant did not have access to a phone or the internet, the grantee waived completing an application altogether and accepted a verbal consent to participate in the program.

In addition to accessibility challenges facing rural communities, ITCA reported an additional challenge in identifying schools that would benefit from the program.

What Worked Well

One theme that emerged was collaboration. Chickasaw promoted its vendor coordinator to a new assistant manager for Summer EBT, in response to the growth in its service area. Since the start of Summer EBT, Chickasaw has grown from 67 stores that initially catered to WIC to 115 stores to accommodate the addition of Summer EBT. Though the program used most of the existing WIC infrastructure, the new role freed up the general manager of Summer EBT to focus on collaborating with WIC, as the two served overlapping populations.

In addition, expanded eligibility helped increase the number of participants. According to Cherokee Nation, some schools did not need to complete a free and reduced-price lunch application prior to participating in Summer EBT. Rather, all students on the rolls at these schools under Provision 2 were eligible for Summer EBT. Within ITCA Tribal lands, most CEP-eligible schools agreed to participate in the program.

Finally, providing additional support to families helped to expand access to the program. Both Cherokee Nation and ITCA found that hand-delivering Summer EBT cards during the pandemic expanded participation. Cherokee Nation helped elderly participants, when they lacked Internet access, complete applications over the phone or in-person at a Tribal WIC office.

Grantee Perspectives on Permanent Authorization

During the 2022 round of data collection, each grantee was asked what it would do if Summer EBT were permanently authorized. Their perspectives are captured in the following section.

Cherokee Nation

During summer 2022, the grantee expanded the pilot to the full 14 counties within its Tribal organization. With permanent authorization, Cherokee Nation would continue to serve the 14 counties.

Chickasaw Nation

In 2022, Chickasaw added Pottawatomie County to its service area, which incorporated an additional 13 school districts. As a result, Chickasaw Nation served 184 school districts in 25 counties. It made the decision to add Pottawatomie because it is adjacent to the previous



Sometimes it's hard to know what schools are there.

Because there's a big list of schools that the State has, but you don't always know if they're on the reservations or not, so are they serving the population that we're targeting. Because, obviously, we're targeting American Indians residing on reservations.

ITCA GRANTEE

2. SUMMER EBT ADMINISTRATION

service area and has many eligible students already participating in the free and reduced-price lunch program. With permanent authorization, Chickasaw will continue to add new service areas as funding allows. Chickasaw will consider adding new service areas after families request to be added to the program.

Inter Tribal Council of Arizona

ITCA will continue to reach out to eligible school districts for inclusion in its service area.

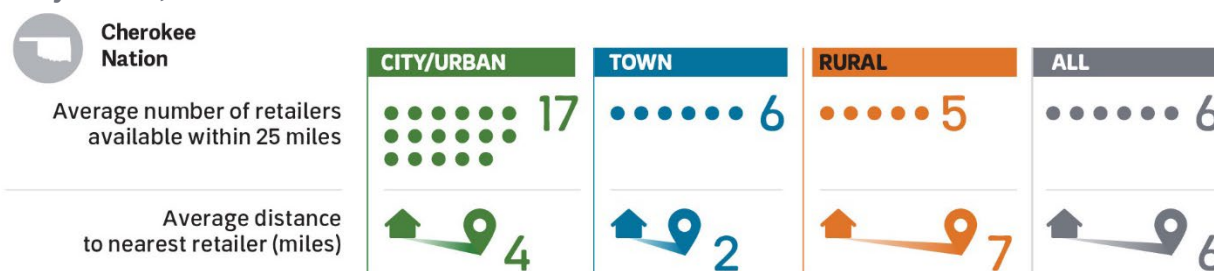
Retailers in the Service Area

Cherokee Nation

Cherokee Nation approved 64 retailers to accept Summer EBT benefits in 2022. On average, households that were issued benefits had six approved retailers available to them within 25 miles of their home. The average distance to the nearest available retailer was about six miles, and approximately 19 percent of households with physical addresses (not PO boxes) had at least one retailer available within one mile. In Cherokee Nation:

- Most households were located in rural areas or towns and had five to six retailers available within 25 miles.
- In towns, the average distance to the nearest retailer was two miles; in rural areas, the average distance to the nearest retailer was seven miles.
- The average household in city/urban areas—which represented less than 1 percent of all households—had 17 retailers available within 25 miles.

Exhibit 2-7. Prevalence and Distance to Retailers Participating in Cherokee Nation Summer EBT, by Locale, 2022



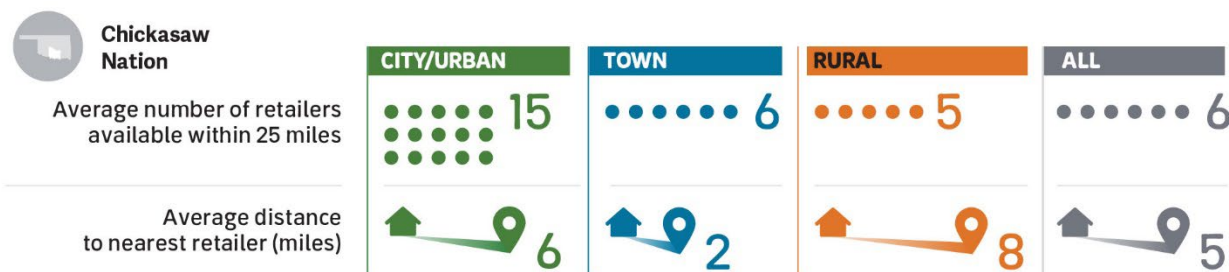
Chickasaw Nation

Chickasaw Nation approved 142 retailers to accept Summer EBT benefits in 2022. Like Cherokee Nation, on average, Chickasaw Nation households that were issued benefits had six approved retailers available to them within 25 miles of their home. The average distance to the nearest available retailer was about five miles, and nearly 30 percent of households with physical addresses had at least one retailer available within one mile. In Chickasaw Nation:

- Most households were located in either rural areas or towns, and households in both types of areas typically had five to six retailers available within 25 miles.
- The distance to the nearest retailer for households in a town (2 miles) tended to be shorter than in rural areas (8 miles).
- Households in city/urban areas—which represented only about 1 percent of all households—averaged 15 retailers available within 25 miles.

2. SUMMER EBT ADMINISTRATION

Exhibit 2-8. Prevalence and Distance to Retailers Participating in Chickasaw Nation Summer EBT, by Locale, 2022

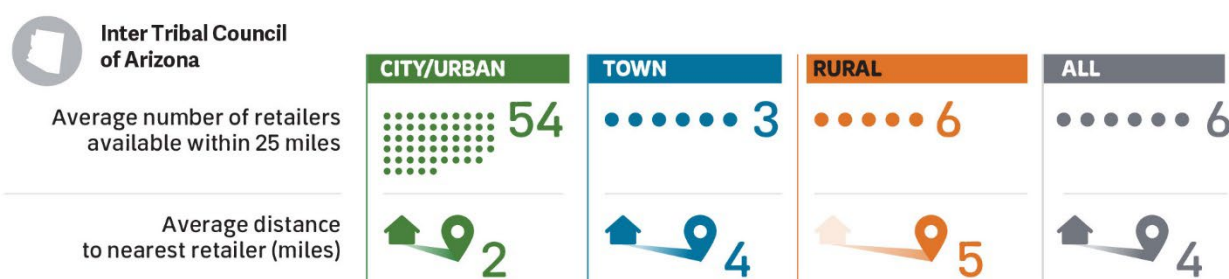


Inter Tribal Council of Arizona

ITCA approved 152 retailers to accept Summer EBT benefits in 2022. In ITCA, on average, households that were issued benefits had six approved retailers available to them within 25 miles of their home. More than half of households with physical addresses had at least one retailer available within one mile. In ITCA:

- The average distance to the nearest available retailer was about four miles.
- About 90 percent of households participating in ITCA Summer EBT were in rural areas or towns. Those in towns were on average four miles from the nearest authorized retailer; rural households were on average five miles from the nearest retailer.
- Households in city/urban areas, which together represented less than 3 percent of households, had an average of 54 authorized retailers available within 25 miles and were an average of two miles from the closest one.

Exhibit 2-9. Prevalence and Distance to Retailers Participating in ITCA Summer EBT, by Locale, 2022



2.2 Active and Passive Consent

ITOs had the option to choose the form of consent they would use for participation. Some used a model of *active consent* in which households had to apply for the benefit and completed an application to participate; others used a *passive consent* model in which all eligible households were automatically enrolled if they qualified for free or reduced-price school meals, unless they explicitly opted out of participation. In both models, the grantees built a partnership with their schools and school districts secured lists of children who were eligible for free or reduced-price meals.

Chickasaw and Cherokee used an active consent model in 2022; ITCA used a passive consent model (an opt-out form was provided by the schools).

Cherokee Nation and Chickasaw Nation preferred an active consent model because they received more accurate household information when households completed Summer EBT applications themselves. Summer EBT applications allowed grantee staff to collect more updated and specific information—for example, if a family wanted their card to be sent to a mailing address different from their usual mailing address, they updated their application accordingly. Preferred mailing addresses allowed for more efficient distribution of benefits, according to both Chickasaw and Cherokee staff.



...I think there are just so many pros to having active consent process because you're getting more accurate household information, up to date household information from parents versus passive consent where you have old addresses or old phone numbers or whatever the case may be.

CHICKASAW GRANTEE

Summer EBT staff from Chickasaw Nation reported that the decision to rely on active consent dated back to a recommendation from Chickasaw's Internal Review Board when the project was first piloted in 2010 and the accompanying evaluation began in 2011 (Collins et al., 2016). Another reason Chickasaw Nation chose an active consent model was because that board required it to “actively choose to be involved in the study” and the grantee “just prefer[s] that families choose to participate.”

In terms of challenges, the active consent model was labor intensive and more expensive to administer than a passive consent model. Yet the passive consent model had specific challenges to overcome before distributing the benefit, such as determining household composition (number of children, the adult to whom the Summer EBT card should be mailed).

Outreach made sense at different points depending on the consent process implemented. For active consent grantees, outreach was most effective if conducted before the application process began. This allowed the maximum number of families to be notified the Summer EBT enrollment was active. For passive consent grantees, outreach was conducted prior to and as benefits were issued—so those who received the card knew what the card was, its purpose, and how to use it.

2.3 Food Package and Issuance

Overview

The three ITOs operated their Summer EBT pilots on a WIC-based Food Package model. The biggest changes in all three in 2022 was the increase in the “cash value voucher,” or CVV. The next section highlights each of the grantee's food packages and the increases with the CVV.

Food Packages

The food package provided in 2022 was remarkably similar across grantees and ranged from an estimated value of \$55 to \$61 per month. The food package for milk, cheese, cereal, eggs, whole grains, and yogurt was the same across grantees. The primary differences were (a) Cherokee offered both one 16-18 oz. jar of peanut butter and a pound of dried beans in their

food package whereas Chickasaw and ITCA offered a choice of one 16-18 oz. jar of peanut butter or one pound of dry beans or four 16 oz. cans of beans; (b) ITCA had an allocation of \$32 per month for fruits and vegetables whereas Cherokee and Chickasaw had an allocation of \$35 per month.

Cherokee Nation

The estimated value of the food package in Cherokee Nation increased from \$30 to \$55 per month in 2022. Each year, Cherokee Nation's vendor manager and nutrition coordinator determined the Summer EBT food package according to the project budget. The contents of the food package itself remained unchanged from 2021 to 2022.

Chickasaw Nation

The food package in Chickasaw remained relatively consistent over time. Though the estimated value of the food package in Chickasaw was \$61 in 2022, this was unchanged from 2021—and substantially higher than the \$36 provided in 2020. When changes in the food package did occur, Chickasaw staff reported based these changes primarily on recommendations from WIC's Institute of Medicine Review or survey feedback from participants at the end of the year. For example, Chickasaw added yogurt to the benefit package in 2020 in response to survey feedback. The Summer EBT staff in Chickasaw reported that their food package generally aligned with WIC program guidance. The CVV for fruits and vegetables was increased from \$10 to \$35 in 2021, in response to a comparable increase to the CVV voucher in the WIC food package. As part of this change, Chickasaw also allowed Summer EBT-participating households to redeem benefits for canned and shelf-stable fresh fruits and vegetables that met WIC requirements (e.g., low sodium and no added sugar). Prior to summer 2021, the CVV was limited to fresh or frozen fruits and vegetables. During the pandemic, staff noticed the need for items that lasted longer and expanded the CVV options accordingly.

Inter Tribal Council of Arizona

The estimated monthly value of the food package in ITCA was raised from \$30 in 2021 to \$54 in 2022. From 2020 to 2022, the content of the food package remained the same, except for an increase in the allocation for fruits and vegetables from \$8 to \$32 per month in 2022. ITCA created its package using the generic Summer EBT package developed by FNS and the approved product list provided by ITCA's WIC office. The Summer EBT package mirrors the foods and sizes offered by the WIC package, without items specifically for infants, juice, or canned fish.

Issuance and Customization of the Food Package

Cherokee Nation

Cherokee Nation relied on partnerships with schools as well as household information gathered from online Summer EBT applications to identify households with eligible children. Households with children who were eligible for free and reduced-price meals were eligible for Cherokee Nation Summer EBT. To prepare for 2022 Summer EBT, the grantee reached out to school districts in January 2022 to request lists of students who received free and reduced-price meals. The grantee used this information to encourage families to complete an online application for Summer EBT. Cherokee Nation cross-referenced the lists from school districts and the information from the online applications to verify household eligibility.

Households were not permitted to adjust the food package or substitute one food category for another—even if a child had an allergy or lactose intolerance. Grantee staff reported that allowing such changes would have required the issuance of a new card; then a household member would have had to travel to the Cherokee Nation WIC office to pick up the card. Cherokee Nation was considering systems where staff can change food packages for participants without having to reissue their cards.

Chickasaw Nation

Chickasaw ensured that children eligible for free and reduced-price meals were also eligible for Summer EBT. In 2021, an FNS change to project eligibility rules allowed grantees to provide benefits to all students at CEP-participating schools. Students from CEP-participating schools remained eligible in 2022. In previous years, only those children eligible for free and reduced-price meals through direct certification were considered eligible for Summer EBT. At schools that did not participate in CEP, grantees were permitted to rely on eligibility for free and reduced-price meals from the prior year, regardless of whether that eligibility was verified via application or via direct certification.

Because the Chickasaw Summer EBT project relied on existing Chickasaw Nation WIC program infrastructure, the Summer EBT project operated online, meaning that retailers used Summer EBT–integrated cash registers that processed each redemption at the time of purchase and updated a household’s benefit balance in real time. This allowed households’ benefit balances to be updated immediately and ensured that Chickasaw Nation staff could make any necessary adjustments to a household’s benefit balance remotely. Thus, at a family’s request, food items were customized to accommodate individual needs such as substituting lactose-free milk for regular milk.

Inter Tribal Council of Arizona

In 2022, all students at CEP-participating schools were automatically eligible for ITCA’s Summer EBT, which simplified the process of identifying eligible students. In previous years, schools sent lists identifying students eligible for free or reduced-price lunch to the grantee. Schools had minimal trouble providing ITCA with enrollment lists once students were enrolled, but it was a challenge during the pandemic when students attended online classes (particularly for families without Internet or phone access).

The Summer EBT staff were able to use the WIC program’s approved product list to build the Summer EBT food package. Households adapted the Summer EBT food package by substituting lactose-free milk for regular milk; the ITCA system did not allow for other substitutions.

Recommendations from Grantees

- **Consider flexibility to substitute items.** For example, allow a substitution of 2% milk instead of low-fat milk could be advantageous for a food-insecure population, who need higher caloric intake. One Summer EBT director reported that when 2% milk was allowed to be included in the food package during the pandemic, it was received very positively by families. One Summer EBT manager also reported that their Tribe president advocated for getting more traditional and cultural foods on the Approved Product List, such as blue corn.

2. SUMMER EBT ADMINISTRATION

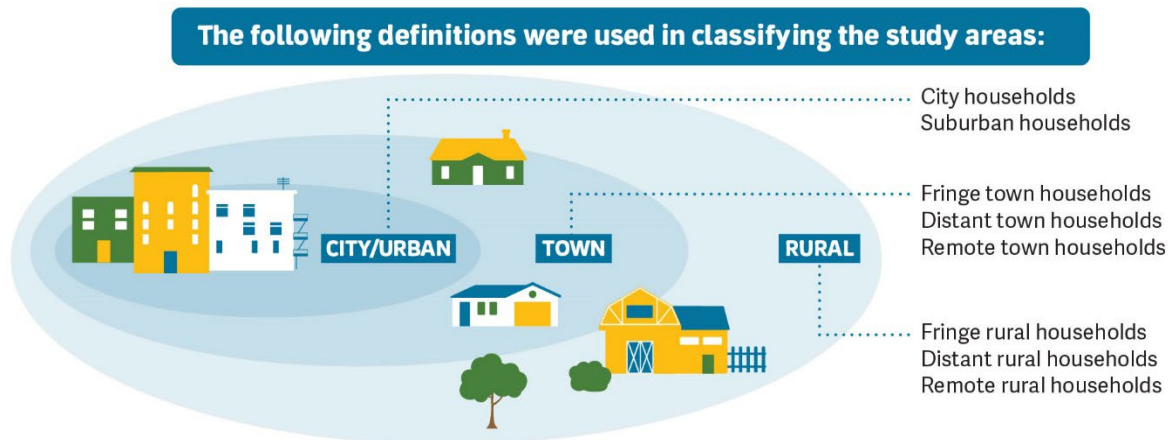
- **Expand the food package.** Grantees recommended increasing the value of the food package and add items such as canned meats and fish.
- **Find ways for households to customize their food package.** By offering more flexibility for households that have children with food allergies, the Summer EBT program can both expand participation and ensure food doesn't go to waste.
- **Separate the Summer EBT help line from the WIC help line.** Grantee staff reported that if families called before their Summer EBT benefits are active, they got the general WIC help line, which causes confusion.



3. Program Participation

Among the three grantees, the combined estimated population eligible to participate in the Summer EBT in 2022 was 118,285 children (from 59,662 households). This represented an 11-percent increase over the number of eligible children in 2021. For Cherokee and Chickasaw Summer EBT, the eligible population was children eligible for free and reduced-price meals at a school in the grantee's covered service area during the 2021-2022 school year. For ITCA Summer EBT, the eligible population was all students on the rolls in a CEP-approved school during the 2021-2022 school year in the ITCA service area.

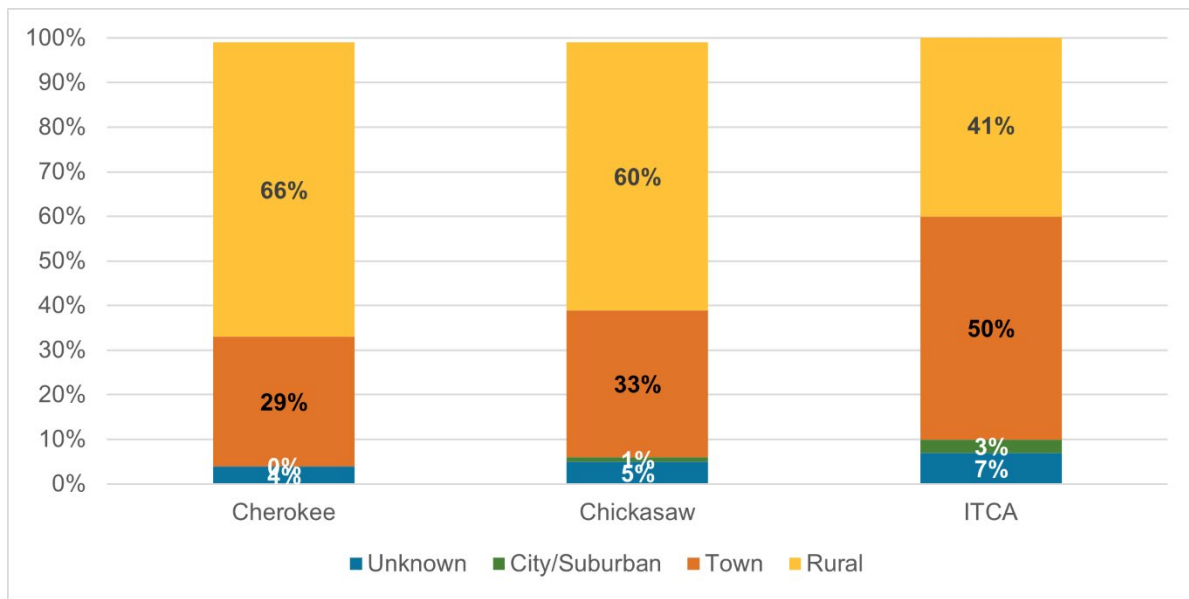
Exhibit 3-1 Geographic Characteristics Definitions



Source: NCES EDGE: [Locale User Manual \(ed.gov\)](https://nces.ed.gov/ipeds/data/edge/)

The geographic characteristics of households issued Summer EBT benefits varied across grantees but had a unifying characteristic—they were overwhelmingly rural and town residents. Cherokee and Chickasaw populations were mostly rural (66 percent and 60 percent, respectively), but ITCA's town population (50 percent) was larger than its rural population (41 percent). City/urban households represented less than 3 percent of each grantee's population. See Exhibit 3-2 for details.

Exhibit 3-2. 2022 Urbanicity of Households with Issued Benefits



3.1 Participation by Site

For the Summer EBT evaluation, *participation* is defined as use (*redemption*) by the household of any amount of the benefits issued to them. The following sections discuss participation rates for each 2022 grantee. Further discussion regarding participation as a summary of recommendations can be found in Sections 3.2 and 3.3.

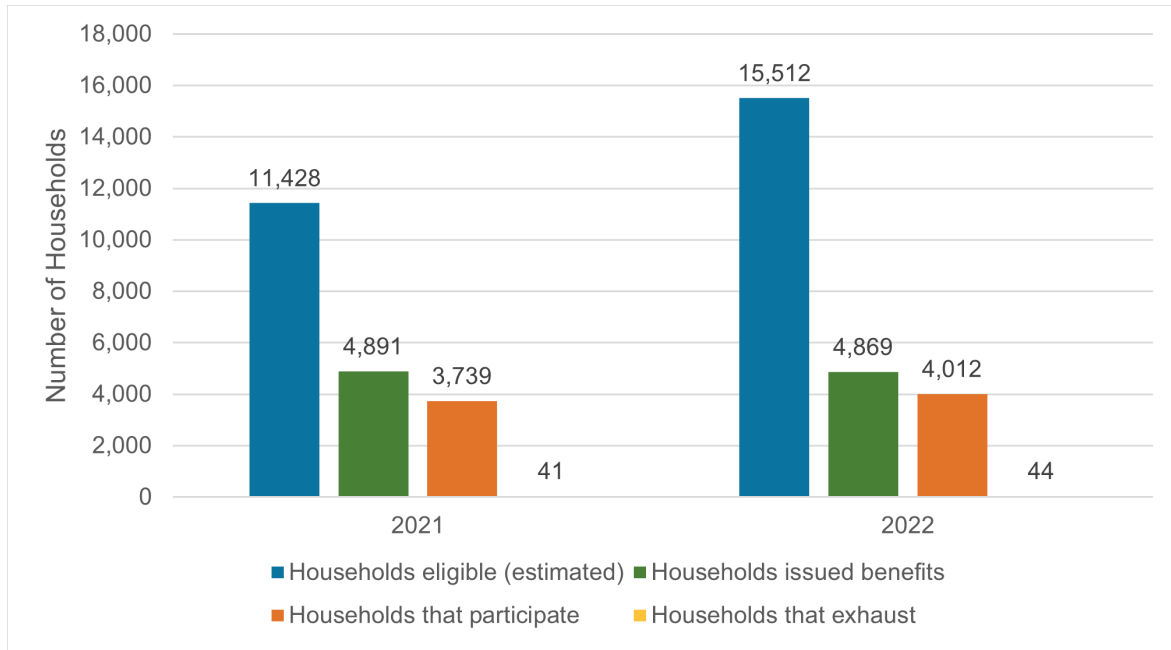
Cherokee Nation

Thanks to the 2022 expansion of its service area from 102 to 146 schools, the Cherokee Nation's Summer EBT project increased the number of eligible households by 36 percent, from 11,428 households in 2021 to 15,512 households in 2022. However, this increase in the number of eligible households did not result in a corresponding increase in the number of households applying for and being issued benefits—4,891 households in 2021 versus 4,869 households in 2022.

The participation rate of households that were issued benefits in 2022 was 82 percent. That household participation rate was an increase of 8 percent from 2021. The share of those participating households that used all funds issued to them (*exhausted* their benefits) remained at 1 percent. See Exhibit 3-3 for details.

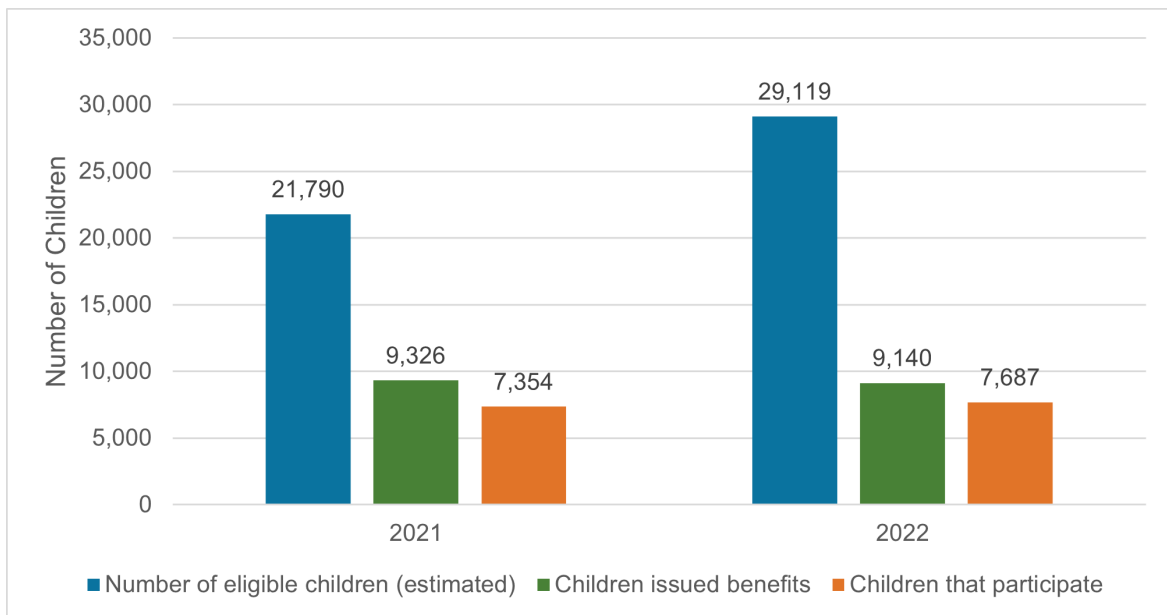
3. PROGRAM PARTICIPATION

Exhibit 3-3. Number of Cherokee Households Issued Benefits, Participating, and Exhausting Benefits



In the 2021-2022 school year, an estimated 29,119 children in Cherokee’s expanded service area were approved for free and reduced-price meals, making them eligible to apply for the 2022 Summer EBT. This represented a 34 percent increase over the number of eligible children in 2021. Of eligible children, 31 percent were issued benefits in 2022, which was lower than the 43 percent issued benefits in 2021. Children’s participation rate increased 6 percent, from 79 percent in 2021 to 84 percent in 2022. See Exhibit 3-4 for details.

Exhibit 3-4. Number of Cherokee Children Eligible, Issued Benefits, and Participating

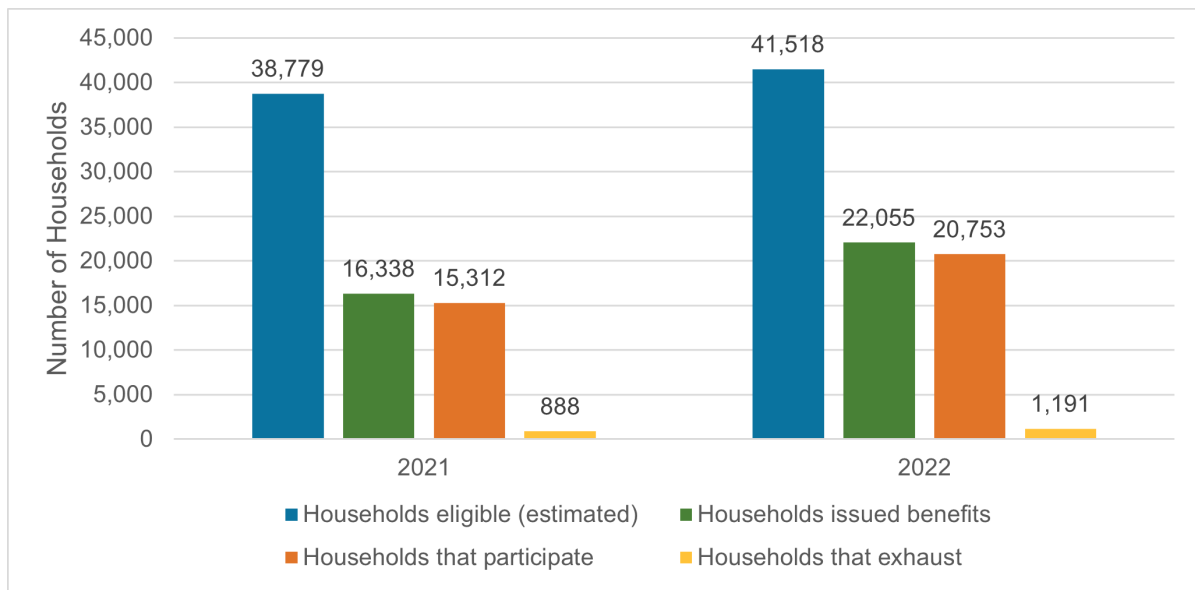


Chickasaw Nation

The Chickasaw Nation's Summer EBT project increased the estimated number of households eligible to receive benefits by 7 percent, from 38,779 in 2021 to 41,518 in 2022. Of eligible households, 22,055 households applied for and were issued benefits, which represents a 35 percent increase over the number of households issued benefits in 2021.

The participation rate of households issued benefits remained high at 94 percent; 6 percent of households issued EBT cards did not redeem benefits. The share of participating households that exhausted their benefits remained about 6 percent. See Exhibit 3-5 for details.

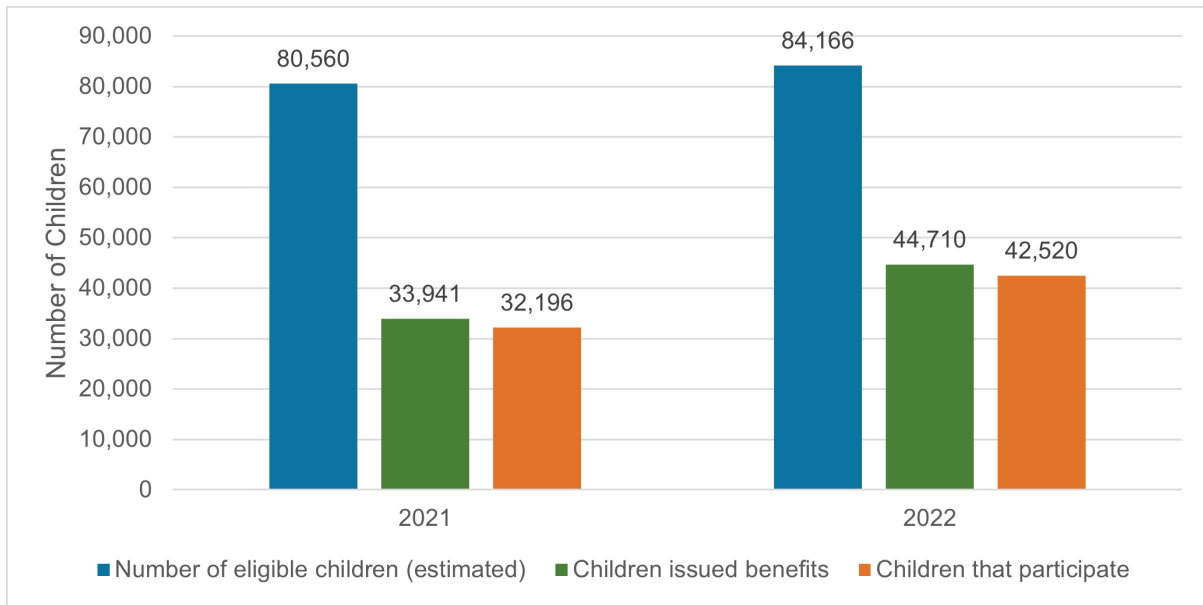
Exhibit 3-5. Number of Chickasaw Households Issued Benefits, Participating, and Exhausting Benefits



In the 2021-2022 school year, an estimated 84,166 children in the Chickasaw service area were approved for free and reduced-price meals, which made them eligible to apply for 2022 Summer EBT. This represented a 5 percent increase over 2021. Of eligible children, 53 percent were issued benefits, which was higher than the 42 percent issued benefits in 2021. Children's participation rate remained the same between 2021 and 2022 at 95 percent. See Exhibit 3-6 for details.

3. PROGRAM PARTICIPATION

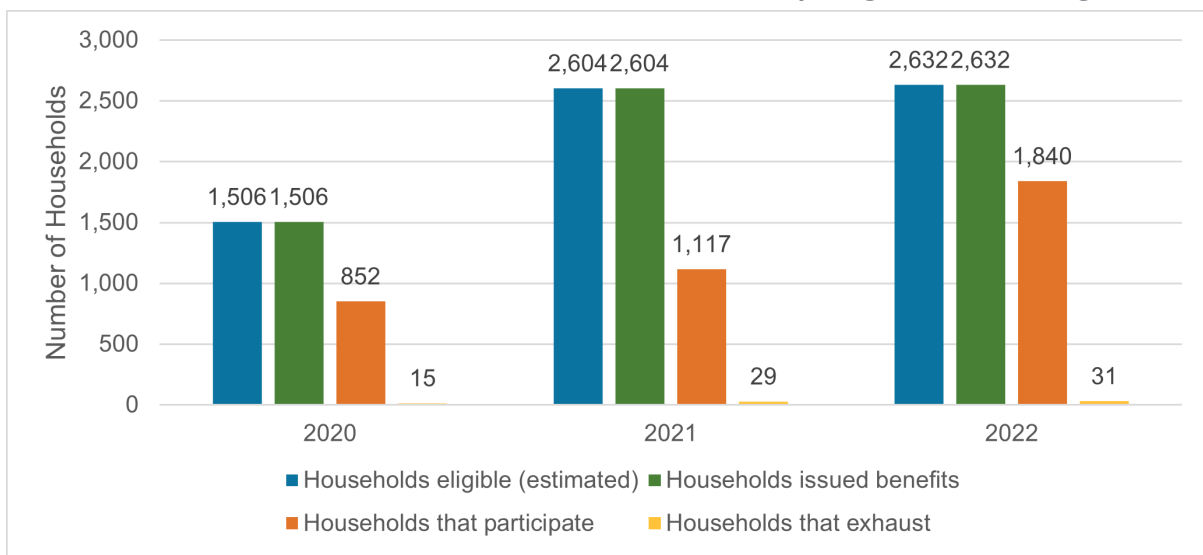
Exhibit 3-6. Number of Chickasaw Children Eligible, Issued Benefits, and Participating



Inter Tribal Council of Arizona

The number of households eligible for Summer EBT benefits stayed nearly the same: 2,604 in 2021 and 2,632 in 2022. However, the ITCA household participation rate increased from 43 percent in 2021 to 70 percent in 2022. The rate of participating households that exhausted their benefits stayed relatively low: 3 percent in 2021 versus 2 percent in 2022. This low exhaustion rate was similar to the Cherokee rate of 1 percent, but lower than the 6-percent exhaustion rate of the Chickasaw project. See Exhibit 3-7 for details.

Exhibit 3-7. Number of ITCA Households Issued Benefits, Participating, and Exhausting Benefits

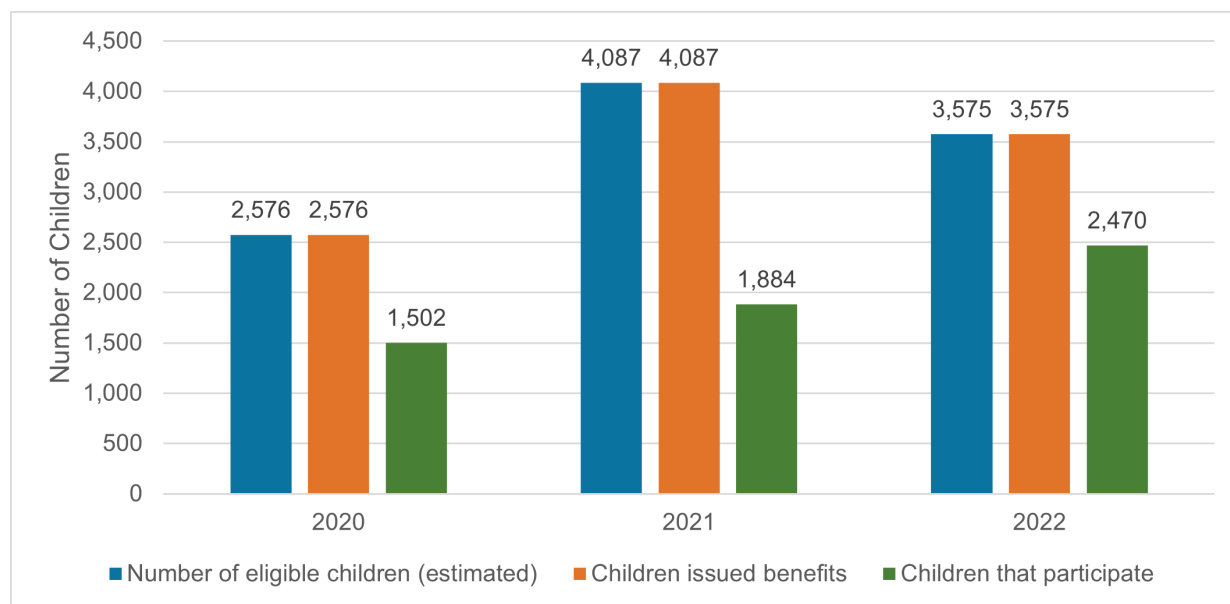


Since 2020 (2020 data included for ITCA as it was a new grantee and operated from 2020-2022 for its first grant period), ITCA consistently expanded its service area. It included four additional

3. PROGRAM PARTICIPATION

schools each year, from 15 schools in 2020, to 19 in 2021, to 23 in 2022. However, the number of students at CEP-participating schools (automatically eligible for ITCA's Summer EBT) dropped from 4,087 in 2021 to 3,575 in 2022. However, the children's participation rate increased 50 percent, from 46 percent in 2021 to 69 percent in 2022. See Exhibit 3-8 for details.

Exhibit 3-8. Number of ITCA Children Eligible, Issued Benefits, and Participating



As the size of a grantee's eligible population and their participation rate increased, so did: a) the need for grantee staff knowledgeable about the program; b) the expansion of outreach to schools and families; and c) the importance of relationships with both schools and vendors. Across all grantees, regardless of the consent type, room for improvement remained for attracting eligible families to participate in the program. Of eligible households, 74 percent (Cherokee), 50 percent (Chickasaw), and 30 percent (ITCA) did not participate in the program in 2022. Sections 3.2 and 3.3 highlight recommendations that might increase participation by eligible households.

3.2 Recommendations from Grantees

When asked how Summer EBT could increase participation rates, 2022 grantees offered the following:

- **Simplify program rules to allow flexibility in food quantities and item selection.** Clear messaging regarding allowable food items and quantities and simplifying program rules will further the goals of the program—improved child nutrition and increased food security during summer months—while making the program more convenient and useful for the populations it serves. Complicated rules can reduce access to and limit redemption of benefits.
- **Authorize adequate funding** for scaling up grantee activities to reach out to the eligible population in need and not served during the demonstrations. Training should include: school engagement, vendor training, and consumer support for participants.

3.3 Recommendations from Participants

When asked how Summer EBT could increase participation rates, 2022 focus group participants offered the following:

- **Expand outreach to eligible populations** using all modes of communication available at schools, such as email, postal mail, text messaging, and social media posts.
- **Engage other State food nutrition programs** to educate their participants as well as their wider audience. This will raise awareness of the Summer EBT program and how it works.
- **Engage with the Tribal Nations' other community programs** to use their channels for outreach, to raise awareness among household elders (less likely to receive communication from schools).
- **Continue to improve communication about program rules** to increase families' understanding of eligibility requirements, food package items, and locations of participating vendors.
- **Work with approved vendors** to provide their staff with training and to hand-out materials on the allowable food package items.
- **Integrate online shopping into the Summer EBT consumer experience**, making it more convenient for busy caretakers, removing the transportation barrier for those who don't have cars to drive to participating retailers, and removing the distance and additional cost barrier of time and gas.



4. Patterns of Benefit Use

The average dollar amounts of benefit redeemed per household and per child increased across all three grantees, including significant, multi-fold increases for Cherokee and ITCA populations, who saw substantial boosts to their monthly benefits in 2022. The redemption rates increased slightly from 2021 to 2022.

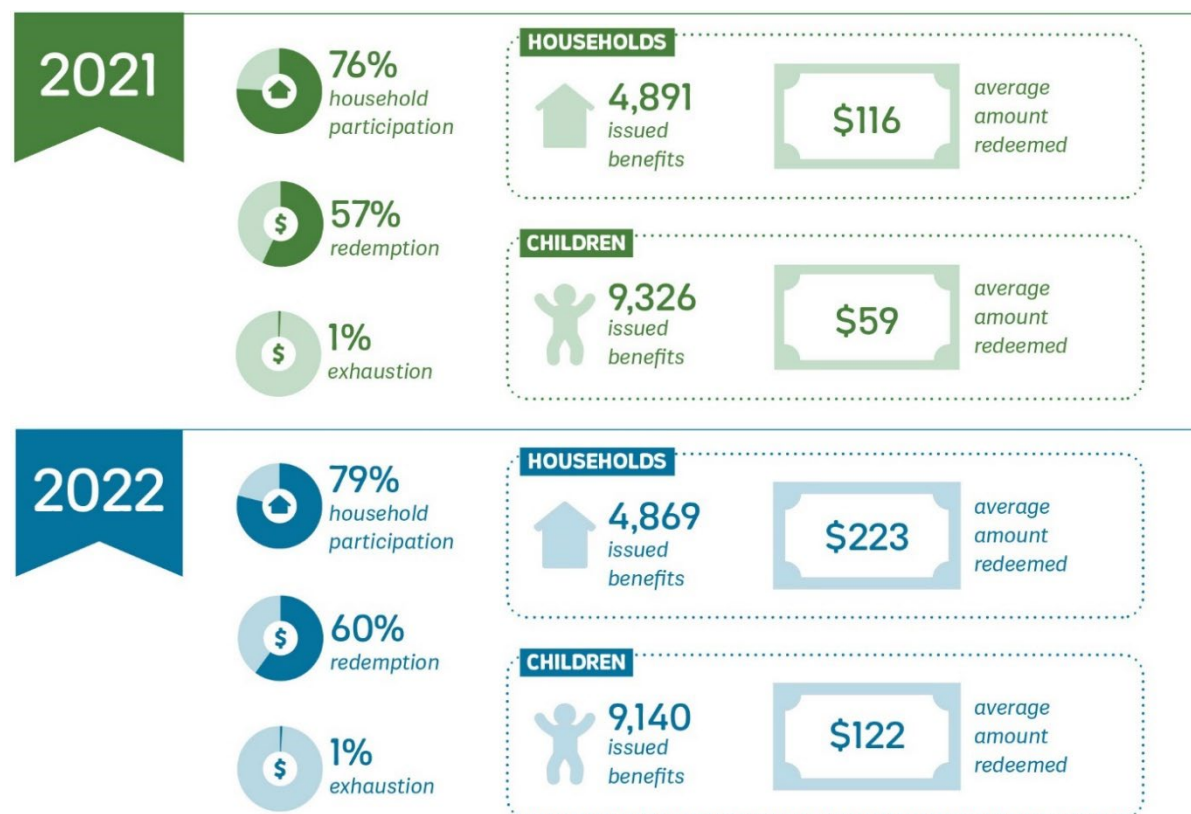
4.1 Benefit Use by Site

Cherokee Nation

In 2022, 4,869 households were issued Summer EBT benefits, which covered 9,140 children, or 31 percent of all eligible children in the service area. Relative to 2021, participation (redemption of any benefits) among issued households increased from 78 percent to 82 percent.

The average 2022 participating household redeemed about 60 percent of the benefits issued, an increase from 57 percent in 2021. The average household redeemed a total of \$223, or about \$122 per child. Though the average redemption rate by household did not change much, the average amount redeemed by household doubled, from \$116 in 2021, reflecting Cherokee Nation's increase in benefits from \$30/month to \$55/month. The most popular foods were cheese and eggs, redeemed at a rate of 91 percent each. The exhaustion rate remained extremely low, with 1 percent of households redeeming their entire benefit amount. See Exhibit 4-1.

Exhibit 4-1. Cherokee Nation Benefit Use, 2021 and 2022



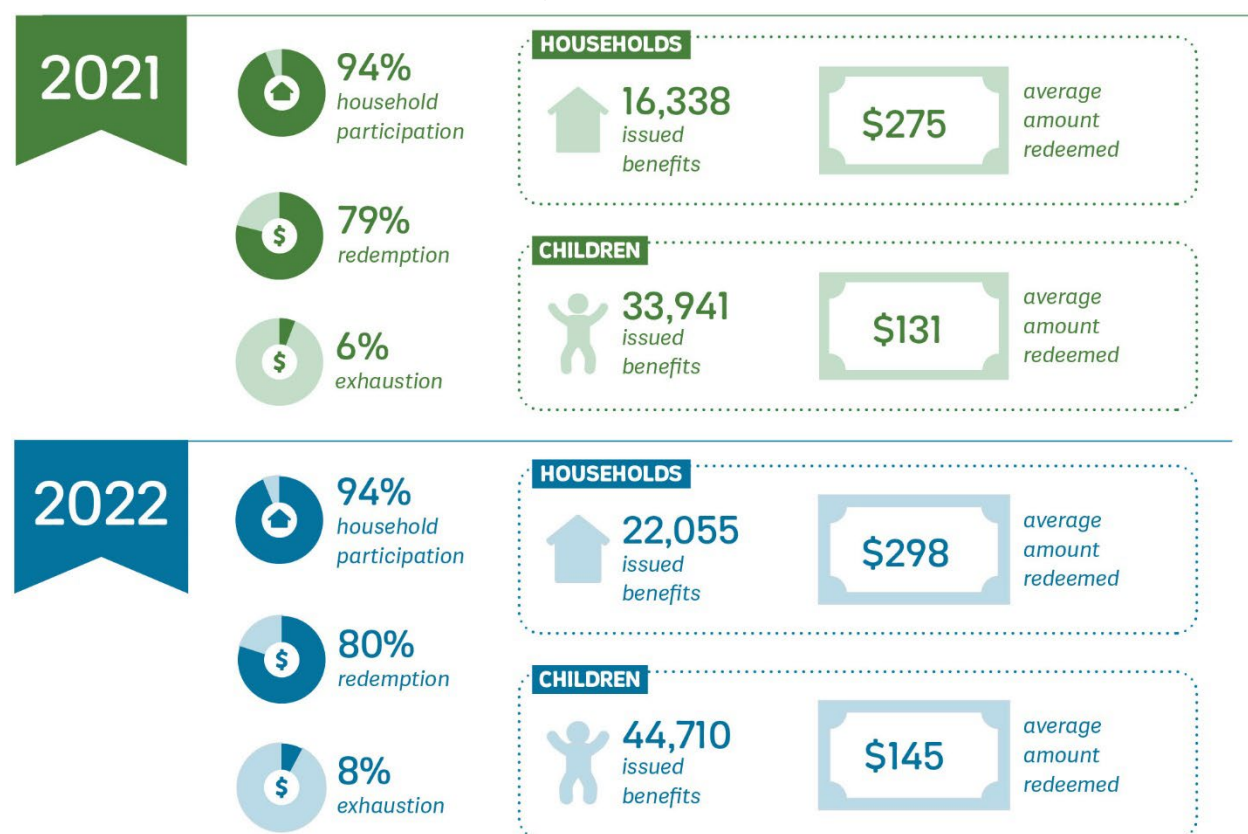
Participation rate = percentage of households that redeemed any benefit. Redemption rate = mean percentage of issued benefits that were redeemed by participating households. Exhaustion rate = percentage of participating households that redeemed all issued benefits.

Chickasaw Nation

In 2022, 22,055 households were issued Summer EBT benefits, which covered 44,710 children, or 53 percent of all eligible children in the service area. Relative to 2021, participation among issued households remained 94 percent.

The average participating household redeemed 80 percent of the benefits issued. The average household redeemed a total of \$298, or about \$145 per child. Relative to 2021, the average dollar amount redeemed increased by \$23 per household, and the share of benefits redeemed remained about the same. About 8 percent of households exhausted their 2022 benefit, an increase from 6 percent in 2021. See Exhibit 4-2.

Exhibit 4-2. Chickasaw Nation Benefit Use, 2021 and 2022



Participation rate = percentage of households that redeemed any benefit. Redemption rate = mean percentage of issued benefits that were redeemed by participating households. Exhaustion rate = percentage of participating households that redeemed all issued benefits.

Inter Tribal Council of Arizona

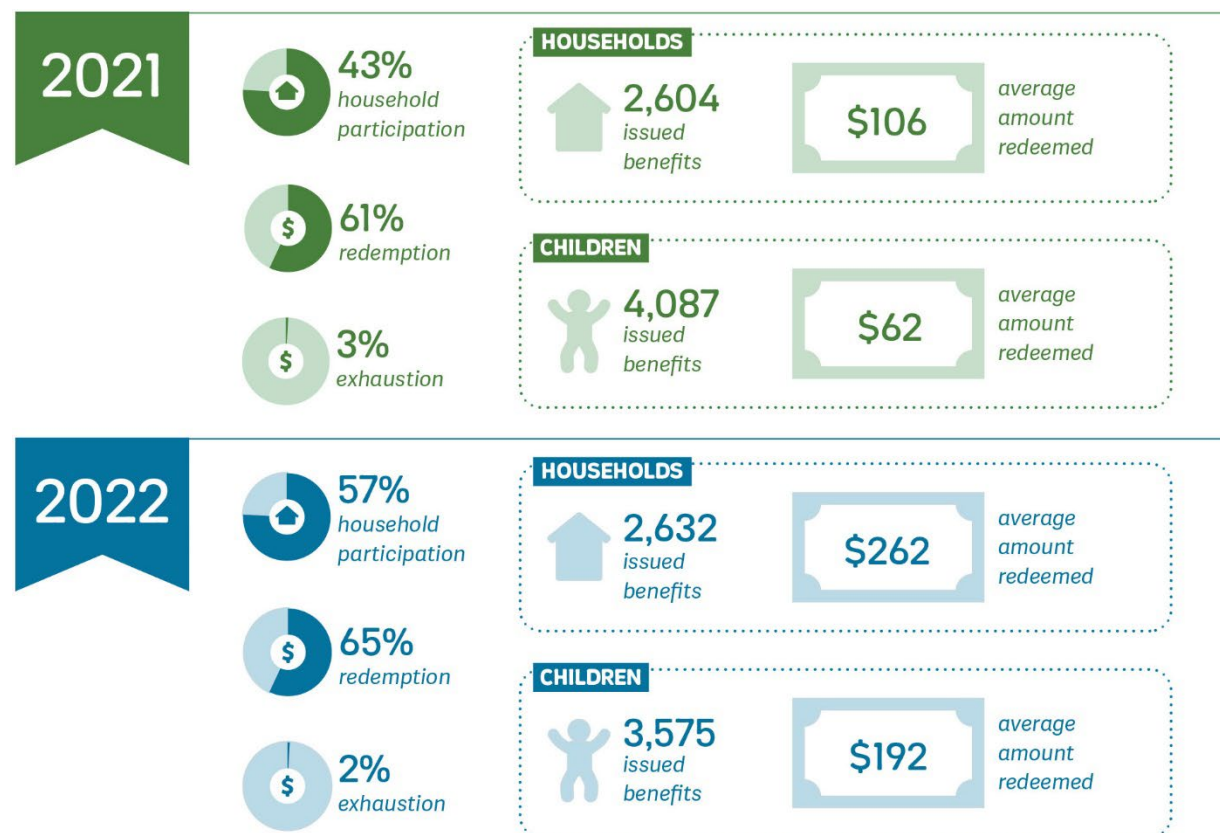
Relative to 2021, the number of households issued Summer EBT benefits stayed relatively the same in 2022, at 2,632 households; however, the number of children covered decreased by 13 percent, to 3,575.

Reflecting the increase in the CVV from \$30/month to \$54/month, the amount redeemed by the average participating household increased more than two-fold, to \$262, and more than three-fold per child, to \$192. Household participation also increased, from 43 percent to 70 percent, possibly due to continued ITCA outreach and increased awareness of the project, as well as the

4. PATTERNS OF BENEFIT USE

increased benefit amount, which made it even more worthwhile for households to use the card. The average participating household redeemed 65 percent of the benefits issued, compared to a redemption rate of 61 percent in 2021. The exhaustion rate decreased from 3 percent to 2 percent. See Exhibit 4-3.

Exhibit 4-3. ITCA Benefit Use, 2021 and 2022



Participation rate = percentage of households that redeemed any benefit. Redemption rate = mean percentage of issued benefits that were redeemed by participating households. Exhaustion rate = percentage of participating households that redeemed all issued benefits.

4.2 Spatial Analysis of Benefit Use

Though the average household had several retailers available within a 25-mile drive, many families traveled longer distances to redeem their benefits.

In Cherokee Nation, the mean distance to the nearest Tribal-authorized retailer was 6 miles; however, on average, households traveled 10 miles to reach their most frequently visited retailer. Approximately 6 percent of participating households traveled farther than 25 miles, with 5 percent traveling 25-55 miles to reach the retailer where they most often redeemed benefits.

In Chickasaw Nation, the mean distance to the nearest Tribal-authorized retailer was 6 miles; as in Cherokee Nation, households traveled nearly 10 miles to reach their most frequently visited retailer. Approximately 8 percent of participating households traveled a distance farther than 25 miles, with 7 percent traveling 25-55 miles to reach the retailer where they redeemed the most benefits.

In ITCA, the mean distance to the nearest Tribal-authorized retailer was only 4 miles; however, on average, households traveled 18 miles to reach their most frequently visited retailer. Approximately 20 percent of participating households traveled farther than 25 miles, with 6 percent traveling more than 75 miles to reach the retailer where they redeemed the most benefits.

Travel by types of stores. Summer EBT retailers were divided into three store types: supermarkets, grocery stores, and convenience stores. For all three grantees, most Tribal-authorized retailers were supermarkets.

In Cherokee Nation, nearly all Tribal-authorized retailers within 25 miles were supermarkets. In Chickasaw Nation, approximately 79 percent of Tribal-authorized retailers within 25 miles were supermarkets; 21 percent were grocery stores. In ITCA, 94 percent of Tribal-authorized retailers within 25 miles were supermarkets; 3 percent were grocery stores and 3 percent were convenience stores.

This breakdown varied slightly by locale for each grantee. In all three sites, Tribal-authorized grocery stores and convenience stores were located within 25 miles of rural households (less than 1 percent each). In Chickasaw Nation, more city/urban households (3 percent) had a Tribal-authorized grocery store available within 25 miles than did town or rural households (less than 1 percent). In ITCA, only supermarkets were available within 25 miles of city/urban and town households; all Tribal-authorized grocery stores and convenience stores were located within 25 miles of rural households (less than 1 percent each).

The supermarket retailer category was the most available and most visited retailer type across all three grantees. This category included both supermarkets and superstores within city/urban, town, and rural locales. Cherokee and Chickasaw households' most frequently visited retailers were disproportionately superstores, which typically include more products than supermarkets. Overall, for households whose most-visited retailer was not the nearest retailer, their most-visited retailer was a superstore more than twice as often as another type, indicating that households could have been more willing to travel farther to reach a superstore than a supermarket, grocery store, or convenience store.

4.3 Facilitators of Benefit Use

There were several actions or features of the Summer EBT program that were identified by benefit recipients during focus groups as facilitating use of the benefit. Among the most prominent of these were:

Provide detailed information on the program directly to households and through schools.

Provide detailed information about the package and approved items at the beginning of the summer/redemption period through multiple methods helps increase the benefit use. Some specific ways that grantees provided this information include mailing informational pamphlets that participants could use in store. Also suggested was: include a list of approved vendors within a 100-mile radius of the school; set up one-on-one calls with participants who needed additional support; and post application deadline reminders on Facebook.

Text reminders. Texts were cited as the most useful method of receiving reminders by both grantees and participants across all grantees. Chickasaw Nation staff found frequent texts to

participants encouraged participants to reach out to grantee staff with any potential issues or questions. The text messages included personalized information about their benefit balances. Grantees saw an immediate uptake in redemption within a few days of text reminders. Similarly, program participants in Cherokee Nation and ITCA reported that texts were the most convenient form of reminders for benefit use.

Increased fruits and vegetables CVV. For Cherokee and ITCA, the increased CVV resulted in higher participation rates and in significant redemption amount increases for both an average participating household and per child. Vendors noticed increased sales and credited the added flexibility of buying canned fruits and vegetables added to the increase.

Use of mobile apps. Cherokee and Chickasaw participants were very enthusiastic about the convenience of using WIC-based shopping apps. They saw the apps as an essential tool for redeeming benefits. The apps made it easier to identify eligible items and quantities and gave them more independence and in-the-moment clarity while they shopped. The ITCA app was available in multiple languages including French, Creole, and Spanish. This increased accessibility for parents/caregivers with limited English proficiency encouraged greater benefit use.

Retailer involvement. Participants appreciated stores where staff were well-trained in Summer EBT. In-store support at specific stores ensured that families could purchase items without concern that the item would be denied at the register. Labeling for WIC-approved items and extra Summer EBT–approved item pamphlets in stores gave shoppers more independence and contributed to lowering their concern of being turned away at the register.

Convenience of the card. The debit-like card allowed participants to buy foods during the month without the stress of buying everything in one purchase per month. Having one card to redeem benefits for multiple children was another important convenience reported by participants.

Extended period of redemption. The extended redemption period (into September) introduced for Chickasaw participants in 2020 continued through 2022 and was reported by the grantee as a contributing factor to increased uptake. Allowing participants to make less frequent trips to the store also reduced their transportation barrier reported by many interviewed participants.

Grantee customer support. Chickasaw staff and participants reported that grantee customer support contributed to the uptake. Grantee staff made calls to verify whether the cards were received. While on the phone, they explained the use of the card and food package requirements. Grantee staff were also available for one-on-one calls to troubleshoot issues.

4.4 *Barriers to Participation*

Focus groups with Summer EBT participants and interviews with non-participants, grantees, and vendors revealed a range of barriers to participation in Summer EBT. Some barriers were unique to participants or non-participants; others affected both groups. This section describes barriers to participation as seen by participants, following by discussion of barriers perceived by non-participants, and their ideas for how to eliminate or alleviate those barriers.

Participant Barriers

Challenging program and redemption process.

Participants from all three grantee populations reported challenges participating in Summer EBT. Some reported the process of redeeming their benefits as challenging, others said people may not understand how to use their benefit cards. Participants suggested that complex program rules can make it difficult for younger parents/caregivers with small children to enjoy the benefits of the program. A grantee also said the program can be difficult for new participants.

Restrictive food package. Participants described the need for greater flexibility in the food package items and quantities. The most frequently reported challenge was finding approved bread and milk in approved quantities at participating stores. Some families preferred to buy in larger quantities for their large families. Others have children with food allergies and wanted a wider selection of milk types.

A few ITCA participants reported that their lack of home refrigeration facilities prohibited them from storing some of the approved items, such as milk, yogurt, fruit, and vegetables. They called for attention to the families that live in homes without running water or electricity. They felt that allowing greater flexibility in the food package, that accounts for the living conditions of the people served by the program, would help people benefit from the program.

Lack of labeling. Many participants found it challenging to determine what food items were approved. The labeling of WIC-approved items (a key support for participants in prior summers) became less consistent with retailers. Lack of labeling and even small, hard-to-read labels led to challenging shopping experiences for participants. Some consumers chose to shop only in stores with WIC labeling. Confusion about item eligibility and lack of labeling in the stores led to embarrassment at the checkout register, when foods picked by participants are denied. This challenge with labeling was confirmed by a retailer as an area where they had been less diligent over the last two years.

Confusion about eligible food items. Difficulty in determining food items' eligibility led to denied purchases because items were ineligible for Summer EBT. Participants reported this diminished their level of redemption. Relatedly, participants discussed and agreed with one another about being stigmatized and



And then you have to think about the region that we're in. A lot of the homes out here do not have infrastructure...

running water or electricity, those are the things that we need to think about. When you come up with these programs, you have to think about the people as a whole and not just based on one little area. Granted, city life, you've got everything you need within a certain amount of area. Here, it's desolate. You literally have to have iceboxes to put fresh vegetables in... And when they make these Tribal programs, when they make these type of programs for Hopi or for Navajo they need to have those considerations.



And it took a few tries going grocery shopping and get up to the counter and be like, you can't get this, you can't get this.

And I'm like, be embarrassed, like, okay, I'm sorry. Holding up the line.

humiliated by both retailer staff and other shoppers. Participants recommended retailer staff receive training.

Out-of-stock items. The lack of approved eligible items in approved quantities (e.g., bread, milk, cereal, yogurt) at the stores where participants shop was another barrier to benefits redemption. Given the distance participants traveled to do grocery shopping, they found it frustrating to arrive at the store and not be able to buy items needed for their families.

Lack of transportation in rural areas. The rurality of Cherokee Nation's and ITCA's service areas posed a significant barrier for participants who did not have access to transportation. This challenge was discussed by both participants and grantee staff as a burden that was hard for grantees to overcome.

Retailer staff ignorance of Summer EBT requirements.

Both participants and grantee staff noted that lack of knowledge of the Summer EBT program and its food package created a barrier to participation and redemption. Chickasaw Nation participants singled out Walmart for exceptionally negative experiences—staff were unavailable and/or unwilling to help. All three grantees confirmed Walmart was a challenge because they were only able to contact Walmart through its headquarters (as opposed to directly with approved stores). Adding frustration was the high staff turnover at Walmart (thus, did not know Summer EBT specifics). Participants contrasted Walmart to other stores where they preferred to shop because store staff were well-trained and knowledgeable of Summer EBT.



Transportation is huge for rural areas. I don't know about the city part of it, but it's huge.

It's a big problem; I think even for getting to WIC office. The services for transportation. Then you put gas prices in there. It's expensive.

Summer EBT cards not delivered. Some Cherokee and Chickasaw participants reported not receiving their benefit card due to unspecified USPS delivery issues. As noted by grantees, those who did not reach out about not receiving the Summer EBT card were not able to participate in the program.

Barriers to Participation as Seen by Non-Participants

Interviews across all grantees with families not currently participating in Summer EBT revealed barriers to participation that stemmed from a lack of awareness of the program and how it works. Some said that negative past experiences while attempting to redeem the benefits led to them not participating in 2021 and 2022. "Non-participants" in this report refer to those that received a Summer EBT card but did not redeem benefits (Cherokee, Chickasaw and ITCA) or those that were eligible, but did not apply (Cherokee and Chickasaw). Key barriers are listed below:

- Complicated rules and food package requirements
- Negative experiences with using the card resulting in a sense of frustration or humiliation
- Unwillingness to use the benefits households felt they should not qualify for assistance

- Lack of access to nearby retailers
- Lack of awareness of participating retailers
- Lost or misplaced cards

Like participants, many non-participants interviewed found the program to be too complicated to use, particularly for what foods and in what quantities, were allowable.

For one non-participant, when they attempted to purchase items, they felt humiliated when the items were denied. Another non-participant sought help from the retailer staff to select eligible food items, but staff were unaware of the program or unwilling to help. Another non-participant also reported their card was denied at two different stores—indicating lack of awareness of approved vendors. Similar to participant experiences, denied cards, declined food items already on the conveyor belt, and unwillingness or inability of retailer staff to help with the items' selection, led to negative experiences.

Some Cherokee and Chickasaw non-participants reported they did not “really need” the benefit and it was not “necessary.” They believed they qualified for Summer EBT only because their children were in CEP schools. The Summer EBT benefit was viewed as an “extra” rather than a need; thus, figuring out the rules was not worth their time. Non-participants reported not knowing at what stores they could use their Summer EBT cards. Others said the stores were located too far from their homes. Other non-participants did not use their benefits simply because they misplaced or lost their cards. ITCA non-participants reported not using their benefits because they were unaware of the program.

Non-Applicants

Cherokee and Chickasaw interviewees did not apply for Summer EBT because they were unaware of the program's existence. One of them believed Summer EBT was the same as Pandemic EBT (P-EBT); four of these non-applicants had participated in either P-EBT or SNAP/WIC. This suggested that grantees could work with the State nutrition assistance programs to raise awareness of the Tribal nutrition programs.



The way the program is set up, you have to buy certain things. You have to know the certain amount...

I don't have the time to mess with trying to figure out exactly what's needed and then go to the store and try to make sure I'm getting the correct amounts in the store.



5. Participant Experience

The effectiveness of any social program depends to some degree upon the experience of the people who participate in it. The three 2022 Summer EBT sites employed different strategies. They attempted different forms of outreach to help families learn about the program, some more effective than others. Through interviews, participants also shared their experiences with Summer EBT and the specific foods that the program made available.

5.1 *Effective Modes of Outreach*

Grantees and Schools/Districts employed multiple outreach methods to raise awareness about the Summer EBT program and reach their local communities. Chickasaw Nation, and its partner, Choctaw Nation, employed a variety of outreach methods including phone calls, text messages, emails, Facebook, word-of-mouth, and the distribution of flyers at many locations such as the local Boys and Girls Club, schools, churches, grocery stores, and summer programs. Chickasaw Nation raised awareness about Summer EBT through a local newspaper, press releases, and public service announcements over the radio.

The grantees and parents/caregivers reported a number of strategies for effective outreach:

Employ a variety of outreach methods. Employing a variety of outreach methods could help reach more members of the community, including hard-to-reach groups such as elder parents/caregivers and the families of high school students. Using technology as a preferred outreach method but not overlooking outreach methods that do not exclusively rely on modern technology or online outreach is critical to reaching diverse groups in the community. Some participants in ITCA reported that elderly community members were not familiar with texting—and may not have access to texts. For these older participants, letters sent through the mail were often the preferred method of outreach.

Dedicated outreach staff. The Chickasaw Nation grantee reported that dedicated outreach staff was an effective strategy for increasing application rates. In 2022, Chickasaw Nation added an outreach coordinator who performed outreach activities, such as meeting with school district staff including superintendents, teachers, and school personnel who help verify student eligibility, to introduce the Summer EBT program. The grantee reported an outreach coordinator helped increase the application rate in 2022 compared to the previous year.

Engage school personnel in outreach. Having school leader buy-in and staff engagement improved the effectiveness of outreach. Participants in Cherokee Nation and ITCA reported that schools were often best positioned to conduct outreach to families. Encouraging school staff and leadership engagement was important for effective outreach. In Chickasaw Nation, a superintendent who was very engaged in outreach single-handedly improved Summer EBT enrollment rates.

Perform outreach early and often. Focus group participants reported that receiving reminders about the program and application period early and often was important for effective outreach. Cherokee Nation grantee staff reported that doing outreach later in the school year was ineffective. With the permanent authorization of Summer EBT, performing outreach early and often will be easier and improve its effectiveness.



So, in the last grant, the 22, part of that restructure change, that staffing restructure that we proposed, was adding an outreach coordinator position. So, we filled that position in September and she has done a lot of work since then with all of the school districts. And she's scheduled Zoom meetings with - sometimes depending on the school and what they wanted. Sometimes it was just the superintendent. Sometimes the superintendent included other school personnel, like the person that helps us verify enrollment and free and reduced status. And I think in a couple of instances they included teachers. And so just depended on what the school wanted to do.

But she would do meetings to explain the program and what we do, how kids qualify, what would provide the kids benefit-wise, and then brainstorm outreach ideas for their school district.

And I think that that has helped increase those application rates this year, from last year to this year, definitely. A lot of the other outreach that we were doing is similar to the outreach we've always done. She's just in charge of coordinating it all.

5.2 Perceptions of Summer EBT

Participants' perceptions of the Summer EBT included their view of its goals and features and their understanding of who is eligible. Participants' perceptions also included the relationship to other food assistance programs and resources and the general perception of Summer EBT in the community. In particular, this section looks at participants' positive and negative perceptions about the Summer EBT program and how it influenced their behavior. Understanding participants' (and in some cases, retailers') experiences of the program provides insight into their motivations and thoughts that drive action or inaction.

Summer EBT was perceived as a critical source of nutrition assistance, filling in gaps in nutritional needs, especially for older children and teenagers. The program was seen as particularly beneficial to single parents with children in CEP schools, whose incomes were too high to qualify for other nutrition programs. Parents/caregivers were particularly enthusiastic about how the program provided access to high-quality fruits and vegetables.

There were specific aspects of the program that were of value to parents/caregivers, according to their responses in the focus groups. Some noted that the program allowed them to shop where they wanted. Others appreciated that the benefit rolled over from month to month. Participants were especially appreciative of the benefit when grocery prices were increasing. Finally, some respondents noted that the program provided a degree of flexibility in choices not available in other programs.

Yet, not all perceived the Summer EBT as flexible. Some parents/caregivers expressed frustrations with the limitations of the food package and the food items that it included. For example, a few of them reported that the foods included were ones their children did not like. Others reported that they faced a tradeoff between shopping at a larger store, where selection

and quality were better but customer service for families using the benefit was often poor, versus a local merchant, which was typically more welcoming but offered lower food quality.

5.3 Participation in Other Programs

Focus group members reported participation in other food assistance programs that met a specific need for food assistance.

Before Summer EBT, Cherokee Nation referred families to other food assistance programs. In addition to WIC and SNAP, it would refer Tribal members to the Food Distribution Program on Indian Reservations (FDPIR) and other Tribal programs. It referred non-Tribal members to churches and food banks, in addition to WIC and SNAP. Some Cherokee parents/caregivers participated in Summer Food Service Program (SFSP), reporting that few schools in their area participated in the program; others were unfamiliar with SFSP. The Cherokee grantee reported that people rely on SNAP and WIC benefits, and students in summer school have access to other summer nutrition food assistance or school summer feeding programs, but otherwise, children are going hungry.

Almost all Chickasaw focus group participants reported they participated in Packed Promise, a Chickasaw Nation program that provides families with monthly boxes of food. Some Chickasaw parents/caregivers reported they participated in SNAP and WIC; some did not participate in other programs.

Many ITCA focus group participants were aware of and had participated in Pandemic EBT for at least one year. They also reported they participated in several other food assistance options in the community including SFSP, food banks, CEP, commodities program, grab and go bags, and the Food Distribution Program on Indian Reservations (FDPIR). Parents/caregivers reported a real need for food assistance in their community, so all these programs are important to them.

5.4 Food Package Preferences

Understanding Summer EBT participants' experience of the program, and how they perceived the food package, underscores the important role of food in people's lives. Socioeconomic factors also have a strong influence on access to and relationship with food consumption, including a family's economic means, education levels, geographic location, and proximity to food sources and suppliers. The below highlights feedback regarding food package preferences:

High-demand items indicated satisfaction with most items in the food package.

Participants and retailers frequently reported certain foods in the package were "best sellers." Most parents/caregivers described easily using up these foods during the month—the most popular foods in the package included eggs, bread, cereal, bananas and other fruit, cheese, and yogurt.

Participants used and appreciated the fresh fruits and vegetables benefit. Most parents/caregivers reported they preferred fresh fruits and vegetables but liked and used all options. They described a wide variety of fresh fruits and vegetables that they typically bought, including watermelon, apples, grapes, bananas, strawberries, carrots, cucumbers, zucchini, mushrooms, Brussel sprouts, asparagus, avocados, lettuce, tomatoes, and potatoes. They also

varied the stores they went to and the foods they bought to avoid poor-quality food (e.g., rotting fruits and vegetables).

Families also took advantage of frozen and canned options, such as corn and green beans, noting frozen vegetables such as broccoli lasted longer than fresh. Another benefit parents/caregivers cited about frozen and canned vegetables was their usefulness to have on hand and saved a trip to the store. One participant was pleased that vegetable-based condiments, such as salsa, counted towards the fresh fruits and vegetables voucher because the ingredients consisted of vegetables. They noted this was helpful because they stocked up on sauces for the winter. Another caregiver said they only purchased fresh fruits and vegetables because they were unaware frozen items could be purchased.

Participants want variety in the foods they eat. Food item flexibility and choice was a recurrent theme. One Chickasaw caregiver described Summer EBT as a package of food options like a menu people can choose from to meet their different food preferences. However, many other parents/caregivers viewed the Summer EBT food package as restrictive. They did not like that only certain amounts of allowed foods were allowed and limited to basic food items lacking in variety. The changes to the types and options of certain foods they desired, included:

- More variety (types/brands/flavors): milk, yogurts, cheeses, beans, cereals, and breads
- More protein options: more eggs
- Drinks other than milk: orange juice, water

Importance of foods that children like. Parents/caregivers frequently described the foods that their children liked. They expressed the desire for items that were popular with children. These high-demand foods included fruits such as bananas and grapes, higher-fat milk, items with added sugar (cereals and juices), and items that came in small packages and varieties of flavors (cereals and yogurts).

Culturally-based food preferences. Parents/caregivers expressed their personal food preferences, demonstrating both narrower and wider palettes and exposure to different foods. These preferences were often influenced by culture and family customs related to food. Some parents/caregivers mentioned several foods that seemed to reflect food customs or cultural traditions common in the grantee's service area. These included higher-fat milk, potatoes, steel cut oats, and excluded yogurt.

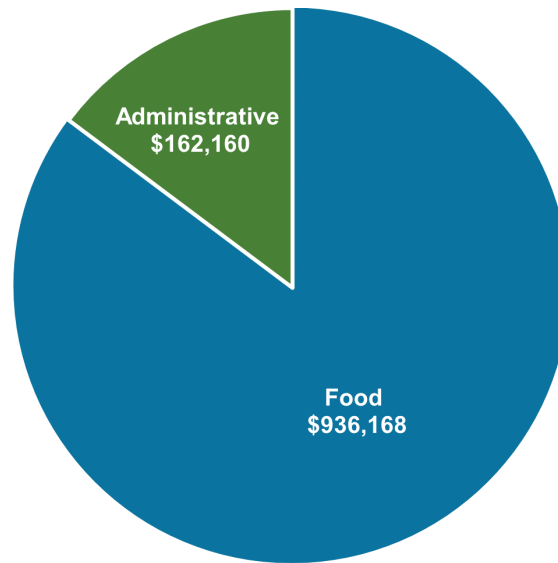


6. Summer EBT Costs

The costs of the program varied substantially among the grantees' programs, which generally corresponded to the number of households served by site. However, the allocation of costs by category were similar across programs. All sites spent the majority of their funds on food and a smaller portion on administrative costs.

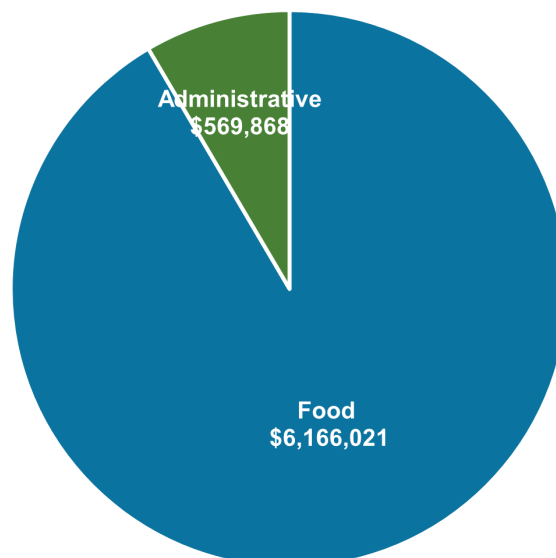
In grant year 2022, 85 percent of Cherokee Nation's \$1.1 million project spending was for food benefits (see Exhibit 6-1). The remaining 15 percent were administrative costs.

Exhibit 6-1. Cherokee Total Project Costs, Grant Year 2022



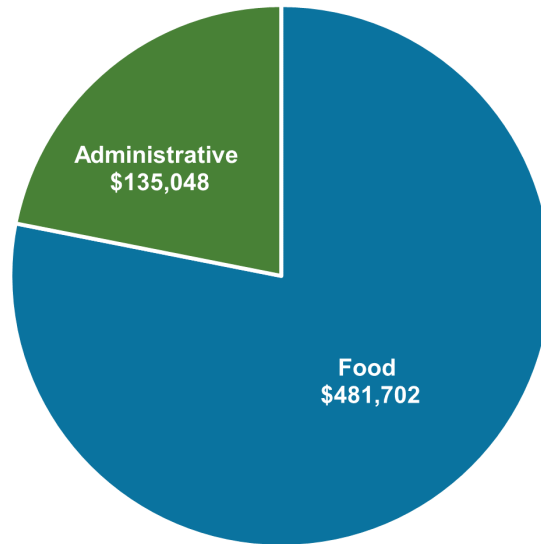
In grant year 2022, 92 percent of Chickasaw Nation's \$6.7 million project spending was for food benefits (see Exhibit 6-2). The remaining 8 percent were administrative costs.

Exhibit 6-2. Chickasaw Total Project Costs, Grant Year 2022



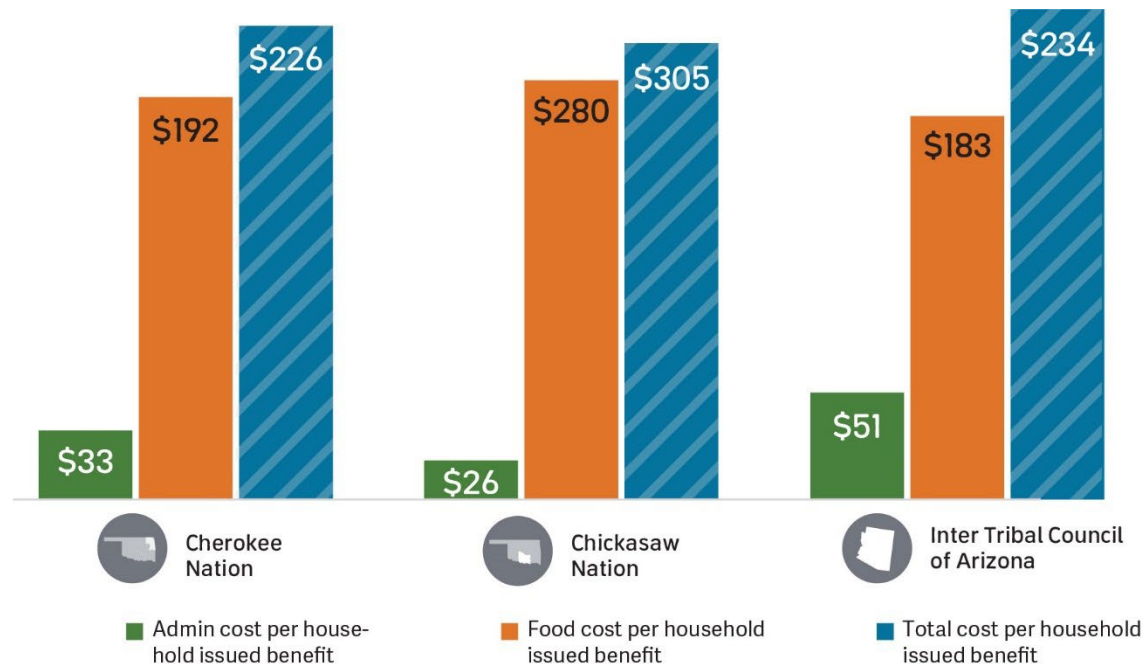
In grant year 2022, 78 percent of ITCA's \$600,000 project spending was for food benefits (see Exhibit 6-3). The remaining 22 percent were administrative costs.

Exhibit 6-3. ITCA Total Project Costs, Grant Year 2022



Costs per participating household varied by program (see Exhibit 6-4). Cherokee and ITCA had similar, lower project costs (\$226/household and \$234/household, respectively). Chickasaw had the highest project costs (\$305/household).

Exhibit 6-4. Costs per Household Issued Benefits, Grant Year 2022



7. Implementation Resources

The following chapter highlights the commonalities across the three grantees surrounding implementation resources and details where they differed.

7.1 Grantee Staffing Structure

Personnel

Each of the three ITO pilots had two to three full-time staff, with additional part-time staff to help as needed. Typically, the pilots' full-time staff focused on year-round operations of Summer EBT, particularly preparing groundwork and maintaining relationships; part-time staff processed applications.

Organization of Responsibilities and Roles

The roles Summer EBT staff fulfilled varied. As Summer EBT has grown, grantees have considered how to restructure their staff to best serve eligible families. The Cherokee administrative officer was responsible for overseeing the program's daily operations and their manager was responsible for supporting and coordinating with schools. Chickasaw's Summer EBT manager explained that the "assistant Summer EBT manager" in years past had focused on vendor management and training, but the title and position changed to "assistant manager" and reflected the broadened scope of the role. That site also added specific roles for an outreach coordinator to help increase the number of applications and a technology coordinator to manage online applications. ITCA had a vendor specialist, who was responsible for recruitment, authorization, and overall coordination with Summer EBT vendors.

7.2 Typical Summer EBT Partnership Structures

Overview

The specific constellation of partners that made the Summer EBT program possible varied from site to site, although there were common partner types across the different locations. Partners included (1) schools and school districts, (2) retailers, and (3) other Tribal agencies and local organizations.

- **Schools and school districts** were key conduits for information flow between the Summer EBT program and families; they supported program recruitment and participation.
- **Retailers** were local businesses that accepted the Summer EBT benefit and provided access to allowable food benefits.
- **Other Tribal agencies and local organizations** played a critical role in the program. The specific agencies and organizations varied by site.

Critical Role of Schools

School districts were key partners for the Summer EBT project, and their primary role was to recruit eligible households and encourage participation. They served as points of contact between the Summer EBT program and families. In the active consent sites (Cherokee Nation, Chickasaw Nation), the school districts were responsible for compiling and sending the grantee

eligible students with their names, addresses, parents/caregivers, and contact information. The grantee used these lists to conduct outreach and ultimately confirm eligibility. In passive consent sites (ITCA), schools were responsible for distributing information about the program and gathering information about families who opt out of the program. ITCA schools collected the information and forwarded it to the grantee.

School and district staff participated in outreach efforts. For example, staff played key roles in spreading the word about the program. School staff sent flyers home with students. They sent emails to families and posted Summer EBT information on their websites and social media accounts. They also connected with parents/caregivers through in-person activities such as teacher conferences, football games, and other school-hosted events. Some schools also provided training webinars on how to use benefits.

Building Retailer Networks

Across the three sites, enrolling retailers into the Summer EBT program was simplified and straightforward largely due to similarities between the Summer EBT and WIC programs. Many retailers participating in Summer EBT were already WIC-authorized and relied on existing WIC program infrastructure. For example, WIC-authorized retailers carried Summer EBT-eligible foods and did not have to add many new items to their food inventories to accommodate the Summer EBT food package.

Similarities between Summer EBT and WIC meant that newly enrolled Summer EBT retailers, many of which had prior WIC authorizations, did not need substantial training. At the beginning of the summer, Summer EBT staff visited each new retailer and provided all retailers a training webinar and information packet explaining the Summer EBT program and redemption processes. Then, before and during the redemption period, staff addressed questions and concerns from retailers as they arose. Beyond initial training, grantee staff also supported retailers located in areas with poor internet connectivity by providing ethernet-based stand-beside devices. Retailers were able to use these devices for Summer EBT transactions.

Overall, retailers were motivated to participate in Summer EBT because the program increased their traffic and sales during the summer months. Though some retailers had to make changes in the types of food stocked in the store (e.g., 1% milk, 16-ounce loaf of bread), they did not consider the costs of these changes to outweigh the benefits of increased business.

Other Partners

Partnerships with other Tribal organizations and local agencies varied by site. For example, the Chickasaw Summer EBT office partnered with many agencies within the Tribal Nation, including Chickasaw's Nutrition Services, Department of Interior Services, IT, Policy and Standards, and Communications. Cherokee Nation and ITCA both worked closely with local WIC program staff to support the implementation of Summer EBT. For example, the Cherokee Nation partnered with WIC public health educators to reach eligible families. When Cherokee Summer EBT staff were unable to reach some rural schools to obtain student eligibility data, these educators used their existing relationships with those schools to obtain the necessary information. Building on pre-existing WIC infrastructure, ITCA used the same WIC data processor for household information and the same EBT processor for retailer and transaction data. Moreover, the WIC program in ITCA amended an existing contract with a mobile application developer to allow

Summer EBT participants to use the WICShopper app, which allows households to scan items for eligibility, review remaining benefits and allowable foods, find participating retailers, and access recipes and nutritional information.

Partnering with various IT and technology organizations was critical for the administration and implementation of Summer EBT (e.g., processing EBT fees, text messaging, mobile app maintenance of WICShopper). The Cherokee Nation used its long-term partnership with SoliSYSTEMS to create its EBT cards, which involved creating a unique Summer EBT design for Summer EBT, embedding a microchip that tracked benefits, and setting PIN numbers for each household. Both Chickasaw and ITCA worked with mobile application companies to support changes to the WICShopper app.

Recommendations for Permanent Authorization from Grantees

Provide training to schools. Successful pilots were built on solid relationships with schools. Consider training school staff about the Summer EBT program and setting up data-sharing agreements for lists of eligible students.

Schools can serve as critical levers for providing information to families. Focus group participants and grantees alike discussed the effectiveness of using schools to disseminate outreach and informational materials available through schools and school districts. Draw upon these existing contacts.

Leverage existing WIC-authorized networks. WIC is a larger nutritional program, with an established network of existing stores. Piggybacking on this network provides a simple, convenient, and straightforward way to quickly expand Summer EBT's network of retailers. Provide specific training to retailers about the food package items.



8. Summary and Recommendations

The COVID-19 pandemic forced several Summer EBT grantees to temporarily suspend their projects, leaving three ITOs to issue benefits in 2021 and in 2022 (Cherokee operated in 2021-2022; Chickasaw in 2019-2022; and ITCA in 2020-2022). This report summarized their administration of Summer EBT during grant years 2021 and 2022. These three grantees offered interesting insights into Summer EBT implementation and administration in Tribal and rural areas, particularly given their different stages of development and combinations of design elements. In the following summary section, we highlight findings and recommendations across the three sites.

8.1 Project Design

The grantees represented three very different stages of project development. The Cherokee and Chickasaw Nations both began their Summer EBT projects in 2012, but the Cherokee Nation did not implement its project in summers 2019 and 2020. After that two-year break, Cherokee restarted its project in 2021 and continued into 2022. The Chickasaw Nation, on the other hand, implemented its Summer EBT project in each of the last 10 years, representing the longest-tenured grantee among the 2021-2022 cohort. ITCA launched its project in 2020, after a planning year in 2019, so summer 2022 was the grantee's third year of issuing benefits.

All three grantees issued benefits via the Food Package model and relied on the existing project rules and infrastructure behind their Tribal Nation's WIC program. The three packages consisted of similar food categories, the contents of which were valued at \$55 (includes \$25 CVV) per child per month for Cherokee Nation; \$61 (\$35 CVV) per child per month for the Chickasaw Nation; and \$54 (\$32 CVV) per child per month for the ITCA. The difference in the amounts were due to varying CVVs for fruits and vegetables, shown in parentheses.

The issuance and management of benefits in Chickasaw Nation and ITCA were handled online; the Cherokee Nation's project operated an "offline" model. In Cherokee, the EBT card was programmed before it was distributed. Any changes to benefits needed to be programmed at a WIC office. In the future, Cherokee Nation would like to transition to an online EBT card due to the logistical challenges and added cost of operating an offline model.

Two projects, the Cherokee and Chickasaw Nations, required active consent into the project. Cherokee Nation had previously implemented a passive consent version of the project; 2021 marked its first year of requiring active consent which it continued into 2022. ITCA passively consented eligible families. All three grantees were satisfied with their chosen approach, but the design decision affects interpretation of key project outputs, namely benefit issuance and redemption, discussed below.

8.2 Benefit Issuance and Redemption

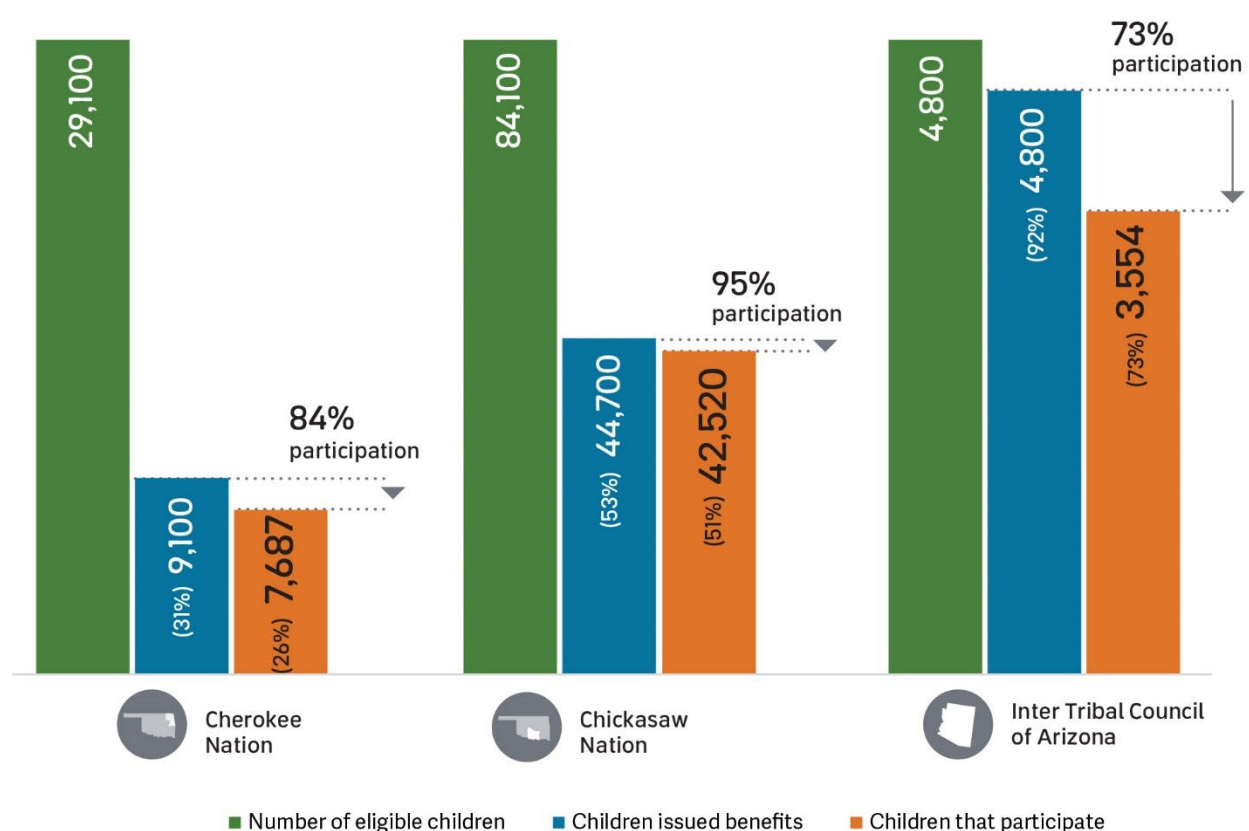
The Chickasaw Nation's project was by far the largest, with an annual estimated eligible population of more than 80,000 children. The Cherokee Nation's eligible population was about one-third of that size, at almost 30,000 children. ITCA's was by far the smallest, at about 3,500 eligible children.

8. SUMMARY AND RECOMMENDATIONS

As the only passive consent project, ITCA issued benefits to the largest share of the eligible population (92 percent, accounting for cards returned as undeliverable by United States Postal Service, USPS). Forty-seven to nearly 70 percent of eligible children submitted an application for Cherokee Nation or Chickasaw Nation benefits. As expected, participation rates were highest among the two active consent sites, as these households actively applied for the benefit. In ITCA, 69 percent of children issued benefits participated (i.e., redeemed any benefit).

There was a range in the percentage of eligible children who participated in Summer EBT in 2022. One-quarter of eligible children in the Cherokee Nation's service area, half of eligible children in the Chickasaw Nation's service area, and nearly three-quarters of eligible children in ITCA's service area participated in 2022. See Exhibit 8-1 for details.

Exhibit 8-1. Benefit Issuance and Participation, Children, 2022



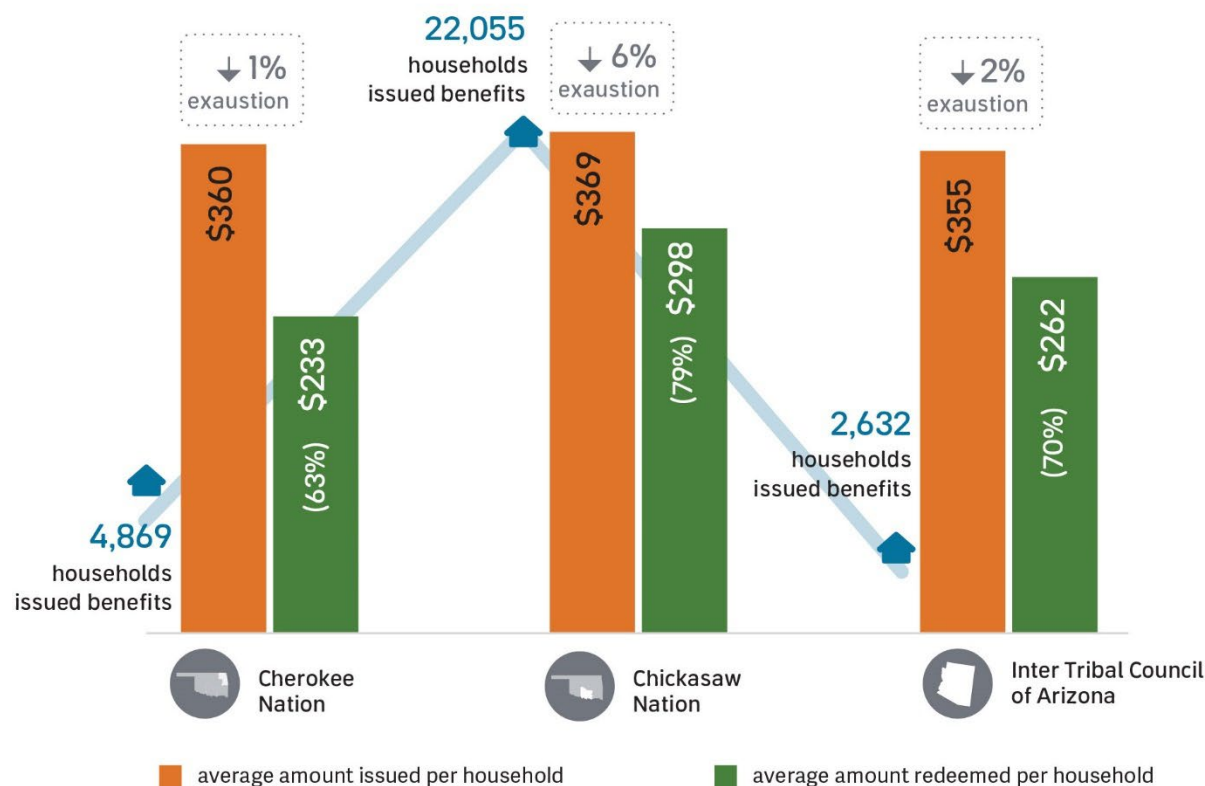
NOTE: Ninety-two percent accounts for ITCA benefit cards returned as undeliverable by USPS or where no contact address was available. The graphic rounds numbers for ease in visualization.

In the active consent sites, the primary barrier to reaching more eligible children appeared to be encouraging more eligible households to apply for benefits. In the passive consent site, the primary barrier appeared to be encouraging more households to redeem benefits issued to them. More research is needed to understand what might provide that encouragement. Those research efforts could also explore the feasibility of increasing the share of eligible children who redeem benefits.

8. SUMMARY AND RECOMMENDATIONS

Household participation rates varied by grantee: Cherokee Nation households redeemed 65 percent of issued benefits; Chickasaw Nation households redeemed 81 percent; and ITCA households redeemed 74 percent. Differences in redemption rates could be due to myriad design and implementation elements. For example, higher redemption rates might be expected among households that actively consent to the project. Or, in Cherokee Nation specifically, unused benefits in one month did not roll over to the next, whereas in Chickasaw Nation and ITCA, households could redeem issued benefits across months.

Exhibit 8-2. Benefit Redemption, Households, 2022



Note: The graphic rounds numbers for ease in visualization.

In all three projects, households consistently redeemed large shares of the egg and cheese items in their food packages. Whole grains and milk were consistently among the categories redeemed at the lowest rates, which is consistent with the feedback collected in focus groups with parents/caregivers. They struggled to find bread in the approved quantity, and their children often either did not like the approved milk options or did not drink as much milk as offered by the package.

8.3 Feedback from Parents and Caregivers

Parents/caregivers almost universally appreciated the Summer EBT benefit and recognized the project as a critical source of support that encourages healthy eating habits among children. Respondents reported that the project increased the total amount of food that households could afford to purchase and shifted the mix of purchased foods toward healthier options.

8. SUMMARY AND RECOMMENDATIONS

In all three grantee sites, respondents suggested that projects should attempt to communicate with eligible households through multiple modes of communication, including direct email, flyers, and social media posts. Schools were particularly crucial sources for these communications and outreach efforts.

All respondents appreciated that Summer EBT allowed for greater flexibility in the redemption of benefits than does the Summer Food Service Program and other congregate meal-based programs. Still, parents/caregivers requested more flexibility in redemption, including the ability to substitute items across categories within the food package.

In general, respondents found the project easy to navigate and the benefit easy to use. However, respondents also reported some difficulties with identifying eligible products and finding certain items. When that happened, respondents wanted “on-demand” assistance, and those familiar with the WICShopper app relied heavily on it. The WICShopper mobile app, available to participants in Chickasaw Nation and ITCA, appeared to be a crucial source for customer support.

8.4 What Worked Well

Each grantee offered a few insights into aspects of its project administration it believed worked particularly well.

All three grantees appreciated the change to Summer EBT eligibility rules that allowed for easier issuance of benefits to children attending CEP schools. By not having to check eligibility status at these schools, grantees saved many hours of effort screening applications.

Both Cherokee and Chickasaw Nations collected applications via an online application website. Their grantee staff reported that doing so allowed for more efficient processing of applications, completion of project integrity checks, and acceptance of applications on a rolling basis.

In all three sites, both grantee staff and focus group respondents considered the dollar amounts added to the monthly benefit for fruits and vegetables a success. Most households made use of that extra benefit.

In Cherokee Nation, the switch from passive to active consent was beneficial to the grantee in several ways:

- **Verify household eligibility.** The grantee had access to eligibility criteria provided by households themselves. The grantee was able to cross-reference this information with the lists of eligible households that school districts provided and double-checked eligibility. Under a passive consent model, the grantee had to rely solely on schools to verify eligibility.
- **Determine household composition.** When parents/caregivers filled out Summer EBT applications in 2021 and 2022, they listed each child within their household. This allowed the grantee to easily and immediately load all benefits for one household onto a single card. Under a passive consent model, schools managed enrollment for each child. For the grantee and school districts to manually group children into their households before issuing benefits took extra time and effort.

- **Issue benefit reminders.** Parents/caregivers provided contact information when they filled out the online application. This allowed the grantee to send texts, emails, and robocalls to remind families of benefit start dates, end dates, and usage.

8.5 Perspectives on Permanent Authorization

The three grantees were at different stages of project implementation. The Cherokee Nation's project was restarting its longstanding project. The Chickasaw Nation's project was a self-described "well-oiled machine," and operated consistently for years. ITCA's project completed its third grant year and successfully expanded in each of the three years. It increased the number of children in its service area and increased participation and exhaustion. All three grantees welcomed permanent authorization of the Summer EBT project.

Permanent authorization allows for the kind of stability required to plan for long-term administration and design innovative approaches to implementation. Grantee staff identified several initiatives planned for the future of Summer EBT:

- The Cherokee Nation plans to maintain all 14 counties in its Tribal service area.
- Two grantees intend to allow more flexibility in using benefits. The Chickasaw Nation successfully piloted a process by which participants can redeem CVV benefits for fruits and vegetables at farmer's markets, and the Cherokee Nation intends to allow for online ordering of groceries in summer 2023.
- The Chickasaw Nation will pursue a Memorandum of Understanding with the Oklahoma Department of Education to allow for more efficient identification of and outreach to eligible households.

By all measures the 2021- 2022 cohort of Summer EBT projects were successful. Highlighting this fact, together, they issued more than \$8 million in nutrition assistance to households in need. Project partners and participants generally found the project easy to navigate, and stakeholders perceived the project as a crucial source of support. As a testament to the overall success, Summer EBT was permanently authorized in December 2022.



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Appendix A. Research Questions

Objective 1. Document Implementation Processes, Costs, Challenges, and Successes of 2019-2022 Grantee Projects

RQ1. What processes and criteria did grantees use in identifying and prioritizing the communities and populations that were served? What impact, if any, did Summer EBT have on other Federal, State, or local options for nutrition assistance provided in these service areas during the summer?

RQ2. What areas and/or populations would the grantee choose to serve if Summer EBT was a permanently authorized program? Why would these areas be selected? How could Summer EBT be targeted to reduce redundancy with other Federal, State, or local options for nutrition assistance during the summer?

RQ3. What resources are required to implement a statewide (or smaller area) Summer EBT project (e.g., data/ information, technology infrastructure, personnel, partnerships)? What were the challenges and successes with leveraging existing resources, or developing or obtaining new resources? How would these resources be used differently and what additional resources would be needed to operate Summer EBT efficiently if it was a permanently authorized program?

RQ4. What were the agencies involved in implementing or operating the Summer EBT project? What were the challenges and successes in coordinating these agencies? What other partners participated and what was the extent of their involvement? How would these agencies/partners operate differently and what additional resources would be needed to operate Summer EBT efficiently if it was a permanently authorized program?

RQ5. Describe the systems and processes used to identify eligible children and deliver EBT benefits. How would these resources be used differently and what additional resources would be needed to operate Summer EBT efficiently if it was a permanently authorized program?

RQ6. Identify areas of risk that could result in benefit issuance errors (i.e., food benefits delivered to and/or redeemed by ineligible individuals, or food benefits not delivered to eligible individuals). Describe any processes grantees put in place to prevent or detect benefit issuance errors. If possible, describe any actual instances of benefit issuance errors. What were the challenges related to preventing errors in Summer EBT and what recommendations do grantees have for how systems and processes could be improved to prevent error?

RQ7. What challenges did grantees encounter providing benefits to populations that are difficult to serve through traditional summer meals programs and/or Summer EBT including challenges related to children living in rural areas and those who attend CEP schools?

RQ8. Were there differences in terms of community access to other types of nutrition assistance for children (Federal, non-Federal, private, etc.) between urban and rural service areas, and between service areas that are and are not area-eligible for open summer meal sites?

RQ9. If delays in Summer EBT implementation occurred, what were the main causes of those delays and how were they addressed?

RQ10. What additional challenges did grantees encounter in implementing and operating a Summer EBT project and how did they address them? Were the challenges related to building a new program/operating a demonstration project, and would they still pose problems if Summer EBT was permanently authorized? What challenges are anticipated if Summer EBT was a permanently authorized program?

RQ11. What were the costs of statewide implementation and administration? How did the costs compare to what the grantee had proposed/budgeted? What are the fixed costs of administering a Summer EBT operation? What are the variable costs of administering a Summer EBT operation? How much does it cost to operate Summer EBT in rural areas as compared to urban areas? Were there any unexpected costs and what were the nature of these costs? How would cost structures change if Summer EBT was a permanently authorized program? What would be the most cost effective way to administer Summer EBT if it was a permanently authorized program?

RQ12. How would grantees propose to structure their projects if they operated on a larger scale (if not already? statewide) and on a permanent/continuous basis? What new systems/resources would they need? What agency would be responsible for program administration, what agencies/institutions would be partners, and what would their relationships/roles be?

Objective 2. Describe Household and Retailer Experiences with Summer EBT during a Three-Year Period (summers 2019-2021 or summers 2020-2022)

RQ1. From whom did families receive information about Summer EBT (e.g., schools, community groups, SNAP/WIC agency)? From whom would they like to receive Summer EBT information? What are the different types of information that they received? Do parents/caregivers receive sufficient information in advance to help them determine how to receive benefits? If not, what additional information is needed and what are the best ways and most convenient times to receive this information?

RQ2. What is the perception of Summer EBT among participating families? To what extent is it viewed as a critical source of nutrition assistance? Is it perceived as linked to participation in school meal programs (as opposed to being an additional SNAP/WIC benefit)?

RQ3. Are participating children receiving summer meals through SFSP? Are they participating in other food assistance programs? Why or why not?

RQ4. Who makes the decision for children to participate in the Summer EBT program? What deters children and their families from participating (either opting out entirely or not using some or all benefits)? Some examples may include but are not limited to: amount of benefits, stigma, difficulty of use, access to retailers.

RQ5. How frequently are participants using benefits? Does their participation fluctuate over the summer? Are participants exhausting their benefits every month? Why or why not? What are the most common reasons cited by parents/caregivers for how frequently and how much of their benefits they use? What could improve their benefit use; what are the barriers and facilitators for their participation? How does benefit use compare across 3 years? How satisfied were participants with the contents of the food package, if applicable?

RQ6. What is the parents/caregivers' overall satisfaction with the program? How could the program be improved? Were they able to use the benefits to obtain the foods they wanted their child to eat? If not, why? Would parents/caregivers recommend Summer EBT to other families currently not in the program?

RQ7. Do parents/caregivers plan for their child to participate in Summer EBT next summer? What are the key reasons for deciding to participate or not to participate next summer?

RQ8. Did the participants partake in training or nutrition education, or utilize technical assistance, if it was available? If not, what were the reason(s) for not participating? Did they experience any issues or challenges while using these services?

RQ9. What customer service supports did participants access? What were their views of those supports? Were the supports effective? What customer service supports would they like provided to them?

RQ10. What factors were associated with parent/caregiver satisfaction with Summer EBT?

RQ11. Did the retailers experience any issues or challenges in adapting their systems for Summer EBT cards? If so, how did the retailers address the issues?

RQ12. Did retailers become WIC or SNAP authorized, or change their inventories or other practices in response to Summer EBT? Did this vary by location (e.g., stores in rural, Tribal, or small localities)? Did retailers train their staff to accept Summer EBT benefits?

RQ13. How did the retailers share information with participants? Did they require assistance? If so, what kind of assistance did they provide and how frequently?

RQ14. Were there training, technical assistance or other forms of guidance provided by the State to retailers? What types of information/assistance were more effective?

RQ15. What is the retailers' overall satisfaction with the program? What did they like about the program? How could the program be improved?

RQ16. What factors were associated with retailer satisfaction with Summer EBT?

Objective 3. Describe Household Benefit Use in 2019-2022

RQ1. How do the participants use their benefits? What are the respective benefit participation, redemption, and exhaustion rates, overall and by grantee and service areas (if applicable)? Are there trends in when participants redeem their benefits (e.g., beginning of the benefit period, end of the benefit period, end of the summer)?

RQ2. What differences, if any, are observed in benefit use among participants in rural service areas versus urban service areas? In particular, what differences, if any, are observed by access to retailers, benefit amount, and Food Package vs. Debit Card model?

RQ3. What are the sizes and types of stores at which the benefits are used across all areas (for example, were benefits used at rural, suburban, urban stores)? Are participants redeeming benefits in their own communities (i.e., near their homes)?

RQ4. In Food Package service areas, what foods are most purchased by participants with their benefits? How do redemptions vary by food category? For grantees that customized their food packages, how did they determine which foods to offer, how was feedback solicited from participants, and how was the package adjusted to reflect benefit usage and participant feedback?

RQ5. Do rates of participation, redemption, and benefit exhaustion vary by family size, service areas, and Food Package vs. Debit Card model?

RQ6. How does the benefit use (participation, redemption, and exhaustion) compare annually across 2020 through 2022? Does benefit use increase if a household participated in a previous summer? Is Summer EBT benefit use increased if a household previously participated or currently participates in SNAP or WIC? What other factors impact benefit use (e.g., use of hybrid cards, quality of customer service supports, methods of obtaining consent, integration of stakeholders at the local level including schools)?

RQ7. What factors are associated with full (or near full) redemption of benefits?

Appendix B. Data Sources by Resource Question Matrix

Exhibit B-1. Qualitative Data Sources, by Research Question and Objective

Study objective	Data source			
	Semi-structured grantee/ School Food Authority interviews	Semi-structured retailer interviews	Parent/ caregiver focus groups	Cost data forms
Objective 1. Document Implementation Processes, Costs, Challenges, and Successes of 2019-2022 Grantee Projects	RQs 1-12		RQ8	RQ11
Objective 2. Describe Household and Retailer Experiences with Summer EBT during a Three-Year Period (summers 2019-2021 or summers 2020-2022)		RQs 11-16	RQs 1-10, 13	
Objective 3. Describe Household Benefit Use in 2019-2022	RQs 6,7*		RQs 6,7*	

* A sub-question from RQ6 and RQ7 are not included in the data collection and analysis under the Benefit Use Study; they are instead included under the Process Study.

Exhibit B-2. Quantitative Data Sources, by RQ and Objective

Study objective	Data source			
	EBT files	Household files	Retailer files	Coded interviews & focus groups
Objective 3. Describe Household Benefit Use in 2019-2022	RQs 1-6	RQs 1-3, 5-6	RQs 2-3	RQs 4, 6-7*

* A sub-question from Objective 3, RQ6 and RQ7 are not included in the proposed data collection and analysis under the Benefit Use Study; they are instead included under the Process Study as shown in Exhibit B-1.

Appendix C. Resource Appendix

The resources below were created to be adaptable for any Summer EBT program's use. A detailed description for each of the anonymized resources may be found on the Summer EBT Digital Report page: <https://fns-summerebt.com/>

Username:

Sebtc2018

Password:

ZxcAsd123

- [Generic Facebook Post Text](#)
- [Generic Summer EBT FAQ \(English\)](#)
- [Generic Summer EBT FAQ \(Spanish\)](#)
- [Generic Parent Flyer \(English\)](#)
- [Generic Parent Flyer \(Spanish\)](#)
- [Generic Memo. of Understanding](#)
- [Generic School Letter to Parents 1](#)
- [Generic School Letter to Parents 2](#)
- [Generic Press Release](#)
- [Generic Program Overview](#)
- [Generic PSA Announcement](#)
- [Generic Retailer Letter](#)
- [Generic Summer EBT Application \(English\)](#)
- [Generic Summer EBT Application \(Spanish\)](#)
- [Generic Text Messages](#)
- [Generic Twitter Post Text](#)
- [Generic Website Text](#)