

# The Case for and Challenges of Delivering In-Kind Nutrition Assistance to Children

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# The Case for and Challenges of Delivering In-Kind Nutrition Assistance to Children

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## Introduction

Sufficient nutrition in childhood sets the stage for a healthy life. This essay makes the case that in-kind nutrition benefits support a healthy and hunger-free childhood, and that those benefits complement policies that provide cash transfers to families with children. The federal government invests billions of dollars each year to support child nutrition through prepared meals, vouchers for groceries, and via commodities like milk. Yet, gaps in child nutrition program coverage and implementation continue to pose challenges for eliminating childhood hunger. Too many eligible children do not receive their nutrition assistance benefits.

We argue that federal coordination with and support for states on access and delivery is critical to ensuring that nutrition assistance reaches the children these programs are intended to serve. We acknowledge that it is difficult to administer these programs, and we highlight that many of these difficulties result in programmatic features that create barriers to participation.

An illustrative example of these challenges was seen in the implementation of the Pandemic Electronic Benefit Transfer program (Pandemic EBT), a new program that was implemented during the COVID-19 pandemic that used electronic grocery vouchers to compensate families for the loss of school meals. We discuss the lessons learned from Pandemic EBT that could inform the implementation of another new program that has the potential to close the consequential summer gap in the child nutrition program patchwork: Summer EBT.

## What Is the Case for In-Kind Benefits?

Several programs, including the Supplemental Nutrition Assistance Program (SNAP; formerly the Food Stamp Program) and Pandemic EBT payments, work the same as vouchers. Families use resources loaded onto EBT cards to purchase eligible foods at participating retailers, such as supermarkets and farmers' markets. Both programs are designed to supplement the resources that a family has available to purchase food; between in-kind nutrition benefits like SNAP and Pandemic EBT and their other cash income, a family should be able to afford to buy a sufficient, healthy diet.

Receipt of food voucher benefits like these may shift a household's food spending toward at-home food preparation. In general, SNAP and Pandemic EBT benefits can be spent only to purchase food intended for preparation and consumption at home. Although spending on food away from home has grown steadily as a share of food spending and, pre-pandemic comprised more than half of spending across all households, the low-income families who are targeted by

these benefits programs spend less of their food budgets on food prepared away from home than higher-income households (Cho, Todd, and Saksena 2018).

By increasing resources available to purchase food, grocery vouchers increase food spending. There is some debate about the extent to which grocery vouchers differ from cash in terms of their impact on food spending. Some researchers find that some families are much more likely to buy food with an additional dollar of grocery vouchers than they would with that same dollar in cash (Hastings and Shapiro 2018; Tuttle 2016), while others conclude that families are only slightly more likely to buy food with grocery vouchers than with cash (Fraker, Martini, and Ohls 1995; Hoynes and Schanzenbach 2009). Because grocery vouchers cannot legally be used to purchase items other than food, provision of benefits in this manner in effect directs family spending to food items and provides a floor for families' grocery spending. Restricting EBT benefits to the purchase of eligible foods therefore logically enhances protection against hunger among family members when compared to an equivalent cash amount.

The other major way that in-kind nutrition assistance is delivered is through prepared meals. From a policy perspective, the choice between assistance through prepared meals versus voucher benefits (or cash) should be informed by the context of the consumption it is intended to support.

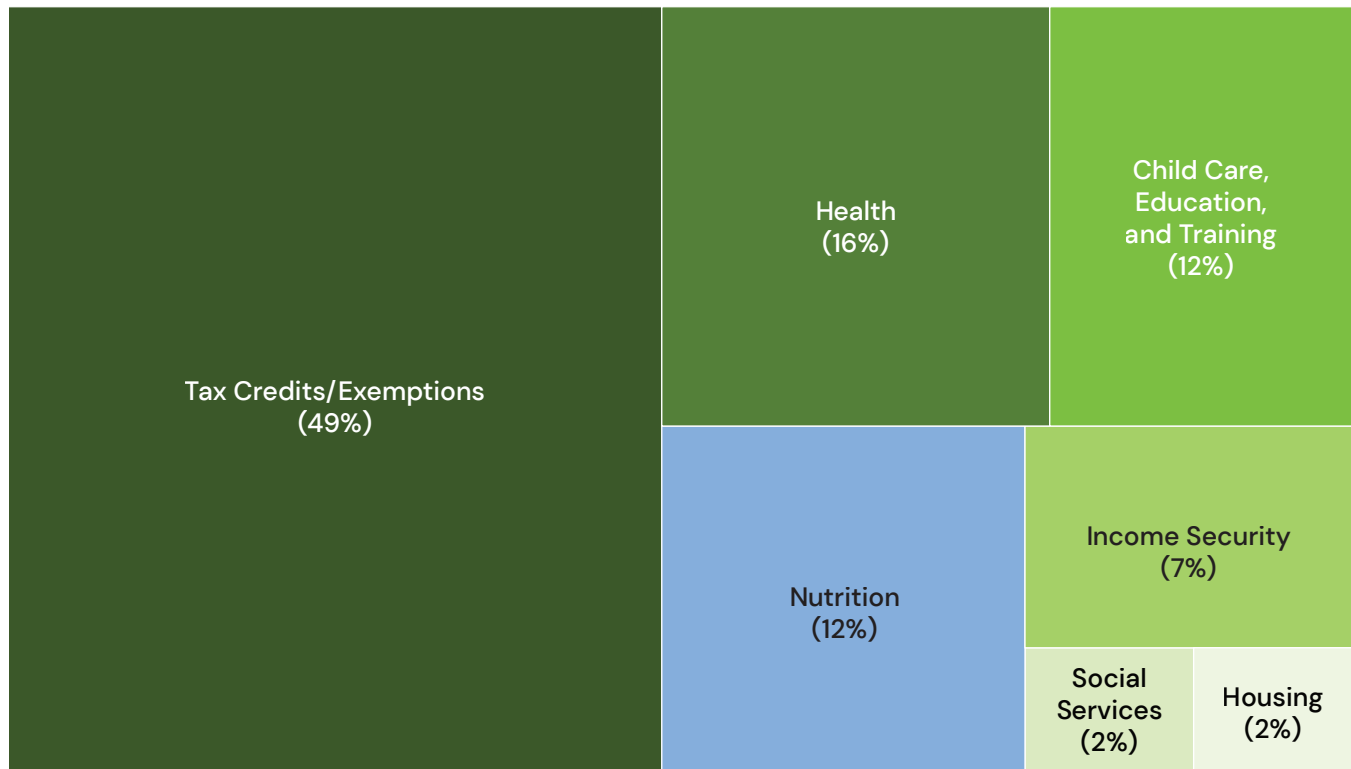
Take the case of school breakfasts and lunches. Sometimes called the "frontline of defense against child hunger," school meals serve a special role in providing adequate, high-quality nutrition to children. Simply put, since school children are already in a congregate setting at lunch time (and, in many cases, at breakfast time), it is efficient to feed them communally. After-school snacks and other food supports can also be efficiently distributed to the targeted population, because children are already together at a common location.

By this same logic, vouchers (i.e. benefits delivered via an EBT card) are more efficient than prepared meals when children are eating a meal at home, as is the case for SNAP and Pandemic EBT. In-kind nutrition assistance in the form of EBT is meant to increase the resources a household spends on food and to shift participating households' food spending toward purchases of food to be prepared and consumed at home. Families are already grocery shopping, and generally can combine purchases both from benefits and from their other cash resources during the same shopping trip.

What does the efficient provision of nutrition assistance in the summer look like? The answer is surely context specific. When children are already in congregate settings such as summer enrichment programs and camps, it is often better to provide prepared meals. But if children would otherwise have to make a special trip to a feeding center to obtain a meal, prevailing evidence shows that nutrition assistance in the form of EBT

FIGURE 1

## Distribution of Federal Spending on Children, 2021



Source: Lou et al. 2022



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for families to purchase food to be prepared at home would expand coverage and reduce food insecurity.

## How Does the Federal Government Provide Nutrition Assistance to Children?

In 2021 the federal government spent about \$834 billion directly on children (Lou et al. 2022). Figure 1 shows the distribution of federal resources that benefit children by category. While almost half (49 percent) of child-centered program spending is from tax credits and exemptions, the federal government spends almost as much on child nutrition (12 percent; \$104 billion) as it does on child health (16 percent; \$132 billion). This calculation includes federal resources to nutrition programs targeted only to children as well as the proportion of SNAP that directly benefits children.

The two categories of spending to children that saw the largest increase in investment from pre-pandemic to the pandemic period were tax credits and

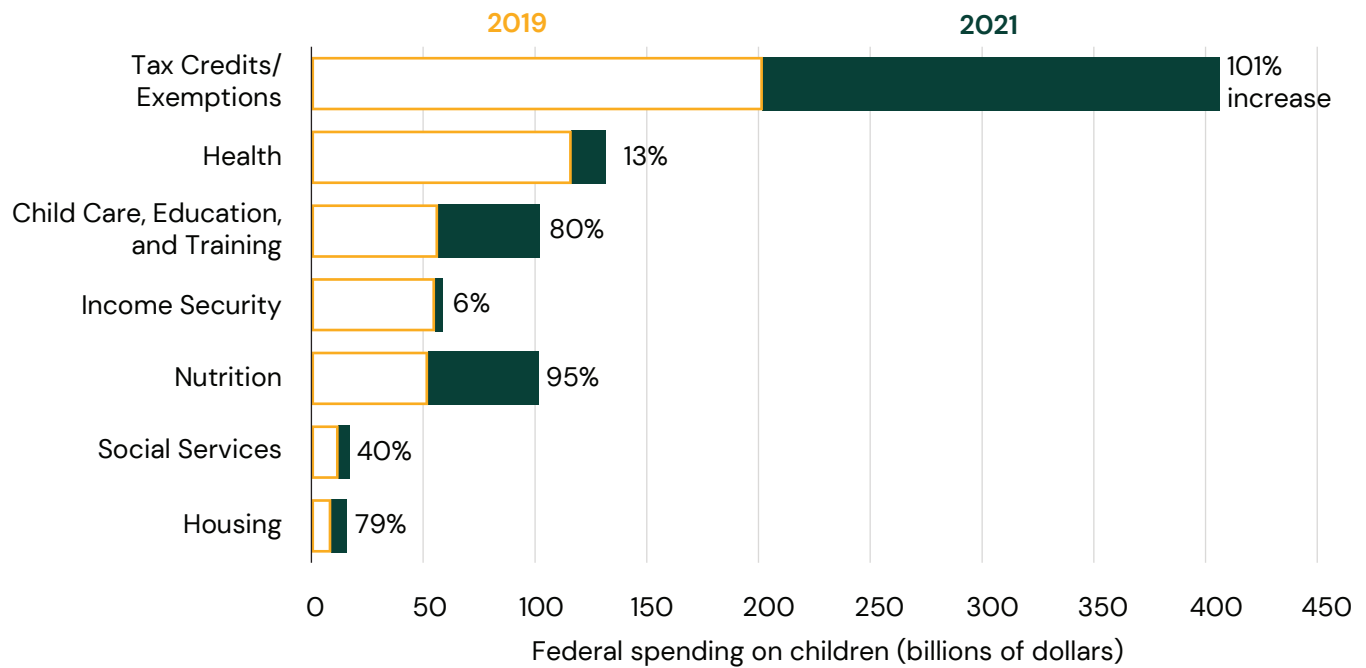
exemptions, including the enhanced Child Tax Credit (CTC), and, perhaps surprisingly, nutrition assistance. Figure 2 shows that federal spending increased across program types between 2019 and 2021. Many of these increases were temporary and have already sunset, notably the large increase in tax credits from making the CTC more comprehensive and generous in 2021.

Spending on nutrition for children was 95 percent (\$101.7 billion) higher in 2021 than it was in 2019, largely reflecting COVID-related fiscal support for nutrition. These changes include increasing benefits in SNAP and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), providing universal free school meals, and introducing Pandemic EBT payments for times when children are not at school.

Again, many of these increases were temporary and have already expired, but it is notable that Congress nearly doubled its investment in nutrition assistance to children as part of COVID-related fiscal support and due to the increased spending from automatic stabilizers that naturally occurs when the economy contracts.

FIGURE 2

## Change in Federal Spending on Children, 2019–21



Source: Lou et al. 2022

Note: All values are in 2021 dollars.



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### Different Types of Nutrition Assistance Programs

Nutrition assistance to children is provided in a patchwork system. Eligibility for each program varies by the *age* of recipients, *when* benefits are available during the year, *how* benefits are provided, and the *characteristics* of the family or place the child lives. Different programs provide diverse types of in-kind benefits, such as prepared meals, vouchers to purchase food, vouchers to receive certain food items, or commodities like milk.

This system results in coverage gaps when programs fail to cover eligible children along any of these dimensions, and when families do not or cannot access all the programs for which they are eligible.

Table 1 summarizes the key nutrition assistance programs by these features: age of eligible participants, eligibility determination, time (i.e., when benefits are available during the year), and type. Some programs, like the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are available (primarily) to low-income school-aged children whereas other programs such as WIC are only available only to younger children and, at times, their mothers. Sometimes eligibility is determined by other

factors; for example, schools and districts in which a large share of students are income-eligible for free meals can provide free meals to all students (including those with higher-incomes) through the Community Eligibility Provision (CEP). While some programs are available year-round, NSLP, SBP, and the summer feeding programs are only available for part of the year. Finally, programs differ in how benefits are provided to recipients. The school meals programs and similar programs offered during the summer and through child-care settings provide children with a prepared meal, whereas programs such as WIC, SNAP, Pandemic EBT, and Summer EBT provide families with a voucher that they can use at approved retailers.

There is variation across programs in the number of participants and in the share of the eligible population that in fact participates in (takes up) the program; there is also variation, as Table 1 shows, in the annual cost of the program. There can also be variation in take-up among eligible populations within a program.

Figure 3 shows how participation in WIC changes with a child's age. From infancy to age four, a similar share of all children (about 45 percent) is eligible to participate in WIC. Almost every eligible infant (98 percent) participates in WIC, but at age one participation drops to 65 percent of those eligible. By age

**TABLE 1**  
**Characteristics of Child Nutrition Programs**

Program	Age	Eligibility Determination	Time	Type	Billions of Dollars, 2019	Billions of Dollars, 2021
Supplemental Nutrition Assistance Program (SNAP)	No restrictions	Based on household income	Year-round	Voucher for groceries	60.4	113.8
Pandemic EBT	School-age children; in some states, preschool-age children	Based on eligibility for free or reduced-price school meals	April 2020–current	Voucher for groceries	0	28.4
Summer Food Service Program (SFSP)/ Seamless Summer Option (SSO)	School-age children	Determined by program operator	Summer	Prepared	0.5	10.7
National School Lunch Program (NSLP)	School-age children	Based on family income, or if child is attending a school with a school-wide option	School year	Prepared	14.2	9.3
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	Pregnant and postpartum women, children aged 0–5	Based on household income and child's age	Year-round	Item voucher; fruits and vegetable voucher	5.3	5.0
Child and Adult Care Food Program (CACFP)	Children in child day-care settings	Based on child-care center and adult day-care center	Varies	Prepared	3.7	3.8
School Breakfast Program (SBP)	School-age children	Based on family income, or if child is attending a school with a school-wide option	School year	Prepared	3.3	3.1
Special Milk Program (SMP)	Children in child day-care settings and schools that do not offer NSLP/SBP	Based on school and child-care center	Varies	Commodity	0.007	0.003
Fresh Fruit and Vegetable Program (FFVP)	Elementary schools	Based on elementary school's eligibility	Year-round	Commodity	0.175	0.183
Summer EBT	School-age children	Based on eligibility for free or reduced-price school meals	Summer	Voucher for groceries	NA	NA



four, only a quarter of eligible children participate. In a similar vein, eligible high school students are less likely to consume a free school meal than are younger students (Schirm and Kirkendall 2010).

### How Are Federal Nutrition Assistance Programs Administered?

Just as participants view programs differently based on those programs' age and eligibility requirements, time that benefits are available, and the type of in-kind benefit the program offers, administrators (the states) also view programs differently. Although the US Department of Agriculture (USDA) sets broad guidelines

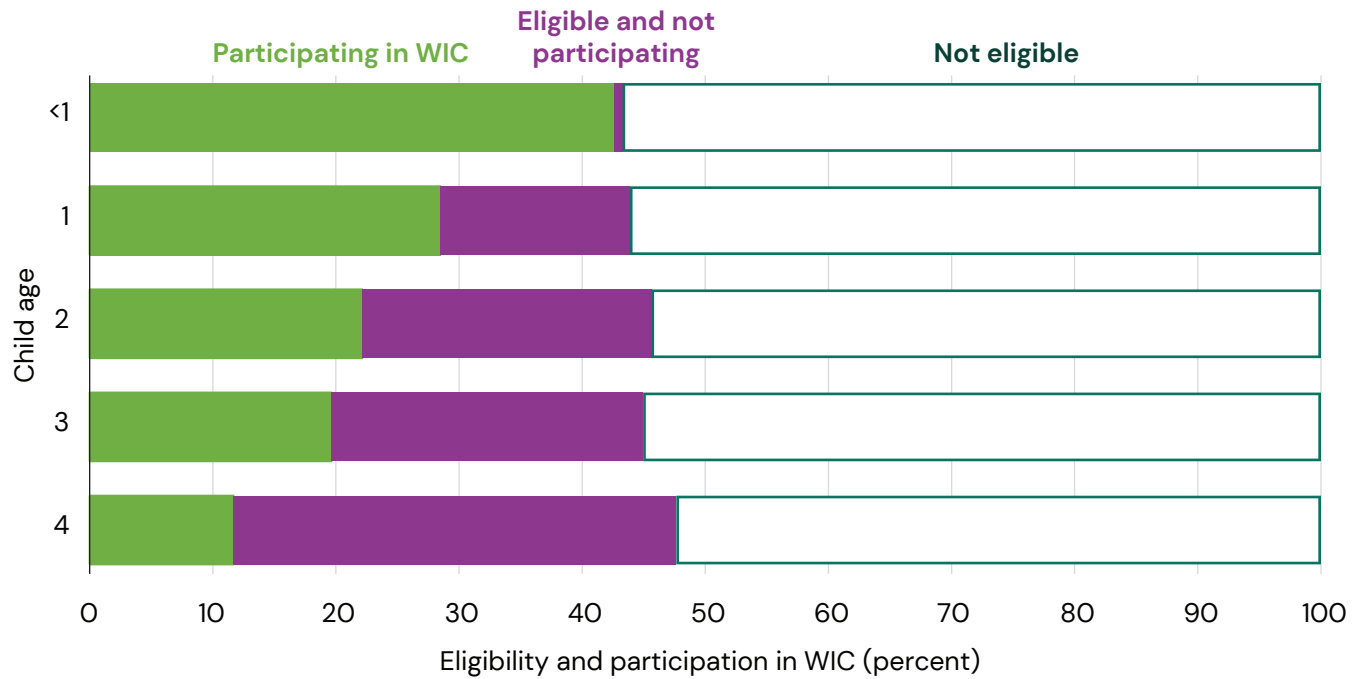
and reimbursement rates for each program listed in Table 1, there is wide variation across states in implementation strategies as well as in take-up rates among eligible populations.

Each of the child nutrition programs is federally subsidized and administered by USDA via the associated state agencies. This is where the commonality ends: child nutrition programs fundamentally differ in how states implement them. There are differences in which agency or agencies implement a program, in the amount of revenue the states receive from the federal government to administer the program, what entities the state works with to implement the program, how the state determines eligibility for the program, how



FIGURE 3

### Eligibility and Participation in WIC by Age, 2019



Source: USDA n.d.a.



the state engages in oversight, and how the program is financed.

For example, although USDA establishes income eligibility requirements and benefit amounts for SNAP, states have flexibility in how they identify and screen potentially eligible individuals and how states receive funding to cover these administrative costs. Forty-three states and the District of Columbia use broad-based categorical eligibility (BBCE) to enroll clients in SNAP who receive services funded through Temporary Assistance for Needy Families (TANF), and 48 states and the District of Columbia have online applications (Center on Budget and Policy Priorities 2022). Provisions that make it easier for individuals to enroll (e.g., BBCE and replacing in-person interviews with phone and online applications), as well as strategies that increase retention conditional on eligibility (e.g., extended certification lengths), have increased take-up rates among the eligible population (Ganong and Liebman 2018). State policy decisions predict SNAP take-up rates (Finkelstein and Notowidigdo 2019; Ribar, Edelhoch, and Liu 2008; Schanzenbach 2019) and take-up rates vary dramatically across states. For example, an estimated 82 percent of eligible individuals received SNAP in 2019 nationwide, ranging from a low of 56 percent in Wyoming to an estimated 100 percent in states like Delaware, Illinois, Oregon, and Washington, among other states (USDA 2022).

A meal provided through the school meals program receives a federal reimbursement depending on the income category of the student (free, reduced-price, or paid-lunch eligible), although states and localities can provide an additional subsidy. The federal government requires all states to establish systems to automatically enroll, or directly certify, children whose families receive SNAP (and optionally other income assistance programs) for free school meals by the 2008–9 school year, but states differ in their strategies to enroll students who do not participate in these programs. Some districts only send out paper forms at the beginning of the school year, whereas others provide online application portals.

Another strategy for issuing free school meals is for districts and schools to participate in schoolwide, or universal, free meals programs, such as the Community Eligibility Provision (CEP). These programs allow schools in which a large share of students receive SNAP or another form of income assistance to offer free school meals to all students without families needing to complete additional paperwork. The federal government then reimburses schools based on the share of students directly certified or approved for free meals in a base year.

Participation in schoolwide free meals programs again varies across states: in 2019, prior to the pandemic, all eligible school districts in North Dakota had

implemented CEP, whereas fewer than 17 percent of eligible school districts participated in Nebraska (Food Research & Action Center [FRAC] 2020). More recently, California, Colorado, and Maine implemented school-wide free meals programs across the entire state beginning in the 2022–23 school year, and other states, including Connecticut and Massachusetts, temporarily expanded state-led universal free meal programs.

State and local funding streams also differ. In contrast to grocery voucher programs such as SNAP and WIC that fund benefits completely with federal dollars, some states provide additional state or local revenue to schools and districts that are operating the school meals program. For example, some states provide state revenue to eliminate the reduced-price fee, others provide a flat per-meal subsidy, and still others provide a subsidy that varies with the school poverty rate and meal type (i.e., whether free, reduced-price, or paid; FRAC 2020).

There has been increased interest in and awareness of administrative burden faced by those who seek to participate in benefits programs, which includes the learning, psychological, and compliance costs associated with participants' interactions with the government (Herd and Moynihan, 2019). Some of the differences in participation across programs, groups, and states may reflect differences in administrative burdens, or differences in sensitivity to the administrative burden. Recent studies indicate that a substantial share of those dropping out of SNAP when it is time to recertify for benefits remain eligible for benefits, suggesting many exits are due to administrative burden on participants (Gray 2019; Homonoff and Somerville 2021).

## How Is Nutrition Assistance Provided in the Summer?

Food insufficiency and insecurity among children participating in the NSLP tends to rise in the summer (Huang, Barnidge, and Kim 2015; Nord and Romig 2007), in part because families struggle to absorb the loss of the value of school meals (Almada and McCarthy 2017). Prior to 2020, federal policy addressed the summer food gap for children by offering prepared meals through the Seamless Summer Option (SSO) and the Summer Food Service Program (SFSP). Historically, SFSP struggled to provide adequate coverage because many children do not have access to meals sites. In spring of 2018, only 43 percent of children (Bauer and Parsons 2020) lived in a Census tract with a meals site, and in the summer of 2018, only about one child for every seven who participated in school meals programs participated in the SFSP (FRAC 2019). While the share of children who live in a tract with a meals site had increased to 53 percent by 2020, access and

availability remain open issues (Bauer and Parsons 2020; Wilkerson, Khalfe, and Krey 2015).

To study a potential solution, Congress authorized USDA to conduct a randomized control trial for “Summer Electronic Benefits Transfer to Children.” In 2011 and 2012, USDA tested the effect of a \$60 per summer month benefit and found that Summer EBT reduced child food insecurity by a fifth and very low food security by one third (Collins et al. 2013). Summer EBT also improved nutrition: participating children consumed 30 percent more whole grains, 13 percent more fruits and vegetables, and 10 percent more dairy products. A subsequent trial that tested a lower per-month voucher, \$30, was about equally as effective at reducing very low food security as \$60 was, but was less effective on reducing food insecurity (Collins et al. 2014). Despite these positive effects, however, the program remained in pilot status until December 2022.

## Nutrition Assistance During COVID

There have been recent efforts to fill the gaps in the child nutrition assistance patchwork, especially during the COVID-19 pandemic.

Policies spurred during the COVID-19 pandemic met some of the challenges described above. COVID-era flexibility around enrollment and recertification made it easier for families to get on and stay on programs. SNAP Emergency Allotments and a congressionally authorized 15 percent increase in the American Rescue Plan to the SNAP maximum benefit increased purchasing power. When schools closed, congress authorized a new program, Pandemic EBT, to provide a grocery voucher to eligible families equivalent to the value of missed school meals. Congress also increased funding for existing child nutrition programs. For example, WIC received additional funding, and, for the 2020–2021 and 2021–22 school year, school meals were both universal and free. Prepared meals were available to more families and in more locations.

Some of these COVID-induced changes built on decades of progress. For example, the use of direct certification in school meals—required by USDA since the 2008–9 school year—automatically enrolls families who receive TANF or SNAP (and Medicaid in most states) into the school meal programs. In addition, since the introduction of CEP in the 2011–12 school year, the share of schools offering free school meals to all students, regardless of income or SNAP participation, has increased. State-level universal free meals programs—such as those in California, Colorado, and Maine—have further expanded access.

Other changes were more sudden. From 2020 through 2023, Congress authorized Pandemic EBT to make up for missed school meals while schools

remained closed due to COVID or during summer breaks. In general, states may apply to USDA to provide grocery vouchers to students who are eligible for free or reduced-price meals if schools are closed more than five consecutive days due to the pandemic or, for 2021–23, if it is summer.

Because states administer most non-tax-based social insurance programs, states were responsible for implementing some of the most challenging COVID policy responses. Under exceedingly difficult circumstances, states and their employees did heroic work across all the social insurance programs—including SNAP, Unemployment Insurance, and Medicaid—to provide support to families. Researchers, including the authors of this essay, have documented the challenges that the volume of need, the complexity of the programs, the substantial relaxation of regulations, the short staffing, and the sense of urgency posed to states both in existing programs and in new ones, such as Pandemic Unemployment Assistance (PUA) and Pandemic EBT (Edelberg, Furman, and Geithner 2022).

As part of the Families First Coronavirus Response Act that was passed in March 2020, Pandemic EBT was intended to provide nutrition assistance to families who had lost access to school breakfasts and lunches due to school closures. In its first iteration (and in each subsequent wave) states varied in how much time it took for them to develop a plan to implement Pandemic EBT, gain approval from USDA, begin disbursing benefits to households that were already participating in SNAP, and disbursing benefits to eligible non-SNAP households. Figure 4 shows the timing of the first Pandemic EBT benefits that were distributed to SNAP participating households by state for the 2019–20 school year. It took about a month for the first state to send benefits for schools that had been closed, and twenty weeks elapsed between when the first state (Michigan) and the last states (Alaska, Idaho, and Nevada) began Pandemic EBT disbursements.

As school closures continued into the 2020–21 school year, Congress reauthorized Pandemic EBT in October 2020; Congress then offered technical fixes in December 2020, but that was too late to allow states to have a chance to provide benefits at the onset of the 2020–21 school year. As Gupta et al. (2021) show, states implemented the 2020–21 school year Pandemic EBT starting at various times, to different populations, in different amounts, and on different schedules. As a result, school year 2020–21 benefit payments were delayed, and no state delivered them before January 2021. Yet, because of delays in distributing spring-2020 benefits, many families had only recently received benefits by fall 2020, reducing the gap in assistance. It is estimated that more than \$1 in every \$10 spent at retail grocery stores was from SNAP or Pandemic EBT in fall 2020 (Jones 2021).

In March 2021, the American Rescue Plan authorized Pandemic EBT during any school year or subsequent summer in which a national public health emergency is declared. As a result, Pandemic EBT began operating in the summer of 2021 and will operate through summer 2023. Yet, even several years into its implementation, difficulties and delays continued. Figure 5 shows the number of children who received Pandemic EBT by month. Throughout the life of the program, disbursements to eligible families for school-closure and summer Pandemic EBT benefits were not distributed in a timely manner, meaning that the time gap between when a child missed a school-provided meal through no fault of their own and when they received compensation in the form of Pandemic EBT was far too long. This inconsistency and unpredictability reduced the social insurance value of the program, but our evaluations show that the efforts and resources were worthwhile nonetheless.

Many of the challenges that arose with Pandemic EBT were inevitable with a new, temporary program—especially one that was introduced during a global pandemic. Nonetheless, the benefits reached a very broad swath of low-income children and reduced food hardship. Estimates from the pandemic show that grab-and-go meals reached more than a quarter of the eligible child population, whereas Pandemic EBT reached 89 percent (Kenney et al. 2022). Between April 2020 and October 2022, more than \$60 billion in money for groceries was distributed to families through Pandemic EBT—a substantial sum. Furthermore, our evaluations of the program find that, in the first and second waves of the program, Pandemic EBT caused substantial reductions in food hardship among low-income populations (Bauer et al. 2020; Bauer, Ruffini, and Schanzenbach 2021).

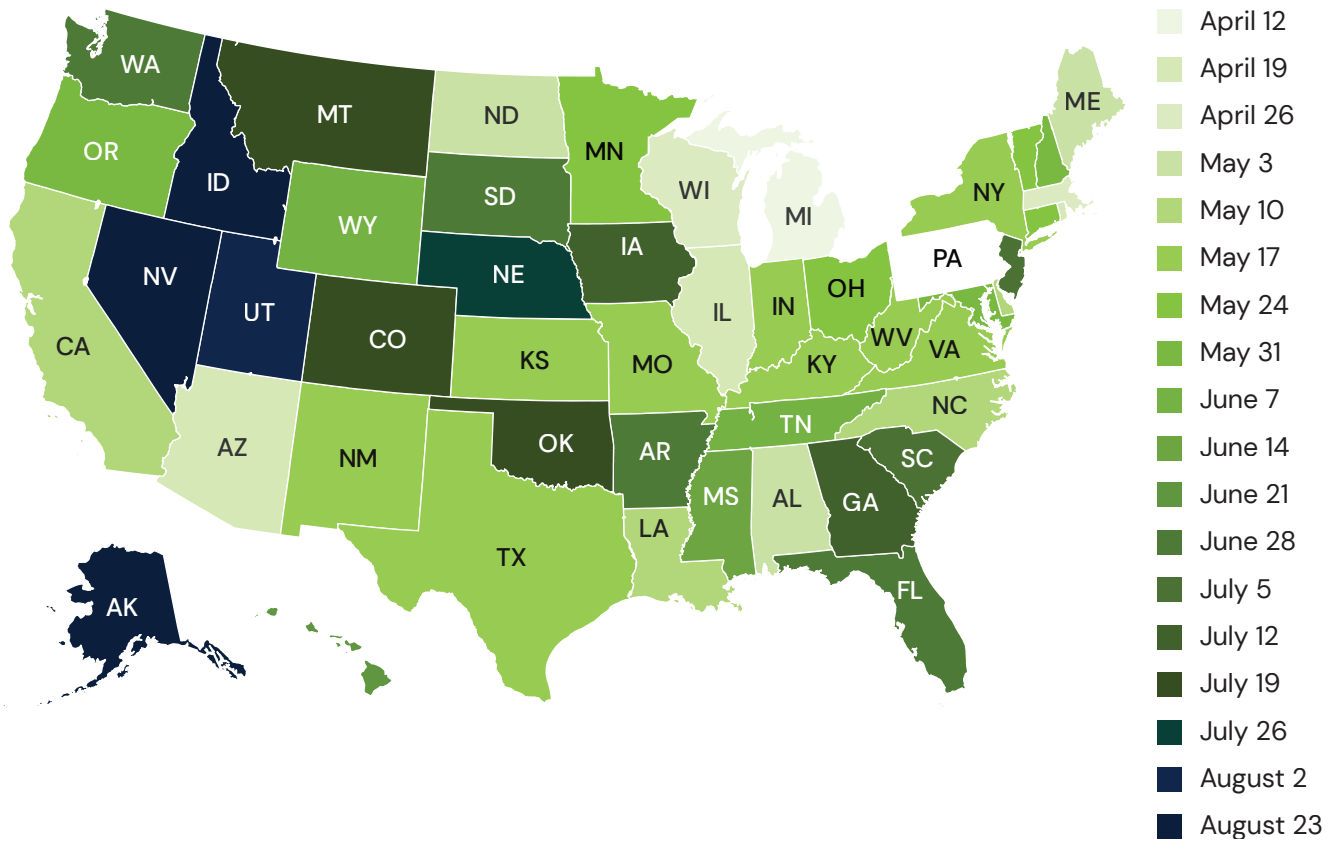
## Lessons from Pandemic EBT to Inform Summer EBT Implementation

In December 2022, Congress acted to fill an important gap between access to nutrition in the school year and access during summer months by permanently authorizing the Summer EBT program. Starting in 2024, Summer EBT will provide a \$40 voucher per child per month when school is not in session to purchase groceries at authorized retailers. In subsequent years, the \$40 base amount will be adjusted for inflation.

As states begin to implement Summer EBT, we describe some of the opportunities and potential pitfalls based on recent lessons from the Pandemic EBT program. The many similarities between the two programs provide the opportunity to apply the lessons learned from Pandemic EBT to Summer EBT. While the

FIGURE 4

## Variation in the Timing of Pandemic EBT First Disbursements, by Week



Source: Authors' correspondence and calculations.

Note: Weeks start on Sunday; a state is assigned to a first disbursement week based on the first day that P-EBT benefits were loaded onto at least some existing EBT cards.



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experience of starting Pandemic EBT was a trial by fire, the problems that states encountered provide actionable lessons to address as Summer EBT implementation begins.

By its very nature, a *permanent* authorization of Summer EBT inherently addresses some obstacles experienced with Pandemic EBT, especially predictability and consistency. In setting a predetermined voucher amount (\$40 per child per month) for a set period (summer months when schools are not in session), Summer EBT overcomes the difficult tracking requirements of measuring when and where schools were not in session that contributed to Pandemic EBT program complexity and delayed payments. The permanent nature of the new Summer EBT expansion also provides the opportunity to develop capacity, expertise, relationships, and data systems that will reduce the degree of difficulty at its onset and over time, thus lessening administrative costs and burdens.

However, there are other steps that are not foregone conclusions that policymakers at the federal, state, and local levels should undertake to realize the

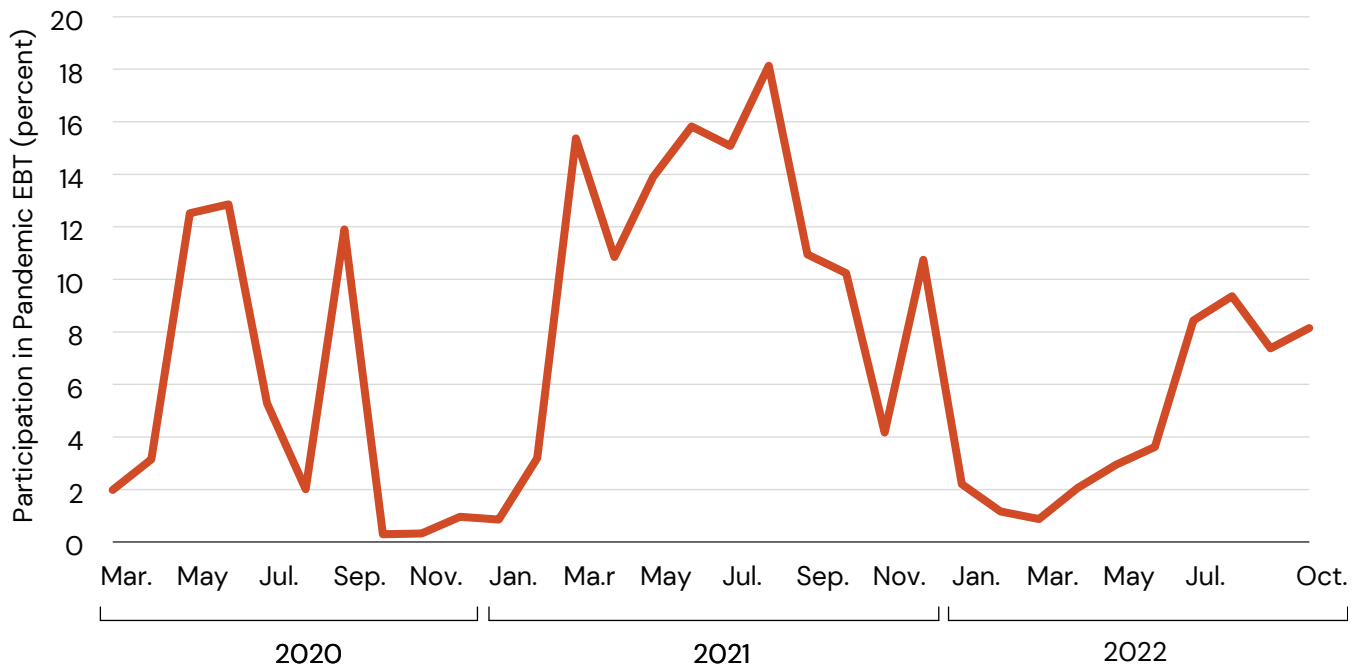
full potential of an EBT-based program when schools are closed:

- First, federal guidance, regulations, and engagement with states must be timely and responsive.
- Second, once they have been assured of that appropriate federal support, states must elect to participate in the program, provide dedicated staff needed to manage the program, and deliver benefits on time.
- Third, state agencies and staff need to address technical and technological challenges, particularly challenges associated with identifying and distributing benefits to all eligible students.

This is certainly not an exhaustive list of issues that guarantee a successful Summer EBT implementation. Indeed, other researchers have produced substantive and informative reports that attempt to comprehensively document the challenges with administering

FIGURE 5

## Number of Children Who Received Pandemic EBT Benefits, by Month, March 2020 to October 2022



Source: US Dept. of Agriculture (USDA), n.d.b.



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Pandemic EBT (Dean et al. 2020; FRAC 2022; Fraser et al. 2021; Waxman et al. 2021). However, in our view, these three issues represent the most substantial challenges that USDA and states faced with Pandemic EBT that are relevant for Summer EBT, and we discuss them next.

### Federal Support

Delays in congressional reauthorization of Pandemic EBT led to delays in initial federal guidance (and additional guidance as the program developed). Vague state plan application language, a frustrating iteration process, and weak technical assistance hampered each round of Pandemic EBT. Any speed bumps at the federal level necessarily delayed a state’s implementation timeline. For example, lack of clarity on application requirements resulted in multiple rounds of iteration between USDA and states. And, even then, the approval process of what would become a successful application could take weeks.

A survey of program administrators found that the federal funds (and the expected state match) were insufficient to cover the costs to run the program (FRAC 2022), though the federal government did eventually end up covering 100 percent of the costs. When states

apply to USDA for Summer EBT, they will have to provide an estimate of their administrative costs. Its authorizing language indicates that USDA will pay to state agencies and covered tribal organizations half of the cost of operating the program. While presumably there will be iteration between USDA and states on this line item, providing funding as a 50 percent match is responsive to states’ concerns regarding the cost of administration raised during the Pandemic EBT experience.

Going forward, there is an opportunity to ensure a timely disbursement of benefits. In its authorizing language, the federal government must issue Interim Final Regulations by December 2023 that includes best practices from the experience of Pandemic EBT and the summer EBT demonstration; establishes procedures to accurately identify and enroll eligible students; and outlines methods to streamline applications. Once the program begins, each year, states are required to submit an intent to participate by January 1 and an application to participate by February 15. The permanency and clear notice and application deadlines are a forcing mechanism for states. From March 2023, USDA and states have almost a year before Summer EBT 2024 applications will be due. This is more than enough time to stand up guidance and technical assistance, in a transparent manner, so that states can learn from each other and from the process.

## State Participation and Capacity

The Pandemic EBT experience highlights that it took time to learn how to divide the financial, administrative, and data work necessary for implementation between different agencies (FRAC 2022). The set-up varied across states. For example, the state department of social or human services (or the related agency) was the lead agency for Pandemic EBT in 43 states, but it was the state department of education that led the process in four other states. Other agencies, or a combination of agencies, led the program implementation in the remaining states. In most states, a combination of contractors and staff managed the program, though a small number of states used only contractors, and a few others used only staff.

We are concerned that some states may decline to participate in Summer EBT because of their experience with Pandemic EBT. Many actors were burned out from Pandemic EBT implementation. For example, almost every state and territory eventually submitted a plan and obtained approval for each Pandemic EBT wave, but the process was burdensome. Take summer 2022 as an example: by August 2022, when summer was effectively over, a third of the states had yet to have approved plans (Bauer et al. 2022). But eventually, all but 2 states did. It took extensive pressure, outreach, and cajoling from the USDA Secretary among others to nudge states to continue to participate in Pandemic EBT.

Pandemic EBT will end its authorization after summer 2023 and Summer EBT will begin in 2024; the existing summer site-based prepared meals programs—SSO and SFSP—will continue to operate. Summer EBT should be simpler to administer at the state and ground levels and achieve potentially better coverage alongside the coexisting summer meal programs. Although all are federally funded, Summer EBT will have greater reach than the SSO/SFSP program because it will serve every student who is eligible for free school meals, rather than requiring the student to be present at a given location at a particular time and day. The oversight necessary to monitor for waste, fraud, and abuse in Summer EBT would be akin to well-understood processes for SNAP.

However, there are still challenges that state and federal agencies must anticipate. Furthermore, there is a dearth of evidence on the most effective strategies for providing timely payments to families while maximizing take-up rates and minimizing administrative costs. These challenges underscore the need for ongoing research to improve service delivery and to assess and strengthen the program's effectiveness.

We do not support completely supplanting the summer meals programs with Summer EBT, but rather emphasize that their existence is not a reason to decline to participate in the new program. We reiterate

that, when children attend summer enrichment programs and camps, providing prepared meals through SFSP and SSO is more efficient. We therefore support SFSP's targeted continuation. Otherwise, Summer EBT would be more effective and efficient. This theory was borne out in the coverage and effect of Pandemic EBT compared to grab-and-go meals and would translate going forward. If states desire to provide nutrition assistance to as many children as possible in the summer months, then they should elect to participate in Summer EBT and the summer meal programs together.

## Technological and Technical Challenges

It is undeniable that Pandemic EBT was difficult to administer. Simplification of eligibility for Summer EBT should also reduce the need for communication between families and administering agencies, and hence should reduce communication burdens for families—as it has with school meals. States could resolve parents' biggest problem with Pandemic EBT by simplifying the program and issuing benefits automatically to as many of the eligible children to minimize the need to submit applications for Summer EBT (Cadenhead et al. 2022).

With Pandemic EBT, states struggled to identify students who were eligible (eligibility was determined by family income, direct certification, categorical eligibility, or their school's participation in a school-wide free meals program). States not only had to identify these students, but also had to collect and provide the information about the students to the implementing agency and contractors in a usable format, and issue EBT cards to the proper address. Tracking the number of families that received payments and determining payment amounts was also a challenge in many states, particularly in the 2021–22 school year when most schools were operating in-person for at least part of the year.

States took different approaches to find these students, in part based on their extant data system infrastructure. In many cases, efforts were very local (e.g., at the school level) and relied on the usual application for participation in the free meals program. Other states did not rely on a separate application but worked to link information between the departments of human services and education to identify eligible students' mailing addresses. In many cases, these data systems had never communicated with each other before, and data entry and compatibility challenges frustrated administrators and hampered implementation.

In Summer EBT's authorizing language, states are required to "automatically enroll each eligible child who is directly certified, is an identified student, or is otherwise determined by a school food authority to be eligible to receive free- or reduced-price meals in the

instructional year immediately preceding the summer or during the summer operational period in the program under this section, without further application from households (Consolidated Appropriations Act, 2023 [2022])." An application and verification process remain the means for other eligible children to participate.

If states struggle or fail to identify students who are eligible for free- or reduced-price meals to Summer EBT for automatic enrollment, as was the case with Pandemic EBT, then the program will move at cross purposes to recent reforms that aimed to simplify enrollment in the meals programs. There is, however, the opportunity to use the lessons learned and data systems developed during Pandemic EBT to collect and port student information across government entities, including eligibility and address. As the rules and regulations for Summer EBT work through the notice and comment process, flexibility for alternative means of EBT card delivery—for example, letting schools distribute Summer EBT cards at the end of the school year—could be a viable solution.

## Conclusion

The newly authorized Summer EBT program presents an important opportunity to fill one of the most substantial gaps for children in the existing nutritional assistance patchwork: the availability of nutrition support when schools are closed during summer months. As with any new program, there will be implementation challenges that federal and state policymakers must address to ensure a successful rollout. By extending out from the Pandemic EBT experience, the launch of Summer EBT could be thought of more as continuous improvement, by implementing applicable lessons learned.

To this end, the recent Pandemic EBT program experience offers lessons in best practices and illuminates challenges that can be avoided with adequate time, framing, technical assistance, and expertise. In fact, administrators in many states reported that, if they had been given sufficient time, it would have been easier to stand up Pandemic EBT (Waxman et al. 2021). If policymakers and administrators start now, there is enough time to anticipate and prepare for Summer EBT. We hope that, come 2024, children will have secure access to sufficient food for a healthy and hunger-free summer.

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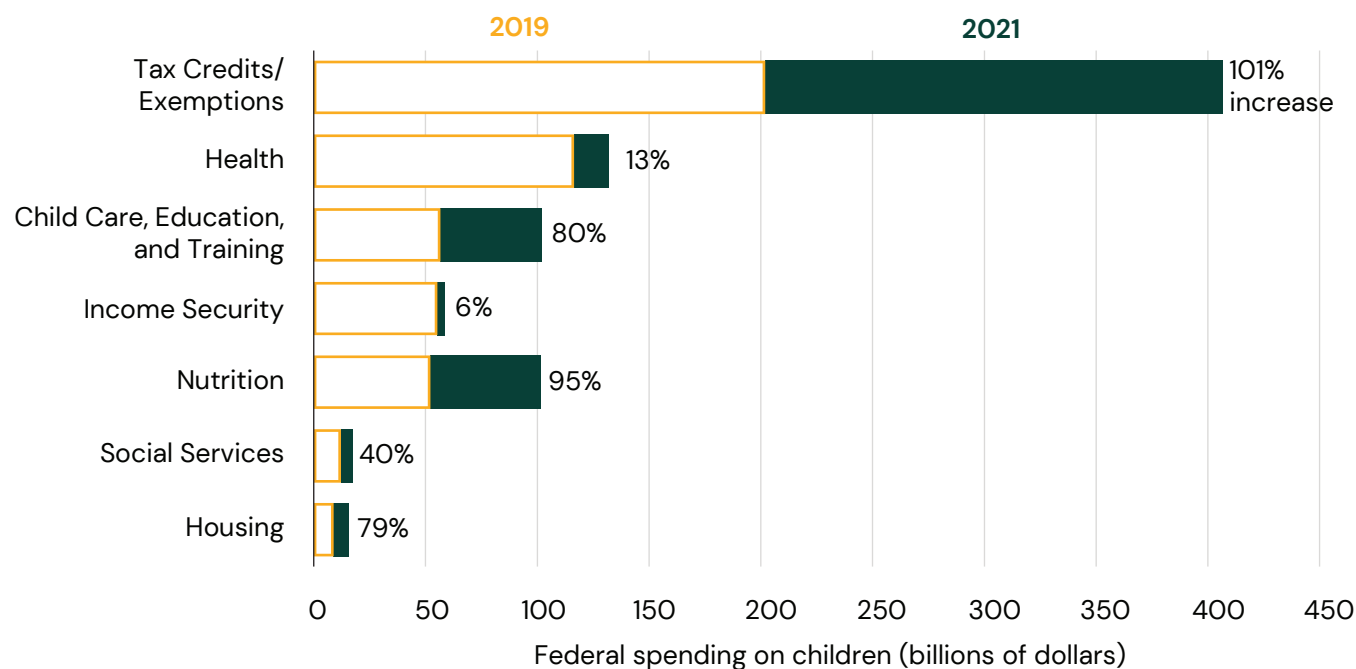
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Child food insecurity and child poverty in the U.S. are solvable problems. Yet, gaps in child nutrition program coverage and implementation continue to pose challenges for solving childhood hunger. This essay makes the case that in-kind nutrition benefits—both in the form of prepared meals and grocery vouchers—support a healthy and hunger-free childhood. The authors argue that federal coordination with and support for states on access and delivery is critical to ensuring that nutrition assistance reaches the children these programs are intended to serve. To illustrate the challenges with solving child hunger, the authors discuss the lessons learned from Pandemic EBT that could inform the implementation of another new program that has the potential to close the consequential summer gap in the child nutrition program patchwork: Summer EBT.

## Change in Federal Spending on Children, 2019–21



Source: Lou et al. 2022

Note: All values are in 2021 dollars.



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