



Regarding the State of Vermont's Implementation Plan for Summer-EBT

Testimony provided to the House Committee on Agriculture, Food Resiliency and Forestry

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Thank you for inviting me in to speak today, and for your attention to the Summer-EBT program. As an anti-hunger organization, it is heartening to see attention being paid to food security programs like Summer-EBT.

Since the state agencies that are accountable for administering this new federal program were not able to attend this hearing, let me start by briefly describing the Summer-EBT program.

Summer-EBT is a new, permanent Federal Nutrition Program that provides \$40 per eligible child in food benefits on an EBT (Electronic Benefits Transfer) card that can be used everywhere that 3SquaresVT (SNAP) is accepted, for each 4 weeks of summer vacation when school is not in session. Summer 2024 is the first opportunity states have to implement this new federal Summer-EBT program.

Eligible children are those who attend a school that uses the National School Lunch Program (NSLP) to provide meals during the school year, and whose families are income-eligible for free or reduced-price school meals.

Hunger Free Vermont is disappointed by the State Administration's decision not to participate in the new Summer EBT program in 2024. While there are barriers that do create challenges in implementation, we had been working for months to try and assist the Agency of Education and the Department for Children and Families at the Agency of Human Services in being able to start the program this summer, and are disappointed that our State couldn't get there. We have been assured that these agencies are committed to implementing Summer-EBT in 2025, and we are pleased to see that there are dedicated Summer-EBT implementation funds included in the just-released Governor's budget. And we acknowledge that during a time of cascading crises, that does not assure Vermont families with children who need help now.

I also want to highlight some of the very real challenges and barriers that exist for state agency staff when it comes to implementing this program, and what we can do today to ensure a strong rollout of this program in 2025:

- USDA took a very long time to issue their guidance on how states must implement the program, and the guidance is very complex and is going to put quite a burden on state agencies, schools, and--if not implemented with great care--on individual families.

- While the dollars to be passed along to families are fully funded by the federal government, 50% of the costs to administer the program must be covered by state governments.
- Additionally, the deadline for States to send a letter of intent to opt-into Summer EBT in 2024 was set by USDA as January 1, and no funds were appropriated last session to cover the state's portion of administrative costs, because no federal guidance had been provided to tell states what that administrative work would even entail.
- It turns out that USDA has chosen to make the administration of Summer-EBT extremely—and in our view, unnecessarily—complex. This includes intrusive application and income verification requirements that will most heavily impact the most vulnerable families, especially those who are refugees and immigrants, and those who do not speak or read English well. In order not to place these burdens on families, Vermont's state agencies need to carry out a lot of work to create new, easy to use systems, and to do so in multiple translations.
- The antiquated IT system at AHS cannot handle the data matching required for some categories of students under USDA's rules for the program, so the agency staff and school districts would essentially have to identify some eligible students by hand for 2024. (The plan is to build a new software program that can fulfill the federal data matching and verification requirements for Summer-EBT in time for summer 2025.)

Hunger Free Vermont participates in a national working group on Summer-EBT with anti-hunger advocates from most states, and so we know that these barriers are a big challenge for most states. Some states that have expressed their intent to implement Summer-EBT in 2024 are already expressing concerns that it might not actually be possible for them to pull it off.

Hunger Free Vermont and our state agencies have been working with our federal delegation to ask USDA to allow for certain waivers in 2024 that would help overcome some of the administrative/paperwork barriers that I referenced earlier. Some proposals that have been offered by the State to USDA include:

- Allowing states partial implementation options for summer 2024 including issuing summer EBT benefits to those households with children receiving SNAP, TANF and Medicaid
- Allowing states to submit summer 2024 plans which simplifying categorization for ages of children, for example, PreK through 18 rather than the compulsory education ages of 6-16
- Extending opt-in deadline for summer 2024 to March 1

So far, USDA has refused these proposals.

I would also like to take this opportunity to clarify the status of Summer Meal sites—the program that provides universal free summer meals for kids is operating as usual in summer of 2024. In fact, thanks to the way Act 64 was designed to implement Vermont's Universal School Meals Program, combined with the State's implementation of the direct certification of students for free and reduced-price school meals using Medicaid data this year, and USDA's lowering of the eligibility threshold for schools to participate in the Community Eligibility Provision, more than 80 additional towns in Vermont will be eligible to operate summer meal programs for the first time this year. Hunger Free Vermont and the Agency of Education are working hard to expand the number of universal free summer meal sites as much as possible for summer 2024.

The challenges with the Summer-EBT program are frustrating, and they highlight the ongoing barrier that has been in the way of leveraging federal funding for a wide range of programs that support hundreds of thousands of people in our state meeting our basic needs: the antiquated IT systems, especially at the Agency of Human Services. This has been a barrier to access for decades, and must become a top priority for both the administration and the legislature, if we do not want the situation we are facing with Summer-EBT to continue to play out again and again.

Thank you, and I am happy to answer any questions.