

Hi Ginny,

When we talk about this, I think it is important to start by saying we are planning to go ahead with this program for the Summer of 2025 because supplemental nutrition is so important for the well-being of Vermont's children. It is something we would have loved to do this year, but, unfortunately, given the timing and other challenges, we just can't. We are working together with the Agency of Education on the planning and infrastructure needed in the state to successfully administer this program and offer this important summer nutrition benefit for eligible children starting in the summer of 2025.

Here is why we could not responsibly stand it up and go ahead with it this year:

- The Interim final rule from the feds was published on **December 28, 2023**, just 4 days before the opt-in deadline for summer 2024 closed, so the timing was extremely challenging both from a programmatic and a budget standpoint - USDA Food and Nutrition Services did release some memos prior to the interim final rule, but it was still very unclear what the requirements were going to be in 2024;
- We did do the Pandemic Electronic Benefits Transfer (P-EBT) last Summer, however the Summer EBT program requirements are very different, detailed and extensive -- Children have to be determined financially eligible for summer EBT - either through a free/reduced priced meals application or through other categorical eligibility (SNAP, TANF, Medicaid);
- Because VT has universal meals, there are many households who aren't filling out free/reduced-priced meals applications at school, so we would have to collect those applications;
- Summer EBT requires that the state offer a summer EBT application to families who may be eligible but who aren't already showing up on an eligibility list. This is a brand new requirement – as we did not have to take applications for P-EBT last summer;
- Vermont paid out \$96 million to HHs for the P-EBT program using our spreadsheet method (March 2020 - summer 2023). Using excel spreadsheets and manually gathering and cleaning the data is not a responsible way to keep running the program;
- The State of Vermont had multiple meetings with both USDA as well as its congressional delegation to explore whether there was any flexibility for states in the first year for summer 2024 EBT implementation. Those meetings and requests proved unsuccessful.

Our 2025 Plans:

- State needs to identify the required 50% state funding;
- AOE is working to launch a statewide student information system in 2025 that will be able to pull data from all schools in VT;
- Vermont has been working on the planning and infrastructure needed in the state to successfully administer this program. To that end, the goal is to be able to offer this important summer nutrition benefit for eligible children starting in the summer of 2025

Details of the benefit:

- \$40/month, \$120/summer /child

- 30,000-35,000 children/summer = \$3.6M - \$4.2M/year (benefits are covered by Federal funds)
- Administrative costs were \$900,000 for P-EBT in summer 2023 this was 100% federally funded, looking to see what they would cost for FY25 and into the future. State pays 50% of administrative costs under the new Summer EBT program.

This article from Vermont Public does a decent job of describing the balance between wanting this program and being able to pull it off successfully and not at the cost of doing it poorly or disrupting other services: <https://www.vermontpublic.org/local-news/2024-01-08/vermont-opts-out-of-new-federal-food-assistance-program-due-to-administrative-costs>

I hope this is helpful. I have copied Miranda and Shayla in case they want to add anything else.

Sincerely,

Chris



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