

Summer EBT Verification

To ensure the quality and integrity of the program, Summer EBT agencies must have effective processes in place to accurately determine children's eligibility for Summer EBT benefits. One such process is verification, which is the process of confirming eligibility determinations made using a Summer EBT application by verifying information on the application with other administrative records or documentation provided by the household. Verification of Summer EBT applications is necessary to maintain program integrity. Requirements for verification may be found in 7 CFR 292.14.

STEPS FOR VERIFICATION

The following steps should be used by the Summer EBT agency when conducting verification:

Step 1 – Choose the verification sample from approved Summer EBT applications.

- The sample size for the Summer EBT agency must equal three percent of all applications approved by the Summer EBT agency from the start of the instructional year through April 1 of the school year immediately preceding the summer operational period. For example, for summer 2025, the agency's sample will include approved applications collected from July 1, 2024, to April 1, 2025.
- The applications chosen for verification must be randomly selected from all approved applications on file as of April 1.
- Benefits cannot be issued for applications selected for verification until the verification process is completed, with the exception of verification for cause.
- Applications verified for cause are not considered part of 3% sample size.

Step 2 – Conduct *direct verification* on all applications selected for verification.

Direct verification must be conducted prior to contacting the household for documentation. If eligibility can be verified through direct verification, the Summer EBT agency must not contact the household for documentation.

- Using the randomly selected applications, verify household income or categorical eligibility by matching against data sources or other records used in streamlined certification, as well as records from other assistance programs and administrative data, where available.
- For the purposes of direct verification, documentation may indicate participation in an approved program, such as SNAP, TANF, or FDPIR, at any point during the period of eligibility. The Summer EBT agency may conduct direct verification with other means-tested programs, but only if approved as part of their POM.
- The information reviewed for direct verification only needs to indicate eligibility at a single point in time during the period of eligibility, not that the child was eligible at the time of application or verification. For example, if the agency finds that the child participated in a means-tested program approved for use in direct verification at any point during the period of eligibility, they are considered to have been directly verified, and **verification for the application is complete**. No additional household notification is needed specific to the outcome of direct verification.

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- If eligibility cannot be confirmed through direct verification, the Summer EBT agency must move the application to Step 3 and verify the application by requesting documentation from the household.

Step 3 – Notify households that they have been selected for verification and request documentation.

As noted in Step 2, the Summer EBT agency must contact all households selected for verification that are not verified through direct verification. Any communication with households concerning verification must be in an understandable and uniform format and, to the maximum extent practicable, in a language that parents and guardians can understand. Prototype verification notification letters are included in the [NSLP Verification Toolkit](#).

- Households selected for verification must be notified in writing that their applications were selected for verification. The written statement must include:
 - The full USDA Nondiscrimination Statement,
 - A telephone number, prominently displayed on the notice, to contact for assistance,
 - A description of the type of information or documents that will be accepted, including:
 - Written evidence (wage stubs, letter from employer)
 - Records showing participation in an approved program
 - The date by which they need to respond, as determined by the Summer EBT agency,
 - A statement informing them that they may, instead of submitting proof of income, submit proof that the children receive assistance under SNAP, FDPIR, TANF, or any other programs used for streamlined certification,
 - A statement that they may, instead, request that the Summer EBT agency contact the appropriate officials, such as a social service agency, school official, and migrant agency, to confirm that their children are foster, homeless, migrant, or runaway, and
 - A statement informing them that the failure to cooperate with verification efforts will result in a denial of benefits.

Step 4 – Review sources of information received from household.

As noted in Step 3, households selected and notified of their selection for verification must provide documentation of income. The documentation must indicate, the source, amount received, and the date, as well as the frequency of all household income. The documentation may indicate eligibility at any point during the period of eligibility.

- Written evidence must be used as the primary source of information for verification. Written evidence includes written confirmation of a household's circumstances, such as:
 - Wage stubs,
 - Unemployment, Disability, or Worker's Compensation notice,
 - Support payment decrees from courts,
 - Award letters, and
 - Letters from employers.

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- To confirm eligibility, the Summer EBT agency must compare household size and the total household gross income to the applicable income eligibility guidelines for reduced price meals under the National School Lunch Program.
- Whenever written evidence is insufficient to confirm income information on the application or current eligibility, the verifying agency may require confirmation from a person outside of the child's household, as explained in Step 3. These may be made in person or by phone. Households that indicate zero income should provide a brief note explaining how they provide food, clothing, and housing for their household, and when they expect an income.
- The Summer EBT agency may also accept verbal confirmations of a household's circumstances by a person outside of the household.

Step 5 – Follow-up with any household that has not responded by the original due date.

- The Summer EBT agency must make at least two attempts, at least one week apart, to contact any household that does not respond to a verification request. The attempt may be through a telephone call, email, or mail, and must be documented.
- A household's failure to cooperate with verification efforts must result in the termination of Summer EBT benefits.

Step 6 – Notify households of their final verification determination.

- If verification efforts confirm eligibility for Summer EBT benefits, the Summer EBT agency should (to limit potential household confusion about eligibility) send the household a notice that includes the following information:
 - The full USDA Nondiscrimination Statement,
 - No change in their eligibility status, and
 - Date benefit will be received.
- If a household does not respond to verification after the initial contact and two follow-up requests, or if verification results do not support eligibility for Summer EBT, the Summer EBT agency must properly document it, and send the household a notice that contains the following information:
 - The full USDA Nondiscrimination Statement,
 - The change to their eligibility status,
 - The reason(s) for the change,
 - Notification of the right to appeal and when the appeal must be filed,
 - Instructions on how to appeal, and
 - Their right to reapply at any time during the instructional year or summer operational period.

ADDITIONAL INFORMATION

Rolling verification: Summer EBT agencies may choose to conduct verification on a rolling basis, so long as the three percent sample size requirements are met. Rolling verification details must be included in the agency's POM submission for USDA approval. Rolling verification allows Summer EBT agencies to verify a sample of households throughout the year instead of waiting until April 1. This approach could help to reduce the burden of a large volume of verification requests that would happen at one time.

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To complete rolling verification, the Summer EBT agency must:

- Decide how often to sample applications.
 - For example, a Summer EBT agency may decide to select and verify applications on the first of every month.
- Include in each sample pool only applications approved since the last sample was selected.
- Select three percent of approved applications, as required by the sampling method, each time, but round down to the nearest whole number to prevent over-sampling.
 - If rounding down results in a zero, no applications should be verified for the sample period, and the applications received in that sample period should be included in the next sample pool.
- Follow steps for conducting verification, as outlined above, each time the agency samples throughout the year.
- Select the final sample on April 1 and ensure that a total of three percent of applications were verified during the year by:
 - Summing the number of applications selected for verification to date (including the final, April 1 sample), and
 - Calculating three percent of all applications approved as of April 1 and rounding up to the next whole number.
- If the number of applications summed is less than the three percent calculated, the Summer EBT agency must fill the remainder of the sample by selecting randomly from all approved applications.

Below is an example of a Summer EBT agency conducting rolling verification. The agency will select three percent of approved applications every other month starting on August 1 through April 1.

Time Frame	July 1-31	August 1-September 30	October 1-November 30	December 1-January 31	February 1 – April 1		Total
Approved applications	1,927	5,844	7,512	2,058	13,283		30,624
Calculation for sample	1927 x .03 = 57.81	5844 x .03 = 175.32	7512 x .03 = 225.36	2058 x .03 = 61.74	13283 x .03 = 398.49	Final Total	30624 x .03 = 918.72
# to verify	57	175	225	61	398	916	919

On April 1, the Summer EBT agency had 30,624 approved applications. The three percent sample size for verification should be 919 applications. During the rolling verification period, the agency verified 916 applications, so the agency must randomly select three more applications to complete verification.

Alternative verification processes: In lieu of carrying out the random three percent sampling procedure, Summer EBT agencies may propose alternative methods for verification that still strengthen program integrity and preserve participant access. Summer EBT agencies that intend

to propose alternative procedures must include a detailed description of their plan in their POM submission for USDA approval.

Verification for cause

Summer EBT applications will be subject to a verification process for cause. This means that questionable applications can be verified on a case-by-case basis. Questionable applications may include those with conflicting or inconsistent information. For example, if a household submits two separate applications with differing information, the Summer EBT agency may decide to verify the application for cause due to inconsistencies. When conducting verification for cause, the Summer EBT agency must follow the steps for conducting verification that are outlined above. If a Summer EBT agency is alerted to a questionable application after initial approval or issuance of benefits, no further benefits should be issued until verification for cause is complete and eligibility is confirmed.

RESOURCES

- The [Verification toolkit](#) contains a collection of resources that Summer EBT agencies can use in their efforts to improve verification response rates and the overall efficiency of the process.
- [Eligibility Manual for School Meals](#) includes guidance on ensuring the accuracy of eligibility determinations through the verification process.
- Verification requirements can be found at [7 CFR 292.14](#).