

VERIFICATION IN SUMMER EBT

These two types of verification apply to ALL Summer EBT agencies.¹

Direct Verification

- Summer EBT agencies must conduct direct verification activities with the programs used for streamlined certification, as well as records from other assistance programs and administrative data, where available.
- Direct verification must be conducted **prior** to contacting the household for documentation.
- For the purposes of direct verification, documentation may indicate participation in an applicable program or income at any point during the period of eligibility.
- Summer EBT agencies must include in their POM submission all sources of administrative data they intend to use for direct verification.

Verification for Cause

- The Summer EBT agency must verify for cause applications, on a case-by-case basis, such as in an instance when the agency is aware of conflicting or inconsistent information from what was provided on the application.
- The Summer EBT agency may verify an application for cause at any time during the instructional year or summer operational period.
- Applications verified for cause are not considered part of three (3) percent sample size described in the blue Verification for Cause box.

Summer EBT agencies must then pick one of two options to implement in addition to Direct Verification and Verification for Cause:

Option 1: Verification Sample

- The Summer EBT agency must verify eligibility of children in a sample of household Summer EBT applications approved for benefits for the summer.²
- The sample size for the Summer EBT agency must equal three (3) 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.
- The sampled application must be randomly selected from all approved applications on file as of April 1.^{3,4}

Option 2: Verification Alternative

- In lieu of carrying out the random three (3) percent sampling procedure, Summer EBT agencies may propose alternative methods for verification.
- Summer EBT agencies that intend to propose alternative procedures must include a detailed description of their plan in their POM submission for USDA approval, including a description about how the procedure strengthens program integrity while still preserving participant access.

¹ In 2024, Summer EBT agencies or LEAs should, on a case-by-case basis, verify for cause any questionable Summer EBT application or alternate income applications used to confer Summer EBT eligibility. Summer EBT agencies do not need to select a sample or come up with an alternative verification procedure for Summer 2024.

² The Summer EBT agency may, on a case-by-case basis, replace up to ten percent of applications that are randomly selected as part of the verification sample. Applications may be replaced if the Summer EBT agency determines that the household would be unable to satisfactorily respond to the verification request.

³ Summer EBT agencies can randomly select applications and reach out to families on a rolling basis in a procedure referred to a “rolling verification.” More information about rolling verification can be found in this [Verification Toolkit](#).

⁴ Even though the random sample is based on applications on file as of April 1st, that applications that come in after that date are still subject to verification for cause.

General Notes:

These requirements apply to all applications verified through verification for cause, a random verification sample, or an alternative proposed by the Summer EBT agency. These requirements do not apply to applications verified through Direct Verification.

- Households selected for verification must be notified in writing that their applications were selected for verification. The written statement must include:
 - a telephone number to contact for assistance
 - a description of the type of information or documents that will be accepted, including:
 - written evidence
 - verbal confirmations from employers, case workers, school officials (sometime referred to as “collateral contacts”)
 - 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, 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 to confirm that their children are foster, homeless, migrant, or runaway,
 - a statement that if the household thinks information obtained by the Summer EBT agency is incorrect, they may provide other documentation, and
 - a statement informing them that the failure to cooperate with verification efforts will result in a denial of benefits.
- Any communications 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.
- Verification documentation can be from any time during the period of eligibility.
- Summer EBT agencies must make at least two attempts, at least one week apart, to contact any household that does not respond to a verification request.
- If there is a change in eligibility status as a result of verification, Summer EBT agencies must properly document it, and send the household a notice that contains the following information:
 - 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
 - about their right to reapply at any time during the instructional year or summer operational period.
- With the exception of applications that are selected for cause after benefits have been issued, verification needs to be completed before benefits are issued.
- If applicable, Summer EBT agencies need to develop procedures to conduct verification for children in year-round schools and submit their proposal for USDA approval in the POM.
- Verification efforts must be applied without regard to race, sex, color, national origin, age, or disability.

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