Summer Electronic Benefits Transfer For Children: Early Experiences through June 2011 of the Proof-of-Concept Year
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Summer Electronic Benefits Transfer For Children:
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Proof-of-Concept Year

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EXECUTIVE SUMMARY

As part of its efforts to end child hunger, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) created the Summer Electronic Benefits Transfer for Children (SEBTC) demonstration to study the use of electronic benefits transfer (EBT) technology to provide food assistance to low-income children during the summer. The 2010 Agriculture Appropriations Act (P.L. 111-80) authorized and provided funding for the demonstration and a rigorous evaluation of SEBTC’s effects on food insecurity among households with children. FNS contracted with Abt Associates, Mathematica Policy Research, and Maximus to conduct the evaluation, including impact, cost, and implementation analyses.

This report describes the early experiences of the five State agencies receiving grants to implement the demonstration during a proof-of-concept (POC) year. It covers activities through the first week of benefit administration in the summer of 2011. Given that this is the first time this demonstration has been implemented, FNS expected that States would face a range of unanticipated challenges. This report documents those challenges, the solutions that States initiated, and the successes they achieved through the start of the summer. The executive summary to this report provides a description of the grantees, and then summarizes their early implementation experiences, including developing accurate lists of eligible children and households; the process of obtaining consent from these households and then randomly assigning them to receive the benefit and notifying them of their status; and undertaking EBT system modifications. The summary ends with a description of the status of the grantees in the first weeks after the summer period began.

Description of the Grantees

FNS designed the demonstration in two phases. In the initial POC phase in 2011, the demonstration is being implemented on a limited scale by five grantees, each of whom can offer SEBTC benefits to 2,500 eligible children certified for free and reduced price (FRP) meals through the National School Lunch Program (NSLP) or School Breakfast Program (SBP) (Table ES.1). The POC sites are located in Connecticut, Michigan, Missouri, Oregon, and Texas. If the POC demonstration is successful, FNS will expand the demonstration in 2012 by adding up to 10 new grantees and doubling the number of children receiving benefits to 5,000 per demonstration area.

Table ES.1 The Grantees, Participating Local Areas, and Program Models

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Area Served</th>
<th>Number of School Food Authorities</th>
<th>Program Model</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT Department of Social Services</td>
<td>Windham and New London Counties</td>
<td>17*</td>
<td>SNAP</td>
</tr>
<tr>
<td>MI Department of Education</td>
<td>Grand Rapids</td>
<td>1</td>
<td>WIC online</td>
</tr>
<tr>
<td>MO Department of Social Services</td>
<td>Kansas City</td>
<td>3</td>
<td>SNAP Hybrid</td>
</tr>
<tr>
<td>OR Department of Human Services</td>
<td>Linn and Jefferson Counties</td>
<td>10</td>
<td>SNAP Hybrid</td>
</tr>
<tr>
<td>TX Department of Agriculture</td>
<td>El Paso County</td>
<td>1</td>
<td>WIC offline</td>
</tr>
<tr>
<td>TX Department of State Health Services</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Grant proposal documents and technical assistance efforts with grantees.

* The Connecticut grantee initially proposed to enroll 23 contiguous school food authorities (SFAs). During the course of early implementation, six decided not to participate, leaving a final count of 17 SFAs.
SEBTC uses the existing benefit delivery systems for the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to enhance the food purchasing power of households with eligible children during the summer. Specifically, households with eligible children will receive the benefits through EBT cards. Households will receive benefits valuing approximately $60 per month per child, the average cost of food portion of FRP meals under the NSLP and SBP.

Three of the five states—Connecticut, Missouri, and Oregon—are administering SEBTC through their SNAP EBT systems. Of these, Missouri and Oregon are implementing what is termed the “SNAP hybrid” model. For this approach, the State issues benefits on existing EBT cards for participants already receiving SNAP benefits, and households who do not have active SNAP EBT cards receive a new card for SEBTC. Connecticut is implementing the “SNAP” model where all SEBTC participants (both SNAP and non-SNAP) receive a separate EBT card designed for the demonstration. Under both SNAP and SNAP hybrid models, participants will be able to redeem $60 in benefits per child per month in SNAP-approved foods at any SNAP-authorized retailer.

Two states—Michigan and Texas—are using their WIC EBT systems to administer the demonstration, termed the “WIC” model. In both of these sites, participants will get a separate EBT card loaded with their summer benefits. Participants in these sites will be able to purchase only “allowable” foods prescribed in a SEBTC food package equivalent to $60 per child per month at WIC-authorized retailers. The package includes milk, juice, cheese, cereal, eggs, whole wheat bread, beans, peanut butter, and canned fish.

**Identifying Eligible Children and Households**

The success of the SEBTC demonstration and its evaluation rides on the ability of grantees and their partners to develop accurate lists of households that qualify for the benefit and ensure that contact information is up to date. All households in the demonstration area with children from pre-kindergarten through 12th grade who are certified for FRP meals can qualify for the SEBTC benefit. Even if the demonstration were not being rigorously evaluated, the step of identifying these households is critical. It will ensure that the full eligible population has a chance to participate and, if selected, that benefits, in the correct amounts, can be issued to them.

Since the benefits are provided to guardians for all of the eligible children in the household, grantees and SFAs used a two-step process of first identifying children who qualify for FRP meals and then grouping those children into households. This process challenged some of the grantees in part because children can be certified for FRP meals in two different ways (through an NSLP application or through direct certification), and in part because school districts sometimes had multiple records for the same family. The result was relatively high numbers of duplicate households on some grantees’ lists, which sometimes could only be removed through manual processes. Grantees also encountered unanticipated data quality issues. Despite these issues, grantees and participating SFAs were able to successfully create lists of eligible children and work with the evaluation team to group them into households.

**Consent, Random Assignment and Notification of Households**

Random assignment is the cornerstone of the impact evaluation of the SEBTC demonstration. The use of random assignment ensures that any differences observed between children and households assigned to the benefit group and non-benefit group can be attributed to the SEBTC benefit with a known degree of statistical precision.
Before random assignment can occur, SFAs had to obtain consent from households to participate in the demonstration and to release contact information to the grantee and evaluator. Three sites—Connecticut, Michigan, and Oregon—chose to use an “active” consent process where households had to return a signed form if they wanted to “opt in” or have the opportunity to receive the benefit. Two sites—Missouri and Texas—chose a “passive” consent process where households had to return a signed form if they wished to “opt out” or not participate in the demonstration and evaluation.

All of the grantees were able to successfully complete the consent process and obtain at least the minimum number of children and families needed to participate in the demonstration and evaluation (Table ES.2). However, the issues encountered during the consent process differed between States that used active consent and those that used passive consent. Grantees that used passive consent were more likely to achieve high numbers of consenting households given that few families chose to opt out of the demonstration; however by the nature of the process, contact information was more likely to be inaccurate in passive consent sites. Grantees that used passive consent are actively promoting the benefit among the demonstration group to help ensure that families selected are aware of and will take up the benefit.

### Table ES.2 Consent Rates by Grantee

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Approximate # of Eligible Households and Children in Demo Area</th>
<th>Percentage Opting Out or Consent Letters Undeliverable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Passive Consent Grantees</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Missouri</td>
<td>10,864 households with 19,745 children</td>
<td>11% of households and children</td>
</tr>
<tr>
<td>Texas</td>
<td>20,236 households with 38,291 children</td>
<td>1% of households and children</td>
</tr>
<tr>
<td><strong>Active Consent Grantees</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Connecticut</td>
<td>8,011 households with 11,117 children</td>
<td>30% of households and 38% children</td>
</tr>
<tr>
<td>Michigan</td>
<td>10,603 households with 16,417 children</td>
<td>37% of households and 47% of children</td>
</tr>
<tr>
<td>Oregon</td>
<td>8,923 households with 12,758 children</td>
<td>24% of households and 35% of children</td>
</tr>
</tbody>
</table>

Source: Data obtained through technical assistance efforts and files submitted by grantees for random assignment.

By contrast, the active consent process ensures that families received a consent letter and made an effort to participate in the random assignment process. This implies that families desire and are likely to use the benefit if they receive it. However, many households that might have desired the benefit in active consent sites may not have opened the consent materials, understood the information, or did not return the consent materials for other, unknown reasons. As a result, consent rates for active sites were lower than some grantees anticipated (between 24 and 37 percent of contacted households). It is unclear whether active consent households are typical or atypical of households likely to participate in the program, should it be fully implemented nationally.

Once sites had completed the consent process, households were randomly assigned to either receive the SEBTC benefit (the benefit group) or not (the non-benefit group). Random assignment was performed successfully and resulted in the benefit and non-benefit groups being balanced in number of eligible children, and by SFA or groupings of SFAs in each site. Grantees and their partners then notified households of their random assignment and began the process of setting up new or modifying existing accounts for those selected to receive the SEBTC benefit.
As with other early implementation activities, enrolling participants in the program was not without its challenges. The three States using the SNAP technology had to manually match the list of benefit group members to their existing State databases. In addition, one State using the SNAP technology and one State using WIC technology had to complete additional steps to distribute cards to households. One State had to collect additional data (including social security number and date of birth of guardians) from households that were not already in their State system. Despite significant time and resources, the grantee was unable to obtain required information from all households in the benefit group by the end of June 2011. The other State required households to attend in-person training to receive their card and, by the end of June, some households were not able to be reached or chose not to attend the training to receive their benefits despite persistent encouragement.

**EBT System Modifications and Operations**

Grantees leveraged existing SNAP and WIC EBT technologies and telecommunications networks to issue benefits and cards. However, a range of modifications had to be made to accommodate the specific needs of the demonstration. EBT processors in all five sites were able to complete system modifications and testing before the start of the summer benefit.

**The Status of Grantee Operations at the Start of Summer 2011**

Despite conducting demonstration activities for the first time, working under extreme time pressure, and facing many challenges, the five POC grantees passed a series of major milestones in preparation for administering the SEBTC benefit. In particular, they were able to identify eligible children and households, complete the consent process, notify households of their random assignment, complete EBT systems modifications, and start issuing benefits for the majority, if not all, of the households selected to receive them.

All five grantees were able to successfully start the administration of benefits on the day after the 2010-2011 school year ended. Through the first week after school ended, States had issued benefits to between 57 and 100 percent of households assigned to the benefit group. In the three sites that require households to activate their cards, 35 to 71 percent of all benefit-group households had selected a personal identification number (PIN) and activated their SEBTC benefits during this same period. Grantees reported, cumulatively, that households had purchased $221,122 in food during the first week of benefits administration.

**Next Steps for the Demonstration and Evaluation**

In June 2011, FNS released a request for applications to award up to 10 new grants to States for the full demonstration year in 2012. Building on what was learned in 2011, these new grantees will be able to learn from the experiences of the POC grantees and will hopefully face fewer unanticipated challenges as they implement this new program.

Documenting grantee progress over time, this report is the first in a series of evaluation reports. The evaluation will continue to track the successes and challenges of grantees and their partners as they administer benefits. It will also begin to track household usage of the SEBTC benefits and the food security of children in those households during summer 2011. In fall 2011, the evaluation team will produce a congressional report that describes implementation experiences through mid-July and early impact findings. A final report for the POC year will be delivered in early 2012 and will include complete results from the implementation, cost, and impact analyses.
I. INTRODUCTION

Too many of our nation’s children lack a safe and secure source of food. The problem increases during the summer months when children do not have access to free or reduced price (FRP) meals provided by the National School Lunch Program (NSLP) or the School Breakfast Program (SBP)\(^1\). Although the Summer Food Service Program (SFSP) provides meals and snacks to children during the summer, it reaches many fewer children than the school year programs (Gordon and Briefel 2003; Food Research and Action Center 2010).

As part of its efforts to end child hunger, the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) is studying alternative approaches to providing food assistance to children during the summer. The 2010 Agriculture Appropriations Act (P.L. 111-80) authorized and provided funding for the USDA to implement and rigorously evaluate the Summer Electronic Benefits Transfer for Children (SEBTC) Demonstration. FNS contracted with Abt Associates, Mathematica Policy Research, and Maximus to study how the program unfolded over time and its impact on program participants.

This report describes the early implementation experiences of the five State agencies receiving grants to implement the demonstration in 2011. As a foundation for the remainder of the report, this introductory chapter discusses the issue of summer food insecurity among children, provides an overview of the demonstration, describes the evaluation, and provides a road map for the remainder of the report.

A. Summer Food Insecurity Among Children

Despite four USDA food programs\(^2\) that provide meals directly to children, the prevalence of food insecurity remains high for households with school-age children. In 2009, of all households with children, 6.6 percent experienced very low food security (VLFS), compared to 5.7 percent for all households nationwide (Nord et al. 2010). Parents often, however, cut or skip meals to prevent their children from going without food. When there is not enough food for everyone in the family, the children may also cut or skip meals. Households in which the children’s regular meal patterns are disrupted or food intake is reduced to below the amount caregivers consider sufficient are characterized as having VLFS among children (VLFS-C). The prevalence of VLFS-C nationwide is 1.2 percent among households with children. Among households with income less than 185 percent of poverty, food insecurity is considerably higher, with 14 percent experiencing VLFS and 2.9 percent experiencing VLFS-C. Among households with income below the poverty line, the prevalence of VLFS was 19 percent and VLFS-C was 4.1 percent.

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\(^1\) The NSLP and SBP provide subsidized meals to children in school. Children from low-income families obtain these meals free or at a reduced price. Children living in households with incomes at or below 130 percent of the poverty level are eligible to receive meals for free; those with incomes between 130 and 185 percent of poverty level are eligible for reduced price.

\(^2\) The four USDA food programs include the NSLP, the SBP, the SFSP, and the Child and Adult Care Food Program. For more information on these programs, visit the FNS website at http://www.fns.usda.gov/cnd/.
Chapter 1: Introduction

An in-depth analysis of School Nutrition Dietary Assessment Study-III data on food security provides insights into household characteristics of food insecure school-aged children (Potamites and Gordon 2010). Nearly all lived in low-income households; 90 percent lived in households with incomes at or below 185 percent of poverty, and most (72 percent) were at or below 130 percent of poverty. Nearly all food insecure children (93 percent) participated in NSLP, half (46 percent) received Supplemental Nutrition Assistance Program (SNAP) benefits, and 19 percent were in families that had used emergency food services in the last month. Use of the latter is an important indicator of a household’s strained resources and the risk of VLFS-C.

The problem of VLFS-C is most acute during the summer months when children are out of school. During the school year, most children in households with income equal to or below 185 percent of the poverty level have access to FRP lunch through the NSLP, with a smaller but still significant proportion also receiving FRP breakfast through the SBP. However, access to meals during the summer months is more limited, increasing the risk of VLFS-C.

National data from the Current Population Survey provide evidence that food insecurity changes seasonally. Households with school-age children were found to have a higher prevalence of food insecurity in the summer, and rates of food insecurity were greater in States with fewer SFSP and summertime NSLP meals (Nord and Romig 2006). The seasonal spike in higher food insecurity among households with school-age children in the summer is consistent with national data from the 2010 Feeding America survey—30 percent of food pantries, 26 percent of emergency kitchens, and 7 percent of shelters reported seeing many more children accompanying adults during the summer (Mabli et al. 2010).

The SFSP was implemented in 1968 to reduce the risk that children in low-income households would miss meals during the summer when they have little or no access to the NSLP and SBP. Research suggests that an expanded SFSP could, in principle, substantially reduce, though not eliminate, the summer spike in VLFS-C (Nord and Romig 2006). However, logistical and other practical considerations present barriers to expansion of the SFSP. Because the program is operated by schools, local governments, and local community-based organizations in churches and recreation centers, it has been challenging to find additional program operators and locations to expand the program dramatically. Furthermore, even in areas where substantial expansion of the SFSP may be feasible, rates of participation by eligible children would likely remain below those for the NSLP and SBP. An earlier evaluation reported barriers to SFSP participation, including lack of transportation to sites, lack of publicity about the program, limited site operation days/hours, lack of program activities, and parents’ concerns about neighborhood safety (Gordon and Briefel 2003). In addition, most SFSP sites operate for less than eight weeks, leaving low-income children without access to the program during several weeks in the summer. FNS is currently funding evaluations of demonstrations to expand the SFSP, including home delivery methods to provide summer meals to children in rural areas and provision of food backpacks to children to cover days when SFSP sites are not active. The agency has also funded two projects to test financial incentives to address other barriers to access in SFSP.3

3 More information on these evaluations and projects can be found on the FNS website at http://www.fns.usda.gov/ora/.
**B. The SEBTC Demonstration**

In response to the prevalence of food insecurity among low-income children during summer and limitations in coverage of the SFSP, Congress mandated USDA to implement a demonstration that uses the existing benefit delivery systems for the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to enhance the food purchasing power of households with eligible children during the summer. More specifically, the benefits will be delivered through the electronic benefits transfer (EBT) procedures used by the SNAP and WIC programs. This SEBTC Demonstration will supplement rather than replace the SFSP in the demonstration areas. One critical advantage of this approach is that it will not require the physical presence of children at sites where meals are served. By directly augmenting the food purchasing power of households with eligible children, FNS expects that a higher proportion of the children will actually have greater access to food, thus achieving the ultimate goal of reducing the prevalence of food insecurity among children.

FNS has specified that the demonstration be implemented in two phases. In the initial proof-of-concept (POC) phase in 2011, the demonstration will be implemented on a limited scale in five sites. If the POC demonstration is successful, FNS will expand the size of the demonstration in 2012 by adding up to 10 new sites.

The SEBTC benefit will be provided to households of children from pre-kindergarten through 12th grade who are certified for FRP school meals in the demonstration school food authorities (SFAs). The amount of the benefit—$60 per month per child in the household—is comparable to the food cost portion of free lunches plus breakfasts under the NSLP and SBP. Benefits will be provided monthly on an EBT card and will be prorated for partial months. Grantees will administer benefits in the summer for the period when schools are not in session.

The benefit will be administered differently in sites using the WIC and SNAP models. In WIC sites, participants will be able to purchase only “allowable” foods prescribed in a SEBTC food package at WIC-authorized retailers. The WIC package was specified by FNS based on existing WIC foods (see Appendix A). The package includes milk, juice, cheese, cereal, eggs, whole wheat bread, beans, peanut butter, and canned fish. It also includes a $16 voucher for fresh fruits and vegetables. Both sites implementing the WIC approach also worked with FNS to customize the package to meet the tastes of the local population (for example, substituting whole grain tortillas for whole wheat bread). Participants must purchase foods specified in the final package from WIC authorized vendors. In addition, WIC EBT cards can only be used in the State where they were issued. In SNAP sites, participants will be able to redeem $60 in benefits for SNAP-approved foods at any SNAP-authorized retailer. Unlike in the WIC model, participants can purchase a much wider range of foods, including meats, fish and poultry, all types of bread (not just whole wheat), and seeds and plants that produce food for the household to eat. As with credit or debit cards, SNAP EBT cards are portable and can be used in any State regardless of where they were issued. Grantees could choose to use current cards or issue new, distinctively different cards. If they use the current card, they will have to return the unused portion of the benefit at the end of the summer. If they use new cards, they will have to return the unused portion at the end of the school year.

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4 The term “site” refers to the local areas where the demonstration is being implemented.

5 SFAs are responsible for the provision of school meals and can include one or more schools or districts.

6 The term “grantee” refers to the State agency or group of agencies implementing the demonstration.

7 For a full list of SNAP-approved foods, visit the FNS website at http://www.fns.usda.gov/snap/faqs.htm#10.
current SNAP participants had additional benefits loaded onto their cards and families who did not have current cards received new SNAP cards loaded with SEBTC benefits. If a new separate card is issued, households with SNAP cards would get a second card.\(^8\)

Under both models, a portion of households with eligible children may not be familiar with or have participated in the WIC or SNAP program. Given that the SEBTC demonstration will use the same EBT technology as these programs and follow similar rules regarding eligible foods and vendors, sites need to educate participants about how to use their SEBTC cards, what foods are eligible for purchase, and how to find local WIC- or SNAP-approved retailers. Given the specific design of the WIC food package, sites implementing the WIC model expect to provide detailed information and/or more intensive training than SNAP sites. While this topic will be discussed in more detail in future reports, Chapter IV provides preliminary information on how sites will notify participants who are selected to receive benefits and train them on use of their summer benefits.

In the POC phase, FNS awarded five demonstration grants. Two States—Michigan and Texas—are implementing the WIC model. Two States—Missouri and Oregon—are implementing the SNAP-hybrid model, and Connecticut is implementing the SNAP model (with a separate card for SEBTC). Chapter II provides additional information about the participating States, their partner agencies, and the SFAs.

C. Overview of the Evaluation

In authorizing the SEBTC Demonstrations, Congress mandated USDA to conduct a rigorous independent evaluation of the demonstration. The evaluation design includes three components: an Impact Study, an Implementation Study, and a Cost Study. This report is the first in a series, including a Congressional report on the POC year due in fall 2011 and a report on the full results of the POC year due in early 2012. A similar series of reports will be produced for the full demonstration in 2012, as well as a comprehensive, two-year report. Below we describe the research questions, the overall study design, and the data sources used for this report.

1. Research Questions

The evaluation has four broad objectives:

1. To examine the impact of SEBTC benefits on children and their families
2. To describe receipt and use of the benefits
3. To examine the feasibility of implementing SEBTC benefits, and to document its costs, the approaches used, and the challenges and lessons learned during the demonstrations
4. To assess the feasibility of implementing three different models: a separately operating program using the WIC system, a separately operating program using the SNAP system, a separately operating program using the SNAP system.

\(^8\) In the SNAP-hybrid model, SEBTC benefits are loaded onto existing EBT cards for those participants already receiving SNAP, and only participants who are not on SNAP are issued a new card. In the SNAP model, a separate SEBTC card is issued to all demonstration participants using existing SNAP EBT systems, regardless of whether the participant has an active SNAP EBT card.
Chapter I: Introduction

and a hybrid system in which SEBTC benefits are included in benefits for SNAP participants.

Implementation analysis will address objectives 2 through 4. More specifically, it will address the following questions:

1. At what rate do households use SEBTC benefits? To what extent do households refuse to participate in the demonstration? Of those in the demonstration, at what rate do they activate the card, and of those, at what rate do they use the benefits?

2. When are the benefits used? Does it vary by month within the summer? Does it vary within a month? At what rate are the benefits exhausted? How far from the end of the month are benefits exhausted?

3. Where and for what are the benefits used? At what types of retailer are the benefits used? For what types of food are the benefits used?

4. Are the SEBTC-SNAP model and the SEBTC-WIC model operationally feasible? If so, under what conditions?

5. How is the demonstration implemented, what are the challenges encountered and lessons learned?

6. How much does it cost to operate the SEBTC-SNAP and SEBTC-WIC? What are the components of the cost?

2. Research Design

The evaluation uses a random assignment design to provide the most credible and rigorous estimates of the impact of the demonstrations. Households with one or more children certified for FRP meals and that consented to participate in the demonstration were randomly assigned to a benefit group that receives the SEBTC benefit or to a non-benefit group that does not. In each demonstration site, the evaluation team then selected a random subsample of households for the evaluation, including a treatment group that is receiving the benefit and a control group that does not, and will survey the households before the end of the school year and during the summer. These surveys will gather data for eligible households and children on food security, the household’s food expenditures, and child food consumption and eating behaviors as measures of diet quality and nutritional status, as well as other outcome measures. By comparing the values of these measures from the follow-up survey for treatment households and control households, we will obtain rigorous estimates of the impacts of the SEBTC.

To supplement the impact analysis, the evaluation involves a rigorous implementation study. Successful implementation of the demonstrations will require the involvement and cooperation of a number of State and local agencies and contractors in each demonstration site. The implementation study will assess the operational feasibility of the demonstration and identify the challenges encountered and lessons learned. To accomplish this, the evaluation team will collect a variety of data from organizations involved in the demonstrations. These include data from technical assistance efforts during early implementation that focused on working with sites to implement the processes of obtaining household consent to participate in the intervention, stakeholder interviews during in-depth site visits to each grantee, telephone interviews toward the end of implementation, and administrative reports and documents.
Chapter I: Introduction

The evaluation also includes a detailed analysis of SEBTC transaction data. This analysis will aim to understand patterns of household receipt and use of the summer benefits. Through the benefit period, EBT processors will transmit administrative records to the evaluation team on benefit acceptance, usage, and other information on the full sample of households assigned to the benefit group.

A cost analysis will also provide information on the total and component costs of implementing and operating the demonstration. This analysis will use quarterly and annual administrative cost reports to identify expenditures of grant funds by the grantee and its partners for personnel and other resources used to implement and operate the demonstrations. Each grantee will also provide a quarterly report showing SEBTC amounts obligated and redeemed, both for the reporting month and cumulatively for the year.

3. Data Sources for this Early Implementation Report

To describe the early implementation experiences of the five POC grantees, the evaluation team used three data sources, including (1) technical assistance visits and calls conducted to help with the start-up of demonstration activities; (2) spring process study interviews with grantees and their key partners, including EBT processors; and (3) written documents, such as grant applications and materials used to obtain parental consent to participate in the demonstration. These sources are described below in more detail.

A major source of information for this report comes from information that the team gathered from technical assistance efforts conducted between the start of the demonstration in December 2010 through the first week of benefit administration in summer 2011. Each grantee was assigned a team of Abt and Mathematica staff to help grantees understand and successfully implement the requirements of the evaluation. This included providing guidance on the development of lists of eligible children and households, providing feedback on the materials developed for the consent process, conducting random assignment, and providing feedback on materials to notify households of random assignment results. While the evaluation staff also provided some general aid to the sites as they brainstormed about challenges faced during early implementation, the technical assistance efforts were aimed at tasks related to the evaluation.

During these technical assistance efforts, evaluation site liaisons participated in routine teleconferences with grantees and their partners, exchanged emails as necessary, and conducted one round of technical assistance site visits per site in late January and early February 2011. These visits ranged from one to two days in length and involved two to four evaluation team members. Representatives from the grantees and their major partners were involved. In two of the five sites, representatives from the participating school food authorities (SFAs) were also present. Based on the information gathered during these visits, the evaluation site teams developed detailed documentation of their understanding of site operations, and successes and challenges through the first week of benefit administration in summer 2011. These internal documents served as the primary source of data for this report.

Second, the team conducted a series of in-depth site visits to each of the demonstration sites during late April and early May for the purposes of process study data collection. During these visits, the team conducted interviews with staff members of the grantee and all of its major partners. Interviews were also conducted with all participating SFAs in Texas, Michigan, and Missouri as well as 5 of the 17 participating SFAs in Connecticut and 5 of the 9 participating SFAs in Oregon. Although the full information gathered during these visits is not included in this report, information
shared during debriefs immediately following the site visits was incorporated. Full details from these site visits will be synthesized for the upcoming report to Congress and report of first-year impacts.

In addition, the evaluation team conducted interviews with each of the contractors operating the EBT systems in late April and early May. These interviews were conducted separately from the site visits discussed above. Some were conducted in-person while others were conducted via telephone. Topics discussed included the types of EBT system modifications required for the demonstration, the status of modifications, and challenges faced.

Finally, the evaluation team reviewed all of the grant applications and related materials, and assessed consent and notification documents that were developed for the SEBTC Demonstration.

D. Flow of Activities in Early Implementation

FNS, the grantees, and the evaluation team began work in December 2011 and had to complete numerous tasks before the end of the 2010-2011 school year when SEBTC benefits become available to households. Figure I.1 lays out the flow of activities that had to be accomplished during

**Figure I.1  Flow of Activities in Early Implementation**

SEBTC = Summer Electronic Benefits Transfer for Children
early implementation. Once policy was set, grantees and participating SFAs had to identify eligible children and group those children into households. The evaluation team then conducted random assignment to determine the benefit and non-benefit groups. Grantees then notified both groups of their assignment, and began the process of loading benefits onto and distributing EBT cards. At the same time, the evaluation team selected a research sample and began the survey effort.

E. Report Contents

The purpose of this report is to describe the early implementation experiences of the SEBTC grantees in the first stages of the POC year. It highlights both successes and unanticipated challenges that might have implications for next year’s implementation, when it expands to up to 15 sites. It begins to address implementation study questions on the operational feasibility of the demonstration, challenges encountered and lessons learned (Implementation study questions 4 and 5 in Section C above), providing information about grantees’ early experiences. While the report presents factual information by grantee, it does not, wherever possible, identify grantees when discussing issues or challenges.

Beyond this introduction, findings in this report are presented in a series of five additional chapters. Chapter II provides an overview of the selected grantees and their partner agencies and describes the variations in the overall program models they chose to implement. Chapter III describes the process of identifying eligible children and grouping them into households. Chapter IV then examines the consent and random assignment process, a critical step in grantee efforts thus far. The report then turns in Chapter V to discuss the types and status of EBT systems modifications required for the demonstration. Finally, Chapter VI summarizes early findings about the successes and challenges that States and local areas experienced through the first week of benefit administration in summer 2011.
II. THE PROOF-OF-CONCEPT GRANTEES

When awarding the POC grants, FNS provided the States with flexibility regarding organizational roles, which local SFAs to include, which program model to use (SNAP or WIC), and other aspects of demonstration operations. To accomplish the common objective of issuing SEBTC benefits during the summer months, the five States that were awarded grants pursued varied strategies to implement the demonstration. An understanding of these variations and the contributing partners provides important context for descriptions in later chapters of the early implementation experiences. Therefore, this chapter describes the grantees and their partner agencies, discusses the local areas and participating SFAs, then summarizes the variation in program models being implemented for the Summer EBT for Children (SEBTC) Demonstration. Table II.1 provides a snapshot of the major grantee characteristics discussed in the chapter.

A. The Grantees and Their Partners

FNS indicated in its Request for Applications (RFA) that implementation of this new program would require close collaboration between the agency that oversees school meal programs and the agency that administers SNAP or WIC. It also indicated that it may be appropriate for the governor’s office to play a role given the level of coordination needed. The RFA also allowed States to decide which of these agencies would lead the effort and serve as the official grantee.

Three of the five States—Connecticut, Missouri, and Oregon—chose to include the agency that administers the SNAP or WIC program as the lead grantee. One State—Texas—had co-leads with the Texas Department of State Health Services (TDSHS) that administers the WIC program, working in collaboration with the Texas Department of Agriculture (TDA). The last grantee—Michigan—chose to have the Department of Education (MDE) serve as the grantee. Michigan chose this strategy for two main reasons. First, it believed MDE was best positioned to generate the list of eligible children from the school records data. Second, MDE has a strong relationship with the Grand Rapid Public Schools SFA, which would serve as the State’s demonstration area. However, during the site visit to Michigan in late April, several respondents from both agencies noted that it might have been strategic and beneficial to make the WIC agency a co-lead on the grant given its level of involvement and effort in the demonstration.

In addition to Michigan, three States included the State Education Agency as a partner on the grant, but there is variation in the types and extent of their involvement. In Connecticut, the Department of Education is a primary partner as the lead contact for the participating SFAs. It drafted consent and notification letters, provided guidance to SFAs on recruiting and enrolling households, and consolidated data from the SFAs for submission to the evaluation team. However, in Oregon and Missouri, the Department of Education plays only a planning and advisory role, reviewing materials and providing guidance as needed. To supplement the work of the State agencies, the Missouri grantee chose to use a community-based organization called the Local Investment Commission (LINC) to serve as the liaison between the State and the SFAs. In Oregon, the State SNAP agency chose to have a direct relationship with the 10 SFAs after key staff in the
Table II.1 The Grantees, Their Partners and Participating Local Areas

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Major State and Local Partners</th>
<th>Area Served</th>
<th>Number of SFAs</th>
<th>Urban/Rural</th>
<th>Percent of Children on FRP Meals&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Approximate Number of Eligible Children</th>
<th>Program Model&lt;sup&gt;b&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT Department of Social Services</td>
<td>CT State Department of Education End Hunger! Connecticut</td>
<td>Windham and New London Counties</td>
<td>17&lt;sup&gt;d&lt;/sup&gt;</td>
<td>Mostly Rural</td>
<td>10 to 73</td>
<td>11,000</td>
<td>SNAP</td>
</tr>
<tr>
<td>MI Department of Education</td>
<td>MI Department of Community Health</td>
<td>Grand Rapids</td>
<td>1</td>
<td>Urban</td>
<td>80</td>
<td>16,000</td>
<td>WIC online</td>
</tr>
<tr>
<td>MO Department of Social Services</td>
<td>MO Department of Health and Senior Services Local Investment Commission</td>
<td>Kansas City</td>
<td>3</td>
<td>Mostly Urban</td>
<td>78</td>
<td>21,000</td>
<td>SNAP Hybrid</td>
</tr>
<tr>
<td>OR Department of Human Services</td>
<td>Partners for a Hunger-Free Oregon Oregon Hunger Task Force Oregon Food Bank Oregon State University Extension Service Oregon Department of Education</td>
<td>Linn and Jefferson Counties</td>
<td>10</td>
<td>Mostly Rural</td>
<td>51</td>
<td>12,000</td>
<td>SNAP Hybrid</td>
</tr>
<tr>
<td>TX Department of Agriculture TX Department of State Health Services</td>
<td>West Texas Food Bank of El Paso Ysleta Independent School District</td>
<td>El Paso County</td>
<td>1</td>
<td>Mostly Urban</td>
<td>83</td>
<td>38,000</td>
<td>WIC offline</td>
</tr>
</tbody>
</table>

Source: Grant proposal documents and technical assistance efforts with grantees.

<sup>a</sup> Approximations based on data in grant proposals.

<sup>b</sup> Calculation based on data in grant proposals and provided during technical assistance efforts.

<sup>c</sup> Missouri and Oregon are using a SNAP Hybrid model, which means that SEBTC benefits will be loaded onto existing EBT cards for those participants already receiving SNAP. Under the SNAP Hybrid model only participants who are not on SNAP will be issued a new card. In Connecticut, a separate SEBTC card will be issued to all demonstration participants using existing SNAP EBT systems. In the WIC sites, Michigan uses a conventional online system that uses a central host computer to store food prescription balances and authorize purchases, so transactions are processed via an online connection to the host. Texas uses an offline system with “smart cards” that have an embedded chip that includes the information about the specific foods available to the card holder and does not have real-time communication with the EBT host system during the transaction.

<sup>d</sup> The Connecticut grantee initially proposed to enroll 23 contiguous SFAs. During the course of early implementation, six decided not to participate, leaving a final count of 17 SFAs.
Chapter II: The Proof of Concept Grantees

Department of Education facilitated initial contacts. Finally, the Texas grantees do not partner with the Department of Education on this grant.\(^9\) Instead, like Oregon, the grantees in Texas have a direct relationship with the participating SFA (the Ysleta Independent School District).

Planning and implementing SEBTC is a large undertaking, requiring the involvement of other State offices in several States. In Michigan, the Michigan Department of Community Health–WIC Division plays a large role in implementing the demonstration as it administers the benefit through its system. In Missouri, the grant manager is not a staff member at the grantee agency but rather a partner agency—Missouri Department of Health and Senior Services (DHSS)—that oversees the SFSP. Unlike in other States, this grant manager reports directly to the governor’s office, given the strong interest in the demonstration. In addition, other staff from DHSS play an advisory role. In Texas, as mentioned earlier, TDSHS, serves as a co-lead agency for the grant and works jointly with the Texas Department of Agriculture to administer benefits. Specifically, TDSHS provides the operational infrastructure support, including system support on its existing WIC EBT Card system, contracting to provide system modifications and card issuance, notification of retailers, training of West Texas Food Bank staff, and hotline services necessary to support the implementation.

Four of the grantees also chose to partner with local community organizations to help with outreach and encourage participation. In Missouri, LINC has a large presence in Kansas City and has used its network of staff within the participating schools to support the demonstration effort. Connecticut partners with End Hunger Connecticut! to help encourage parents to participate in the demonstration. Oregon has multiple partnerships with local community organizations, but one of the most important is its partnership with the Tribal Government. This relationship will help Oregon get support and participation from tribal families on the Warm Springs Reservation. Finally, a major partner in Texas is the West Texas Food Bank, which is responsible for notifying the group that will receive SEBTC, distributing the EBT cards and training participants to use them, and providing more general support and outreach to participants.

B. The Local Context

FNS required in its RFA that grantees select one or more SFAs to participate in the demonstration. These SFAs had to include at least 10,000 eligible children and, if more than one SFA was selected, the SFAs had to be geographically contiguous. The characteristics of the targeted areas, the number and size of the participating SFAs, and the availability of the SFSP in the local area provide important context for the grantees’ implementation experiences.

1. The Targeted Local Areas

The five POC grantees serve a variety of geographic areas that include urban centers, rural areas, and one Indian tribal reservation. Three grantees are serving large urban areas (Michigan, Texas, and Missouri), whereas the other two grantees (Connecticut and Oregon) are serving multiple counties that include predominantly rural areas. The size of the local population varies from just over 136,000 residents in the two counties served in Oregon to 750,000 in El Paso.\(^10\)

\(^9\) Texas is unique among the five States in having the school nutrition programs administered by the Department of Agriculture instead of the State Education Agency (SEA).

\(^10\) In Texas, the participating SFA—Ysleta Independent School District—is one of nine in El Paso County.
The racial and ethnic characteristics of local populations also vary substantially across the grantees. According to U.S. Census data, the two counties being served by the Connecticut grantee are predominantly white, at 94 percent. Local areas being served in Oregon also have largely white populations; however, with the presence of the Warm Springs Reservation, 15 percent of residents in Jefferson County and 1 percent in Linn County are of American Indian descent. Local areas in Michigan and Missouri have somewhat higher proportions of minorities, with 20 and 31 percent blacks and 13 and 7 percent Hispanics, respectively. The local area served in Texas includes a largely Hispanic population, at 82 percent.

2. The Participating SFAs

Given the size of these target areas, all five grantees met or exceeded the FNS requirement that participating areas include at least 10,000 eligible children. The number of eligible children in the target areas range from about 11,000 in Connecticut to about 38,000 in Texas. When selecting participating areas, the grantees had to consider how many local SFAs would be needed to achieve these requirements. As mentioned earlier, FNS required that the SFAs be geographically contiguous but did not provide any other specific requirements.

As expected, the number of participating SFAs is closely related to the urbanicity of the target area. Texas and Michigan are working with just one SFA each. Data gathered through technical assistance efforts and grant proposals suggest that the proportion of school-aged children in these areas that qualify for FRP meals is 83 percent in El Paso and 80 percent in Grand Rapids.

Although the Kansas City School District alone would have provided enough eligible students for the Missouri grantee, the grantee felt it was important to also include the nearby school district of Hickman Mills. The grantee explained that the SFA has a high poverty rate and that there is a growing need for economic support within that community. However, because the Kansas City and the Hickman Mills school districts are not contiguous as required by the grant, the grantee included the Center School District, which joins Kansas City and Hickman Mills. Across the three districts, 78 percent of school-age children qualified for FRP meals, according to the Missouri grant proposal.

Unlike the other three grantees, Oregon and Connecticut are targeting more rural areas and consequently partnered with numerous SFAs. Connecticut purposefully targeted a portion of the State where the availability of SFSP was low. Officially, Oregon partnered with 9 SFAs. Although the children from the Warm Springs Reservation attend schools in the Jefferson School District, Oregon DHS chose to treat the Warm Springs Reservation as a 10th SFA for purposes of tracking the consent letters and responses. Across these SFAs, the Oregon grant proposal reported that 51 percent of children qualify for free or reduced price meals.

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11 As grantees were deciding which local areas to include, they had to consider FNS guidance that Provision 2 and Provision 3 schools were excluded from the POC year. In these schools, all students receive free lunch without applying or being directly certified in the current school year. FNS chose to exclude these schools as student-level data on free and reduced price eligibility are not available. FNS may consider adding special provision schools in future years. For more information on Provisions 2 and 3, visit the FNS website at http://www.fns.usda.gov/cnd/governance/prov-1-2-3/Prov1_2_3_FactSheet.htm.

12 The grantee gave the tribal leaders some consent letters to distribute throughout the community to families that may not have received the letters through the mail. Mail is delivered through PO Boxes and many families that cannot afford a box share with other households or go without one.
Connecticut initially partnered with 23 SFAs, but 6 dropped out during the early months of implementation, leaving 17 SFAs. Four out of the 6 SFAs in Connecticut dropped out due to confusion about the program. In particular, 3 of those 4 sites thought they had to be eligible to participate in the SFSP to participate in SEBTC. The fourth SFA dropped out, despite interest in the program, because it was too difficult for it to identify eligible children. The last 2 SFAs did not contact the grantee to provide a reason. The Connecticut grant proposal indicated that among the original group of 23 SFAs, between 10 to 72 percent of children were eligible for FRP with more than half of the communities at approximately 30 percent. The two small urban areas (Norwich and Windham), which are in the catchment area and include almost half of the eligible children, have the highest percentages at 65 and 72 percent, respectively.

3. Availability of SFSP in Participating Areas

As discussed in Chapter I, the SEBTC Demonstration is supplementing the services offered through the SFSP. SFSP programs may be sponsored by school districts, local governments, residential camps, and private non-profits; each sponsor operates one or more feeding sites where children can obtain free meals (usually lunch). Sites may be located in various places such as schools, community organizations, parks, or playgrounds. Mirroring USDA’s 2003 report on SFSP implementation nationwide (Gordon and Briefel 2003), grantees reported that the SFSP reaches only a fraction of children certified for FRP meals in targeted local areas. Table II.2 provides statistics on SFSP availability and usage in each participating area. Although not represented in the table, it is noteworthy that only 7 of the 23 SFAs initially proposed for the demonstration in Connecticut have SFSP sites. Comparing Table II.1 and II.2, the number of FRP-certified children in the five sites ranges from 11,000 to 30,000, but the number of children served by SFSP on a typical day ranges from 944 to 8,251. This suggests a coverage rate of roughly 10 to 40 percent of those eligible.

Table II.2 Characteristics of the SFSP in Participating Local Areas

<table>
<thead>
<tr>
<th></th>
<th>Connecticut</th>
<th>Michigan</th>
<th>Missouri</th>
<th>Oregon</th>
<th>Texas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of SFSP sites in local area</td>
<td>55</td>
<td>35</td>
<td>143</td>
<td>44</td>
<td>30</td>
</tr>
<tr>
<td>Total number of SFSP meals served in 2010 a</td>
<td>94,634</td>
<td>128,124</td>
<td>390,774</td>
<td>78,056</td>
<td>119,634</td>
</tr>
<tr>
<td>Average daily SFSP attendance</td>
<td>944</td>
<td>1,696</td>
<td>8,251</td>
<td>2,520</td>
<td>2,604</td>
</tr>
</tbody>
</table>

Source: Grant proposals for Connecticut, Michigan, Oregon, and Texas, data provided by SFSP program administrators at the Missouri Department of Health and Senior Services, and data from the Michigan Department of Education website.

a Statistics presented for Missouri include all sites serving the Kansas City area and may cover some catchment areas outside of the three participating SFAs.

b Michigan data reflects sites operated by GRPS only. Other sites with Grand Rapids addresses appear to be camps located elsewhere or to operate outside the school district. The count of meals includes snacks. The Texas proposal explains that only breakfast and lunch is served through the program, thus snacks are not included. Data from Connecticut, Missouri and Oregon do not indicate whether snacks are included in the total count of meals.

C. Variants in the SEBTC Program Models

The POC grantees are offering SEBTC benefits either through SNAP or WIC EBT systems. Within that framework, grantees were charged with determining key features of their program model, including whether to administer benefits with existing or new EBT cards. Another key contextual factor is the length of the summer school vacation at the local SFAs. The grantees also
vary in their approaches to the nutrition education activities provided to households and the information provided to local retailers about the demonstration.

1. **Program Models**

FNS issued two separate RFAs to engage States to implement summer benefits through both the SNAP and WIC EBT systems. As discussed in Chapter I, Connecticut, Missouri, and Oregon were awarded grants to offer benefits using SNAP EBT systems, whereas Michigan and Texas were awarded grants to offer summer benefits through WIC EBT systems. The SNAP sites will issue $60 per month per child in SEBTC benefits on an EBT card using SNAP technology. The WIC sites will allow households to purchase specific packages of WIC-allowable foods that have a maximum cost of $60 per month using WIC EBT technology.

States that chose to use the SNAP system to issue benefits took one of two approaches: either to issue benefits on existing SNAP card (termed the SNAP-hybrid model) or issuing new, separate cards for both SNAP participants and non-participants (termed the SNAP model). Missouri and Oregon chose the “SNAP-hybrid” approach. For this approach, the State will issue $60 in benefits per child per month on existing EBT cards for participants already receiving SNAP benefits. Only households that do not receive SNAP will receive their SEBTC benefits on new EBT cards—identical in design to the SNAP cards. Connecticut is using the “SNAP” approach under which all SEBTC participants, regardless of whether they have an active SNAP EBT card, will receive $60 per child per month a new EBT card specifically designed for the demonstration.

The other two States—Michigan and Texas—are using WIC EBT systems (termed the WIC model). In these two States, SEBTC benefits will be issue on a new EBT card regardless of whether the household already has an existing WIC EBT card. Each household will receive one food package per child per month.

Connecticut, Michigan and Texas described similar reasons for their decision to issue benefits on new SEBTC cards, rather than existing EBT cards. Michigan views SEBTC as a totally separate program from WIC, and therefore never considered using the same WIC card for families that already receive benefits. Texas and Connecticut similarly felt that a new card helped create a separate identity for the SEBTC program. To avoid confusion with existing EBT cards, the new cards in Texas and Connecticut feature a new design and logo. In Texas, the new cards will be called “Summer Nutrition Cards,” and instead of the Lone Star logo that exists on WIC cards, SEBTC cards will feature a nutrition character from an existing promotional initiative. Connecticut is calling the SEBTC Benefit, “Summer Meals on the Move” to mitigate potential stigma associated with using a SNAP EBT card. Michigan did not create a new logo for the summer benefit card, but the card was updated to read “SEBTC” instead of “WIC” on the front.

The use of these three different models—SNAP, SNAP-hybrid and WIC—will enable the evaluation to make important comparisons. One major contrast is between the WIC and SNAP/SNAP-hybrid sites. As discussed in Chapter I, the WIC-approach allows the SEBTC recipient to use the card for only a list of allowable foods while the SNAP card can be used for a wider range of food purchases. It will be possible to make comparisons both about household
Chapter II: The Proof of Concept Grantees

shopping and spending behaviors as well as children’s dietary intake between the two approaches.\textsuperscript{13} It will also be possible to see differences in the value of benefits taken up by SEBTC recipients across approaches.

The study will also examine several other potential implications of using a SNAP or SNAP-hybrid approach. In the SNAP hybrid model, households who already have a SNAP EBT card may be more likely to access and draw down their benefits, given that their overall EBT balance will simply increase. They may, however, spend the benefit according to their normal spending habits, without a focus on the school-aged children in the household. Those households receiving new EBT cards containing solely the summer benefit may be less likely to use the card. However, those who do use the benefit may be more likely to purchase food for their school-aged children. Again, as in the case of the earlier comparison between the SNAP and WIC approaches, analysis of survey data, EBT transaction data, and qualitative information gathered from State and local staff members that interact with participating households will help shed light on these issues in future evaluation reports.

2. Length and Amount of the Summer Benefit

Given the nature of the program, the duration of SEBTC benefits is directly tied to the school calendars within the target area. In the spirit of offering food assistance when children do not have access to school meals, the selected households will receive benefits during the school summer vacation. The length of benefit period, therefore, will depend largely on when the 2010-2011 school year ends and the 2011-2012 school year begins.\textsuperscript{14} FNS provided guidance to States to issue benefits starting on the date that the first participating school lets out for summer and end benefits on the day when the last participating school begins session again in the fall.

The duration of benefits for the POC year ranges from 78 days in Missouri to 91 days in Michigan and Oregon, a difference of 13 days or approximately $25 in benefits per child. As shown in Table II.3, the earliest school ends its 2010–2011 session on May 31 in Missouri. The latest school returns for the new 2011–2012 session on September 9 in Michigan. The average length of benefits across all five grantees is 85 days, and the average benefit amount is $166 per child for the summer.

Identifying the start and end of summer benefits took longer than expected in many States and presented some challenges in determining the amount of the benefit in sites implementing the SNAP model. For some grantees, these dates were not finalized until early April. One reason for this delay was that multiple snow closings during a particularly harsh winter required days to be added to

\textsuperscript{13} Because of sample size limitations in the POC year, differences will have to be considerably large in the POC year in order to have statistically significant differences. In the full-demonstration year, with up to 15 grantees and a much larger sample, the evaluation’s power to detect differences between program models will go up significantly.

\textsuperscript{14} FNS specified in the RFA that “The State agency should determine the start and end dates of the demonstration project based on its particular circumstances, and explain those circumstances in its application. The SEBTC start date can be as early as the day after the last day of school for the first school that begins summer vacation in the demonstration area. Similarly, the end date can extend until the day the last school returns for the new school year. If possible, the State can stagger benefits based on a particular child’s summer vacation, but this is not required” (USDA/FNS 2010).
Table II.3 Length of the Summer Benefit

<table>
<thead>
<tr>
<th>State</th>
<th>Last Day of School 2010-2011 (range across schools)</th>
<th>First Day of School 2011-2012 (range across schools)</th>
<th>First Day of Benefits</th>
<th>Last Day of Benefits</th>
<th>Number of Summer Benefit Days</th>
<th>Total Amount of Summer Benefit per Eligible Child</th>
</tr>
</thead>
</table>

Source: Dates gathered during technical assistance efforts with the grantees. Amount of summer benefit calculated based on those dates.

* Oregon benefits were loaded onto EBT cards on June 1st; however, benefits were prorated based on the June 7th start of the summer.

the end of the school year. Due to the delay in setting final dates, agencies preparing to administer the benefit had to react to shifting school end dates up until the final weeks of the 2011 school year. Per grant requirements, benefits for any partial months will be prorated under the SNAP model.15 One State that did not plan to prorate its monthly benefits was required to prorate the last month due to the final school start dates.

While WIC sites did not prorate for partial months, the cost of foods specified in the WIC package is emerging as a potentially important issue. FNS approved a WIC package for the SEBTC Demonstration that was valued at $60 based on national averages of food prices. However, prices vary by State. In addition, one of the two participating States using the SEBTC WIC model requires participants to select the least expensive brand of some food items for purchase with WIC EBT cards. As a result of this and other policies, the food package costs were less than the national average. Some stakeholders among the grantees using the WIC approach expressed worry that benefit recipients would be disappointed to learn that the cost of the WIC benefit was actually less than $60 a month as stated in outreach materials. Analysis of EBT transaction data, which will be presented in future reports, will show the actual cost of benefits redeemed by SEBTC participants in the two sites using the WIC approach.

3. Nutrition Education Activities

Beyond the EBT benefit, three grantees also planned nutrition education activities. Although more information will be collected during subsequent rounds of evaluation site visits, grantees provided information on this topic during the first technical assistance visit, where they described early activities and plans for further nutrition education efforts. Oregon’s grantee agency has mailed informational folders to all households determined eligible for the summer benefit, including those selected and not selected to receive the benefit. These nutrition education materials were

15 This prorating requirement was not applied to the WIC model sites, because prorating the food package quantities would cause too much confusion. Instead, participants are issued the same food package quantities per child each month, but the benefits expire on the first day of school.
previously developed by Oregon State University’s Extension Service and will focus on messages from the Dietary Guidelines for Americans and tips to stretch your dollar. Michigan’s Department of Education will post nutrition education on its website, which includes a modified version of the department’s WIC nutrition education materials with a focus on how to choose WIC foods such as fruits and vegetables. In Missouri, the Local Investment Commission used grant funds for SEBTC promotion as part of a large-scale nutrition fair in March that was open to the whole community. About 300 people attended the fair. Among a range of activities, blood pressure and blood cholesterol screenings were available at the fair. In Texas, the West Texas Food Bank incorporates WIC nutrition education materials in its training for participants and plans to provide a cooking demonstration and other nutrition education as part of a kickoff event for participants in June. Connecticut had planned to include nutritional information on the EBT card carrier, but due to limited space was considering whether to include this information instead on the notification letters to the benefit group.

4. Providing Information to Local Retailers

It is generally perceived by all grantees that retailers will easily adapt to the SEBTC and will require little or no extra training to accept the benefit. Two of the grantees, Oregon and Connecticut (both of whom have SNAP-based models), had minimal or no plans for retailer education. This reflects their perceptions about how similar the SEBTC purchase process is to the current SNAP EBT purchase process. None of the five grantees expressed great concern that retailers would experience a spike in food purchases as a result of the demonstration benefit.

The other three grantees (Michigan, Missouri and Texas) used a range of techniques during early implementation to update retailers about the demonstration. Missouri issued newspaper articles, posted information in two Statewide SNAP retailer newsletters and a city retailer newsletter, and met with a city Retail Grocers Association to encourage training of store managers and clerk. Similarly, Michigan and Texas issued messages in their Statewide WIC retailer newsletter and planned to provide additional communications and training. Michigan plans to email and train WIC retailers before the start of the summer on how the SEBTC card will look different, the fact that cashiers will only need to press the WIC button to check out SEBTC foods, and the fact that some families with cards will be new to WIC benefits. Texas sent a letter about the demonstration to all WIC vendors in the project site, and plans to conduct three training sessions in May for store managers, training staff, and other personnel. The training will include: how the pilot program will work, eligible participants and WIC food items, processing of purchases, dates of operation, and how the program will bring additional business to WIC vendors. Texas had initially planned to amend the WIC Vendor Contract. However, the agency determined that a notification would be sufficient because SEBTC vendor rules follow the existing WIC rules.

D. Summary

Although the benefit for both the SNAP and WIC models was exactly specified by FNS, there is a great deal of variation in the partnerships developed by the grantees, the demonstration areas they chose, and the period when benefits will be available. Although most States proposed the agency that administers SNAP or WIC to serve as the official grantee, they all engaged other State partners and local organizations in the complex process of administering these new benefits. The number and size of SFAs involved in the process also had implications for both coordination and consistency of procedures, as discussed in later chapters. These important features provide critical context for understanding the experiences of the five grantees during this POC year.
III. IDENTIFYING ELIGIBLE CHILDREN AND HOUSEHOLDS

As a first step in implementing the Summer EBT for Children (SEBTC) Demonstration, grantees and SFAs identified children who qualify for FRP meals and therefore are eligible for the summer benefit. After those children were identified, they had to be aggregated into households. These household-level records were needed for three purposes: (1) the initial mailing to obtain household consent for participation in the demonstration, (2) random assignment into the demonstration, and (3) sampling and contacting households for the evaluation. The speed and complexity of this process were highly influenced by the types and quality of data available from the districts, as well as the level of sophistication of their management information systems (MISs).

The success of the SEBTC demonstration and its evaluation rides on the ability of grantees and their partners to develop accurate lists of eligible households and ensure that contact information is up to date. Even if the demonstration were not being rigorously evaluated, this step is critical. If grantees are successful in these tasks, the full eligible population has a chance to participate in the demonstration and, if selected, that benefits, in the correct amounts, actually can be issued to them. For the evaluation, correct listings of households and contact information is essential both for random assignment and also to enable high response rates for the survey, which is the principal source of outcome data. For these reasons, this chapter discusses in some detail these early implementation steps. It starts by discussing the process of creating lists of eligible children and then turns to describing how children were grouped into households.

A. Developing Lists of Eligible Children

Key considerations in developing lists of eligible children were the definition of eligibility, the available data sources, and the number of eligible children. While many SFAs had planned for this process and were readily able to identify eligible children, almost all encountered unanticipated questions and challenges along the way. This section describes how the process unfolded during early 2011.

1. Definition of Eligibility

When the SEBTC grant application process began in fall 2010, FNS specified three eligibility requirements for children to receive benefits as part of the SEBTC Demonstration:

- Residing in the demonstration area
- Enrolled in kindergarten through 12th grade
- Certified for free/reduced price (FRP) meals in the 2010-11 school year.

As the demonstration was implemented, grantees asked questions regarding the eligibility of specific student populations, including graduating 12th graders and children enrolled in pre-

16 If a child is determined eligible under these rules, FNS specified that other school-aged children in their household can also become eligible for benefits. For example, sites identified instances when a sibling attended a private or charter school and were able to provide SEBTC benefits to the household for both children.
kindergarten. In addition, as the process of determining eligibility ensued, grantees raised questions about other groups of children that are eligible for FRP meals, including children enrolled in foster care, homeless youth, and emancipated youth.

The RFA stipulated that “each household selected to participate in the treatment group will receive benefits for all children in the household who are certified for free and reduced priced school meals at the end of the 2010/2011 school year” (USDA/FNS, 2010). The RFA also indicated that “all grades (K–12)” are included but that year-round schools were to be excluded from the demonstration.

The implication of the first statement is that 12th graders certified for FRP meals and graduating at the end of the 2010–2011 school year were eligible for benefits. Some of the grantees sought affirmation of this policy, as these children would no longer be students in the following summer. Many would be age 18 or older and potentially no longer living in the households of their guardians when the SEBTC benefits would be issued. FNS confirmed to the grantees that 12th graders were eligible according to program rules.

Questions also emerged about the eligibility of those enrolled in participating SFAs’ pre-kindergarten programs. In mid-February, FNS instructed the grantees that pre-kindergarten children were eligible for the benefit as long as they were attending participating schools. These children did not need to be enrolled in the NSLP or SBP but could be receiving subsidized meals from another program, such as the Child and Adult Care Food Program. Pre-kindergarten children were not eligible if they were enrolled in a pre-kindergarten, Head Start, or child care program that was not part of a participating school, even if they received subsidized meals at that program.

Having received the guidance from FNS on the inclusion of demonstration site pre-K students, four grantees made plans to include them. One grantee had already mailed its initial consent letters and felt it was too late to try to include pre-K children. However, the grantee found that several households included Pre-K children on the consent forms because the consent form asked parents to indicate all of their children and the schools they attended. The grantee decided to include the Pre-K children from the forms in the final file for random assignment. All Pre-K children were included if they attended a program at an eligible school. Eligibility of homeless youth and emancipated youth was also raised as an issue by some grantees. FNS deemed that both of these populations were eligible for the benefit. To the extent necessary, the grantees then worked with SFAs to ensure that procedures to accommodate the special needs of these children were in place.

2. Data Sources for Lists of Eligible Children

SFAs from all five grantees were readily able to identify children within their demonstration areas that were eligible for the benefit. The children certified for FRP meals included those in households with approved NSLP applications; those who were directly certified because of household participation in SNAP, TANF, or Food Distribution Program on Indian Reservations (FDPIR); homeless children; and children in foster care approved by separate NSLP applications. Data sources on the eligible children included school nutrition program databases (NSLP applications, direct certification files and reports, homeless student lists) and student records maintained for educational purposes.
The school nutrition program database was the core data source in each SFA. Access to other school records data varied. In Michigan and in one SFA in Missouri, this database was an integrated part of the district student records system. Texas and two SFAs in Missouri linked the school nutrition program databases to the student records systems to pass through updated information on variables such as parent/guardian name, address, telephone number, and children’s dates of birth and school assignment. In Connecticut, where the SFAs ranged greatly in the number of children certified for the program, as well as the sophistication of each one’s MIS, the process varied greatly. In Oregon, the school nutrition program database was separate from the student records database.

3. Number of Eligible Children

As described in Chapter II, two of the grantees, Connecticut and Oregon, anticipated numbers of eligible children in the demonstration sites that were close to FNS’ minimum guidelines of 10,000 to 12,000 children. The other three grantees had substantially more eligible children. Table III.1 provides the approximate numbers submitted by the SFAs after data-cleaning efforts.

In Texas, there was a series of discussions about the size of the demonstration area. The State chose the Ysleta Independent School District (YISD) as the site. This district had over three times the number of eligible children specified by FNS as the target size. The State’s initial plan was to include only part of the district in the demonstration, but the YISD school board wanted all children in the district to have an equal opportunity to be selected for the benefit. The State’s final proposal indicated that if FNS did not want the whole district included, the State would work with FNS and the evaluation team to devise a solution. Based on a determination that the State had the resources for YISD to send consent letters to all households in the district, FNS approved a plan to include the whole district.

Table III.1 Estimated Numbers of Eligible Children and Households

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Approximate Number of Eligible Children Identified</th>
<th>Approximate Number of Eligible Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>11,117</td>
<td>8,011</td>
</tr>
<tr>
<td>Michigan</td>
<td>16,417</td>
<td>10,603</td>
</tr>
<tr>
<td>Missouri</td>
<td>19,745</td>
<td>10,864</td>
</tr>
<tr>
<td>Oregon</td>
<td>12,758</td>
<td>8,923</td>
</tr>
<tr>
<td>Texas</td>
<td>38,291</td>
<td>20,236</td>
</tr>
</tbody>
</table>

Source: Approximate numbers of eligible children provided by grantees based on children certified for FRP in the school year. Approximate numbers of households extrapolated by the evaluation team, based on lists of consenting children and households.

17 School district enrollment records typically include student name, date of birth, mailing and residence address, parent or guardian, and demographic data (such as race and economically disadvantaged status). These records are based on information provided by parents or guardians when students are enrolled and at other times when updates are provided. Depending on the district’s information system, these enrollment records may be integrated with or separate from the information maintained by school nutrition programs on the eligibility of students for FRP meals and on student accounts used to pay for meals.

18 In Oregon, although information from the student records data base was adequate for issuing the benefit, the evaluation team requested additional information about eligible children and households in order to address issues such as non-response bias. As a second step, the grantee is going to go back to the SFAs and request additional information.
B. Grouping Eligible Children into Households

After children were identified, SFAs worked with the grantees and the evaluation team to develop lists of households. This process took substantial time and effort. Many of the participating SFAs did not anticipate the complexity of this process and therefore spent more time and resources on this task than initially expected. In some cases, State agencies, SFAs and partners had to leverage other funding resources to support these activities, as the resources were not included in the grant budget. Complicating the process were the various definitions of households, the sources of data at participating SFAs, and the quality of available data.

1. Definition of Household

The SEBTC Demonstration’s definition of a household is guided by the NSLP definition:

Household composition for the purposes of making an eligibility determination for free and reduced priced benefits is based on economic units. An economic unit is a group of related or unrelated individuals who are not residents of an institution or boarding house but who are living as one economic unit, and who share housing and/or significant income and expenses of its members. Generally, individuals residing in the same house are an economic unit. However, more than one economic unit may reside together in the same house. Separate economic units in the same house are characterized by prorating expenses and economic independence from one another.19

The SNAP household definition is similar, but more focused on meals:

Everyone who lives together and purchases and prepares meals together is grouped together as one household….Some people who live together, such as husbands and wives and most children under age 22, are included in the same household, even if they purchase and prepare meals separately.20

Applications for FRP meals identify the households to which some eligible children belong, but other children are approved individually by direct certification or from homeless student rosters. For these children, most SFAs did not have an identifier linking them to a household or an economic unit. This complicated the process of developing household lists.

2. The Process of Developing Household Lists

In all of the demonstration areas, the attempt was to construct household lists using the best information available from SFA records. As discussed in Chapter 4, grantees had the choice of either using active consent (where guardians “opt in” to participate in the demonstration) or passive consent (where guardians must contact the SFA to “opt out”). In the three active consent sites, families either reviewed and approved the information on record or filled in new consent forms completely. In the two passive consent demonstration areas, by definition, no initial response was


required from guardians that wanted an opportunity to receive the benefit. As a result, in these two demonstration areas, the construction of accurate households was dependent on the quality of the data from the SFAs and the programming capabilities of the grantee or its partner agency.

• In two States, SFAs constructed lists of eligible children and households with very general guidance from the grantee. Although all relied on their NSLP eligibility databases for identifying children, there was variation across SFAs in how households were compiled. For instance, the participating SFAs in one State varied in the level of sophistication of their school records system and did not assemble household lists uniformly. One of the larger SFAs matched the NSLP participation list from their “point of sale” database with their school information system to obtain additional data for consenting households, including race and telephone numbers as required for the demonstration. Other SFAs relied on their FRP lists to identify eligible children. In the other State, most of the SFAs generated household lists from the school nutrition program database and then downloaded the data into Excel to remove any duplicate households. Duplicates often occurred because a family would submit an NSLP application and the child would also be directly certified.

• In a third State, the participating SFA was perhaps the least challenged in the process of developing lists of eligible households. This SFA has a sophisticated student records system that combines data from school records, NSLP/SBP applications, and direct certifications. The records system includes a household identifier and a “family code” variable that was used to create the households of eligible children. This family code variable is defined and managed by the school secretaries as data are entered at enrollment or updated. Other school records data are collected upon school enrollment. Parents are encouraged to, but often do not, update these data annually.

• In another State, a grantee partner was responsible for creating the household-level data files from child-level files provided by participating SFAs. Only two of the SFAs had school records that included a family code variable, which was used for the construction of the list. When family codes were not available, the grantee partner had to create households by matching addresses as accurately as possible.

• In the last State, the participating SFA separated its child records into three files. The first file included children with NSLP applications, the second file was of directly certified children, and the third file was children certified from the homeless roster. Each file was processed separately into households. For the file of NSLP applications, applications were at the household level, so all children with the same application ID were combined into a household. Directly certified children were sorted on addresses and names and then manually grouped into households. The data processing clerks separated children and families living at the same address if the parent/guardian data were different. With no way to confirm that these households were separate economic units, and because of concerns about equal treatment of all children in the same housing unit, a later process by evaluation staff combined children into households based on address for random assignment.

3. Challenges in Forming Household Lists

Grantees faced two main challenges when forming household lists. The first challenge was deciding when multiple families should be considered as one household. The evaluation team decided it was important to preclude the possibility that a household made up of more than one
family was inadvertently separated and therefore only part of the household would potentially receive the benefit. For this reason, when the team received lists of households from passive consent sites, all children at the same address and unit were kept together as one household for the purposes of random assignment. Therefore, all families at that address would be assigned to receive the benefit or not to receive it. In these sites, grantees could subsequently decide whether to issue one or more EBT cards, based on additional information obtained from State record systems or directly from guardians. In active consent sites, guardians provided lists of children in their household on the form or confirmed that the information provided was accurate. As a result, the risk was much less of inadvertently splitting up households.

The second challenge was dealing with the unique characteristics of data from NSLP applications versus data from direct certification. Households certified through an NSLP application include all children on a single application. Therefore, SFAs could group children into households using the application, regardless of whether or not their school records system included a family code. Although in some cases, more than one application was submitted per household.

However, NSLP records on children who are directly certified for FRP meals based on their SNAP and TANF status did not usually include a family code. Although SNAP and FDPIR records group children into households, the agencies providing these records do not routinely share a household identifier with school districts. If the SFA’s school records system did not include a household ID, assembling children into households was much more challenging.

The experience in one State illustrates the problems that arose from processing data on directly certified children into households. As noted above, the SFA had three distinct data files derived from NSLP applications, direct certification, and the homeless children list. The site first had to deal with inconsistencies and nonstandard formatting in the school records data, making it difficult to electronically combine records based on address. Instead, the child records needed to be grouped through a manual review process. Next, the site discovered incomplete information, such as apartment numbers, phone numbers, and guardian names. Ten percent of the households were missing guardian names and only a handful of the 30,000 records included road types (Avenue, Street, and so on). It was difficult to eliminate duplicate records when some of the necessary information was missing. Finally, a number of households had children in the NSLP application file and other children in the directly certified file, so the final file combining these sources had duplicate records. To the degree possible, these duplicates were identified when the evaluation team reviewed the file of consenting households prior to random assignment.21

4. Issues with Data Quality

Most grantees had issues with data quality that affected the ability to create the household-level records. In all cases, the evaluation team worked with the grantees and SFAs to resolve as many data issues as possible before random assignment given the timeframe for implementation. Several types of data quality issues were encountered.

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21 In the next phase of implementation, it will be possible to determine the degree to which efforts were successful in eliminating duplicate information and constructing households adequately, as the household list will be used both for issuing the EBT cards as well as contacting households that will be participating in the evaluation.
Out-of-Date Information. Contact information could come from consent forms for active consent sites, school records, school nutrition databases, or, for directly certified children, from the SNAP system. Based on results from consent mailings (discussed in detail in Chapter IV), it appears that for some of the SFAs in the demonstration areas, the most recent information on file was not always known and/or used.

Developing Uniform File from Multiple Files. In some cases, when a grantee or its partners assembled lists from multiple SFAs or multiple lists from a single SFA, there were challenges because fields were not standard across the lists and/or there were duplicate listings of children that were not easily identified because of slight data irregularities.

Data Entry Errors, Inconsistencies, and Incomplete Data. In some cases, school records were the source of the contact information for consenting households. SFAs varied in the degree of the quality of these records, often with local school staff not entering data into the system uniformly or accurately.

5. Identifying Households for Children in Group Homes or Homeless Shelters

Four of the five sites noted that special procedures were needed to make sure homeless children and those living in group homes were included in the SEBTC Demonstration. The procedures for identifying these children and clustering them into households varied substantially, as the following two examples illustrate.

One State's data file grouped all children at the same address into a household, including all children living in the same apartment building or the same homeless shelter. However, when the State matched these cases to their database on SNAP, Medicaid, and TANF cases, they used data from that system to populate the fields on guardian name and address when possible to administer the benefit appropriately. By this procedure, most of these cases were likely split apart to reflect the true household configurations of these children.

In another State, its data files included one known shelter address and homeless children were identified and confirmed by a school liaison. The homeless child list did not include parent/guardian information. Staff attempted to group homeless children into families for the household file. Staff sorted the homeless children by name, and based on other data, including student IDs—which would be sequential if the children were siblings entering the school district at the same time—combined some homeless children into households. However, most homeless children were treated as separate households for the consent mailing.

6. Guidance to SFAs Regarding Construction of Household Files

Management of data needs from the SFAs, particularly for the household-level files, proved to be challenging for grantees with multiple SFAs in the SEBTC Demonstration. Because those data files fed into the initial consent mailings, identifying the eligible children and their households was a key step in the process of gaining consent and implementing the demonstration. In Michigan and in Texas, only one SFA was involved with the demonstration, and these SFAs were integrally involved in the initial phases of the project. Guidance and follow-up on the construction of the household files was easily directed to SFA staff responsible for data management.

For the grantees with multiple SFAs, guidance was not always clear or relayed in a timely manner to all SFAs. As a result, information technology staff in some SFAs did not always know the
purposes of the list construction. They therefore did not consider ways to check for duplicate records or clean their data files before submitting them. Staff in other SFAs misunderstood program rules, believing that some children were not eligible when they were or vice versa. This resulted in some inconsistencies in the types of children included in the lists for obtaining household consent for the demonstration. It also required additional time and resources from the grantees and evaluation team to process and clean the data.

C. Summary

Many lessons were learned by the grantees and the evaluation team as they compiled lists of eligible children and formed household groupings. To improve the process for next year, the evaluation team will provide more explicit guidance on the construction of lists. In addition, wherever possible, the team will work directly with participating SFAs instead of going through grantees or intermediaries. In the POC year, in cases where there were multiple SFAs, the team communicated about problems with the grantee, who in turn contacted staff at the SFA. This process lengthened the amount of time it took to resolve issues and sometimes led to misinformation. The team is also exploring data forms and other tools that can be provided to grantees to minimize out-of-range errors and duplicate entries.
IV. CONSENT, RANDOM ASSIGNMENT, AND NOTIFICATION OF HOUSEHOLDS

Random assignment is the cornerstone of the impact evaluation of the Summer EBT for Children (SEBTC) Demonstration. The use of random assignment ensures that any differences observed between children and households assigned to the benefit group and non-benefit group can be attributed to the SEBTC benefit with a known degree of statistical precision. To complete random assignment, however, SFAs had to obtain consent from eligible households to participate in the demonstration and release their data to the grantee and evaluator. This chapter describes the steps that were taken by the grantees and the evaluation team to achieve that goal. Specifically, it provides detail about the steps of obtaining consent from eligible families, implementing random assignment, and notifying families about their assignment.

A. Overview of the Consent Process and Follow-up Process

To issue the benefit and evaluate its impact, the SEBTC Demonstration requires that SFAs obtain consent from households to participate in the demonstration and to release contact information to the grantee and evaluator. This stage must be completed before random assignment of selected households to receive the benefit, followed by a second round of random sampling of households from the benefit and non-benefit groups to participate in the evaluation. For this process, the RFA for the demonstrations made it clear that maintaining the confidentiality of contact information was critical. It stated the following:

The first priority of the awardee with respect to this information is protecting household confidentiality. The law governing the School Meal Programs, the Richard B. Russell National School Lunch Act, places limits on the disclosure of free and reduced price information. Although an individual child’s free or reduced price status may be shared with other Federal nutrition program administrators (such as SNAP), the law does not authorize release of household contact information for these children without first obtaining the consent of the child’s parent or guardian. Therefore, for purposes of the SEBTC, the SFA or school(s) participating in the demonstration project must be the entity that makes the first contact about the demonstration project with the households of children certified for free and reduced price meals (USDA/FNS 2010).

Initially, all of the grantees believed that the above language indicated that an “active” consent process needed to be implemented before household contact information could be sent to the grantee and the evaluator. For the active consent process, guardians were sent letters describing the demonstration. Those who chose to “opt in” returned forms indicating that they wanted the opportunity to receive the SEBTC benefits and were willing to share their information for the evaluation.

Guidance provided by FNS in January 2011 indicated that passive consent was also acceptable, and Missouri and Texas decided to use this approach. In the passive consent process, SFAs could send letters to guardians, who were given a deadline by which time they must return a form to “opt out” of the demonstration and evaluation; that is, refuse to let their contact information be released to the grantee and the evaluator. In the passive consent process, when letters to households were returned by the post office as undeliverable, households were removed from the list before sharing household lists with the evaluation team.
The grantees were responsible for managing the initial consent process without direct oversight and approval by the evaluation team. However, before the evaluation team could receive any personally identifying data from the demonstrations, the Abt Institutional Review Board (IRB) required that grantees assert that they had met all applicable federal, State and local requirements regarding sharing of confidential information with the team. This language was incorporated into memorandums of understanding (MOUs) between Abt Associates and the grantees. These MOUs more generally documented the roles and responsibilities of the evaluation team and the grantee. The Abt IRB also required the consent notices to contain specific information about the evaluation.

Table IV.1 provides a brief overview of the consent and random assignment process for each of the grantees.

**Table IV.1 Overview of the Consent and Random Assignment Process**

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Active or Passive Consent</th>
<th>Final Number of Participating SFAs</th>
<th>Consent Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>Active</td>
<td>17(^a)</td>
<td>17 SFAs developed household lists and sent consent letters to eligible households. Households sent forms back to SFAs, which then, in turn, sent lists of consenting households to the grantee, who then shared it with the evaluator for random assignment.</td>
</tr>
<tr>
<td>Michigan</td>
<td>Active</td>
<td>1</td>
<td>SFA developed the household list and mailed the consent letters. Households sent forms back to SFA, which in turn developed the final list and shared it with the evaluator for random assignment.</td>
</tr>
<tr>
<td>Missouri</td>
<td>Passive</td>
<td>3</td>
<td>The 3 SFAs developed lists of eligible children and provided them to LINC, a local community-based organization, which used the information to construct the list of eligible households. LINC sent letters to eligible households then removed families that opted out and/or whose letters were returned undeliverable, and sent the final list to the evaluator for random assignment.</td>
</tr>
<tr>
<td>Oregon</td>
<td>Active</td>
<td>10</td>
<td>The 10 SFAs developed household lists and sent consent letters. Parents returned consent information to the grantee, which then compiled a master list. To obtain the required number of households for the demonstration, the grantee sent a second mailing to all households in the local area that were receiving SNAP and had school-aged children. The final list of consenting households was then shared with the evaluator for random assignment.</td>
</tr>
<tr>
<td>Texas</td>
<td>Passive</td>
<td>1</td>
<td>The SFA developed a household list and sent the letters. The SFA then stripped the households that opted out (no letters were returned by the post office(^b)) cleaned the list and shared it with the evaluator for random assignment.</td>
</tr>
</tbody>
</table>

Source: Evaluation technical assistance efforts with demonstration grantees.

\(^a\) Initially 23 SFAs agreed to participate in the evaluation, but 6 SFAs dropped out during the consent process.

\(^b\) More discussion of the lack of returns from the post office is discussed in section B.

LINC = Local Investment Commission; SFA = school food authority; SNAP = Supplemental Nutrition Assistance Program
Although the SFAs in all of the demonstration sites were responsible for developing at least the lists of eligible children, there was substantial variation in subsequent steps:

- **Construction of Household Lists.** In four of the five sites, participating SFAs were responsible for constructing the household lists; in Missouri, however, LINC, the local intermediary, was responsible for that step.

- **Amount of Required Information in the Consent Process.** As discussed more below, grantees varied in the amount of information that they requested from guardians, with Michigan allowing guardians to review prepopulated forms of existing information from student records files to Texas requiring guardians to provide names, dates of birth, and school ID information.

- **Return of Consent Information.** Parents returned consent information to SFAs in three of the demonstration areas (Michigan, Texas, and Connecticut), whereas consents were collected by either the State (Oregon) or the local intermediary (Missouri) in two other demonstration areas.

After random assignment was complete, grantees had to notify households of their assignment. In two States, Connecticut and Texas, additional steps were required before benefits could be issued to the demonstration households.

- **Notification of Random Assignment Results.** All grantees sent letters to households assigned to receive the benefit, informing them of their selection. Four of the States also informed households in the non-benefit group that they were not selected for the demonstration.

- **Obtaining Additional Information After Consent Was Received.** Texas and Connecticut needed to obtain additional information from households selected to receive the benefit before it could be issued, but this was not the case for the other three grantees.

- **Receiving Benefit Cards.** In Oregon and Missouri, the SEBTC benefits will be loaded onto existing cards for those SEBTC participants who have active SNAP EBT cards. For households in these demonstration areas that need new cards, and for all households in Michigan and Connecticut, the benefit cards will be mailed to respondents, along with instructions on how to activate them. In Texas, families will be given the cards when they come to a training session on using the cards that is being conducted by the West Texas Food Bank.

### B. The Consent Process

Most grantees had not previously worked on initiatives requiring consent from guardians for participation in special programs, and therefore many encountered unanticipated problems. Even so, all grantees were successful in obtaining consent from enough households to achieve desired sample sizes for the evaluation.

A robust consent process is important for both the demonstration and the evaluation. From the perspective of the demonstration, it is fundamentally important the parents understand the consent materials so they can decide whether they want to participate and act accordingly. If parents do not understand the materials, it is possible that they will be issued a SEBTC card even if they do not
want one and may not take up the benefit. From the evaluation perspective, a high consent rate means that consenting households are more likely to represent all eligible households.

1. Development of Consent Materials

While the household lists were being constructed, each grantee developed consent materials that included a description of the program and the random assignment process. The consent letters also asked for permission from the guardian to have his or her household information released to the evaluator and the grantee. Information regarding the release of information to the evaluation team was standardized and approved by the Abt IRB. Although the evaluation team provided comments about the readability and accuracy of the information in the letter, particularly as it pertained to the evaluation, each grantee was ultimately responsible for both the letter and the consent process. All of the grantees had a thorough internal review of the letters and consent materials.

Appendix B includes copies of the consent materials. They varied in reading level (using the Flesch-Kincaid scale with agency names eliminated) from grade 6.5 to grade 10.6. Although it is desirable to keep reading levels in consent materials for low-income populations as close to the fifth grade level as possible, grantees were challenged by the need to create letters that were short in page length yet conveyed complicated information. Another consideration for at least one site was keeping the tone of letters consistent with other communications from the SFAs. Most of the grantees made efforts to make the letters as comprehensible and inviting as possible, including using multiple colors and logos. Two of the letters were put in a question-and-answer format to make the information more user friendly. All grantees prepared consent letters and forms in both English and Spanish.

The information requested by the grantees in the consent materials varied to some degree. Missouri, a passive consent site, included a tear-off form that a parent needed to send back in order to opt out that asked only for guardian signature. Texas, the other passive consent site, asked parents that opted out to provide their names, their children’s names, grades, dates of birth, and school identification numbers on the opt-out form, which was on the reverse of the consent letter. In the consent materials, Connecticut asked parents wanting to opt in to fill in their names, their contact information, their children’s names, and whether the children would be living with them during the summer, whereas Michigan provided parents with a prepopulated form and asked parents to confirm that the information the school district had on file was correct. Oregon asked guardians to provide their own name and contact information, their date of birth, and their children’s names, dates of birth, gender, and the names of the schools attended.

In Missouri, LINC shared a draft of the consent letter with 88 families to get their feedback. Most parents said that the letter was easy to understand (95 percent) and that they were interested in the program (84 percent). Common questions related to eligibility and program rules, the selection process, and how participation in SEBTC would affect taxes and other benefits. The grantee and LINC used these questions to develop a set of FAQs for use after the letter was distributed.

Even though most grantees tried to make letters and consent materials as user friendly as possible, some families may still not have fully understood the materials. LINC reported that, even with all of its work in developing the consent materials, it received a few telephone calls from families who sent back the “opt-out” forms with the belief that they were actually opting in. There is no way to know how many households across sites misunderstood the letters.
2. Outreach to Obtain Consent

All grantees, whether they used the opt-in or opt-out approach, achieved the needed number of households so that the benefit could be issued to 2,500 children, and so that there were enough additional consenting households to ensure that 2,000 households (from both the benefit and non-benefit group) could be asked to participate in the evaluation. The rate of consent for the opt-in grantees varied somewhat. In Michigan, 37 percent of eligible households gave consent, representing 47 percent of eligible children. In Oregon and Connecticut, household consent rates were 24 percent and 29 percent respectively, accounting for 36 percent and 38 percent of eligible children. (Table IV.2). It is possible that the consent rate could have been higher in at least Oregon and Connecticut, if more efforts had been made to reach out to eligible families and encourage them to participate in the demonstration.

<table>
<thead>
<tr>
<th>Passive Consent Grantees</th>
<th>Approximate # of Eligible Households and Children in Demo Area</th>
<th>Total and Percentage Opting Out</th>
</tr>
</thead>
<tbody>
<tr>
<td>Missouri</td>
<td>10,864 households with 19,745 children</td>
<td>191 households (2%) with approximately 2% of eligible children; 9% had letters undeliverable</td>
</tr>
<tr>
<td>Texas</td>
<td>20,236 households with 38,291 children</td>
<td>313 households (1%) with 500 children (1%); No letters were returned undeliverable</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Active Consent Grantees</th>
<th>Approximate # of Eligible Households and Children in Demo Area</th>
<th>Total &amp; Percentage Opting In</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>8,011 households with 11,117 children</td>
<td>2,383 households with 4,244 children (30% of eligible households; 38% of eligible children)</td>
</tr>
<tr>
<td>Michigan</td>
<td>10,603 households with 16,417 children</td>
<td>3,965 households with 7,709 children (37% of eligible households; 47% of eligible children)</td>
</tr>
<tr>
<td>Oregon</td>
<td>8,923 households with 12,758 children</td>
<td>2,141 households with 4,452 children (24% of eligible households; 35% of eligible children)</td>
</tr>
</tbody>
</table>

Source: Data obtained through technical assistance efforts and files submitted by grantees for random assignment.

The grantees that used the active consent process also varied in the degree to which they employed outreach strategies to maximize consent. Michigan was one of the more active grantees. Grand Rapids Public Schools sent an initial set of forms home with the household’s youngest child because they believed mothers are more likely to check backpacks of younger children than those of older children. Teachers and school food service staff talked to the children and encouraged them to bring back the form. The night before the forms were sent home, an automated call system was used to alert parents to expect the package the next day. The grantee also held a press conference, and stories were aired on at least two local television stations. In addition, a local food pantry was very involved in encouraging parents to send in consent forms.

In one State, SFAs varied in the degree of effort made in the consent process. Although some of the SFAs only sent out the initial mailing, others did more. One SFA, which achieved one of the highest consent rates, sent a second consent letter home and put it in a colored envelope to try to get the parents’ attention. The staff person then called all the nonresponders during weeknights of
Chapter IV. Consent, Random Assignment, and Notification of Households

college basketball's NCAA tournament, “March Madness,” assuming parents would be home watching the games, to encourage parents to return the forms.

In another State, the initial mailing failed to achieve the targeted number of households needed to issue the benefit and participate in the evaluation. The grantee sent a second mailing directly, instead of going through the SFAs, to SNAP households in the demonstration area because they were directly certified for FRP meals by virtue of SNAP eligibility. Together the two mailings were sufficient for the grantee to reach the minimum target number of households.

In the passive consent sites, a very small proportion of parents actively opted out (2 percent in each State). In addition, approximately 10 percent of the letters to potential participants in one State were returned as undeliverable by the post office. The number of undeliverable letters in the other State is unknown; no letters were returned by the post office as of mid-May. It is highly unlikely that all letters in the mailing got to their intended destinations. As further evidence of the potential problem of undelivered mail, several benefit group families contacted during the notification process (described in Section E) indicated that they had never received consent letters. Also in both sites, a small number of households opted out after the deadline. These households were removed from the file for random assignment.

C. Random Assignment

Once the list of consenting households was submitted by the grantee, the evaluation team used random assignment to select the benefit group from the list of consenting households with children eligible for SEBTC. The remainder of the consenting households, those not selected as the benefit group, comprised the non-benefit group. Random assignment guarantees that there are no systematic differences between the benefit and non-benefit groups, thus making it possible to compare the outcomes of the two groups to generate an estimate of the impact of the SEBTC. However, the success of random assignment and the evaluation is in part dependent on the quality of the list from which random assignment is conducted. As discussed earlier, all demonstration sites faced challenges in compiling the list of consenting households with children eligible for SEBTC. Therefore, the evaluation team collaborated extensively with the demonstration sites to compile the most accurate list of eligible households and children before random assignment could occur. This effort took two to four weeks in each demonstration site.

After the household list from each site was cleaned adequately, the process for randomly assigning households into the benefit and non-benefit groups was carried out in five steps. These five steps were completed in four to five days for Texas and Missouri, the passive-consent sites, and in one to two days for Michigan, Oregon, and Connecticut, the active-consent sites. Most of the time and effort of the random assignment team was spent creating the final household list, the first step, because potential duplication of households could not be fully resolved by the demonstration sites, particularly the passive-consent sites. The rest of the steps—stratification, random assignment, balance testing, and benefit file creation—were fully automated and standardized and were carried out promptly after final file creation.

1. Final Household List Creation

The initial file review process discussed earlier removed many duplicates. However, the potential for duplicates remained because the data quality could not be further improved. For the integrity of the evaluation, it was crucial to minimize the chance of assigning one part of a household to the benefit group and another part to the non-benefit group. Therefore, for the
purpose of random assignment, the evaluation team considered as one unit for random assignment what might be considered one multiple households (usually pairs and triads) if they were deemed to have reasonable or plausible likelihood of being the same household based on commonality in combinations of address, guardian name, children’s last name, and phone number. For example, two households with common guardian name, children’s last names, and phone number were considered to be the same random assignment unit even when they had distinct addresses. Grouping of households was performed both manually and with an automated program. The extent to which household grouping was performed manually varied from site to site and depended primarily on the overall quality of the data.

The final household list after grouping of potential duplicates was used for random assignment. Table IV.3 presents the number of households and children in the last list provided by each of the demonstration sites and the number of households used for random assignment after the process of combining potentially duplicate households.

Table IV.3 Number of Consenting Households and Eligible Children in the Demonstration Sites

<table>
<thead>
<tr>
<th>Demonstration Site</th>
<th>Original File</th>
<th>Last Submitted File</th>
<th>Final Household List</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>2,442 households, 4,431 children</td>
<td>2,422 households, 4,244 children</td>
<td>2,383 households, 4,244 children</td>
</tr>
<tr>
<td>Missouri</td>
<td>11,364 households, 19,358 children</td>
<td>11,234 households, 19,350 children</td>
<td>10,673 households, 19,350 children</td>
</tr>
<tr>
<td>Oregon</td>
<td>2,284 households, 4,729 children</td>
<td>2,148 households, 4,452 children</td>
<td>2,141 households, 4,452 children</td>
</tr>
<tr>
<td>Texas</td>
<td>23,274 households, 37,937 children</td>
<td>23,286 households, 37,791 children</td>
<td>19,923 households, 37,791 children</td>
</tr>
</tbody>
</table>

Source: Data submitted by the grantees for random assignment and data generated by the evaluation team from the random assignment process.

Note: The original file counts reflect the number of households and children prior to reviewing and cleaning the file. The evaluation team worked with the sites to clean the household files to remove duplicates and complete missing and incomplete information and then obtained the last submitted file. The remaining potential duplicate households were combined in the final household list.

2. Stratification

The evaluation team stratified the final household list prior to random assignment to assure that benefit and non-benefit groups would be balanced on the stratification variables. The household list was first stratified by the number of eligible children in the household. The stratifying variable for the number of eligible children in a household used three categories: one, two, and three or more children. The list was further stratified by SFA in sites with more than one SFA, namely Connecticut, Missouri, and Oregon. The team also checked for very small-sized strata; defined as strata containing less than 1.5 percent of the total households in the site. These very small strata were collapsed to reduce the chance of having a stratum without any households interviewed for the evaluation. The team combined very small strata representing different SFAs according to the numbers of eligible children. Table IV.4 lists the number of strata used for random assignment at each demonstration site.
Table IV.4 Number of Strata in the Demonstration Sites

<table>
<thead>
<tr>
<th>Site</th>
<th>Total Number of Strata</th>
<th>Number of Strata with 1 Eligible Child in the Household</th>
<th>Number of Strata with 2 Eligible Children in the Household</th>
<th>Number of Strata with 3 or More Eligible Children in the Household</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>24</td>
<td>9 (10 very small strata combined into 2 strata)</td>
<td>11 (9 very small strata combined into 2 strata)</td>
<td>4 (15 very small strata combined into 2 strata)</td>
</tr>
<tr>
<td>Michigan</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Missouri</td>
<td>9</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Oregon</td>
<td>18</td>
<td>6 (5 very small strata combined into 1 stratum)</td>
<td>6 (5 very small strata combined into 1 stratum)</td>
<td>6 (5 very small strata combined into 1 stratum)</td>
</tr>
<tr>
<td>Texas</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Source: Data submitted by grantees for random assignment and data generated by the evaluation team from the random assignment process.

3. Random Assignment

The demonstration design required that (a) the evaluation team randomly select consenting households with eligible children to be in the benefit group, (b) all the eligible children in the selected households receive the SEBTC benefit, and (c) the number of children receiving the benefit is approximately 2,500 at each site. To do so, the team implemented proportionate stratified random sampling, which gives each household in a site equal probability of selection. For each site, the team first computed the number of households to select in each stratum so that each stratum’s share of households to be selected was the same as the share of all households in that stratum, and so that in the end, the number of children in the selected households was approximately 2,500. The target number of households then was randomly selected in each stratum using simple random sampling without replacement. After implementing the random assignment process described above for Texas and Missouri, the team established that the total number of children selected for SEBTC could dip well below 2,500 or be substantially higher than 2,500 because the number of children in the strata with three or more children varied more than originally anticipated. To ensure that the number of children selected to receive the benefit would be exactly 2,500 or only marginally higher, the process was modified for the strata with three or more children when random assignment was conducted for the subsequent grantees.22

4. Balance Test

After conducting random assignment, the evaluation team also performed a test of balance between the benefit and the non-benefit group for each demonstration site. The two groups were compared by age, grade, and gender of children and also by race/ethnicity, language, certification type, and school lunch status of children (that is, whether the child was directly certified or included

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22 Only after random assignment in all of the strata with one eligible child and all of the strata with two eligible children, the team proceeded to the random assignment in all the strata with three or more eligible children. First, the strata with three or more eligible children were arranged in the increasing order of the target number of slots by SFA groups. Second, the team computed the number of households to select from each SFA group and rounded it stochastically for each draw. Finally, the team randomly drew the computed number of households into the benefit sample from each of the SFA groups sequentially until the total number of eligible children in the sample became 2,500 or marginally more.
on a FRP meals application) when such additional information was consistently available for all SFAs in the site. Using statistical comparisons of each variable separately and all variables together, the benefit and non-benefit groups at each demonstration site were established as well-balanced.

5. Benefit File Creation

After establishing the balance between the benefit group and the non-benefit group for each demonstration site, the team then created a file of households listing eligible children in the benefit group and provided that file to the grantee for mailing and card distribution. Sites also received a similar file for households and eligible children in the non-benefit group to facilitate mailings. The process of notifying households of their assignment is discussed below in Section E.

D. Time Needed for Consent and Random Assignment Process

The grantees and evaluation team only had four to five months after the grants and evaluation contract were awarded in December 2011 to complete the consent and random assignment process. These steps had to occur quickly to leave sufficient time for grantees to take the steps needed to issue benefit cards and for the evaluation team to conduct the baseline survey with families prior to the end of the school year.

The first step in the process, constructing the initial sample of eligible households, varied by SFA and depended on the level of sophistication of the school MIS and the availability of staff to conduct programming if needed. The grantee consent process took between two and five weeks. Once the files were sent to the evaluation team, the process of diagnosing and resolving issues took between 1 and 2.5 weeks. However, in some cases, several weeks sometimes passed before the evaluation team reviewed a grantee’s files, because staff time was devoted to resolving issues on files submitted by earlier grantees. Once the files were cleaned to an acceptable level, the process of randomly assigning households to the benefit group took 2 to 5 days.

Overall, it took 20 to 30 days from when the evaluation team received the first file to when random assignment was completed and the file could be sent back to the grantee and staff could implement the processes needed to issue the benefit. Grantees that had to contact families a second time to gather additional information took longer, on average, before the grantee could start the process of issuing the benefit.

E. Household Notification of Random Assignment Results

Once random assignment was complete, grantees needed to notify those households that would be receiving the benefit and provide information on next steps. In some cases, grantees also needed to collect additional information from grantees to create accounts in eligibility systems that were necessary before EBT cards could be issued. Table IV.5 provides a summary of the steps taken by each of the grantees.

All five grantees had notified families by mid-May. Notification letters are included in Appendix C. The reading level (using the Flesch-Kincaid scale with agency names eliminated) for these letters ranged from grade 6.2 to grade 10.0. All letters congratulated the household on being selected to receive the benefit and provided a telephone number to call for answers to questions. The remaining content of the letters varied, in part according to whether grantees were using the WIC or the SNAP model.
## Table IV.5 Notification and Enrollment Process

<table>
<thead>
<tr>
<th>Grantee</th>
<th>Notification, Enrollment, and Administration of Benefits to the Benefit Group</th>
<th>Notification of Non-Benefit Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>Grantee will send a second mailing to families who were assigned to receive the benefit to obtain information needed for the State eligibility system (e.g., parent date of birth and social security number). Guardians must return the information to receive the benefit. Cards will then be mailed with activation instructions. Approximately two thirds of households were already known to the State eligibility system and cards could be issued without the returned form. Approximately 20 percent of households are not known to the system and/or had not returned the second mailing.</td>
<td>Yes</td>
</tr>
<tr>
<td>Michigan</td>
<td>The grantee takes the list of selected households and will mail out a letter informing them of their selection. The letter includes information about the food package, a local number to call with questions, and information on the website that includes parent training videos. Cards will then be mailed by the EBT processor with activation instructions.</td>
<td>Yes</td>
</tr>
<tr>
<td>Missouri</td>
<td>The grantee determined whether selected households had a case ID on the State public assistance eligibility system. If the household was not located on the system, a new case ID was established. The grantee then entered the case into the EBT administrative terminal to issue the benefit and sent the final list of the benefit group to LINC. LINC sent notification letters to the guardians selected to receive the benefit. Cards will be sent to households without existing EBT cards along with activation instructions.</td>
<td>Yes</td>
</tr>
<tr>
<td>Oregon</td>
<td>The grantee determined whether selected households had a case ID and were receiving SNAP. If a household was not located on the system, a new account was created. The grantee will send a letter notifying households that they were selected to receive the benefit. Cards will be sent to households without existing EBT cards along with activation instructions.</td>
<td>Yes</td>
</tr>
<tr>
<td>Texas</td>
<td>WTFB received the list of households assigned to the benefit group and sent a confirmation letter with a data form to be returned with information (e.g., contact information, names of children that needed separate EBT cards) needed to set up the EBT card. WTFB followed up by telephone as needed. WTFB provided an updated household file to the WIC agency, where the file was cleaned and reformatted. WTFB set up a training schedule and contacted the benefit group households by telephone or text message to schedule dates for training, where EBT cards would be distributed.</td>
<td>No</td>
</tr>
</tbody>
</table>

Source: Evaluation technical assistance efforts with demonstration grantees through June 30, 2011.

EBT = electronic benefits transfer; LINC = Local Investment Commission; SNAP = Supplemental Nutrition Assistance Program; WIC = Special Supplemental Nutrition Program for Women Infants, and Children; WTFB = West Texas Food Bank

The two grantees using the WIC model provided different information in notification letters to the benefit group. The notification letters for Michigan provided the dates of the benefit months, information on how to activate the card when it arrives, and indicated that additional training materials are available on the State WIC website. The Michigan grantee also enclosed details on the food package and a list of eligible foods. In Texas, the letter told families that they needed to attend an in-person training to receive the EBT card and instructed households to verify their contact information and report changes in the living situation of the eligible children. The State also mentioned that the evaluation team might contact the household to conduct a survey and described
that participation in the program would not affect receipt of other benefits. Texas limited the information in the mailing because the details would be provided through in-person training.

In the two SNAP States that had finalized letters, both Connecticut and Missouri indicated the $60 value of the monthly benefit, provided information on how to call and activate the EBT card, and explained that the evaluation team might contact them to conduct a survey. Connecticut also sent a registration form asking households to submit critical information, such as contact information, parent demographics and date of birth, social security number, and the number of children currently living in the household, before they would be issued the new SEBTC card. The State also explained that participation would not affect the receipt of other benefits and provided information about SFSP sites in the local area. Implementing the hybrid approach, Missouri explained that benefits would be added to the household’s existing EBT card if they were currently receiving SNAP and that benefits could be used to purchase food where SNAP was accepted. The State also indicated that participation in 2012 might be possible if the program was expanded.

Four of the five grantees also chose to notify households in the non-benefit group that they were not selected to receive the benefit. Instead of notifying households that they did not receive the benefit, Texas decided to use its budget allocation for mailing to invite all households in the school district to participate in the demonstration, instead of a subgroup. Three of these grantees had finalized their letters at the time of the evaluation site visits in late April and early May. In addition to explaining that the family was not selected to participate, two grantees mentioned the possibility of participating in summer 2012, two grantees indicated that the evaluation team may contact the household to conduct a survey, and two grantees provided information on the SFSP and other summer feeding sites in the local area. Among these three letters, the reading levels (using the Flesch-Kincaid scale with agency names eliminated) ranged from grade 7.6 to grade 10.1.

F. Enrolling Participants for SEBTC Benefits

Beyond notifying benefit group households that they were selected for the program, grantees had to create cases in either the SNAP or WIC eligibility systems in order to administer benefits (Table IV.5). The process differed across sites, most notably between WIC and SNAP sites. Only preliminary information on these activities was gathered during the evaluation’s spring site visits, as most States were still actively engaged in planning the process. More information will be gathered during subsequent visits and included in later evaluation reports.

In all three SNAP sites, the State agencies that administer SNAP had to manually match the list of benefit group members to their existing State databases. In Missouri and Oregon, this allowed the State to ensure that SEBTC benefits were loaded onto existing EBT cards for households already receiving SNAP. It also alerted them to cases where a new EBT card had to be issued if the household was not on SNAP. In Connecticut, the SEBTC benefits are being administered on a separate card for all benefit group members. However, the matching process was still required as benefits are being administered through the existing State system, and the State wanted to ensure

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23 It is unclear whether and how this would have an impact on households in the control group cooperating with the summery data collection. At baseline, these households did not yet know they had not been selected.

24 The Missouri grantee was unable to match 19 households to their state database. As a result, they received a list of 17 replacement families from the evaluation team to include in the demonstration. This allowed them to ensure that 2,500 children would receive the summer benefit.
that new records were not being added for households with other types of benefits. Although the matching process may seem relatively straightforward, it took significant staff resources, sometimes beyond what was allocated in the State’s grant budgets, given the quality of the household data. The easiest variables to use for matching include the guardian date of birth and social security number but these were not part of the initial consent materials for most of the grantees. For grantees that lacked this information, matching had to be done by guardian and children’s names and addresses. In particular, States had to reconcile cases where data from the SFAs did not match data in the State database, including cases where a child had a different guardian listed or the household address was different.

Once the matching was complete, all three States had to implement additional steps. In Oregon, dummy cases using a standard date of birth (because that variable was typically not available for guardians) were entered into the State system for those non-SNAP households in the benefit group. Then all SEBTC cases were transmitted to the EBT vendor through the existing State eligibility system for administration of the benefit. In Missouri, the State generated new identifiers for non-SNAP families. Then State staff manually entered the value of the SEBTC benefit for all benefit group members (both SNAP and non-SNAP) into the State’s EBT administrative terminal. This terminal transmitted the demonstration data to the EBT vendor for administration of the benefit and allowed the vendor to bypass the State eligibility system, which required significantly more data fields on household guardians than were available from SFAs. In Connecticut, the State had to collect additional data (including social security number and date-of-birth of guardians) for households that were not already in their State system. This included 577 of the 1,425 households assigned to the benefit group. By the end of June, the grantee was still missing required information from 196 households and was unable to issue cards to them. Information on households already in the state system and those new households that returned information were transmitted to the EBT vendor through the existing State eligibility system for administration of the benefit.

In contrast to the SNAP sites, the WIC sites were able to implement more straightforward processes for enrolling participants that did not require any manual matching. Both States developed new utilities for their EBT systems specifically for the demonstration. The final list of benefit group households was loaded automatically through these utilities, the food package was assigned, and the data were transmitted to the EBT vendor for administration of the new cards and benefit. In Texas, the list was manually updated by WTFB and cleaned by the Texas WIC agency, prior to creating the EBT household records and cards. In Michigan, the file from random assignment was used without any data entry or editing. More details on the EBT programming required for the demonstration are provided in Chapter V.

G. **Summary**

This is the first time a SEBTC Demonstration has ever taken place, and it was done so under a challenging time frame. The grantees and evaluation team learned a range of lessons that will fundamentally improve the consent and random assignment process for 2012. New grantees will be able to learn from the POC grantees about successful approaches to obtaining consent. The evaluation team will also be better positioned to anticipate the steps involved in diagnosing issues with the files sent for random assignment, provide more guidance to grantees and SFAs, and implement steps to streamline the process during the full demonstration year.
V. EBT SYSTEMS MODIFICATIONS AND OPERATIONS

As described in Chapter II, the Summer EBT for Children (SEBTC) Demonstration is leveraging existing SNAP and WIC EBT technologies and telecommunications networks to issue benefits and cards. Given programmatic differences between the SNAP and WIC programs and this new demonstration, a range of modifications must be made to EBT systems. In particular, grantees and their EBT processors needed to consider how the program will affect the way benefits are issued and redeemed, how customers will be supported in their use of the benefit, and how funds are obligated for settlement to SNAP retailers and WIC-authorized vendors. This chapter begins with an overview of the SNAP and WIC EBT systems more broadly and then turns to a discussion of the EBT modifications required for the demonstration. The chapter ends by describing the status of system modifications through the end of the school year.

A. Overview of SNAP and WIC EBT

Conventional online EBT is similar to a debit card transaction in that it uses a magnetic stripe card and requires a personal identification number (PIN) to authenticate the transaction. The transaction is sent at the time of the purchase through commercial credit/debit networks for authorization by the EBT system’s central (or “host”) computer. SNAP EBT, as implemented by all States and territories, follows this model. As with credit/debit cards, SNAP cards are portable, meaning that a SNAP card issued in one State can be used in any State. SNAP benefits may only be used to purchase food items at SNAP retailer locations that are authorized by FNS.25

WIC EBT systems are different. The WIC program issues a tailored set of foods to each recipient, from a list of those that can be paid for by the WIC program. WIC EBT systems must therefore assure that only specific WIC “allowable foods” prescribed for an individual are paid for with the benefit card. A State with WIC EBT may use online transaction technology, similar to the way that SNAP EBT systems operate, or an offline transaction using a “smart card.” A smart card has an embedded chip that includes information about the specific foods available to the card holder and a processor.26 The Michigan SEBTC grantee has an online system. The Texas grantee is using an offline, or smart card, approach.

Table V.1 provides information on the programs and technologies used by the five grantees participating in the POC year. It also includes the names of EBT processors contracted by each State to administer benefits and additional contractors supporting the EBT process. The demonstration includes two of the three primary SNAP EBT processors nationwide and both online and offline WIC EBT systems.


26 Because the WIC EBT purchase transaction occurs between the smart card and the card acceptance terminal, there is no real-time communication with the EBT host system during the transaction. As a result, the transaction is referred to as an offline transaction.
# Chapter V. EBT Systems Modifications and Operations

## Table V.1 EBT Programs and Technologies Used by the Grantee States

<table>
<thead>
<tr>
<th>Program Technology</th>
<th>Connecticut</th>
<th>Missouri</th>
<th>Oregon</th>
<th>Michigan</th>
<th>Texas</th>
</tr>
</thead>
<tbody>
<tr>
<td>SNAP online, magnetic stripe cards</td>
<td>SNAP online, magnetic stripe cards</td>
<td>SNAP online, magnetic stripe cards</td>
<td>WIC offline, smart cards</td>
<td>WIC offline, smart cards</td>
<td></td>
</tr>
<tr>
<td>EBT Processor</td>
<td>JPMorgan Chase Electronic Funds Services</td>
<td>Fidelity National Information Services, Inc. (FIS)</td>
<td>Affiliated Computer Services, Inc. (ACS)</td>
<td>Texas Department of State Health Services (TDSHS)</td>
<td></td>
</tr>
<tr>
<td>Additional Processors Supporting EBT</td>
<td>L1 Credentialing (card fulfillment)b</td>
<td>None</td>
<td>None</td>
<td>Three Sigma (Account setup utility)c</td>
<td>SoliSYSTEMS (Account setup utility and card fulfillment)d</td>
</tr>
</tbody>
</table>

Source: Grantee proposal documents and evaluation technical assistance efforts.

*a Of the five grantee States, only Texas processes its EBT transactions in house, meaning TDSHS owns, operates, and maintains its WIC EBT system. The other four grantee States outsource EBT processing services.

*b Card fulfillment is the purchase, personalization, and distribution of payment or identification cards. Connecticut contracts separately for card fulfillment services, which is provided as a core service by FIS in Missouri and Oregon and by ACS in Michigan.

*c Due to the nature of WIC certification systems, both Michigan and Texas required a “utility,” a system separate from the States’ WIC certification systems, to set up SEBTC accounts and assign benefits to accounts.

*d As the State of Texas does not manufacture smart cards; it must contract separately for smart cards. In addition, for the SEBTC program, SoliSYSTEMS is providing card fulfillment services (personalization and distribution). This is not required by the Texas WIC Program, which normally issues cards “over the counter” at clinic locations.

## B. Changes to EBT Systems for the Demonstration

During the spring of 2011, SNAP and WIC EBT processors and other contractors supporting the grantees undertook modifications to support the demonstration. All grantees chose to align their SEBTC Demonstrations as closely as possible to existing SNAP or WIC systems to minimize the impacts to current systems. In many areas, no modifications were needed. These included card technologies, purchase transactions, third-party processor systems, eligible food items, and staffing.27

Despite the fact that these major systems could be leveraged, some modifications were still required to administer this new SEBTC benefit. In particular, EBT processors had to consider strategies for five processes: (1) account setup, (2) benefit processing, (3) participant support, (4)

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27 Card technologies will mirror the existing card technology in the grantee State, including the file format for the integrated circuit chip embedded in the Texas WIC smart card. Purchase transactions will also mirror SNAP EBT or WIC EBT transactions and require no changes to retailer electronic cash register systems, POS hardware or software, or third party processor systems. SEBTC food items issued through WIC will mirror States’ authorized WIC food items (although quantities may differ); therefore, no changes are needed to States’ Universal Product Code (UPC) or Product Look-up (PLU) code databases. None of the EBT processors or other processors indicated having to hire additional staff or subcontractors to fulfill their SEBTC requirements.
benefit expiration and expungement, and (5) benefit settlement and reconciliation. This section
describes each of these modifications.

1. Account Set-Up

To issue benefits for SEBTC, EBT processors had to create a new account for each beneficiary. Connecticut and Oregon entered SEBTC participants into their SNAP eligibility systems (Table V.2). Consequently, the account setup and benefit issuance file were sent to the EBT processors via batch file.28 This is the same process used for SNAP EBT, requiring no change to the EBT systems.

By contrast, Missouri (one of the SNAP States) modified its procedures to set up SEBTC accounts. It elected to bypass its SNAP eligibility system because too many data fields had to be entered to conform with SNAP eligibility requirements even though they were not relevant for the demonstration. The grantee determined that, given this fact, modifications to the system were not cost-effective. Instead, the State requested that its EBT processor make changes to the State-level administrative terminal functions so that designated staff could manually enter SEBTC participants into the EBT system.

Table V.2 Modifications to EBT Account Set-Up

<table>
<thead>
<tr>
<th>Change Required</th>
<th>Connecticut</th>
<th>Missouri</th>
<th>Oregon</th>
<th>Michigan</th>
<th>Texas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process for Entering or Uploading Account and Issuance Data</td>
<td>The EBT system and card issuance system will receive a batch file from the Connecticut SNAP eligibility system.</td>
<td>The EBT processor modified its administrative terminal functions to allow manual entry of new accounts into the EBT system.</td>
<td>The EBT system will receive a batch file from the Oregon SNAP eligibility system.</td>
<td>Three Sigma developed a new utility to create an account and issuance file for transmission to the EBT system. The EBT system required an interface with the new utility.</td>
<td>SoliSYSTEMS developed a new utility to create an account and issuance file for transmission to the EBT system. The EBT system required an interface with the new utility.</td>
</tr>
</tbody>
</table>

Source: Interviews with EBT processors in late April and early May 2011.

Both WIC States also required modifications. In general, States’ WIC management information systems (MIS) certify WIC participants and then issue food benefits based on the specific needs of a participant. In the WIC EBT environment, these food benefits are issued from the WIC MIS to the WIC EBT system and, in the case of Texas, to the WIC EBT smart card. Both Michigan and Texas made the determination that their WIC MIS could not be used to issue SEBTC benefits because system modification for SEBTC would affect many systems rules. Instead, both States elected to use outside contractors to develop an account setup and benefit issuance “utility”—in essence an abbreviated and completely separate version of the WIC MIS. In Michigan, Three Sigma, the

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28 A batch file is a set of records produced by a program. To set up accounts via a batch process, the State creates a file of data for new cardholders (name, account number, etc.) and transmits the file to the EBT processor, which adds the data to its master file of cardholders. The alternative method of creating EBT accounts is to enter the data for individual cardholders on-line.
contractor that maintains the State's WIC MIS, developed this utility; in Texas, SoliSYSTEMS, the contractor that provides the State's WIC EBT smart cards and other software services, was responsible.

2. **Account Processing**

All EBT systems have been modified to establish a separate program type for SEBTC benefits so that transactions can be tracked and reported from issuance through redemption and settlement. Tracking benefits is simplified when an account is identified as a SEBTC account and only contains related benefits.

With EBT, however, it is possible to put multiple benefits into one account, including several types of food benefits (such as SNAP, SEBTC), cash benefits (such as Temporary Assistance for Needy Families), and cash payments (such as child support). When grantees decided how to provide SEBTC benefits to families, they had to balance the trade-offs between the impacts of costs, stigma, and usability of issuing a separate card for SEBTC, versus the issues entailed when using an existing EBT card, if a household already had one. If a grantee decided to issue SEBTC benefits on current cards if they exist, the system then must be configured to draw benefits or funds from different authorizations in the correct sequence, or “order of draw.”

As described in Chapter II, the two States using the SNAP-hybrid approach (Missouri and Oregon) needed to address the issue of the order of the draw. The Oregon grantee determined that it will place preference for the draw on SEBTC funds, regardless of whether these benefits are issued before or after SNAP benefits. As a result, SNAP participants receiving SEBTC benefits will use their summer benefits automatically before using the SNAP benefits. Given that summer benefits will expire when school begins, this ensures that households with existing SNAP balances do not risk forfeiting their demonstration benefit. By contrast, Missouri will place the preference for order of draw on the first funds issued to the account (SNAP or SEBTC), commonly referred to as the “first-in, first-out” rule. SEBTC benefits will be issued on the last day of the month so that the issuance date will precede the issuance data for SNAP benefits, which will be early the next month. Although this requires only minor system modifications, it has implications for the use of benefits. Participants will have to draw down all of their existing SNAP balance from prior months before accessing SEBTC benefits for the current month. As a result, participants with large balances on their SNAP account may not be able to access their summer benefits before they expire at the end of the summer.

3. **Card and PIN Issuance and Replacement**

Although most States will use existing procedures for card and PIN issuance, Texas and Missouri needed to modify their processes. In Missouri, cards and PINs as well as replacements will be issued through the normal SNAP procedures, with one exception. Normally, when cardholders lose their cards or forget their PINs, they must call the customer service line and provide their date of birth as proof of identity. Because the three participating Missouri SFAs were unable to provide guardian dates of birth, given that the State did not pursue an active consent process, as described in Chapter IV, the grantee does not have that information for guardians who had not previously

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29 This issue will be explored further during the analysis of EBT transactions, which will be provided in the 2011 congressional report.
received any State benefits. As a result, if these guardians contact the customer service line for a replacement card or PIN, they will be referred to a hotline at LINC. LINC will gather the relevant data, send them to the State, and request that a replacement card or PIN be provided to the participant.

Because Texas is leveraging its WIC EBT “smart card” (or “off-line” card) technology, and because of the grantee’s decision about how to issue the cards, three steps were necessary to accommodate SEBTC that did not apply to any of the other grantees. First, SoliSYSTEMS encoded benefits and a predetermined PIN onto the cards and shipped cards in bulk to the West Texas Food Bank (WTFB) which will provide the cards to recipients who participate in the in-person training that is being conducted. Second, steps were taken to mitigate problems that might occur because the current system has a process in place so that if a user enters the wrong PIN too many consecutive times, the card will lock. To address this issue, WTFB is being supplied with a terminal designed to unlock cards when a client has incorrectly entered a PIN number too many times. WTFB is also being provided with a point of sale (POS) terminal that will print a receipt (current benefit balance showing remaining quantities of prescribed foods) upon cardholder request. Third, a card replacement utility, also developed by SoliSYSTEMS, will be housed at the State WIC office. Cards will be replaced by State personnel five business days after receiving a report of the original card being lost or stolen, and will be shipped to the WTFB with the PIN pre-encoded on the chip.30 Participants will be able to pick up replacement cards at WTFB.

4. Customer Service

All of the EBT processors plan changes to their customer service procedures to respond to questions from participants in SEBTC. When a participant contacts the customer service line, they initially interact with an integrated voice response (IVR). Michigan is the only State that will change its IVR to allow SEBTC participants to select their own PINs. For the other four grantees, the IVR functions will remain the same. However, all five grantees will adjust their live customer service representative (CSR) scripts to address questions about the demonstration. In Connecticut, Missouri, Oregon, and Michigan, the State worked with the EBT processors to develop frequently asked questions and to train all CSRs to identify and respond appropriately to questions about the benefit. In Connecticut, CSRs may refer more complicated questions to the SNAP agency. In Texas, WTFB will be the primary point of contact for customer service. However, three CSRs in the State offices are being trained specifically to support calls about the demonstration that WTFB cannot resolve.

5. Expiration and Expungement

When benefits are issued through an EBT system, the processor must ensure that benefits expire and can no longer be accessed by the participant according to program rules. The processor must also expunge or remove the benefits from the system entirely according to these rules. WIC EBT benefits are issued with a beginning and end date and expire as of the end date. This conforms to requirements of the SEBTC Demonstration, in which benefits must expire before the first day of the next summer month. For SNAP, benefits do not have a predetermined expiration date, but EBT

30 A five-day lag is necessary to ensure that retailers have settled all transactions on the card by loading data to the State host computer.
systems expunge SNAP benefits if they remain unused for a specified period of time. Given that demonstration benefits must expire at the end of the summer and be expunged on a set date, system modifications were needed for three grantees using a SNAP-model approach. Both of the SNAP EBT processors working with the three relevant grantees were able to accommodate this need. However, one processor will need to manually close out each account on the day the benefit ends.

6. Settlement and Reconciliation

The settlement and reconciliation processes are the final steps in benefit administration. For SNAP, EBT systems post a SNAP issuance file each day to a special account, called a letter of credit (LOC). As funds are spent, the EBT system daily posts a LOC file to this account to draw the funds necessary to settle payments to retailers accepting SNAP transactions. At the same time, EBT systems create and post a redemption data file to the Store Tracking and Redemption System II (STARS), which FNS uses to monitor retailer redemption activity. The amount paid to the EBT processor’s account for settlement to retailers must reconcile against the amount paid to retailers in STARS.

The U.S. Treasury Department and FNS required that SEBTC funds be tracked, settled, and reconciled separately from SNAP because monies are coming from two different funding sources. For SNAP EBT systems to automate a separate settlement process, a separate SEBTC LOC must be posted daily to the special account and a separate file for SEBTC redemptions must be sent to STARS. However, it was not clear when grantees were responding to the RFA that separate LOC and STARS files would be required. As a result, the grantees and their EBT processors in the sites using the SNAP approach (Connecticut, Missouri, and Oregon) did not plan for this requirement. The SNAP EBT processors did not include relevant systems modifications in their initial budgets and had to develop and implement strategies to address the issue before SEBTC benefits could be issued. JPMorgan (the processor for Connecticut) determined it could accommodate this requirement through an automated process in time for the implementation of the SEBTC benefit. However, FIS (the EBT processor for Missouri and Oregon), is not be able to create an automated process within the limited time frame. Instead, FIS will manually submit an LOC file for SEBTC funds at the end of each month, while manually adjusting the previously submitted LOC files for the month. To reconcile with the STARS account, FIS will manually reconcile the LOC data with the data submitted to STARS when the 2011 SEBTC program is closed out.

The settlement and reconciliation processes are slightly different for the WIC EBT systems used by the Michigan and Texas grantees. Both States have or will establish a separate letter of credit (LOC) for the SEBTC program. In addition, in accordance with the WIC program, for SEBTC the two WIC State agencies will draw funds from FNS based on projected estimates of expenditures and hold these funds in a clearing account for drawdown by the EBT processor. Therefore, once separate Letters of Credit are established for the demonstration, no systems modifications are needed.

C. Status of the System Changes in the Grantee States

EBT processors in all five States were able to implement the SEBTC at the end of the school year. The majority of programming and testing of modifications had been completed at the time of evaluation interviews in late April and early May, and remaining work was completed on schedule. Below is a summary of the processors’ activities at the time of the interviews as well as updated information based on subsequent discussions with grantees.
1. Connecticut

As of the last week of April, JPMorgan stated that all activities were on schedule and that the majority of system changes would be ready by May 14. It also indicated that testing the LOC file would be done by May 16, with implementation targeted for June 11.

L1 Credentialing created a new card design, and as a separate card it is being issued to each participating household regardless of whether they already participated in the SNAP program. L1 will upgrade the type of card so that the magnetic strip is more difficult to erase accidentally than the current SNAP card used in Connecticut.

Based on information gathered from the grantee in mid-June, there were issues with the SEBTC card, in that the physical SEBTC cards were issued with a last digit that did not match the number on JPMorgan’s system. As a result, when the guardian calls to PIN the card the number they key in did not match the number on the system. The problem was created because the correct algorithm for the SEBTC card numbers was sent to JPMorgan but an incorrect algorithm on the card file went to the EBT card vendor. This resulted in one card number being printed on the SEBTC cards, and a different card number being reflected in JPMorgan's EBT system. To resolve the issue, the EBT card vendor printed approximately 1,250 SEBTC replacement EBT cards. Households started receiving these cards on June 18.

2. Missouri and Oregon

The development, testing, and verification phases for Missouri were complete as of early May. The development work for Oregon was also complete, but there is no testing planned as Oregon will be sending over account setup records with its normal issuance file, so none will be needed for account setup. The processor plans to test the order of draw to debit the summer benefit before SNAP as well as the process of benefit expiration and expungement. As FIS is manually submitting the LOC file for SEBTC, it had to ensure that staff members have the proper authorizations to access the new LOC so they can proceed. The grantee reported that this process was complete before the end of the school year.

3. Michigan

As of late April, the development work was completed, and both Three Sigma and ACS were ready to begin testing their systems. Both firms indicated that work was on schedule and saw no obstacles to implementation. The grantee confirmed that all activities and testing were complete by the end of the school year.

4. Texas

As of late April, smart cards had been ordered and received by SoliSYSTEMS; the SoliSYSTEMS card issuance, PIN unlock, and card replacement utilities had been developed; changes to the TDSHS WIC EBT system had been completed; and end-to-end testing had been performed on test cards and test replacement cards. SoliSYSTEMS loaded the cards and sent them to WTFB on May 2, in preparation for the scheduled start of card issuance and training on May 10.
D. Summary

All EBT processors were able to administer SEBTC benefits at the start of the summer period. The SNAP EBT processors reported that their greatest challenge was developing a strategy to accommodate requirements for a separate LOC. For the WIC EBT processors, developing the issuance file layout and working with poor-quality participant data entered into the issuance utilities were the greatest challenges. These unanticipated tasks also resulted in some budget concerns as the initial grant budgets underestimated the level of effort required for the demonstration. Moving into the full demonstration year, the processors will have many of the systems in place for another year of benefits. In addition, FNS will be able to provide guidance to additional processors involved with new grantees about the tasks and time line required to set up procedures to administer the new benefits.
VI. EARLY FINDINGS FROM THE PROOF-OF-CONCEPT YEAR

FNS designed the Summer EBT for Children (SEBTC) demonstration to allow the POC year to serve as a learning opportunity. In the first few months of the implementation, grantees had many significant successes, despite a challenging time frame for planning and implementation. This final chapter begins with an overall assessment of the status of grantee activities through the first week of benefit administration. Drawing information from across the report, the chapter then turns to key themes in three main areas: (1) policy guidance, (2) program operations, and (3) evaluation design. The discussion of these lessons aims to help guide ongoing work as SEBTC moves into the full demonstration year in 2012.

A. The Status of POC Grantees During the First Week of SEBTC Benefits

Despite conducting demonstration activities for the first time, working under extreme time pressure, and facing many challenges, the five POC grantees accomplished a series of major milestones in preparation for administering the SEBTC benefit. In particular, they were able to identify eligible children and households, complete the consent process, notify households of their random assignment, complete EBT systems modifications, and start issuing benefits for at least some portion of the households selected to receive them.

All five grantees were able to successfully start the administration of benefits on the day after the 2010-2011 school year ended. Through the first week after school ended, States had issued benefits to between 57 and 100 percent of households assigned to the benefit group (Table VI.1). In the three sites that require households to activate their cards, 35 to 71 percent of all benefit-group households had selected a personal identification number (PIN) and activated their SEBTC benefits during this same period. Grantees reported that, cumulatively, households had made 8,767 transactions on their SEBTC accounts and purchased $221,122 in food during the first week of benefit administration. However, the grantees experienced a number of challenges as benefits became available to families during that first week after the school year ended.

- Connecticut distributed cards to the majority of households assigned to the benefit group. However, as discussed in Chapter IV, the grantee had to solicit additional information from a subset of households that were not already in the State system. They had obtained required information from and distributed EBT cards to all but 196 households and were still attempting to contact the remainder at the end of the first week of benefits. In addition, the SEBTC cards were issued with a last digit that did not match the number on JPMorgan’s system. As a result, the card vendor had to print approximately 1250 replacement cards, which households began receiving two days after school ended.

- Michigan had distributed SEBTC cards to all benefit group households by the end of the school year. Through the first week of the summer, about two-thirds of households had pinned their cards. The grantee was attempting to contact remaining households to encourage them to select a PIN and actively access the benefits.

- Missouri had loaded SEBTC benefits onto existing EBT cards for all benefit-group households currently receiving SNAP and had distributed new EBT cards to the remaining households in the benefit group. The grantee reported that 149 cards were returned by the post office as undeliverable but was able to resolve 141 of these cases by
Chapter VI. Early Findings from the Proof-of-Concept Year

the end of the first week by either identifying new addresses or determining that the household had moved from the demonstration area and was no longer eligible.

• Oregon had loaded SEBTC benefits onto existing EBT cards for those currently receiving SNAP benefits and distributed new EBT cards to those not receiving SNAP benefits. The grantee experienced a database error that caused a small number of control group members to be issued benefit cards. However, the error was caught and corrected before those households were mailed their cards.

• Texas was able to provide in-person training and distribute SEBTC cards to the majority of households in the benefit group. As of the first week of the summer, the West Texas Food Bank reported that 649 of the cards had not been activated. This includes 12 households that declined the benefit, 122 households that were no longer living at the address on file, and 515 households that had not shown up for training despite reminder letters and phone calls. They were continuing efforts to contact households.

### Table VI.1 SEBTC Card Distribution and Account Activity in the First Week of Benefit Administration

<table>
<thead>
<tr>
<th>State</th>
<th>Number of Households Assigned to Benefit Group</th>
<th>Number of New Cards Issued or Existing Cards with Benefits Added in Week 1&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Number of Cards Returned, Undeliverable or Unclaimed in Week 1&lt;sup&gt;b&lt;/sup&gt;</th>
<th>Number of Cards Pinned in Week 1&lt;sup&gt;c&lt;/sup&gt;</th>
<th>Total Number of Transactions in Week 1</th>
<th>Total Dollar Volume of Transactions in Week 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut</td>
<td>1,425</td>
<td>1,276</td>
<td>222</td>
<td>1,012</td>
<td>1,794</td>
<td>$37,380</td>
</tr>
<tr>
<td>Michigan</td>
<td>1,360</td>
<td>1,360</td>
<td>42</td>
<td>900</td>
<td>702</td>
<td>$15,381</td>
</tr>
<tr>
<td>Missouri</td>
<td>1,446</td>
<td>1,444</td>
<td>149</td>
<td>Not applicable</td>
<td>2,891</td>
<td>$71,081</td>
</tr>
<tr>
<td>Oregon</td>
<td>1,207</td>
<td>1,229</td>
<td>28</td>
<td>Not applicable</td>
<td>2,532</td>
<td>$73,448</td>
</tr>
<tr>
<td>Texas</td>
<td>1,507</td>
<td>858</td>
<td>649</td>
<td>525</td>
<td>848</td>
<td>$23,832</td>
</tr>
<tr>
<td><strong>Total Across All States</strong></td>
<td><strong>6,945</strong></td>
<td><strong>6,198</strong></td>
<td><strong>1,092</strong></td>
<td>Not applicable</td>
<td><strong>8,767</strong></td>
<td><strong>$221,122</strong></td>
</tr>
</tbody>
</table>

<sup>a</sup> The number of cards issued exceeds the number of households randomly assigned to the benefit group in Oregon and the grantee was still trying to resolve this discrepancy. The number of cards issued was less than the number of households randomly assigned to the benefit group in three states—Connecticut, Missouri, and Texas. In Connecticut, the grantee was unable to issue cards to 196 households that did not return forms with data required for enrollment in the state system. Another 47 households were also reissued a second card due to a change in guardian or incorrect household information entered into the state system. In Missouri, the state could not match 19 households with their state database. As a result, they assigned benefits to only 17 replacement households from the evaluation team to bring the total number of children receiving benefits up to 2,500. In Texas, households were only issued a card if they attended in-person training. The grantee was continuing outreach to those households that had not claimed their cards in the first week after school ended.

<sup>b</sup> This number includes cards that were returned as undeliverable, including both those that were resent when a correct address was determined and those that could not be sent. In Connecticut and Texas, it also includes cards that could not be issued due to missing information or because the head of household did not attend in-person training. In Texas, it also includes 26 households that declined the benefit.

<sup>c</sup> In Missouri and Oregon, households are sent a personal identification number (PIN) by the state and therefore do not need to activate the card by selecting a PIN.
B. Policy Guidance

As this was a new demonstration, a number of questions arose as grantees worked on the early implementation that went beyond details provided in the RFA in fall 2010. As questions emerged in the early months of the demonstration, FNS refined and gave greater detail about several policy issues. Specific policy areas are discussed below.

1. Clarification of Eligibility Rules

The RFA specified that all children in kindergarten through 12th grades who qualify for FRP meals were eligible for the SEBTC benefit. As the participating SFAs began developing lists of eligible children, a range of questions emerged about the eligibility of special populations. For instance, grantees raised questions about whether children in pre-kindergarten who qualify for FRP meals could be or were required to be included, and whether graduating 12th graders were eligible for the summer benefit, how to handle situations when families claimed to have more children than were listed on consent materials, and how to handle issuing the benefit for families that moved before they received their SEBTC cards. Other special groups such as emancipated youth were identified. Grantees also asked if benefits for foster children should be issued separately from other children in the household so the card could follow the child if the guardian changed and how households with homeless children should be configured. FNS provided feedback to grantees on eligibility as these cases emerged. Some of the grantees, however, reported that if program rules differed from their understanding of them, it was challenging to make appropriate changes in the short time they had to develop lists of eligible households. Because guidance was sometimes provided specifically to a grantee that asked a question about eligibility rules and not to all grantees, it is not clear if all grantees are implementing eligibility policies uniformly.

2. Contents of the WIC Food Package

Although FNS defined a general WIC food package for the SEBTC Demonstration as grants were being awarded, the specific foods in the package had to be customized for both grantees using the WIC approach. During the early planning phase, FNS worked with these grantees to identify potential substitutions (for example, whole grain tortillas for whole wheat bread). The grantee in one State expressed a desire to ensure that no new foods were added to the package and wanted discretion to implement cost-containment measures such as requiring the least expensive brand.

When the WIC package was fully defined, a separate issue emerged regarding the cost of the package. The initial package that FNS approved was valued at $60 based on national averages of food prices. However, prices vary by State, and one of the two participating State’s had a policy requiring that beneficiaries purchase the least expensive food items, causing the food package costs to be less than the national average. Some stakeholders among the WIC grantees worried that benefit recipients would be disappointed to learn that the WIC benefit was actually less than $60 a month as advertised.

3. Prorating of Benefits and Procedures for Disabling Benefits Midmonth

In the spirit of providing benefits while children do not have access to FRP meals at school, FNS stated in the RFA that the value of SEBTC benefits would be prorated for partial months for the grantees using SNAP approaches based on the last day of the current school year and the start date of the next school year. However, no specific guidance was provided for the minimum number of days needed to justify prorating.
Some grantees experienced challenges with prorating given that participating school districts did not identify their 2010–2011 school end dates until early March (due to snow closings) and their 2011–2012 school start dates until early April. When dates were finalized, at least one grantee was confused as to whether benefits had to be prorated given the specific day of the month when school began. The final decision to prorate affected the data entry procedures for the grantee and EBT vendor as they entered the amount of benefits to be administered to each household. It also affected the benefit amount reported in notification materials sent to households selected to receive the benefits. Because there were delays in finalizing the lists of demonstration participants, the grantee was able to make last-minute changes to procedures and notification letters without major consequences.

As a separate consequence of this prorating policy, EBT vendors were required to disable benefits midmonth in the last month of summer vacation, based on the start of the school year. Not all EBT systems are designed to easily accommodate this step, as standard practice disables benefits as needed at the end of each calendar month. As a result, at least one State will have to manually close out each SEBTC account on the day when benefits end.

4. Reconciliation of Benefits by EBT Vendors

FNS and the U.S. Treasury Department required that EBT vendors track, settle, and reconcile SEBTC benefits in a separate letter of credit from SNAP given that funding was coming from different sources. The RFA did not explicitly indicate this requirement, so grantees and EBT vendors did not develop plans to accommodate it. As a result, their budgets and timelines were challenged to address the issue when it was raised in early 2011 after the grants were awarded. The EBT vendors did develop solutions, however. The vendor for Connecticut was able to automate the settlement and reconciliation process, but the vendor for Missouri and Oregon had to develop a manual solution. Future grantees should be made aware of this requirement during the proposal phase to avoid these confusions.

C. Program Operations

The grantees experimented with new processes at both the State and local levels as they tackled activities for the demonstration. The evaluation’s technical assistance efforts uncovered a range of lessons on operational issues (see below). In addition, the POC grantees had already begun to reflect on their experiences in an effort to improve processes before the full demonstration year. Other States can benefit from the early experiences of the POC grantees as they consider applying for grant funds for the summer of 2012 and plan their proposed approaches.

1. Reconciling Program and Policy Differences Between NSLP/SBP with WIC or SNAP

One of the key challenges about issuing the SEBTC benefit is that it necessitates that two systems that generally operate separately—FRP meals eligibility and either SNAP or WIC—work together. This necessitates that different federal and State program rules and approaches, such as data requirements, be reconciled. It also means that officials who administer SNAP or WIC and those who administer school meals programs at the State and local levels had to work together, often for the first time. In many cases, there were unanticipated systems issues, related to the types of information required by SNAP or WIC and FRP systems, and different organizational cultures. During this POC year, grantees and their partners worked hard to overcome those inconsistencies and create a system where different programs worked together to achieve a common goal.
Although there were organizational challenges, all of the grantees and major partners were clear that the ultimate goal was the successful launch of the SEBTC program in the demonstration area. To achieve this goal, States took a range of approaches to dividing responsibilities across participating organizations. Yet State agencies in several sites appeared to have differing opinions on the success and appropriateness of those approaches, including questions about which State agency should serve as the official grantee.

2. Communication Flow

Communication with participating SFAs varied, creating some inconsistencies in how each SFA approached the development of lists of eligible children and households as well as the consent process. In States with only a single participating SFA, the SFA was an active partner from the start of the demonstration, and expectations for its involvement were clear. In States with more than one participating SFA, some of the SFAs appeared to have less information than what was ideal about what was expected of them. At the same time, grantees had less information than needed about how SFAs were approaching demonstration tasks at the local level. For future activities, grantees and their participating SFAs might benefit from more routine and clear communication about their expectations, approaches to tasks, and demonstration timelines.

3. Schedule and Pace of Activities

The pace of implementation was extremely fast in this POC year. Grants were awarded in December, and summer benefits were to begin in early to mid-June in the participating SFAs. With less than six months to complete preparations, the grantees displayed tremendous perseverance in their attempts to meet established schedules. In several sites, the timeline for implementation also coincided with a range of natural disasters and State budget crises that strained staff capacity. Despite these challenges, when facing issues or questions that needed resolution, they demonstrated an ability to adapt to change and generally communicated quickly and effectively to move the demonstration to the next stage in the process.

Yet, most grantees expressed frustration about the timeline, especially when new requirements emerged. Staff in these States and local areas felt that with more time they could have anticipated more challenges, developed more effective ways of conducting implementation, and tapped other resources within their States. In this first year, some steps in the implementation process took longer than expected, particularly the creation and cleaning of household files for random assignment. With this year’s experience, these grantees and the evaluation team now have a better understanding of each step in the process and the length of time required. They have also identified strategies to make early stages such as development of household lists more efficient.

4. Identifying Eligible Children and Creating Household Files

One of the greatest challenges that grantees faced during early implementation was the identification of eligible children and compilation of household lists. The grantees and SFAs anticipated the need to prepare lists of eligible children and had planned for that process. However, they encountered unexpected challenges with the data available in school systems. In particular, all of the lists submitted by grantees for random assignment had duplicate records for at least some children and needed to be reconciled.

The creation of household files using cleaned lists of eligible children was even more challenging, particularly for those SFAs that did not have a household identifier in the children’s
school records. Families that applied for FRP meals typically had an application number, but children who were directly certified were often not matched with other family members. Lack of standardization in local procedures for entering and updating names of guardians and household contact information also posed a challenge. Many of the data issues that emerged were unanticipated by nearly all of the grantees, and little guidance was given to SFAs about how to construct their lists. During the full demonstration year, the evaluation team will be more actively involved with States and SFAs in providing technical assistance during this critical stage. Grantees and participating SFAs also need to plan sufficient time and resources to clean their household data adequately.

5. The Outreach and Consent Process

All of the grantees were able to complete successfully the consent process and to obtain at least the minimum number of children and families needed to participate in the demonstration and evaluation. Most of the grantees were inexperienced with the process of obtaining consent. Despite their success, additional outreach in some sites might have helped encourage participation and yielded higher consent rates.

The issues encountered during the consent process differed between States that used active consent and those that used passive consent. Grantees that used passive consent were more likely to achieve high numbers of consenting households given that few families chose to opt out of the demonstration. However, over 10 percent of families in Missouri did not receive materials due to bad addresses and were removed from the study sample because they did not have a chance to opt out. The undeliverable mail also took several weeks to be returned. In Texas, mail with incorrect addresses was not returned to the grantee at the time of this writing, suggesting that some households may be included in the study who never received a consent letter. The concern of grantees at this phase is the extent to which families will use their benefits. Both grantees are actively promoting the benefit among the benefit group. Analysis of EBT records and survey data will measure take-up rates.

By contrast, the active consent process ensures that families received a consent letter and actively chose to participate in the random assignment process. This implies that the families are likely to use the benefit if they receive it. However, many households that would have desired the benefit in active consent sites may not have opened the consent materials or understood the information. As a result, consent rates for active consent sites were lower than some grantees anticipated, and the participating households may be atypical of the eligible population.

Another complicating factor was the number of SFAs involved in the demonstration. Site-visit interviews suggest that some SFAs, in sites where they were responsible for obtaining consent, put more efforts into achieving high consent rates than did others. In addition, grantees with multiple SFAs had to compile data collected in various ways and stored in various formats across districts. This resulted in significant data quality issues. Consistent guidance and additional technical assistance on consent activities and a template for providing data may improve the process during the full demonstration year.

6. Enrolling Participants

At the end of the school year, all of the sites had completed most or all of the steps needed to enroll participants in their State systems so benefits could be administered. Getting to that stage, however, was not without challenges.
For the grantees using the SNAP systems to issue SEBTC benefits, children who were randomly assigned to the benefit group and their parents or guardians had to be matched manually to the State database before benefits could be issued. This created the potential for human error and, indeed, resulted in problems. When multiple staff members were working on a single file, they were not always consistent in how they matched or updated information. In one State, cases were inadvertently duplicated or dropped from the list, although the mistake was identified and rectified. In addition, if children and guardians were not already in State eligibility systems, two States had to generate new identifiers or use dummies for data such as date of birth so the system would accept the case. This could create problems if parents lose their cards and need to replace them because State systems typically use date of birth as a personal identifier for this purpose. One State was unable to match 19 children to the system and had to drop them from the demonstration. Once households were matched to the State database, States had to manually enter cases either into their State eligibility system or the EBT administrative terminal to administer the benefit. Again, this manual process required significant staff time and was subject to data entry errors.

Grantees realized that the ideal scenario would have been to update their systems to allow automated matching or systematic database entry and quality assurance review as with other programs. However, time and resources did not permit this. Involving technical staff with knowledge of data systems and quality assurance processes may have prevented some of the issues encountered in the POC year.

To distribute cards to households, two States had to complete additional steps after the matching process was complete. One State had to request collect additional data (including social security number and date-of-birth of guardians) for households that were not already in their state system. This took both time and resources. By the end of the first week of benefits administration, 196 households had not returned this information and, therefore, had not been issued benefits. The other State required households to attend in-person training to receive their card. By the end of the first week, 354 households could not be reached or had not attended training despite repeated letters and phone calls by the grantee and its partners.

7. EBT System Modifications

All of the EBT vendors had completed systems modifications and testing in time to administer the SEBTC benefits at the start of the summer. As mentioned earlier, the greatest challenge for the EBT processors using the SNAP or SNAP hybrid approach was the issue of benefit settlement through a separate letter of credit. In the WIC States, developing the issuance file layout and working with poor-quality participant data were the greatest challenges. One State also experienced an error where cards were issued with an incorrect account number that did not match with the EBT processor’s system. This required the State to reissue approximately 1,250 cards after the end of the school year.

8. Budget Issues

During early implementation, several States reported that their grant budgets were not sufficient because they had not anticipated the level of effort required during the first few months of the demonstration. Most critically, States underestimated the effort required to coordinate under the tight project timeline, to prepare household lists, and to make EBT systems changes. To compensate for this, grantees were leveraging additional resources from State and local partners, despite working in States that were experiencing tremendous budget difficulties. In fact, one State did not budget any time for either of the lead State agencies. Additional guidance in the RFA for the full demonstration
would help States prepare more appropriate budgets and/or align leveraged resources during the planning phase.

D. Implications of the Early Months of SEBTC for the Evaluation

The evaluation team worked as quickly as FNS and the grantees during the POC year to refine the study design and coordinate its efforts with the grantees. As did the grantees, the team faced a number of unanticipated challenges along the way. Reflection on these early challenges revealed a number of ways the evaluation team can help grantees prepare household lists for the full demonstration phase and communicate data needs and requirements to grantees during the full demonstration year.

1. Design and Analysis Issues

**Definition of households and implications for random assignment.** As grantees and their participating SFAs began developing lists of eligible households, the definition of a household varied across grantees and sometimes among SFAs within local demonstration areas. Some grantees defined a household as anyone sharing an address; others defined a household based on the guardian. This influenced plans for administering the benefit. For example, if two sisters were living together and each had two children, one grantee could potentially issue the EBT card to one sister for all four children, whereas another site might issue separate EBT cards to the two sisters with benefits for only their own children. These situations were handled on a case-by-case basis, with the grantee using its best judgment about what to do.

For random assignment, however, the evaluation team needed to ensure that all children living together received the same assignment. It would undermine the integrity of the study if the household received the benefit for some children shared food with children in the household who were not assigned to receive the benefit. As a result, the study team aggregated households by address for the passive consent sites before conducting random assignment to ensure that households were not inadvertently split up. Then, after random assignment was complete, the team sent files back to the States that included the State’s original household groupings so they could appropriately notify households and administer benefits. However, after the lists were sent to the grantee, the evaluation team had to disaggregate these households again to avoid inadvertently contacting the wrong guardian for a particular focal child. These steps were done as well as possible, given the quality of the contact information, but some errors are inevitable.

**Data quality issues in files sent by grantees for random assignment.** As discussed earlier, the data files sent for random assignment had a range of data quality issues. The unanticipated task of cleaning these files required substantial communication with the sites and lengthened the time needed to produce final random assignment results. In addition, the quality of the data had implications for survey locating efforts given the extent of missing apartment numbers, phone numbers, and road types. The evaluation team will provide more technical assistance during the construction of these lists during the full demonstration year, encourage grantees to use standard data collection forms and structured databases that minimize out-of-range errors and duplicate entries, and explore the potential for using scanning technology to reduce data entry errors.

**Analysis of data across sites with active and passive consent.** During the POC year, the evaluation team will compare survey response rates and EBT take-up rates in active versus passive consent sites as well as identify potential site-specific factors that may affect estimates of food security outcomes. The impact analysis will look at pooled results across all sites. Although the
interpretation of results will consider the effects of active and passive consent processes, the study does not have the precision to detect site-specific impacts or subgroup impacts based on consent. Sample sizes in the full demonstration year will result in much greater power, and the interpretation of results will be much easier if all sites follow a uniform consent process.

2. Working with the Grantees

The evaluation team experienced a successful first six months working with the grantees, but both the study team and the grantees agree that there is opportunity to make improvements in the full demonstration year. In particular, more explicit information needs to be articulated to grantees about the expectations for their involvement in the evaluation. There should be consideration of the evaluation team providing additional guidance and technical assistance during the preparation of the household lists and the consent process. In addition, the evaluation team will work with the grantees to ensure the essential element of frequent and open communication. During the early implementation in 2011, brainstorming through routine exchanges was often the best strategy to solving problems under tight timelines.

Next year’s grantees can also learn from the experiences of the POC grantees. Plans are underway to hold a grantee meeting in early 2012 to explain the evaluation study, share POC experiences, answer grantees’ questions, and identify follow-up needs for technical assistance.

Development of MOUs with grantees. MOUs between the evaluation team and the grantee were created with the goal of outlining roles, responsibilities, and a time line for the demonstration. They also documented decisions in the event of staff turnover on either team. Although the documents are not legally binding, they reinforce a good faith effort by both groups. In the POC year, grantees were not aware of the need for an MOU until after they had been awarded the grant and began planning efforts. The documents had to be developed, and grantees needed to identify individuals at the State who would review and sign the MOUs within a very short time frame. Given that MOUs had to be signed and fully executed before the exchange of data could occur between the State and the evaluation team, the process would have been smoother with earlier communication.

Preparing sites for the baseline data collection schedule. The evaluation team kept sites informed about plans for the survey efforts through initial teleconferences and ongoing emails, and this process appeared to work well. Of particular importance was the fact that baseline survey efforts overlapped with grantee efforts to inform households about random assignment results. This created some confusion among families who received advance letters for the survey before they had learned about whether they were selected for the demonstration. Keeping the grantee teams aware of the survey time line was essential to preparing State and local staff to answer household questions during this period. Earlier completion of the consent and random assignment process would have reduced the overlap between the baseline data collection and the notification of households about their status in the demonstration, however this was not possible given the short time frame.

Providing guidance on data quality checks on household files. Neither the grantees nor the evaluation team anticipated the extent of data quality issues that emerged as SFAs developed lists of eligible children and households. The grantees had not outlined strategies in their proposals or planned during the application process for dealing with the complexities of this task. The evaluation team provided guidance as SFAs began pulling together their data and as State files were submitted for random assignment. However, more direct, upfront discussion with technical staff at the SFAs
as well as more direct and clear guidance from the team to the grantees about the challenges and potential data issues could have improved the process.

**Providing timely results from random assignment.** The process of providing results from random assignment took longer than expected for two main reasons. First, the process of diagnosing and resolving data quality issues took as long as several weeks in some sites. Second, several weeks passed in some cases before the evaluation team reviewed a grantee’s data files, because staff time was devoted to resolving issues on files submitted by earlier grantees. Once the files were cleaned to an acceptable level, the process of randomly assigning households to the benefit group took between two and five days. In the full demonstration year, the evaluation team will provide more guidance to sites to improve the quality of data and will also reconsider its staffing for random assignment tasks to handle each State’s files more quickly once they are received.

**Providing additional technical assistance on obtaining active consent.** The grantees that chose to conduct active consent had little or no previous experience reaching out to parents to obtain consent for a new program. As discussed above, SFAs were not always consistent in their approaches, and extra effort was required in some sites to achieve required consent rates. Additional communication between the grantee and SFAs as well as technical assistance from the evaluation team may have helped create consistency and implementation of best practices.

**E. Upcoming Activities**

This report is the first in a series of evaluation reports that will document the progress of the demonstration over time. The evaluation will continue to track the progress of grantees and their partners as they finish preparations for the summer and begin administering benefits. It will also begin to track household usage of SEBTC benefits and the food security of children in those households during summer 2011. In fall 2011, the evaluation team will produce a congressional report that describes implementation experiences through mid-July and early impact findings. A final report for the POC year will be delivered in early 2012 and will include complete results from the implementation, cost, and impact analysis.
REFERENCES


APPENDIX A

SEBTC FOOD PACKAGE IN SITES IMPLEMENTING THE WIC MODEL
### SEBTC Food Package in Sites Implementing the WIC Model

<table>
<thead>
<tr>
<th>WIC Food Group</th>
<th>Substitutes or Food Subgroups</th>
<th>WIC Package for 1-4 Year Olds</th>
<th>SEBTC Package</th>
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<td></td>
<td></td>
<td>Quality Unit</td>
<td>Quality Unit</td>
</tr>
<tr>
<td>Juice</td>
<td></td>
<td>128 oz</td>
<td>64 Oz</td>
</tr>
<tr>
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<tr>
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</tr>
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<td>36 Oz</td>
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<tr>
<td>Eggs</td>
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<td>1 Doz</td>
</tr>
<tr>
<td>Cash Value Voucher</td>
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<td>16 $</td>
</tr>
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</tr>
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<tr>
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<th>FYI 2011 Food Package Cost in Dollars ($)</th>
<th>FYI 2011 Food Package Cost in Dollars ($)</th>
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Total: $46.81 $60.06

Source: Provided by the USDA, FNS in December 2010.
APPENDIX B

CONSENT LETTERS DEVELOPED BY GRANTEES
March 2, 2011

Dear Parent/Guardian:

Would you like to have a chance to get extra money this summer to buy food for your children?

The (SFA) and the Departments of Social Service and Education have an exciting new program called *Summer Meals on the Move: Bringing Nutrition Assistance to Children’s Homes*, sponsored by the U. S. Department of Agriculture (USDA).

Families selected through a lottery will get an Electronic Benefit Transfer (EBT) card. **The card is worth $60 for each school-aged child for each summer month.** It can be used to buy food for the children at local stores.

**Who will receive Summer EBT for Children?** Children who get free or reduced price school meals in [DISTRICT] may be able to get it. But, there are more children who need the program than can get it. We will pick about 900 families to get the Summer EBT for Children

**How Can I get the Summer EBT for my children?** If you would like the chance to get this benefit, fill out and return the attached form to __________________________ by __________________________. Your name will be entered into a lottery with about 2000 other families from 23 communities in the northeast corner of Connecticut. Your information will be kept confidential.

Children picked to get an EBT card can also attend a Summer Food Program site. At these sites children get a meal and have fun with other children doing summer activities.

You may be asked to participate in a survey. If you consent to participate, the (___SFA___) will give Abt Associates, a national research firm your name, address, and phone number. We will also give Abt some information from your child’s school meal benefits. Abt or its partner, Mathematica Policy Research, will ask about 2,000 families in your area to do a phone survey in the next few weeks. You will get a letter about the survey first. The survey takes about 25 minutes. There will be a second survey during the summer.

If you have any questions about this, please call __________________________ at __________________________.

Sincerely,

_________________________
Food Service Director

Application to Apply for a Chance to Participate in

*Summer Meals on the Move: Bringing Nutrition Assistance to Children’s Homes*
Please print! If you receive more than one letter, please complete only ONE per family.

Information about your family:

Parent’s First and Last Name: ______________________________________

Address: _________________________________________

_________________________________________

Current Telephone Number: ______________________________

Children’s First and Last Name(s)*:

_________________________________________ □ check box if child living with you in the summer

_________________________________________ □ check box if child living with you in the summer

_________________________________________ □ check box if child living with you in the summer

_________________________________________ □ check box if child living with you in the summer

*List any additional children below

I give my permission for you to share my information with the Connecticut Departments of Education and Social Services, Abt Associates and Mathematica Policy Research.

________________________________   _________________

Parent/Guardian’s Signature     Date
MICHIGAN

Summer EBT for Children
Receive $180.00 in Groceries per Child

02/28/2011

Dear Parent or Guardian,

We want to help feed your children this summer! Grand Rapids Public Schools (GRPS) has an exciting new program called Summer EBT for Children (Summer Electronic Benefit Transfer for Children). This program is being provided through the joint efforts of the United States Department of Agriculture (USDA), Michigan Department of Education (MDE), Michigan Department of Community Health—Women, Infants and Children (WIC) and GRPS. Selected families in the program will get an EBT card that looks just like the familiar EBT Bridge Card. The card is worth $60.00 for each school aged child in your household for each summer month for a total of $180.00 for each child over the summer. It can be used to buy healthy foods for your children at authorized WIC local retailers.

Who will receive Summer EBT for Children? Children who are eligible to receive free or reduced price school meals in Grand Rapids Public Schools may be able to get it. But there are more children who need the program than can get it so we will pick about 1,650 families to receive Summer EBT for Children, using a random selection system. By returning the completed consent form (on the back of this letter), you will be included in the selection process and may very well be able to take advantage of these extra groceries.

What’s next? To participate, fill out and return the consent form (on the back of this letter) to your child’s school cook by March 9th. Your family will be entered to have a chance to get a Summer EBT card worth $180 per school aged child this summer! If you are selected, we will submit your information to WIC for mailing out of your Summer EBT card. Whether or not you decide to participate, your information will be kept confidential and your other government benefits will not be affected. Keep in mind, this Summer EBT card is yours to use for your children above and beyond any existing Bridge or WIC card you may have.

You may be asked to do a survey. About 2,000 families in our area will be asked to do a phone survey. The survey is being done by Abt Associates. Abt is a research firm. If you return this consent form (on the back), GRPS plans to give Abt Associates your name, address, phone number and other information listed on the consent form. If you return the consent form, Abt or its partner, Mathematica Policy Research, may call you to answer a survey. You will get a letter about the survey first. The 25 minute survey will take place this spring and again in the summer. All survey information will remain confidential.

WE NEED YOUR HELP. Your cooperation in this program not only has the potential of helping your summer food budget but also allows us to learn about new ways to provide summer food assistance directly to local families and their children. If you have any questions, please contact Paul Baumgartner at (616) 819-2135. Good luck and complete your form today!

Sincerely,

Paul Baumgartner
Director of Nutrition Services
Grand Rapids Public Schools

DUE MARCH 9th
To your child’s school cook.
Summer EBT for Children

**Consent Form**

O Yes, I would like to participate in the random selection for the Summer EBT for Children.

O No, I would not like to participate in the Summer EBT for Children.

Demographics for family # 12345

Last Name:
P/G Name:

O My children will be staying at the address below for the summer. If address/phone are not correct, please note changes here:

____________________________________________________

____________________________________________________________

Address:

Student information:

ID - Last Name, First Name

We MUST have your signature below in order to submit your family into the random selection process.

________________________________________________________________________

SIGNATURE of Parent/Guardian                      DATE

By signing this consent form, you are giving permission for the information above to be shared with WIC and Abt. WIC and Abt will also receive the following items from student records for each child: age, grade, gender, school attended, race/ethnicity, English language learner (ELL) status and school meal benefits.

Due March 9th to your child’s school cook.
FINAL DRAFT

Feb. xx, 2011

Dear <<Name from data base>>

Hunger doesn’t take a vacation! Send it packing this summer with an exciting opportunity for your children!

The <<SCHOOL DISTRICT NAME>>, the Missouri Department of Social Services, and the Local Investment Commission (LINC) have an opportunity to work with over 5,000 children this coming summer as part of a three-state state demonstration effort sponsored by the US Dept. of Agriculture, USDA.

We hope that your family and children will choose to participate. Here’s how.

How will it work?

- Selected families will receive $60 in food benefits per month for each school-aged child in their household. The $60 will come on EBT cards.
- Abt Associates, a national research firm will randomly select families from those who qualify for the Free and Reduced Lunch Program at your school.

Do I need to contact or mail anyone to be considered for selection?

- No, not at this time. If you received this letter, your household will have a chance to be part of the program. If you do NOT want to be considered, please return the enclosed post card by March 1, 2011.
- You may be asked to do a survey.

About 2,000 households will be asked to do a phone survey. LINC plans to give the Abt Associates your name, address, and phone number. Unless you refuse, Abt Associates may use this information to call you. We will also give Abt some information from your child’s record for school meal benefits. This information will be used to choose families to do the phone survey. Abt or its partner, Mathematica Policy Research, may call you to ask you to answer the survey within the next few months. You will get a letter about the survey first. Another phone survey will take place this summer. Each survey will take about 25 minutes.

What’s next?

- If you are chosen for the program you will receive a letter. The letter will explain the program and how to get the EBT benefit.

Thank you for considering this opportunity.

If you have questions, please call Robin Gierer at LINC, 889-5050 and we will be happy to help you and answer any questions.
Dear Parents:

An exciting project is coming to your area this summer! Your School District is joining the Department of Human Services (DHS) in a project. It gives families extra money for each child who gets free or reduced priced school lunches.

The purpose is to help families meet their food needs during the summer months. This is because not all schools provide summer meal programs. Also some summer meal sites may be hard to get to.

Families who want to be part of the project will be randomly chosen to be in one of two groups. The first group will get $60 per eligible child in most summer months. This benefit will be in the form of food benefits on an Electronic Benefit Transfer (EBT) card. If you are chosen to be part of this group benefits will begin June 6, 2011 and end September 5, 2011.

Some of the families not chosen to get the benefit will be asked to answer a survey. The group is a very important part of the project. They will not get the benefits but will help show ways to improve the project next year. The good news is your family will also have a chance to be chosen to get a benefit next summer. Both families that are chosen and not chosen to get a benefit can still go to a summer meals program if one is in your area.

Enclosed is a yellow page that contains more information about the project. Please read it carefully. The names of families will be chosen for the groups in March 2011. If you want to be part of this project, please fill out and sign the blue consent form. Return it to us in the enclosed postage paid envelope. We will let you know which group you will be in after we choose the families.

If you return the consent form DHS will give Abt Associates information that is listed on the blue consent form. Abt is a research firm. Abt or its partner Mathematica Policy Research will ask about 2,000 families in your area to do a phone survey in the next few weeks. They will first send you a letter. The survey takes about 25 minutes. There will also be a second survey in the summer.

Sincerely,

Diane Cretsinger, Nutrition Services Supervisor, Culver SD

Milli Horton, Food Service Director Sweet Home SD 55

Ed Curtis, Superintendent Central Linn SD 552C

Nichole Cooper, Administrative Secretary Santiam Canyon SD 129

Cecilia Swigart, Business Manager Sajo SD 95

Patti Jobe, Food Services Supervisor Jefferson SD 509J

Pam Lessley, Food Service Director Lebanon Community SD 9

Jaino Mayer, Child Nutrition Program Manager Greater Albany SD 8J

Debbie Darst, Business Manager Harrisburg SD

2011 Summer Electronic Benefits Transfer for Children (SEBTC)
SEBTC is a joint project of the United States Department of Agriculture (USDA), the Oregon Department of Education (ODE) and Oregon Department of Human Services (DHS),
Estimados padres:

¡Este verano llegará un emocionante proyecto a su área! Su Distrito Escolar va a trabajar en conjunto con el Departamento de Servicios Humanos (DHS) en un proyecto que les da a las familias dinero extra por cada niño que recibe almuerzos gratis o a un precio reducido en las escuelas. El objetivo es ayudar a las familias a satisfacer sus necesidades alimenticias durante los meses de verano. La razón es que no todas las escuelas ofrecen programas de alimentos para el verano. Además, podría ser difícil llegar a algunos de los sitios donde se ofrecen estos programas de alimentos.

Las familias que quieran formar parte de este proyecto serán ubicadas al azar en uno de dos grupos. El primer grupo recibirá $60 por niño elegible en la mayoría de los meses de verano. Los recibirán en la forma de beneficios de alimentos en una tarjeta de Transferencia Electrónica de Beneficios (EBT, por sus siglas en inglés). Si lo elegimos para formar parte de este grupo, los beneficios comenzarán el 6 de junio de 2011 y terminarán el 4 de septiembre de 2011.

A algunas de las familias que no sean elegidas para recibir el beneficio les pediremos que contesten una encuesta. El grupo es una parte muy importante del proyecto. No recibirán los beneficios pero ayudarán a mostrar maneras en que podemos mejorar el proyecto para el próximo año. La buena noticia es que la familia también tendrá la posibilidad de ser elegida para recibir un beneficio el próximo año. Tanto las familias elegidas como las no elegidas para recibir un beneficio pueden, de todas formas, ir a un programa de alimentos para el verano si hay uno cerca de su domicilio.

Invitamos una hoja amistosa con más información sobre el proyecto. Por favor saque con atención. Los nombres de las familias para los grupos se elegirán en marzo de 2011. Si usted desea formar parte de este proyecto, por favor llene y firme el formulario de consentimiento azul. Envíelo de regreso en el sobre con poste pagado que se adjunta. Le avisaremos en qué grupo estará después de que elijamos a las familias.

Si usted devuelve el formulario de consentimiento, DHS le dará a Alt Associates la información que figura en el formulario de consentimiento azul. Alt es una empresa que se encarga de realizar estudios. Alt o su socio Mathematica Policy Research le pedirán a alrededor de 2.000 familias de su área que hagan una encuesta telefónica en las próximas semanas, pero primero le enviarán una carta. La encuesta le tomará alrededor de 20 minutos. También se hará una segunda encuesta en el verano.

Alentaré,

Diana Crebsinger, Servicios Nutricionales
Supervisora del Distrito Escolar Culver

Milli Horton, Director del Servicio de Alimentos
Distrito Escolar 552C Central Linn

Ed Curtis, Superintendente
Distrito Escolar 552C Central Linn

Nicholas Cooper, Secretario Administrativo
Distrito Escolar 129 Santiam Canyon

Cecilia Swigart, Gerente Comercial
Distrito Escolar 9# Sio

Transferencia Electrónica de Beneficios de Verano para Niños (SEBTC) de 2011

SEBTC es un proyecto conjunto del Departamento de Agricultura de los Estados Unidos (USDA), el Departamento de Educación de Oregon (DOE) y el Departamento de Servicios Humanos (DHS) de Oregon.
2011 Summer Electronic Benefits
Transfer for Children (SEBTC)
Project Consent Form

Please fill out the information below and sign the form. This will give you a chance to be part of the project and receive food benefits during the summer months. Return it no later than February 28, 2011 using the blue postage paid return envelope.

**Parent information (please print)**

Parent's name (last, first middle): __________________________

Parent's date of birth: _________________ Phone number: _________________

Residence address: __________________________

Mailing address (if different): __________________________

Preferred language: □ English □ Spanish □ Other: __________________________

E-mail: __________________________

**Child information (please print):**

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<th>Name (last, first, middle initial)</th>
<th>Date of birth</th>
<th>Gender (M or F)</th>
<th>Grade level</th>
<th>School attended</th>
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Please use the back if you need to add more children.

About 2,000 families in your area will be asked to do a phone survey for the study. The survey is being done by Abt Associates. If you return this SEBTC Project Consent Form, the Department of Human Services (DHS) will share this information with Abt Associates.

If you return the SEBTC Project Consent Form, Abt Associates or its partner Mathematica Policy research may call you in the next few weeks to ask you to answer a survey. They will first send you a letter. The survey will take about 25 minutes. There will be a second survey in the summer.

By signing this form you are letting us know you want to be part of the project. You are also consenting to releasing your contact information to the Department of Human Services (DHS), Abt Associates and Mathematica Policy Research. Your information will only be used for the purpose of this project.

Signature: __________________________ Date: __________________________

SEBTC is a joint project of the United States Department of Agriculture (USDA), the Oregon Department of Education (ODE) and Oregon Department of Human Services (DHS).

SEBTC Consent (2/11)-1
Trasferencia Electrónica de Beneficios de Verano para Niños (SEBTC), 2011
Formulario de consentimiento del proyecto

Por favor llene la siguiente información y firme el formulario. Esto le dará la oportunidad de ser parte del proyecto y de recibir beneficios de comida durante los meses de verano. Envíelo a más tardar el 28 de febrero de 2011 en el sobre azul con franqueo pagado.

### Información de los padres (por favor use letra de molde)

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<tr>
<th>Nombre de uno de los padres (apellido, nombre):</th>
<th>Teléfono:</th>
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### Información del niño (por favor use letra de molde):

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<th>Nombre (apellido, nombre, inicial)</th>
<th>Fecha de nac.</th>
<th>Sexo (Hombre = H o mujer = M)</th>
<th>Grado</th>
<th>Escuela que asistió</th>
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Por favor escriba al dorso de esta hoja si necesita agregar más niños.

A alrededor de 2.000 familias de su área se les pedirá que contesten una encuesta telefónica para el estudio. La encuesta está a cargo de Abt Associates. Si usted nos envía este Formulario de Consentimiento para el Proyecto SEBTC, el Departamento de Servicios Humanos (DHS) compartirá esta información con Abt Associates.


Mediante su firma en este formulario, usted nos hace saber que desea ser parte del proyecto y da su consentimiento para que su información de contacto se dé a conocer al Departamento de Servicios Humanos (DHS), a Abt Associates y a Mathematica Policy Research. Su información sólo se usará con los fines de este proyecto.

Firma: ___________________________ Fecha: ___________________________

SEBTC es un proyecto conjunto del Departamento de Agricultura de los Estados Unidos (USDA), el Departamento de Educación de Oregon (ODE) y el Departamento de Servicios Humanos (DHS) de Oregon.

SEBTC Consent (2/11)-1
Frequently Asked Questions

1. **What is this project all about?**
   Oregon’s goal is to help reduce food insecurity and eliminate childhood hunger during the summer break from school. This project is being done in your area to see if using the Electronic Benefit Transfer (EBT) card to give food benefits to families during the summer months will help meet this goal.

2. **My kid’s school has a summer meal program, can I still apply?**
   Yes. These benefits are part of a special project. If your family is chosen, the benefits will be given to you on top of the current benefits. These will be extra benefits for your family during the summer months.

3. **How much will I get and how long will it last?**
   If your family is chosen you will get $60 per eligible child per month in most summer months. The project will start on June 6, 2011 and end September 5, 2011.

4. **Do I get the benefits in cash if my family is chosen?**
   No. The benefits will be on an EBT card. If you are currently getting Supplemental Nutrition Assistance Program (SNAP — formerly known as Food Stamp) benefits, your benefits will be on the card you already have. If you do not currently get SNAP, we will send you a card so you can use your benefits.

5. **I don’t want regular SNAP benefits; can I still get the benefits?**
   Yes. You do not need to be getting regular SNAP benefits to be chosen for this project.

6. **Where I can spend the benefits and what can I buy?**
   The EBT card can be used at any store that accepts it. This could be a grocery store, a farmers market, etc. The card can only be used for food. You will be able to buy the same things you can buy with SNAP benefits. You will not be able to buy things like alcohol, tobacco, cleaning supplies, etc.

7. **I don’t want anyone from the government to call me. Can I still get the benefits?**
   If you agree to participate in the project you are giving your consent to be contacted by Abt Associates. You will also have your information released to DHS to use for this project. Your information will be kept confidential and will only be used for this project.

8. **How soon do I need to turn in the form and when will I hear if my family is chosen?**
   You need to mail the form back by February 28th, 2011. We will be notifying you if you are chosen by mid-March 2011.

9. **If I have questions, who do I call?**
   If you have questions about the project, you can contact Donna Weaver by phone at (503) 945-6823 or via e-mail at dweaver@dhs.state.or.us.

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SEBTC is a joint project of the United States Department of Agriculture (USDA), the Oregon Department of Education (ODE) and Oregon Department of Human Services (DHS).
Proyecto de Transferencias Electrónicas de Beneficios de Verano para Niños (SEBTC)

Preguntas frecuentes

1. ¿De qué se trata este proyecto?
   El objetivo de Oregon es ayudar a reducir la inseguridad alimentaria y eliminar el hambre infantil durante las vacaciones de verano de la escuela. Este proyecto se va a realizar en su área para determinar si el uso de la tarjeta de Transferencia Electrónica de Beneficios (EBT) para entregar beneficios de comida a las familias durante los meses de verano ayuda a cumplir esta meta.

2. La escuela de mi hijo cuenta con un programa de alimentos para el verano, ¿puedo de todas formas solicitar los beneficios?
   Si. Estos beneficios son parte de un proyecto especial. Si su familia resulta elegida, estos beneficios se sumarán a los beneficios que usted recibe en la actualidad. Serán beneficios extra para su familia durante los meses de verano.

3. ¿Cuánto recibiré y durante cuánto tiempo?
   Si su familia es elegida, usted recibirá $60 por mes por cada niño elegible en la mayoría de los meses de verano. El proyecto comenzará el 6 de junio de 2011 y terminará el 5 de septiembre de 2011.

4. ¿Recibiré beneficios en efectivo si mi familia resulta elegida?
   No. Los beneficios se entregan en una tarjeta EBT. Si usted recibe en la actualidad beneficios del Programa de Asistencia de Nutrición Suplementaria (Supplemental Nutrition Assistance Program o SNAP – antes “Estampillas de comida”), los beneficios se le entregarán en la tarjeta que usted ya tiene. Si en el presente no recibe SNAP, le enviaremos una tarjeta para que pueda usar los beneficios.

5. Yo no quiero los beneficios SNAP regulares; ¿puedo recibir los beneficios de todas formas?
   Sí. No es necesario que usted esté recibiendo beneficios SNAP regulares para poder ser elegido para este proyecto.

6. ¿Dónde puedo usar los beneficios y qué puedo comprar?
   La tarjeta EBT se puede usar en cualquier tienda que la acepte. Puede ser un supermercado, un mercado, etc. La tarjeta sólo se puede usar para comprar alimentos. Usted podrá comprar las mismas cosas que puede comprar con los beneficios SNAP. No podrá comprar cosas tales como alcohol, tabaco, artículos de limpieza, etc.

7. No quiero que me llame nadie del gobierno. ¿Puedo recibir los beneficios de todas formas?
   Si está de acuerdo en participar del proyecto, estará dando su consentimiento para que Abt Associates se comunique con usted. Además, su información será divulgada a DHS para que la use en este proyecto. La información se mantendrá de forma confidencial y sólo será utilizada para este proyecto.

8. ¿Cuándo debo entregar el formulario y cuándo sabré si mi familia resulta elegida?
   Debe enviar el formulario por correo antes del 28 de febrero de 2011. Le notificaremos si es elegido a mediados de marzo de 2011.

9. ¿A quién debo llamar si tengo alguna pregunta?
   Si tiene preguntas sobre el proyecto, puede comunicarse con Donna Weaver por teléfono al (503) 945-6823 o por correo electrónico a dweaver@dhs.state.or.us

SEBTC es un proyecto conjunto del Departamento de Agricultura de los Estados Unidos (USDA), el Departamento de Educación de Oregon (ODE) y el Departamento de Servicios Humanos (DHS) de Oregon.
Dear Ysleta Parent,

I have exciting news to share with you! Because of our commitment to children’s health, Ysleta ISD was chosen to partner in a special project to help feed children during the summer months. As part of a competitive USDA grant award, Texas Department of Agriculture (TDA), Texas Department of State Health Services (DSHS) and West Texas Food Bank (WTFB) will test a new way of providing healthy food to children with the use of a Summer Nutrition Card in June, July and August 2011. We are proud to be one of five areas in the nation chosen for this important project. Because your confidentiality is very important to us, we are asking your permission to share some of your information.

For the project, participants will be randomly selected from Ysleta ISD. Some of those selected will be able to purchase healthy food at the grocery stores for their children using a benefits card (called a Summer Nutrition Card). Others will not receive a card, but will be chosen for a comparison group. About 2,000 families in Ysleta ISD will be asked to do phone surveys, conducted by the research firms, Abt Associates (Abt) and Mathematica Policy Research (MPR). You will get a letter before the first survey. A second survey will be done later in the summer. Each survey will take about 25 minutes.

To randomly select participants for the project, Ysleta ISD plans to give Abt your name, address, and phone number. We will also give Abt some information from your children’s record for school meal benefits. **If you do NOT want to be in this project or have Ysleta ISD give Abt your information, please sign the form on the back of this letter and return on or before February 28, 2011.** If you do not return the attached form to Ysleta ISD, Abt or its partner MPR may call you to ask you to answer a survey.

**If you want to be in the project, do not respond to this letter, and you will be entered into a random selection process.** By not responding to this letter, you agree to allow Ysleta ISD to share your name, address and phone number with TDA, DSHS, WTFB, Abt, and MPR.

**If you are selected to get the Summer Nutrition Card, you will receive notification and more details from West Texas Food Bank on or before March 9, 2011.** If you are selected to be in the comparison group, you will get a letter later in the spring from the Ysleta ISD.

If you have any questions or need additional information or assistance, please contact Child Nutrition Services at Ysleta ISD at 915-434-0120. We thank you in advance for your support.
and participation in this exciting project.

Sincerely,

Michael U. Vasquez
Ysleta ISD, Child Nutrition Director

If you do not want to be in this project, please sign below and return the form to:
Ysleta ISD, c/o Child Nutrition Services
9600 Sims Dr.
El Paso, TX 79925.

I do not want to be in this project

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<tr>
<th>Last Name</th>
<th>First Name</th>
<th>MI</th>
<th>Student ID Number</th>
<th>School Name</th>
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Signature  Date

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In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.
APPENDIX C

NOTIFICATION LETTERS DEVELOPED BY GRANTEES
Dear Parent/Guardian:

Congratulations! You have been selected to receive benefits under the *Summer Meals on the Move* program!

You signed up for a chance to participate in this exciting new program this past March. The (SFA) and the Departments of Social Service and Education are the agencies responsible for *Summer Meals on the Move: Bringing Nutrition Assistance to Children’s Homes*, which is sponsored by the U. S. Department of Agriculture (USDA).

The Department of Social Services (DSS) will send you an Electronic Benefit Transfer (EBT) card by the middle of June. DSS will deposit the money into an EBT account for you on June 17, 2011 and on the first day of July, August and September. You will be able to use your EBT card on or after June 17, but not before that date. The EBT card will look like the sample below:

![EBT Card Sample](image)

You will receive benefits for each school-aged child living with you during the summer. Benefits for June and September will be prorated because your child(ren) were in school for part of those months. Your benefit for June will be $26 per child. Your benefit for July and August will be $60 per child. Your benefit for September will be $12 per child.

You can use your EBT card to buy food for the children at stores that accept EBT. Most grocery stores in Connecticut accept EBT. DSS will send you more information with your EBT card, such as how to use the card and what foods you can buy with your benefits.

Your children may also attend a Summer Food Program site if you wish. At these sites children get a meal and have fun with other children doing summer activities.
In order to get started, we need some additional information about you, the parent or guardian, to create the benefit account for you. Please answer the questions on the enclosed registration form and send it back to __________________________ as soon as possible.

Once you receive your EBT card, you can activate it by:

- **If you have a Social Security Number,** you will need the last four numbers when you call 888-328-2666 to select a Personal Identification Number (PIN) and activate your EBT card. You will also use your SSN when you call for assistance with your account.
- **If you do not have a Social Security Number,** please call the Department of Social Services at 860-424-5756 or 860-424-5380 to start an alternate process for activating your EBT card and selecting your PIN.
- **If you currently receive (or ever received) help from the Department of Social Services** under any program, the Department may already have your Social Security Number. However, it would be very helpful, and would avoid unnecessary delays, if you could provide it on the attached registration form.

You may also be asked to participate in a survey. As part of the consent, your name, address, and phone number was given to Abt Associates, a national research firm. We will also give Abt some information from your child’s school meal benefits. Abt or its partner, Mathematica Policy Research, will ask about 2,000 families in your area to do a phone survey in the next few weeks. You will get a letter about the survey first. The survey takes about 25 minutes. There will be a second survey during the summer.

If you have any questions about this, please call EndHungerCT at 860-560-2100.

Sincerely,

_________________________

School Food Service Director
Information about you and your family:

(One) Parent or Guardian’s First and Last Name:
_________________________________________

Address:                                                                                           _________________________________________
                                                                                           _________________________________________

Telephone Number Where We Can Reach You:
                                                                                           ____________________________

Social Security Number for the above parent or guardian to be used to activate your EBT card
and obtain information or assistance with your EBT account:

Social Security Number:____________________________________________________________

If you have questions or concerns about giving us your Social Security Number or, again,
if you do not have one, please call the Department of Social Services at:

860-424-5756
Or
860-424-5380

Parent or Guardian’s Date of Birth: __________
(month/day/year)

Parent or Guardian’s Sex: _______ Male             _______ Female

Parent or Guardian’s Race: Please check all that apply
Asian (A)    ______
Black (B)     ______
Caucasian/White (C) ______
Native American (N) ______
Pacific Islander (P) ______

Are you Hispanic/Latino?   Yes ______  No ______

Number of Children in Household that attend Preschool – Grade 12: ______
Dear Parent/Guardian:

You signed up for a chance to participate in the *Summer Meals on the Move: Bringing Nutrition Assistance to Children’s Homes* this past March. The (SFA) and the Departments of Social Service and Education are the agencies responsible for *Summer Meals on the Move: Bringing Nutrition Assistance to Children’s Homes*, which is sponsored by the U. S. Department of Agriculture (USDA). Unfortunately, your family was not picked to receive benefits this summer. However, if the program is successful this year, 2500 additional children will be selected for the Summer of 2012 and your family may be picked then.

You can still play an important role in this program by participating in a survey. When you consented to participate, the (SFA) gave Abt Associates, a national research firm your name, address, and phone number. We will also give Abt some information from your child’s school meal benefits. Abt or its partner, Mathematica Policy Research, will ask about 2,000 families in your area to do a phone survey in the next few weeks. You will get a letter about the survey first. The survey takes about 25 minutes. There will be a second survey during the summer.

And don’t forget! Your children may still attend a Summer Food Program site if you wish. At these sites children get a meal and have fun with other children doing summer activities.

If you have any questions about this, please call EndHungerCT at 860-560-2100.

Sincerely,

_________________________
School Food Service Director
June 1, 2011

Dear [Parent/Guardian]:

Congratulations! Your household has been randomly selected to receive benefits from the Summer Electronic Benefit Transfer for Children (SEBTC) grant. The following child/children will receive benefits:

[NAME] [STUDENT #]

[NAME] [STUDENT #]

The program begins June 11, 2011, and will run for three months this summer. You will receive your SEBTC CARD by mail. Before you can use your card, you MUST call and activate your account by creating a PIN (Personal Identification Number).

When you call Customer Service to create your PIN, you will first be asked to select your language. The next selection will ask for the program. Be sure to choose #4, SUMMER EBT for CHILDREN. The messages you hear will reference the WIC card but apply to your SEBTC card also. To complete the activation process, you will need the zip code and birthday of your first student listed above.

Included with this letter are a FOOD LIST and your MONTHLY FOOD PACKAGE DETAILS. These will tell you exactly what food items you will receive each benefit month. The benefit months will run from June 11 – July 10, 2011, July 11 – August 10, 2011, and August 11 – September 10, 2011.

Also, a website has been created with training videos and resources. Please visit www.sebtc-mi.com to see this material. The website is designed to help answer any questions you may have about your benefits. If after visiting the website and reviewing the materials you still have questions, please call our Information Helpline at 616-819-1212. An informal question and answer meeting will be held on June 8, 2011, from 5:00 p.m. – 6:00 p.m. in the Union High School Auditorium, 1800 Tremont NW.

On behalf of the Michigan Department of Education, Grand Rapids Public Schools, the Michigan Department of Community Health WIC Program, and the United States Department of Agriculture - thank you for your cooperation during this process and congratulations!

Sincerely,

Michigan SEBTC Project Team
June 1, 2011

Dear [NAME]:

Thank you for completing the Summer Electronic Benefit Transfer for Children (SEBTC) selection process. As stated in the original letter, this grant project is limited to 2,500 children. Unfortunately, your household was not selected to receive a SEBTC food card this year.

Even though your child/children will not receive a card this year, you may still be part of the research study. With your help, we are hoping to expand this program for the summer of 2012 allowing even more children access to this opportunity.

On behalf of the Michigan Department of Education, Grand Rapids Public Schools, the Michigan Department of Community Health WIC Program, and the United States Department of Agriculture - thank you again for your cooperation during this process.

Sincerely,

Michigan SEBTC Project Team
Congratulations!

Your household has been selected to participate in the Summer EBT for Children demonstration funded by the U.S. Department of Agriculture (USDA).

As a family selected to receive Summer EBT for Children (SEBTC) benefits, you will need to know the following important things.

What will my family get?
You will receive $60 in food benefits for each eligible school-age child for June and July, and $32 for August (the benefit for August will be pro-rated to $32, because your child will return to school by Aug. 17 and will have free/reduced lunch available to them). For example, if you have one eligible school-age child, you will receive a total of $152 ($60 for June, $60 for July, $32 for August) for the summer months. If you have two eligible school-age children, you will receive $304. If you have three eligible school-age children, you will receive $456, etc.

How will my family get the $60 food benefit per child each summer month?
If you receive Food Stamp benefits or Temporary Assistance, your SEBTC benefits will be added to your Electronic Benefit Transfer (EBT) card. If you do not have an EBT card, your card will be mailed to you at your home address listed above. If you move before you are able to receive your card (in late May), please let us know your new address.

The EBT card works like a debit card at the grocery store. Receiving the SEBTC benefits will NOT affect your Food Stamp or Temporary Assistance benefits.

When will I receive the summer food for children funds?
The additional SEBTC benefits will be available on your card on May 31, June 30, and July 31.

What can I buy for my children with the SEBTC benefits on my EBT card?
The SEBTC benefits can be used to purchase food items anywhere Food stamps are accepted. You can buy any food item that is Food Stamp eligible. You are encouraged to purchase fresh, healthy foods for your children from local grocery stores and farmers markets during the summer months.

As a participant in this demonstration, you may be contacted by our partner Abt Associates, on behalf of USDA, who will ask you to answer some questions about your child’s food choices as well as general questions about you and your household. This survey should take no more than 25 minutes and you will receive a gift for participating.

This project is part of a federally-funded demonstration to give families with school-age children more resources for food needs during summer months when school is not in session. Missouri was one of five states selected to participate, and this benefit is only available to randomly selected eligible families in the Kansas City, Hickman Mills and Center school districts.

If the demonstration is successful this summer, there is a possibility the program will also be available during the summer of 2012 and expanded to serve more families.

If you have questions, please call (816) 410-8367.

Don’t let KIDS go HUNGRY in the SUMMER
¡Enhorabuena!

Su familia ha sido seleccionada para participar en el programa de demostración de EBT para Niños durante el Verano, financiado por el Departamento de Agricultura de los EE. UU. (USDA, por sus siglas en inglés).

Como familia seleccionada para recibir el beneficio de alimentos para el verano, necesita saber las siguientes cosas importantes.

¿Qué es lo que recibirá mi familia?

Recibirá $60 en beneficios de alimentos por cada niño en edad escolar que reúna los requisitos durante los meses de junio y julio, y $32 durante agosto (el beneficio de agosto será prorrateado porque su niño regresará a la escuela antes del 17 de agosto y tendrá acceso al almuerzo gratis o al precio reducido). Por ejemplo, si tiene un niño en edad escolar que califica, recibirá $152 por los meses del verano. Si tiene dos niños en edad escolar que califican, recibirá $304. Si tiene tres niños en edad escolar que califican, recibirá $456, y así sucesivamente.

¿Cómo recibirá mi familia los $60 por cada niño cada mes de verano?

Si usted ya recibe la ayuda SNAP (Programa Complementario para Ayuda Nutricional, antiguamente conocido como cupones de alimentos) o Ayuda Temporal para Familias Necesitadas, los beneficios de alimentos para el verano se agregarán a su tarjeta de Transferencia Electrónica de Beneficios (EBT). Si no cuenta con una tarjeta EBT del programa SNAP, se le enviará la tarjeta por correo a la dirección que se indica más arriba. Si se muda antes de que reciba su tarjeta (a finales de mayo), comuníquese con nosotros y denos su nueva dirección.

Esta tarjeta funciona como una tarjeta de débito en la tienda de alimentos. El hecho de que reciba los beneficios de EBT para sus hijos durante el verano NO afectará sus beneficios de SNAP ni de Ayuda Temporal.

¿Cuándo recibirá los fondos para los alimentos de mis hijos durante el verano?

Los fondos adicionales para el verano estarán disponibles en su tarjeta el 31 de mayo, el 30 de junio, y el 31 de julio.

¿Qué es lo que puedo comprar para mis hijos con los beneficios de alimentos para el verano de la tarjeta EBT?

Los beneficios de alimentos para el verano pueden usarse para comprar artículos alimenticios en cualquier lugar donde se acepte cupones de alimentos. Puede comprar cualquier artículo que reúna los requisitos bajo el programa SNAP. Se le anima a que compre alimentos frescos y saludables para sus hijos durante los meses de verano en cualquier tienda de alimentos o mercado de agricultores.

Como participante en este programa de demostración, puede que nuestra empresa afiliada, Abt Associates, se comunique con usted, en nombre de USDA, y le haga preguntas sobre la preferencia de alimentos de su hijo y también preguntas relacionadas con usted y su unidad familiar. La encuesta durará menos de 25 minutos y recibirá usted un regalo por participar en la misma.

Este proyecto es parte de una demostración financiada por el gobierno federal para darles a las familias con niños en edad escolar más recursos para las necesidades alimenticias durante los meses de verano, cuando no hay escuela. Misuri fue uno de los cinco estados seleccionados para participar y el beneficio está disponible para familias elegidas al azar y que reúnan los requisitos en los distritos escolares de Kansas City, Hickman Mills y Center.

Si este programa de demostración tiene éxito este verano, existe la posibilidad de que también esté disponible durante los meses de verano del año 2012 y que el mismo sea ampliado para servir a más familias.

Si tiene preguntas, sea tan amable de llamar al (816) 410-8367.
Dear:

Recently, the Kansas City, Mo. School District and LINC sent you a letter about the possibility of your family being selected to participate in a new U.S. Department of Agriculture (USDA) Summer EBT for Children demonstration.

Your family was not selected to receive this summer food benefit. Enrollment was limited to 2,500 children across three school districts, and we had many families interested in receiving the benefit.

**There is a way that you can participate and help the project be successful.** You may be contacted to participate in a short phone survey. The survey should take no more than 25 minutes and **you will receive a gift for participating.** Our partner Abt Associates, on behalf of USDA, may be calling you sometime in the next month or two.

Even though you will not be receiving this particular summer food benefit for your school-age children, there are summer food sites around the Kansas City area available to your children. To find a site:

- Visit [http://www.dhss.mo.gov/living/wellness/nutrition/foodprograms/sfsp/index.php](http://www.dhss.mo.gov/living/wellness/nutrition/foodprograms/sfsp/index.php)
- Or call 1-888-435-1464.

The health and nutrition of children will continue to be an important issue in our community. We look forward to working with you to improve the lives of our children.
3 de mayo, 2011

Hace poco tiempo el Kansas City, Mo. School District y LINC le enviaron una carta sobre la posibilidad de que su familia fuera seleccionada para participar en un nuevo programa de demostración de EBT* para Niños durante el Verano, auspiciado por el Departamento de Agricultura de los EE. UU. (USDA, por sus siglas en inglés).

Su familia no fue seleccionada para recibir los beneficios de alimentos para el verano. La inscripción estaba restringida a 2.500 niños de tres distritos escolares y recibimos peticiones de muchas familias que estaban interesadas en el programa.

**Hay una manera en la que usted puede participar y ayudar para que el programa tenga éxito.**

Puede ser que le llamen para participar en una breve encuesta telefónica. La entrevista no durará más de 25 minutos y **usted recibirá un regalo por participar en la misma**. Puede ser que la empresa asociada con nosotros, Abt Associates, le llame en nombre del USDA el mes que entra o el siguiente.

Aunque usted no recibirá este beneficio de alimentos para el verano en particular para sus hijos en edad escolar, hay lugares dentro de la zona de Kansas City donde se proveen comidas durante el verano que están a la disposición de sus hijos. Para buscar uno de estos lugares:

- Visite la página web: http://www.health.mo.gov/living/wellness/nutrition/foodprograms/sfsp/index.php
- O llame por teléfono al número 1-888-435-1464.

La salud y nutrición de los niños seguirá siendo un asunto importante dentro de nuestra comunidad. Esperamos poder continuar trabajando con usted para mejorar la vida de nuestros hijos.

*EBT = Transferencia Electrónica de Beneficios

**no permita que los HIJOS tengan HAMBRE durante el VERANO**
May 18, 2011

Dear Parent,

Enclosed is your Summer Electronic Benefit Transfer for Children (SEBTC), EBT card for the “I eat, I play, I’m healthy” project. Also enclosed is a brochure on how to use your EBT card.

Your children’s benefits will be put in an account set up just for you. The EBT card is a safe, easy and convenient way for you to get your benefits each month. Your card number is listed on the front of the card. Please call the toll free number on the back to set up your Personal Identification Number (PIN). Be sure to sign the card on the back. Whenever you use your card, enter your PIN number. Keep your PIN secret. Memorize it! Don’t share it with anybody.

The SEBTC benefits for your children will start June 7, 2011 and end September 5, 2011. If you have any questions about the SEBTC project, please contact Donna Weaver at 503-945-6823.

SEBTC Evaluation Liaison
CAF Food Stamp Program

Enclosures (2)
March 31, 2011

Dear Ysleta Parent,

Congratulations! You have been selected to participate in the Summer Nutrition Card Pilot. As a participant in this pilot, you will be able to purchase healthy food for your children at Texas grocery stores from June 1 through August 21, 2011. Our team here at West Texas Food Bank will work closely with you to make participation easy and convenient.

To get started, we need information from you to create your family’s Summer Nutrition Card.

- Please do the following before April 08, 2011:
  1. Verify your contact information below. If anything needs to be changed, please call the West Texas Food Bank at (915) 595-1060.
  2. If any of your children participating on the Summer Nutrition Card will not be living with you from June 1st – August 21st, you can request that the food for those children be removed from your family’s original Summer Nutrition Card, and put onto a separate card. If you need to request a separate card, please call the West Texas Food Bank at (915) 595-1060.

- Other important information you should know:
  1. In order to get your card, you must receive training on how to use the Summer Nutrition Card.
  2. The West Texas Food Bank will contact you soon to schedule your Summer Nutrition Card training class. There will be many classes to choose from.
  3. You may be contacted by our research partners, Abt Associates and Mathematica Policy Research on behalf of USDA. They will ask you to answer some questions about your child’s food choices, as well as general questions about you and your household. You will receive a gift for answering the survey.
  4. We and our partners will keep your information confidential as required by law.
  5. Participation in the Summer Nutrition Card Pilot will not affect any other benefits you may receive from other programs.

If you have any questions about this pilot, concerns, or need to update your contact information, please call your Summer Nutrition Card customer service team at the West Texas Food Bank at (915) 595-1060.

Placeholder for Contact Information (to be verified):

Name
Address
Phone

Signatures ___________________________    Signatures ______________________________