



October 4, 2024

The Honorable Kelly Garcia
Director
Iowa Department of Health and Human Services
1305 E Walnut Street
Des Moines, IA 50319

Dear Director Garcia:

Thank you for your August 15, 2024, letter to the Food and Nutrition Service (FNS) Midwest Regional Office through which you submitted a 2025 Summer EBT Interim Plan for Operations and Management (iPOM) for the State of Iowa and requested a waiver to operate a summer demonstration project. FNS shares your goal of expanding summer nutrition for children in Iowa and ensuring that healthy food reaches children in need.

FNS evaluated the submission as a proposed demonstration project, as it did not represent a plan for operation of Summer EBT. The proposed demonstration project also does not implement the goal of Summer EBT, or SUN Bucks, which is to provide families with \$120 per eligible child per summer to buy food through established retail channels using existing systems and data to easily reach eligible children while reducing administrative burden. Rather, it is an alternative approach which would provide food boxes through site-based and delivery models.

After careful review, we have determined that FNS is unable to approve the proposed demonstration project for the following reasons:

1) The evaluation of more than a decade of Summer EBT demonstration projects has

already found Summer EBT to be a proven strategy¹ that significantly reduced hunger and improved diet quality. FNS demonstration authority under section 749(g) of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010 (Public Law 111-80), allows FNS to approve projects to develop and test methods of providing access to food for children in urban and rural areas during the summer months. The goals of any demonstration projects funded under this authority are to find ways to reduce or eliminate food insecurity and improve the nutritional status of children. Research from more than a decade of rigorously evaluated Summer EBT demonstration projects found that Summer EBT is effective at both reducing food insecurity and improving diet quality. Evidence behind Summer EBT demonstration success was critical in informing bipartisan Congressional action via the Consolidated Appropriations Act, 2023 (Public Law 117-328), making USDA's Summer EBT demonstration project a permanent and nationwide program. The proposed demonstration project does not provide compelling evidence of the potential benefits of an untested alternative model rather than implementing the research-backed Summer EBT.

2) The nationwide Summer EBT program model has demonstrated capacity to reach eligible children. FNS anticipates that Summer EBT will reach as many as 21 million children in FY2024² via the provision of EBT cards directly to eligible families.³ Summer feeding strategies which rely upon site-based distribution, while extremely valuable sources of support to those who can access them, have historically had low levels of participation by eligible children, reaching less than four million children nationwide. Moreover, Summer EBT program participation in 2024 demonstrated that large scale, statewide implementation is feasible, underscored by 37 States, the District of Columbia, two Tribal organizations and five Territories successfully operating in summer 2024.

¹ [Summer EBT — A Tested and Effective Strategy for Ending Summer Hunger | Food and Nutrition Service \(usda.gov\)](#)

² [2024 SUN Bucks \(Summer EBT\) Implementing States, Territories and Tribes | Food and Nutrition Service \(usda.gov\)](#)

³ [SUN Bucks \(Summer EBT\) | Food and Nutrition Service \(usda.gov\)](#)

3) The existing suite of Summer Nutrition (SUN) Program options already provides a pathway for providing food via the site and delivery models contained in the proposal.

SUN Meals and SUN Meals to Go support providers who provide meals to children at designated locations, and those who provide meals via pick up or delivery, including the provision of bulk products designed to create meals for multiple days.

4) There is limited Federal funding to support summer feeding demonstration projects.

The Consolidated Appropriations Act, 2023, permanently authorized the rural non-congregate option in the Summer Food Service Program (SFSP), now known as SUN Meals to Go, and the availability of the Summer EBT program nationwide. At the same time, Congress stopped providing new funding for summer demonstration projects. There are also indications from Congress that fund balances available for these projects may be rescinded. The limited and uncertain fund balances would not be sufficient to support the demonstration project proposed by Iowa, based on the budget submitted.

FNS is deeply committed to supporting Summer EBT implementation through resources, technical assistance, and financial support. FNS's website contains a comprehensive set of guidance and technical assistance resources to support States in successfully launching and implementing Summer EBT.⁴ FNS is also providing \$100 million in Summer EBT Technology Grants that will provide significant resources, in addition to Summer EBT administrative funding, for critical technology investments that will ensure the operation of effective and successful Summer EBT programs.⁵ This funding is offered noncompetitively through an equitable allocation to all States, Territories, and Indian Tribal Organizations (ITOs) that plan to implement the Program in Summer 2025. There are two remaining dates for States to apply for this funding: October 15, 2024, and January 15, 2025.

⁴ [SUN Bucks \(Summer EBT\) Implementing Agency Resources | Food and Nutrition Service \(usda.gov\)](#)

⁵ <https://apply07.grants.gov/apply/opportunities/instructions/PKG00287559-instructions.pdf>

FNS stands ready to support the State of Iowa with the implementation of Summer EBT and expansion of USDA's existing Summer Nutrition Programs (SFSP), so we can reach more children with the nutrition they need over the summer and set them up for success. If you have questions, my staff and I are available to assist.

Sincerely,

A handwritten signature in cursive script that reads "Vista Suarez Fletcher".

Vista Suarez Fletcher, PhD, RD
Regional Administrator
Midwest Regional Office

cc: McKenzie Snow, Director, Iowa Dept. of Education