# **Summer EBT**

Challenges & Solutions with Data Quality & Systems



#### **Today's Agenda**

- Background
- Eligibility and enrollment
- Statewide Database
- Michigan's Plan for Success
- Code for America Research on State Systems





# Background

# Consolidated Appropriations Act, 2023

The law permanently authorized a **nationwide Summer EBT** program



# Launching in 2024! **Summer EBT**

Could benefit more than 29 million children



#### Interim Final Rule coming by year-end

# USDA issued early guidance and technical assistance resources:

# **USDA Guidance**

- ✓ Guidance for 2024 State Implementation of SEBT
- ✓ Guidance on SEBT Implementation in 2024 by Indian Tribal Organizations
- ✓ Guidance on SEBT Eligibility & Applications
- ✓ Guidance on SEBT Administrative Funding Process
- ✓ Guidance on Food Benefit Models for ITOs
- ✓ Implementation Toolkit
- ✓ Summer EBT Q&As



# **Guiding Principles for Summer EBT**

- Effectively deliver benefits to eligible families
- Streamline program administration
- Minimize burden on schools
- Provide states temporary flexibilities where needed/possible, as they work to stand up Summer EBT



# **Eligibility and Enrollment**

#### **Period for Establishing Summer EBT Eligibility**

 Households may establish eligibility for Summer EBT at any point between the start of the immediately preceding instructional year through the last day of the summer operational period



 Children certified as eligible for Summer EBT during the summer will be issued the full summer benefit regardless of the date of certification

#### **NSLP/SBP**

- -Applications
- -Direct Certification
- -Categorical Eligibility

Summer EBT Enrollment

Summer EBT Applications

All children eligible through Streamlined Certification

Duplicate Records Removed

**Issue SEBT** 

**SNAP** 

School Aged Children only

- -Foster\*
- -Homeless\*
- -Migrant\*
- -Runaway\*
- -Head Start\*

- -TANF\*
- -FDPIR\*

approved

-Other programs, including Medicaid, as

\* If the data for these programs is available at the state level, they must also be used to streamline certify children for SEBT.

#### What is School Age for Summer EBT?

#### Children enrolled in NSLP/SBP Schools

Children of any age who are enrolled in NSLP/SBP-participating schools if they are also eligible for free or reduced price school meals.

- Children of high school grade or under, including preschool-age children
- Students who are mentally or physically disabled, as defined by the State, and who are participating in a school program established for the mentally or physically disabled

#### Children not enrolled in NSLP/SBP schools

School-age means the years in which a child is required to attend school, or an equivalent program as defined by State or Tribal law.

Also known as the age requirement for compulsory education.



# **Applications**



# Statewide Application Requirement





#### **Statewide Database**

#### **Statewide Database**

By 2025, Summer EBT agencies will be required to establish and maintain a State- or ITO-wide database of children who are enrolled in NSLP- or SBP-participating schools





#### **Statewide Database Requirements**

- Child's Name
- ✓ Date of Birth
- ✓ School or District
- Mailing Address
- ✓ Individual Free or Reduced Priced Eligibility

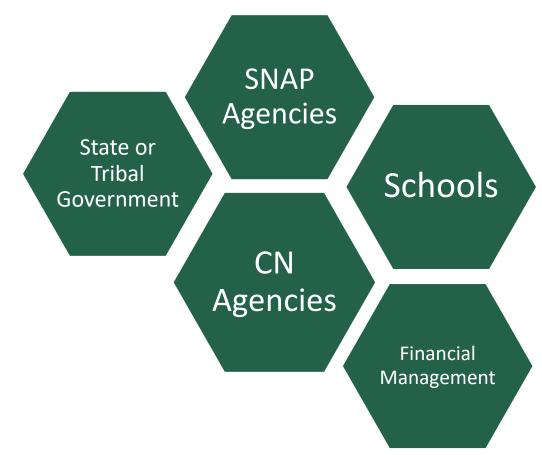
# **Working Across Entities**

#### **Collaboration**



#### **Key Requirements to Success**

- Statewide application
- Database with all children enrolled in NSLP/SBP schools



# Leveraging Student Data for Summer EBT in Michigan

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## Summer EBT in Michigan- Why

- Estimating 900K eligible students
- Goal #3- Improve the health, safety, and wellness of all learners
- Compliments the Summer Food Service Program (SFSP) and Rural Non-Congregate SFSP









# Summer EBT in Michigan- Partnerships

- Department of Health and Human Services (MDHHS) is the lead agency for Summer EBT
  - MDE is the partner agency
    - Student level data is provided by the Center for Educational Performance and Information (CEPI)
- These strong relationships are critical for the success of the program
- MDE is hosting a day-long meeting to bring all partners together







# Center for Educational Performance and Information

• CEPI was established by the Michigan Legislature (Sect. 94a of the State School Aid Act) to coordinate the collection, management and reporting of education data, from early childhood through K-12 and postsecondary education, and into the workforce.

- CEPI's mission is to:
  - Reduce Data Collection Burdens
  - Transform Education Data
  - Increase Efficiency







#### Michigan Student Data System

- CEPI Application used to collect student data
- Leverage existing student data collection processes for Summer EBT rather than incorporate a separate manual process.
- Existing data collections
  - General Collections (Fall, Spring, and End of Year)
    - K-12 and special populations
  - Early Childhood Collections (Fall, Spring, and End of Program)
    - PreK programs (i.e. Head Start, Great Start Readiness Program)
  - Nonpublic School Student Roster Collection (School Year)





# K

## Relevant Data Collected at Student Level

- Personal Demographics
  - Name, UIC, DOB, Gender
- Contact Information
  - Address: Physical, Mailing
- Supplemental Nutrition Eligibility Component
  - Eligible Free
  - Eligible Reduced
  - Direct Certification Extended Eligibility
- Homeless Demographic Component
- Early Childhood Program







#### Directly Certified Students

- Students in MSDS are eligible to match with MDHHS data for direct certification
  - SNAP
  - TANF
  - Medicaid Free
  - Medicaid Reduced
  - Foster
- MDHHS data pull and matches occur approximately every 2 weeks
- Districts can pull their Direct Certification Student Status Report from MSDS







#### **Directly Certified Students**

Center for Educational Performance and Information - Michigan Student Data System

#### **Direct Certification Student Status**

2023-2024

ISD Ingham ISD (33)											
Distri	ct La	nsing Pu	blic School Dist	rict (33020)							
Building 00561 Cavanaugh School											
UIC		EligCat	Last Name	First Name	Middle Initial	DOB		Gender	Student Number	Exit Date	Eligibility Date
5	261	S	/		N	0(	7	F	419676		7/24/2023
3	792	S	,			0:	6	F	419465		7/24/2023
<u>3</u>	)77	S	7		G	1(	9	F	424947		7/24/2023
1	594	M	,		I	10	5	F	420215		7/24/2023
1	521	S	,		L	0	6	М	426122		9/18/2023
1	)56	S	,		L	0:	6	М	426123		9/18/2023
6	188	S	7		а	0(	4	М	409917		7/24/2023
7	210	S	,		F	1	3	М	410913		7/24/2023
3	200	S	,		Р	0	7	F	421812		9/18/2023
5	390	S	7		М	0	8	М	425962		9/18/2023
3 5 9	354	S	,		R	1:	4	М	418807		7/24/2023
5	386	S	,			0:	5	F	414666		7/24/2023

#### NOTES:

- S = Student is certified via Supplemental Nutrition Assistance Program (SNAP). Benefits can be extended to other children in the same household.
- T = Student is certified via Temporary Assistance to Needy Families (TANF). Benefits can be extended to other children in the same household.
- F = Student is a foster child. Benefits cannot be extended to other children in the same household.
- M = Student is certified via Medicaid Free Meals. Benefits can be extended to other children in the same household.
- R = Student is certified via Medicaid Reduced Price Meals. Benefits can be extended to other children in the same household.







# Data Quality

- CEPI Data Quality Team
  - Policies, Processes and Practices that control our data and ensure quality
  - Data quality emails are generated 2-3 times a collection
    - Identify anomalies, compare data volumes to previous collections, provide summaries
    - More than 10 DQs are DC/SNE/Economically Disadvantaged related
      - Sent DQs
        - DQ1027- Supplemental Nutrition Eligibility Counts for CEP Buildings: Significant Decreases
        - DQ1028- Supplemental Nutrition Eligibility Counts for CEP Buildings: High Count
        - DQ1029 -Supplemental Nutrition Eligibility (SNE) Student Count Comparisons: Significant Decreases
        - DQ1030 -Supplemental Nutrition Eligibility (SNE) Student Count: Rate is Less than 10 Percent.
        - DQ1901 -Supplemental Nutrition Eligibility (SNE) Student Count Comparisons: Significant Increases
        - DQ2011 -Economically Disadvantaged Summary includes all economically disadvantaged categories with deduplicated aggregates and includes a 2-year comparison (Direct Cert, SNE free, SNE reduced, SNE extended, migrant, homeless)
      - Internal DQs
        - DQ1902 Supplemental Nutrition Eligibility (SNE): Ratio of Reduced-Price Lunch Counts to Free Lunch Counts
        - DQ1903 Supplemental Nutrition Eligibility (SNE) Comparison with Direct Certification
        - DQ1907 -Large decreases in SNE not picked up DQ1029 (threshold 10 percent)
        - DQ2205 -SNE Extended Eligibility District Summary
        - DQ2012 -District decrease in poverty
        - DQ2013 -District increase in poverty







## Community Eligibility Provision (CEP)

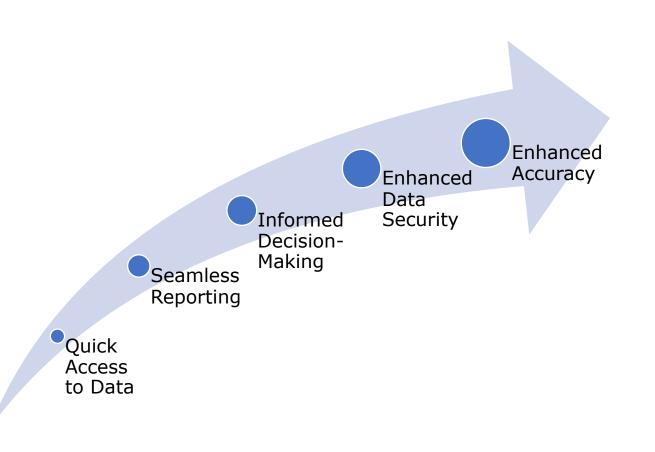
- CEPI General Collections are used for CEP notifications and eligibility postings and posted by MDE
  - Fall collection for district level eligibility posting
  - Spring collection for site level eligibility posting
- CEPI spring data is available in the Coordinated Application, making it simple to apply/reapply for CEP
- Nonpublic schools do not report in the general collection, but use Nonpublic School Student Roster Collection







#### Student Data Collection Benefits











### Student Data Collection Challenges

Data is self reported by parents/guardians

Data is self reported by schools

SOM reporting requirements

- Reliability
- Incomplete or inconsistent information
- Language and cultural barriers
- Engagement and response rates

Technology

Staffing

 Validation and verification

Privacy

 Legislatively required three times per year









#### Summer EBT and Student Data

#### Summer 2024

- Direct Certification data
- Free/Reduced Application data (from MSDS)
- Education Benefits form (Alternate Income formfrom MSDS)

#### **Summer 2025 and Beyond**

- Direct Certification data
- Free/Reduced Application data (from MSDS)
- Statewide Summer EBT application







# Summer EBT Keys to Success

School Engagement

**Efficient Planning** 

Learn & Adapt

Public Communication & Outreach Stakeholder Engagement



12/5/23





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