

**Summer Electronic Benefits Transfer for Children (SEBTC)  
(SNAP and WIC Models)  
Request for Application (RFA) Questions and Answers**

**Defining the Summer Period**

- 1. Is it possible for the summer period to be established as 6-1-11 through 8-31-11? Although the State has the ability to issue in partial months. As the school year ends near the beginning of June and begins near the end of August, the cost of benefits for a week in June and a week in August will be outweighed by the benefit we will deliver to participants.**

The intent of the demonstration project is to provide benefits to children when they do not have access to free or reduced price school meals during the summer when school is not in session. If the State agency has the capability to issue benefits in partial months, this approach is preferred.

- 2. According to page 10 of the RFA, activities should be scheduled so that food purchasing by households may begin as near as possible to the first day after the last day of the 2010/2011 school year. Benefits shall expire at the end of each month or 30 day issuance period. Ideally, final benefits shall expire as near as possible to the day before the 1st day of the 2011/2012 school year. Will proposals with benefits based on a full calendar month be acceptable?**

Covering only the period when school is not in session is preferred, but a full calendar month is not strictly excluded.

- 3. Since the last day of school varies by town, and sometimes even by school, which date is the date we must use to determine the begin date for SEBTC?**

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.

- 4. What will the formula be for prorating SEBTC benefits issued in the initial month of the program? Most schools in the State end for the year in the second or third week in June.**

If the State has pre-established rules for proration in either SNAP or WIC, these rules would apply. Generally, the rules should be established so that if school is not in session

for 3 months (13 weeks) application of the rules would result in exactly 3 full months of benefit issuance.

## **Evaluation**

- 5. It is unclear in the RFA as to when evaluator coordination will take place. This is important because there are questions on the methodology to be used to select who will participate in the treatment group and who will participate in the control group. Do we contact all 10,000 potential participants then use some form of random sampling to select 2500 for treatment and 2500 for control?**

FNS expects that the evaluation contractor will be selected by the end of November. The timing of coordination will be up to both the Awardee and the evaluator but can probably start in earnest in January 2011. While we do not yet know how the evaluation contractor will approach random assignment, FNS sees two potential alternatives for the random assignment in 2011. The first, as you write, starts with contacting the households of all 10,000 potential participants and following up with random assignment into treatment and control. The second alternative would start with drawing a random sample of 5,000 participants (from the 10,000) and then doing a second random sampling (of the 5,000) into treatment and control.

- 6. Please define the role “evaluation liaison” as identified in the section addressing Evaluation Cooperation. Does this individual need to be associated with the Lead SA or could this individual be associated with the partnering SA?**

The evaluation liaison may be associated with either the lead State agency or a partner State agency. The person identified as the evaluation liaison for the demonstration project must have authority to effectively coordinate State agency demonstration project activities with the evaluation contractor selected by FNS, and both agencies must agree to work with the liaison.

- 7. What kind of pre-demo data is the evaluation contractor is expecting to get from the participating head of household?**

FNS is uncertain of specific data the evaluation contractor will need because evaluation proposals are currently under development. However, because changes in food security will be measured, FNS expects the evaluation contractor will need to collect information on household food security prior to the distribution of benefits through the demonstration project.

- 8. Based on the evaluation criteria, there may be a nutrition assessment of the children in the household – food choices, nutritional behaviors and Body Mass Index (BMI). Should a letter identifying this be included with an overview of the SEBTC card opportunity, and if so, should there be an agreement to participate in the evaluation process, along with the confidentiality waiver for signature? Is a household still**

**eligible if they decline to participate in above nutritional assessment and other evaluation processes?**

Along with an overview of the opportunity, the letter should indicate that the household's contact information will be given to the evaluation contractor who may request their participation in an interview. If contacted by the evaluator, households' participation in the evaluation interviews will be voluntary. Households that opt out of sharing contact information are not eligible to receive an SEBTC benefit; households that agree with sharing contact information will be randomly assigned to receive the SEBTC benefit (treatment group) or not (control group). Households in the treatment group get the SEBTC benefit regardless of whether they later agree to participate in the evaluation interview or not.

**9. Body Mass Index (BMI) was mentioned in the RFA. Will the evaluation contractor use current school data? Will the same data be collected for the treatment and control groups?**

FNS is not sure how the evaluation contractor will assess BMI because evaluation proposals are currently under development. The same data will be collected for both treatment and control groups.

### **Participation Benefits and Incentives**

**10. Is there some sort of incentive for participants in the control group to participate without receiving benefits?**

That has not been decided yet but the cost, if any, would be funded through the evaluation, not the demonstration project. The control group would only be participating in a household interview and so the dollar value of any incentive would be similar to ones typically allowed by the Office of Management and Budget (OMB) for federal surveys.

**11. SNAP benefits may not be used to purchase prepared foods. Can SEBTC benefits be used to purchase prepared foods?**

No, SEBTC benefits may only be used to purchase foods allowed under the regular SNAP.

### **Budget & Funding**

**12. May SAE money be used (allowable) in conjunction with monies from these demonstration projects? Or, will states be required to separate administrative expenses (e.g., personnel, indirect costs, etc.) that may apply to the administrative process?**

Yes, States may use SAE in conjunction with demonstration project funds for administrative costs. Whichever funds are used, States will be required to separately track expenses for all administrative activities (e.g., personnel, indirect costs) related to the demonstration projects. For example, State agencies may choose to use existing State agency staff to oversee the demonstration project. If State agency staff salaries are currently paid with SAE funds, the State agency must prorate the percentage of time spent on the SEBTC demonstration project and on other duties, and charge each account accordingly. In this example, if a staff person spends 50% of their time working on the demonstration project and 50% of their time on other duties, each account would be charged 50% of the staff person's salary. The same logic would apply to indirect costs and other administrative activities. All budgets submitted for SEBTC application should reflect how these costs will be prorated.

**13. The RFA doesn't address the level of start-up and operational costs. Is there a dollar figure ceiling established? This is critical for a realistic budget submission.**

There is no specific dollar ceiling set for start-up or operational costs for the demonstration projects. The costs set forth in State agency budgets for the project should be necessary and reasonable for operation of the demonstration project, and cover all participating entities (i.e., schools, lead and non-lead State agencies, and private partners, such as EBT vendors).

**14. Is it necessary to address non-federal resources, to include in-kind?**

FNS is interested in knowing the full scope of the resources necessary to initiate and operate SEBTC demonstration projects, including any non-Federal resources that are proposed to be used. Though we are interested in knowing about in-kind resources, there is no need for State agency applicants to place a dollar value on these resources in their applications.

**15. Will the approved funds be given to the State agency through a Letter of Credit?**

Yes.

**16. In SNAP, the EBT vendor will settle with the ASAP account. Would these SEBTC funds fall under the same SNAP account or separate account?**

The SEBTC funds would fall under a separate account because the SEBTC demonstration will operate under a grant agreement; it must be handled in accordance with grant rules which say the funds must be separated and not comingled.

**Staffing**

- 17. The basis of the SEBTC project is to capitalize on the expertise of those WIC agencies that have a fully functioning EBT system and those state Departments of Education that have qualifying free and reduce priced meal program in their school districts. A State may choose to propose incumbents to fill key roles so their background and experience may be utilized. For example, State X's demonstration director (25% time commitment) will also be the WIC program's deputy program manager. How can FNS pay the WIC deputy program manager at 100%, then the SEBTC project pay 25% for the same position?**

State agencies may choose to use contractors or existing State agency staff to oversee the demonstration project. If a State agency wants to use existing State agency staff whose salaries are currently funded with WIC funds or Child Nutrition State administrative expense funds, they must prorate the percentage of time spent on the SEBTC demonstration project and on other duties, and charge each account accordingly. In the example you use, you would charge 25% of the WIC deputy program manager's salary to the SEBTC project, and 75% to WIC funding. The WIC administrative funds currently used for the deputy program manager's salary would be available for other allowable uses. The same applies to positions currently funded with Child Nutrition State Administrative Expense Funds. All budgets submitted for SEBTC application should reflect how these costs will be prorated.

- 18. What is the role of the SNAP coordinator in this demo? Can this person be the demo director as well?**

The SNAP coordinator's role will depend on the State's proposed role for the SNAP coordinator. Yes, the SNAP coordinator may also be the demonstration project director.

### **Demonstration Area, Site Selection & Creating the Sample**

- 19. Is it required for the school food authority (SFA) selected for the SEBTC to also participate in SFSP? Or, is it acceptable for there to be SFSP sites in the general area that selected families may participate in that are operated by a separate SFA? If so, is there a maximum distance that area sites must be within for the SFA to be considered?**

There is no requirement that the SFA or SFAs selected for either SEBTC demonstration participate in SFSP (or the Seamless Summer option) if they are not doing so currently (that is, they do not need to start an SFSP program to participate in the SEBTC demonstration). If any of the selected SFAs are already participating in SFSP they do not need to stop doing so to participate in the SEBTC demonstration.

If an SFA that is not part of the demonstration operates SFSP sites within the geographic boundaries of the demonstration SFA(s), they may continue to do so and both treatment and control families may attend them if they choose.

Finally, there is no distance criterion.

FNS' evaluation contractor will be responsible for distinguishing among children who received food from both programs, or from just one of them.

**20. Can a site determination change after application has been submitted? Is there an absolute deadline? Sites for the State agency will be included/described per application requirements, however due to unforeseen circumstances, there may be a need to change site location after the application has been submitted but within sufficient time prior to the start of the demonstration.**

FNS will work with Awardees should such circumstances arise. However, applicants should ensure, to the greatest extent possible, that the proposed demonstration area will be able to carry out the demonstration project if selected. The RFA requests letters of commitment from proposed sites.

**21. Can a State choose SFAs with more or less than the specified number of school children in the proposal?**

A State could choose a SFA with more, but not less, than the number specified in the RFA (10,000 to 12,000 children certified for free or reduced-price meals).

**22. Would it be acceptable for the awarded SA to select a SFA in an urban area and an SFA in a rural area that collectively have 10,000-12,000 eligible children for comparative purposes? Or it is required to select either a SFA in an urban area meeting the criteria or multiple SFA's in the same general rural area that together meet the criteria?**

Applicants are free to propose any combination provided that the SFAs are contiguous and collectively have 10,000 to 12,000 eligible children. Applicants may propose one large (presumably urban) SFA or multiple contiguous rural SFAs or an SFA at the edge of an urban area plus an adjacent rural SFA, etc. Applicants cannot propose an urban SFA in one part of the State plus a geographically separate rural SFA in a different part of the State.

**23. Selection of Household Participants – are there any criteria or priority suggested for random selection process, i.e. directly certified students, free, reduced, etc.? Or, is random selection from all free and reduced eligible students within the selected SFA?**

No priority among potential participants will be used for random selection. FNS expects that random selection will be from all children certified for free or reduced-price meals within the selected SFA(s) and applicants should propose on that basis. The evaluation contractor will be selected by the end of November and it is possible that they may propose a research design that requires some slight variation (for example, a random

sample of free students and a separate random sample of reduced-price students in order to adjust the relative number of free and reduced-price children in the study).

**24. The process of selecting the 2,500 school children for Summer 2011 - are they from the pool of 10,000-12,000 children or from the pool of children whose parents have agreed to participate in SEBTC?**

The treatment and control groups will only be selected from the pool of children whose parents have agreed to participate in the SEBTC.

**25. Are children eligible because of their free or reduced-price lunch designation in October of the previous year?**

Any child certified eligible for free or reduced price meals during School Year 2010-2011 is eligible for SEBTC benefits, provided they are in an SFA in the demonstration area. Most students will be identified during the certification process conducted at the beginning of the school year, and reflected in October data. However, State agencies are encouraged to implement systems for the demonstration project that capture all children certified for free or reduced price meals during the year, including those identified after October.

**26. Will a child's benefit level or eligibility status change during the summer?**

No, the monthly benefit level at the start of the demonstration project will remain the same throughout the summer.

**27. Starting with a sample of 10,000 children could result in a treatment group of 2,500 and a control group of 7,500. Would we need to send 10,000 letters?**

There are two possible approaches for the first year of operation. You may contact the households of all 10,000 potential participants and later follow up with random assignment into treatment and control. The second alternative would start with drawing a random sample of 5,000 participants (from the 10,000) and then doing a second random sampling (of the 5,000) into treatment and control. (See also Question 5.)

**28. What if we send 5,000 letters to parents/guardians of children and only receive 3,000 responses? Will a second mailing or other outreach plans be required or will an expansion of the demonstration area be required?**

FNS will work with awardees and the evaluation contractor to negotiate challenges that may arise due to low response rates.

**29. How will the special provision schools (i.e., Provision 2 and Provision 3 schools) be treated in this demonstration? Are all students considered eligible for free and reduced-price school lunches? If not, and only the children who meet the eligibility**

**criteria for free and reduced-price school lunches are included in the demonstration project, how are they identified?**

Provision 2 and Provision 3 schools are not eligible to participate in these demonstration projects because student-level free and reduced-price eligibility data are not available. FNS may consider adding special provision schools in future years.

**30. Will households have an appeal process if the household is not selected to be in the treatment group?**

No.

### **Randomization**

**31. The guidance states the treatment group will be randomly selected by the contractor. The randomization process might not target the poorest families. Isn't that a problem? Can we target specific populations in our demonstration project to ensure we reach those who are most needy?**

Randomization is the best way to achieve the required robust evaluation of SEBTC projects. Targeting specific populations is contrary to randomization and will skew the evaluation.

**32. Has FNS considered a study design in which each participant would serve as her/his own control?**

No, true randomization is the most robust study design.

### **Demonstration Activities**

**33. Final Presentation of demonstration findings – where will this presentation take place?**

A final decision on where the annual meeting presentations will occur has not been made. In preparing their budgets, applicants should plan for these meetings to occur in Washington, D.C. for a 1.5 day duration.

**34. May the letter of consent (confidentiality waiver requests) also include the request for participation? The guidance states that explanation and promotion of the demonstration may be included in the letter but didn't address if the participation request could be included.**

Yes, the same letter that requests participation may also request a confidentiality waiver.

**35. Can a WIC or SNAP clinic be used to distribute EBT cards or can we mail them in a sealed envelope? Do either of those methods conflict with confidentiality? If participants pick-up EBT cards at an office, do we still need to collect the household contact information.**

These are the types of issues for which FNS is seeking solutions in these proof-of-concept projects. A person choosing to pick up an EBT card at a specific location is self-disclosing. Mailing EBT cards to a household residence in a sealed envelope would not violate confidentiality.

If participants pick-up EBT cards at an office, household contact information would still be needed for the evaluation.

**36. Can we proactively gather any data that the evaluator may need to streamline the process?**

No, FNS must secure the evaluation contractor before we are certain of which data need to be collected. Once the evaluation contractor is selected, FNS will discuss with the evaluation contractor and awardees the possibility of streamlining data collection.

## **EBT Integration**

**37. How large an area is the “interoperability” required – within state at a minimum, or is this based on existing EBT system process?**

Households receiving summer EBT cards must be able to redeem them for SNAP or WIC approved foods at any SNAP/WIC authorized retailer.

For SNAP, interoperability in SEBTC should mirror interoperability in SNAP based on the existing EBT system process. Families travel on vacation in the summer out of State with their children and should be able to use their SEBTC in any State. This should not be limited to within a State.

For the SEBTC-WIC model, WIC is not interoperable the way that SNAP is; for example a WIC participant cannot use their WIC benefits and shop in another state. They have to stay within the area of their WIC State agency. A WIC State agency is defined as a geographic state or Indian Tribal Organization (ITO).

**38. Would they need a new Bank Identification Number (BIN number), to separate the transactions in the SNAP ALERT system, or can they use their normal number?**

The State SNAP Agency should work with its EBT contractor to determine the best approach for the State on whether a new BIN is needed or not. Regardless of the

approach taken, the State must be able to distinguish between SEBTC redemptions and regular SNAP redemptions.

- 39. Benefits should be provided or loaded onto the EBT cards on a monthly or more frequent basis rather than in one lump sum at the beginning of the summer (page 11 of RFA). Will we be allowed to load three months of benefits at one time as long as the benefits for each month can only be redeemed in the month for which they are applicable?**

Yes. In WIC-model projects, benefits may be loaded on the EBT card at one time and made available for redemption during the month which for which they are intended. As currently practiced in WIC, benefits will expire at the end of each month. In SNAP-model projects, benefits may be loaded on the EBT card at one time and made available monthly. SNAP benefits, however, do not expire at the end of each month, so any remaining balance would carry over to the next month until the end of the summer, when SEBTC benefits will be expunged.

- 40. Would all SNAP and WIC EBT regulations (adjustments, card delivery timeframes, etc.) apply to SEBTC?**

Yes.

- 41. Is the State agency required to notify all retailers in the State or can it be only the retailers in the areas chosen for the demonstration?**

At a minimum, all retailers in the selected States must be informed of the demonstration project and provided information about the summer EBT cards that will be used.

## **Reporting**

- 42. The SF-425, SF-424A---are these new forms (State SNAP folks not familiar with them)? If not, who normally has done these (maybe Education)? If SNAP programs would have to do these, will there be some guidance for them on completion of these forms? Or would they somehow coordinate with Education to provide their information to them?**

Both the SF-424A and SF-425 forms are used regularly throughout the government grant process. The SF-424A form is a budgetary form that provides estimates of program cost; the SF-425 is only applicable to award recipients. If a SEBTC- WIC/SNAP grant is awarded, SF-425 will be filled out quarterly to provide an estimate of awarded funds used per quarter. The applying agency may collaborate with other partnering agencies to submit these forms.

- 43. If a treatment household contains more than one eligible child, that household will receive one summer EBT card loaded with the total benefits for all eligible children**

**(page 11 of RFA). Will USDA want reporting capabilities based on a household or individual?**

Household level reporting is sufficient.

**44. The applicant shall propose which entity(ies) will be responsible for developing and distributing the summer EBT cards and how data from participating households necessary to create and track the cards shall be collected and maintained (page 11 of RFA). What data elements will be required for reporting in WIC-model SEBTC projects?**

FNS is uncertain of specific data the evaluation contractor will need because evaluation proposals are currently under development. The data elements described below represent an estimate of what may be required, but is subject to change when an evaluation contractor is selected.

The State CN agency should supply the FNS evaluation contractor with a household ID#, the name and address of the parent or guardian and, for each eligible child in the household the child's name, gender, grade level, free/reduced price status, and total dollar benefit authorized (sum for all eligible children in household).

The State CN agency should supply the State WIC Agency or WIC EBT Processor with the household ID, name and address of parent/guardian, and total dollar benefit. Based on the dollar benefit the State WIC Agency should determine food package quantities.

For each SEBTC-WIC transaction, the State's WIC EBT Processor should supply the FNS evaluation contractor with a file that contains:

- Household ID
- Date of transaction
- Time of transaction
- ID of food store
- Name or ID of product purchased
- Quantity of product purchased
- Dollar amount of transaction

If a household containing eligible SEBTC-WIC children also participates in the regular WIC program the same transaction data should also be provided.

Transaction data can be supplied monthly or at the end of the summer.

The State should also supply a file on each authorized food store that gives: store ID, type of store (e.g., supermarket, convenience, etc.), name of store and street address (or at least ZIP code) of the retail location (not corporate HQ).

FNS expects SNAP-model projects will require similar reporting data, except there will be no specified food package in SNAP-model projects.

## **WIC-Model Food Package**

- 45. SEBTC (WIC model) food package will be limited to foods on the Approved Product List (from page 11 of RFA). Approved food items vary by State. Will this be considered when determining a SEBTC food package?**

The quantities will be specified in a manner similar to the WIC interim food package rule. The approved food package list of the selected SEBTC: WIC State(s) will apply within their jurisdiction.

- 46. The food package quantities have not been set definitively because FNS is aware of several questions surrounding the appropriate level and timing of the benefit and wants input from applicants in regard to the following: economies of scale and impact on food retailers (page 11 of RFA). Will States utilizing max price and least expensive brand (LEB) for existing nutritional programs be allowed to apply those same practices to SEBTC?**

Yes.

- 47. Are ideas regarding the yet-to-be-determined food package from applicants a required component to include in the application or is the intention for States to submit them later, after the application process?**

At a minimum, the application should indicate the constraints of your system. FNS will determine the contents of the food package.

- 48. Will there be different food packages for different aged children?**

No, for these proof-of-concept demonstration projects there will be one food package for all children, regardless of age.

- 49. Will the food package use the same WIC foods?**

Yes, FNS will determine the food package by adding and/or deleting food items from the food package currently used for the oldest WIC children.

- 50. Will the food package contain a specific amount for purchasing fruits and vegetables?**

Yes, there will be a dollar value set aside for fruit and vegetable vouchers.

## **Replacing Lost or Stolen Benefits**

**51. Will lost or stolen SEBTC benefits be replaced?**

Under SEBTC, the treatment of lost or stolen benefits and lost or stolen cards should be handled the same as in the regular SNAP or WIC program.

**Transferring Benefits**

**52. What if one child (of three children, for example) in a household goes to stay with a relative for the summer? What happens to their benefits?**

If the State agency or SFA is aware of such circumstances, we recommend they issue separate SEBTC cards—one for the child leaving the area for the summer, and another for the children remaining in the area with the rest of the household. If this happens without State agency or SFA knowledge, which is highly likely, the SEBTC benefits would continue to be available to the household. Information about these anomalies may be captured through the evaluation.

**53. Will FNS reconsider the requirement to expunge summer EBT benefits at the end of the summer? It will be a cost burden to our State to make these programming changes.**

FNS suggests that SEBTC expungement could be handled in the same way as early expungement with disaster benefits. Applicants, in the design of their program, need to consider their “first in-first out” hierarchy structure so that SEBTC funds will be used before SNAP benefits to reduce the potential for SEBTC expungement.

**54. Does benefit expungement apply only to households not receiving SNAP benefits?**

No, benefits for all SEBTC participants will need to be expunged, regardless of whether or not the household receives SNAP benefits.

**55. Usually expunged benefits are applied to any outstanding claims against the household. Will that process be the same with the SEBTC projects?**

No. The SEBTC demonstration projects are funded with SEBTC funds, not SNAP funds. Therefore, any unused SEBTC benefits at the end of the summer will need to be expunged and returned to FNS, rather than applied to SNAP claims.