

August 27, 2024

J. Kevin Maskornick  
Division Director  
Community Meals Policy Division  
USDA Food and Nutrition Service  
1320 Braddock Place, Alexandria, VA

**RE: Interim Final Rule: Establishing the Summer EBT Program and Rural Non-Congregate Option in the Summer Meals Programs, RIN 0584-AE96**

Dear Director Maskornick:

The below organizations in Massachusetts steadfastly support accessible, equitable summer nutrition programs. As health care providers, emergency food providers, legal aid, and community organizations we support USDA's commitment to summer nutrition programs that are complementary and intended to be used simultaneously.

We appreciate our state Department of Transitional Assistance and Department of Elementary and Secondary Education for their work setting up Summer EBT and Summer Eats. This summer, Summer EBT brought nearly \$70 million in federal food funds to over 550,000 students across the Commonwealth. Summer EBT and Summer Eats provide significant help for families struggling to put food on the table in the summer months. And, Summer EBT is spent at thousands of retailers, providing important economic benefits to every city and town in Massachusetts.

We strongly support the interim final rule's commitment to streamlined eligibility and certification for Summer EBT. An effective and efficient Summer EBT program benefits Summer EBT state agencies and families alike. Using data the state has readily available is the best way to connect more eligible families to this critical food benefit. We also support final regulations that fully and clearly inform families about their eligibility for Summer EBT and provide a simple application process for families who are not automatically determined eligible.

Congress directed USDA to set up regulations that ensure timely and fair service to applications for and recipients of Summer EBT. In order to ensure timely and fair service, we urge USDA to address the following in its final regulation:

- Require Summer EBT agencies to use federal funds to replace stolen Summer EBT benefits, such as benefits that are skimmed.
- Redefine expungement so that the 4 month clock restarts when a household uses Summer EBT.
- Require Summer EBT agencies provide meaningful translations and interpreter services for Limited English Proficient (LEP) families that meet or exceed federal SNAP standards.

- Ensure all families who need a Summer EBT card can quickly get one, and that they can access a card in-person at a Summer EBT agency office in addition to the mail.
- Work with Summer EBT agencies to connect families with SNAP who are issued Summer EBT but not actively getting SNAP benefits.

In addition, we understand USDA is limited by statute to allowing non-congregate (grab & go) meal sites only in rural areas. While this is an important improvement to the Summer Food Service Program, it is inequitable to limit this option to only rural areas. We urge USDA to use its authority to allow states to use this option in non-rural areas, and subsequently evaluate the impact of non-congregate meal sites in non-rural areas.

Thank you for your consideration of these comments.

Sincerely,

**The undersigned Massachusetts organizations:**

*All Saints Episcopal Parish Brookline  
Arlington EATS  
Boston Area Gleaners  
Boston Missionary Baptist Community Center,  
Inc.  
Building Audacity  
Casa Myrna  
Center on Food Equity  
Charlton CHIP IN Food Pantry  
Citizens for Citizens Inc  
Community Harvest Project  
Community Servings  
Daniel's Table  
Dick's Market Garden, Inc.  
End Hunger New England  
Fall River WIC  
First Congregational Church of Revere Food  
Pantry  
Food For Free  
Fresh Truck  
Ginny's Helping Hand, Inc.  
Grow Food Northampton  
Inclusive Eats  
Jewish Family & Children's Service of Greater  
Boston*

*Just Roots  
Lane Gardens - Oakdale Farms  
Mass General Brigham  
Massachusetts Farm to School  
Metropolitan Area Planning Council (MAPC)  
Metrowest Legal Services  
Neighbors Helping Neighbors, Inc.  
Northeast Justice Center  
Project Bread-The Walk for Hunger  
Quincy WIC Program  
Reflection Films  
Rescuing Leftover Cuisine, Inc.  
St. Anthony's Food Pantry  
Temple Sinai of Sharon  
The Greater Boston Food Bank  
The Massachusetts Law Reform Institute  
The Neighborhood Developers  
The Open Door  
Wales Community Pantry  
WIC New Bedford MA  
Yes We Care, Inc.  
YMCA of Greater Boston  
YWCA Cambridge*