



# ARIZONA DEPARTMENT OF EDUCATION

HNS # 02-2025

*Original Signed*

## MEMORANDUM

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**To:** School Administrators and School Food Authorities of the National School Lunch and School Breakfast Program

**From:** Melissa Conner, Senior Deputy Associate Superintendent  
Arizona Department of Education, Health and Nutrition Services Division

**Date:** February 24, 2025

**Subject:** 2025 Summer EBT SUN Bucks School Food Authority Requirements and Information

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This memorandum provides important information for School Food Authorities (SFA) regarding the 2025 Summer EBT SUN Bucks program, eligibility requirements, and SFA's role in reporting student enrollment and free and reduced-price eligibility information to the Arizona Department of Education (ADE). This memorandum also reminds SFAs of the available SUN Bucks training and resources available to assist with reporting accurate student data and communicating with student households regarding the 2025 SUN Bucks program.

The federal Consolidated Appropriations Act, 2023 (P.L. 117-328) authorized a new permanent, nationwide Summer Electronic Benefit Transfer (S-EBT) Program. United States Department of Agriculture (USDA) has named and branded the S-EBT program "SUN Bucks". The SUN Bucks program provides a \$120 benefit per eligible child to purchase groceries during the summer when school is not in session. Families can benefit from SUN Bucks alongside other programs like Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Women Infants and Children (WIC), and the Summer Food Service Program (SFSP)/Seamless Summer Option (SSO). The Arizona Department of Education (ADE), Health and Nutrition Services (HNS), in partnership with the Arizona Department of Economic Security (ADES) will administer the 2025 SUN Bucks Program.

### **Who is Eligible for 2025 SUN Bucks?**

A child enrolled for at least one instructional school day at a National School Lunch Program (NSLP) or School Breakfast Program (SBP) participating site\* **during School Year 2024-2025** and meeting one of the following eligibility criteria for at least one day beginning on July 1, 2024, through the last day of the covered summer operational period (August 5, 2025) is eligible for 2025 SUN Bucks.

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- Children who reside in households that participate in SNAP, TANF, Food Distribution Program on Indian Reservation (FDPIR), and Medicaid (for Medicaid, household must be income eligible at 185% or below the federal poverty level)
- Foster Children, children certified for the Migrant Education Program or Homeless Education Program, and children participating in a Federal Head Start Program
- Children certified eligible for free or reduced-price meals based on a NSLP household application

\*While certain children attending schools that do not operate NSLP/SBP can be eligible, the information in this memorandum will focus on eligibility requirements and SFA reporting for students attending schools operating NSLP/SBP.

## **What To Expect From ADE**

### ***Automatic issuance of 2025 SUN Bucks benefits to students determined eligible through already available data sources***

ADE will automatically provide 2025 SUN Bucks benefits to eligible children by leveraging available data on file. Children identified by the state agency as qualifying for SUN Bucks benefits will receive benefits automatically, without requiring any action from the household, and the household will not need to submit a SUN Bucks application.

### ***Retrieval of available Public and Charter School Data***

Enrollment records and student eligibility information are reported to ADE via the Arizona Education Data Standards (AzEDS) through the Local Educational Agency's (LEA) Student Information System (SIS). Starting in the 2024-2025 school year, LEAs that administer the NSLP/SBP, as well as the legal owners of NSLP/SBP participating sites where another entity administers the NSLP/SBP through an inter-agency agreement, must report the NSLP/SBP eligibility status and source of free or reduced-price eligibility for all enrolled students in the new program association called "Student School Food Service Program Association". Children certified as free or reduced-price eligible and reported by the LEA will be issued SUN Bucks automatically without the need for the household to apply with a SUN Bucks application. Those sites that operate a Special Provision Option (SPO) such as the Community Eligibility Program (CEP), or Provision 2 or 3, and that do not collect school meal applications must report only direct certification match results for students as obtained from the CNP Direct Certification system. SFAs must work with their LEA SIS regularly to ensure accurate enrollment and free and reduced-price eligibility data is submitted on behalf of students and on an as-needed basis through June 30, 2025.

For 2025 SUN Bucks, AzEDS Income Indicators 1 and 2 from the Alternative Form for Income-based Eligibility can no longer be used to gather eligibility data for Summer-EBT. Income Indicators 1 and 2 are still used for other programs, but they cannot be used to identify eligibility for SUN Bucks benefits.

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## **2025 SUN Bucks Household Application**

ADE will offer a 2025 SUN Bucks household application for custodial parents and guardians to apply for the benefit. The online application is currently under development and is expected to be available in March 2025. ADE will notify SFAs once available and post a link to the website.

ADE requests SFAs to notify all households with students not already determined eligible for free or reduced-price meals about the 2025 SUN Bucks application, provide eligibility information, and how to apply.

NSLP/SBP households may visit the ADE Health and Nutrition Services website to submit the online application or access a paper version for submission to ADE. ADE will manage and process 2025 SUN Bucks household applications from parents and guardians. Only children who attended a minimum of one instructional school day during school year 2024-2025 and were **not** previously certified as eligible for free or reduced-price meals AND/OR who were enrolled in an NSLP/SBP participating school that did not distribute NSLP household applications and therefore could not be determined eligible through the household meal application should be notified of the ability to apply.

### **What actions are required by the SFA?**

SFAs' primary responsibility for the SUN Bucks Program is ensuring accurate student-level enrollment data, custodial parent/guardian name, mailing and home address, and free and reduced-price eligibility is provided to ADE via the CNP Summer EBT - SUN Bucks application portal in ADEConnect. Data sources, including AzEDS, the new Student School Food Service Program Association, and the ADE CNP Direct Certification System will prepopulate the CNP Summer EBT- SUN Bucks application portal. In the CNP Summer EBT - SUN Bucks application portal, SFAs must ensure 1) the prepopulated data is accurate and 2) reporting of student data for those that are not reported in AzEDS (non-AzEDS students). Non-AzEDS students include children enrolled in Bureau of Indian Education schools, private schools, pre-K students, and students attending a federally funded Head Start that participates in the NSLP/SBP. The Quick Guide: How to Report Students for Summer-EBT in the CNP Summer-EBT - SUN Bucks Portal linked under Additional Resources provides an overview of how SFAs can upload non-AzEDS enrolled students.

Additionally, SFAs are responsible for sharing information on 2025 SUN Bucks and promoting the SUN Bucks household application to families who are not automatically certified as eligible for the SUN Bucks benefit but who may otherwise qualify.

### **Training Information and Resources**

ADE will be hosting an informational webinar: ***What You Need to Know About Data & Access to SUN Bucks Benefits***, on Wednesday, February 26, 2025, from 1:30 am - 2:30 pm. SFAs may register for this webinar in the [ADE Professional Learning and Development \(APLD\)](#).

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This webinar will include an opportunity for Questions and Answers, which will be included in an updated version of this memorandum. Additional Resources offered include:

- [Quick Guide: How to Report Students for Summer-EBT in the CNP Summer-EBT - SUN Bucks Portal](#): This quick guide takes the user through navigating the SUN Bucks portal.
- [SUN Bucks Benefits: Actions Required by the SFA](#): This is a resource that outlines the actions required by the SFA for the SUN Bucks administration.
- [It's More than a Meal Application](#): This infographic is to be used as an advertising tool to assist SFAs in encouraging families to provide school meal applications.
- [SUN Bucks & AzEDS: Flow of Data](#): This resource will outline the importance of the continued connection and collaboration between the SIS representative and food service by illustrating the connection of AzEDs data to SUN Bucks benefits to families.
- No Meal Application, No Problem: This infographic is used to assist SPO (CEP and Provision 2 and 3) operators as well as those schools that don't collect school meal applications to alert families to submit a SUN Bucks household application. This resource will include a QR linked directly to the SUN Bucks household application and will be released when the application is available.

## ATTACHMENT A

### Questions and Answers

1. Q: Will all children enrolled in a CEP or Provision 2/3 site be automatically enrolled in SUN Bucks?  
A: No. To be eligible for SUN Bucks benefits, children must be individually determined to be eligible for free or reduced-price school meal benefits during the instructional year immediately preceding the summer operational period or during the summer operational period. Children enrolled in CEP or Provision 2/3 schools who are not otherwise identified as SUN Bucks eligible through streamlined certification may apply for SUN Bucks benefits using the SUN Bucks household application. This differs from Pandemic EBT where all children in CEP and Provision 2/3 schools were eligible for benefits.
2. Q: Does HNS need to confirm that children on SUN Bucks household applications were enrolled in an NSLP/SBP school during the 2024-2025 school year?  
A: Yes. HNS must confirm enrollment in an NSLP/SBP school for all children the parent/guardian is applying for using the SUN Bucks household application. This is why it is important to verify all children who were enrolled for at least one instructional school day are populated in the AzEDS and/or the CNP Summer EBT- SUN Bucks application portal. If a child is listed on the SUN Bucks household application and HNS cannot verify NSLP/SBP enrollment, the child will not be issued benefits even if they meet income requirements.

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3. Q: What is the Alternative Form for Income-based Eligibility, and can it be used to establish eligibility for Summer EBT?

A: The Alternative Form for Income-based Eligibility can be used to determine household income for programs or reasons other than USDA programs. These forms are used by some LEAs to collect information at their CEP or Provision 2/3 schools that would have otherwise been collected through NSLP/SBP applications on an annual basis. The Alternative Form or Income-based Eligibility does not meet the minimum SUN Bucks requirements and, therefore, cannot be used to establish eligibility for SUN Bucks. In 2024 only, HNS was approved for a waiver to allow this form to be used as an eligibility source.

4. Q: If a State Child Nutrition Agency uses Medicaid data to directly certify children for free or reduced-price school meals, can Medicaid also be used to establish Summer EBT/SUN Bucks eligibility?

A: Yes. If a Summer EBT Agency is participating in the Medicaid demonstration project to directly certify eligible children through Medicaid for free or reduced-price school meals, they can also use Medicaid to automatically enroll children who meet the income requirements for Summer EBT through the streamlined certification process. The household must be income eligible at 185% or below the federal poverty level and provide a household size with AHCCCS to be certified for free or reduced-price school meals and to be eligible for SUN Bucks.

5. Q: How can an SFA confirm a student is eligible for SUN Bucks?

A: The SFA can view the new FSP10 (Food Service Program Verification report), which displays students who have been reported to AzEDS with either Free, Reduced-Price or Full Pay eligibility status based on either a USDA Income Application, Direct Certification or Other Source Categorically Eligible source. Students who are reported as Free or Reduced-Price are eligible for SUN Bucks. The SFA can also log into the CNP Summer EBT- SUN Bucks application portal. In this portal, a student will either reflect an eligibility status as “eligible” or “not eligible” for SUN Bucks.

6. Q: If a student is an extended household member of a child matched as SNAP/TANF/or DC Medicaid Free or Reduced, are they eligible for SUN Bucks?

A: Yes. A student directly certified for SNAP, TANF, and/or DC-Medicaid will qualify him/herself and will also qualify all enrolled household members for free or reduced-price meal benefits and SUN Bucks benefits. Students who are extended benefits of these programs must be reported accurately in the new Student School Food Service Program Association in AzEDS.

7. Q: How can SFAs ensure accuracy of data in the CNP Summer EBT-SUN Bucks application portal?

A: To ensure accurate prepopulated data, SFAs should work closely with their SIS contact to ensure student data from the point-of-sale system matches the data maintained by the SIS.

Additionally, SFAs should log into the CNP Summer EBT - SUN Bucks application portal and

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review prepopulated data. SFAs can view and verify data for students reported as enrolled at NSLP/SBP sites for at least one instructional day; the portal displays information on whether the child is certified for free or reduced-price meals (and SUN Bucks eligible), the custodial parent/guardian's name, and mailing/home address information. SFAs must also report any students who were not reported in AzEDS in the CNP Summer EBT – SUN Bucks application portal.

8. Q: Are children who are enrolled in a Federal Head Start program eligible for Summer EBT/SUN Bucks?

A: If a child is enrolled in a Head Start program that participates in NSLP/SBP, the child is eligible for Summer EBT. If an SFA has Head Start students who have access to NSLP/SBP meals, the SFA must ensure these students have the “Enrolled in a federally funded Head Start Program” certification box checked off in the CNP Summer EBT - SUN Bucks application portal.

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