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# LEGAL BACKGROUND BRIEFING

Legal Services Division

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## HEALTHY KIDS IOWA PILOT PROGRAM

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# Healthy Kids Iowa Pilot Program

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## Overview

This briefing provides background information relating to the Healthy Kids Iowa Pilot Program (Healthy Kids Iowa), a state-implemented summer nutrition initiative that offered in-kind food benefits to low-income children as an alternative to the federally operated Summer Electronic Benefit Transfer (Summer EBT) program, also known as SUN Bucks. In June, July, and August 2025, the Healthy Kids Iowa program provided food boxes to eligible families through local food pantries. Healthy Kids Iowa is authorized through a demonstration waiver granted by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) under the Emergency Food Assistance Program (TEFAP) framework.

## Background

Iowa elected not to participate in Summer EBT and instead applied for a USDA waiver under the demonstration project authority provided by the Food and Nutrition Act of 2008, Section 17(b)<sup>1</sup>, to operate Healthy Kids Iowa, a TEFAP-based in-kind food distribution program.<sup>2</sup> The USDA approved the waiver as an alternative to Summer EBT on May 7, 2025.<sup>3</sup>

Healthy Kids Iowa provided eligible families access to a monthly food box valued at approximately \$40 per child per month for three summer months.<sup>4</sup> Each food box included USDA-approved items intended to maintain nutritional standards such as fruits, vegetables, dairy products, grains, and proteins.<sup>5</sup> Healthy Kids Iowa targeted children aged 4 to 18 in households at or below 185 percent of the Federal Poverty Level (FPL).<sup>6</sup>

Healthy Kids Iowa was authorized under federal emergency food assistance, 7 U.S.C. §§7501 – 7516, and implemented through the federal emergency food assistance program, 7 C.F.R. Part 251, which authorizes the distribution of USDA-purchased foods to low-income individuals through state agencies and nonprofit organizations. TEFAP permits states to deliver food assistance through food banks and pantries rather than electronic benefit transfers.

The USDA FNS's Midwest Regional Office oversees Healthy Kids Iowa. Iowa must submit regular reports concerning participation and distribution to ensure compliance with federal program requirements.<sup>7</sup>

## Program Administration and Eligibility

The Iowa Department of Health and Human Services (HHS) administered the program in partnership with Feeding America Food Banks such as the Food Bank of Iowa, Hawkeye Area community Action Program, and Food Bank of Siouxland.<sup>8</sup> These organizations operated under USDA guidelines to receive, store, and distribute food to eligible families.<sup>9</sup>

To participate in Healthy Kids Iowa, a family had to complete a TEFAP eligibility form<sup>10</sup> that included questions regarding the number of people in the household, whether the household meets the income eligibility, and whether the household participates in Supplemental Nutrition Assistance Program (SNAP) or free or reduced lunches under the National School Lunch Program. Income eligibility is set at or below

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1. 7 U.S.C. §2026.
  2. U.S. Department of Agriculture Food and Nutrition Service, Child Nutrition Program Waiver Request Guidance and Protocol - Revised, May 18, 2018, *available at* [www.fns.usda.gov/cn/waiver-request-guidance-and-protocol-revised](http://www.fns.usda.gov/cn/waiver-request-guidance-and-protocol-revised).
  3. Iowa Governor, Gov. Reynolds, Iowa HHS announces 'Healthy Kids Iowa' summer program to feed more school children, May 7, 2025, *available at* [governor.iowa.gov/press-release/2025-05-07/gov-reynolds-iowa-hhs-announce-healthy-kids-iowa-summer-program-feed-more-school-children](http://governor.iowa.gov/press-release/2025-05-07/gov-reynolds-iowa-hhs-announce-healthy-kids-iowa-summer-program-feed-more-school-children).
  4. Iowa Department of Health and Human Services, Healthy Kids Iowa, *available at* [hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa](http://hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa).
  5. USDA Food and Nutrition Service, USDA Foods Available in Fiscal Year 2026, *available at* [www.fns.usda.gov/tefap/foods-available](http://www.fns.usda.gov/tefap/foods-available).
  6. Iowa Department of Health and Human Services, Healthy Kids Iowa, *available at* [hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa](http://hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa).
  7. 7 C.F.R. §251.10.
  8. Iowa Department of Health and Human Services, Healthy Kids Iowa, *available at* [hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa](http://hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa).
  9. 7 C.F.R. §251.3(d).
  10. Iowa Department of Health and Human Services, The Emergency Food Assistance Program (TEFAP) Eligibility Application, May 2025, *available at* [hhs.iowa.gov/media/5929/download?inline](http://hhs.iowa.gov/media/5929/download?inline).
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## Healthy Kids Iowa Pilot Program

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185 percent of the FPL based on annual USDA guidelines that vary by household size. A household's FPL is determined by utilizing the number of people in the household and the household's annual income. For example, a household of four must earn under approximately \$59,478 per year to qualify.<sup>11</sup> The TEFAP eligibility form was completed by families on site at a distribution site to facilitate ease of access.<sup>12</sup>

### Comparison with Summer EBT

Unlike Summer EBT, which issues monetary benefits to eligible families on EBT cards to allow the family to make food purchases at authorized retailers,<sup>13</sup> Healthy Kids Iowa distributed food boxes in person. While a family's choices were different, the USDA granted Iowa a waiver to implement this model provided Healthy Kids Iowa maintained nutritional equivalency and equitable access.<sup>14</sup>

Summer EBT programs are federally funded and administered through SNAP infrastructure using school and Medicaid data for eligibility determination.<sup>15</sup> Iowa's Healthy Kids Iowa program operates outside of SNAP, using TEFAP's in-kind food delivery system to serve the same population.

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11. Id.
  12. Iowa Department of Health and Human Services, Healthy Kids Iowa, *available at* [hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa](https://hhs.iowa.gov/assistance-programs/food-assistance/healthy-kids-iowa).
  13. U.S. Department of Agriculture Food and Nutrition Service, SUN Bucks (Summer EBT), June 5, 2025, *available at* [www.fns.usda.gov/sebt/summer-ebt](https://www.fns.usda.gov/sebt/summer-ebt).
  14. U.S. Department of Agriculture Food and Nutrition Service, The Emergency Food Assistance Program, August 8, 2025, from [www.fns.usda.gov/tefap](https://www.fns.usda.gov/tefap); U.S. Department of Agriculture Food and Nutrition Service, Child Nutrition Program Waiver Request Guidance and Protocol - Revised, May 18, 2018, *available at* [www.fns.usda.gov/cn/waiver-request-guidance-and-protocol-revised](https://www.fns.usda.gov/cn/waiver-request-guidance-and-protocol-revised).
  15. U.S. Department of Agriculture Food and Nutrition Service, SUN Bucks (Summer EBT), June 5, 2025, *available at* [www.fns.usda.gov/sebt/summer-ebt](https://www.fns.usda.gov/sebt/summer-ebt).
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