



Testimony in opposition to LD 287, An Act To Require Electronic Benefits Transfer Cards and Other General Assistance Cards To Be Printed with the Beneficiary's Photograph

To Senator Claxton, Representative Meyer, and members of the Joint Standing Committee on Health and Human Services.

My name is Amy Gallant and I am the Vice President of Public Policy and Research for Good Shepherd Food Bank of Maine. We have a network of more than 500 partner agencies, supporting our mission to eliminate hunger in Maine by improving access to nutritious food for people in need, building strong community partnerships, and mobilizing the public in the fight to end hunger. Last year, through our network, we distributed 27 million meals across the entire state.

SNAP is the most important food security program in the nation. One in 9 Mainers are enrolled in SNAP, totaling 157,000 people. This program allows the dignity of going to the grocery store or farmers market and selecting the food one's family needs and wants instead of relying on the emergency food network.

We all agree on the importance of SNAP integrity. We do not want to see mistakes or misuse. We also know that a photo on an EBT card does not improve program integrity. In fact, a number of states, Maine included, started putting photos on EBT cards and stopped because it is costly and ineffective to preventing fraud.

An EBT card is for all members of the household. This means that more than one person is allowed to use the card. An EBT card can be used by a designated representative, for example a family member or home health worker. This renders the photo useless for identification of the legal user(s) of the card.

At the point of transaction, EBT card users cannot be treated differently than any other customer. This means that unless stores check the photo ID of every customer using a debit or credit card, verifying the photo ID of only EBT card users is illegal and discriminatory.

Maine adopted a policy in 2014 in which SNAP recipients could voluntarily have their photo placed on their EBT card. The pilot program began in Penobscot and Piscataquis counties, followed by a statewide rollout. The program's startup cost in 2014 was estimated to be \$160,000 with an ongoing fiscal note of \$41,000. During the time of photos on EBT cards in Maine, the attorney general successfully prosecuted 14 cases of EBT-related fraud. Three of these cases involved an individual using a card they weren't authorized to use. The rest involved fraud in the application process so applicants appeared eligible for more benefits.

Maine's implementation of photos on EBT cards was confusing, costly, administratively burdensome, and in some cases illegally denied benefits and/or food purchases to eligible Mainers. DHHS Commissioner Lambrew and Secretary of State Dunlap agreed with the decision to end the policy, saying that there is no evidence that use of photo EBT cards decreases fraud.



That's the same conclusion several other states came to that have considered a photo requirement for their own EBT programs, including Tennessee, Missouri, and Pennsylvania. When Pennsylvania considered adding a photo to their EBT cards, they found the cost would increase from \$0.23 per card to \$8 per card.

Massachusetts had a particularly troubling rollout of photos on EBT cards. In 2013, the Massachusetts legislature passed a law requiring photos on EBT cards. The law passed with a fiscal note of \$2.5 million to replace 220,000 cards, exempting those under 18 or over 60, blind, disabled, homeless, a victim of domestic violence, or if a photo is prevented by religious beliefs. Massachusetts spent \$1.5 million to change over to photo cards and about \$200,000 a year in ongoing costs. Those SNAP recipients (approximately 170,000) who had a photo on file with the Massachusetts Registry of Motor Vehicles were issued new cards, and their old cards were deactivated. 7,500 cards were returned to the overseeing agency, and a additional cards were incorrectly deactivated. Due to these downfalls in the implementation of photos on SNAP cards, an estimated 8,000 to 12,000 Massachusetts SNAP recipients were without the food assistance for which they are eligible. Additionally, Massachusetts now has three variations of SNAP cards; one with a photo, one without a photo, and one that says valid without photo. This complicates the program for recipients, for cashiers and retailers at the point of transaction, and is an ongoing administrative burden for the state.

I urge you not to pass this bill into law. Let's not repeat the mistakes of the past and other states. Thank you for your time and consideration of my testimony.

Sincerely,

Amy Gallant
Good Shepherd Food Bank
Vice President of Public Policy & Research