

Janet T. Mills
Governor

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Commissioner



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March 23, 2021

Senator Ned Claxton, Chair
Representative Michele Meyer, Chair
Members, Joint Standing Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

Re: LD 287 – An Act To Require Electronic Benefits Transfer Cards To Be Printed With The Beneficiary's Photograph

Senator Claxton, Representative Meyer, and Members of the Joint Standing Committee on Health and Human Services:

This letter is to provide information regarding LD 287, An Act To Require Electronic Benefits Transfer Cards to Be Printed With The Beneficiary's Photograph. Each electronic benefit transfer (EBT) card would be replaced with one that includes the picture of the head of the respective Food Supplement (also known as SNAP) household.

The Department has a robust Fraud Investigation and Recovery Unit and Program Integrity Team and does not agree that this bill will improve program integrity or reduce SNAP benefits trafficking. A 2018 study conducted by the Congressional Research Service found that photos on EBT cards had little to no effect on trafficking of benefits¹.

It should be noted that it is allowable for another household member or trusted person to use an EBT card if they have the appropriate PIN number. Food Supplement recipients in the household may be illegally denied by a retailer if their picture is not the one on the card.

Based on the Department's previous experience with photo EBT cards, the costs incurred, and the requirements placed on states that implement photo EBT cards (found at 7 F.C.R. § 274.8), we strongly suggest LD 287 be opposed.

If this bill passes and all EBT cards were replaced with photo EBT cards, the replacement cost in the first year of implementation is estimated at \$186,000 for the card stock and mailing. Additional administrative cost would include training for statewide eligibility staff and an additional 16 full time Customer Representative Associate II's (one per regional office) is estimated to be over \$1 million annually. The Office of Information Technology (OIT) estimates the cost for technology and personnel in the first year to be \$87,000 with an annual data storage cost of \$23,000.

We wanted you to be aware of the above information as you consider this bill going forward.

Sincerely,

DocuSigned by:
A handwritten signature in blue ink, appearing to read "Anthony Pelotte".

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Anthony Pelotte, Director, Office for Family Independence

¹ <https://fas.org/sgp/crs/misc/R45147.pdf>