



SENATE GOVERNMENT AGENCY AND REVIEW COMMITTEE

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Chairman Schuring, Vice Chairman Rulli, Ranking Member O'Brien and members of the Senate General Government Agency and Review Committee, thank you for the opportunity to provide interested party testimony on Senate Bill 165. My name is Hope Lane and I am a Policy Associate at The Center for Community Solutions, a nonprofit, nonpartisan thinktank that aims to improve health, social and economic conditions through research, policy analysis and communication.

Senate Bill 165 is intended to curb abuse and fraud in Ohio's Supplemental Nutrition Assistance Program (SNAP) most notably found in the 2016 report conducted by then Auditor Dave Yost in which the Auditor of State's office identified many weaknesses in Ohio's SNAP program. While Community Solutions also believes in preserving the integrity of the program to ensure that resources are available to those most in need, we suggest other non-photo strategies for combatting fraud.

Some of the fraud discussed by former Auditor Yost and current Auditor Keith Faber involves collusion between the beneficiary and the retailer, for example. If the retailer is complicit in the fraud, a photo ID card will not deter the transaction. This could be monitored with better electronic surveillance of suspicious transaction patterns and higher penalties on retailers and beneficiaries who commit fraudulent activity.

The Legislative Service Commission (LSC) estimates that after exemptions, roughly 450,000 active Electronic Benefit Transfer (EBT) cards will need to include a photograph. While understanding that the federal government reimburses states at 50 percent of the cost of administering SNAP programs, the state will still be required to fund the Ohio Department of Jobs and Family Services (ODJFS) at unprecedented levels to account for one-time and ongoing annual costs to implement a SNAP program with photographs.

Only 10 states including Ohio have county-administered benefit programs where counties and local governments are responsible for a significant chunk of the administrative and supplemental costs of running the program. Since Massachusetts is the only state that currently has a SNAP photo ID program, and their program is state administered, it's difficult to estimate what expenses county departments of job and family services (CDJFSs) will be responsible for as opposed to the state.

While the bill allows for the Bureau of Motor Vehicles (BMV) to share photos with ODJFS for the purpose of printing them on EBT cards, it does not address:

- How often beneficiaries are required to update their SNAP ID photo



- How beneficiaries who do not interact with the BMV and under federal guidelines meet the criteria for an interview waiver due to a hardship situation (which can include child-care difficulties, transportation difficulties, illness, care of a household member, inclement weather or work hours that conflict with CDJFSs business hours) obtain a photo for an EBT card

Additionally, nutrition assistance is awarded by household, not by individual, thus everyone in a household is entitled by federal law to use the EBT card the assistance comes on. Federal law prohibits retailers who accept EBT from refusing to let all SNAP household members use the card, even if their name or photo is not on the card, and prohibits retailers from subjecting food stamp shoppers to special scrutiny. It's important to keep in mind, however, that the legislation does not include an appropriation for ODJFS to train merchants on the new guidelines for cards and how to avoid discriminatory practices.

The Urban Institute, a Washington D.C. based thinktank that carries out social and economic policy research, assessed the merits of photo EBT cards in the SNAP program and concluded that “the cost estimates of operating a photo EBT policy, weighed against the limited expectation of altering the behavior of would-be traffickers, suggest strongly that photo EBT cards are not a cost-effective approach to combat trafficking.”ⁱ

The SNAP program has long been the first line of defense for food-related hardships and poverty in general. It's important that the rights of those who are eligible for the program are not impeded when trying to use benefits due to additional scrutiny at retailers. It is also critical that lawmakers consider the SNAP program as a whole when weighing decisions that could impact access to nutrition, as households across every district in Ohio rely on SNAP to provide nutrition to their families.ⁱⁱ

I want to thank you again for the opportunity to provide interested-party testimony as Community Solutions always values the chance to weigh in on policies that would greatly impact the health and wellbeing of Ohioans. We welcome the chance to share additional research that we have conducted in this space, and are happy to answer any questions that you may have at this time.

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ⁱ <https://www.urban.org/sites/default/files/publication/44641/2000159-Assessing-the-Merits-of-Photo-EBT-Cards-in-the-Supplemental-Nutritional-Assistance-Program.pdf>

ⁱⁱ <https://www.communitysolutions.com/resources/community-fact-sheets/ohio-legislative-districts/>