



Ohio Job and Family Services Directors' Association

37 West Broad Street, Suite 1120 ♦ Columbus, Ohio 43215

Joel Potts, Executive Director

**Senate Health, Human Services and Medicaid Committee
Interested Party Testimony on House Bill 50
April 10, 2018**

Chairman Burke, Vice-Chair Beagle, Ranking Member Tavares, and Members of the Senate Health, Human Services and Medicaid Committee:

Thank you for the opportunity to provide interested party testimony on House Bill 50, which proposes a photo be required on many electronic benefit transfer (EBT) cards. EBT cards are the mechanism through which individuals receive food assistance, or Supplemental Nutrition Assistance Program (SNAP) benefits.

It is the county job and family service agencies' primary duty to ensure clients receive the services they need and are entitled to, as well as ensure program integrity. The counties constantly strive to provide a viable, safe, effective, efficient system while maintaining program integrity and operate as good shepherds of the public trust.

Despite no dedicated funding source for county agencies, Ohio is one of the leading states in the country in identifying fraud and collections. Fraud and abuse investigations can be extremely complex, involving local law enforcement, as well as require prosecutor and court actions. Successful implementation of this legislation as an anti-fraud tool would be dependent on adequate resources including equipment, training, information technology support and clear guidelines for clients, retail establishments and government workers.

As the representatives of the county departments of job and family services, who are responsible for collecting required information and verifying eligibility in a timely manner for Ohio's public assistance recipients, we have several questions around the program design and implementation for the proposed requirement.

Bill sponsors contend having a photo of a member of the household on the card will act as a deterrent for an individual using their SNAP benefits in a fraudulent or inappropriate manner. My questions and comments are intended to highlight programmatic considerations that need to be taken into consideration to ensure the legislation meets the legislative intent and also that the legislature understands the programmatic issues which need to be addressed for success of this measure.

HB 50 would require a color photograph of at least one adult member of the household for which the card is issued be placed on the front of the card. The bill also requires that on the back of the card, a telephone number that can be called to report suspected fraud under the SNAP program and the address of a web site where suspected fraud can be reported be placed.

The bill exempts the photo requirement for households that do not include any adult members, or in which each of the adult members of the household is sixty or older, blind, disabled, a victim of domestic violence, or has religious objections to being photographed. It also provides that an adult who meets one of these exemptions may volunteer to have a photo included on his or her EBT card.

The bill was amended in the House process to provide authority for the BMV to disclose an individual's photograph or digital image to ODJFS. This amendment was put forth in response to questions counties raised in meetings with the bill sponsors around implementation and program design.

Conceptually, the intent of the bill is clear. And the BMV amendment is a conceptual response to how such a requirement may be operationalized. However, several questions remain from a program design and requirement perspective. To make the idea of adding photos to the EBT card a functioning program in Ohio, several important questions need answered and decisions need to be made.

Information technology systems and specification-related questions include:

- Have the Departments of Administrative Services and Public Safety discussed the compatibility of the BMV system with Ohio Benefits, and has a cost been identified to link these two systems?
- Have there been conversations around the timing of potential implementation, given the statewide conversion of SNAP and TANF eligibility to Ohio Benefits scheduled to occur this summer? The conversion will be the pinnacle of a five-year project to replace the current eligibility system, CRIS-E, which has been in place for over thirty years.
- Will individuals be required to have a government-taken photograph included on the front of the card, or will other photographs suffice?
 - o If yes, and the individual does not have a BMV photo, will there be standard photo or camera specifications, or mandates around which type of entity is authorized to take the photo?

Policy-related questions include:

- Will there be a standard process for deciding which adult member of a household must have his or her picture on the EBT card?
- Are any associated changes planned around the ability of an adult to authorize an individual outside of the household to use their card for the purchase of food? Today, such authorization is granted via knowledge of the EBT card PIN number.
- Which telephone number will be on the back of the card to report suspected fraud, and what are policymakers' expectations for how such calls will be handled?
- Have there been estimates done on the amount of time the photo requirement and acquisition will add to the determination of eligibility for SNAP benefits? States are held to strict federal standards on timely benefit determination, and entities not in compliance can incur federal financial penalties if not in compliance.
- Are there estimates around the number of SNAP recipients who may need to physically come into the JFS for their photo, if that is the entity designated to take the photo? Studies have shown interview time for individuals who physically are in the agency take 45-60 minutes, compared to 15-20 minutes for individuals who are interviewed over the phone.
- Ohio has made significant investments in modernizing the JFS delivery system so that individuals do not have to come into the office for business that can be conducted online or on the phone. Are policymakers contemplating a different strategic vision?

We appreciate the accessibility of bill sponsors and proponents to work with us on the issues we have raised. We respectfully ask that should the legislature consider enacting this legislation that stakeholder meetings occur with representation from all state and local agencies involved in implementation to ensure a smooth rollout both for the system and the households we serve.

Program integrity is a constant concern and top priority for county job and family agencies in our duty to administer the public assistance programs of the state. County agencies welcome the opportunity to work with the sponsors and committee to develop legislation that further ensures confidence in the system.

Thank you again for allowing me to testify as an interested party on HB 50. I would be happy to answer any questions and look forward to the opportunity to work with the sponsors and committee to develop legislation that meets the needs of the food assistance program.