



JESSE KREMER

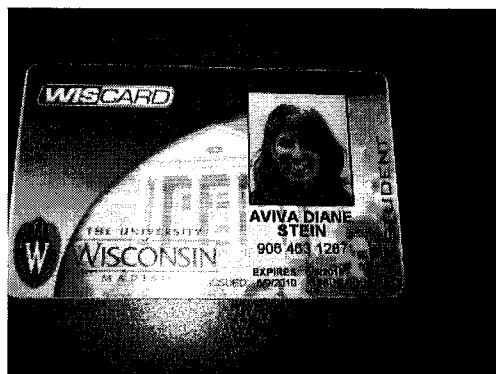
STATE REPRESENTATIVE • 59TH ASSEMBLY DISTRICT

*Testimony before the Senate Committee on Public Benefits, Licensing and State-Federal Relations
State Representative Jesse Kremer
January 11, 2018*

Good morning Chairman Kapenga and committee members. SB 624 is a bill that aims to significantly reduce recipient FoodShare fraud in Wisconsin. This bill is not intended to harm those who are truly in need, but to end fraudulent behavior to ensure that aid remains available to the neediest in our communities.

To better understand the impetus for this bill, it's important to visualize how the program is designed. The Wisconsin arm of SNAP, the federal Supplemental Nutrition Assistance Program, is called FoodShare. SNAP is administered by the Food and Nutrition Service (FNS), a division of the U.S. Department of Agriculture (USDA). In 1996, federal law mandated that states switch to electronic benefit cards, also known as EBT cards, to administer benefits instead of paper copy food stamp coupons. FoodShare EBT cards are called QUEST cards in Wisconsin, with new benefits added each month. Wisconsin QUEST cards currently include one layer of security through the use of a personal identification number (PIN). This bill would require an additional level of security for QUEST cards.

Some banks and our own UW system incorporate photo IDs on debit cards for an additional layer of security. The UW WisCard is no longer simply a college ID, but also a debit card with a photo ID. Bank of America states directly in its website that, although their cards currently have PIN numbers and computer chips, "your picture on your debit card helps protect you from fraudulent use if your card is lost or stolen."





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FoodShare program costs are shared approximately 50/50 by the state and federal governments. In 2016, Wisconsin taxpayers paid \$68.6 million to administer \$923 million in benefits to 728,000 individuals (360,000 households), 12.6 percent of the state population.

When analyzing our public benefit programs, it is important to note that there are two types of fraud: recipient fraud and provider fraud. This bill would address recipient fraud in Wisconsin, approximately \$11.1 million annually.

Other states are currently utilizing a photo ID EBT card system. Maine recently implemented a program in July 2014, and Massachusetts re-implemented their program under Democrat Governor Deval Patrick in 2013 after it was shut down by Governor Romney in 2004.

Since Senator Nass and I introduced this bill in 2015, Wisconsin recipient fraud has increased from just over 1% to 1.2%, effectually robbing taxpayers of 11.1 million dollars in 2016 alone and 22.1 million dollars since I last introduced this bill.

	Wisconsin	Maine	Massachusetts
Number of SNAP Households in 2016	360,000	99,000	450,000
Number of Individuals Covered in 2016	728,000	189,000	779,000
SNAP Dollars in 2016	\$923 million	\$255 million	\$1.2 billion
Recipient Fraud in 2016	\$11.1 million (1.2%)	\$342,000 (0.1%)	\$4.46 million (0.4%)
Estimated Photo Program Startup Costs	\$7 million*	\$166,000	\$5-7 million
Estimated Annual Costs	\$2 million*	\$41,000	\$4.4 million
Population in 2016	5.78 million	1.33 million	6.812 million

**state GPR portion would be 50% of this figure*

Although federal regulations regarding EBT cards currently allow for photos, there are some situations that must be addressed in the DHS waiver if this bill is signed into law. For example, those who could be adversely affected by a photo mandate such as the blind, disabled, victims of domestic violence and those under age 19 or over age 60 would not be required to have a photo on their card. Cards for these individuals would likely state "valid without photo".



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If passed by the legislature and approved by FNS and USDA, this bill would then require final approval prior to implementation from the Joint Finance Committee. I believe that by implementing photos on QUEST cards, we will be adding one more layer of security and deterring fraud.

In closing, I would like to thank Governor Walker, Secretary Seemeyer and the office of the Inspector General for the steps they have taken in recent years to curb much of the fraud and abuse occurring on Facebook, Craigslist and eBay. While it is clear that the majority of FoodShare users are not abusing the system, we need to continue to have open minds towards evolving our FoodShare program and strive to shift public benefit program control from the federal government to the states with thoughtful consideration given to fraud and abuses wherever they may occur so that we remain trustworthy stewards of taxpayer dollars.

Thank you again for the opportunity to testify today and I encourage you to support Senate Bill 624.



Stephen L. Nass
Wisconsin State Senator

SB 624 Photo Identification on FoodShare Cards

Testimony of Senator Steve Nass

Senate Committee on Public Benefits, Licensing, and State-Federal Relations
January 11, 2018 • 400 Southeast, State Capitol

Thank you Chairman Kapenga for holding a public hearing on Senate Bill 624. This legislation will help deter fraudulent use of FoodShare benefits in Wisconsin by requiring photo identification to appear on FoodShare EBT cards, or the QUEST card as it is called in Wisconsin.

The QUEST card currently contains only the name of the head of household to which the card is issued and requires a unique PIN to access benefits on the card. The only built-in safeguard against fraudulent use of the card is knowing the card's PIN. If an individual wants to fraudulently sell a QUEST card, all they have to do is give that person the PIN to use it. This bill adds an additional level of fraud deterrence by adding the head of household's photo to the card.

This bill requires DHS to prepare and submit a comprehensive implementation plan and waiver request to the U.S. Department of Agriculture (USDA) allowing Wisconsin to issue EBT cards containing a photo to recipients of the FoodShare program. The final plan must also be approved by the Joint Finance Committee before being implemented. This will ensure implementation can be completed in a cost effective manner.

The FoodShare program is a beneficial program that assists lower-income residents in need with the purchase of food. However, there is also a significant amount of abuse in this program that needs to be addressed. SB 624 will continue to ensure we help those truly in need in our communities, while at the same time reduce the abuse and fraud in this program.

According to Wisconsin Department of Health Services (DHS) data, fraudulent FoodShare overpayments have been on the rise since the Department began tracking them in 2012. DHS reports more than \$32.67 million in fraudulent FoodShare overpayments since 2012, including: \$3.6 million in 2012, \$5.56 million in 2013, \$6.55 million in 2014, \$6.87 million in 2015, and \$10.09 million in 2016. These statistics

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11th Senate District

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reflect overpayments that were identified under the DHS Fraud Prevention and Investigation Program, both before and after the funds were provided to recipients.

Thank you for the opportunity to testify in support of this legislation that will reduce fraud in the FoodShare program. If committee members have further questions, I am happy to answer them at this time.

Testimony of Hunger Task Force

Before the Senate Committee on Public Benefits, Licensing and State-Federal Relations

January 11, 2018

IN OPPOSITION TO SB624: AN ACT to create 49.79 (7g) of the statutes; relating to: photo identification

SUMMARY: SB624 is expensive, inefficient and would bring about complex legal, operational and civil rights issues that could adversely affect access for FoodShare participants. SB624 would create a program that would either be a burden on grocers, or violate federal law. The program would bring back slow, outdated practices and would fail to reduce fraud beyond current safeguards. In the end, this program would increase hunger in Wisconsin for our most vulnerable citizens.

Hunger Task Force is a Milwaukee-based food bank and anti-hunger advocacy organization. Our mission is to end hunger today and prevent hunger tomorrow. We seek to feed the hungry with respect and dignity.

SB624 has the potential to damage one of the most important and successful tools we have for fighting hunger, FoodShare.

Some background on FoodShare:

FoodShare is Wisconsin's name for the federal government's Supplemental Nutrition Assistance Program, formerly known as, "Food Stamps." 100% of the recipient benefit is federal tax dollars returned to Wisconsin's economy. Administrative costs are split 50/50 between the Federal Government and the State of Wisconsin.

- 43% of FoodShare participants are minors, and over half of that group are under the age of 9.
- 25% are elderly, blind or disabled.
- Of the adults that receive FoodShare, 40% have a job.
- FoodShare is designed to grow as need increases during periods of high unemployment. The number of recipients in the program has historically followed poverty and unemployment numbers.

One of the key attributes of FoodShare is that it gets people out of the food pantry and into the grocery store where they can shop like anybody else, with respect and dignity.



In speaking to SB624, we start with an assumption that this legislation is offered with the intent of addressing fraud. However, this dramatic modification to the FoodShare program is offered without reference to practicality, effectiveness or the nearly \$10M in implementation and continuity costs. This rule would require many participants to travel to get their photo ID taken in order to be issued an EBT card to access their benefits. The USDA recently updated regulations to establish procedures to ensure States attempting to implement photo EBT requirements adhere to federal law. Failure to follow federal rules may result in penalties, including a loss of federal funding.

Federal law regulates photo ID on the EBT card. States that have passed a law requiring photo ID for EBT cards have faced a costly, ineffective and often illegal implementation process such as Maine and Massachusetts. Vendors that violate the program regulations and policies may be subjected to monetary claims, civil penalties, suspensions, terminations or disqualification from the SNAP/FoodShare program (or a combination of these sanctions).

Under federal law, retailers cannot treat SNAP/FoodShare participants differently than other customers. If retailers were required to check the photo on Quest cards, they would also be required to check identification of all customers using a debit or credit card. The Maine Grocers Association and Merchants Association both testified in 2012 in opposition of EBT photo legislation in Maine. The Illinois Retail Merchants Association also announced strong opposition to a state photo ID for SNAP recipients in 2013.

Federal law states that a household may authorize any household member or nonmember to use the FoodShare EBT card and benefits to purchase food. A photo ID of one member of the family on the card must not prohibit any other authorized person from using the card. Any process that would deny benefits to a person who is authorized to use them would violate both the letter and spirit of the federal law. "Authorized representatives" are also allowed under federal law. A FoodShare household has the right to designate a trusted relative, friend or social agency to shop for them. This person cannot be prohibited from using benefits to purchase food, even if their photo is not on the card.

Because FoodShare/SNAP is 100% federally funded benefit, the card must be interoperable so FoodShare/SNAP participants can use their card in any state. So, SNAP clients from states without a photo ID must be able to use their EBT card in Wisconsin.

It wouldn't reduce fraud. Wisconsin would be required to inform retailers that, even though a photo ID is on each Quest card, no retailer may deny the use of the card if that photo does not match the cardholder. Anyone covered on the FoodShare case, and authorized representatives, are legally able to use the card, and must not be denied the purchase of food. Retailers are only allowed to check the photo on the card if they check the ID of all customers that come through the line with a card. But they would be prohibited from denying the use of the card, even if the photo does not match the cardholder. Additionally, households whose benefits were expedited are exempt from a mandatory photo EBT card until their next recertification. This makes the photo ID bill extremely ineffective.

It's expensive. Wisconsin has spent years streamlining and modernizing program application processes. Interviews conducted over the phone reduce staff time and the need for in-person visits. The modernization of the multi-program application has reduced administrative costs. Requiring photo ID will increase visits to welfare offices, increase equipment and staffing costs, and have significant implementation costs.



HUNGER TASK FORCE

FREE & LOCAL

A study in Arizona found that it would take 10 minutesⁱ to prepare one photo EBT card. In Wisconsin, this rule would result in 335,943ⁱⁱ new cards being processed, which would take over 55,990 hours of worker time. When Pennsylvania considered adding a photo to their EBT cards, they found the cost to produce a card would jump from \$0.23 to \$8 per card. They also found that this cost would further increase, as recipients may seek replacement cards. Maine faced federal penalties for their failure to implement photo EBT in accordance with federal law. Massachusetts faced similar concerns. Retailers in other states failed to properly follow regulations on photo EBT. It is impractical to enact a policy that has caused other states to face federal penalties, causing more tax payer money to be spent on a policy that does not accomplish what it sets out to do.

It would increase hunger. The additional stigma, bureaucracy, complication and confusion created by this program will ultimately impact Wisconsin's most vulnerable citizens, seniors and people with disabilities. Enrollment in FoodShare has historically been low for seniors who qualify. Complicating the EBT system will deter more seniors from signing up or continuing to participate in the program. These individuals then end up in the food pantry line, or (more likely) will skip meals to stretch what food they have left.

There are valid reasons that FoodShare recipients would not want their photo ID on an EBT card. Victims of domestic violence may have safety concerns, seniors or persons with disabilities may not have transportation or may have difficulty getting to the welfare office to obtain a photo. 25% of FoodShare participants are elderly, blind or disabled and just over 40% of FoodShare participants are children.

Wisconsin has effective procedures and safeguards to prevent FoodShare fraud at both the retailer and customer level. Since the implementation of EBT and the use of Personal Identification Numbers (PIN) to identify authorized users, Wisconsin DHS can track and identify potential program violations perpetrated by retailers and participants. Adding a photo ID will not help solve fraud any more than existing safeguards, but could jeopardize participants' ability to legally obtain food.

CONCLUSION:

While SB624 wouldn't be able to address the problem it sets out to fix, it would make things more difficult for Wisconsin's most vulnerable families and people that are truly hungry.

Hunger Task Force works to feed hungry people with respect and dignity. Hunger does not respect age, sex, race or background. Many that receive FoodShare never would have anticipated the circumstances that put them in the position of needing help. We do not believe that people struggling to feed themselves are second class citizens. FoodShare gets people out of the food pantry system and into the grocery store. SB624 will waste taxpayer dollars, increase bureaucracy, and will stigmatize those shopping for groceries with FoodShare.

We oppose passage of sb624.

ⁱ HB2675 Will Deny Access to Food Stamps, May Cause Discriminatory Treatment and Unnecessary Increases to DES' Administrative Costs. William E. Morris Institute to Justice.

ⁱⁱ October 2017 had 335,943 FoodShare cases.



WISCONSIN BOARD FOR PEOPLE
WITH DEVELOPMENTAL DISABILITIES

January 12, 2018

Senate Committee on Public Benefits, Licensing, and State-Federal Relations
Senator Kapenga, Chair
State Capitol, Room 15 South
Madison, WI 53707

Dear Senator Kapenga and members of the committee:

Thank you for the opportunity to provide comment on SB 624. The Wisconsin Board for People with Developmental Disabilities' (BPDD) analysis of this bill concludes that people with disabilities would be disproportionately harmed. We oppose SB 624.

Many people with disabilities in Medicaid programs are also FoodShare recipients¹. 25% of FoodShare recipients are elderly, blind, or disabled.

Adding a Photo ID requirement for recipients of FoodShare cards will result in confusion and perhaps denial of sales to people who are legally purchasing food on behalf of FoodShare recipients with disabilities.

Many people with disabilities do not have driver's licenses or photo ID photos on file with DOT, which will require people either to obtain a photo ID or need a photo taken for an EBT card in order to receive food benefits. The DHS fiscal estimates that 60% of current FoodShare recipients would need to have a photo added to their EBT card.

Lack of reliable transportation options is a real barrier for many people with disabilities; a recent BPDD survey found that 75% of people with disabilities said limited access to transportation impacted their ability to get to where they need to go in the community. Requiring a population that have few or no transportation options and limited funds to pay for transportation to physically get to a DMV or welfare office will discourage low-income people with disabilities from accessing assistance to purchase food.

Federal law requires that a FoodShare household has the right to designate a trusted relative, friend or social agency to food shop for them. All members of the household are legally able to use a FoodShare card, whether or not their ID is on the card, and non-household members authorized^[2] by the card holder to use the card may do so on their behalf. Many people with disabilities have staff, family members, neighbors, or others in their

¹ People with physical, intellectual/developmental, and mental health disabilities often are participants in Wisconsin's Elderly Blind and Disabled Medicaid health insurance (BadgerCare, SeniorCare) or long-term care (Family Care, Family Care Partnership, and IRIS) programs. Income at or below 100% of the Federal Poverty Level (\$11,770 annual income for an individual) and an asset limit of \$2000 is threshold for eligibility for Medicaid these programs; 100% FPL is also the income threshold to qualify for FoodShare.

^[2] Permission from the card holder is considered authorization.

support network that purchase food for them. A Photo ID picture of one individual does not reflect the entire household or a designee who can use the card.

This bill does not include any exemptions to the Photo ID requirement or provisions to include additional photos or other verification that the person using the FoodShare card has been authorized by the recipient to do so.

In addition to the tremendous administrative costs to the state to implement a Photo ID (estimated one-time costs at \$7.6 M and ongoing costs at \$1.6 M), BPDD cautions that any changes to requirements and administrative process will cause participant confusion, especially among populations who may be non-readers, non-verbal, use adaptive or responsive technology (including touchpads), have large print needs, may not have access to the internet, etc. Participant confusion will lead to loss of access to food. BPDD suggests that DHS's fiscal estimate on outreach to FoodShare clients will be insufficient to meet the communication needs for the Intellectual/Developmental Disability population.

BPDD is charged under the federal Developmental Disabilities Assistance and Bill of Rights Act with advocacy, capacity building, and systems change to improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with developmental disabilities.

Our role is to seek continuous improvement across all systems—education, transportation, health care, employment, etc.—that touch the lives of people with disabilities. Our work requires us to have a long-term vision of public policy that not only sees current systems as they are, but how these systems could be made better for current and future generations of people with disabilities.

Thank you for your consideration,

A handwritten signature in black ink that reads "Beth Swedeen". The signature is written in a cursive, flowing style.

Beth Swedeen, Executive Director
Wisconsin Board for People with Developmental Disabilities

Wisconsin Community Action Program Association



January 11, 2018

TO: The Honorable Members of the Senate Committee on Public Benefits, Licensing & State-Federal Relations

FROM: Brad Paul, *BA*
Executive Director

Jonathan Bader *JB*
Programs & Policy Director

RE: SB 624 to Require Photo IDs for Wisconsin FoodShare Recipients

We want to thank the Committee Chair & Members for accepting our testimony on SB 624.

WISCAP is the statewide Association of Wisconsin's 16 anti-poverty Community Action Agencies and 2 special purpose agencies. Thirteen (13) of our members and 3 other partners coordinate the statewide distribution of federal TEFAP commodities to 334 food pantries, meal sites and shelters in every county. Food pantries in our network serve 200,000 people each month, while meal sites & shelters provide 45,000 meals each month. Community Action Agencies have been involved in addressing food security in Wisconsin for many decades. In November WISCAP passed a significant milestone - the distribution of 200 million pounds of commodities to local communities over the past 20 years.

WISCAP is opposed is to SB 624 for a number of reasons:

- Foremost is the hardship this would impose on elderly, blind & disabled people and rural residents.
- The provision would increase hunger in Wisconsin.
- The requirement would increase bureaucracy & program cost with no benefit to recipients.

Foremost is the hardship this would impose on elderly, blind & disabled people and rural residents. In order to comply with a photo ID requirement adult recipients would have to travel to the Human Services agency in their county to get their photo taken. This would be a considerable hardship for the 25% of SNAP recipients who are elderly, blind or disabled - many of whom either do not drive, lack a reliable vehicle or lack access to transportation. The 31% of FoodShare recipients in 47 rural counties often live a considerable distance from the county human services office and many lack reliable transportation and with no access to mass transit. During winter months they must contend with adverse weather. Requiring so many vulnerable citizens with small incomes who play by the rules to now obtain a photo ID to access basic nutrition seems a callous disregard for their already difficult circumstances.

The provision would increase hunger in Wisconsin. There is little doubt that thousands of honest, food insecure Wisconsinites – who are eligible for nutrition assistance – would feel so discouraged, challenged or frustrated by the ID requirement that they would either not apply or would see their existing benefits lapse or be disrupted. This, in turn, would impact countless children living in the affected households. The committee members and the legislature should be profoundly skeptical of any proposal that would create such adverse outcomes.

The requirement would increase bureaucracy & program cost with no benefit to recipients. Wisconsin has taken many steps over many administrations to improve the efficiency of FoodShare in Wisconsin to save taxpayer dollars. Central to this effort have been internet-based improvements like the ACCESS website so eligible citizens can apply for and manage their nutrition benefits from their homes & communities and use of the current EBT card to distribute benefits electronically. These improvements have limited costly and time-consuming face-to-face meetings with case workers. Implementing an unnecessary ID requirement goes counter to these cost-saving strategies. It would require substantial taxpayer dollars to pay for staffing, photographic equipment, software, machines to produce EBT Photo ID cards, as well as tens of thousands of hours in participant travel and associated costs. Fiscal estimates alone place implementation costs at \$7.6 million with ongoing annual costs of \$1.6 million. This is an enormous waste of taxpayer resources to address imagined fraud in a program with an established 97.5% payment accuracy rate.

For these reasons WISCAP strongly urges committee members to vote against SB 624.

For more information on WISCAP and Community Action's work on food security and anti-poverty initiatives please contact Brad Paul (608-244-4422) or Jonathan Bader (608-244-0745).

About WISCAP: *WISCAP is the statewide association of Wisconsin's 16 anti-poverty Community Action Agencies and 2 statewide special purpose agencies. Our network addresses the problems of poverty across multiple sectors by helping low-income people attain greater economic self-sufficiency and by relieving situations of distress. Community Action Agencies strengthen families and communities by providing programs and services, including housing, energy, transportation, education, health, business development, family support, and food security.*



DATE: January 11, 2018

TO: Senate Committee on Public Benefits, Licensing and State-Federal Relations

FR: Jon Peacock, Research Director

608.284.0580 ext. 307

jpeacock@kidsforward.net

RE: Opposition to Senate Bill 624 – photo ID requirement for FoodShare cards

Chairperson Kapenga and Committee:

Thank you for this opportunity to share the concerns of our organization, Kids Forward, about Senate Bill 624.

Kids Forward aspires to make Wisconsin a place where every child thrives by advocating for effective, long-lasting solutions that break down barriers to success for children and families. Using research and a community-informed approach, Kids Forward works to help every child, every family, and every community thrive.

We oppose SB 624 because putting photo IDs on FoodShare cards would be costly and inefficient, and it would impede legitimate use of cards by seniors, people who have disabilities, or others who need to have a friend or family member purchase food for them. As a result, it would increase hunger in our state.

The proposed requirement to show a photo ID card is inconsistent with federal law. As the Department of Health Services' fiscal estimate indicates, federal regulations allow states to require cards to include a photo ID, but they do not allow states to preclude the use of a card by people who are not pictured on the card.

The DHS fiscal estimate indicates that enactment of the bill would result in initial implementation costs of about \$7.6 million and ongoing annual costs of about \$1.6 million. On top of those costs, there's the risk of federal fines for violating the federal regulations relating to photo ID cards. In view of those costs and risks, there are much more cost-effective and less cumbersome ways to reduce improper use of FoodShare cards.

As the Hunger Task Force has pointed out, the payment error rate for Wisconsin's FoodShare program has declined from about 12.8% in 2008 to less than 2.6% in 2014. A photo ID card will do little, if anything, to improve on that record since it is lawful for other people to purchase food for a FoodShare participant. In addition, the small use of stolen or purchased cards is sometimes done with the assistance of a retailer, and the photo ID would have no impact on that problem. In light of all of this, a more cost-effective alternative is for the state to continue to improve its efforts to identify retailers who are allowing stolen or purchased cards to be used.



In addition to being expensive and cumbersome, the photo ID requirement will create additional stigma for people who are eligible for FoodShare benefits. The ID requirement is also likely to depress the use of FoodShare by people who cannot easily go to a welfare office to be photographed.

It is estimated that each federal dollar spent on FoodShare benefits generates \$1.70 in economic activity in a state—one of the highest multipliers among all federal expenditures. That does not mean that states should not take actions to minimize fraudulent or improper use of FoodShare benefits, but it does mean that states shouldn't create impediments that deter lawful uses of FoodShare benefits, while doing little to further reduce the fraudulent use of those cards.

FoodShare is a critically important program for about one in six Wisconsinites. We urge you not to impede their ability to get this much needed nutrition assistance.



Survival Coalition

of Wisconsin Disability Organizations

P.O. Box 7222, Madison, Wisconsin 53707

DATE: January 11, 2018

TO: Senator Kapenga, Chair, Senate Committee on Public Benefits, Licensing, and State-Federal Relations

FROM: The Survival Coalition of Wisconsin Disability Organizations

RE: Opposition to Senate Bill 624, photo identification cards for FoodShare recipients

The Survival Coalition of Wisconsin Disability Organizations is comprised of over 30 statewide groups representing people with all disabilities and all ages, their family members, advocates, and providers of disability services. We would like bring your attention to some very important concerns regarding Senate Bill 624 that we believe will significantly impact people with disabilities.

Adults with disabilities make up a disproportionate share of those living in poverty. In 2015, adults with disabilities made up 21 percent of those in poverty, while making up only 12.6 percent of the population as a whole. Given the high percentage of people with disabilities who are very poor, there is heavy reliance on the FoodShare program to help provide access to nutrition for people with disabilities. According to the Department of Health Services, 25% of FoodShare recipients are either elderly, blind, or have a disability; 46% of households receiving FoodShare benefits contain at least one individual that is either elderly, blind, or has a disability.

Many people with disabilities have limited access to reliable transportation and must rely on family members, neighbors, paid caregivers, or others in their support networks to assist them with purchasing food. Many people do not drive because of their disability, poverty, or lack of accessible transportation services in their community. Others have very limited mobility and ability to leave their home, due to the nature of their disability. Physical access to grocery stores can be difficult for people of low incomes, especially if the stores are distant, the store is not on a bus line, or the consumer has no vehicle. Carrying food from grocers can also be a challenge for individuals who must take public transit, walk long distances, or have other physical limitations.

The proposal to require photos of individual FoodShare recipients on their Electronic Benefits Transfer (EBT) cards will create barriers for people with disabilities for two significant reasons.

1. Federal rules require that all members of the FoodShare household and anyone permitted by the household to use the EBT card to purchase food for the household may use the card, irrespective of whose photo is on the card. Older adults and people with disabilities can designate a family member or non-household member to use their ID card and benefits to purchase food or meals for the household [7 CFR §273.2(n)(1)]. The name of the authorized representative must be recorded in the household's case record. Under federal

law, a photo ID on the EBT card of the head of household must not prohibit an authorized representative from using the card. The proposal to add a photo to their EBT card does not recognize the unique needs of people with disabilities, and they would be disproportionately harmed if they lose the ability to have a designated support person purchase food for them using an EBT card.

2. SB 624 would also require additional visits to the county income maintenance office to obtain the photo ID. This may be difficult for persons with disabilities, older adults, and others with limited access to transportation, and may cause some of the most vulnerable to drop off the program entirely.

We also note that implementing SB 624 will be very costly. The DHS fiscal estimate for SB 624 states that implementation would cost \$7,611,100 (\$3,569,050 GPR, \$234,700 Local, and \$3,807,350 FED) and ongoing costs are estimated at \$1,599,800 annually (\$761,800 GPR, \$800,200 FED). This is a major cost, and it may be low as it is based on DHS's estimate that photo EBT cards would need to be issued to 300,900 of the 670,800 FoodShare recipients.

In summary, if enacted, SB 624 would create barriers for people with disabilities to access their FoodShare benefits. People with disabilities already have limited transportation options and will likely face hardships in securing transportation to obtain a photo ID. Requiring and utilizing a photo ID will likely limit the ability to have family members, neighbors, paid caregivers, or other authorized representatives to purchase food for people with disabilities using an EBT card. As a result, SB 624 will lead to decreased participation in FoodShare and increased food insecurity for people with disabilities.

We ask that you oppose SB 624 for the reasons outlined above. Thank you for your consideration of our comments regarding this proposal.

Sincerely,

Survival Co-Chairs:

Maureen Ryan, moryan@charter.net; (608) 444-3842;
Beth Swedeen, beth.swedeen@wisconsin.gov; (608) 266-1166;
Kristin M. Kerschensteiner, kitk@drwi.org; (608) 267-0214;
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Survival Coalition Issue Teams: education, employment, housing, long term care for adults, long term care for children, mental health, transportation, workforce, voting, Medicaid and health care.

Real Lives, Real Work, Real Smart, Wisconsin
Investing in People with Disabilities

To: Senator Chris Kapenga, Chair, Senate Committee on Public Benefits, Licensing, and State-Federal Relations
Members, Senate Committee on Public Benefits, Licensing, and State-Federal Relations

From: Disability Rights Wisconsin

Date: January 11, 2018

Re: Testimony in Opposition to SB 624, photo identification cards for FoodShare recipients

Disability Rights Wisconsin (DRW) is the designated Protection and Advocacy system for Wisconsinites with disabilities. DRW is charged with protecting and enforcing the legal rights of individuals with disabilities, investigating systemic abuse and neglect, and ensuring access to supports and services, so that all Wisconsinites can learn, work, and live full lives in our communities free of abuse, neglect, and discrimination. Access to FoodShare benefits is an important issue for people with disabilities, both in terms of preventing neglect and promoting integrated community living.

We ask for your consideration of some major concerns regarding Senate Bill 624 that will negatively impact people with disabilities.

According to the Department of Health Services, 25 percent of FoodShare recipients are either elderly, blind, or have a disability. Forty-six percent of households receiving FoodShare benefits contain at least one individual that is either elderly, blind, or has a disability. Adults with disabilities also make up a disproportionate share of those living in poverty. In 2015, adults with disabilities made up 21 percent of those in poverty, while making up only 12.6 percent of the population as a whole. Women with disabilities represented 31.6 percent of women living in poverty but only 12.7 percent of women as a whole. Given the high percentage of people with disabilities who are very poor, there is heavy reliance on the FoodShare program to help provide access to nutrition for people with disabilities.

The proposal to require photos of individual FoodShare recipients on their Electronic Benefits Transfer (EBT) cards and for recipients to then present their cards to store clerks when purchasing food, will create significant barriers for people with disabilities. The most significant issue with this proposed legislation is that many people with disabilities rely on others to assist them with purchasing food as many people with disabilities have limited access to reliable transportation. Many people do not drive because of their disability, poverty, or lack of accessible transportation services in their community. The 2013 Transportation Survey for People with Disabilities in Wisconsin found that 75% of respondent said that transportation services impact their ability to shop and support local businesses, and 26% of respondents reported that there is no accessible transportation in their community. Others have very limited mobility and ability to leave their home, due to the nature of their disability.

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disabilityrightswi.org

800 928-8778 consumers & family

Given the lack of accessible transportation, many people with disabilities rely on family members, neighbors, paid caregivers, or others in their support network to purchase food for them. Federal rules require that a FoodShare household has the right to designate a family member or nonmember to use their ID card and benefits to purchase food or meals for the household [7 CFR §273.2(n)(1)]. The name of the authorized representative must be recorded in the household's case record. A photo ID on the EBT card of the head of household must not prohibit an authorized representative from using the card.

The proposed legislation does not address the unique needs of people with disabilities, who would be disproportionately harmed if they lose the ability to have a designated support person purchase food for them using an EBT card. In addition, this initiative would require additional visits to the county income maintenance office to obtain the photo ID. This may be difficult for persons with disabilities, older adults, and others with limited access to transportation, and may cause some of the most vulnerable to drop off the program entirely. The consolidation of two DMV offices in Madison into one center that is on a very limited MetroTransit line highlights the challenges of obtaining an ID for people who rely on public transportation.

We also note that implementing SB 624 will be very costly without addressing potential fraud within the FoodShare program. The DHS fiscal estimate for SB 624 states that implementation would cost \$7,611,100 (\$3,569,050 GPR, \$234,700 Local, and \$3,807,350 FED) and ongoing costs are estimated at \$1,599,800 annually (\$761,800 GPR, \$800,200 FED). This is a major cost and it may be low as it is based on DHS's estimate that photo EBT cards would need to be issued to 300,900 of the 670,800 FoodShare recipients.

In summary, if enacted, SB 624 would make it more difficult for people with disabilities to access their FoodShare benefits because it will likely limit the ability to have family members, neighbors, paid caregivers, or other authorized representatives to purchase food for them using an EBT card. We believe that placing photos on EBT cards would also be a hardship for many people with disabilities given lack of transportation to obtain a photo ID. As a result, SB 624 will lead to decreased participation in FoodShare and increased hunger for people with disabilities.

We ask that you oppose SB 624 for the reasons outlined above. Thank you for your consideration of our comments regarding this proposal.

MADISON	MILWAUKEE	RICE LAKE	
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January 11, 2018

To: The Honorable Chris Kapenga and Senate Committee on Public Benefits, Licensing and State-Federal Relations

Regarding: SB 624

Dear Chairman Kapenga and Committee Members,

I am representing the Lutheran Office for Public Policy, a statewide advocacy ministry of the Evangelical Lutheran Church in America. We advocate for just policies, especially related to hunger and poverty based on our social statements and Christian scripture.

I speak against SB 624 because securing a photo ID would create a barrier for many people to receive FoodShare. Traveling to obtain a photo ID would be challenging for individuals who are elderly and have disabilities. We are also concerned about how seniors and persons with disabilities will be able to designate another individual to purchase food via FoodShare for them if a photo ID is required on the EBT card.

Because of the profound problem of poverty in our state we need to do more to build a safety net for people who are hungry rather than place more barriers in front of them to receive the food they need. We could use the money SB 624 asks us to spend on other needed programs.

We speak against SB 624.

Sincerely,

Pastor Cindy Crane, Director

Truly I tell you, whatever you did not do for one of the least of these, you did not do for me.
Matthew 25:45



MEMBERS

African Methodist
Episcopal Church

American Baptist Churches
of Wisconsin

Armenian Oriental
Orthodox Church

Christian Church:
Disciples of Christ

Christian Methodist
Episcopal Church

Church of God in Christ (COGIC)

Church of the Brethren

Coptic Orthodox Church

Episcopal Church

Evangelical Lutheran
Church in America

Ecumenical Catholic Communion

Greek Orthodox Church

Mennonite Church USA

Moravian Church

Orthodox Church in America

Presbyterian Church (USA)

Reformed Church in America

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United Methodist Church

OBSERVERS

Roman Catholic

Archdiocese of Milwaukee

Diocese of Green Bay

Diocese of LaCrosse

ASSOCIATE MEMBERS

Benedictine Women of Madison

Church Women United

Interfaith Conference of Greater
Milwaukee

The Leadership Conference of
Women Religious Region 9

Madison-area Urban Ministry

Rev. Kerri Parker
Executive Director

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January 11, 2018

TO: Senate Committee on Public Benefits, Licensing, and State-
Federal Relations

FROM: Peter Bakken, Coordinator for Public Policy
Wisconsin Council of Churches

RE: Senate Bill 624, Photo Identification Cards for FoodShare Recipients

Thank you for taking my testimony on Senate Bill 624.

The Wisconsin Council of Churches (WCC) is a community of Christian denominations that covenant to pray and work together for the unity and renewal of the church and the healing and reconciliation of the world. The Council encompasses 19 denominations with approximately 2,000 congregations and over one million church members.

The issue of hunger has been at the forefront of the Council's efforts to promote social and economic justice for Wisconsin's most vulnerable residents. We believe that caring for the poor and feeding the hungry is a basic moral and religious responsibility. Our members are working alongside others in their community to end hunger – not only in food pantries, soup kitchens, and community gardens, but also by advocating for policies that will promote the good of the community and all its members.

We respect and share the aim of this bill to prevent waste, fraud and abuse in the FoodShare program. However, we have real concerns about its impact on those who turn to public assistance in time of need.

Senate Bill 624 is supposed to improve the stewardship of public funds while helping the truly needy. This is a praiseworthy goal. Unfortunately this bill will most likely have the opposite effect. Implementing this proposal would be very costly, while doing little if anything to reduce fraud. Further, it would undermine the very purpose of FoodShare (Wisconsin's name for SNAP, or the Supplemental Nutrition Assistance Program) by increasing the obstacles faced by people who are simply trying feed their families.

One of the reasons that FoodShare is such a valuable program is that it allows people who receive it to shop for food like everyone else. They are able to use their EBT card at grocery stores just like a debit card. Prior to the introduction of EBT cards, participants used paper coupons, which gave rise to the now-obsolete term "Food Stamps." As a result, it was obvious when someone was using their public benefits in the checkout line. That contributed to a stigma that even now deters many eligible people, especially seniors, from applying for FoodShare. In contrast, the EBT card provides people with access to food without setting them apart, allowing them to obtain it with dignity, freedom of choice, and personal responsibility.

*We pray and work together for the unity and renewal of the
church and the healing and reconciliation of the world*

This bill unnecessarily – and expensively -- complicates the FoodShare program. Persons needing assistance would have to travel to a public benefits office to have their photo taken. This runs counter to the progress Wisconsin has made in streamlining the application process through its online, multi-program application system. It creates new hurdles for people who have challenges finding the time or the means to travel to an office during its service hours. Those most affected would include those who need assistance the most: seniors, people with disabilities, families with children, and low-income workers. People who need help will be discouraged or prevented from applying.

This bill also introduces an added burden for business. If FoodShare participants are required to show a photo ID at the checkout line, federal rules require that everyone else using a debit or credit card would have to do the same – an added burden for retailers and an inconvenience for customers that would only increase resentment of the FoodShare program and its participants.

If the requirement for everyone to show a photo ID is sidestepped, people in poverty will be singled out and stigmatized. Treating all people with dignity and respect, regardless of their economic status, is not just a federal requirement – it is a moral obligation. While their economic circumstances may be limited, they are still our fellow human beings, our neighbors, and often our family members, friends or fellow worshippers.

We all want to reduce fraud, waste and abuse in public assistance programs. But we need to have a sense of balance, proportion, and compassionate understanding of the lives of the people impacted by these policies in order to make wise decisions about how to address those problems. For these reasons, the Wisconsin Council of Churches opposes SB 624.

Thank you for considering our position on this bill.