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AN EMERGING ISSUE IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM



Should Participants Be Subject to New Identification Requirements?

By Dan Lesser and Deanne Millison

Dan Lesser
Director, Economic Justice

Sargent Shriver National Center
on Poverty Law
50 E. Washington St. Suite 500
Chicago, IL 60602
312.368.2005
danlesser@povertylaw.org

Deanne Millison
Former Volunteer Attorney,
Sargent Shriver National Center
on Poverty Law

In the wake of severe state budget woes and a sagging economy, negative myths surrounding public benefit programs not surprisingly have regained a strong footing. One of the most persistent of these myths is that participants in the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamp Program) routinely traffic, or sell, their benefits at a discount for cash.¹ In an effort to appear tough on welfare fraud, legislators in several states have introduced proposals to establish new identification requirements for SNAP participants and limit the household members who may utilize the benefits. Here we evaluate the merits of these proposals by reviewing federal law, examining SNAP benefit trafficking, analyzing state cost considerations, and assessing the impact that new identification requirements at the point of sale would have on retailers and on SNAP recipients themselves.

The Program

SNAP is the nation's largest nutrition assistance program and our first line of defense against hunger and undernutrition.² The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) administers the SNAP program in partnership with the states. The program targets the most struggling families; about 93 percent of benefits go to households with income at or below the poverty line.³

The federal government pays 100 percent of the cost of SNAP benefits, which can be used by recipients to purchase food from retailers authorized by the USDA to participate in the program.⁴ Any member of the SNAP-defined household, and any authorized representative designated by the household, may redeem benefits.⁵ The federal and state governments share the cost of administering the program roughly equally.⁶

¹Audio House Floor Debate, H.B. 161, H.R. 97th Gen. Assemb., (Ill., April 12, 2011) (statement of Rep. Chapin Rose) (CD-ROM in Dan Lesser's files).

²Food and Research Action Center, A Review of Strategies to Bolster SNAP's Role in Improving Nutrition as well as Food Security 1 (Oct. 2011), <http://bit.ly/q8bCDF>.

³*Id.*

⁴U.S. GENERAL ACCOUNTING OFFICE, GAO/RCED-98-77, FOOD STAMP PROGRAM: INFORMATION ON TRAFFICKING FOOD STAMP BENEFITS 3 (March 1998), <http://1.usa.gov/qw5ZAP>.

⁵7 U.S.C. § 2016(h)(9)(b).

⁶U.S. GENERAL ACCOUNTING OFFICE, *supra* note 4, at 3.

Participation in SNAP has steadily increased as a result of the current economic downturn. In April 2008 almost twenty-eight million Americans participated in the SNAP program.⁷ By July 2011 participation had reached a record forty-five million, or approximately one in seven Americans.⁸

In 2004 FNS finished replacing paper food stamp coupons with electronic benefit transfer (EBT) cards, which are swiped like a debit card in a point-of-sale machine.⁹ Instead of monthly packets of paper food coupons, states must now issue a reusable plastic EBT card and a personal identification number (PIN) to each SNAP household. The EBT card PIN is used like a debit card PIN—a recipient types her identification number into the point-of-sale machine to authorize a food purchase.¹⁰ The point-of-sale machine deducts the purchase amount from the household's monthly SNAP allotment and creates an electronic record of the purchase amount, date, and time.¹¹

Federal Law

Under the Food and Nutrition Act of 2008, a state agency may require an EBT card to contain a photograph of one or more members of a SNAP household.¹² However, if an agency does adopt this requirement, it must “establish procedures to ensure that any other appropriate member of the household or any autho-

rized representative of the household may utilize the card.”¹³ Federal rules do not allow retailers to “single out [EBT card] users for special treatment in any way.”¹⁴ This means, for example, that if a SNAP benefit user must show photo identification at the point of sale, all other customers must do so as well.¹⁵ No state currently requires a photograph on the EBT card.

State Legislative Proposals

The legislative proposals that would impose new point-of-sale identification requirements on SNAP participants take a number of approaches:

- Three—Maine, Pennsylvania, and Minnesota—would require a photo of the head of household on the EBT card and restrict use of the card to the head of household.¹⁶
- Three would require a photo of the head of household on the EBT card and restrict use of the card to the head of household and one other person—in Illinois, a caregiver; in Michigan, a second household member whose picture also would be on the card; and in North Carolina, a second household member whose name would be on the card and who would have to show separate photo identification such as a driver's license.¹⁷ The fact sheet that Illinois advocates have used to oppose the Illinois proposal is reprinted on pages 297–98.

⁷Food and Nutrition Service, U.S. Department of Agriculture, Supplemental Nutrition Assistance Program: Monthly Data—National Level 1 (2011), <http://1.usa.gov/5gWOzq>.

⁸*Id.*

⁹U.S. GOVERNMENT ACCOUNTABILITY OFFICE, GAO-07-53, FOOD STAMP TRAFFICKING: FNS COULD ENHANCE PROGRAM INTEGRITY BY BETTER TARGETING STORES LIKELY TO TRAFFIC AND INCREASING PENALTIES 9 (Oct. 2006), <http://1.usa.gov/qbCIGb>.

¹⁰U.S. GENERAL ACCOUNTING OFFICE, *supra* note 4, at 3.

¹¹*Id.* at 6.

¹²Food and Nutrition Act of 2008, 7 U.S.C. § 2016(h)(9)(A).

¹³*Id.* § 2016(h)(9)(B).

¹⁴7 C.F.R. § 278.2(b) (2009).

¹⁵Letter from Ollice C. Holden, Midwest Region Administrator, U.S. Department of Agriculture, Food and Nutrition Service, to Michelle Saddler, Secretary, Illinois Department of Human Services (April 6, 2011) (in Dan Lesser's files).

¹⁶H.R. 63, 125th Leg., Reg. Sess. § 1 (Me. 2011), <http://bit.ly/mTSQ8R>; H.R. 392, 2011 Gen. Assemb., Reg. Sess. § 1(d) (Pa. 2011), <http://bit.ly/oBjVFH>; H.R. 238, 89th Leg., Reg. Sess. § 2 (Minn. 2011), <http://bit.ly/oxKOWh>.

¹⁷H.R. 161, 97th Leg., Reg. Sess. § 5(b) (Ill. 2011), <http://bit.ly/rmdtDb>; H.R. 4719, 96th Leg., Reg. Sess. § 1 (Mich. 2011), <http://1.usa.gov/qcY6j0>; H.R. 734, 2011 Gen. Assemb., Reg. Sess. § 1(a) (N.C. 2011), <http://bit.ly/qR8jE2>.

- Two—an Idaho bill and a second Minnesota bill—would require the head of household to show a separate photo identification card such as a driver’s license and restrict use of the card to the head of household.¹⁸
- An Arizona proposal would require both that a photo of the head of household be on the EBT card and that the head of household show a separate photo identification card such as a driver’s license, and the proposal would restrict use of the card to the head of household.¹⁹
- Another Idaho proposal would not require that a photo be on the EBT card but rather that each SNAP household have an identification card listing names of household members and authorized representatives along with their birth dates. The card would have to be shown at the retailer’s request.²⁰
- A New Hampshire proposal would require a SNAP photo identification card, separate from the EBT card, that any household member could use.²¹ The state agency determined that it would have to issue separate photo identification cards to each household member to comply with federal law.

Beyond these proposals, a law recently passed in Missouri requires photos of Temporary Assistance for Needy Families (TANF) recipients to appear on the EBT card and limits use of the card to those recipients.²² Missouri currently uses the same EBT card to deliver TANF and SNAP benefits; whether Missouri will implement this law in a way that attempts to limit the use of SNAP benefits

to the person pictured on the EBT card is unclear.

In sum, all the state proposals except the second of the Idaho proposals and the New Hampshire proposal conflict with the federal requirement that all household members and authorized representatives be able to use the EBT card. And all of the proposals would require retailers to alter their business practices and point-of-sale experience for all consumers, not just SNAP recipients, to satisfy the federal requirement that SNAP participants be treated the same as everyone else. What enforcement mechanism would be used when an authorized retailer fails to comply with these proposals or what impact these proposals would have on retail cashiers and other retail employees is not clear.

Trafficking

Trafficking is “the buying or selling of coupons ... for cash or consideration other than eligible food.”²³ New electronic technology has allowed SNAP administrators to reduce benefits trafficking to a fraction of its previous incidence when paper coupons were the method of delivery.

EBT cards have made trafficking benefits more difficult, thwarting most would-be SNAP traffickers.²⁴ This is not to say that some SNAP recipients have not found a way to traffic their benefits in the new EBT environment, but most trafficking now occurs directly between a small urban retailer and a SNAP recipient.²⁵ In these transactions a retailer swipes an EBT card for a certain amount of money and the

¹⁸H.R. 263, 61st Leg., Reg. Sess. § 2 (Idaho 2012), <http://1.usa.gov/pcUK02>; H.R. 171, 89th Leg., Reg. Sess. § 2 (Minn. 2011), <http://bit.ly/f772XX>.

¹⁹H.R. 2675, 50th Leg., Reg. Sess. § 2(A) (Ariz. 2011), <http://1.usa.gov/p0uknL>. To ensure maximum stigmatization of Supplemental Nutrition Assistance Program (SNAP) participants, the Arizona proposal would also require that the electronic benefits transfer card be in safety orange and include in large black print the phrase “Government Food Stamp Card.”

²⁰H.R. 317, 61st Leg., Reg. Sess. § 2 (Idaho 2012), <http://1.usa.gov/nTt5vK>.

²¹H.R. 485, 2011 Leg., Reg. Sess. (N.H. 2011), <http://bit.ly/g7MIe1>.

²²H.R. 73, 96th Gen. Assemb., Reg. Sess. § 1 (Mo. 2011), <http://bit.ly/purjyx>.

²³7 C.F.R. § 271.2 (2010).

²⁴U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 9, at 1.

²⁵*Id.* at 13.

cardholder provides the PIN; instead of supplying groceries, the retailer gives the cardholder a discounted amount of cash and retains the difference.²⁶

Electronic technology, starting with the data generated by SNAP transactions, including the date, time, and amount of every purchase, has greatly enhanced FNS' capacity to monitor, analyze, and prosecute SNAP benefits trafficking.²⁷ To investigate suspected traffickers, FNS traditionally sent undercover investigators into stores to attempt to traffic benefits.²⁸ FNS, with the advent of EBT, can pursue alleged traffickers based solely on suspicious transaction patterns.²⁹

FNS collects data from each state's EBT processors and mines the data for suspicious patterns of transaction activity, such as, for example, (1) multiple purchases from the same SNAP account in a brief period, (2) multiple SNAP purchases by multiple SNAP households in rapid succession from a single point of sale, (3) SNAP transactions that are unusually large for an individual, (4) SNAP purchases that completely deplete a participant's monthly allotment, (5) transactions that are large for the store's size and location, and (6) multiple SNAP redemptions in even dollar amounts.³⁰

Based on these and other criteria, EBT processors generate a list of suspicious retailers and individuals suspected of trafficking.³¹ FNS field offices send these lists to the respective states, which use

the lists to pursue, investigate, and disqualify recipients from the program for at least one year if they are found guilty of trafficking.³² States have a strong financial incentive to pursue cases against individuals suspected of trafficking since they may keep 35 percent of the value of the trafficked benefits.³³

State SNAP administrators credit the switch to EBT and the advent of more modernized monitoring technology for giving them another strong tool to prevent, identify, and investigate trafficking.³⁴ In March 2000, before the universal adoption of EBT cards, FNS estimated that 3.5 cents of every dollar of food stamp benefits was trafficked.³⁵ FNS now estimates that only one cent of every dollar of SNAP benefits is trafficked.³⁶

New Point-of-Sale Identification Requirements—an Unnecessary and Troublesome Public Policy

New SNAP identification requirements are bad public policy for several reasons. They are unnecessary and costly and would be ineffectual in reducing trafficking while imposing severe burdens on retailers.

Most Trafficking Not Prevented by ID Requirements. The sophisticated electronic records of SNAP use have allowed the federal government to gather a vast amount of information about SNAP expenditure patterns. One revelation from these data is that dishonest retailers are

²⁶*Id.* at 9.

²⁷*Id.*

²⁸*Id.*

²⁹*Fells v. United States*, 627 F.3d 1250, 1254 (7th Cir. 2010).

³⁰*Yacoub Hanna d/b/a Fleming Food Shoppe v. USDA*, No. 04-74627, 2007 WL 5971711, at *2 (2007); *Young Choi Incorporated v. United States*, 639 F. Supp. 2d 1169, 1185 (2009).

³¹U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 9, at 16.

³²*Id.*; 7 U.S.C. § 2015(b)(1)(A)(i).

³³7 C.F.R. §§ 273.18(a)(1)(ii), (b)(2), (k) (2011).

³⁴See U.S. GENERAL ACCOUNTING OFFICE, *supra* note 4, at 2; U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 9, at 4; Office of Research and Analysis, Food and Nutrition Service, U.S. Department of Agriculture, THE EXTENT OF TRAFFICKING IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM: 2006–2008, at 11 (March 2011), <http://1.usa.gov/qBKWg3>.

³⁵U.S. GENERAL ACCOUNTING OFFICE, GAO-01-881T, FOOD STAMP PROGRAM: PROGRAM INTEGRITY AND PARTICIPATION CHALLENGES 8 (June 27, 2001), <http://1.usa.gov/nJrFX6>.

³⁶Office of Research and Analysis, *supra* note 34, at 7.

active participants in most trafficking; this means that new identification requirements at the point of sale would scarcely affect these activities.³⁷ Because the correct PIN is the only information a retailer and a trafficking recipient need to complete a fraudulent transaction, matching the identity of the person using an EBT card with the identity of the person authorized to use the card would not deter retailer-assisted trafficking.

Furthermore, the concentration of trafficking among certain stores limits the new identification requirements' deterrent effect at the point of sale. Currently 87.3 percent of SNAP transactions occur in publicly owned, large supermarkets, but only 5.4 percent of trafficking occurs in these stores.³⁸ Conversely 8.9 percent of SNAP benefits are redeemed in privately owned, small convenience and grocery stores, but these stores account for almost 80 percent of the SNAP dollars trafficked.³⁹ The trafficking transactions that take place in these small convenience and grocery stores often transpire between retailers and SNAP recipients with whom the retailers are familiar.⁴⁰ Accordingly, when trafficking occurs, the retailer likely already knows, without use of photo identification, whether the EBT card belongs to the customer presenting it. As such, photo identification on EBT cards would not prevent retailers, specifically those in small convenience and grocery stores, from trafficking, and would thus have little effect on trafficking as a whole.

Burden on Retailers Participating in SNAP. New SNAP identification requirements at the point of sale would force retailers and their staff to examine photos

and other forms of identification to discern legitimate SNAP participants from illegitimate traffickers; this is a complicated task that retailers are neither trained nor hired to do. The prohibition on treating SNAP users differently would create several problems for retailers. Checking photo identification not only for SNAP recipients but also for every patron who uses any form of electronic payment, as would be necessary to comply with federal law, would complicate the point-of-sale experience for all shoppers, create delays in checkout lines, and lead to customer dissatisfaction and lost sales. Photo identification requirements would force retailers that have installed self-checkout point-of-sale machines—which facilitate, accelerate, and enhance the customer's shopping experience—to reintroduce frustrating and time-consuming clerk and customer interaction.⁴¹ The retailer's role would shift from providing good customer service to enforcing the law, and honest retailers would face penalties if their employees failed to check photo identification. Ultimately, as retailers suffer both needless inconvenience and a decline in sales, some likely would terminate their participation in SNAP altogether, thereby thwarting the program's purpose by reducing the ability of struggling families and individuals to purchase food.⁴²

Burden on SNAP Recipients. Federal law permits states to require photos on SNAP's EBT cards, providing that any other appropriate household member or authorized household representative may utilize the card.⁴³ This basic legal protection safeguards SNAP households from an enormous burden they would

³⁷U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 9, at 13.

³⁸Office of Research and Analysis, *supra* note 34, at 7.

³⁹*Id.* at 8.

⁴⁰U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 9, at 4.

⁴¹The U.S. Department of Agriculture has instructed retailers that they may not restrict which checkout lanes SNAP participants may use (Food and Nutrition Service, U.S. Department of Agriculture, The Food Stamp Program: A Training Guide for Retailers (Sept. 2005), <http://1.usa.gov/qo3CmV>).

⁴²The Illinois Food Retailers Association and the Illinois Retail Merchants Association both opposed SNAP photo identification legislation introduced in Illinois (see the fact sheet on pages 297–98 listing opponents to the Illinois legislation).

⁴³7 U.S.C. §2016(h)(9).

otherwise have to endure. For example, in Illinois approximately 1.8 million people who reside in 850,000 households receive SNAP benefits.⁴⁴ If use of the EBT card were limited to the head of household pictured on the card, one million Illinois residents, including the cardholder's spouse, children, parent, or any other household member, would be prohibited from using the household SNAP card to shop for groceries.

Although the Illinois proposal includes a caregiver exception, other states' proposals have none. Limiting use of the EBT card to the head of household pictured on the card in these states would be especially cumbersome for recipients who are elderly or who have disabilities and who often rely on relatives and friends to purchase groceries on their behalf, and for single working parents who cannot shop when grocery stores are open. These limitations could cause millions of dollars in SNAP benefits to go unused.⁴⁵

In an environment of shrinking state program funding and administrative resources, states across the country have been modernizing their business models to make service delivery more efficient.⁴⁶ For example, forty-seven states now waive face-to-face interviews in some fashion to allow SNAP recipients to access services through the Internet, mail, and telephone besides traditional

in-person visits to local aid offices.⁴⁷ This flexibility, made possible by electronic verification of identity and other eligibility factors, has allowed service delivery to be more effective and efficient for low-income households and more economical for states.⁴⁸ Requiring SNAP household members to visit local aid offices in person to be photographed would reverse this trend and undermine the modernized improvements in service delivery. Requiring visits to the local aid office would also inflict unnecessary hardship on seniors, working recipients, and those with disabilities.⁴⁹

Exceedingly Costly to States. Implementing new identification requirements, especially photo identification, at the point of sale would impose substantial costs on taxpayers with no savings for the state since SNAP benefits are 100 percent federally funded. States would be required to install costly photographic equipment—cameras, software, printers, and printing ribbon—in each local office.⁵⁰ States would have to manage costs stemming from increased visits to local offices, training and hiring additional personnel to issue the new cards, purchasing new cards, and, if necessary, renegotiating contracts with current EBT card vendors.⁵¹ Photo identification requirements would entail a costly change in business processes in states that issue SNAP's EBT cards by mail.⁵² Three states

⁴⁴Food Research and Action Center, SNAP/Food Stamp Monthly Participation Data 2011: January 2011 Participation Tables 1 (March 2011), <http://bit.ly/skQ8hj>; Just the Facts: A Monthly Public Assistance Update from the Illinois Department of Human Services (May 2011), <http://bit.ly/p99CQM>.

⁴⁵Certain types of SNAP households would be especially burdened by new point-of-sale identification requirements; among these are the destitute who have the right to receive expedited benefits within seven calendar days; households where adults apply for eligible children but not for themselves; households with authorized representatives who would not otherwise have to go to the SNAP office but would now need to be photographed; and households receiving onetime disaster assistance.

⁴⁶FOOD AND NUTRITION SERVICE, U.S. DEPARTMENT OF AGRICULTURE, CALL CENTER/CONTACT CENTER SUPPORT FOR STATES: A FRAMEWORK AND REFERENCE GUIDE 7 (Aug. 2011), <http://1.usa.gov/nMchAL>.

⁴⁷Food and Nutrition Service, U.S. Department of Agriculture, Supplemental Nutrition Assistance Program: State Options Report 21 (Nov. 2010), <http://1.usa.gov/iHvF8D>. Regulations require state agencies to conduct face-to-face interviews at initial certification and at least annually as part of SNAP recipient certification (7 C.F.R. 273.2(e) (2009)). States now may request a waiver of this requirement that all households receive face-to-face interviews at any certification point (Food and Nutrition Service, *supra* note 41, at 8).

⁴⁸Food and Nutrition Service, State Options Report, *supra* note 47, at 21.

⁴⁹See Community Legal Services of Philadelphia, Don't Force Seniors to the Welfare Office to Be Photographed (April 6, 2011), <http://bit.ly/o9Hu69>.

⁵⁰Holden, *supra* note 15.

⁵¹H.R. 485, 2011 Leg., Reg. Sess. (N.H. 2011).

⁵²Holden, *supra* note 15.

that estimated these costs—Idaho, Illinois, and Pennsylvania—each concluded that the cost would be several million dollars.⁵³ Proposals that do not require photos but alter EBT card issuance in other ways would be costly. And, since the composition of low-income households changes frequently, updating photographs or lists of authorized EBT users would be not only a burden on SNAP participants but also a costly, ongoing drain of state resources. As the economic downturn continues, local aid offices lack sufficient funding, personnel, and other resources to meet the greatly increased demand for assistance. Without a significant influx of new resources, these offices would be incapable of administering costly new point-of-sale identification requirements without further compromising customer service, increasing the chance for errors in calculating benefits, and reducing the effectiveness of program integrity measures already in place.

Unnecessary. While preventing SNAP benefits trafficking is ideal, enforcement efforts should be cost-effective, targeted, and not unduly burdensome on honest SNAP participants. FNS, in conjunction with individual states, has such a system in place. Advanced technology has enabled states to incorporate a strict and comprehensive prevention and enforcement strategy. This strategy

has reduced the SNAP trafficking rate from 3.5 percent to 1 percent and has cemented program integrity while preventing forty-four million needy recipients from falling victim to hunger each year—all while further mainstreaming low-income consumers into traditional market point-of-sale experiences with technology that works well for retailers.



An unfounded myth of rampant SNAP benefits trafficking has led to the introduction of photo identification and other new point-of-sale identification requirement legislation that threatens to weaken the SNAP program and harm its participants. In reality, trafficking is a declining problem with effective prevention, investigation, and enforcement policies already in place. Notwithstanding the success of these policies, a small amount of trafficking still occurs, primarily that committed through dishonest retailers. The proposed new legislation would not prevent this problem. Instead the burden of the legislation would fall primarily on already strapped state budgets and the most vulnerable SNAP program participants, who would find using their SNAP benefits to purchase food far more difficult and whose shopping options would be narrowed even further as honest retailers become discouraged from participating in the program.

⁵³H.B. 0161, 97th Leg., Reg. Sess. (Ill. 2011), <http://bit.ly/qd9oC5>; Community Legal Services of Philadelphia, *supra* note 49.

[Reprinted below is the fact sheet that Illinois advocates used to oppose a bill introduced in the Illinois legislature to impose a new Supplemental Nutrition Assistance Program point-of-sale identification requirement. The substantive reasons for opposition took up one side of the page while the broad range of organizations opposed to the proposal was listed on the reverse side. Advocates who are facing similar proposals in other states are welcome to adapt these arguments to fit their circumstances.—**Dan Lesser**]

Oppose House Bill 161 (Righter-Cultra-McCarter)—the Food Stamps LINK Card Photo Identification Bill

What House Bill 161 would do: It would require the Illinois Department of Human Services (IDHS) to seek a waiver from the federal government that would allow Illinois to limit use of the food stamps LINK (electronic benefits transfer) card to the cardholder whose photo would appear on the card. The bill is intended to prevent Food Stamps from being “trafficked,” i.e., sold for cash. When recently consulted on this legislation, the U.S. Department of Agriculture (USDA) wrote to IDHS, “We do not believe that photos on EBT cards are a cost effective solution to integrity concerns.”

Reasons to oppose House Bill 161:

1. *The bill is unnecessary.* According to a March 2011 USDA report, the electronic delivery of food stamp benefits has made trafficking much easier to trace, prevent and prosecute. The food stamp trafficking rate has declined from 3.5% to 1% during the past 10 years.
2. *The bill would not achieve its stated purpose.* Food Stamp trafficking generally occurs between the cardholder and the corner store retailer, which this bill would not affect.
3. *Implementing the waiver would waste millions of taxpayer dollars.* If the waiver request was granted and implemented, several million taxpayer dollars would be wasted as IDHS would have to install photographic equipment in its local offices, process 40,000 cards per month, hire additional staff, and pay the private vendor to issue new LINK photo ID cards.
4. *The bill would produce zero savings to the State.* Food stamps are 100% federally funded, so implementing House Bill 161’s waiver would produce no cost savings for the state.
5. *The bill imposes a serious burden on families that receive Food Stamps.* Limiting use of the LINK card to the cardholder would prevent every other

member of the food stamp household, which may include the cardholder’s husband, wife, children and parents, from going to the store and using the LINK card.

6. *No other state puts a photo on the Food Stamps electronic benefits transfer card because it is costly to implement, onerous to maintain, and ineffective in stopping trafficking.*

[Some] 1.8 million people in Illinois receive Food Stamps, hundreds of thousands of whom have never had to rely on public benefits before. Don’t make their lives worse. Oppose House Bill 161.

Organizations that Oppose House Bill 161, Amendment 1

Antihunger Groups

Feeding Illinois
Greater Chicago Food Depository
Illinois Hunger Coalition
Eastern Illinois Food Bank
Oak Park River Forest Food Pantry
River Bend Food Bank
Vital Bridges NFP Inc.

Business Groups

Illinois Food Retailers Association
Illinois Retail Merchants Association

Labor Groups

AFSCME Council 31
SEIU Healthcare Illinois

Local Governments and State Commissions

City of Chicago
Illinois Commission on the Elimination of Poverty

Oppose House Bill 161 (Righter-Cultra-McCarter), Continued

Children's Health and Well-Being Groups

AIDS Foundation of Illinois
Campaign for Better Health Care
Health and Disability Advocates
Illinois Action for Children
Illinois Association for the Education of Young Children
Illinois Maternal and Child Health Coalition
Illinois Public Health Association
Ounce of Prevention Fund
Planned Parenthood
Voices for Illinois Children

Economic Security and Opportunity Groups

Sargent Shriver National Center on Poverty Law
Action Now
Chicago Coalition for the Homeless
Chicago Jobs Council
DuPage Federation on Human Services Reform
Heartland Alliance for Human Needs & Human Rights
Housing Action Illinois

Illinois Association of Community Action Agencies
National Association of Social Workers—Illinois Chapter
Women Employed

Civil Rights Groups

AgeOptions
American Civil Liberties Union
Arc of Illinois
Chicago Legal Advocacy for Incarcerated Mothers
Illinois Coalition for Immigrant and Refugee Rights

Faith-Based Groups

ARISE Chicago
Chosen Tabernacle Ministries
Council of Islamic Organizations
Jewish Federation of Metropolitan Chicago
Lutheran Advocacy of Illinois
Lutheran Social Services of Illinois
Project IRENE
Protestants for the Common Good



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