



August 30, 2024
<Sent via electronic mail>

The Honorable Mike Johnson
Speaker of the United States House of Representatives
United States Capitol
Washington, DC 20515
c/o Jules.Hurst@mail.house.gov

RE: Extension of Stolen EBT Replacements

Dear Speaker Johnson,

On behalf of the United Council on Welfare Fraud (UCOWF), I am writing to express our concerns regarding the recent push to extend reimbursement to victims of Supplemental Nutrition Assistance Program (SNAP, or food stamps), Temporary Assistance to Needy Families (TANF, or cash welfare), and Women Infant Children (WIC) theft of benefits via Electronic Benefit Transfer (EBT) “skimming and account takeovers.”¹

While the intention to support vulnerable populations is commendable, we believe that focusing solely on reimbursements without addressing the underlying systemic vulnerabilities will continue to exacerbate the problem.

As the only national non-profit organization dedicated to combating fraud, waste, and abuse within social service programs, UCOWF has been at the forefront of this mission for over 50 years. At our National Conference last week, we heard from county and state welfare fraud investigators from around the nation, and the message was the loud and clear: investigators who already lack staffing and resources to only address 46% of fraud referrals, have had their duties redirected to screening the deluge of requests for reimbursement.

While this issue remains, the very people striving to safeguard these federal programs and resources are further stretched with no end in sight. Laying the blame solely on “skimming devices” is either an intentional attempt to deflect accountability for addressing the problem, or it demonstrates a troubling lack of situational awareness.

The recent surge in EBT skimming and account takeovers (ATO) underscores the critical need for robust preventative measures rather than retrospective reimbursements. According to industry experts, the rise in EBT fraud is not just a result of traditional skimming devices but also due to sophisticated ATO techniques that exploit systemic weaknesses such as insufficient identity verification protocols, poorly secured customer service portals, lack of bot attacks to stop transnational fraud rings, and vulnerabilities in call center operations.

¹ <https://ruppersberger.house.gov/news-room/press-releases/ruppersberger-leads-effort-extend-reimbursement-victims-snap-theft>

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Due to antiquated rules and regulations, these safety net programs are still devoid of customer identity requirements – and we’ve all seen how criminals exploited similarly vulnerable programs during the Covid Pandemic Health Emergency that resulted in the unprecedented theft of taxpayer resources. These issues are what drove UCOWF to issue a comprehensive list of recommendations to address SNAP program integrity as it relates to recipient fraud and abuse, retailer fraud, and administrative waste. We encourage you and your staff to also consider these solutions in the Farm Bill.²

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Reimbursing victims without simultaneously strengthening these areas will only perpetuate the cycle of fraud, leading to ongoing losses that ultimately undermine the integrity of the SNAP program. Instead, we urge Congress to prioritize and mandate the implementation of advanced identity verification solutions, enhanced monitoring of point-of-sale (POS) devices, and the deployment of multi-layered security measures across state-managed EBT systems that are currently used successfully in the credit/debit card industry. The solutions exist, but neither state SNAP agencies nor EBT vendors should be responsible for funding the systemic failure to properly administer and guide these federal programs.

Such proactive measures will protect not only the current recipients but also the long-term viability of the program. We believe that by focusing on prevention, we can reduce the incidence of fraud, thereby ensuring that benefits reach those truly in need without the financial strain of constant reimbursements.

We respectfully ask that you consider these points as you deliberate on the extension of reimbursement provisions and encourage a balanced approach that prioritizes both victim support and fraud prevention.

Please let me know if UCOWF can be of further assistance to you as you rein in fraud, waste, and abuse in government assistance programs.

Sincerely,

Ashley Wilkes, President
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² https://www.ucowf.net/assets/pdf/UCOWF_Improving+SNAP_Program+Integrity+Initiatives+2024+FINAL