



DCF Legislative Testimony

April 8, 2026

TESTIMONY OF: Dr. Carla Whiteside-Hicks, Director of Economic and Employment Services

TESTIMONY ON: Performance Audit Report: Reviewing Supplemental Nutrition Assistance Program (SNAP) Payment Error Rates (PER) and Benefit Card Transactions, Part 2 (March 2026).

DCF SNAP #2 AUDIT RESPONSE

Chair Thompson and members of the committee, thank you for the opportunity to respond to the Performance Audit Report: Reviewing Supplemental Nutrition Assistance Program (SNAP) Payment Error Rates (PER) and Benefit Card Transactions, Part 2 (March 2026). We appreciated the professional conduct and attention to detail of the LPA staff during the course of this review.

Before addressing the findings of the report, DCF would like to offer insight into benefit payments made to clients who may have moved, as well as EBT transaction monitoring:

- Since 2000, FNS has required EBT interoperability with each state's EBT Contract. EBT Interoperability is the technical capability allowing Electronic Benefit Transfer (EBT) cards to be used seamlessly across state borders at authorized retail locations nationwide.
 - o While it is legal to use your EBT card outside of the state where you reside, DCF receives daily reports on EBT transactions and monitors cards used solely out of state, used several times in a row out of state, and when the transactions are manually keyed instead of swiped. These are all examples of potential fraudulent transactions or a residence change.
- Kansas continues to participate quarterly in the Public Assistance Reporting Information System (PARIS) match, which is federally administered by the Administration for Children and Families (ACF).
 - o This system checks each beneficiary for participation in another state. PARIS is not limited to SNAP; its data also provides the agency with indication participants have experienced a move or may no longer be Kansas residents.
- Additionally, Kansas launched the National Accuracy Clearinghouse (NAC) in February 2026. The NAC is a new nationwide system checked at application, recertification, and when household members change in order to prevent duplicate participation.
 - o The NAC conducts mass matching on a monthly basis for states to ensure no household is receiving duplicate SNAP benefits. At this time there are 14 states that have launched, with the remaining states set to implement by the end of 2027.

To address the audits finding that *'to comply with State Law, Department for Children and Families officials should offer to place recipient photographs on Snap EBT Card'* comes with the following considerations and logistical implications:

First, SNAP requires a broader range of individuals to be included in the SNAP "household" and considers their income and cooperation with other program requirements, unlike other means-tested federal programs. One card is issued to the entire household.

- The "household composition" rule highlights the fact that multiple adults within a SNAP household are authorized to use the same EBT card at any time – as do other people authorized by the head of household, such as helping neighbors when the recipient is sick or teenage children who run errands.

A single photo may not match all authorized individuals and may create a barrier to the food they are entitled to.

- Additionally, the FNS Retailer Guide states that the cardholder is not required to pass the EBT card to the cashier/store clerk, but to swipe at the POS machine on the other side of the counter, if available. Very rarely should a cashier or store clerk handle cardholder's EBT card.
- As a number of people are authorized to use the EBT card, the state must determine whose photo would be required, how individuals will be informed of their right to use the card, and how retailers are to ensure that all authorized individuals may do so.

Federal regulations enable a SNAP household to designate an “authorized representative” to help the household file the SNAP application and recertifications, to participate in interviews on behalf of the SNAP household, and/or to receive an EBT card in addition to the SNAP recipient.

- Authorized reps can be appointed to assist only with Food Assistance, or just TANF and CC or all card benefits. In regard to the EBT Card, the client can assign an authorized representative but may mark that they do not want them to have a separate card.
- Many SNAP participants who are unable to get to the store due to physical condition or who require help in managing their finances due to mental impairment often rely upon authorized representatives to buy food for them. Photo EBT card requirements make it harder for friends, family members, and volunteers to assist individuals with severe needs. Moreover, individuals with disabilities may not be able to go to the office themselves to provide a photo.
- Additionally, there need not be a determination of disability to appoint an authorized representative. The SNAP household may limit the role of that representative (for example, to assist with food purchase only), and the state agency can issue a separate EBT card for the authorized case head or local organization providing regular food shopping assistance to the recipient, such as a group home or an organization with personal care attendants (staff which may vary from month to month). For example, for individuals living in group housing for developmental disabilities, the authorized representative is the fiscal staff at the facility.

Federal SNAP regulations require that applicants submit to a state agency interview as well as provide verification of identity, residence, immigration status, earned and unearned income, and other financial and categorical eligibility factors specific to the household.

- States are increasingly choosing to waive face-to-face interviews and conduct phone interviews for program efficiency and in recognition of the costs of maintaining local SNAP offices. If a state chooses to impose a face-to-face interview requirement, the state must waive face-to-face interviews in hardship situations – including where the SNAP applicant has an illness, disability, lacks transportation, has a job or training commitment, or lacks child care. If a state has waived the face-to-face interview, then it faces a challenge in obtaining a photo for the EBT card, since requiring an individual to come into the SNAP office would undermine the interview waiver.

Federal regulations require that SNAP benefits be “interoperable” between states, allowing recipients to make authorized grocery purchases across state borders.

- Since 2000, FNS has required EBT interoperability with each state's EBT Contract. EBT Interoperability is the technical capability allowing EBT cards to be used seamlessly across state borders at authorized retail locations nationwide. Kansas cannot prohibit out of state EBT transactions.
- An EBT card issued by one state must thus be able to serve as a form of payment for the SNAP recipient in all other states, and it must be honored by participating retailers in all other states.
 - o This means that, if state A has adopted a photo EBT card policy, retailers in state A still need to accept the non-photo EBT cards of SNAP participants from state B.
 - o Many logistical complications may arise in an effort to meet these various requirements, without any clear enforcement mechanism.
- 7 CFR 274.7(f) requires equal treatment of SNAP households by retailers and vendors. The rights of SNAP clients to access their benefits could be placed at risk if retailers are asked to impose burdens on their grocery checkout employees to inspect not only the photo EBT cards of SNAP customers but also the photo IDs of non-SNAP customers.

Additionally, with the state's current EBT contract, the cost for each card with no photo is \$0.20, and the cost for each photo EBT card is \$2.65. Based on January 2026 data the additional cost for implementation, equipment, and training/education for cardholders, staff, and retailers if the agency were to offer the photo ID is as follows:

- **97,370 active EBT cards** for 88,565 households.
 - o At this participation rate, **the cost to renew all cards to include photo ID would be approximately \$258,030.**
- **An increase in the amount of SNAP would require an increase in SGF by approximately \$111,882.**
 - The current funding mix for EBT card costs in FY26 includes:
 - o SGF (43.36%),
 - o Federal SNAP Admin (43.36%),
 - o Federal TANF (1.19%); and
 - o Federal CCDF (12.09%).
 - *The change in the SGF SNAP administrative match rate to 75% of spending beginning 10/1/26 will increase the amount of SGF required.*

Without fiscal appropriation by the Kansas legislature to pay for the reissuance of all current (and future) EBT cards with a photo of a household member, the agency cannot begin taking steps to plan for implementation of the recommended finding.

Thank you again for the opportunity to provide a response to the LPA Performance Audit on the TANF program.