PUBLIC SUBMISSION

As of: 5/21/26, 8:23 AM
Received: March 11, 2026
Status: Posted
Posted: May 21, 2026
Category: Advocacy - Other
Tracking No. mmm-c4pu-iwdc
Comments Due: May 11, 2026
Submission Type: Web

Docket: FNS-2026-0134
Agency Information Collection Activities: Supplemental Nutrition Assistance Program Trafficking Controls and Fraud Investigations (Card Replacement)

Comment On: FNS-2026-0134-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program Trafficking Controls and Fraud Investigations (Card Replacement)

Document: FNS-2026-0134-0002
Comment on FR Doc # 2026-04775

Submitter Information

Organization: Lincoln Land Community Partners

General Comment

Agency Information Collection Activities; SNAP Trafficking Controls and Fraud Investigations (OMB Control Number: 0584-0587)

To the Food and Nutrition Service:

I am submitting these comments to strongly oppose the implementation of "excessive" EBT card replacement monitoring as a primary indicator of fraud. The proposed information collection fails to account for systemic administrative barriers and disproportionately harms the very populations the program is mandated to protect under federal law.

1. Failure to Protect Vulnerable Populations (7 U.S.C. § 2016)
Per 7 U.S.C. § 2016(h)(8)(C), State agencies must act to protect homeless persons, persons with disabilities, and victims of crime who lose cards without intent to defraud. The current "excessive request" triggers (four cards in 12 months) fail this mandate:

The Unhoused and Disabled: Individuals facing housing instability frequently have personal items stolen or lost due to lack of secure storage. Similarly, those with cognitive impairments, memory loss, or concentration issues (ADHD/Mental Health) are at a higher risk of losing cards or experiencing technical errors, such as entering an incorrect PIN three times or damaging a magnetic strip.

The "Fraud" Misconception: Card replacement is not a reliable indicator of trafficking. Just as banks automatically replace debit cards for fraudulent charges or damage, SNAP participants should not be met with suspicion for seeking to maintain access to their entitlement—a right of title to these benefits.

2. Gross Underestimation of Administrative Burden
The FNS estimate of 0.5 hours for a household to contact a state agency is fundamentally inaccurate. Local office operations reveal a much higher burden:

Communication Barriers: Automated systems often no longer allow Social Security Numbers to retrieve accounts, making it nearly impossible to cancel a card by phone.

Wait Times and Closures: Reaching a local office by phone is near impossible. For in-person visits, lines are long, and many offices close entirely for lunch (e.g., 12:00 PM – 1:30 PM), halting all service.

3. Systemic Data Integrity and Privacy Risks
The current Integrated Eligibility System (IES) mandates a mailing address for all participants, creating a cascade of failures when one does not exist:

The "Bad Address" Work-around: When a participant lacks a secure address, staff often use a placeholder or the last known address to bypass system "hard stops." This is not a solution; it is a point of failure.

Unauthorized Disclosure: Sending sensitive notices or EBT cards to vacant or unsecure addresses constitutes a breach of confidentiality and increases the risk of identity theft.

Mailing Instability: If an address is vacant, the USPS blocks delivery. Agencies that insist on mailing cards to these addresses knowingly set participants up for a "failure to receive," which then triggers the very "excessive replacement" monitoring this notice describes.

4. Proposed Solutions to Eliminate the "Food Gap"
To fulfill the mandate of 7 U.S.C. § 2016, the Secretary should implement the following:

Mandatory In-Office Distribution: Restore the right of households to receive a replacement card over-the-counter at local offices. This eliminates the 7–10 day wait period—a critical gap that forces families into hunger—and allows for an immediate, in-person explanation of card loss.

Default to Local Office Address: Mandate that for any household designated as "homeless," the mailing address should default to the local office address. This ensures notices and cards are held securely for pick-up. DHS Worker Action Guide (WAG 06-04-03) actually permits

using the local office address for homeless customers with administrator approval. However, it isn't practised consistently.

Equal Protection: SNAP participants should receive the same protections as credit/debit card holders, whose liability for lost or stolen cards is limited by federal law without an immediate accusation of theft.

Conclusion:
Treating an essential nutrition benefit as a "suspicious activity" trigger is abusive and contrary to the stated policy of Congress to promote the general welfare. The FNS should prioritize administering benefits correctly and improving its own performance rather than creating hurdles that threaten the food security of the most vulnerable.

Lincoln Land Community Partners