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General Comment

The following comments are submitted regarding the Food and Nutrition Service (FNS) notice addressing monitoring requirements for excessive Electronic Benefit Transfer (EBT) card replacement requests under the Supplemental Nutrition Assistance Program (SNAP).

From an investigative perspective, excessive EBT card issuance is not simply an administrative matter. Repeated replacement requests frequently serve as a clear behavioral indicator of SNAP trafficking and benefit theft schemes. For this reason, the monitoring and reporting requirements described in this notice provide important support for fraud detection and program integrity efforts.

Excessive Card Replacement as a Trafficking Indicator

Fraud investigators regularly encounter trafficking schemes in which EBT cards are intentionally transferred to third parties in exchange for

cash or other unauthorized benefits. In many of these cases, recipients request multiple replacement cards in order to provide traffickers continued access to benefits while attempting to avoid detection.

Patterns of frequent replacement cards are therefore commonly associated with trafficking activity, particularly when they appear alongside other indicators such as rapid benefit depletion, concentrated transactions at a limited number of retailers, or similar transactional behavior across multiple households.

Monitoring excessive card replacement requests helps investigators identify these patterns earlier and allows agencies to intervene before trafficking activity becomes more widespread.

Link to EBT Account Takeovers

Frequent replacement cards are also increasingly associated with EBT account takeover schemes. Organized criminals who obtain recipient information may request replacement cards in order to gain or maintain control over a victim's account.

Multiple card issuances allow fraud actors to continue accessing benefits even after a compromised card is canceled or reported lost. In some cases, replacement cards are intercepted through the mail or requested repeatedly to maintain uninterrupted access to stolen benefits.

For this reason, excessive card replacement activity can function as an early warning indicator of account compromise and benefit theft.

Importance of Monitoring Requirements

The requirement that state agencies monitor excessive card replacement requests and notify households when thresholds are exceeded is an important safeguard. These notifications help deter trafficking activity while also alerting recipients to possible misuse of their accounts.

The data generated through this monitoring process is also valuable to program integrity units and fraud investigators. Replacement card activity, when analyzed alongside transaction data, can reveal patterns associated with organized fraud.

Conclusion

Monitoring excessive EBT card replacement requests provide meaningful value in detecting SNAP trafficking and benefit theft. Patterns of frequent card issuance are commonly observed in both trafficking investigations and account takeover cases. In fact, CWFIA believes that the option to keep issuing free EBT cards after attaining the threshold should be restricted to only those states that meet the less than six percent error rate threshold.

Maintaining strong oversight of replacement card activity helps protect program funds, support fraud investigations, and ensure benefits remain available to eligible households.

Attachments

Virtual Meeting Link