PUBLIC SUBMISSION

As of: 5/21/26, 8:26 AM
Received: March 27, 2026
Status: Posted
Posted: May 21, 2026
Category: Govt.-Federal
Tracking No. mn9-2l4p-6inb
Comments Due: May 11, 2026
Submission Type: API

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-2026-0134-0004
Comment on FR Doc # 2026-04775

Submitter Information

Email: Laura.Sudkamp@ky.gov
Government Agency Type: State
Government Agency: Kentucky - Office of Program Performance

General Comment

To reduce waste, fraud, and abuse of taxpayer funds, FNS is urged to strengthen the proposed rule at 7 CFR 274.6(b)(6) by making its requirements mandatory rather than optional, and by enforcing compliance penalties on states.

1. Mandate Card Withholding (Not Optional): The current proposal sounds discretionary. It should be mandatory that state agencies take action.
• Original Wording: “State agencies also have the option to withhold the replacement card if the household has reached the excessive card replacement threshold set by the state agency.”
• Suggested Mandatory Wording: "State agencies must withhold the replacement card when the household has reached the excessive card replacement threshold of four replacements. The recipient must contact the agency to discuss the reason for the multiple replacements before

the replacement card will be released."
2. Mandate Interview for Excessive Requests:
• Original Wording: “State agencies have the option to require that a household member contact the state agency to explain the reason for requesting a new EBT card if the state agency determines that the requests are excessive.”
• Suggested Mandatory Wording: "State agencies must require a household member to contact the state agency to explain the reason for requesting a new EBT card when more than four cards are replaced in a 12-month period."
3. Presumption of Fraud:
• Original Wording: “If fraud is suspected, the state agency will refer the household for investigation and, when deemed necessary, provide written notification to the household.”
• Suggested Revision: Fraud is presumed to exist until the household discusses with the state agency the reason why multiple cards have been requested.
4. Define and Limit Good Cause: While states must protect vulnerable populations, "good cause" for replacing multiple cards should be strictly defined. Below are some examples:
• Natural disasters (verified)
• Documented theft
• Documented medical issues (e.g., severe memory loss/mental acuity issues)
• Abuse
5. Rolling 12-Month Definition: Explicitly define the "12-month period" as a rolling 12 months from the date of the first replacement card request, not a calendar year, to ensure accurate monitoring.

Attachments

Comment on SNAP Trafficking Controls and Fraud Investigations_