



Partners *for a*
Hunger-Free Oregon

Ending hunger before it begins.

To: House Committee on Judiciary

From: Matt Newell-Ching, Public Affairs Director, Partners for a Hunger-Free Oregon

Subject: HB 2392

Date: March 10, 2015

We all want to live in an Oregon where families can achieve their dreams. When every family has enough nutritious food to eat, a place to call home and opportunities to move forward, we'll build stronger communities in which we can all live, raise our families and enjoy.

Hunger results from family economic instability. During the Great Recession, more families facing economic instability turned to SNAP to get through hard times.

We are proud that even with increased SNAP caseloads, our state and met increased need while also improving an already high level of program integrity. Nationwide, SNAP error rates are at all-time lows, and have fallen for 7 consecutive years. As was pointed out in the *Public Assistance Program Integrity Workgroup Report (2/6/14)*, "Oregon's fraud rate [is] less than one half of one percent of the entire SNAP and TANF caseload."

Nevertheless, we welcome opportunities to make SNAP's accuracy even better. To that end, we do not object in principle the recommendation of the Workgroup to require client names be printed on Oregon Trail cards. At the same time, we want to ensure that HB 2392 does not result in unintended consequences that would adversely impact Oregonians facing economic instability. In short, we must ensure that in solving one problem, we do not create a new set of others.

To that end, we would like to offer a few constructive thoughts on HB 2392:

- Oregon's commitment to issue Oregon Trail cards quickly – often the same day that an eligible household applies for benefits - is a critical lifeline for Oregonians facing economic instability. New requirements for names on cards must not cause delays. In addition, implementation must not cause delays in the timely issuance of replacement cards.
- It is imperative that – insofar as this bill incurs a fiscal impact – funding for implementation is not taken from programs that serve Oregonians facing economic hardship. We must not “rob Peter to pay Paul.”

- Since all members of the eligible household – including teens and caretakers of seniors – are qualified to make purchases using the Oregon Trail card using the secret, 4-digit Personal Identification Number (PIN), appropriate steps must be taken by DHS to educate eligible households as well as participating merchants that printing names of eligible adults on cards does not preclude eligible minors or other members of the household from lawfully using the card to purchase food.
- It was our understanding as a participant in the Workgroup that the legislation emerging from the Workgroup’s recommendations should specify that an Oregon Trail card would have the name of *one* eligible adult in the household – not multiple names – so that it would be consistent with other forms of procurement, such as credit cards. As written, HB 2392 specifies that the names of *all* eligible adults be included on the card. This is inconsistent with our understanding of the intent of the report.
- It is our understanding that it is the intent of the authors of HB 2392 to offer tools to law enforcement in specific instances in which a reasonable suspicion of fraud exists. While we do not believe it is the intent of the authors for the printing of names on Oregon Trail cards to cause additional steps at grocery checkout lines, we must insist that measures be taken to ensure that grocers are aware that no additional steps are required, just as no additional steps are required for customers who use debit cards with a PIN.

We urge your consideration of the above concerns.