



Date: July 24, 2025

To: Chair Woolford and Members of the House Oversight Subcommittee on State and Local Public Assistance Programs

From: Monique Stanton, President and CEO, Michigan League for Public Policy

Subject: Opposition to House Bill 4515 – Bridge Card Photo and Signature Requirement

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On behalf of the Michigan League for Public Policy, I thank Chair Woolford and members of the Oversight Subcommittee on State and Local Public Assistance Programs for the opportunity to express our opposition to House Bill 4515, which would require EBT cards providing food and cash assistance benefits to include cardholders' signatures and photos. We appreciate the intent to protect the integrity of our essential public assistance programs; however, the mechanism proposed in the bill will create difficulty for the majority of people who lawfully use their benefits without having a significant impact on fraud.

The League is a nonpartisan research and advocacy organization that promotes economic opportunity for all and analyzes the impact of public policy on the lives of Michiganders who have been systemically left out of prosperity. The League is also the state's Kids Count organization, working as part of a national effort to measure the well-being of children at the state and local levels and to shape efforts that improve their lives.

It is critical that the measures Michigan adopts to prevent abuse of our safety net are driven by a clear understanding of the type of fraud occurring and the potential trade-offs involved with various solutions.

Many SNAP losses involve retailer trafficking, which the bill would not prevent. Typically, this type of fraud involves a retailer purchasing SNAP benefits from SNAP participants or benefit thieves (as described below) at a discounted rate, and seeking full reimbursement from the program for the falsely redeemed benefits. The inclusion of a photo or signature would not be effective when a retailer is an active participant in the fraud operation.

Another increasingly widespread form of SNAP fraud is the theft of benefits from families via the same skimming equipment and email phishing scams that have historically plagued standard bank-issued credit and debit cards. Bridge Cards are meant to mirror these cards,

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which do not require user photos. Instead, bank card security has been greatly improved through the integration of chip technology. Now that the federal government has authorized it, several states are working to incorporate this technology in their public assistance EBT cards; we believe Michigan lawmakers' efforts would be better aimed at making sure Michigan is positioned to do the same.

The bill would also run afoul of federal regulations that require retailers to treat SNAP participants equally to other customers<sup>1</sup> and expressly state, "Retailers must accept payment from EBT cardholders who have a valid PIN regardless of which State the card is from or whether the individual is pictured on the card."<sup>2</sup> Shoppers using all payment forms commonly engage in self-checkout or order online, where photo ID isn't required and signatures – if required at all – aren't checked by a store employee. For the bill's proposed measures to work without singling out SNAP participants, retail staff would have to check signatures and request photo ID from every shopper not paying with cash.

The House Fiscal Agency's analysis notes that the bill would result in moderate costs to the Michigan Department of Health and Human Services (MDHHS) while generating "likely negligible" savings as a result of reduced fraud.<sup>3</sup> Thus, we believe that House Bill 4515 will only further stigmatize SNAP participants – who are increasingly the *victims* of benefit theft, not the perpetrators – and make them jump through extra hoops when they are, by definition, already facing numerous barriers to food access.

We appreciate the goal of ensuring that our public assistance programs are used for their intended purposes. We stand ready to work with lawmakers, MDHHS and SNAP participants to find effective solutions that improve program integrity without making it harder for struggling families to access their most basic survival needs.

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<sup>1</sup> "Participation of retail food stores." *Code of Federal Regulations*, title 7 (2025): 1081.

<https://www.govinfo.gov/content/pkg/CFR-2025-title7-vol4/pdf/CFR-2025-title7-vol4-sec278-2.pdf>.

<sup>2</sup> "Participation of retail food stores." *Code of Federal Regulations*, title 7 (2025): 1082.

<https://www.govinfo.gov/content/pkg/CFR-2025-title7-vol4/pdf/CFR-2025-title7-vol4-sec278-2.pdf>.

<sup>3</sup> Yuille, Rick and Uchman, Cassidy. House Fiscal Agency. *Legislative Analysis of House Bill 4515 as Introduced*. 103rd Legislature, Regular sess., 2025.

<https://www.legislature.mi.gov/documents/2025-2026/billanalysis/House/pdf/2025-HLA-4515-L48DJ7TC.pdf>.

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