



August 20, 2009

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

RE: End Costly Biometrics in SNAP

Secretary Vilsack:

On behalf of our 45 member food banks across California we write to respectfully request that you use your existing legal authority to end the practice of biometrics (scanned finger print imaging) in the administration of the Supplemental Nutrition Assistance Program (SNAP).

Four of the nation's largest states (Arizona, California, New York and Texas) require eligible people to provide a finger image in order to obtain SNAP/food stamp benefits. This practice not only discourages participation, it also wastes scarce tax dollars and is ineffective at reducing fraud.

Finger Imaging is Bad Public Policy

The California state legislature has on several occasions passed legislation that ended the use of biometrics for food stamp recipients. However, on each occasion Governor Schwarzenegger has vetoed the legislation. Meanwhile, several studies have found that this technology is not cost-effective in finding fraud or deterring fraud beyond much more affordable and practical data matching services now available and being used in the state.

California: In 2003, California's auditor found that the system had serious drawbacks, including: a high number of administrative errors; low numbers of fraud detection; a potential deterrent effect on immigrant populations; and the red tape involved in going through the fingerprint imaging system. As a result of California's audit, USDA is withholding its share of funding for the state's finger imaging program. California's Legislative Analyst's Office concluded, "If we had to do it all over again, we wouldn't have finger imaging."

United States Department of Agriculture: A 1999 report by the USDA on biometric systems nationwide stated that assessing the ability of finger imaging to reduce fraud is difficult because the amount of fraud caused by duplicate participation in welfare programs is unknown.

Government Accountability Office (GAO): A May 2007 report from the GAO stated the following: "Nationwide, four states currently use finger imaging of food stamp applicants to prevent households from applying more than once for benefits. (USDA)

FNS (Food and Nutrition Service) officials commented that the agency had not concluded that finger imaging enhances program integrity and that it may have a negative effect on program access by deterring certain households from applying.”

Thus, even under the Bush Administration, USDA found no proof that finger imaging significantly reduces fraud and expressed worries that it may deter people from applying.

Finger Imaging Curtails Economic Activity, Wastes Time and Money

During one of the worst budget crises California has seen in a generation, the state continues to spend well over eight million dollars a year to collect finger images of food stamp applicants. Meanwhile, many food stamp applicants have to waste a whole day away from work – traveling to a county office, waiting hours to be seen, providing finger images, and then traveling back home – usually losing wages, just to prove they are virtuous enough to receive government assistance for which their tax dollars have already paid.

A March 2007 report from the highly respected Urban Institute described the negative impact of biometrics:

“Our results suggest that the use of biometric technology can lead to as much as a 4.3 percentage point decline in food stamp receipt. We find a significant negative relationship between the use of biometric technology and food stamp receipt for all four of our household populations. This finding is consistent with Bartlett et al. (2004) who find that biometric technology reduces the likelihood that food stamp applicants will complete the application process.”

A 4.3% decrease in food stamps benefits is significant considering that over 2 million California residents (many of whom are working families) are eligible for, but not currently receiving food stamp benefits, which means that 107,000 eligible people will not apply simply because of the finger imaging requirement. That costs the state fully \$178 million per year in federal nutrition assistance benefits. Using estimates from the USDA that each dollar in food stamp benefits generates \$1.84 in economic activity, the continued practice of finger imaging costs the state as much as \$328 million in economic activity each year.

Finger imaging gives us the worst of both worlds: it both harms participation and fails to reduce program error. As you well know, there are a number of effective ways to fight fraud other than finger imaging that are already in use – such as computer matching – which advocates fully support.

Once again, we request that you use your existing legal authority to end the practice that requires eligible people to provide finger images in order to obtain SNAP/food stamp benefits. Thank you for your thoughtful consideration of this request.

Sincerely,

Sue Sigler
Executive Director

cc: Kevin Concannon, Under Secretary for Food, Nutrition and Consumer Services
Janey Thornton, Dep. Under Secretary for Food, Nutrition and Consumer Services
Julie Paradis, Administrator, Food and Nutrition Service