November 12, 2015

Dear Members of the Joint Committee on Children, Families and Persons with Disabilities,

As a network of pediatricians, public health researchers, and children’s health and policy experts, we know that barriers to receiving SNAP (the Supplemental Nutrition Assistance Program, formerly food stamps) that increase stigma or bureaucratic obstacles can put the health of children and families at risk. Thus, we write today in support of Senate Bill 69, “An Act to eliminate photo identification on electronic benefit cards.”

An extensive body of scientific evidence, including research from Children’s HealthWatch, shows that the first years of life are a critical period of rapid brain and body growth on which future cognitive and physical development depend. This is the time when infants and toddlers form the fundamental neurological architecture of the brain (that they will have for the rest of their life. Moreover, this period sets the trajectory for their lifelong physical and mental health. Any deprivation in this sensitive period has not only measurable impacts in the short-term but can also affect a child’s future health and well-being.

To shed light on the child and maternal health impacts of not receiving SNAP due to procedural and other difficulties (“access barriers”), Children’s HealthWatch identified a subset of families in our dataset that were likely, based on their insurance status, to be eligible for SNAP but were not participating due to access barriers. Families reported non-participation due to barriers, including:

- Concerns about the application process
  - Bureaucratic obstacles in applying
  - Disrespectful treatment at the SNAP office or concern about stigma
- Administrative issues, such as reporting deadlines

We found among this subset of families that children’s nutrition and growth were harmed by barriers to accessing SNAP. Young children in families not receiving SNAP because of access barriers were more likely to be:

- Child food insecure (one of the most severe levels of food insecurity)
- Significantly underweight for their age (an indication of under nutrition)
- Living in households that were food and housing insecure
  - Both food and housing insecurity are each known risks to child health and development

Mothers in families with barriers to SNAP access were also more likely to report experiencing depressive symptoms and having had to make trade-offs between paying for medical costs and paying for other basic needs, such as rent, utilities or food.

Conversely our prior research has shown that children in families who receive SNAP are less likely to be food insecure, more likely to have a healthy weight for their age and less likely to be at risk for developmental delays. In other words, SNAP is good medicine.

SNAP is the cornerstone of the federal nutrition safety net, protecting children’s health and reducing the likelihood of food insecurity. To ensure the health of our Commonwealth’s families and children, we must continue to improve participation by eliminating barriers to accessing SNAP for eligible households. Arbitrary barriers like photos on EBT cards do not achieve their putative aim of decreasing fraud nor preventing trafficking which involves unscrupulous retailers seeking to make profits off of vulnerable households. USDA has effective tools in place to identify and address trafficking, but a photo EBT is not
one of them and is not effective. On the contrary, because of how the SNAP program is administered to
groups of individuals that share living situations and food, federal law requires states to ensure that all
those in the SNAP household can shop with the card if they have the PIN. The PIN is the security, just
like it is for all of our own debit cards.

EBT photos get in the way of other household members using the card to shop on behalf of the household
for example, as in other busy families, mothers can legally send older children and teens to a store to buy
milk and other essentials. Photos on EBT cards create and perpetuate stigma, make it difficult for family
members to support one another by sharing the responsibility for shopping, and keep eligible people,
including young children, from receiving the nutritional support that could make this Commonwealth a
healthier place for all. Simply put, eliminating photo identification on electronic benefit cards in
Massachusetts would help bolster our children’s health, while saving the Commonwealth literally
millions of dollars.

Leveraging the perspective of pediatricians and public health scientists, our research demonstrates the
need to improve children’s opportunities for healthy, successful lives through wise public policy and
practice. Based on our knowledge and expertise as pediatricians and public health researchers, we urge
you to report this bill favorably out of committee. Thank you for your time.

Sincerely,

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