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July 11, 2016

Ms. Sasha Gershen-Paal, Branch Chief
Certification Policy Branch, Program Development Division,
Supplemental Nutrition Assistance Program
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 812
Alexandria, VA 22302

Re: Federal Register Notice/Proposed Rule: Supplement Nutrition Assistance Program (SNAP): Disaster Supplement Nutrition Assistance Program (D-SNAP)

Dear Ms. Gershen-Paal,

The Electronic Funds Transfer Association (EFTA), on behalf of its eGovernment Payments Council (eGPC), is submitting the following comments in response to the above-captioned Notice published May 10, 2016 in the Federal Register.

EFTA is a non-profit, professional association that through education and outreach promotes the adoption of electronic payments and commerce. EFTA was an early and strong proponent of using electronic benefits technology for SNAP and other government programs.

The eGPC is an EFTA working group that focuses on the business, policy and operating issues involved in government electronic payment programs. eGPC members include financial institutions, state government agencies, EBT processors, ATM networks, non-profit advocates, equipment and card manufacturers, and technology companies. These members support EBT Programs and work with other stakeholders to help ensure effective and efficient delivery of EBT services, including SNAP and D-SNAP programs.

EFTA and its eGPC members are committed to the long-term success of EBT. We have worked closely with FNS and States to deliver SNAP benefits not only under normal conditions but also when disaster strikes. We remain committed to serving FNS, States and the client they serve in the provision of temporary food assistance for households affected by a disaster.

We applaud FNS for its efforts to amend SNAP regulations, codifying the procedures for planning, requesting, and operating a D-SNAP Program that reflects past guidance and builds on the success of the current D-SNAP Program. We greatly appreciate the opportunity to provide comments on the D-SNAP Proposed Rule and offer the following:

Replacing EBT Cards

The Department is proposing that when SNAP households lose their EBT cards in a disaster, the EBT disaster system design include procedures for providing current certified SNAP cases with replacement cards "as soon as possible, but within the card replacement timeframes required at 7 CFR 274.6(b)".

In response to the Department's interest in receiving comments on whether or not a more specific and stricter card replacement timeframe should be implemented for D-SNAP situations, we support the Department's decision to not require a more specific or stringent timeframe in order to provide States and their EBT processors flexibility when needed as dictated by the individual disaster circumstances within a

particular State. We believe that requiring States and their EBT processors to make reasonable efforts to replace EBT cards as soon as possible, but within the timeframes required by at 7 CFR 274.5.(b), is a reasonable and attainable requirement that will help ensure clients receive their replacement cards as soon as possible.

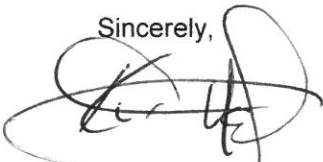
Deductible Disaster-Related Expenses

As an association that promotes the use of electronic payments, EFTA strongly supports the Department's proposed change to allow deductions for expenses that were paid by credit card as opposed to cash or a check. By changing the current policy to allow deductions for expenses that are incurred during the disaster benefit period, even if those expenses will be paid at a later date because a credit card was used, provides for a more equitable policy and better reflect how households currently pay for goods and services. However, in reading the Proposed Rule it is unclear if the use of a debit card would be considered the same as a cash payment as funds in a checking or savings account would be used. If not, we recommend the Department considering adding a provision for debit cards.

In summary, EFTA would like to compliment FNS on developing a very thorough and clearly defined set of Proposed Rules for the planning, implementing and operating of the D-SNAP program.

Thank you for your consideration of our comments. If we have any follow-up questions please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kurt Helwig', written over a white background.

Kurt Helwig
President & CEO