

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
Washington, D.C. 20503-0001

LRM NO: 4777

FILE NO: 1486

6/17/96

LEGISLATIVE REFERRAL MEMORANDUM

Total Page(s): 5

TO: Legislative Liaison Officer - See Distribution below:

FROM: James JUKES

(for) Assistant Director for Legislative Reference

OMB CONTACT: Ronald JONES 395-3386 Legislative Assistant's Line: 395-3454
C=US, A=TELEMAIL, P=GOV+EOP, O=OMB, OU1=LRD, S=JONES, G=RONALD, I=E
jones_re@a1.eop.gov

SUBJECT: Office of Management and Budget Proposed Testimony on POSSIBLE IMPACT OF
REGULATION E ON ELECTRONIC FUNDS TRANSFER ACT

~~WR~~
WR-EBT

DEADLINE: 3:00 pm Tuesday, June 18, 1996

In accordance with OMB Circular A-19, OMB requests the views of your agency on the above subject before advising on its relationship to the program of the President.

Please advise us if this item will affect direct spending or receipts for purposes of the "Pay-As-You-Go" provisions of Title XIII of the Omnibus Budget Reconciliation Act of 1990.

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**RESPONSE TO
LEGISLATIVE REFERRAL
MEMORANDUM**

LRM NO: 4777
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SUBJECT: Office of Management and Budget Proposed Testimony on POSSIBLE IMPACT OF REGULATION E ON ELECTRONIC FUNDS TRANSFER ACT

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- _____ No Objection
- _____ No Comment
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******* DRAFT *******

STATEMENT OF

G. EDWARD DESEVE

CONTROLLER

OFFICE OF MANAGEMENT AND BUDGET

OFFICE OF FEDERAL FINANCIAL MANAGEMENT

BEFORE THE

SUBCOMMITTEE ON FINANCIAL INSTITUTIONS

AND CONSUMER CREDIT OF THE

COMMITTEE ON BANKING AND FINANCIAL SERVICES

UNITED STATES HOUSE OF REPRESENTATIVES

**REGARDING THE POSSIBLE IMPACT OF APPLYING THE
FEDERAL RESERVE'S REGULATION E UNDER THE
ELECTRONIC FUNDS TRANSFER ACT TO BENEFIT PROGRAMS**

JUNE 19, 1996

***** DRAFT *****

Statement of G. Edward DeSeve

Controller

**Office of Management and Budget
Office of Federal Financial Management**

**Before the Subcommittee on Financial Institutions and Consumer Credit
of the Committee on Banking and Financial Services**

**Regarding the Possible Impact of Applying the Federal Reserve's Regulation E
under the Electronic Funds Transfer Act To Benefit Programs**

INTRODUCTION

Thank you Madam Chairwoman. As Controller of the Office of Federal Financial Management in the Office of Management and Budget (OMB), I work on Electronic Benefits Transfer (EBT) with other offices in OMB and with program and financial management officials in the Departments of Agriculture, Health and Human Services, and the Treasury, as well as the Social Security Administration. The Administration appreciates the opportunity to testify before you today on the impact of applying the Electronic Funds Transfer Act, and its implementing regulation, Regulation E, to benefit programs operating EBT systems. Our goal is to build a nationwide EBT systems by 1999 that uses one card, is user friendly, and provides recipients with dignity, security, and access. We propose to do this by promoting individual responsibility to minimize fraud and abuse in EBT systems.

CUSTOMIZING CURRENT LEGISLATION

Recently, I testified before the Committee on implementing a single-card EBT system, partnering with States and using the commercial infrastructure. EBT is a payment method similar to Direct Deposit except that it serves those recipients who

receive in-kind benefits, cannot afford commercial banking, or otherwise do not have bank accounts. However, due to the unique characteristics of EBT systems and the populations they serve, existing consumer protection legislation does not adequately meet the needs of participants in EBT systems, nor does it provide States the needed authority to prevent fraudulent claims. Still, many provisions of current law and regulation provide valuable consumer rights to all bank customers and should be applied to EBT systems.

As such, we would propose that existing consumer protection legislation can be customized for those EBT accounts that are not owned by the recipient, to strengthen the relationship between the State and the benefit recipient. For EBT accounts in Federally-administered EBT programs, where an account is in fact owned by the benefit recipient, existing legislation is adequate.

WHY CHANGE IS NEEDED

The current provision of law for unauthorized funds transfers is not adequate for EBT accounts owned by States for three reasons: (1) States are concerned about unlimited liability arising from repeated losses, fraudulent or otherwise, in accounts that they cannot close, (2) if there is a problem of unauthorized withdrawals from the EBT account, the State currently is obligated to reimburse and continue its relationship with the recipient, and (3) recipients of means-tested programs generally cannot afford the \$50 co-insurance payment provided for under current law. The Federal Reserve Board recognized these concerns when it established a moratorium on the application of Regulation E to EBT systems until March, 1997.

Under current law, a financial institution has the discretion to determine to which consumers it wants to offer electronic funds transfer services. If there is a problem of

unauthorized withdrawals with a commercial account, a financial institution may simply no longer offer electronic funds transfer services to a given consumer.

If there is a problem with an State EBT account, the State must continue its relationship with the recipient. Without a backup paper system, this means recipients of in-kind benefits, such as food and nutrition assistance, will continue to participate in EBT. In these State-administered programs, a monthly fee is paid for by the State pays for the account. While the State owns the account, the recipient is responsible for safeguarding the card and PIN. States are concerned that current legislation does not provide recipients with sufficient incentive to prevent losses. As a result, States fear they will be stuck paying monthly fees that are higher than necessary.

ACTION FORCING MECHANISM

Many States have organized in regional alliances to implement EBT, such as the Southern Alliance of States, the Northeast Coalition of States, and the Western Coalition of States. I have attached to my testimony a list of the EBT alliances and their member States. States in the three coalitions I have mentioned are scheduled to begin rolling-out their EBT systems next March, provided, that there is a solution to the problem of consumer protections. The alliances are concerned about proceeding given the impending end of the moratorium.

COMMON GROUND

To address these concerns, we have been working closely with States in these alliances and with consumer groups to find common ground that encompasses those rights that should be applied to EBT while addressing those factors that make State-owned EBT accounts different from consumer owned accounts. We believe that many

States and consumer groups can agree on the common ground of the following four principles:

1. A Responsibility Standard;
2. Addressing Recipients Needs;
3. Administrative Controls to Prevent Losses; and
4. Shared Federal and State Financing.

First--a responsibility standard. To avoid the potential for unlimited liability, in general, the recipient should be liable for unauthorized transactions involving a valid access device, or EBT card, and PIN. The recipient should not, however be responsible for those losses that occur after the recipient has reported the EBT card is missing, the PIN compromised, or that continued access is denied to a person previously authorized to use the EBT card. The responsibility standard should not apply in cases of forced initiation, that is, when force is used prior or incident to the withdrawal, *if* the recipient is willing to cooperate in the prosecution of the person who used the EBT card. In such, case, the recipient should be reimbursed in full. The responsibility standard should not apply in cases where a valid access device and PIN were not used, such as systems errors.

Second--To accommodate the responsibility standard and the unique recipient population, EBT systems should be designed to respond to recipient needs that current law does not require financial institutions to address. EBT systems should include a toll-free hotline, easily accessible 24 hours a day and 7 days a week for recipients to call and request that account access from their access devices be blocked. States should provide recipients with adequate notice, and training as needed on-demand, of how the system works. States should also allow PIN selection on-demand to discourage recipients from

writing down the PIN on or near the access device. States should conduct an investigation before denying any claim. And claim denials should be subject to fair hearing review, at the request of the recipient, to ensure proper procedures were followed in the investigation and determination.

Third--Administrative cost controls to prevent unauthorized funds transfers and claims. Based on a State's experience with a given recipient, the State, or its agent, may want to provide a recipient with an alternative method of accessing benefits. As an incentive to safeguard access devices and PINs, a State may want to impose a fee on replacement cards that reflects the reasonable cost of producing and distributing the card.

And finally--Shared Federal and State government financing of the cost of providing these consumer protections for State-administered Federal programs. Almost all of the costs associated with providing these consumer protections are considered administrative costs for the purposes of Federal reimbursement, generally at 50 cents on the dollar. The remaining costs involve replacing benefit losses only as described above, such as in some cases of systems error or when the withdrawal was initiated through force.

The Federal government should participate in funding these replacement because the electronic EBT environment is much more secure than the paper environment. In paper benefit delivery systems there is a negotiable instrument, such as a check or food coupon, which can be lost or stolen after it is in the recipient's possession. EBT is like a vault with two keys: the card and PIN. Because the card and the PIN must be used together to withdrawal funds, many losses that could have occurred in the paper environment, after the recipient is in possession of the funds, are *prevented* with EBT. In

general, the government will only be liable for EBT losses that are not the fault of the client. This includes new situations, not the fault of the client, but for which there is no analogue in the paper environment, such as forced initiation of a withdrawal.

CONCLUSION

States and recipient advocates have expressed concerns that current law is not sufficient to protect States and recipients from potential liability in EBT systems. We believe that customizing current legislation to reflect four principles will address the needs of both States and recipients alike. These principles are:

- a responsibility standard;
- Addressing recipients needs;
- administrative controls to prevent losses; and
- shared financing.

We believe that adopting a customized approach, based on these four principles is far preferable to a complete exemption from Regulation E. The customized approach gets EBT done and advances our partnership with States, particularly in the area of financing. The customized approach minimizes the potential for fraud and abuse. The customized approach basically eliminates State liability when the card and PIN were used. And the customized approach encompasses many basic consumer standards that all consumers enjoy today. A complete exemption leaves these issues unresolved and in fact only adds new issues as each State must now create consumer protections *de novo*.

We hope that many of the States and advocates testifying today will repeat this message and provide more description of this common ground. We are available to work with Committee staff in developing bill language that includes the principles we have articulated. Again, thank you for this opportunity to testify before you on EBT.

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SUBJECT: AGRICULTURE Proposed Testimony on POSSIBLE IMPACT OF REGULATION E ON
ELECTRONIC FUNDS TRANSFER ACT

DEADLINE: 5:00 TODAY Tuesday, June 18,1996

*WR - Electronic
Benefits
Transfer*

In accordance with OMB Circular A-19, OMB requests the views of your agency on the above subject before
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"Pay-As-You-Go" provisions of Title XIII of the Omnibus Budget Reconciliation Act of 1990.

COMMENTS: OMB testimony for this hearing was previously circulated under LRM 4777.

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EOP:

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**RESPONSE TO
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DRAFT

TESTIMONY OF ELLEN HAAS
UNDER SECRETARY FOR FOOD, NUTRITION AND CONSUMER SERVICES
U.S. DEPARTMENT OF AGRICULTURE
BEFORE THE
HOUSE COMMITTEE ON BANKING AND FINANCIAL SERVICES
SUBCOMMITTEE ON FINANCIAL INSTITUTIONS AND CONSUMER CREDIT
JUNE 19, 1996

Madame Chairman, Members of the Committee, it is my pleasure to join you today to discuss the impact of applying the Federal Reserve's Regulation E under the Electronic Funds Transfer Act to the Food Stamp Program.

Vice President Gore, the Federal Electronic Benefits (EBT) Task Force and I as co-Chair of the Task Force and as Under Secretary for Food, Nutrition and Consumer Services at the U.S. Department of Agriculture, have championed the use of electronic benefit technology to deliver benefits to people. The Administration has recognized the challenges involved in implementing this technology; challenges that include ensuring that people using the technology have adequate protections for their benefits. Regulation E is an important issue affecting the implementation of EBT and all of the stakeholders involved.

The Food and Consumer Service of the U.S. Department of Agriculture has been testing EBT for food stamp issuance since 1984. In the last three years, we have been actively working with States on implementing EBT nationwide.

The Administration recognized early on EBT's extraordinary potential for efficiently, affordably, and securely delivering program benefits and improving the quality of service to food stamp recipients and reducing the stigma associated with paper coupons. And, we knew that issuing food assistance benefits electronically would revolutionize the way we protect benefits from fraud and abuse.

Vice President Gore's September 1993 Report of the National Performance Review, **From Red Tape to Results**, called for the rapid development of a nationwide system to deliver government benefits electronically. The Federal EBT Task Force was chartered to meet that purpose. Just over two years ago, the Task Force report, **From Paper to Electronics: Creating a Benefit Delivery System That Works Better and Costs Less**, was released.

Since then, we have made tremendous strides in realizing the vision of that report: to make EBT nationwide in the fullest sense - one card, user friendly, with unified electronic delivery of government funded benefits under a federal-state partnership. Our progress is noteworthy, thanks to the cooperation of the Federal agencies and the Federal EBT Task Force in working with our State partners.

Today, every state in the country, as well as the Commonwealth of Puerto Rico, is planning for EBT implementation. Thirty of these States have received approval to proceed with their EBT programs. The Southern Alliance of States, under the guidance of the Federal EBT Task Force, is

prepared to begin implementation of combined Federal and State EBT by the end of the year.

I am particularly proud of the role of the Food and Consumer Service as the lead Federal agency for EBT. The Food Stamp Program has progressed from having just six operational EBT sites in 1993, to thirteen sites today. Five States now operate statewide EBT systems: Maryland, New Mexico, Texas, South Carolina and Utah. Overall, EBT participation has increased from roughly four percent of the total Food Stamp caseload in 1993 to almost fifteen percent today.

This Administration is fully committed to seeing the promise of EBT become a reality in every State. Over the past three years we have made EBT a top priority for the Department. We have met our Department goal of having every State planning EBT by the end of the year.

Since States began planning for EBT, there has been concern about the impact of Regulation E on EBT systems. Regulation E establishes a framework of legal rights and responsibilities for card issuers and card holders in electronic fund transfer systems, setting up procedures for processing claims of lost funds and limiting a client's liability for loss. Without Reg E, clients are currently liable for all benefit losses resulting from transactions made with a valid card and Personal Identification Number (PIN) up to the point the client notifies the EBT system of a problem.

In March, 1994, the Federal Reserve Board issued a decision to extend coverage of Regulation E to EBT systems effective in March, 1997. The Board allowed three years for State and Federal agencies to determine the impact Reg E would have on EBT operating costs, and to determine, should there be increased costs, whether these would preclude EBT from being a cost-effective alternative to issuing paper checks and food stamp coupons. Most stakeholders agreed that there was not enough empirical data in this area to project the impact Reg E would have on EBT.

Administrators for State-operated Federal programs like the Food Stamp Program and Aid to Families with Dependent Children expressed concern that Reg E might lead to an influx of claims of unauthorized transactions, and in turn to increased costs due to replaced benefits. It was important for us to collect empirical data to discern if these concerns would be borne out in practice.

At the same time, we heard from advocates who believed that recipient abuse would be minimal, but were concerned that recipients have the same protections as commercial debit card customers.

In an effort to learn more about the likely impacts of Reg E on benefit replacements and administrative costs, the Food and Consumer Service, in collaboration with the Departments of Health and Human Services and the Treasury, sponsored several demonstrations.

I would like to personally thank New Jersey, New Mexico, and

Citibank's Direct Federal Program operation in Texas -- for volunteering to participate in our 12 month evaluation of Reg E. These States, their participating counties, and the Texas project, have greatly advanced our understanding of this important issue.

I am pleased to report that the Food and Consumer Service has completed gathering data on how the application of Regulation E will affect EBT systems, and although we have not completed our analysis of the full 12 months of demonstration operations, I would like to present our preliminary findings this morning.

In our evaluation, we took a careful look at recipient claims in EBT systems operating with and without Regulation E to examine the impact on recipients and program administrative and benefit costs.

Our preliminary data show Reg E had little, if any, impact on the rate of claims submissions. This is the case across the three major categories of claim types, including unauthorized transactions, the very different demonstration settings, and all programs.

Consequently, our preliminary findings suggest that Reg E had little to no effect on the cost associated with replaced benefits in the demonstration sites. Most claims for benefits lost through the unauthorized use of EBT were denied. For approved claims, the resulting liability for replaced benefits averaged just \$0.02 per case month for cash benefits and less than \$0.01 per case month for food stamp benefits in the

demonstration sites.

At this point, the preliminary evidence suggests that, although Regulation E may not impose much additional cost to governmental agencies and their EBT vendors in the form of replaced benefits, the added administrative costs of Reg E operations may be more substantial. Our evaluation found that administrative costs varied considerably across sites and programs -- with differences in claim rates and claim types.

For direct Federal payment programs, such as the one we studied in Texas, the administrative costs of Reg E equalled \$0.19 per case month, compared to costs of from \$0.64 to \$0.94 per case month for claims of lost cash benefits in state-administered Federal programs.

For claims involving food stamp benefits, which were fewer in number and did not involve automatic teller machine (ATM) "misdispenses," the administrative costs of Reg E operations showed little variation around an average of \$0.26 per case month.

In contrast, the administrative costs of investigating claims in the comparison site, which did not implement Reg E, averaged only about \$0.02 per case month for AFDC claims and \$0.01 per case month for food stamp claims.

Later this year, when our final report is available, we may see a somewhat different picture of the demonstration sites' experience with

claims and administrative costs. The final report will be based on data from the full 12 months of Reg E operations at each site and will include some administrative cost components not yet compiled, such as caseworker time, and costs associated with fair hearings and recoupment procedures.

The final report will also assess costs that likely would not be incurred in a non-demonstration setting, as well as estimate the likely impact of Reg E on the cost-neutrality of EBT.

Of special interest will be the sites' own assessment of how staffing and operational procedures can be modified to achieve even greater efficiencies in providing the client protections envisioned by the Federal Reserve's Board of Governors when the Board ruled that Regulation E should apply to all EBT systems.

Madame Chairman, this concludes my prepared remarks. I would be happy to answer any questions you or the Members might have.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

~~XC Bruce Keed~~
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WR-EBT
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MEMORANDUM FOR THE FIRST LADY

THROUGH: Carol Rasco
Leon Panetta

FROM: Isabel Sawhill

SUBJECT: Electronic Benefits Transfer (EBT)

The purpose of this memorandum is to review our current efforts to implement Electronic Benefits Transfer (EBT) as a major method of delivering Federal and State aid to individuals.

Current Policy

The National Performance Review (NPR) recommended "the rapid development of EBT." As currently envisioned, EBT will give each eligible Food Stamp program beneficiary and each "unbanked" beneficiary of cash assistance a plastic card which can be used in grocery store checkouts (point-of-sale) and at automatic teller machines.

The objectives of EBT are to improve the delivery of services and reduce the costs of benefit delivery by applying modern electronic banking technology to outmoded government disbursing. EBT can eliminate massive amounts of paper, particularly paper checks and food stamp coupons. The current system is expensive and inefficient because of the many, diverse programs for low-income persons that separately cut, print, deliver, and reconcile paper checks and paper coupons. For benefit recipients, there can be long waits for the check to arrive, check cashing fees, and a high risk of theft.

EBT Task Force

On November 5, a Federal EBT Task Force charter was approved by senior policy officers of USDA, HHS, Treasury, Education, and OMB. The Task Force, originally chaired by Phil Lader, is now chaired by me, and includes, as co-chairs, Ellen Haas, Assistant Secretary for Food and Consumer Services at USDA and Ken Apfel, Assistant Secretary for Management and Budget at HHS. We have established an interagency EBT Executive Staff and budget to implement the NPR recommendations. Our goal is to develop a report to be presented to the Vice President in March. The report will include a plan for nationwide implementation of EBT - "one card, user friendly, and nationwide." In order to accomplish these objectives, we will need to work closely with States and with the private sector, especially financial institutions and retailers.

Background and Strategy

The introduction of Electronic Funds Transfer (EFT) in the early 1970's revolutionized payment to individuals -- e.g. 84 percent of federal salaries are now paid through EFT and over 50 percent of Federal benefit payments are paid through EFT for individuals who are "banked." Still, many beneficiaries are "unbanked" because they cannot afford or cannot handle a regular banking relationship. Historically, these individual have received checks and paid fees (often 2 to 5 percent of face value) to cash them. Roughly 80 percent of welfare program beneficiaries do not have bank accounts.

For individuals who are banked, the current system of direct deposit through EFT would become the presumed method of payment. For individuals who are unbanked, using the experience gained in Federal/State pilot EBT programs in Reading (PA), Ramsey County (MN), Albuquerque (NM), and the State of Maryland, a regional phase-in is under development that would begin in 1995-1996 and be completed in 1999. State-administered benefit programs and Federal programs that may initially be included on one card include:

FEDERAL AND STATE BENEFITS THAT COULD BE CONVERTED TO EBT: ADMINISTERING AGENCY AND UNBANKED BENEFIT DOLLARS			
Agency	Programs	% Unbanked Benefits	1992 Benefits (\$ in billions)
USDA	Food Stamp Program *	100%	20.9
HHS/States	Aid to Families with Dependent Children	75%	18.5
HHS	Supplemental Security Income	50%	11.4
HHS	Social Security Benefits	14%	35.2
HHS	Child Support	17%	1.0
States	General Assistance	75%	4.5
RRB	Railroad Retirement	17%	1.3
VA	Veterans Benefits	17%	2.1
States	Refugee Assistance	75%	0.3
States	Low Income Energy Assistance	75%	1.1
OPM	Federal Pensions	17%	5.5
Defense	Military Pensions	17%	3.8
Total Unbanked Benefits			105.6

* Food Stamp Program dollars are listed as "unbanked," since benefits are for food, rather than cash, and thus would be included on the card.

Other established programs such as Women and Infant Children (WIC), Unemployment Insurance, and Black Lung could be included in a second phase. Programs that are under development such as the Earned Income Tax Credit (EITC) or Health Care Reform could be included when and as appropriate. After discussions with your

Health Care Reform Task Force, our view is that EBT could serve as an implementation model for the Security Card.

David Ellwood, HHS' Assistant Secretary for Planning and Evaluation, believes that EBT provides a vehicle for combining Food Stamps and EITC on a single card for the working poor. Beyond this, the EBT card encourages us to consider issues such as whether filing units (family vs. individuals) can be standardized, whether diverse eligibility standards should be made more uniform, and whether additional programs serving low-income families can be combined.

Issues for Resolution

We have a long way to go by the year 1999. Only 2 percent of food stamp households nationwide are on EBT. The concept of EBT is strongly supported by all the key stakeholders: the Federal agencies (especially Secretary Espy), recipients, State public assistance agencies, grocers, and banks. Over 30 States, excluding the 5 states that have operational EBT, are actively participating in EBT planning efforts. However, without coherent Federal leadership in setting goals, acting as a catalyst, and building cost-effective models, EBT will fail to meet its objectives. Moreover, each group of stakeholders has a differing perspective, particularly on how to coordinate and pay for nationwide EBT. Among the key issues are the following:

How do we limit Federal cost and make EBT cost-effective for all the stakeholders?

We will be working with one or more regions and the private sector to build a prototype that is cost-effective. A large scale, multi-state prototype using one card for delivery of both Federal and State benefits is a key intermediate step to nationwide roll out. Although we have promising cost data from the current pilots, extrapolating these analyses to a nationwide rollout is difficult given the large number of cost variables and many players. Preliminary estimates show a range from 1994-1999 of net Federal savings of over \$1 billion to net Federal costs of over \$1.6 billion. The range is so large because the estimates are highly dependent on the extent to which costs are controlled and shared among key stakeholders, including Federal and State governments, retailers, financial institutions, and recipients. A large scale prototype will be critical for determining cost requirements, developing interagency and interstate coordination, and obtaining private sector support.

How do we ensure that Federal agencies work together effectively, in partnership with States and with the retailers and banks?

The report to the Vice-President should be more than a blueprint for nationwide EBT. It should also be a document to mobilize

support of the stakeholders. We plan to include in the report a recommendation to establish a Federal Advisory Committee with membership of States, retailers, banking and financial services, and consumer groups.

Should we use EBT as a tool to re-engineer, streamline, and simplify the current benefit program structure?

Program simplification and streamlining are expected results of EBT. At a minimum, food stamp coupons would be eliminated and multiple Federal and State benefits (AFDC, Food Stamps, Child Support Enforcement Payments, State General Assistance) would be available on one EBT card for all recipients. The larger policy question is whether EBT should become an agent for substantive program changes such as standardizing benefit eligibility.

Additional Information

If you would like to see how the program works, the Maryland program is a good model and the staff who implemented that program are available to brief you. Congressional staff working for Senator Leahy (who is sponsoring an EBT bill) and Senator Kennedy (who sponsored a favorable report by the Office of Technology Assessment) have visited the Maryland program and are quite impressed with how well the program was implemented and how it works.

c: Vice President
Secretary Shalala
Ellen Haas
Ken Apfel
Mary Jo Bane
Alice Rivlin
Phil Lader
Elaine Kamarck

Secretary Espy
David Ellwood
Frank Newman
Chris Edley
Sally Katzen
Kathi Way