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Electronic Benefit Transfer Photo Requirement Exemptions Report

August 2024



Massachusetts Department of Transitional Assistance

**DEPARTMENT OF TRANSITIONAL ASSISTANCE
ELECTRONIC BENEFIT TRANSFER
PHOTO REQUIREMENT EXEMPTIONS REPORT**
AUGUST 2024

REPORT OVERVIEW

Massachusetts General Law, Chapter 18, Section 2 (B)(s) requires DTA to file an annual report detailing the numbers of recipients exempt from the Electronic Benefit Transfer (EBT) card photo requirement and the reasons for such exemptions.

DEPARTMENT OF TRANSITIONAL ASSISTANCE MISSION

The Department of Transitional Assistance's mission is to assist and empower low-income individuals and families to meet their basic needs, improve their quality of life, and achieve long-term economic self-sufficiency. DTA offers a comprehensive system of programs and supports to help individuals and families achieve greater economic mobility, including food and nutritional assistance, economic assistance, and employment supports. Currently, DTA serves one out of every six people in the Commonwealth including working families, children, elders, and people with disabilities.

EBT PHOTO REQUIREMENT

In August 2013, the Legislature passed a law requiring the use of photo identification on the front of each newly issued, and reissued, EBT card. The requirement covered recipients who are 18 or older that are designated to be the "head of household" on a DTA assistance case. Other classes of recipients are exempted from the requirement as follows:

- 60 years of age or over
- Disabled
- Blind
- Victims of domestic violence

DTA must also comply with federal laws. The United States Department of Agriculture Food and Nutrition Service (USDA-FNS) requires that heads of households who do not receive Supplemental Nutrition Assistance Program (SNAP) benefits on their own behalf be exempted (e.g., some relative caretakers of minor children). In addition, exemptions based on religious beliefs also must be allowed.

EBT PHOTO EXEMPTIONS BY PROGRAM

The following table, compiled as of March 30, 2024, details the number of current program participants who have been exempted from the photo requirement.

Exemption	SNAP	TAFDC	EAEDC
Younger than 19	983	151	25
Older than 59	223,003	1,597	12,070
Domestic Violence	15,763	6,995	632
Disabled	272,169	6,929	19,137
Religious Exemption	62	<11	<11
Homeless	62,876	5,739	4,140
Non-Applicant	4,647	171	66

For client privacy, demographic data under 11 is suppressed.

Commented [P(1)]: These numbers, especially older than 59, disabled, and homeless seem really high.

I think we should explain that clients could be included in multiple categories or else people are going to think both our caseload is massive and everyone is exempt.