



January 12, 2018

Senate Committee on Public Benefits, Licensing, and State-Federal Relations
Senator Kapenga, Chair
State Capitol, Room 15 South
Madison, WI 53707

Dear Senator Kapenga and members of the committee:

Thank you for the opportunity to provide comment on SB 624. The Wisconsin Board for People with Developmental Disabilities' (BPDD) analysis of this bill concludes that people with disabilities would be disproportionately harmed. We oppose SB 624.

Many people with disabilities in Medicaid programs are also FoodShare recipients¹. 25% of FoodShare recipients are elderly, blind, or disabled.

Adding a Photo ID requirement for recipients of FoodShare cards will result in confusion and perhaps denial of sales to people who are legally purchasing food on behalf of FoodShare recipients with disabilities.

Many people with disabilities do not have driver's licenses or photo ID photos on file with DOT, which will require people either to obtain a photo ID or need a photo taken for an EBT card in order to receive food benefits. The DHS fiscal estimates that 60% of current FoodShare recipients would need to have a photo added to their EBT card.

Lack of reliable transportation options is a real barrier for many people with disabilities; a recent BPDD survey found that 75% of people with disabilities said limited access to transportation impacted their ability to get to where they need to go in the community. Requiring a population that have few or no transportation options and limited funds to pay for transportation to physically get to a DMV or welfare office will discourage low-income people with disabilities from accessing assistance to purchase food.

Federal law requires that a FoodShare household has the right to designate a trusted relative, friend or social agency to food shop for them. All members of the household are legally able to use a FoodShare card, whether or not their ID is on the card, and non-household members authorized^[2] by the card holder to use the card may do so on their behalf. Many people with disabilities have staff, family members, neighbors, or others in their

¹ People with physical, intellectual/developmental, and mental health disabilities often are participants in Wisconsin's Elderly Blind and Disabled Medicaid health insurance (BadgerCare, SeniorCare) or long-term care (Family Care, Family Care Partnership, and IRIS) programs. Income at or below 100% of the Federal Poverty Level (\$11,770 annual income for an individual) and an asset limit of \$2000 is threshold for eligibility for Medicaid these programs; 100% FPL is also the income threshold to qualify for FoodShare.

^[2] Permission from the card holder is considered authorization.

support network that purchase food for them. A Photo ID picture of one individual does not reflect the entire household or a designee who can use the card.

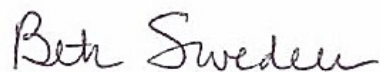
This bill does not include any exemptions to the Photo ID requirement or provisions to include additional photos or other verification that the person using the FoodShare card has been authorized by the recipient to do so.

In addition to the tremendous administrative costs to the state to implement a Photo ID (estimated one-time costs at \$7.6 M and ongoing costs at \$1.6 M), BPDD cautions that any changes to requirements and administrative process will cause participant confusion, especially among populations who may be non-readers, non-verbal, use adaptive or responsive technology (including touchpads), have large print needs, may not have access to the internet, etc. Participant confusion will lead to loss of access to food. BPDD suggests that DHS's fiscal estimate on outreach to FoodShare clients will be insufficient to meet the communication needs for the Intellectual/Developmental Disability population.

BPDD is charged under the federal Developmental Disabilities Assistance and Bill of Rights Act with advocacy, capacity building, and systems change to improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with developmental disabilities.

Our role is to seek continuous improvement across all systems—education, transportation, health care, employment, etc.—that touch the lives of people with disabilities. Our work requires us to have a long-term vision of public policy that not only sees current systems as they are, but how these systems could be made better for current and future generations of people with disabilities.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Beth Swedeen".

Beth Swedeen, Executive Director
Wisconsin Board for People with Developmental Disabilities