



Office of the Secretary
Washington, DC 20250

November 26, 2024

THE HONORABLE JOHN BOOZMAN
Ranking Member
Committee on Agriculture, Nutrition, and Forestry
United States Senate
328A Russell Senate Office Building
Washington, DC 20510

Dear Ranking Member Boozman:

This letter and the enclosure respond to the Congressional directive contained in Division HH, Title IV, Section 501 of the Consolidated Appropriations Act, 2023 (Public Law 117-328), as amended by Division B, Title I, Section 105 of the Continuing Appropriations and Extensions Act, 2025 (Public Law 118-83), which directed the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to submit to the Committee on Agriculture, Nutrition, and Forestry of the Senate and the Committee on Agriculture of the House of Representatives a report on Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer (EBT) theft prevention.

As outlined in statute, the enclosed report contains the following:

- Information on SNAP EBT theft, including a description of standard reporting methods for States to collect and share data with USDA on the frequency and location of SNAP electronic benefit theft;
- Comparisons of replacement of stolen SNAP benefit policies across States;
- A summary of FNS efforts to coordinate with State agencies, the Administration for Children and Families of the U.S. Department of Health and Human Services relative to the Temporary Assistance for Needy Families (TANF) program, Federal law enforcement agencies, retail food stores and retail associations, and EBT industry groups on benefit theft prevention;
- Steps FNS has taken to date to incorporate industry standards into its SNAP EBT theft prevention efforts;
- Recommendations for preventing and detecting SNAP EBT theft;
- A comparison of State plans related to reimbursement, prevention, and other relevant procedures.

USDA appreciates the continued interest of its authorizing committees in preventing SNAP EBT theft and replacing benefits of SNAP households who are victimized by such theft. FNS is

THE HONORABLE JOHN BOOZMAN

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pleased to report to Congress on its multi-pronged, ongoing efforts in collaboration with States and outside partners to prevent EBT theft from undermining the food security of vulnerable individuals and families across the country. USDA appreciates the recent temporary extension by Congress of statutory authority for States to continue replacing stolen SNAP benefits using Federal funds through established validation processes.

We are tracking this extended authority is now scheduled to expire on December 20, 2024, coinciding with the expiration of the current Continuing Resolution for Fiscal Year 2025 appropriations. We are hopeful the enclosed report will aid the committees in their consideration of further extending this authority.

We look forward to continued work with you on this important matter. If you have any questions about the enclosed report, please have a member of your staff contact the USDA Office of Congressional Relations at (202) 720-7095. A similar letter and the enclosed report are being sent to your colleagues.

Sincerely,

/s/Thomas J. Vilsack

THOMAS J. VILSACK
Secretary

Enclosure



Office of the Secretary
Washington, DC 20250

November 26, 2024

THE HONORABLE DAVID SCOTT
Ranking Member
House Committee on Agriculture
U.S. House of Representatives
1010 Longworth House Office Building
Washington, DC 20515

Dear Ranking Member Scott:

This letter and the enclosure respond to the Congressional directive contained in Division HH, Title IV, Section 501 of the Consolidated Appropriations Act, 2023 (Public Law 117-328), as amended by Division B, Title I, Section 105 of the Continuing Appropriations and Extensions Act, 2025 (Public Law 118-83), which directed the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to submit to the Committee on Agriculture, Nutrition, and Forestry of the Senate and the Committee on Agriculture of the House of Representatives a report on Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer (EBT) theft prevention.

As outlined in statute, the enclosed report contains the following:

- Information on SNAP EBT theft, including a description of standard reporting methods for States to collect and share data with USDA on the frequency and location of SNAP electronic benefit theft;
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THE HONORABLE DAVID SCOTT

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/s/Thomas J. Vilsack

THOMAS J. VILSACK
Secretary

Enclosure



Office of the Secretary
Washington, DC 20250

November 26, 2024

THE HONORABLE DEBBIE STABENOW
Chairwoman
Committee on Agriculture, Nutrition, and Forestry
United States Senate
328A Russell Senate Office Building
Washington, DC 20510

Dear Chairwoman Stabenow:

This letter and the enclosure respond to the Congressional directive contained in Division HH, Title IV, Section 501 of the Consolidated Appropriations Act, 2023 (Public Law 117-328), as amended by Division B, Title I, Section 105 of the Continuing Appropriations and Extensions Act, 2025 (Public Law 118-83), which directed the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to submit to the Committee on Agriculture, Nutrition, and Forestry of the Senate and the Committee on Agriculture of the House of Representatives a report on Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer (EBT) theft prevention.

As outlined in statute, the enclosed report contains the following:

- Information on SNAP EBT theft, including a description of standard reporting methods for States to collect and share data with USDA on the frequency and location of SNAP electronic benefit theft;
- Comparisons of replacement of stolen SNAP benefit policies across States;
- A summary of FNS efforts to coordinate with State agencies, the Administration for Children and Families of the U.S. Department of Health and Human Services relative to the Temporary Assistance for Needy Families (TANF) program, Federal law enforcement agencies, retail food stores and retail associations, and EBT industry groups on benefit theft prevention;
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THE HONORABLE DEBBIE STABENOW

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/s/Thomas J. Vilsack

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Secretary

Enclosure



Office of the Secretary
Washington, DC 20250

November 26, 2024

THE HONORABLE GLENN 'GT' THOMPSON
Chairman
Committee on Agriculture
U.S. House of Representatives
1301 Longworth House Office Building
Washington, DC 20515

Dear Chairman Thompson:

This letter and the enclosure respond to the Congressional directive contained in Division HH, Title IV, Section 501 of the Consolidated Appropriations Act, 2023 (Public Law 117-328), as amended by Division B, Title I, Section 105 of the Continuing Appropriations and Extensions Act, 2025 (Public Law 118-83), which directed the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to submit to the Committee on Agriculture, Nutrition, and Forestry of the Senate and the Committee on Agriculture of the House of Representatives a report on Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer (EBT) theft prevention.

As outlined in statute, the enclosed report contains the following:

- Information on SNAP EBT theft, including a description of standard reporting methods for States to collect and share data with USDA on the frequency and location of SNAP electronic benefit theft;
- Comparisons of replacement of stolen SNAP benefit policies across States;
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THE HONORABLE GLENN 'GT' THOMPSON

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Sincerely,

/s/Thomas J. Vilsack

THOMAS J. VILSACK
Secretary

Enclosure



**Supplemental Nutrition Assistance Program (SNAP)
Electronic Benefit Transfer (EBT) Theft
U.S. Department of Agriculture
Food and Nutrition Service
A Report to Congress
November 26, 2024**

Introduction

Section 501 of Title IV within Division HH of the Consolidated Appropriations Act, 2023 (Public Law 117-328), codified at 7 U.S.C. 2016a, includes several provisions concerning electronic benefit transfer (EBT) theft in the Supplemental Nutrition Assistance Program (SNAP). The enclosed report responds to the specific legislative requirement set forth in Section 501(a)(5)—as amended on September 26, 2024, by Section 105 of Title I of Division B of the Continuing Appropriations and Extensions Act, 2025 (Public Law 118-83)—that USDA apprise Congress of what the Food and Nutrition Service (FNS) has learned about SNAP EBT theft; steps the Agency has taken to prevent such theft; recommendations for preventing this type of theft in the future; and a comparison of State plans related to reimbursement of stolen SNAP benefits, prevention, and other relevant procedures. The information contained in this report reflects FNS’ activities through October 2024.

To establish definitions for this report, *SNAP EBT theft* arises when criminals use unauthorized, electronic methods to take control over the benefit account without the SNAP household’s knowledge. Criminals can steal benefits through several electronic methods, including the following:

- *Card skimming.* Card skimming occurs when a criminal places a reading device on a retailer’s point-of-sale (POS) equipment.¹ The reader collects key card information—such as the personal account number (PAN) and personal identification number (PIN)—when a client swipes their card during a transaction. Criminals then use this card information to steal a household’s benefits.
- *Phishing activities.* Criminals use scams over text, email, or phone to gather key card information. Increasingly, scams use sophisticated technology to deceive SNAP households. For example, in some States, scammers have spoofed, or imitated, the phone number of a government service agency or the EBT customer service number to obtain key card information from households.

¹ Point-of-Sale is the system or device through which a retail transaction is processed and payments from customers are accepted.

- *Card cloning.* Once key card information has been stolen through methods like skimming or phishing, criminals can use equipment to write stolen card information onto blank magnetic stripe cards. Criminals then use cloned cards to steal SNAP benefits after the SNAP State agency reloads benefits to the household accounts. While some cloned cards are physical cards, criminals can also use stolen information to complete card-not-present transactions, like online purchasing.
- *Algorithmic attacks.* Using rapid and repeated inquiries, criminals can use bots to exploit online vulnerabilities to discern key card information. For example, criminals have used this technology to exploit balance inquiry features of SNAP internet retailers to identify valid PANs and PINs. Bots are also used to identify cards that have positive balances.
- *Stolen FNS numbers.* Every FNS-authorized SNAP retailer is assigned a store number by FNS. Terminals, or point-of-sale devices, must be coded with a valid FNS store number to access the SNAP EBT payment network and process transactions. When FNS store numbers are stolen, criminals obtain these store numbers illegitimately to gain access to the EBT payment network. Once criminals have network access, they often use stolen SNAP card PANs and PINs to drain households' benefit accounts.

These attacks on SNAP benefits undermine the food security and well-being of our Nation's most vulnerable individuals and families. Oftentimes, SNAP households do not know their benefits have been stolen until their card is declined in the checkout lane due to an insufficient or zero balance.

Information on SNAP Benefit Theft

The Consolidated Appropriations Act, 2023, included provisions for the replacement of stolen SNAP benefits with Federal funds and required that States implement plans for reviewing stolen benefit claims and issuing benefit replacements. The Act also required that FNS establish standard reporting methods for States to collect and share data with FNS on SNAP EBT theft. Whereas prior to 2023 FNS had limited information on the frequency or location of SNAP benefit theft, States' reports on their replacement of stolen benefits provide some insight on the scope of this issue.

Standard Reporting Methods

In January 2023, FNS provided SNAP State agencies with guidance on the data elements they must report to FNS on a quarterly basis to provide information on the incidence of reported EBT theft affecting SNAP households. FNS selected these data elements based on the information readily available to States through their EBT data systems and SNAP households when they file a stolen benefits claim.

States must report seven standards data elements:

1. Total number of stolen benefits claims submitted due to card skimming, card cloning, or similar fraudulent methods.
2. Total number of stolen benefits claims approved for replacement due to card skimming, card cloning, or similar fraudulent methods.
3. Total number of denied stolen benefits claims due to invalid claims, including the number of claims from households that exceeded the two-replacement limit per fiscal year and the number claims that did not meet timeliness standards.

4. Total number of households that submitted stolen benefits claims, including the number of households that submitted approved claims and the number of households that submitted denied claims.
5. Total number of fraudulent transactions, including the number of fraudulent transactions from approved claims and the number of fraudulent transactions from denied claims.
6. Total value of benefits determined to have been stolen due to card skimming, card cloning, and similar fraudulent methods.
7. Total value of replaced stolen benefits due to card skimming, card cloning, or similar fraudulent methods.

Frequency and Location of Benefit Theft

Using the data FNS has been collecting from States on their replacements of stolen SNAP benefits, FNS created a publicly available dashboard on its website.² This dashboard is updated once per fiscal quarter. This dashboard helps answer questions such as: (1) how many States have implemented their plans to replace stolen benefits and started reporting required data to FNS; (2) how frequently stolen benefit replacement claims are denied; and (3) what is the total value of approved stolen benefit replacement claims nationwide? Accordingly, this dashboard contains some information on the frequency and location of reported benefit theft. (See Figure 1 below for a map of total claims received by States to date.)

It is important to note that data on location is only available at the State level. Specifically, States provide data on how many SNAP households filed a claim in that State, and the number of claims for stolen benefits the SNAP State agency received and approved. (For State-level information about replacement of stolen benefits, please see the appendix.) Victims of these thefts generally do not know where or how benefits were stolen (e.g., the retailer location where the card was skimmed); therefore, SNAP households are not able to provide that information when making claims for reimbursement. Accordingly, the data cannot be used to determine trends for where SNAP benefits were stolen.

It is also important to note that the data only reflects fraudulent transactions for which SNAP households filed claims to replace their benefits. SNAP households that experienced benefit theft may not know that they can seek replacement of benefits and not file a claim. Additionally, the Consolidated Appropriations Act, 2023, limits SNAP households to filing two claims per year. Therefore, this data does not capture the total number of households victimized by SNAP benefit theft or the total value of SNAP benefits stolen.

² This report contains data States reported to FNS through the second quarter of fiscal year 2024 (January to March). See “SNAP Replacement of Stolen Benefits Dashboard,” FNS, at <https://www.fns.usda.gov/data-research/data-visualization/snap-replacement-stolen-benefits-dashboard> for these data. The dashboard has since been updated to reflect data received from State agencies for the third quarter of fiscal year 2024 (April to June).

Figure 1: Map of Total Stolen Benefit Claims Received by State from January 2023 through March 2024 (Beginning of Federal Fiscal Year 2023 Quarter 2 through the end of Federal Fiscal Year 2024 Quarter 2).

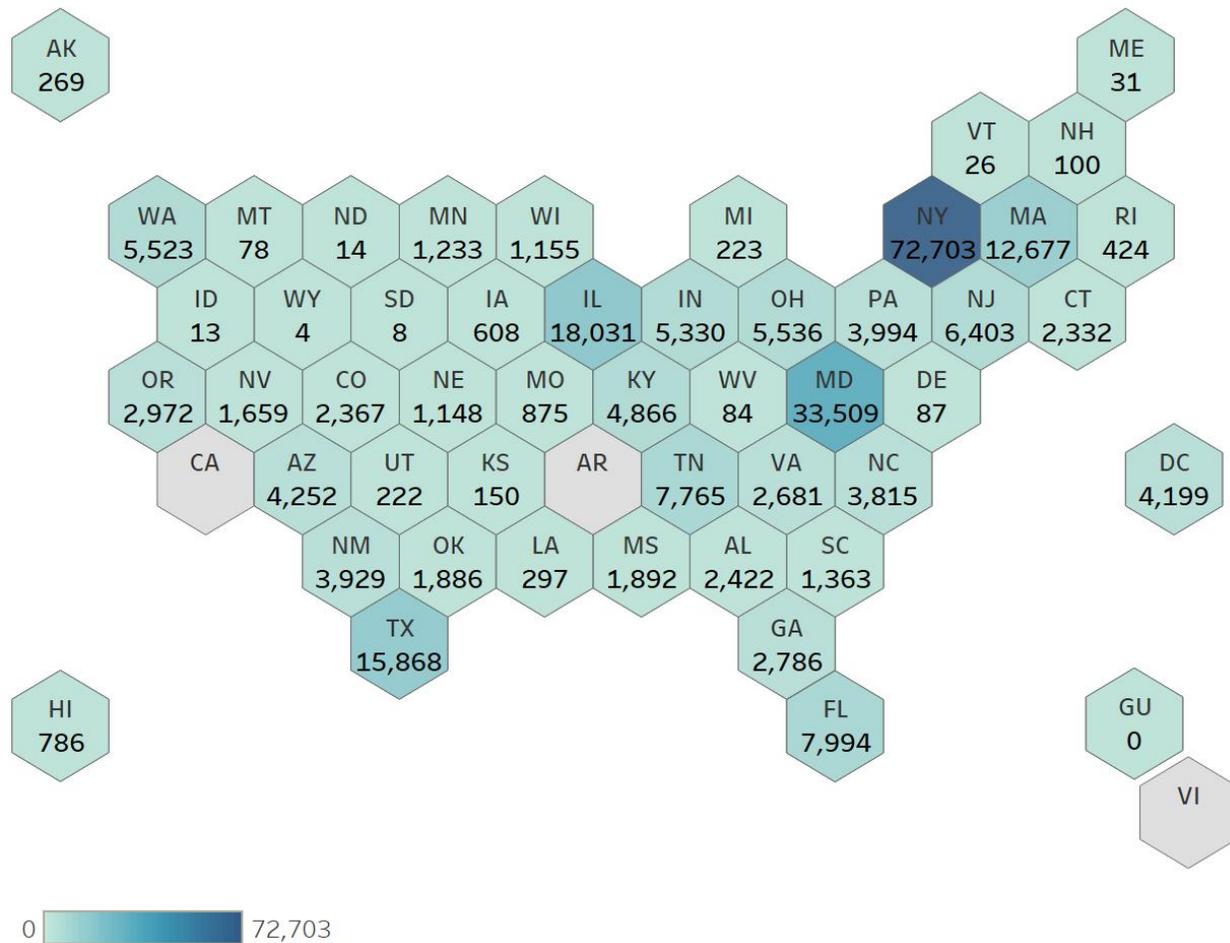


Figure notes: Arkansas and the U.S. Virgin Islands began replacing benefits at the end of September 2024 due to technology challenges. California began replacing benefits December 1, 2023. However, due to a needed change to its information systems, California could not begin reporting required data elements to FNS until the third quarter of fiscal year 2024.

FNS cautions against making direct comparisons between States, particularly during the early data reporting periods. While reporting began in the second quarter of fiscal year 2023, most States (44) did not start reporting claims until the fourth quarter of fiscal year 2023.

Comparing Replacement of Stolen SNAP Benefit Data and Policies Across States

When reviewing the data, it is important to note that a few factors make comparison between States challenging. Specifically, while reporting began with the second quarter of fiscal year 2023 (January to March), the majority of States (44) did not begin reporting data to FNS until the fourth quarter of fiscal year 2023 (July to September).^{3,4} For additional information regarding how long specific States have been

³ Two SNAP State agencies began reporting in the second quarter of fiscal year 2023. Eleven SNAP State agencies reported data in the third quarter of fiscal year 2023. Forty-four SNAP State agencies reported data in the fourth quarter of fiscal year 2023, as noted. Fifty SNAP State agencies reported data in the first quarter of fiscal year 2024.

⁴ States have 45 days to submit their data after the end of a fiscal year quarter, leading to some additional time before data becomes available on the FNS publicly available dashboard.

reporting data, please see the appendix.⁵ However, many States have not consistently included the entire reporting period of three months when they have reported data. For example, for the third quarter of fiscal year 2023, one State that began reporting in that quarter only reported 10 days of data. Additionally, State submissions include some retroactive claims from thefts that occurred in prior quarters.⁶ The Consolidated Appropriations Act, 2023, which was signed into law on December 29, 2022, provided for the retroactive replacement of some stolen benefits—specifically, benefits stolen between October 1, 2022, through September 30, 2024.

Since reporting began through the second quarter of fiscal year 2024, 50 SNAP State agencies have reported data. That includes all States except for Arkansas, California, and the U.S. Virgin Islands. Arkansas and the U.S. Virgin Islands began replacing stolen SNAP benefits at the end of September 2024—at the time of this report. Their delays were due to technological challenges. California began replacing benefits with Federal funds December 1, 2023. After California finalized a change to its information systems, the State began reporting the required data elements, starting with data for the third quarter of fiscal year 2024. For fiscal year 2024, California used Federal funds to replace \$6,574,076 in stolen benefits in the first quarter and \$25,591,741 in stolen benefits in the second quarter.

Differences in State policies affecting claim timeliness are also relevant when considering replacement of stolen benefits data, as these differences affect when benefits are counted as replaced in the data. *Timeliness* refers to the actions of both SNAP households and State agencies, and timeliness policies are outlined in each State’s replacement of stolen benefits plan. (See Figure 2 below for summary information on SNAP household and SNAP State agency timeliness standards, according to their State plans.) As an example, States have varying policies about when a SNAP household must file a claim after they become aware of a theft. Some States require the SNAP household to report the theft within 10 calendar days after it was discovered; other States allow recipients 60 calendar days from the date of theft to make a report. Likewise, policies that determine when a SNAP State agency must approve or deny a claim also vary by State. Some States validate claims within 10 calendar days, while others validate claims within 30 calendar days. A description of the timeliness policies for each State is available on the [FNS website](#).⁷

⁵ In addition to the appendix, see “Summary by State of the Replacement of Stolen SNAP Benefits Process,” FNS, last updated October 2, 2024, for the date each State implemented its plan:

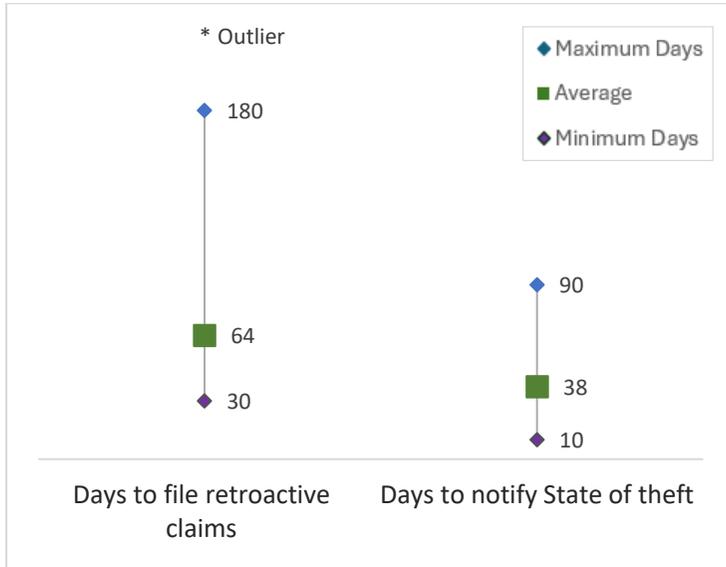
<https://www.fns.usda.gov/sites/default/files/resource-files/snap-rsb-state-plan-summary-chart-100224.xlsx>.

⁶ Each State plan defines the period that the State will honor retroactive claims. After the period for submitting retroactive claims ends, incidents of retroactive theft are no longer included in the State’s data.

⁷ “Summary by State of the Replacement of Stolen SNAP Benefits Process,” FNS, last updated October 2, 2024, <https://www.fns.usda.gov/sites/default/files/resource-files/snap-rsb-state-plan-summary-chart-100224.xlsx>.

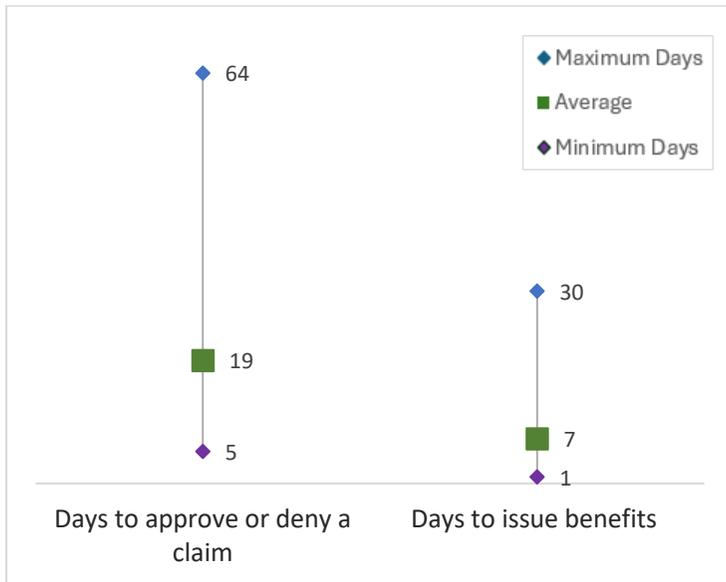
Figure 2: Household and State Timeliness Standards in Replacing Stolen Benefits, According to State Plans.

Household Timeliness Standards



This figure highlights the maximum, average, and minimum number of days across all States for households to file retroactive claims and to notify the SNAP State agency of theft. The outlier represents a single State, which allows 365 days for households to file retroactive claims.

State Timeliness Standards



This figure highlights the maximum, average, and minimum number of days across all States for SNAP State agencies to approve or deny a claim and to issue benefits after a claim is approved, according to State plans.

States also vary in their approaches to preventing SNAP EBT theft. SNAP State agencies choose among a variety of optional card security services offered by their EBT host processors. Examples of services States can purchase include restricting use of common PINs (e.g., 1234) or allowing SNAP households to opt into blocking certain kinds of transactions (e.g., out-of-state or online transactions). The following summarizes the extent to which 53 SNAP State agencies have adopted card security services commonly used in the debit and credit industry, according to States' EBT host processors, as of October 2024:

- Implementing chip EBT cards: 2 States (in process)
- Disallowing common PINs: 30 States
- Allowing households to block certain types of transactions: 42 States
- Allowing households to freeze and unfreeze EBT cards: 41 States
- Validating the card authentication value (CAV)⁸: 40 States

Summary of Replacement of Stolen Benefit Data

According to the stolen benefits data that States have submitted to FNS, through the second quarter of fiscal year 2024, 232,005 SNAP households have submitted 246,589 claims for EBT benefit theft (see Table 1 below). Through this same reporting period, about \$95 million in SNAP benefits have been replaced by States since enactment of the Consolidated Appropriations Act, 2023.⁹ When compared to the total value of SNAP benefits issued, the value of replaced stolen benefits remains low across all quarters—less than 0.3 percent for every quarter.¹⁰ On average, \$436 was replaced per approved claim through the second quarter of fiscal year 2024.

Table 1: Total Submitted Stolen Benefit Claims by Quarter (Q) and Federal Fiscal Year (FY).

Total Submitted Stolen Benefit Claims by Quarter (Q) and Federal Fiscal Year (FY)						
FYQTR	Total States Reporting	Total Submitted Claims	Total Households Submitting Claims	Total Fraudulent Transactions Submitted	Total Value of Replaced benefits	Replaced Benefits as Percent of Total Issuance
FY23 Q2	2	4,484	2,564	6,432	\$1,341,230	0.240%
FY23 Q3	11	10,915	9,852	34,063	\$4,519,047	0.091%
FY23 Q4	44	61,577	57,985	158,708	\$24,425,585	0.130%
FY24 Q1	50	86,902	82,266	217,932	\$31,901,191	0.155%
FY24 Q2	49	82,711	79,338	194,750	\$32,539,679	0.167%
Overall Total	50	246,589	232,005	611,885	\$94,726,732	0.147%

Table note: Maryland reported data for the second quarter of fiscal year 2023 through the first quarter of fiscal year 2024. Maryland’s reported data for the second quarter of fiscal year 2024 contained data discrepancies; therefore, Maryland is not counted under “Total States Reporting” for fiscal year 2024 Quarter 2. At the time of this report, FNS is working with the Maryland SNAP state agency to receive a revised data report.

FNS used a net issuance figure of regular monthly SNAP issuance, Disaster SNAP benefits, other issuance (e.g., Pandemic EBT benefits), replacement SNAP benefits, and removed returns and expungements. Totals only include States that are reporting data on replacements of stolen benefits.

As of the second quarter of fiscal year 2024, 80 percent of all processed claims were approved across all States reporting data (see Figure 3 below). (*Processed claims* refer to submitted claims that a State has approved or denied.) Submitted claims were rejected for the following reasons, in order of frequency, invalid claim, untimely claim, and two replacements per year limit.

⁸ The Card Authentication Value (CAV) is stored in the magnetic stripe of an EBT card. The CAV must be verified to process card present transactions. While the CAV data in the magnetic stripe can be skimmed, it does provide a security measure that protects cards from being cloned with only knowledge of the PAN.

⁹ This total does not include the value of replaced stolen benefits in California (for any quarters, using Federal funds) or Maryland (for the second quarter of fiscal year 2024). Further, as noted previously, this data does not capture the total number of households victimized by SNAP benefit theft or the total value of SNAP benefits stolen. The data is limited to fraudulent transactions for which SNAP households filed claims to replace their benefits. Additionally, the Consolidated Appropriations Act, 2023, limits SNAP households to filing two claims per year.

¹⁰ FNS used a net issuance figure of regular monthly SNAP issuance, Disaster SNAP benefits, other issuance (e.g., Pandemic EBT benefits), replacement SNAP benefits, and removed returns and expungements. Totals only include States that are reporting data on replacements of stolen benefits.

- Each State established its own definition of an *invalid claim*, which generally describes replacements that fall outside of the scope of the statutory authority. An invalid claim is one submitted for theft that did not occur due to card skimming, card cloning, or other similar fraudulent means. For example, a claim based on someone stealing a household’s physical EBT card and PIN from their wallet would be considered invalid.
- An *untimely* claim refers to a denied stolen benefits claim that did not meet the timeliness standard set by the SNAP state agency in its replacement of stolen benefits State plan.
- A *two-replacement limit* claim refers to a stolen benefits claim that was denied because the SNAP household exceeded the number of replacements it can receive in a fiscal year. Per Section 501(b)(2)(B) of the Consolidated Appropriations Act, 2023, SNAP households may receive a maximum of two replacements for benefits that are stolen due to card skimming, card cloning or similar fraudulent methods per fiscal year.

Figure 3: Approved and Denied Stolen Benefit Claims, Totals, and Reasons for Denial through Quarter 2, Fiscal Year 2024.

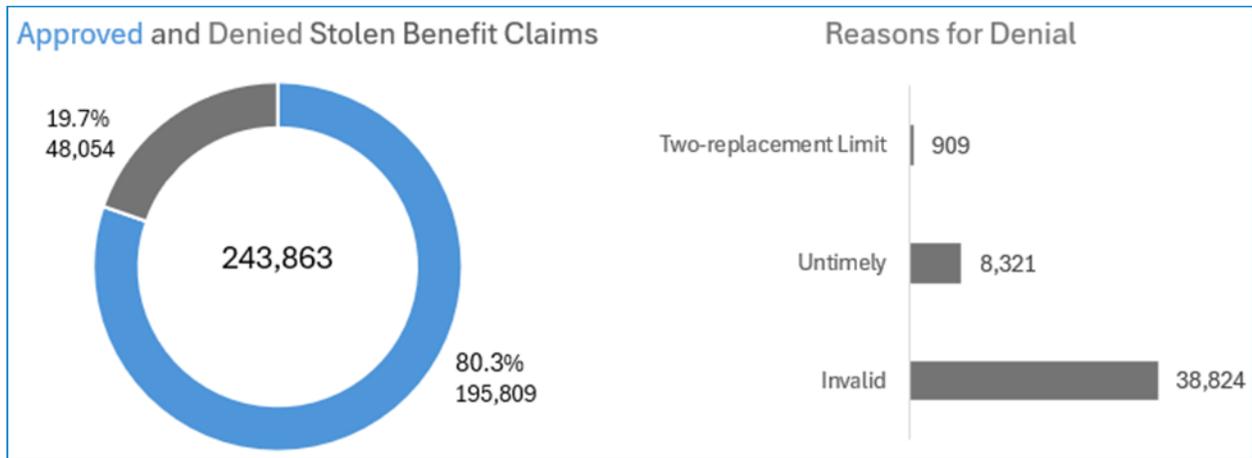


Figure note: These rates and totals pertain to processed claims.

Approval rates for replacement of stolen benefits claims vary widely by State. These variances should be considered when evaluating or comparing total approved claims across States. For example, as of the second quarter of fiscal year 2024, Colorado, Illinois, Nebraska, New Mexico, and Ohio had average approval rates of 92 percent or higher. Conversely, Alaska, Mississippi, North Dakota, South Dakota, and West Virginia had average approval rates of 47 percent or lower. (For additional information about States’ approval rates, please see the appendix.)

Coordination with Key Partners

FNS coordinates with several key partners to prevent SNAP EBT theft. Of note, two efforts have engaged relevant partners in dialogue about SNAP EBT modernization, as modernization is necessary to reduce SNAP EBT theft. Specifically, in summer 2021, FNS convened a series of 12 roundtables on topics such as fraud prevention, online purchasing, and utilizing mobile technology.¹¹ These roundtables brought together representatives from State agencies, retailers and retailer associations, EBT payment processors, mobile payment processors, advocacy organizations, and others. The primary purpose of the roundtables

¹¹ Regarding fraud prevention, earlier round tables included discussion with community and advocacy organizations regarding the need to educate SNAP households about benefit theft.

was to identify areas for improvement in SNAP electronic benefit transfer technology, to understand impediments to implementing such improvements, and to educate partners about forthcoming technological improvements and industry trends. Recent roundtables have focused on identifying a potential path for implementing chip-enabled SNAP EBT cards, as participants broadly agreed this change is essential for improving card security and better aligning SNAP EBT technology with industry standards.

In 2023, FNS began a separate, complementary effort to modernize SNAP EBT with relevant partners. For this effort, FNS engaged the Accredited Standards Committee X9 (ASC X9) to establish an industry forum.¹² Building upon the insights identified in the SNAP EBT modernization roundtables, the goal of the forum was to convene key partners and experts to collectively determine the best path for implementing EBT chip cards and contactless payment technology in SNAP. The forum, X9's largest to date with over 500 members, includes SNAP State agencies, the Administration for Children and Families (ACF) of the U.S. Department of Health and Human Services, anti-hunger advocates, EBT payment processors, mobile payment processors, retailers and retailer associations, card manufacturers, point-of-sale providers, and others. Meetings were held weekly and regularly included over 100 participants. In August 2024, the ASC X9 published a new version of the X9.58 standard, which sets the standard for EBT financial transaction messages. The revised standard supports the use of chip cards (contact and contactless), mobile wallet payments, and additional enhancements to the SNAP Electronic Healthy Incentive Project (eHIP), and SNAP online purchasing.¹³ Publication of the standards allows States, EBT vendors, and retailers to begin testing and implementing more secure EBT cards.

In addition to the roundtables and the X9 industry forum, FNS has engaged key partners in other coordinated efforts to prevent SNAP EBT theft. Descriptions of these additional efforts follow.

State Agencies

FNS efforts to prevent EBT benefit theft have included first and foremost State partners who administer the program. In fiscal year 2023, FNS awarded over \$1.8 million in SNAP Fraud Framework Implementation grants to three States—Michigan, Mississippi, and Wisconsin—for efforts to prevent SNAP EBT theft. Historically these grants have been used to improve SNAP recipient integrity. In recent years, FNS reinforced in the request for applications that grant funds could be used to implement SNAP EBT theft and fraud prevention, detection, and investigation techniques. The three States proposed developing media campaigns to educate SNAP households about how to protect their benefits. They also proposed other fraud prevention strategies. For example, Wisconsin proposed implementing EBT card features that help protect against card skimming and cloning, such as opt-in protections for out-of-state transactions and cardholder text alerts. FNS recently awarded five additional SNAP Fraud Framework Implementation grants targeting prevention of EBT benefit theft in fiscal year 2024. The recipients are Kentucky, Michigan, Minnesota, Mississippi, and Texas.

FNS is exploring the feasibility of partnering with States to share information about SNAP EBT cards that may have been compromised. This information stems from a broader FNS goal to use data analytics to

¹² The Accredited Standards Committee X9 Inc. is a non-profit organization accredited by the American National Standards Institute (ANSI) to develop and maintain national standards for the financial services industry that improve payments and securities transactions, protect data, and facilitate information exchange. ASC X9 regularly convenes industry representatives that have an interest in SNAP EBT modernization. Their industry forums provide an open forum to discuss and reach consensus on key issues.

¹³ “New Version of X9.58 Standard Upgrades USDA SNAP EBT Cards to Include Chip-on-Card Technology, Significantly Decreasing Opportunity for Fraud,” accredited Standard Committee X9 Inc., September 17, 2024, <https://x9.org/new-version-of-x9-58-standard-upgrades-usda-snap-ebt-cards/>.

establish SNAP EBT theft detection models. These models are in the early stages of development but will be informed by transaction data associated with reports of stolen SNAP benefits. In developing these models, FNS aims to proactively detect compromised SNAP EBT cards and alert the relevant States. States could then notify the SNAP households that their cards may be compromised and, if warranted, inform them their card will be deactivated and replaced.

FNS also participates in monthly EBT fraud meetings where all States are invited and encouraged to attend. State officials lead these meetings, which provide a forum for States, FNS, U.S. Department of Agriculture (USDA) Office of Inspector General (OIG), the United States Secret Service, and other law enforcement entities to share information about trends and promising practices in EBT benefit theft. During these meetings, FNS provides technical assistance to States regarding fraud prevention, detection, and investigation strategies. At least 80 officials attend these calls.

Administration for Children and Families (ACF)

FNS collaborates with ACF to provide technical assistance on preventing SNAP EBT theft. In October 2022, the two agencies issued a memo urging States to take preventive measures to protect SNAP and Temporary Assistance for Needy Families (TANF) recipients from benefit theft.¹⁴ The memo included specific actions States could take. For example, it encouraged States to use certain card security services offered by EBT payment processors—specifically, EBT host processors¹⁵—to improve educational materials for SNAP and TANF households on how to safeguard their benefits. The letter also included strategies States could communicate to SNAP and TANF recipients to protect their benefits, such as opting in to alerts on certain types of transactions, e.g., online purchases.

Additionally, FNS and ACF jointly hosted a webinar in November 2022 on strategies for reducing EBT card skimming.¹⁶ The panel brought together representatives from TANF and SNAP, as well as experts on card skimming. Panelists shared how agencies can educate participants on how to protect their benefits, among other topics. Collaboration between FNS and ACF is ongoing.

Federal Law Enforcement Agencies

USDA has coordinated with multiple Federal law enforcement agencies—the Offices of the United States Attorneys, the Federal Bureau of Investigation, the United States Secret Service, and Homeland Security Investigations—to stop SNAP EBT theft. Specifically, USDA’s OIG officials have partnered with other Federal law enforcement agencies to pursue investigations involving theft. For example, USDA OIG supported a task force that led to the arrest of five men in June 2023 who were skimming and cloning EBT cards in San Diego, California.¹⁷ Similarly, USDA OIG partnered with Federal law enforcement

¹⁴ “Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) Electronic Benefit Transfer (EBT) Card Skimming Prevention – Tools and Resources,” ACF and FNS, October 31, 2022, <https://www.fns.usda.gov/snap/snap-tanf-ebt-card-skimming-prevention>.

¹⁵ An EBT host processor is the vendor contracted by a State to operate the State’s central EBT database.

¹⁶ OFA Webinar: Strategies for Reducing EBT Card Skimming for TANF and SNAP Programs - Project Improve,” ACF, November 2, 2022, <https://peerta.acf.hhs.gov/content/ofa-webinar-strategies-reducing-ebt-card-skimming-tanf-and-snap-programs-project-improve>.

¹⁷ “Five Charged in Theft of California Benefits for Low Income Families,” U.S. Attorney’s Office, Southern District of California, June 6, 2023, <https://www.justice.gov/usao-sdca/pr/five-charged-theft-california-benefits-low-income-families>.

agencies to secure arrests of criminals conducting electronic SNAP benefit theft in Brooklyn, New York,¹⁸ the northern district of Texas,¹⁹ and San Diego, California.²⁰

To support investigations, FNS provides USDA's OIG with relevant transaction data, program expertise, and knowledge on benefit theft trends. FNS also maintains direct communication with other Federal investigative agencies through the monthly State fraud meetings referenced above.

Retail Food Stores and Retailer Associations

FNS coordinates its SNAP EBT theft prevention efforts with retail food stores and retailer associations in a few ways. In December 2022, FNS and USDA OIG issued guidance to retailers on how to protect their SNAP customers from skimming. This document titled, "Protect SNAP Customers from Card Skimming at Your Point-of-Sale," described how skimming occurs and how retailers can protect their POS devices. It urges retailers to regularly inspect their POS equipment and to train their employees on suspicious behavior.

In August 2023, FNS sent a letter to SNAP internet retailers in response to rising incidents of benefit theft. Specifically, criminals were using the balance inquiry feature at internet retailers to determine whether card PANs and PINs were valid and when benefits were loaded on cards. Consequently, FNS required that internet retailers take steps to mitigate this threat. FNS provided various options for applicable retailers to fulfill the requirements, including removing the balance inquiry feature from their website. FNS also communicated these requirements for retailers on its "Retailer Criteria to Provide Online Purchasing to SNAP Households" web page.²¹

Finally, FNS has coordinated with retail food stores and retail associations to ensure they are prepared for the program's transition to SNAP EBT chip cards. In the ASC X9 Industry Forum, FNS coordinated with retail partners on the complex technical aspects of integrating and updating POS devices to accept the new technologies. In May and September of 2024, FNS sent notices to retailers and retail associations that chip and contactless payment technology is coming.²² On the FNS "SNAP EBT Modernization" web page, retailers can find technical resources like test scripts to aid with the transition.²³ FNS will be issuing additional retailer notices via email and U.S. Mail with ongoing updates and reminders throughout the coming months. These notices are provided to and amplified by retailer associations, payment processors, and other partners.

EBT Industry Groups

FNS has engaged multiple EBT industry partners in efforts to prevent SNAP EBT theft, including SNAP EBT payment processors (which include EBT host processors and third-party payment processors),

¹⁸ "Two Defendants Charged with Stealing or Misusing \$20 Million in Supplemental Nutrition Assistance Program," U.S. Attorney's Office, Eastern District of New York, February 27, 2024, <https://www.justice.gov/usao-edny/pr/two-defendants-charged-stealing-or-misusing-20-million-supplemental-nutrition>.

¹⁹ "Liberian Man Sentenced to 20 Years for Stealing \$2.6M in SNAP Benefits from Needy," U.S. Attorney's Office, Northern District of Texas, March 20 2024, <https://www.justice.gov/usao-ndtx/pr/liberian-man-sentenced-20-years-stealing-26m-snap-benefits-needy>.

²⁰ "Seven Charged in Theft of California Benefits for Low-Income Families," U.S. Attorney's Office, Southern District of California, March 4, 2024, <https://www.justice.gov/usao-sdca/pr/seven-charged-theft-california-benefits-low-income-families>.

²¹ "Retailer Criteria to Provide Online Purchasing to SNAP Households," FNS, updated October 9, 2024, <https://www.fns.usda.gov/snap/retailer-requirements-provide-online-purchasing>.

²² "Attention: California and Oklahoma SNAP EBT Retailers," FNS, updated November 21, 2024, <https://www.fns.usda.gov/snap/ebt/modernization/retailer-notice/chip-card-CAOK>.

²³ "SNAP EBT Modernization," FNS, updated November 18, 2024, <https://www.fns.usda.gov/snap/ebt/modernization>.

mobile payment processors, e-commerce providers, and POS service providers.²⁴ FNS has coordinated primarily with industry groups through the SNAP EBT modernization roundtables and the ASC X9 Industry Forum.

In addition to developing specifications for SNAP EBT chip cards, FNS and the EBT industry partnered to develop specifications for online SNAP purchases. The new specification allows for the requirement of a card security code and expiration date to complete an internet purchase. This change will help ensure that purchases are initiated by the authorized SNAP recipient and reduce incidents of SNAP EBT theft.

FNS also forged partnerships with third-party payment processors to mitigate SNAP EBT theft. During biweekly meetings, FNS provides education about distinguishing authorized retailers from criminals seeking to gain access to the SNAP EBT payment network. In doing so, FNS aims to prevent criminals from using stolen FNS numbers to gain access to the SNAP EBT network to steal benefits. During these meetings, FNS and third-party payment processors discuss solutions to this problem.

Incorporating Industry Standards

FNS has incorporated industry standards into its SNAP EBT theft prevention efforts in several ways. In October 2022, FNS issued policy guidance to States informed by conversations with the EBT industry and aligned with industry standards.²⁵ The guidance strongly encouraged States to replace compromised EBT cards when notified by SNAP households that their benefits were stolen. Requiring that compromised cards are replaced is a common industry practice. The guidance also encouraged States to enable card features like allowing card holders to block out-of-state or online purchases, or place freezes on card activity before benefits are loaded. These card features are common in the consumer payment industry.

FNS has worked closely with State agencies, industry groups, and retailers to support piloting the use of new EBT technology that is more aligned with industry standards. FNS is providing technical support to SNAP State agencies exploring and implementing SNAP EBT chip cards. This effort will shift SNAP's reliance on less-secure magnetic stripe technology to technology U.S. credit and debit card issuers use to protect consumers and reduce fraud. Two States, California and Oklahoma, are early adopters of this technology and are working to transition to using SNAP EBT chip cards in 2025.

In March 2023, USDA announced a partnership with four States—Illinois, Massachusetts, Missouri, and Oklahoma—to pilot contactless payments in SNAP, including mobile payments.²⁶ This modernization effort will give program participants the option to use contactless payment methods, like tapping or scanning their personal smart phones, instead of their physical EBT cards. Contactless payments are considered more secure than magnetic stripe payments. Contactless payments also increase convenience for SNAP households. Because contactless payment technology relies on the same technology used for chip cards, this pilot can move forward now that the ASC X9 finalized the updated EBT standard.

²⁴ An EBT host processor is the vendor contracted by a State to operate the State's central EBT database. A third-party payment processor is a business entity that facilitates enabling a retailer to accept SNAP benefits as payment. A POS service provider is a business entity that provides the hardware and software necessary for a business to accept payments for sales.

²⁵ "Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) Electronic Benefit Transfer (EBT) Card Skimming Prevention – Tools and Resources," ACF and FNS, October 31, 2022, <https://www.fns.usda.gov/snap/snap-tanf-ebt-card-skimming-prevention>.

²⁶ "USDA Selects Five States to Test Mobile Contactless Payments in SNAP," FNS, updated March 8, 2023, <https://www.fns.usda.gov/news-item/fns-006.23>. Louisiana subsequently withdrew from the pilot.

Section 501(a)(2) of the Consolidated Appropriations Act, 2023, mandates that the Secretary of USDA promulgate regulations through notice-and-comment rulemaking. These regulations should require SNAP State agencies to take security measures to detect and prevent the theft of benefits, including through card skimming, card cloning, and other similar fraudulent methods. Accordingly, FNS is developing proposed regulatory changes that modernize SNAP EBT technology and bring it into closer alignment with industry standards.

Recommendations for Preventing Benefit Theft

While the consumer payment industry has strengthened protections against theft by advancing its technology over the last few decades, SNAP participants remain vulnerable. FNS has the following recommendations on how to protect SNAP households from benefit theft:

- 1) Current regulations do not require the use of any particular benefit access technology. Since 2004, SNAP State agencies have issued EBT cards with magnetic stripes. However, EBT cards with chip and contactless payment technology have the potential for enhanced security features that reduce skimming and cloning attacks when compared to magnetic stripe technology. FNS recommends that States adopt these more secure payment technologies. On October 28, 2024, FNS sent a letter to State SNAP Commissioners encouraging the transition to chip cards. As described above, FNS is also developing a proposed rule for publication in fiscal year 2025 that will establish requirements and timeframes for State agencies to upgrade to these more secure payment technologies.
- 2) SNAP State agencies can choose among a variety of optional card security services offered by their EBT host processors, as previously discussed. Examples of services include blocking out-of-state transactions or transactions at internet retailers or disallowing easy-to-guess PINs. Because of these options, card security varies for SNAP households and depends on the State in which they reside. The October 2024 letter from FNS to State SNAP Commissioners encourages States to adopt more of these preventative services. FNS' proposed rule will also outline basic card security services that States must adopt to ensure that SNAP households in all States have the same basic protections.

Conclusion

Through the efficient implementation of the Consolidated Appropriations Act, 2023, States have begun to collect and report data to FNS on replacement of SNAP benefits stolen through electronic methods like skimming. To date, this data presents an incomplete picture on the total number of incidents of SNAP benefit theft, but it provides some insight into the scope of the problem. Comparing replacement of stolen benefit data across States is challenging for a few reasons, including variance in when States began reporting data and State policies on timeliness standards.

FNS has redoubled its efforts to detect and prevent electronic benefit theft, in part through collaboration with an array of Federal and non-Federal partners. Partners include State agencies, the Administration for Children and Families at HHS, Federal law enforcement agencies, SNAP retailers and retailer associations, and various EBT industry groups. Two efforts in particular—the SNAP modernization roundtables and the X9 EBT Industry Forum—engaged relevant partners in dialogue about SNAP EBT modernization to combat SNAP EBT theft. These partnerships provide a solid foundation from which to continue the work of preventing electronic benefit theft.

FNS has encouraged the SNAP EBT community to adopt industry standards for EBT technology. In 2022, FNS issued policy guidance to States informed by conversations with EBT industry stakeholders and aligned with industry standards. Additionally, FNS has worked with State agencies, industry groups, and retailers to support piloting new EBT technology that is more aligned with industry standards, such as chip cards and mobile wallet payments. FNS is also developing a forthcoming rule that will propose changes to regulations aimed to modernize SNAP EBT technology and bring it into alignment with industry standards.

Appendix

Summary of Replacement of Stolen Benefits Data by State, as of the end of Quarter 2 of Fiscal Year 2024.

State/Territory	No. of Quarters Reporting Claims	Total Households Submitting Claims	Total Households w Purchase	Households Submitting Claims as a Percent of Total Households	Total Claims Submitted	Average Claim Approval Rate	Total Replaced Benefits	Replaced Benefits as a Percent of Total Issuance
Alabama	4	2,405	920,911	0.261%	2,422	70.1%	\$1,175,074	0.066%
Alaska	3	269	84,473	0.318%	269	31.2%	\$260,397	0.117%
Arizona	4	4,221	1,126,319	0.375%	4,252	77.3%	\$1,472,411	0.071%
Colorado	3	2,352	680,037	0.346%	2,367	91.9%	\$1,029,387	0.108%
Connecticut	4	2,197	373,353	0.588%	2,332	67.0%	\$866,107	0.091%
Delaware	2	87	103,286	0.084%	87	65.8%	\$31,145	0.023%
District of Columbia	3	4,199	120,302	3.490%	4,199	88.4%	\$1,484,324	0.585%
Florida	3	7,853	2,841,805	0.276%	7,994	77.0%	\$3,435,404	0.070%
Georgia	2	2,706	1,010,303	0.268%	2,786	81.8%	\$1,106,914	0.068%
Guam	3	0	55,325	0.000%	0	0.0%	\$0	0.000%
Hawaii	3	786	184,537	0.426%	786	79.9%	\$451,097	0.082%
Idaho	3	13	91,568	0.014%	13	55.0%	\$2,330	0.001%
Illinois	3	17,541	2,172,527	0.807%	18,031	98.4%	\$8,810,392	0.246%
Indiana	3	5,330	765,791	0.696%	5,330	88.8%	\$1,070,896	0.098%
Iowa	4	608	410,277	0.148%	608	87.7%	\$329,517	0.061%
Kansas	3	150	147,997	0.101%	150	52.1%	\$75,086	0.024%
Kentucky	3	4,641	742,189	0.625%	4,866	62.4%	\$1,691,565	0.175%
Louisiana	3	297	1,036,813	0.029%	297	75.7%	\$112,904	0.007%
Maine	3	31	165,928	0.019%	31	75.0%	\$9,861	0.003%
Maryland	4	29,174	950,621	3.069%	33,509	77.5%	\$12,296,810	0.756%
Massachusetts	2	12,491	867,530	1.440%	12,677	79.9%	\$5,095,002	0.414%
Michigan	2	223	1,243,225	0.018%	223	73.9%	\$87,973	0.006%
Minnesota	3	1,192	559,349	0.213%	1,233	62.2%	\$655,480	0.092%
Mississippi	3	1,807	270,585	0.668%	1,892	39.1%	\$400,232	0.062%
Missouri	3	552	680,422	0.081%	875	79.5%	\$392,742	0.031%
Montana	3	70	58,243	0.120%	78	58.7%	\$29,471	0.024%
Nebraska	3	1,136	162,367	0.700%	1,148	93.1%	\$642,269	0.254%
Nevada	3	1,659	582,087	0.285%	1,659	63.2%	\$575,390	0.072%
New Hampshire	3	99	64,667	0.153%	100	78.3%	\$29,722	0.025%
New Jersey	3	6,205	753,032	0.824%	6,403	89.9%	\$2,924,618	0.204%
New Mexico	3	3,885	470,477	0.826%	3,929	94.4%	\$1,894,569	0.237%
New York	3	66,372	3,448,874	1.924%	72,703	71.7%	\$25,101,082	0.439%
North Carolina	3	3,620	1,271,973	0.285%	3,815	91.8%	\$1,888,415	0.078%
North Dakota	3	14	41,666	0.034%	14	46.7%	\$6,380	0.008%
Ohio	4	5,536	1,377,239	0.402%	5,536	93.2%	\$2,453,565	0.077%
Oklahoma	3	1,824	740,626	0.246%	1,886	53.2%	\$426,920	0.035%
Oregon	4	2,822	944,682	0.299%	2,972	81.5%	\$986,323	0.060%
Pennsylvania	3	3,850	1,998,251	0.193%	3,994	71.9%	\$1,218,451	0.037%
Rhode Island	2	381	109,551	0.348%	424	53.8%	\$85,586	0.052%
South Carolina	4	1,355	905,335	0.150%	1,363	76.4%	\$417,293	0.030%
South Dakota	4	8	50,857	0.016%	8	20.8%	\$374	0.000%
Tennessee	2	7,765	496,769	1.563%	7,765	74.7%	\$3,343,785	0.421%
Texas	4	15,153	2,614,576	0.580%	15,868	83.4%	\$6,869,701	0.101%
Utah	3	218	183,283	0.119%	222	67.2%	\$74,651	0.025%
Vermont	5	26	69,374	0.037%	26	65.6%	\$9,635	0.004%
Virginia	3	2,460	940,126	0.262%	2,681	90.7%	\$1,114,333	0.079%
Washington	3	5,180	1,295,159	0.400%	5,523	76.6%	\$1,846,051	0.123%
West Virginia	3	84	307,118	0.027%	84	43.5%	\$21,635	0.005%
Wisconsin	3	1,154	554,430	0.208%	1,155	67.0%	\$422,508	0.042%
Wyoming	3	4	41,842	0.010%	4	8.3%	\$954	0.002%
Total	5	232,005	37,088,077	0.626%	246,589	80.3%	\$94,726,732	0.147%

Table note: Three States are excluded from this table—Arkansas, California, and the U.S. Virgin Islands. Arkansas and the U.S. Virgin Islands began replacing stolen SNAP benefits at the end of September 2024—near the time of this report. Their delays were caused by technological challenges. FNS expects to see their first data reports in the fourth quarter of the fiscal year. California began replacing benefits December 1, 2023. California will begin reporting required data elements for the third quarter of fiscal year 2024.