

February 4, 2015

Directors Bicha and Brohl:

The EBT stakeholder group respectfully submits its recommendations regarding the enforcement of proper use of Electronic Benefits Transfer (EBT) cards at ATMs in Colorado. The group met several times during the past few months; following the group's final meeting in January and subsequent opportunity for all members to review the report, the group has unanimously agreed on several key recommendations to be pursued in preventing improper EBT access.

The group recommends the following, as described in the "Recommendations" section:

- *Policy Changes:* Modify EBT access legislation to include marijuana retail outlets and adult entertainment venues; consider policy strategies to sanction repeat consumer and business offenders.
- *Consumer Awareness and Business Outreach:* The state will implement strategies both to notify EBT users of restricted access points and engage business owners to clearly declare restricted EBT access in restricted locations.
- *Vendor Contract Enhancements:* As the state solicits a new EBT vendor, expectations regarding the types of data, reports, and the physical cards to support enforcement will be set in the RFP and subsequent contract,
- *Invest in Data Infrastructure:* Create a data warehouse to facilitate cross-department/cross-agency data sharing, monitoring, and oversight.

Together, these recommendations combine short-term, proactive solutions to comply with federal mandates and longer-term solution to enhance monitoring and enforcement efforts. None of the recommended strategies burden either consumers or businesses with the onus of compliance. These recommendations sufficiently address the overarching goal of reducing unlawful use of EBT cards, while ensuring that recipients of public benefits can access their benefits across Colorado.

Respectfully,



Levetta Love  
Director, Office of Economic Security

