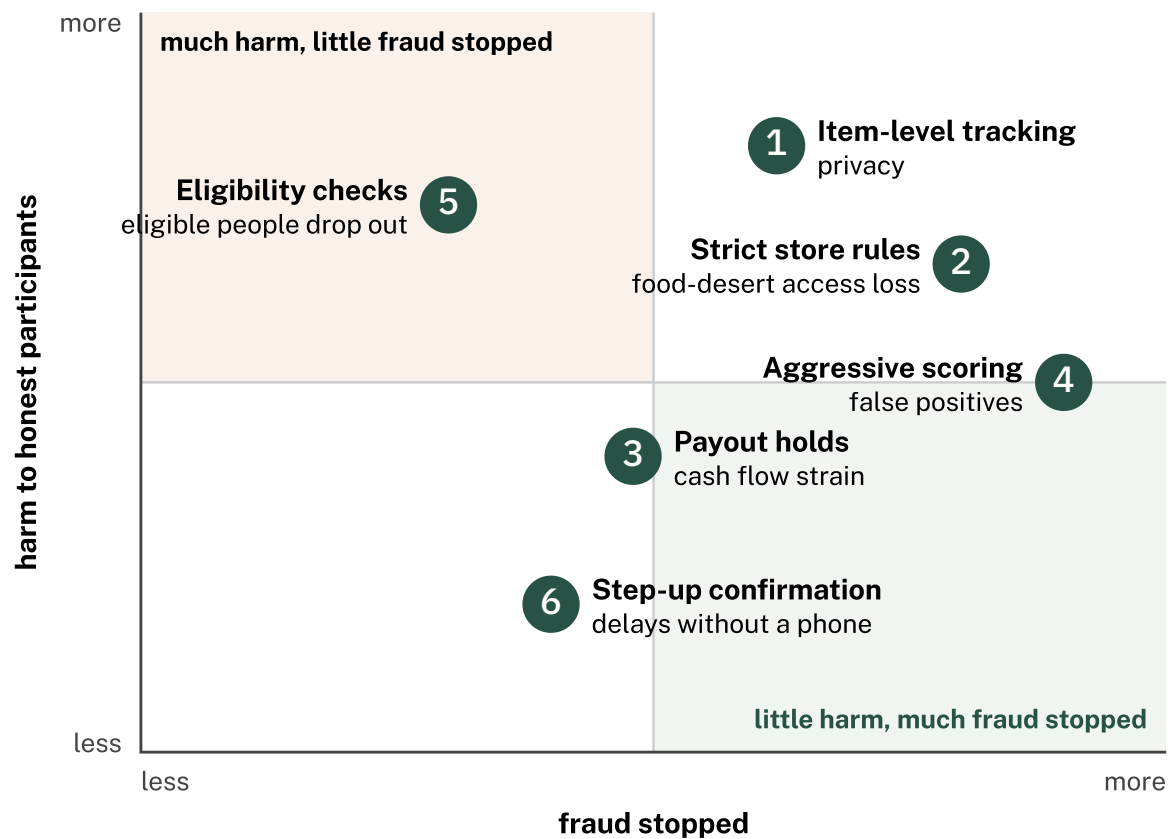




1 Item-level basket tracking

Targets: overcharging, ineligible sales, fake baskets

Harm: privacy: the state records what poor people eat, and could use it for food-choice policing

Mitigation: data minimization, retention limits, statutory purpose limits, aggregation for research

2 Strict store rules

Targets: front stores, trafficking

Harm: food-desert access loss when small stores leave the program

Mitigation: subsidized point-of-sale equipment, exceptions for underserved areas, phased deadlines

3 Payout holds and delays

Targets: hit-and-run trafficking, unrecoverable losses

Harm: honest small stores face cash flow strain

Mitigation: time limits on holds, partial holds, standard tier for clean history

4 Aggressive scoring

Targets: all store-side fraud

Harm: false positives; slow appeals can close an honest store

Mitigation: appeal deadlines with service levels, independent review, published error rates

5 Heavier eligibility checks

Targets: eligibility fraud, duplicates

Harm: eligible people drop out because of paperwork and delays

Mitigation: data matches to cut paperwork, documents only on mismatch

6 Step-up confirmation for large spends

Targets: skimming drains

Harm: delays for recipients without phones

Mitigation: fail-open path, opt-in, store-based fallback