

Order set by cost,
dependency, and
loss size; no
dates

PHASE 1

Credentials and payout risk

No new data standard needed.
Attacks skimming and hit-and-run
trafficking.

PHASE 2

Item-level data standard

Basket standard, certified POS,
ineligible items rejected,
reference prices begun. Privacy
rules come first.

PHASE 3

Analytics and the investigation queue

Reconciliation, card-store graph,
store-month scoring, a budget-
sized queue, case feedback.

RETAILERS

- Upgrade terminals for chip and tap
- Accept payout tier rules

- Install certified registers or the subsidized app
- Keep product price lists current

- Keep purchase invoices
- Submit them on request
- Accept audits

POS VENDORS

- Support EMV for EBT
- End stripe fallback by the deadline

- Implement the basket message standard
- Pass certification

- Provide data hooks for catalog updates

STATES

- Issue chip cards
- Run the recipient app or approve third-party apps
- Vary load timing

- Fund outreach to small stores
- Update EBT processor contracts

- Join graph-based recipient investigations
- Resolve NAC and income matches quickly

FNS federal agency

- Set chip standards and the fallback deadline
- Implement payout tiers in settlement, using the existing ALERT score

- Publish the standard; certify vendors
- Adopt privacy and retention rules

- Contract distributor data feeds
- Build scoring and the queue
- Publish appeal metrics

MEASURE

- Skimming claims per thousand cards, before and after the switch

- Share of EBT volume carrying item data
- Count of small stores that left the program

- Confirmation rate of reviewed cases
- Reversal rates on appeal
- Trafficking estimate from the next FNS study