



November 2, 2023  
<Sent via electronic mail>

The Honorable David Schweikert  
Chairman, Oversight Subcommittee  
United States House of Representatives  
1100 Longworth Building  
Washington, DC 20515  
c/o [WMSubmission@mail.house.gov](mailto:WMSubmission@mail.house.gov)

Dear Mr. Schweikert and Subcommittee Members,

As the only national organization singularly devoted to reducing welfare fraud for the last 50 years, the United Council on Welfare Fraud wants to commend the witnesses that testified before the Ways and Means Oversight Subcommittee Hearing on Pandemic Fraud on October 19, 2023, and add our voices to reinforce their powerful statements.

UCOWF is a national professional organization of investigators, administrators and claims and recovery specialists who are on the frontlines combating welfare fraud in the nation's public assistance programs. Our members come from across the country at the local, county and state level who work every day to protect the integrity the Supplemental Nutrition Assistance Program (SNAP), Medicaid, cash assistance and other social safety net programs to safeguard taxpayer resources.

Fraud, waste, and abuse make up the overwhelming majority of improper payments in government assistance programs. It is nothing new, yet the pandemic exposed the lack of common-sense oversight and accountability required to safeguard taxpayer funds and provided our nation's leaders with an opportunity to address this ongoing epidemic.

Linda Miller and Amy Simon, both seasoned and highly skilled experts, provided candid and forthright testimony, shedding light not only on the alarming extent of fraud during the pandemic but also on the ongoing exploitation of federal programs.

In response to Congressman Schweikert's question, Linda Miller succinctly summarized the challenge posed by transnational criminals, stating, "*We've got a dynamic adversary, and we have very, very static processes that address them.*" In the public assistance programs, the state and local agencies charged with distributing the benefits to the recipients are woefully unprepared to prevent fraud because these government agencies do not have access to basic technology to verify the identity of the applicant.

As Linda Miller aptly noted, government agencies that distribute public assistance benefits are bound by antiquated laws that prohibit the utilization of identity verification technology used in the private sector. Public assistance programs remain vulnerable and targeted by bad actors looking for easy profit and that did not end with

**CAROL CHRISTIAN**  
*KS – President*

**ASHLEY WILKES**  
*FL – President-Elect*

**CHRISTOPHER O'NEIL**  
*FL – Vice-President*

**ELLIS BRYSON**  
*WV – Secretary*

**ANDREW PETITT**  
*WV – Treasurer*

**LAURA LINDSEY**  
*KS – Business Manager*  
[UCOWFmail@gmail.com](mailto:UCOWFmail@gmail.com)

**ANDY McCLENAHAN**  
**DAWN ROYAL**  
*Co-Chairmen Directors*  
*Intergovernmental*  
*Committee*  
[Dawn.Royal.UCOWF@gmail.com](mailto:Dawn.Royal.UCOWF@gmail.com)  
[Andrew.K.McClenahan@gmail.com](mailto:Andrew.K.McClenahan@gmail.com)

United Council on  
Welfare Fraud  
PO Box 164  
Westmoreland, KS 66549  
785.477.5424  
[www.ucowf.net](http://www.ucowf.net)





**CARROL CHRISTIAN**  
KS – President

**ASHLEY WILKES**  
FL – President-Elect

**CHRISTOPHER O’NEIL**  
FL – Vice-President

**ELLIS BRYSON**  
WV – Secretary

**ANDREW PETITT**  
WV – Treasurer

**LAURA LINDSEY**  
KS – Business Manager  
[UCOWFmail@gmail.com](mailto:UCOWFmail@gmail.com)

**ANDY McCLENAHAN**  
**DAWN ROYAL**  
Co-Chairmen Directors  
Intergovernmental  
Committee  
[Dawn.Royal.UCOWF@gmail.com](mailto:Dawn.Royal.UCOWF@gmail.com)  
[Andrew.K.McClenahan@gmail.com](mailto:Andrew.K.McClenahan@gmail.com)

United Council on  
Welfare Fraud  
PO Box 164  
Westmoreland, KS 66549  
785.477.5424  
[www.ucowf.net](http://www.ucowf.net)

the pandemic – history is continuing to repeat. The lack of identity verification for public assistance continues to cost taxpayers billions of dollars in SNAP alone.

For the last decade or more, there has been an ongoing debate within state and federal agencies about whether integrity should interfere with access to government benefits. UCOWF unequivocally asserts that integrity and access are not mutually exclusive but rather stand as separate and equally vital pillars.

We wholeheartedly endorse Amy Simon's testimony, both in her written submission and her oral presentation to the committee, which states, *“Suggesting that benefit timeliness and benefit accuracy must be opposing goals is a false dichotomy. Benefit timeliness for eligible claimants is often most possible when fraud attacks are identified and prevented. Eligible claimants and taxpayers pay a steep price when policymakers do not take fraud prevention, detection, investigation and/or prosecution as seriously as the circumstances warrant.”* Ms. Simon's insights are strikingly accurate, and her conclusions hold true for all federal assistance programs, including SNAP. We commend her insight and emphasize her statements.

Finally, we offer our support to the five key actions Linda Miller identified that Congress could take to prevent the recurrence of issues at hand. A commonality between all state and local agencies on the frontlines of detecting, preventing, and investigating fraud is they are understaffed, underfunded, and undervalued. The impact of having a dedicated fraud office with direct funding cannot be underestimated; it has the potential to drastically alter the current landscape, where state agencies grapple with under-resourced fraud detection units.

As you can see, we could break down each part of the witnesses’ testimony and offer line-by-line support. We were exceedingly pleased to note that the witnesses provided information that aligns so closely to UCOWF’s advocacy goals. We are unaware of any hearing that provided as much practical, real-world insights that promise to guide the development of methods and practices to aid investigators in their daily pursuit of identifying, preventing, and prosecuting welfare fraud.

We eagerly anticipate discussions on fraud and program integrity with all members of the Committee and Subcommittee and extend a warm invitation for any questions or comments. If you have any questions, please contact us at [UCOWFmail@gmail.com](mailto:UCOWFmail@gmail.com).

Sincerely,

Carrol Christian  
President  
United Council on Welfare Fraud

