

RHODE ISLAND DEPARTMENT OF HUMAN SERVICES

Date: June 8, 2018
DHS Transmittal 18-08

TO: DHS Staff
FROM: Office of Policy, Research and Analysis

SUBJECT: EBT Security Procedures

Purpose:

The purpose of this memo is to replace DHS Transmittal # 16-02 with the following revised procedures relating to EBT security to limit the potential misuse of SNAP and RIW funds while operating the EBT Benefits Payment System.

Procedures:

DHS Administrative and Field Offices staff must follow the following steps:

1. Segregation of Duties – staff members who issue cards cannot determine eligibility (and vice versa). An ET will process eligibility and the CLERK will issue the cards and prepare for mailing. **Cards must be issued on the same day they are authorized.**
2. EBT Card Inventory at DHS Providence Office- EBT Coordinator shall maintain an inventory log of all EBT supplies distributed to regional offices and shipments received into the Providence office. A monthly physical inventory count will be conducted and compared to the inventory log and any discrepancies will be researched. The inventory log will be reviewed regularly to monitor when supplies are running low and need to be reordered. The EBT Coordinator shall restrict physical access to blank EBT cards and supplies to the EBT Coordinator and Corrective Action Officer. The Correction Action Officer will conduct a quarterly physical inventory count and compare to EBT Coordinator's inventory log.
3. EBT Cards delivered to Regional Offices from the DHS Providence Office – the clerk picking up the cards to bring to the regional office must sign out the cards, verify the number of cards in the box (or boxes), and add them into their EBT Card Inventory Log (available in the "Official Forms" folder in the document library).
4. EBT Card Inventory Log – DHS Field Offices shall maintain an EBT Card Inventory log and print an "EBT Cards Printed by Office" report daily from RI Bridges. Recording the number of EBT cards issued/printed on these logs provides greater assurance that cards will not be misplaced or stolen. Discrepancies between the Inventory Log, the EBT Cards Printed by Office Report, and cards on hand shall be reported and investigated. Results, conclusions and interventions need to be documented for local and State audit and site review purposes.
5. Card Inventory for Issuance Workers – issuance workers shall monitor the status of card inventory daily, including the number of cards issued (both new and replacement), damaged/destroyed, printed at other locations and vice versa. Cards shall be distributed in packs determined by supervisor.
6. Daily Audits – the supervisor responsible for the issuance of cards shall compare the remaining blank cards at the end of the day with the EBT Inventory Log and EBT Card Print History Report, accounting for issued and non-issued cards. Discrepancies shall be reported and investigated with the results, conclusions and interventions recorded in writing so that documentation is available for audit purposes.
7. Lock up all cards not intended for issuance.
8. Monthly Audits – perform a monthly audit of the blank cards in the office. Each month, staff will send a copy of the EBT Card Inventory Log to the DHS EBT Coordinator at the Providence Office. Discrepancies shall be

reported and investigated with the results, conclusions and interventions recorded in writing so that documentation is available for audit purposes.

9. Destruction of Cards – on a daily basis, at least two people, not from the card issuance staff, shall destroy all cards that have been damaged or returned. The suggested method for destroying cards is to cut them into at least four sections or place them into a shredder bin. All returned and damaged cards must be tracked on the EBT Destroyed Log form (available in the Document Library). Additionally, the number of cards and names of the persons who destroyed them should be noted on the EBT Destroyed Card Log form. Cards that are damaged during card issuance also need be deducted from EBT Card Inventory Log.

10. Security of EBT Devices – DHS staff shall turn off or log out of EBT devices during times when authorized issuance staff are absent. If this is not possible, the machines must be stored in a locked room when not in use.

11. Restricted Access to Cards – DHS Regional Offices shall restrict physical access to the "bulk supply" of EBT cards and the daily "working supply" of EBT cards to those employees with designated issuance responsibilities. EBT PIN Terminal security codes and/or passwords are not to be shared under any circumstances. Similarly, unauthorized persons, including DHS department employees without issuance responsibilities, shall not have access to EBT equipment or card stock.

12. ebtEDGE Security – EBT Coordinator will review and initial security reports in FIS's ebtEDGE system. The EBT Coordinator will daily print and initial the "Log In and Log off" reports to monitor ebtEDGE user activity. The SNAP Corrective Act Officer will initial as well to confirm the results of the daily review to ensure the integrity of DHS staff with access to ebtEDGE.

13. Returned Card Procedure-see below

Returned EBT Card Procedures

When an EBT card is returned to office because client no longer needs benefits or a card was found and returned, a designated field office worker will:

- Look up the card status. If the card is active, change the status to inactive;
- Enter a note in RI Bridges noting the reason the EBT card was returned and will be destroyed;
- Follow the instructions for "Destruction of Cards" (#9 above);
- If the card cannot be shredded in the local office, forward to the EBT Coordinator in Providence Office

Undelivered/ Bad Address/ Homeless EBT Card Procedures

When an EBT card is mailed, but is undeliverable, the post office will return the card to the local field office. EBT cards may also get delivered to Providence office from Central Scan (see below). A designated field office worker will:

- Date stamp the returned envelope
- Verify the address in RI Bridges
- Contact the client for an accurate address if necessary
- If able to verify the address, resend the card to the client

If unable to reach client or correct address:

- Enter a note in RI Bridges, noting that the EBT card will be placed in the safe
- If no response after 30 days, deactivate and destroy card and make a note in client's file
- Follow instructions for "Destruction of Cards" (#9 above)
- If the card cannot be shredded in the local office, forward to EBT Coordinator in Providence Office

EBT cards returned to Central Scan:

Refer to SOP for Processing EBT cards received at Central Scanning memo.