



CDSS

WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

June 28, 2013

ALL COUNTY WELFARE DIRECTORS LETTER

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CaWORKs PROGRAM SPECIALISTS
ALL COUNTY CONSORTIA REPRESENTATIVES
ALL EBT COORDINATORS

FROM: TODD R. BLAND
Deputy Director
Welfare to Work Division

SUBJECT: MONITORING SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) ELIGIBILITY DETERMINATION SYSTEMS AND ELECTRONIC BENEFIT TRANSFER (EBT) CARD SECURITY

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

The purpose of this notice is to remind counties and the State Automated Welfare System (SAWS) consortia of their responsibility to comply with federal regulations related to monitoring SNAP eligibility determination systems and for ensuring EBT card security.

Monitoring of SNAP Eligibility Determination Systems

Each county and/or consortium is responsible for development, implementation, and maintenance and operations activities related to its SNAP eligibility determination systems. As a result, counties and consortia must ensure these systems comply with requirements specified in federal statute (Title 7 - Part 272.10 and Part 277.18). This means monitoring all SNAP eligibility determination systems that are maintaining, utilizing, and transmitting information concerning SNAP, including:

- (1) processing and storing all case file information necessary for eligibility determination and benefit calculation, identifying specific elements that affect eligibility, and notifying the certification unit of cases requiring notices of case disposition, adverse action and mass change, and expiration;

- (2) providing an automatic cutoff of participation for households which have not been recertified at the end of their certification period by reapplying and being determined eligible for a new period, and
- (3) generating data necessary to meet federal issuance and reconciliation reporting requirements. All data will be protected from unauthorized use and disclosure as required by state and federal law.

EBT Card Security

Federal regulations (Title 7 – Part 274.7 (b) and 274.11(c)) require counties to maintain adequate security over, and documentation/records for, EBT cards to prevent their theft, embezzlement, loss, damage, destruction, unauthorized transfer, negotiation, or use. Security requirements include, but may not be limited to:

- (1) Separation of duties for EBT card issuance responsibilities – ensure EBT card and benefit issuance duties are being performed by two people (or a second party review is conducted when only one staff person is working with the EBT system).
- (2) EBT card stock management – ensure a process is in place to verify receipt of blank EBT cards and maintain an EBT card inventory control log.
- (3) Control of returned EBT cards – ensuring that processes are in place to deactivate and destroy cards returned to the county office (e.g., an EBT returned card log).
- (4) EBT card storage – ensure cards are stored in a locked and secure location. Processes should also be in place to ensure the physical security of Card Activation and Personal Identification Number Selection (CAPS) devices, while in storage or in use during business hours.

If there are any questions regarding compliance with these federal requirements, please feel free to contact Valerie Delaney, for SAWS related questions, at (916) 654-5163 or Lucy Hildebrand, for EBT related questions, at (916) 653-8421.