

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



October 31, 2002

ALL COUNTY LETTER NO. 02-83

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: ELECTRONIC BENEFIT TRANSFER (EBT)

REASON FOR THIS TRANSMITTAL

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

The purpose of this letter is to notify County Welfare Departments (CWDs) of the process to be used in transmitting demographic information to the EBT system for authorized representatives (ARs) and designated alternate cardholders (DACs).

The EBT system provides for the issuance of EBT cards (at the option of the head of household) to ARs (food stamps) and DACs (cash programs). The EBT system further provides for specific customer services to be supported via the toll-free Automated Response Unit (ARU). Two of those services include requesting a replacement EBT card and changing an existing Personal Identification Number (PIN). An essential requirement to perform these functions is the ability to validate the identity of the caller to ensure the integrity of the process and protect the cardholder's account. The head of household/assistance unit is able to perform these functions because the necessary demographic information (name, social security number, date of birth) is provided to the EBT system by the CWD in normal operations. However, counties do not generally collect demographics for ARs or DACs. As a result, these functions are not available to such cardholders as the system is unable to verify their identity.

As a result of discussions with the County Welfare Directors Association and other county representatives, it has been determined that ARs/DACs shall be allowed to perform card replacement and PIN change via the ARU when their identity can be validated using actual demographics of the AR/DAC. In the event the AR/DAC has elected not to provide personal information for identity verification, or the Primary Payee does not desire to give that capability to the AR/DAC, the AR/DAC will be required to go to the county office for service. For those cases where the demographics of the AR/DAC are not supplied, the AR/DAC can still perform all other ARU functions using their card number as the identifier. It should also be understood that when a requested service requires transfer to a Citicorp Customer Service Representative (CSR), the CSR cannot release confidential EBT information without first validating the identity of the caller. The AR/DAC can always status (render inactive) their card as lost or stolen and can always initiate a claim without identifying demographics.

Use of AR/DAC demographics other than actual personal data is not authorized. Specifically, the county should not accept or submit to the EBT system any pseudo-

demographic data that has been created by an entity other than the eligibility system for the purpose of AR/DAC identity. However, where an AR/DAC is assigned a numeric pseudo SSN by the eligibility system, that number is acceptable for use as identity for individuals not eligible to obtain a SSN. Under no circumstances shall the county submit the demographics of the head of household to substitute for AR/DAC demographics. Additionally, counties may use discretion in establishing demographic data to be used by group home managers where that manager is responsible for multiple EBT cards.

The overriding consideration in establishing policy for AR/DAC card maintenance services is the fundamental need to ensure that the Primary Payee has full control over their benefits and who has access to those benefits. A Primary Payee can discontinue an AR/DAC's access at any time.

The ARU is programmed to not recognize all zeros as a valid date of birth or SSN. Likewise, CSR's have been instructed not to accept all zeros (or for that matter, all ones, nines, etc.) as a valid date of birth or SSN. The CSR is instructed to utilize best judgment in determining if the caller is in fact the cardholder. Only where the EBT system contains valid demographics and the caller accurately provides the demographics as contained in the record, will card replacement and PIN change be allowed. The accuracy of EBT system identity verification is entirely dependent upon the demographic data supplied by the eligibility system.

EBT Procedure

1. Counties shall utilize state form TEMP 2201 to add, change, or delete AR/DACs.
2. Counties shall ensure that both the Primary Payee and the AR/DAC are aware of the need to provide the date of birth and SSN for the AR/DAC in order for the AR/DAC to be able to perform card replacement and PIN change functions via the ARU. For face-to-face card issuance, this explanation should occur at the time of card issuance. Where form TEMP 2201 is mailed, a cover letter may be required to provide more detail about the roles of the AR/DAC and the intended use of personal data.
3. In the event the AR/DAC has not provided actual demographic data to the county, the county must ensure that AR/DAC demographic records submitted to the EBT system contain zeros in the date of birth and social security number fields.

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If you have any questions, please contact Stan Cagle, Manager of the EBT/Technology Unit, at (916) 654-1529 or David Badal of the Program Technology Bureau, at (916) 654-1405.

Sincerely,

***Original Document
Signed By***

BRUCE WAGSTAFF
Deputy Director
Welfare To Work Division