

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



September 12, 2006

ALL COUNTY LETTER NO. 06-37

TO: ALL COUNTY WELFARE DIRECTORS
ALL FOOD STAMP COORDINATORS**REASON FOR THIS TRANSMITTAL**

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

SUBJECT: ELECTRONIC BENEFIT TRANSFER SUPPORT SERVICES FOR THE
DISASTER FOOD STAMP PROGRAM

The purpose of this All County Letter (ACL) is to provide counties with:

- roles and responsibilities of counties and State offices related to the Electronic Benefit Transfer (EBT) system support in anticipation of and during the Disaster Food Stamp Program (DFSP);
- an overview of the EBT system features and options available for DFSP benefit issuance;
- factors that can impact a county when selecting EBT disaster features and options; and
- recommended advance planning activities.

Because disasters vary in their degree of severity, the County Welfare Department (CWD) can use the information provided in the attachment to evaluate the needs for benefit issuance in the event of a disaster. It is recommended that the information contained in this ACL be integrated with other DFSP material such as the Food and Nutrition Service (FNS) Disaster Food Stamp Program Handbook, the FNS EBT Disaster Plan Guide, and the California EBT Project Administrative User's Guide. These materials, along with the California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP) Section 63-900 for Food Stamp Emergency Assistance in Disasters, should also be reviewed when there is a potential disaster situation.

EBT support features for DFSP described in the attachment include the following:

- New screens have been added to the administrative terminal functionality for DFSP. The disaster screens will allow new cases to be established, issuance of new and replacement EBT disaster cards, and the ability to add benefits to the client's account.

- Pre-embossed Disaster EBT cards with pre-assigned personal identification numbers (PINs) that can be used when EBT card embossers are not available.
- EBT interface systems (batch, host-to-host and administrative terminal) have the capacity for accelerated client setup and card issuance. In order to accommodate the pre-embossed Disaster EBT card number, priority modifications to the counties' eligibility systems will be necessary.
- There are 200 disaster user identifications (IDs) available. The disaster user IDs are required to access the Disaster Account Setup/Card Issuance screen. The disaster user IDs also allow staff from other counties to assist the disaster county.
- In the event of a disaster, the EBT system has the ability to override the food stamp stagger date for monthly FSP benefits. Food stamp benefits can then be issued to recipients prior to their regular benefit availability date.
- Existing EBT reports will include DFSP data for card issuance, card replacement and benefit issuance.

The appendices include EBT Disaster Assessment, Client Setup and Card Issuance/Benefit Issuance Decisions and Scenarios, and a compilation of the "Points to Consider" sections in attachment.

This ACL supersedes the interim disaster procedures dated January 21, 2004 and November 10, 2004.

If you have questions regarding this letter, please contact Stan Cagle at (916) 654-1874 or Nancy Yee at (916) 654-1065.

Sincerely,

Original Document Signed by

CHARR LEE METSKER
Deputy Director
Welfare to Work Division

Enclosures

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DFSP Process Roles and Responsibilities

The County Welfare Department (CWD) may request implementation of the Disaster Food Stamp Program (DFSP) by submitting a request to the California Department of Social Services (CDSS), Food Stamp Branch (FSB), in the event of a county disaster. CDSS will review the request, provide any additional information and forward the request to the Food and Nutrition Service (FNS). FNS will either approve or deny the request and notify CDSS by telephone, followed by written confirmation. If the request is approved, FNS will provide CDSS with immediate notification and instructions.

County Welfare Department

- The CWD explores options to meet food needs when there is a disaster, such as requesting Emergency Food Assistance or using waivers to modify the regular Food Stamp Program (FSP). A county should consider DFSP implementation if it anticipates an increase in the number of FSP applicants and applying the regular FSP regulations can make it difficult for the county to respond to client needs as a result of the disaster. The county may request DFSP implementation when the county receives a presidential disaster declaration. The CWD contacts CDSS FSB to discuss and receive guidance on the DFSP process. Typically the county's Disaster Food Stamp Coordinator is the central point of contact with the FSB and other CDSS offices involved in DFSP.
- The CWD can transmit the formal application by fax to the FSB. The written application is then submitted by CDSS to the FNS for approval. FNS requires disaster data and a description of the impacted area as part of the DFSP request. The CWD can obtain disaster statistics, geographical descriptions, etc. from the county agency designated to coordinate disaster services. The State and/or FNS will ask the CWD to provide disaster status information, such as the number of DFSP applicants, throughout the duration of the DFSP or as needed.

CDSS Food Stamp Branch (FSB):

- Is the central point of contact within CDSS for the DFSP.
- Assists the CWD with obtaining information and exploring options.
- Assists the CWD with preparing a request for DFSP and, if needed, write request to waive specific federal regulations. The written request for DFSP is signed by the CDSS Director or a designated individual.
- Coordinates involvement of CDSS organizations in various activities, such as meetings, conference calls and correspondence related to DFSP. CDSS offices that may participate in DFSP discussions include Program Technology & Support, Fraud,

Fiscal Systems, Federal Reporting, CalWORKs, Legal, Emergency Food Assistance Program, Public Information Office, and Budgets.

- Prepares DFSP correspondence and/or information for FNS and other state/federal agencies as needed.
- Transmits documents to FNS.
- Reviews DFSP response upon completion of the program.

CDSS Program Technology and Support Bureau (PTSB), EBT Unit:

- Informs the Office of Systems Integration (OSI)-EBT Project Office of potential DFSP situations and provide copies of DFSP correspondence from CDSS and FNS.
- Acts as the point of contact for the county's EBT Coordinator/Project Manager for EBT policy and benefit issuance information.
- Reviews and monitor DFSP benefit issuance.

Office of Systems Integration (OSI), EBT Project Office:

- Is the point of contact with the State's EBT Contractor.
- Provides technical guidance on EBT system issues.
- Monitors EBT Contractor activities in response to DFSP.
- Reviews and monitor DFSP benefit issuance.

FNS

The FNS authorizes DFSP and establishes temporary eligibility standards for DFSP benefits. In order to implement DFSP, commercial channels of food distribution must be available and conditions must have improved to the extent that households have reasonable access to food outlets with sufficient food supplies.

FNS written approval to implement DFSP will typically include:

- Disaster certification and issuance procedures
- Description of geographic areas where the procedures will be in place
- Length of the application and benefit period
- Description of any approved waivers
- Reporting requirements.

Available Interfaces for DFSP Implementation

In a disaster situation, the CWD will assess whether or not their standard eligibility system (county or consortium) processes can be used for client setup, card issuance (new/replacement card), and benefit issuance. Keeping operations similar to the normal way of doing business can reduce the time needed to plan and develop new procedures and to train staff. However, a disaster situation often means being creative and adapting business processes as circumstances dictate. DFSP implementation requires that client demographic and benefit issuance information be provided by the county and transmitted to the EBT system either through batch files, host-to-host, or administrative terminal. DFSP implementation also requires that new and replacement over-the-counter (OTC) cards be provided to clients.

The following are descriptions of the EBT System Interfaces that can be used to implement DFSP:

Batch Interface

If it is operational, the eligibility system batch interface is capable of processing DFSP benefits. Batch file processing allows for the transmission of the pre-embossed Disaster EBT card number in the demographic file for case set-up. DFSP benefits sent from the county's eligibility system (with immediate availability dates) will be available as soon as the batch file is processed. It is important for the CWD to know which disaster support features are supported by their eligibility system.

Host-to-Host Interface

If it is operational, the eligibility system host-to-host interface is capable of issuing benefits when there is a disaster. The host-to-host Client Add/Change Request message allows for the assignment of the pre-embossed Disaster EBT card number. DFSP benefits issued are immediately available to the client. It is important for the CWD to know which disaster support features are supported by their eligibility system.

Administrative Terminal Interface

The administrative terminal can be used to set-up client accounts, emboss cards, and issue DFSP benefits. Using disaster logon IDs, the CWD can issue pre-embossed Disaster EBT cards and benefits through the disaster screens. DFSP benefits issued are immediately available to the client.

Points to Consider: Eligibility System Interface

- Can the CWD continue to use their standard EBT procedures?
 - Determine if the CWD's normal eligibility system interface with the EBT system is operational (damage assessment).
 - If the county eligibility system is unable to establish State Unique IDs (case numbers) for applicants or generate unique benefit authorization numbers during DFSP, the county must determine how case numbers and benefit authorization numbers will be created. This process can be developed in advance of a disaster or as part of a contingency plan (e.g., reserving a block of case numbers and benefit authorization numbers for DFSP use, and consider having the numbers available on paper).
- Connectivity to the EBT system can be established using the county's network or arrangements can be made with neighboring counties to provide connectivity through that county's network. The CWD should determine if accessing the EBT system through a neighboring county's system is feasible. The CWD should also determine if accessing their eligibility system through a neighboring county (with the same SAWS consortium system) is feasible. The details for this arrangement can be a pre-disaster planning activity - consider how to implement, e.g., add to an interagency agreement or some other document, such as a Memorandum of Understanding. Dial-up connectivity directly to the EBT contractor is not available.
- Unless the eligibility system has been programmed to issue pre-embossed Disaster EBT cards, the Disaster Account Setup/Card Issuance Screen is used to issue this type of card.
- Counties should strongly consider programming disaster food stamp rules (MPP Section 63-900) into their eligibility systems for faster processing of food stamp applications in the event of a large scale disaster.
- Each of the eligibility systems should analyze the Detailed System Design document and determine what changes are needed to incorporate features for EBT disaster support services. For example, changes may be necessary to accept an override of the food stamp stagger date, to incorporate the new benefit codes, or to accept the pre-embossed Disaster EBT card numbers.

Disaster Benefits

Early Release of Benefits for Existing Clients

Food stamp benefit issuance is staggered over the first 10 calendar days of the month for on-going recipients. An option for DFSP benefit issuance is to override regular (stagger) benefit availability dates for affected counties. Depending on recipients' normal issuance date, they may have their benefits available in their EBT account earlier than normal. Pending benefits (benefit files sent to the EBT system for issuance in the next month) will not be available to the cardholder prior to the first day of the intended month of issuance. This feature is countywide; it is not specific to the impacted zip code(s) within the county. The OSI-EBT Project Office must authorize the EBT Contractor to take this action.

Points to Consider: Early Release of Benefits for Existing Clients

- Evaluate whether this option is necessary. Depending on the date and the anticipated disaster duration, it may or may not be beneficial to override benefit stagger dates.
- Each eligibility system should determine whether or not system changes are needed to accept an override of the food stamp stagger date.
- If the CWD selects this option, the county should develop procedures to inform clients that food stamp benefits can be accessed on a specific date, e.g., use public service announcements.

DFSP Benefit Allotment

FNS determines DFSP benefit allotments for eligible households. Typically, the allotment is equal to the maximum amount allowable for the household size.

A county is able to issue benefits for DFSP through the administrative terminal Disaster screens or the existing Emergency Benefit Add screen.

DFSP benefit entries through the administrative terminal Emergency Benefit Add screen (using normal county logon IDs) cannot exceed \$2,500. Allotment amounts in excess of this will be rejected and an error code will be sent.

The administrative terminal Disaster Benefit Add screen also has a maximum benefit limit that will be set prior to issuing disaster logon IDs. If the Disaster Benefit Add screen maximum benefit amount is set to \$0, DFSP benefit issuance using the administrative terminal disaster logon IDs will not be allowed (issuance of DFSP benefits using normal county logon IDs will still be available). Setting the maximum benefit amount for the disaster screen to \$0 effectively disables the screen, allowing a separation of duties between those issuing disaster cards and those issuing disaster benefits (as mentioned in the FNS DFSP Handbook, program integrity is to be protected).

Benefit Replacement for Ongoing Households and Disaster Benefit Type

An ongoing food stamp household impacted by the disaster may be eligible to receive replacement benefits (MPP Section 63-900.55). Replacement benefits are deposited to the household's existing EBT account. However, if the CWD is not able to verify the client as an ongoing food stamp recipient through their eligibility system, the client is treated as a new case for DFSP benefits only. The recipient will receive a new EBT card and replacement benefits will be deposited into a new food stamp EBT account. To prevent duplicate benefit issuance, the county must enter case data from the administrative terminal to the county's eligibility system for reconciliation purposes as soon as possible. The benefit type code for replacement food stamp benefits is RFSP.

The benefit type code for disaster food stamp benefits is DFSP. The daily reconciliation process tracks the disaster benefits separate from ongoing benefit issuance. Using the correct benefit type code will ensure data is accurately recorded.

A county's eligibility system will recognize these benefit types (DFSP and RFSP) when they appear in the daily files if programmed, e.g., daily activity and grant expungement files.

Account Aging and Expungement

The EBT account aging process and procedures do not change when DFSP and RFSP benefits are issued. The EBT account is dormant (recipient must call CWD to access benefits) after 90 days without debit activity and benefits are expunged after 270 days without debit activity, MPP Section 16-120. DFSP and RFSP benefits are included in EBT expungement reports. These benefits can be used to reduce FSP overissuances in accordance with MPP Section 16-750, Food Stamp Overissuance Collections from EBT Accounts.

EBT Card Stock and PIN

EBT Card Stock and PIN

Regular EBT cards or pre-embossed Disaster EBT cards can be used when DFSP is implemented (see Appendix B). The CWD can use their regular EBT card stock for DFSP benefits if circumstances permit (card embosser is operational, cards are not damaged, etc.). If the county has insufficient EBT card stock on hand, additional blank Golden State Advantage EBT card stock is available for use during a disaster. If it is not feasible to use regular EBT card stock, the CWD should contact the FSB.

Points to Consider: EBT Card Stock

Determine whether regular stock of EBT cards can be used:

- Is the necessary equipment operational (embosser, CAPS device, etc.)?
- Can regular EBT cards be embossed at other county locations or at a neighboring county's card embosser? (use cross county embossing procedures)
- Will the County be able to follow its normal issuance procedures for the DFSP benefit issuance or will new procedures be written for staff?
- Is additional card stock needed?

Disaster EBT Cards

EBT disaster support includes an inventory of pre-embossed Disaster EBT cards. The following is a general description of the pre-embossed Disaster Golden State Advantage EBT cards:

- Graphic design is the same as the regular EBT card
- Primary Account Number (PAN) is pre-embossed on the card
- "Disaster" is embossed on the card
- Card is pre-pinned (i.e., the Personal Identification Number is pre-assigned)
- Cardholder's name does not appear on the card
- Pre-embossed Disaster EBT card and its associated PIN are sealed together in a mailer and enclosed in an envelope
- Card does not expire

Pre-embossed disaster EBT cards are issued to clients when a county is assisting a disaster county with card issuance because the disaster county's card embossers are not functioning or other DFSP situations. To request these cards, the CWD should initially contact the FSB.

When issuing pre-embossed Disaster EBT cards, whether using batch, host-to-host or administrative terminal, the card number must be entered into the system; this creates a unique situation for card issuance. The pre-embossed Disaster EBT card and its PIN are sealed together in a mailer and enclosed in an envelope. The CWD will need to develop procedures to efficiently obtain the card number and preserve the confidentiality of the cardholder's PIN in over-the-counter (OTC) card issuance. One way to meet this need is to have the client remove the card from the mailer and give the card to the worker for card number input. Disaster EBT cardholders can change their PIN by using the CAPs or ARU, which is the existing PIN change procedure.

New and replacement disaster EBT cards are captured in the card issuance report as an OTC issuance or OTC replacement issuance.

Points to Consider: Pre-embossed Disaster EBT Card

- o Estimate the number of pre-embossed Disaster EBT cards needed.
- o Discuss shipping location(s) for pre-embossed Disaster EBT card with the OSI-EBT Project Office.
- o Each eligibility system should determine if any system changes are needed to accept the pre-embossed Disaster EBT card numbers.

As a result of a disaster, the conditions of a community may be uncertain or not suitable for the county's normal method of issuance, therefore, the county should be aware of alternative methods to provide EBT cards to clients.

Card Replacement

When an ongoing client requires a card replacement and the pre-embossed disaster card is issued, the recipient's existing PIN carries forward to the new replacement card, i.e., the existing PIN must be used. Recipients should be advised to disregard the accompanying PIN on the card mailer.

Card Delivery/Distribution

Each box of EBT cards contains 500 cards. The EBT Contractor will use overnight delivery services (when available) to ship additional EBT cards. The county will need to provide the shipping location(s) for the additional card stock to the OSI-EBT Project Office, who will then coordinate card shipping with the EBT Contractor.

Card Storage and Security

Security measures for the storage of Disaster EBT cards and procedures for handling and distribution/delivery of the cards must be in place, along with reconciliation and control procedures. A manifest of Disaster EBT cards will be included with each shipment.

Points to Consider: Disaster EBT Card – Inventory Procedures

- o Develop security measures for the storage, handling and distribution of the cards. Since a disaster can occur anywhere in a county, a county should be aware of alternative secure storage locations.
- o Develop procedures for reconciliation and control of the cards. Inventory procedures should include:
 - Disaster EBT Card Inventory Control - EBT cards that are received.
 - Disaster EBT Card Return - At the end of the disaster or within a predetermined time frame, counties should coordinate the return of the unused inventory with the OSI-EBT Project Office.

Manual Vouchers

Manual vouchers may be used in the DFSP and the procedures remain the same as in non-disaster conditions (MPP Section 16-310). Retailers have manual vouchers on hand; however, if additional manual vouchers are needed, the retailer contacts the EBT Contractor.

Staffing

As part of pre-disaster planning, a county should review its plans for staffing CWD offices for EBT issuance. A county may find it beneficial to have in place interagency agreements with other counties, labor relations agreements, etc., should it be necessary to make staffing changes to provide DFSP services. (A discussion of these areas are beyond the scope of this document and should be examined as part of the broader disaster preparedness topic.) In general, cross-training staff lends to continuity of the program. Written procedures provide staff with reference materials and can promote consistency.

Disaster User Identification

The disaster user identification (ID) is used in several ways. Staff with a disaster user ID have limited access to the EBT system; they can access the Disaster Account Set-up/Card Issuance, Disaster Benefit Issuance, Balance Inquiry, Card History Inquiry and Search screens. A disaster user ID is required when issuing the pre-embossed disaster EBT cards via administrative terminal. The disaster user ID could also be assigned to eligibility workers from other counties who are assisting the disaster county with benefit and card issuance; benefits issuance is limited to DFSP and RFSP benefits. Two hundred (200) disaster user IDs are available, and more can be created if necessary. The OSI-EBT Project Office will maintain, refresh and distribute disaster user IDs. The CWD should contact the OSI-EBT Project Office for information about these user IDs. To request additional disaster user IDs, initial contact should be to the FSB.

Client Training Material

The county should be prepared to provide applicants with client training information, such as county-developed training material or PUB 387, "California Electronic Benefit Transfer (EBT) Card" for food stamp benefits. The Disaster EBT Card and PIN mailer also provides clients with basic EBT card usage information.

Points to Consider: Client Training Material

- Does the CWD have a supply of EBT training brochures/material for DFSP clients?
- Does information in the existing client training material need to be modified for DFSP? What about language translations of material? Can information be provided in a flyer or included with other disaster material the CWD is producing? An example of this is informing recipients who receive a replacement card to use their existing PIN and not to use the PIN provided on their pre-embossed Disaster EBT card mailer.
- How will client training material be distributed to clients, e.g., provided at the same time as the application, when clients receive their EBT cards, etc.?

Reporting and Reconciliation

DFSP program reporting requirements to FNS are subject to change and may include:

- Number of households approved
- Number of persons approved
- Value of benefits approved
- Average benefit per household
- Number of households denied
- Replacement benefits issued

County reports are due to FNS daily. The report form will be provided to the county during DFSP discussions with CDSS or FNS.

Reconciliation

Reconciliation areas may include:

- Card delivery and issuance reconciliation (cards shipped to a central location will need to be tracked until distributed to households). Each issuance site will need to maintain a beginning inventory, new cards received, total available cards issued and ending inventory.
- Benefit authorization and posting reconciliation
- Benefit expungement

- Notification to FNS of estimated benefits that will be issued to ensure that funding ceilings are adjusted.

According to the EBT Disaster Plan Guide, the daily reconciliation process should track disaster benefits as a separate item from ongoing benefit issuance. The disaster benefit type codes will facilitate the benefit reconciliation process. FNS reconciliation guidelines need to be followed so that benefits posted to accounts can be compared to benefits issued by the eligibility system.

EBT Reports of DFSP Data

DFSP data are included in the following EBT reports:

- Disaster EBT Cards are included in the Card Issuance Report as an initial OTC issuance and in the Administrative Actions Detail Report.
- Replacement Disaster EBT Cards are included in the Card Issuance Report as an OTC replacement issuance.
- DFSP benefits added to the Disaster EBT Card via the administrative terminal screen are included in the Administrative Transactions Report and the Administrative Transactions Detail Report.
- Replacement DFSP benefits are reported in the Administrative Transactions Report and the Administrative Transactions Detail Report.

EBT Disaster Assessment

Determine condition and availability of:

- Eligibility System
- County Network
- Connectivity to JPMorgan EFS (administrative terminal, embossers, and eligibility system)
- Internet Access (for access to SARS)

Estimate:

- Area affected by disaster
- Volume of new clients that will sign up for DFSP benefits
- Volume of existing clients requiring assistance (disaster or replacement benefits, card replacement, etc.)

Identify Location(s) where:

- New clients will apply for DFSP
- New clients will receive EBT cards.
- Existing clients will apply for DFSP or replacement benefits
- Existing clients can get replacement EBT cards

Ensure necessary staff is available at each location

Consider accessing resources from another county:

- Workers
- Administrative Terminal
- Eligibility System

Note: EBT staff can obtain disaster-related information from the County's Food Stamp and/or DFSP Coordinator or other county offices. Typically disaster information, such as the disaster area, number of people impacted or disaster assistance center location, is coordinated by a disaster/emergency services office.

Client Setup and Card Issuance/Benefit Issuance Decisions

Based on the condition and capabilities of county infrastructure and the estimated card issuance volume, the county needs to determine client setup, card issuance, and benefit issuance methods. Figures 1 and 2 on the following pages can assist in this determination.

Figure 1 - County Eligibility System Available

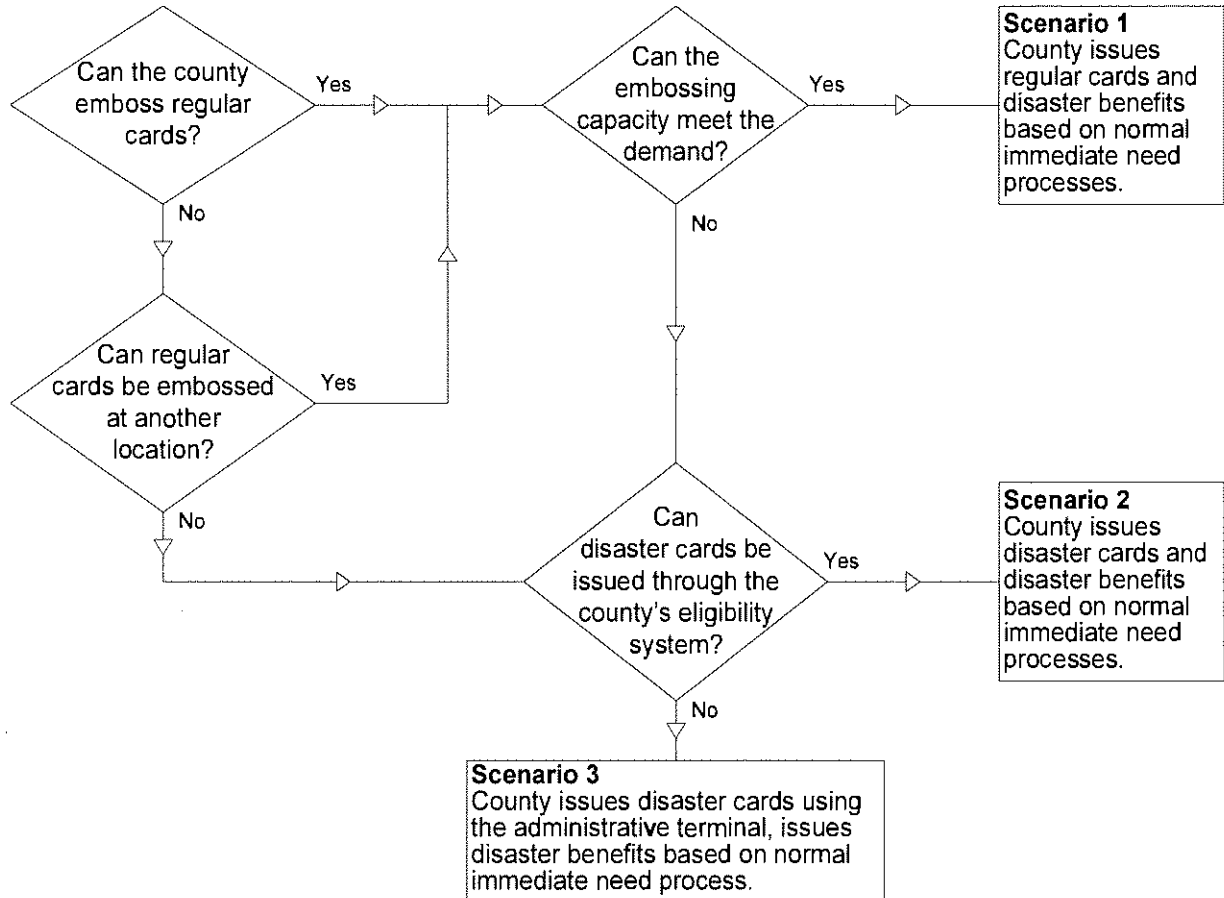
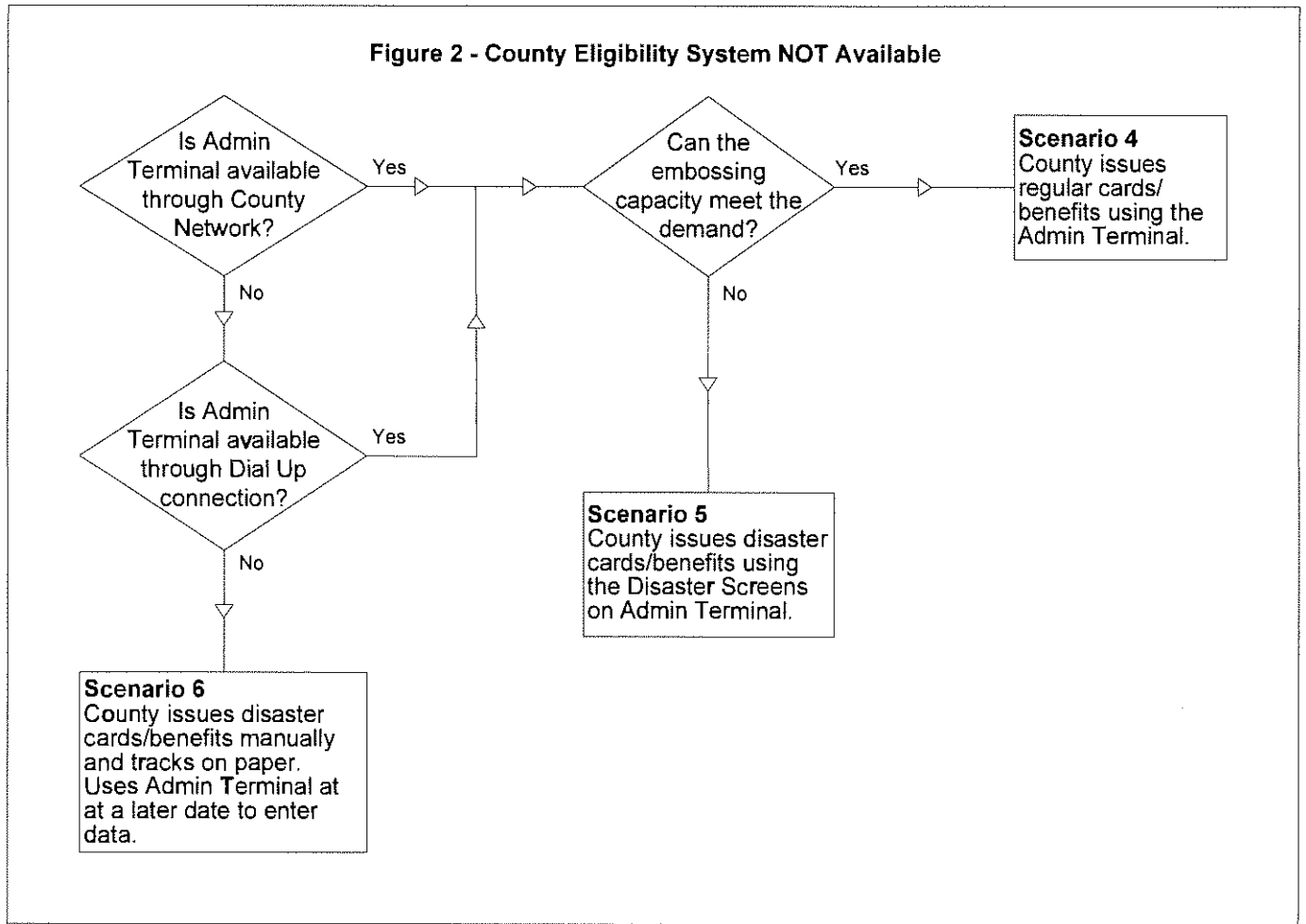


Figure 2 - County Eligibility System NOT Available



Enter case and benefit issuance information on eligibility system when it becomes available.

Client Setup and Card Issuance/Benefit Issuance Scenarios

Scenario 1: County issues regular cards and disaster benefits based on normal immediate need processes.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Use existing immediate need processes.	Use existing immediate need processes.	Use existing immediate need processes.
Required Activities		
<ul style="list-style-type: none"> • None 		
Process Considerations		
<ul style="list-style-type: none"> • None 		
Cross County Alternatives		
<ul style="list-style-type: none"> • Embossing cards to an embosser in another county 		

Scenario 2: County issues disaster cards and disaster benefits based on normal immediate need processes.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Use existing immediate need processes.	Issue Disaster Cards using eligibility system (either Batch or Host-to-Host).	Use existing immediate need processes.
Required Activities		
<ul style="list-style-type: none"> • Obtain pre-embossed Disaster Cards • Deploy Disaster Cards to issuance locations 		
Process Considerations		
<ul style="list-style-type: none"> • Disaster Card inventory control, storage, and security 		
Cross County Alternatives		
<ul style="list-style-type: none"> • None 		

Scenario 3: County issues disaster cards using the administrative terminal, issues disaster benefits based on normal immediate need process.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Use Eligibility System (preferable) or Administrative Terminal Disaster Screen	Issue Disaster Cards using Administrative Terminal Disaster Screen	Use existing immediate need processes.
Required Activities		
<ul style="list-style-type: none"> • Obtain pre-embossed Disaster Cards • Obtain Administrative Terminal Disaster User IDs • Deploy Disaster Cards to issuance locations 		
Process Considerations		
<ul style="list-style-type: none"> • Disaster Card inventory control, storage, and security • Administrative Terminal Disaster User ID control • Entering client and benefits that were created via the Administrative Terminal into the eligibility system 		
Cross County Alternatives		
<ul style="list-style-type: none"> • Staff augmentation for Disaster Card issuance 		

Scenario 4: County issues regular cards/benefits using the administrative terminal.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Use Administrative Terminal Client Set-up screens.	Use Administrative Terminal to issue OTC cards (embossed at local office).	Use Administrative Terminal.
Required Activities		
<ul style="list-style-type: none"> • None 		
Process Considerations		
<ul style="list-style-type: none"> • Assess need for additional county BOSS user IDs • Data entry once eligibility system is back on-line 		
Cross County Alternatives		
<ul style="list-style-type: none"> • Access administrative terminal from offices in other counties 		

Scenario 5: County issues Disaster cards/benefits using the Disaster screens on the administrative terminal.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Use Administrative Terminal Disaster Screens.	Issue Disaster Cards using Administrative Terminal Disaster Screens	Use Administrative Terminal.
Required Activities		
<ul style="list-style-type: none"> • Obtain pre-embossed Disaster Cards • Obtain Administrative Terminal Disaster User IDs • Deploy Disaster Cards to issuance locations 		
Process Considerations		
<ul style="list-style-type: none"> • Disaster card inventory control, storage, and security • Administrative Terminal Disaster User ID control • Data entry once eligibility system is back on-line • Determine if benefit issuance will be performed using normal county user IDs or using disaster IDs 		
Cross County Alternatives		
<ul style="list-style-type: none"> • Staff augmentation for Disaster Card issuance 		

Scenario 6: County issues Disaster cards/benefits manually and tracks on paper. Uses administrative terminal at a later date to enter data.		
Client Setup	Card Issuance/Replacement	Benefit Issuance
Manually track Client Setup data, enter into Administrative Terminal at a later time	Manually track Card Issuance/Replacement data, enter into Administrative Terminal at a later time	Manually track Benefit Issuance data, enter into Administrative Terminal at a later time
Required Activities		
<ul style="list-style-type: none"> • Obtain pre-embossed Disaster Cards • Obtain Administrative Terminal Disaster User IDs • Deploy Disaster Cards to issuance locations 		
Process Considerations		
<ul style="list-style-type: none"> • Worksheets to capture Client Setup, Card Issuance/Replacement, Benefit Issuance information • Location of Administrative Terminal entry • Disaster Card inventory control, storage, and security • Administrative Terminal Disaster User ID control • Data entry once eligibility system is back on-line • Off-line processes 		
Cross County Alternatives		
<ul style="list-style-type: none"> • Access administrative terminal from offices in other counties • Staff augmentation for Disaster Card issuance 		

Points to Consider

Points to Consider: Eligibility System Interface

- Can the CWD continue to use their standard EBT procedures?
 - Determine if the CWD's normal eligibility system interface with the EBT system is operational (damage assessment).
 - If the county eligibility system is unable to establish State Unique IDs (case numbers) for applicants or generate unique benefit authorization numbers during DFSP, the county must determine how case numbers and benefit authorization numbers will be created. This process can be developed in advance of a disaster or as part of a contingency plan (e.g., reserving a block of case numbers and benefit authorization numbers for DFSP use and consider having the numbers available on paper).
- Connectivity to the EBT system can be established using the county's network or arrangements can be made with neighboring counties to provide connectivity through that county's network. The CWD should determine if accessing the EBT system through a neighboring county's system is feasible. The CWD should also determine if accessing their eligibility system through a neighboring county (with the same SAWS consortium system) is feasible. The details for this arrangement can be a pre-disaster planning activity - consider how to implement, e.g., add to an interagency agreement or some other document, such as a Memorandum of Understanding. Dial-up connectivity directly to the EBT contractor is not available.
- Unless the eligibility system has been programmed to issue pre-embossed disaster cards, the Disaster Account Setup/Card Issuance Screen would be used to issue this type of card.
- Counties should strongly consider programming disaster food stamp rules (MPP Section 63-900) into their eligibility systems for faster processing of food stamp applications in the event of a large scale disaster.
- Each of the eligibility systems should analyze the Detailed System Design document and determine what changes are needed to incorporate features for EBT disaster support services. For example, changes may be necessary to accept an override of the food stamp stagger date, to incorporate the new benefit codes, or to accept the pre-embossed disaster card numbers.

Points to Consider: Early Release of Benefits for Existing Clients

- Evaluate whether this option is necessary. Depending on the date and the anticipated disaster duration, it may or may not be beneficial to override benefit stagger dates.
- Each eligibility system should determine whether or not system changes are needed to accept an override of the food stamp stagger date.
- If the CWD selects this option, the county should develop procedures to inform clients that food stamp benefits can be accessed on a specific date, e.g., use public service announcements.

Points to Consider: EBT Card Stock

Determine whether regular stock of EBT cards can be used:

- Is the necessary equipment operational (embosser, CAPS device, etc.)?
- Can regular EBT cards be embossed at other county locations or at a neighboring county's card embosser? (use cross county embossing procedures)
- Will the County be able to follow its normal issuance procedures for the DFSP benefit issuance or will new procedures be written for staff?
- Is additional card stock needed?

Points to Consider: Pre-embossed Disaster EBT Card

- Estimate the number of pre-embossed Disaster EBT cards needed.
- Discuss shipping location(s) for pre-embossed Disaster EBT card with the OSI-EBT Project Office.
- Each eligibility system should determine if any system changes are needed to accept the pre-embossed disaster EBT card numbers.

As a result of a disaster, the conditions of a community may be uncertain or not suitable for the county's normal method of issuance, therefore, the county should be aware of alternative methods to provide EBT cards to clients.

Points to Consider: Disaster EBT Card – Inventory Procedures

- Develop security measures for the storage, handling and distribution of the cards. Since a disaster can occur anywhere in a county, a county should be aware of alternative secure storage locations.
- Develop procedures for reconciliation and control of the cards. Inventory procedures should include:
 - Disaster EBT Card Inventory Control - EBT cards that are received
 - Disaster EBT Card Return - At the end of the disaster or within a predetermined time frame, counties should coordinate the return of the unused inventory with the OSI-EBT Project Office.

Points to Consider: Client Training Material

- Does the CWD have a supply of EBT training brochures/material for DFSP clients?
- Does information in the existing client training material need to be modified for DFSP? What about language translations of material? Can information be provided in a flyer or included with other disaster material the CWD is producing? An example of this is informing recipients who receive a replacement card to use their existing PIN and not to use the PIN provided on their pre-embossed Disaster EBT card mailer.
- How will client training material be distributed to clients, e.g., provided at the same time as the application, when clients receive their EBT cards, etc.?