

# Operations Memorandum - SNAP OPS100501

May 13, 2010

**SUBJECT:** EBT Security Guidelines  
**TO:** Executive Directors  
**FROM:** Joanne Glover, Director, Bureau of Operations

## Purpose

To provide guidance and direction regarding EBT Security to include System Access, Card Inventory, and Card Issuance and to ensure that all staff complete the online EBT security e-learning once posted.

## Background/Discussion

### **EBT ACCESS & AUTHORIZATION CONTROL PROCEDURES**

The purpose of this procedure is to ensure compliance with Federal Regulation 7CFR274.12(h)(3) and 277.18(p) regarding EBT System Security. Adherence to these procedures is mandatory.

### EBT SYSTEM ACCESS

- No individuals may have dual access to the Caps Pin process and Card Creation process.
- CAOs are to ensure that coverage is available until 5:00 pm each business day for both Pinners and Card Makers. Please note: Access is limited to five Pinners and five Card Makers per CAO/District Office. (If additional staff is needed, the request must be approved by Joanne Glover, Director of Operations.)
- Operators should not share passwords or write them down.
- The person whose password is utilized for EBT transactions will be held accountable should any discrepancies be discovered upon reviews by OIG and/or CAO management.
- All persons removed from EBT duties should have their EBT System Access terminated immediately by the CAO EBT Coordinator who must

submit a deletion request form to the OIM EBT Security Administrator, via email, at [PW, EBT Inquiries](#)

All users should log off if not processing EBT transactions.

## **WEB**

### **New Users, Deletions, Changes:**

Request forms for access, deletions, or changes are completed by CAO EBT Coordinator.

- These forms must be submitted to the OIM EBT Security Administrator, via e-mail, at [PW, EBT Inquiries](#)
- Passwords are provided to the CAO EBT Coordinator by the OIM EBT Security Administrator.
- Non access by user in 90 days will result in LOCK OUT.

Non access by user in 300 days results in system purge

## **PASSWORD RESETS**

- All Card Maker RESETS are to be submitted to the OIM EBT Security Administrator via e-mail at [PW, EBT Inquiries](#), please include your name and EBT user signon information.
- All Pinning RESETS are to be called in to the Vendor Pinning Hotline at 1-866-607-7734

**(Philadelphia and Pittsburgh CAOs are authorized to handle their own Card Maker resets)**

## **Database Reconciliation of users - WEB and CAPS:**

- On a quarterly basis, Vendor Security will send a list of all EBT USERS to the Vendor Project Officer and OIM EBT Security Administrator.
- Card Makers (WEB BROWSER Users) will be identified by name and card maker ID.
- Pinners (CAPS Users) will be identified by name, Agent ID #, and county code.

- The OIM EBT Security Administrator will provide each CAO EBT Coordinator and other appropriate parties with the list specific to the requesting entity for review.
- CAOs will take appropriate action to remove any EBT users who no longer require access by submitting a deletion form to the OIM EBT Security Administrator, via email to [PW, EBT Inquiries](#)
- The OIM EBT Security Administrator will submit deletions to Vendor Security.

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### **CARD INVENTORY CONTROL PROCEDURES**

- The Executive Director must appoint an EBT Coordinator and EBT Alternate to be responsible for card inventory control procedures.
- Upon receipt of an EBT card shipment by the CAO the shipping container should only be opened by designated personnel.
- A physical inventory must be conducted by the EBT Coordinator or EBT Alternate and compared to the shipping manifest.
- Cards are to be kept in a secure locked location and the key must be kept in a separate secured location by EBT Coordinator or EBT Alternate.

- Any discrepancies are to be reported to the Executive Director for review and they will contact the EBT Project Coordinator, immediately.
- Each CAO will maintain a written log to track inventory and validate card production. The logs must be maintained for 4 years. After 4 years from the date of the log, it must be destroyed by shredding it. All EBT logs can be found on DocuShare in the EBT folder.
- At the end of the day all unused cards are to be placed in a secure locked location and the key must be kept in a separate secured location by the EBT Coordinator or EBT Alternate. Reconciliation of cards issued must be completed by the designated EBT Coordinator or EBT Alternate.

### **DAILY CARD INVENTORY**

- All offices will maintain an EBT Card Reconciliation Log/Tracking Slip which must be maintained by the EBT Coordinator or EBT Alternate. This inventory log must be kept for four years from the date of the log. After the four years, the log is to be shredded.
- It is Mandatory to complete the EBT Card Reconciliation Log/Tracking Slip.

### **DAILY CARD ISSUANCE REPORT FORM**

- Each locally issued Access Card must be accounted for by EBT Coordinator or EBT Alternate.
- The Operator must complete an EBT Issuance Log for all cards issued locally. The log must be kept for 4 years from the date of the log and then shred it.

### **ADDITIONAL SECURITY ISSUES**

- Damaged cards must be destroyed via shredder.
- Damaged cards must be logged on an EBT Card Destruction Log. This log must be kept for four years from the date of the log and then shredded.
- Used Printer Ribbons and Cartridges are to be shredded. Ribbons must be removed from the plastic casings prior to shredding. The plastic casing can be thrown away. Logs must be retained for at least four (4) years from the date of the log and then shredded.

### **CARD ISSUANCE**

- Cards should be issued centrally except for Expedited SNAP benefits, initial cards, an emergency situation or the card is damaged.
- A log must be maintained for all EBT locally issued cards.

### **Over the Counter:**

- Cards may not be made without the client present in the office.
- Identification must be verified (CAEH 120.0 FSH 520.3).
- Apply appropriate card replacement fees (CAEH 180.74).

### **Central Card:**

- Clients must contact the CAO to request a replacement card.
- Validate the client's home address prior to initiating card production.
- Apply appropriate card replacement fees (CAEH 180.74).

### **CAPS Device:**

- Both the primary and back-up device should be kept in a secure locked location when not in use. The CAO must designate a staff member to maintain a separate secured location for the key.

### **RESPONSIBILITIES**

The Executive Director must designate an EBT Coordinator and EBT Alternate. The EBT Coordinator and Alternate are responsible to:

- Order cards and other EBT supplies
- Sign for supplies
- Be responsible to ensure supplies are kept in a secured place
- Reconcile card supplies daily
- Ensure all logs are maintained daily, and shredded after the designated time period
- Have knowledge of the location of all logs
- Keep current lists of who has access to EBT cards

- Ensure that all staff members are asking for ID when pinning a card
- Ensure that the cards and CAPS device are kept in a secured, locked location during non-work hours.
- Ensure that all staff are aware of protecting their password

## **MONITORING**

The Bureau of Program Evaluation will conduct on-site reviews to comply with the EBT security procedures. Reviews can be announced or unannounced. Quality Control (QC) will conduct pre-arranged on-site EBT reviews in conjunction with the monthly QC random sample SNAP eligibility client interviews completed by QC in the CAO offices. The Division of Corrective Action will make random unannounced visits as part of other on-site reviews. The review will be conducted by office observation and staff interview.

If any deficiencies are noted in the EBT review, the CAO will receive an EBT Review Findings Memo. Findings will be discussed and finalized at the Error Review Committee Meetings and CAOs will be requested to provide a corrective action response to the Area Manager with a copy of the plan to the Division of Corrective Action (DCA) for all final findings. DCA and DQC staff will be responsible for the monitoring the CAOs implementation of the corrective action plan.

BPE will assign and track the reviews to ensure all CAOs are visited for an EBT review once every year.

## **NEXT STEPS**

1. This OPS MEMO is effective immediately.
2. Share this information with all staff.
3. Direct questions to your Area Manager.