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Executive Office of Health and Human Services
Department of Transitional Assistance
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Operations Memo 2013-57-A
November 25, 2013

To: Department of Transitional Assistance Staff

From: Lydia Conley, Acting Assistant Commissioner for Policy, Program and External Relations

Re: TAFDC, EAEDC and SNAP: Photo EBT Card Procedures

Overview

Chapter 65 of the Acts of 2013 requires that certain EBT cardholders be issued EBT cards with photographic images. The Department has begun implementation of this law. Operations Memo 2013-55 advised DTA staff about this change as well as a mailing to all clients impacted by this change.

Purpose of Memo This Operations Memo outlines the systems changes and automations effective with BEACON Build 45.9 scheduled for November 25, 2013 and:

- advises staff about the new Photo EBT card requirements and exceptions to the requirement;
- explains the types of photos available in BEACON;
- advises staff of their responsibilities; and
- provides procedures for cardholders with exception to the photo EBT card requirement.

Operations Memo 2013-58-A details the technical procedures for Photo and non-Photo EBT card issuance.

This Operations Memo is being reissued to clarify instructions in the “Photo EBT Cards Automated EBT Appointments” and “Photo EBT Requirement” sections.

Photo EBT Requirement

State law requires the use of photo identification on the front of newly issued and reissued EBT cards. Certain cardholders are specifically excepted from this requirement. For all required cardholders, existing EBT cards are in the process of being replaced with new Photo EBT cards. There is no replacement fee associated for the initial issuance of a Photo EBT card. Subsequent requests are subject to the replacement card processes outlined in Operations Memos 2012-56 and 2013-16.

The law makes exception to the photo EBT requirement for cardholders who are:

- age 18 and under;
- age 60 or over;
- blind;
- disabled; or
- victims of domestic violence.

If a client or applicant (hereafter referred to as client) is excepted, any new or replacement EBT card issued to the client will have the “VALID WITHOUT PHOTO” image printed on the card as long as the exception continues to apply. All current and ongoing cardholders determined to have an exception can continue to use their current EBT Card. If a client who meets one or more of the above exceptions receives a Photo EBT card directly, the cardholder may request a replacement “Valid Without Photo” EBT card replacement at any time, and without the \$5 fee. This applies to any client who is excepted in the future, i.e., turns age 60, becomes disabled or victim of domestic violence.

Note: Authorized Representatives, Authorized Payees and Authorized Representatives/Agencies will continue to use their current EBT Cards. Any new or replaced EBT card issued to such individuals will have “VALID WITHOUT PHOTO” image printed on the card.

Along with clients coded as being in a Domestic Violence situation, clients who have been coded with a Heightened Level of Security (HLS) will automatically be granted an exception under the domestic violence category. Additionally, clients who do not wish to have their photo taken due to sincerely held religious beliefs, as protected under law, will be allowed to have a non-Photo EBT card.

Cardholders who have a temporary identification number in the SSN field are ineligible for a Photo EBT card. Mandatory clients will have a photo taken, but it will be marked Questionable until such clients obtain a valid Social Security Number (SSN). Their Photo EBT requirement will be automatically redetermined upon the SSN update.

All current and ongoing cardholders determined to be subject to the Photo EBT requirement will have their current EBT card replaced with a Photo EBT card.

Types of Photos The Department has entered into an agreement with the Registry of Motor Vehicles (RMV) to obtain photo images of clients. Under this agreement, DTA uses the client's SSN to obtain the most current State-issued driver's license or identification card image. Using a monthly batch and real-time web service, RMV will return the latest photo image for each grantee.

RMV Photo Conversion

Once the photo is received by BEACON, a five-point data field match is performed to compare the:

- SSN;
- First Name;
- Last Name;
- Gender; and
- Date of Birth

stored in BEACON with the data on file with the RMV. For any photo where there is an exact match between RMV and DTA on the five data fields, DTA will designate an available RMV image in BEACON as a *DTA Photo* image. Only images marked as a *DTA Photo* will be available for use in the Photo EBT card process.

DTA Photo

If the match is not exact on all five fields, a record will appear on the new External Match/Identity Match view. This match will be managed and dispositioned by case managers. The case manager will make a determination to either Accept the RMV image as a *DTA Photo* or Ignore the RMV photo to disposition the match. Where there is an Identity Match, the case manager should attempt to resolve the match prior to scheduling an appointment. Procedures for issuing an EBT card in these instances are outlined further below.

Clients who are required to have a Photo EBT card must have a photo taken unless the data discrepancy can be resolved by the case manager.

Note: Prior to the conversion process, a one-time centralized review of cases with discrepant DTA-RMV data was undertaken to determine if any of the data mismatches could be resolved. Those that could be resolved had their RMV image designated as a *DTA Photo* so that the photo would be available for use in the Photo EBT card process.

Clients whose discrepant data requires further review by a case manager will appear on the new Identity Match view. Clients on the Identity Match view, for whom the discrepancy cannot immediately be resolved by the case manager, must have a photo taken.

**EBT
Replacement
Process**
*Bulk Photo EBT
Replacement*

On October 23rd, cardholders who are required to have a Photo EBT card were sent an informational notice advising them of this requirement. The mailing was sent to Mandatory cardholders using the information available in BEACON as of October 9th. These clients received one of two notices:

- New Photo EBT Card Requirement – Photo on File; or
- New Photo EBT Card Requirement – Appointment Needed.

Those clients with a *DTA Photo* received the New Photo EBT Card Requirement – Photo on File notice advising them that their RMV image will be used on their new Photo EBT card.

The Department has begun mailing replacement Photo EBT cards based on the last digit of the cardholder's SSN. **The existing PIN will be valid unless the household chooses to switch the PIN.** For this bulk mailing, the Photo EBT Card Carrier advises clients of the scheduled deactivation of their current EBT card and the activation of their new Photo EBT card. The EBT Brochure will be included in the mailing. Mandatory cardholders added between October 9th and November 8th who have an available *DTA Photo* will also be included in the bulk replacement process.

These clients will have their current EBT card deactivated at 11:59 PM of the day prior to their December benefit date. The account associated with the new Photo EBT card will be activated on their December benefit date. For example, a client whose SSN ends in "7" will have his or her current EBT card deactivated at 11:59 PM on December 10th and have their new Photo EBT card activated at 12:00 AM on December 11th.

Note: A new EBT replacement type has been added to BEACON. These replacements are part of a Central Print Request and have the new replacement reason of "Photo Needed – Bulk Request". They will **not** be subject to the \$5.00 fee replacement/fee.

New and replacement Photo and non-Photo EBT cards that are centrally issued will include the same inserts. After the initial bulk mailing, the Photo EBT Card Carrier will not include the information specific to the mass deactivation and activation of cards.

**Photo EBT
Cards**
Automated EBT
Appointments

Beginning November 25th, all Mandatory cardholders who were active as of November 22nd, without a *DTA Photo*, will be automatically scheduled and centrally issued an appointment letter to have their photo taken. Those clients due for a redetermination or reevaluation in January or February 2014 will **not** be part of this scheduling. The system-generated appointments will be scheduled Monday through Thursday. A new appointment letter type, EBT Photo Card, has been added to BEACON. The letter includes each TAO's dedicated phone line for questions or concerns client may have in regards to the Photo EBT requirement (Attachment A).

Any Mandatory cardholders who became active or pending between November 12th and 22nd who have a *DTA Photo* **will** be included in the automatic appointment process. This process also applies to those clients who have an Identity Match as a result of the RMV to DTA Photo Conversion process.

In an effort to minimize in-office traffic, case managers should contact these clients by phone to determine if they would prefer that the replacement card be mailed to them or to receive an automatically scheduled in-office appointment to get one. Case managers must advise clients that once the replacement card is issued, their existing EBT card will become deactivated **immediately**. If a client wishes to have their Photo EBT card mailed, the case manager must document the request in the Narrative tab. If the client cannot be reached, the EBT Photo Card appointment will be automatically scheduled. This must be done to ensure client benefit access.

Recertifications
and
Reevaluations

Mandatory clients who were added to BEACON after November 22nd will not be part of the automatic scheduling. These clients will require the case manager to manually send an EBT Photo Card appointment. If there is a *DTA Photo* available, the case manager may contact the client by phone, following the same procedures as above to ensure client benefit access.

Appointments will be scheduled for the client's assigned TAO with the following exception. All clients assigned to Dudley Square TAO will have their automatic appointments scheduled at the Newmarket Square TAO. Manually scheduled appointments by Dudley Square staff **will** default to Dudley Square, however an alternate TAO may be selected, The Malden Centralized SSI, Fall River Centralized TAFDC and the Central Eligibility Units are excluded and additional procedures regarding these clients will be forthcoming from Field Operations.

**Photo EBT
Cards
(continued)
Recertifications
and
Reevaluations**

Note: A client requesting an EBT card at any TAO, regardless of where his/her case is assigned or his/her EBT Photo Card appointment is scheduled, must be issued a card in accordance with current procedures.

Important: Mandatory cardholders due for recertification or reevaluation after November 25th, who do not have a *DTA Photo*, must be scheduled for an in-office appointment to complete their interview and have their Photo EBT card issued.

The reevaluation and recertification processes now include cooperation with the Photo EBT card process for Mandatory clients. Clients who fail to complete their recertification or reevaluation must be closed following current procedures. Clients who have an available *DTA Photo* but have not yet received a Photo EBT card must be offered the same options as the clients listed above to have the new card mailed or to go to their TAO. This process must be followed in order to ensure client benefit access.

**Manual EBT
Appointments**

If a client misses his or her scheduled EBT Photo Card appointment, a second appointment must be manually scheduled. TAO staff will schedule a follow-up appointment using the Schedule Appointment page in BEACON by selecting the EBT Photo Card type. When possible, manually-scheduled EBT Photo Card Appointments should be set for Fridays to avoid the influx of system-scheduled client appointments.

Note: Cases **must not be closed** for failing to appear for their scheduled EBT Photo Card appointment.

**Photo EBT
Cards- No DTA
Photo
Manual EBT
Appointments
(continued)**

If a client contacts the TAO and states that s/he has difficulty making the appointment, the case manager must explore if the client has any exception to the EBT photo card (listed on page 2) requirement. If no exception exists, the appointment must be rescheduled at a time or location that is more convenient for the client.

Clients who have an Identity Match that cannot be resolved through information in the case record or available by data sources must be issued a VC-1 for the outstanding mandatory verification.

Important: Cases must not be centrally issued a replacement card without client contact. Clients who cannot be reached must be scheduled for an EBT Photo Card appointment. This process must be followed in order to ensure client benefit access.

If a Mandatory client needs a new or replacement EBT card and a Photo EBT card cannot be issued, a non-Photo EBT card must be provided. The issuance of an EBT card **must** not be delayed. Case managers are reminded of the requirement to screen for expedited service for all SNAP applicants and to immediately provide an EBT card for those who qualify.

**Pending
Applications**

All pending applicants, who are not currently active in another DTA program, who require or wish to have a Photo EBT card and do not have a *DTA Photo* on file, must have their photo taken at a local TAO. This image will be marked as Questionable until the case is approved and a non-Photo EBT card will be issued. The TAO will follow the procedures below to ensure that the Mandatory client gets a photo taken and receives a Photo EBT card.

Those clients whose application is assigned to the Web Units and who are required or wish to have a Photo EBT card, but cannot be issued one, will appear on the Temporary EBT Card Issued view for the local TAO to which they are transferred to upon approval. The TAO will follow the procedures below to ensure that the Mandatory client gets a photo taken and receives a Photo EBT card.

BEACON Changes

Some additional changes have made to assist staff in identifying which clients are required to have a Photo EBT card and have not been issued one.

Electronic Case Folder (ECF)/Workflow tab:

When opening an ECF for a Mandatory cardholder for whom an EBT Request has not been created, the following message will be displayed: “The client is now mandated to have an EBT Card with a Photo. Please create a New/Replacement Primary EBT Card Request.”

If the client does not have a *DTA Photo*, an empty photo box will be displayed with the message “NO DTA PHOTO AVAILABLE.”

If client has a *DTA Photo*, the client’s photo will be displayed in the photo box on the tab.

Changes to Case Manager Views:

A new column, *DTA Photo*, has been added to the following views to indicate which clients need a Photo EBT Card and the *DTA Photo* status in BEACON:

- Pending Applications/Reinstatements
- Active by Grantee
- Active by Program
- Reevaluation Due
- Reevaluation Due - Interim Report

The EBT Photo Card column displays a value for a case when a client:

- has an EBT Card Request that is Pending/Pending Approval with an Override Reason of “Opt-In” or the client is considered Photo Mandatory according to policy;
 - does not have a “Completed” EBT Card Request with Replacement Reason of “Photo Needed - Bulk Request” and
 - does not have a “Completed” EBT Card Request where the Complete Date is after November 25th.
-

**BEACON
Changes
(Continued)**

The values of the EBT Photo Card column are:

- Blank – not required;
- Create – does not have a Pending/Pending Approval card request; and
- Pending – already has a Pending/Pending Approval card request that needs to be authorized.

The *DTA Photo* column is populated only when the EBT Photo Card column has a value of either Create or Pending. The *DTA Photo* column will display one of the following values:

- Blank – if the value in the EBT Photo Card column is blank;
- Available – if the client has a *DTA Photo*;
- Resolve Match – if the client has an associated RMV Photo and there is an Identity Match to disposition; and
- Take Photo – if client has no *DTA Photo*.

These views will assist staff in determining which clients due for a recertification or reevaluation are Photo EBT required and need an in-office appointment scheduled to complete their review and be issued a Photo EBT card.

The RFA Signature page has been updated to include additional fields under the Request primary EBT card checkbox.

BEACON will determine whether or not the client is required to have a Photo EBT card based on the information entered thus far, and will display one of the following system-determined values in the Photo field:

- Mandatory;
- Exception - Domestic Violence;
- Exception – Disabled;
- Exception - Older than 59; or
- Exception - Younger than 19

The case manager can override this default determination for clients and applicants known to BEACON by selecting an Override Reason from the Override field drop-down list. If the Photo status is Mandatory, then the selectable Override field values are:

- Opt-Out: Federally Defined Religious Exemption;
 - Opt-Out: Disabled - for clients whose Disability Indicator is not Yes on the Disability page; or
 - Opt-Out: Safety Concern- for clients who Domestic Violence or HLS Indicator is not Yes on the Domestic Violence Page.
-

**BEACON
Changes
(Continued)**

If the Photo status is an Exception, then the selectable Override field value is:

- Opt-In.

Only those with a clearance of case manager or higher can select an Override Reason.

Additionally, the same fields and options have been added to the EBT Card Request - Request tab and the EBT Card Detail page.

A new Appointments to Schedule/ Temporary EBT Card Issued view has been added. If a Mandatory cardholder is issued a non-Photo EBT card, the client will be tracked on this view until a Photo EBT card is issued or are no longer Photo EBT required.

If a Photo EBT card has been issued but is no longer required (for example, an individual becomes age 60, becomes disabled or a victim of DV), the case manager may issue a VALID WITHOUT PHOTO card at any time at the request of the recipient.

Photo Page

A new Photo page has been created. This page is accessible from the Client Search, Assessed Person – RFA, Assessed Person - AU Composition pages. It is also accessible from the EBT Card Request/Photo & Signature tab and EBT Detail view. On the Client Search page, a new photo icon directly opens the Photo page for the selected client.

On the Assessed Person - RFA and the Assessed Person - AU Composition, a new group *DTA Photo* has been added. This group will display the current photo image(s), basic identifying information available for a grantee and allow access to the Photo page.

If no *DTA Photo* is available then a “NO DTA PHOTO AVAILABLE” image will display. The pop-up icon next to the image box will launch the Photo page for the cardholder. The Photo page will be used to view all photo images available for the client. The *DTA Photo* will always be the Primary photo of record.

Starting with BEACON release 45.9, the BEACON application will be able to take and store a client’s photo. Once a photo is taken, if there is no Identity Match, and the case is active, this image will become the *DTA Photo*. If the case is pending or the client has a temporary identification number in the SSN field, then the photo will be marked as Questionable until approved and/or a valid SSN is provided and verified.

**BEACON
Changes
(Continued)**

The following checkboxes/buttons will be available based upon the staff's role and workflow step in which the page is accessed:

- DTA [Photo ID: 9999999]: Will display the unique internal Photo Id assigned to each photo stored in BEACON
- Select Photo: Will allow the user to change the Primary photo designation from one *DTA Photo* to another *DTA Photo*.
- Primary Indicator: This will always be disabled. This automatically defaults to the Primary *DTA Photo*.
- Questionable Indicator: Automatically set for a *DTA Photo* where there is an Identity Match. If an RMV Image is accepted then the Indicator will be removed. If Ignore RMV Image is selected, then a pop-up question will allow the user to choose whether to remove the Questionable Indicator. This will also be set for pending applicants who have their picture taken at the TAO. The indicator will be enabled. The Indicator should be removed by the user after the identity of the client is verified.
- Take Photo: Will allow an authorized user access to the Take Photo page.
- Save: Will allow a user to save the photo taken on the Take Photo page.
- Resolve Match: Enabled if an Identity Match exists. Selecting the button will open the Identity Match page to resolve the data discrepancy between DTA's and RMV's personal identity information and Ignore or Accept the image over as a *DTA Photo*.
- Show History: Will show all photo images taken or received for the client, sorted by the date the image became available in BEACON, newest to oldest.
- Print: Available for Program Integrity and the Fraud Investigation and Data Match (FIDM) Unit staff only. Will print all available images that have been taken or received for the client.

*Case Manager
Responsibilities*

Identity Match Page

The Identity Match page displays a match record when the five data points of SSN, First Name, Last Name, Gender and/or Date of Birth are not an exact match between DTA- RMV interface. If no RMV data exists, no record will be displayed.

The page displays both the BEACON and RMV data for a side-by-side comparison. The page also displays the latest result of the SSA/SVES match performed with BEACON demographic data.

The Identity Match needs to be dispositioned by the case manager before a Photo EBT card can be created. A photo should be taken of a client who appears on the Identity Match view.

**BEACON
Changes
Case Manager
Responsibilities
(Continued)**

However, a hard edit will prevent either photo from being used to issue a Photo EBT card until the match is dispositioned and is deemed no longer Questionable. If a card is needed prior to the disposition, a card must be printed with the “VALID WITHOUT PHOTO.”

Important: If the client’s information needs to be corrected or updated, the Assessed Person window should be amended accordingly. If a name is verified as an alternative name, such as a birth name or a married name, the alternative name must be entered as such. Similarly if an alternative SSN exists, it should be entered in the Alternate SSN field. The Primary Name and SSN in BEACON must match what has been verified by the SSA/SVES match in order to prevent erroneous mismatches from generating.

The case manager must review each discrepant field and verify that the case record information is accurate. If the case manager cannot make a determination, a VC-1 must be issued for the outstanding information in question if the case manager cannot otherwise verify the discrepant information through the case record or data sources. The case manager must take one of the following actions:

- Accept RMV Photo: this Action will copy the RMV image over as a *DTA Photo*. This should be selected when the case manager has determined that identity has been verified.
- Ignore RMV Photo: When a user selects this action, the RMV photo will be ignored.

If any of the discrepant information provided in this page cannot be resolved, Ignore RMV Photo **must** be selected. Selecting the Referral checkbox will generate a referral to the FIDM Unit for further review. A system-generated narrative indicating that the referral was made will appear in the Narrative tab.

Once an RMV Photo is marked as Ignore, the case manager can decide to leave the box checked as Questionable in which case a non-Photo EBT will be issued. The case manager may uncheck the “Questionable” box in which case a *DTA Photo* must be taken and a Photo EBT card will be issued.

Once an Action is selected and saved, the match will be dispositioned and will no longer appear on the Identity Match view.

Note: If an SSA/SVES response has not yet been received for the BEACON data, but a five-point match with the RMV is obtained, then the RMV Photo will be accepted as a *DTA Photo*.

If a *DTA Photo* is already available and “Accept RMV Photo” is selected, then a warning (Yes/No) image will appear. The following will be displayed:

**BEACON
Changes
Case Manager
Responsibilities
(Continued)**

“A DTA Photo is already available for the client. If you select ‘Accept RMV Photo’ then the RMV photo will become the new DTA Photo. Do you wish to continue?”

If Yes is selected, upon saving the page, the RMV photo will be copied over as a *DTA Photo*. If No is selected, the Action will be cancelled.

**Photo EBT
Requirement
Exceptions**

Changes to data on the following pages will result in a redetermination of the Photo Mandatory or Photo Exception status.

- **Domestic Violence** - When the page is saved, if the cardholder has been identified as Yes for Domestic Violence situation or the HLS checkbox has been selected, BEACON will set the photo status of the Pending Primary EBT Card request to *Exception – Domestic Violence*. Similarly, if the client is no longer experiencing domestic violence and the client is identified as No or the HLS box is unchecked, BEACON will set the photo status of the Pending Primary EBT Card request to Photo Mandatory, if the cardholder is not otherwise identified as having an Exception.
 - **Disabled** - When the page is saved, if the cardholder is identified as Yes Disabled in accordance with their program’s established criteria, BEACON will set the photo status of the Pending Primary EBT Card request to *Exception – Disabled*. Similarly, if the client identified as No, not Disabled, BEACON will set the photo status of the Pending Primary EBT Card request to Photo Mandatory, if the cardholder is not otherwise identified as having an Exception.
 - **EBT Card Detail** - When the page is opened, BEACON will check if the age of the cardholder is under 19 or over 59. If either applies, BEACON will set the photo status of the Pending Primary EBT Card to either *Exception - Younger than 19* or *Exception - Older than 59* respectively. Similarly, if the cardholder’s age were between 19 and 59, BEACON would set the photo status of the Pending Primary EBT Card to Mandatory, if the cardholder is not otherwise identified as having an Exception.
Note: If the Pending Primary EBT Card Request has an Override reason already set by the case manager, then BEACON will not automatically change the Photo Mandatory/Exception status. To remove an Override reason, open the Override dropdown list and select the blank value. A new Mandatory/Exception Status will be redetermined when the page is saved.
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**Photo EBT
Requirement
(continued)**

*Opt-Out and Opt-
In Procedures*

Clients who feel unsafe may request an Exception due to Domestic Violence in one of three ways. The client may have:

- the Yes indicator selected on the Domestic Violence page, as applicable; and/or
- HLS checkbox marked on the Domestic Violence page, as applicable; and/or
- the *Opt-Out: Safety Concern Override* reason selected on the EBT Card Detail page.

For clients seeking an exception for Domestic Violence, a referral must be made to the TAO's Domestic Violence Specialist, according to established procedures.

Important: A client need not have HLS status to claim an exception based on Domestic Violence.

Clients must not be asked to provide verification of their safety concern, nor should clients be required to meet with a Department Domestic Violence Specialist. Case managers must update the Narrative tab to reflect the reason for the request and any referrals that were made.

Note: Heightened Level of Security significantly limits a client's means of access to Department staff and case information. Clients must be advised of these limitations and consent to them *in writing*. See Operations Memo 2010-50 for more information.

Clients with disabilities may qualify for an exception in one of two ways: First, if the client's Disability page indicates that the person has already been determined disabled under the established criteria for the applicable program, that client is automatically excepted from the Photo EBT requirement.

The Yes indicator should only be selected on the Disability page for clients who meet the established criteria for Disability for their applicable program.

Second, clients with disabilities who have the No indicator on the Disability page must have the *Opt-Out: Disability Override* reason selected on the EBT Card Detail page. Clients must not be asked to provide verification of their disability. Case managers should inquire if the client otherwise needs assistance as afforded under the Americans with Disabilities Act, and the update the Narrative tab as appropriate.

**Photo EBT
Requirement
(continued)
Opt-Out and Opt-
In Procedures**

Clients who request not to have a Photo EBT card due to a sincerely held religious belief must have the *Opt-Out: Federally Defined Religious Exemption* Override reason selected. Clients must sign under penalties of perjury the new *Religious Exemption* form (Attachment B) which will be available online. This form should be used for the client to attest that he or she objects to having their photo taken due to his or her sincerely held religious belief. This Opt-Out is not provided for under the Photo EBT statute and refers to protection afforded under federal law. Case managers must update the Narrative tab to reflect the reason for the request is a sincerely held religious belief.

Note: If a client who has been determined to have an Exception requests to have a Photo EBT card, the case manager must select the Opt-In Override reason. The Narrative tab must be updated to document the request. There is no fee the first time a Photo EBT card is issued to a non-Mandatory cardholder.

**Facial
Recognition**

In its ongoing effort to maintain program integrity, the Department will be implementing a process with the Massachusetts State Police (MSP) that utilizes facial recognition software to analyze *DTA Photos* and RMV images.

Trained, dedicated MSP staff will manually refine the match results and report back to the FIDM Unit, for follow up as needed.

**Photo and Non-
Photo EBT Card
Issuance**

Operations Memo 2013-58 details the process for printing Photo and Non-Photo EBT cards.

**Client Access
Reminder**

Under federal regulation, every SNAP household member as well as any authorized person has the right to access a household's SNAP benefits using the head of household's EBT card.

**Client Access
Reminder
(continued)**

U. S. Food and Nutrition Service (FNS) authorized stores cannot prevent the use of the EBT card for accessing SNAP benefits by any member of the household, regardless of whether that person's photo is pictured on the card. If a client reports that the usage of the card has been limited, denied or otherwise treated differently than other customers by a store, the case manager must report all of the following to the Policy Hotline:

- client name
- client contact information;
- name of retailer
- location of retailer
- date and approximate time of the incident
- brief description of the incident

as available from the client. Central Office staff will follow up with the retailer and FNS accordingly.

The Department has been conducting outreach to retailers and community partners about this initiative.

Some individuals, particularly those who are homeless, may not have an acceptable form of identification available. Clients requesting or requiring a Photo or non-Photo EBT card, who do not have identification with them, may request a case manager to identify them in-person. Staff must continue to assist in this process according to current procedures.

**Dedicated TAO
Phone Lines**

Each TAO has had a dedicated phone line established in order to ensure that client questions and needs may be met through this transition. TAOs have been provided with procedures for managing this temporary process.

**Centrally Issued
Card Processing**

Photo and non-Photo EBT cards that are printed centrally and cannot be delivered will continue to be returned to the Benefit Issuance Unit according to current procedures. TAO staff will be alerted of clients who need follow up to ensure benefit access. Special instruction will be issued from Field Operations.

Job Aid

A Job Aid detailing the new EBT card process will be available on DTA Online on the Training page under Job Aids/Desk Guides.

Obsolete Memo

This Operations Memo obsoletes Operations Memo 2013-57.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline.

Attachment A

Photo EBT Appointment

Dear Mary Smith:

State law requires most DTA clients to have their picture on their Electronic Benefits Transfer (EBT) card. We have scheduled an appointment for you to come in to have your picture taken and put on your card. There is no fee for this card.

Your appointment is scheduled for:

Framingham TAO-DTA

75 Fountain Street Framingham, MA 01702

Monday, 10/07/2013, 9:00 AM

Please bring identification with you to your appointment. Types of identification that you can bring include, but are not limited to, your birth certificate, court records, Social Security card or other official government documents.

Exceptions to Photo EBT card. You do not need a Photo EBT card if you are:

- age 18 and under
- age 60 or over
- blind
- disabled, or
- a victim of domestic violence

If you believe one of these exceptions applies to you, or if you have any questions, call your office at (508) 555-5555.

Attachment B



Massachusetts Department of Transitional Assistance
Religious Exemption Certification Statement

The law provides that certain clients of benefits administered by the Department of Transitional Assistance are required to have their photograph on their Electronic Benefit Transfer card.

I _____, certify that due to my sincerely held religious beliefs, I object to having my photograph taken.

Signed under the penalties of perjury.

Client Signature

Date

Case Manager Signature

Date