

POLICY MANUAL

4. FOOD DELIVERY SYSTEM

4.02. EBT Card Management.

A. Policy Overview

The PA WIC State Agency will supply WIC Electronic Benefit Transfer cards (eWIC cards) to Local Agencies. Local Agencies shall accept shipments of eWIC cards and maintain a system to track eWIC card inventory records for all eWIC cards received until disposition. The State Agency will monitor eWIC card management practices and audit eWIC card inventory at Program Reviews.

B. Policy

1. Overview

To protect the WIC Electronic Benefit Transfer cards (eWIC cards) and the value of these cards, there are several steps the Local Agency staff must take:

- a. Monitor the level of inventory in the Management Information System (MIS) Use the MIS functionality to receive and verify eWIC card shipments received at the Local Agency.
- b. Complete the physical inventory monthly.
- c. Use the MIS to report lost, stolen or damaged cards.

2. Card Storage

- a. eWIC cards not in use (being issued to the participant) must be kept in a locked cabinet, drawer, or box at all times, except those cards for immediate use.
- b. eWIC cards shall not be used or stored at staff's home for telehealth purposes.

3. Monitoring Inventory Threshold

- a. The State Agency will determine the initial supply of eWIC cards that may be needed based on current caseload and food instrument issuance.
- b. The Local Agency shall monitor the inventory in the MIS and notify the State Agency if there is less than then the replenishment threshold on hand.

4. Shipping, Receiving, and Transferring Cards

- a. The State Agency will be responsible to ship eWIC cards to all designated shipping sites within the MIS. eWIC cards must be shipped to individual primary clinic sites or the administrative office within the Local Agency. Cards shall not be shipped to satellite

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clinics. Local Agencies must indicate to the State Agency when ordering eWIC cards the shipping address.

- b. Local Agencies shall be required to provide the State Agency with their designated shipping location(s) and must notify the State Agency of any changes to shipping locations prior to placing their next order for eWIC cards.
- c. eWIC cards will be shipped to a Local Agency in sleeves of 300 cards with six (6) wrapped packages of fifty (50) cards in each package.
- d. Local Agencies shall be required to designate two (2) staff members (1 primary and 1 back-up) at each shipping location who will be responsible for acknowledging receipt of a shipment from the State Agency. Designated staff are required to “receive” each shipment in the MIS no later than two (2) business days after the shipment arrives at the shipping location. Additional time to “receive” a shipment requires written approval from your Project Officer.
- e. Local Agencies shall be required to designate two (2) staff members (1 primary and 1 back-up) at each shipping location who will be responsible for “verifying” that a shipment from the State Agency was “received” in the MIS. Designated staff are required to “verify” each shipment in the MIS no later than two (2) business days after the shipment arrives at the shipping location. The primary staff person to “verify” cannot be the same as the primary person to “receive”
- f. If a Local Agency transfers cards from the location to which the State Agency shipped the cards, use the Operations > LA/Clinic EBT Card Inventory > Adjustments panel and contact your Project Officer, via email, to indicate where those cards should be redirected in the system inventory.
- g. The Local Agency may transfer eWIC cards from one clinic to another within the same Local Agency. Cards being transferred from one clinic to another or from one Local Agency to another must be in the wrapped package of fifty (50) cards, if possible.
- h. The Local Agency may transfer eWIC cards from one Local Agency to another if prior approval has been given by the State Agency. Cards being transferred from one clinic to another or from one Local Agency to another must be in the wrapped package of fifty (50) cards, if possible.

5. eWIC Card Check In and Check Out

Local Agency staff shall document when cards are checked in and out to staff. If cards will be assigned to a satellite clinic for use by multiple staff members, note the satellite clinic ID in the Comments field.

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6. Monthly Physical Inventory

- a. Physical inventory shall be performed on a monthly-basis by the 15th day of the following month using the appropriate PENN reports. Local Agencies shall be required to designate staff members at each shipping location that will be responsible for completing this task. The designated staff cannot be involved in any other areas of the eWIC card inventory process. If a clinic has only two staff members, the person conducting physical inventory may be one of the staff members who participated in receiving/verifying the inventory. If there is only one staff member in a clinic, the clinic will have to submit a written request for a policy exception with an explanation of how the clinic will monitor card inventory integrity.
- b. Physical inventory shall involve completing a manual count of all eWIC cards at a single location. Local Agencies shall be required to keep all PENN reports viewed, printed, and noted at each designated shipping site. Physical inventory reports shall be reviewed during program reviews. If the physical inventory identifies more than a 0.5% difference with the system inventory, the Local Agency shall be required to reimburse the State Agency for the cost of the cards above 0.5%.

7. Lost, Stolen or Damaged Cards

- a. If a card is reported lost or stolen by a participant or proxy, the card must be hot carded immediately. Hot carding is the term for locking the eWIC card to prevent transactions.
- b. A temporary hot card reason shall be used.
- c. Notify participants that if they find the lost card, they need to contact the Clinic immediately. The card may be reinstated but may not be used for at least three (3) days after being reinstated.
- d. Notify participants that if they would like a replacement card for a lost or stolen card, there is a mandatory waiting period of five (5) days or 120 hours.
- e. If a card is damaged after it has been issued, the card must be hot carded. If the damaged card is available for replacement, there may not be a mandatory waiting period. If the card cannot be read by the card reader, the mandatory waiting period applies.
- f. If a card is damaged before it has been issued, remove the card from inventory and adjust it back into the vault. If a series of cards are damaged before issuance, contact your Project Officer to determine if there is a card production problem.

8. Other Hot Card Reasons

There are other reasons that a card may need to be added to the Hot Card List (HCL). A change in family status can include several scenarios. Each requires different actions be taken in the MIS and with the eWIC card.

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a. Foster child adopted

When a foster child is adopted, the card must be hot carded first and then the child should be marked as "No Longer a foster". Select "Change in Family Status" as the reason for Hot Carding.

b. Foster child to a new family without card

(1) If a foster child moves into a new family and does not have their current eWIC card, the foster child's eWIC card should be hot carded. Select "Lost" as the reason for hot carding.

(2) The five-day waiting period will be enforced for the foster's card replacement. Schedule an appointment with the new endorser on the sixth day after the hot card effective date.

c. Custody changes/new foster

(1) If a child is removed from custody, the family's card must be hot carded until the endorser returns to the clinic and the child's benefits can be removed from the card.

(2) Contact the endorser to notify family that the card cannot be used for any member of the family and schedule an appointment as soon as possible to reinstate the card and recalculate benefits.

9. Disqualification/Termination

If a participant is disqualified or terminated, a future effective hot card date should be put on the card for the first of the next month. Current month benefits may be eligible for redemption. Contact the State Agency with any questions about which date should be used.

10. Moving Out of State

If a participant contacts the Local Agency and provides a date by which they will be moving out of PA, a future effective hot card date should be put on the card.

11. Mailing Cards

a. Cards shall not be mailed under any circumstances to individuals scheduled for a certification or if the recertification appointment is past due.

b. The LA shall have the option of mailing one, two or three months of benefits depending on the participants issuance cycle and whether the minimum nutrition education contact requirements can be met.

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- c. If mailing a new eWIC card, to a participant with an existing eWIC card, the existing eWIC card must be hot-carded prior to mailing the new eWIC card.
- d. Cards shall be sent by First Class Mail and shall bear "Return Service Requested" below the return address. One-quarter of an inch space above and below "Return Service Requested" shall remain blank. Enclose a brief statement on LA letterhead explaining why the card is being mailed.
- e. Documentation shall be maintained in the MIS on the Comments/Alerts panel whenever FIs are mailed. The date mailed and the reason why shall be included in the Comment.
- f. Cards may be mailed if the system is down during a participant appointment. The PIN is not required to write benefits to a card that is already set up.
- g. The LA WIC Director shall contact the project officer for approval prior to mailing large numbers of cards. Mailing of cards shall be discontinued as soon as the initial hardship is resolved.

Reference

1. 7 CFR 246.12(p)
2. 7 CFR 246.12(q)
3. 7 CFR 246.12(r)(4)

Policy Status:

1. This Policy supersedes P&P Number 4.02, dated May 15, 2017.
2. This P&P supersedes P&P Number 4.04 dated September 9, 2013
3. This P&P supersedes P&P Number 4.06 dated October 18, 2007
4. This P&P supersedes P&P Number 4.09, dated May 28, 2004
5. This P&P supersedes P&P Number 4.12, dated February 9, 2007
6. This P&P supersedes P&P Number 4.18, dated February 11, 2008
7. This P&P supersedes P&P Number 4.20, dated June 25, 2012