



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston, MA 02111


DEVAL L. PATRICK
Governor

JOHN W. POLANOWICZ
Secretary

STACEY MONAHAN
Commissioner

Operations Memo 2014-28
June 11, 2014

To: Department of Transitional Assistance Staff

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

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

Overview

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

Operations Memo 2013-57A outlined the systems changes and automations effective with BEACON Build 45.9, which took place November 25, 2013 and:

- advised staff about the Photo EBT card requirement and exceptions to the requirement;
- explained the types of photos available in BEACON;
- advised staff of their responsibilities; and
- provided procedures for cardholders with an exception to the photo EBT card requirement.

Operations Memo 2013-57A also detailed the requirements and procedures for Photo and non-Photo EBT card issuance and clarified instructions in the “Photo EBT Cards Automated EBT Appointments” and “Photo EBT Requirement” sections.

This Operations Memo clarifies Photo EBT procedures based on clarifications for non-applicants.

**Purpose
of Memo**

Operations Memo 2014-17 was issued to give new guidance relative to photo Mandatory cardholders provided temporary identification numbers (found in BEACON's Social Security Number (SSN) field). This Operations Memo is being reissued to advise staff of additional changes relative to the Photo EBT requirement.

BEACON enhancements were implemented in March to support the expansion of an exception for certain heads of household from the Photo EBT requirement.

Effective with BEACON Build 46.3, scheduled for June 16, 2014, photo images that were taken at a TAO for non-applicants were eliminated with the Batch Job of June 3, 2014. Photo images for these clients will no longer be retained by the Department.

Note: Photos identified as DTA Photo in BEACON have been eliminated. These are photos that were taken at a TAO, or were acquired from RMV, passed the 5 point match, and were identified as a DTA Photo. The original RMV Photo has not been eliminated.

This Operations Memo:

- describes the expansion of the categories of cardholders who are not subject to the Photo EBT requirement and ineligible for a Photo EBT card;
- explains that certain photos in BEACON for non-applicants will be eliminated from BEACON as well as systems edits that will prevent the future photographing of these clients; and
- advises staff of BEACON changes to support these changes.

Functionality and substantive changes can be found on pages: 3, 5, 9, 11, 12 and 16 (Sections: Photo EBT Requirement, Types of Photos, Photo EBT Cards, BEACON Changes and Photo EBT Requirement).

Obsolete Memo

Operations Memo 2014-17, *TAFDC, EAEDC and SNAP: Photo EBT Card Procedures* is now obsolete.

**Photo EBT
Requirement**

State law requires the use of photo identification on 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 2014-7.

Under the law, the following are excepted from the Photo EBT requirement:

- 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. All current and ongoing cardholders determined to have an exception can continue to use their current EBT Card. If a client meeting one or more of the above exceptions had received a Photo EBT card, the cardholder may request a replacement “Valid Without Photo” EBT card 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 is a 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.

**Photo EBT
Requirement**
(Continued)
Non-applicants

Non-applicant heads of household are not subject to the Photo EBT requirement. The following are non-applicants for purposes of the Photo EBT requirement:

For TAFDC they include:

- ineligible non-citizens;
- non-legally liable grantees; and
- SSI recipients.

For EAEDC they include cardholders who are:

- ineligible non-citizens; and
- non-legally liable grantees.

For SNAP they include cardholders who are:

- ineligible non-citizens.

Note: If a client is a grantee of multiple AUs and is a non-applicant in any one AU, the non-applicant rules apply. The client's Photo status will be set to "Exception –Responsibility" when an EBT Card is requested for these clients.

Clients who are non-applicant heads of household may not Opt-In to have a Photo EBT card.

If a new client has a Photo Status of "Mandatory" and an RMV Photo is brought into BEACON and a five point match is successful, the RMV Photo will be marked as a DTA Photo. If the client's Responsibility is changed to a "non-applicant" responsibility at any point, the DTA Photo will be automatically eliminated from BEACON.

The system will prevent the issuance of a Photo EBT card to a cardholder who does not have a valid SSN. In addition, BEACON programming will prevent non-applicants from having their photo taken.

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.

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.

Types of Photos
*RMV Photo
Conversion*

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 client.

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

DTA Photo

to the one that is 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* are available for use in the Photo EBT card process.

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*, Accept without the RMV image (for non-applicants appearing on the match) or Ignore the RMV photo to disposition the match. If the client appears on an Identity Match, the case manager should attempt to resolve the match prior to scheduling a Photo EBT Appointment for that client. Procedures for issuing an EBT card in these instances are outlined further below.

Types of Photos
(Continued)

Clients with an RMV image who appear on this match, who are required to have a Photo EBT card, must have a DTA photo taken unless the data discrepancy can be resolved by the case manager. The match must be dispositioned in order to issue the Photo EBT card.

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 discrepancies 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 appear on the new Identity Match view. Clients who appear on the Identity Match view, for whom the discrepancy cannot immediately be resolved by the case manager, must have a photo taken.

Non-applicants

Important: All DTA-taken photos for non-applicants were eliminated on June 3, 2014, and are being eliminated until Build 46.3 is deployed. Additionally, systems changes will prevent photo images from being taken and stored in BEACON for all non-applicants going forward.

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

On October 23, 2013, cardholders who were 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 9, 2013. 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 mailed replacement Photo EBT cards based on the last digit of the cardholder's SSN. The existing PIN was valid unless the household chose to switch the PIN. For this bulk mailing, the Photo EBT Card Carrier advised clients of the scheduled deactivation of their current EBT card and the activation of their new Photo EBT card. The EBT Brochure was included in the mailing. Mandatory cardholders added between October 9, 2013 and November 8, 2013 who had an available *DTA Photo* were included in the bulk replacement process.

**EBT
Replacement
Process**
*Bulk Photo EBT
Replacement
(Continued)*

Note: An EBT replacement type was added to BEACON. These replacements were part of a Central Print Request and had the new replacement reason of “Photo Needed – Bulk Request.” They were **not** subject to the \$5.00 fee replacement/fee.

New and replacement Photo and non-Photo EBT cards that were centrally issued included 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
*Client Preference
for Mailing or In-
Person Issuance*

Case managers must attempt to contact Mandatory cardholders by phone to determine if they would prefer that the replacement card be mailed to them or to receive an 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**. This process is required to ensure client benefit access.

If a client wishes to have his or her Photo EBT card mailed, the case manager is required to document the request in the Narrative tab.

**Photo EBT
Cards**
*Temporarily
Automated EBT
Appointments*

With BEACON Build 45.9, all Mandatory cardholders who were active as of November 22, 2013, without a *DTA Photo*, were 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 were **not** part of this scheduling. A new appointment letter type, EBT Photo Card, was added to BEACON. The letter includes each TAO’s dedicated phone line for questions or concerns clients may have in regards to the Photo EBT requirement (Attachment A).

Note: A new edit was added to the Schedule Appointment page preventing this appointment letter from being sent to a Nonapplicant.

Any Mandatory cardholders who became active or pending between November 12, 2013 and 22, 2013 who had a *DTA Photo* were included in the automatic appointment process. This process also applied to those clients who had an Identity Match as a result of the RMV to *DTA Photo* conversion process. Automatically scheduled in-office appointments were a temporary process during the initial roll-out period. These are no longer occurring.

**Photo EBT
Cards**
*Manual EBT
Appointments*

Mandatory clients who were added to BEACON after November 22, 2013, were not part of the automatic scheduling. These clients require the case manager to manually send an EBT Photo Card appointment, when they have a validated SSN. If there is a *DTA Photo* available that is not Questionable, the case manager may contact the client by phone, following the same procedures as above to ensure client benefit access.

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 or was scheduled, must be issued a card in accordance with current procedures.

Important: Mandatory cardholders due for recertification or reevaluation, who do not have a *DTA Photo*, **must** be scheduled for an in-office appointment to complete their interview, resolve any outstanding Identity matches and have their Photo EBT card issued.

The reevaluation and recertification processes now include cooperation with the Photo EBT card process as part of the interviews for Mandatory clients without a temporary identification number in the SSN field. Clients who fail to complete their recertification or reevaluation must be closed in accordance with 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 a TAO. This process must be followed in order to ensure client benefit access.

If a client misses his or her scheduled EBT Photo Card appointment, a second appointment must be manually scheduled. TAO staff must schedule a follow-up appointment using the Schedule Appointment page in BEACON by selecting the EBT Photo Card type.

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

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 an exception to the Photo EBT Card requirement as listed on page 2 and 3 of this Operations Memo. If no exception exists, the appointment must be rescheduled at a time or location that is more convenient for the client.

**Photo EBT
Cards**
*Manual EBT
Appointments
(Continued)*

Clients who appear on an Identity Match that cannot have the discrepancy resolved through information in the case record or by available data sources must be issued a VC-1 for the outstanding mandatory verification. See Operations Memos 2014-11 for additional guidance.

Important: Clients 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 by mail. 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 due to the inability to issue a Photo EBT card. 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.

With the exception of non-applicants as defined in this memo, clients who are:

- not currently active in another DTA program;
- do not have a temporary identification number in the SSN field;
- 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 at the time of application, unless there is another exception.

The *DTA Photo* will be marked Questionable until the case manager confirms that the SSN is validated and removes the Questionable status. A non-Photo EBT card must be issued at the time of application if a Photo EBT card cannot be issued. The TAO must follow the procedures below to ensure that the Mandatory client gets a photo taken and receives a Photo EBT card.

*Pending
Applications*

Those clients whose applications are assigned to a Web Unit and who are required or wish to have a Photo EBT card, but cannot be issued one, 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 once an SSN has been validated.

Non-applicants

Reminder: Non-applicants cannot Opt-In to have a Photo EBT card.

BEACON Changes

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

Electronic Case Folder

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 is 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 is displayed with the message “NO DTA PHOTO AVAILABLE.”

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

Case Manager Views

Changes to Case Manager Views:

A new column, *DTA Photo*, was 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; and
- 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 25, 2013.

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.
-

**BEACON
Changes**
(Continued)

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 displays 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 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.

Non-applicants

Important: Non-applicants as well as clients with a temporary identification number in the SSN field must not be required to have a photo taken as part of their recertification.

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

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

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

Note: Non-applicants as defined above will appear as Exception Responsibility.

The case manager can override this default determination for clients 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.
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**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 Opt-Out Override Reason.

Note: Effective with BEACON Build 46.2, users with a role of clerk or higher can select an Opt-In Override Reason.

Non-applicant

Important: Individuals who are non-applicant heads of household or who have a temporary identification number in the SSN field, are not eligible to Opt-In.

Additionally, the same fields and options on the previous page were added to the EBT Card Request - Request tab and the EBT Card Detail page.

An Appointments to Schedule/Temporary EBT Card Issued view was added. If a Mandatory cardholder is issued a non-Photo EBT card, the client is tracked on this view until a Photo EBT card is issued or they are no longer Photo EBT required.

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

Photo Page

Photo Page

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, the 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* was added. This group displays the current photo image(s), basic identifying information available for a grantee and allows access to the Photo page.

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

**BEACON
Changes**
(Continued)

Starting with BEACON Build 45.9, BEACON was able to store clients' photos. Once a photo is taken, if there is no Identity Match, the individual's SSN has been validated, and the case is active, this image becomes the *DTA Photo*.

Non-applicants

Note: BEACON will no longer allow non-applicants to be photographed for the purpose of getting a photo EBT card and their pictures cannot be stored in BEACON.

If the case is pending or the client has a temporary identification number in the SSN field, the photo is marked as Questionable until approved and a valid SSN is verified.

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

- DTA [Photo ID: 9999999]: Displays the unique internal Photo Id assigned to each photo stored in BEACON;
 - Select Photo: Allows the user to change the Primary photo designation from one *DTA Photo* to another *DTA Photo*;
 - Primary Indicator: This automatically defaults to the Primary *DTA Photo*. This is always disabled;
 - Questionable Indicator: Automatically set for a *DTA Photo* where there is an Identity Match. If an RMV Image is accepted then the Indicator is removed. If Ignore RMV Image is selected, then a pop-up question will allow the user to choose whether or not to remove the Questionable Indicator. This is also set for pending applicants who have their picture taken at the TAO. The Indicator should be removed by the user after the identity of the client is verified;
 - Take Photo: Allows an authorized user access to the Take Photo page;
 - Save: Allows a user to save the photo taken on the Take Photo page;
 - Resolve Match: Enabled if an Identity Match exists. Selecting the button opens the Identity Match page to resolve the data discrepancy between DTA's and RMV's personal identity information and to Ignore or Accept the image as a *DTA Photo*;
 - Show History: Shows all photo images taken or received for the client, sorted by the date the image became available in BEACON, newest to oldest; or
 - Print: Available for Program Integrity and the Fraud Investigation and Data Match (FIDM) Unit staff only. Prints all available images that have been taken or received for the client.
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**BEACON
Changes**

*Identity Match Page
(Continued)*

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 the DTA-RMV interface. If no RMV data exists, no record is 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.

*Case Manager
Responsibilities*

If an Identity Match exists for a client, it must be dispositioned by the case manager before a Photo EBT card can be created. A photo must be taken of a Mandatory cardholder who appears on the Identity Match view for whom the discrepancy cannot immediately be resolved by the case manager.

A hard edit prevents 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. 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 available data sources. The case manager must take one of the following actions:

- Accept RMV Photo: this Action copies the RMV image over as a *DTA Photo*. This should be selected when the case manager has determined that identity has been verified;
- Accept without RMV Photo: for Nonapplicants appearing on the match; and
- Ignore RMV Photo: When selected, 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.

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

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 is 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:

“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?”

**Case Manager
Responsibilities:
Photo EBT
Requirement
Exceptions**

If Yes is selected, upon saving the page, the RMV photo is copied. If No is selected, the action is cancelled.

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.
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**Case Manager
Responsibilities:
Photo EBT
Requirement
Exceptions
(Continued)**

- **AU Composition Results-** When this page is saved, if the cardholder is identified with a Responsibility of None, Ineligible Noncitizen, Noncitizen Disqualified, or SSI Recipient, then BEACON will set the photo status of the Pending Primary EBT Card request to *Exception – Responsibility* upon the EBC release. Similarly, if the client is identified with a Responsibility of Recipient, 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 is between 19 and 59, BEACON will 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.

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

Opt-Out and Opt-In Procedures

- 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 due to domestic violence, a referral **must** be made to the TAO's Domestic Violence Specialist, according to established procedures.

Important: A client does not need HLS status to claim an exception based on domestic violence.

Photo EBT Requirement
Opt-Out and Opt-In Procedures
(Continued)

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 must 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 must inquire, however, if the client otherwise needs assistance as afforded under the Americans with Disabilities Act, and then update the Narrative tab as appropriate.

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 Certification Statement* form (Attachment B) which is available in Policy Online – Online Forms. This form must be used for the client to attest that he or she objects to having his or her photo taken due to his or her sincerely held religious belief. Case managers must update the Narrative tab to reflect that the reason for the request is due to 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 or clerical staff must select the Opt-In Override reason. There is no fee the first time a Photo EBT card is issued to a non-Mandatory cardholder.

Reminder: Clients who are a non-applicant head of household or have a temporary identification number in the SSN field, may not Opt-In.

**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 MSP staff will manually refine the match results and report back to the Fraud Investigation Data Match (FIDM) Unit, for follow up as needed.

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

Operations Memo 2014-29: *TAFDC, EAEDC and SNAP: Photo EBT Card Issuance* details the process for printing Photo and Non-Photo EBT cards.

**Client Access
Reminder**

Under federal regulation, each 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.

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

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

Central Office staff will follow up with the retailer and FNS accordingly.

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

Some individuals when requesting a Photo or non-Photo EBT card, 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 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 in accordance with current procedures. TAO staff will be alerted of clients who need follow up to ensure benefit access. Special instructions have been issued from Field Operations via an email sent in November 2013.

Job Aid A Job Aid detailing the revised EBT card process will be made available on DTA Online in the near future.

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.

