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*Executive Office of Health and Human Services*  
**Department of Transitional Assistance**  
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**Operations Memo 2014-29**  
**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 Issuance

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**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 and 2014-18 advised DTA staff about this law, a mailing to all clients impacted by this change and criteria for mandated and excepted clients.

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**Purpose of Memo** This Operations Memo is a reissuance of Operations Memo 2014-18 to support revised procedures and new functionality relative to cardholders who are non-applicants, effective with BEACON Build 46.3, scheduled for June 16, 2014. Functionality and substantive changes can be found on pages 3 and 7 under “Photo EBT Requirements” and “Taking a Photo.”

Operations Memo 2014-18, now obsolete, outlined systems changes effective with the BEACON Build 45.9 that took effect for November 25, 2013 including:

- the new Photo EBT requirement and exceptions; and
- procedures on the issuance of Photo and non-Photo EBT cards.

This Operations Memo also clarified instructions in the “Procedures for EBT Reconciliation” and the “Centrally Issued Card Processing” sections.

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**Obsolete Memo** Operations Memo 2012-18, *TAFDC, EAEDC and SNAP: Photo EBT Card Issuance* is now obsolete.

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## Photo EBT Requirements

State law requires the use of photo identification on the front of each newly issued and reissued EBT card. Existing EBT cards are in the process of being replaced with new Photo EBT cards for all required cardholders.

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

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

Clients identified in BEACON as meeting one of these criteria are automatically granted an exception.

**Note:** Authorized Representatives, Authorized Payees and Authorized Representatives/Agencies may continue to use their current EBT Card. When a new or replacement card is requested, a non-Photo EBT card will be issued.

Clients who have been coded with a Heightened Level of Security (HLS) are 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.

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.
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**Photo EBT Requirements (continued)**

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

**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.

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

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**Types of Photos**

To be issued a Photo EBT card, a cardholder must have a *DTA Photo* on file. Images for Photo EBT use come from two sources:

- RMV - available if the client has a Massachusetts issued driver's license or state issued identification; and
- DTA - taken in a local TAO.

A photo is determined to be a *DTA Photo* if the image available from the RMV is an exact match on all data fields as outlined in Operations Memo 2014-28. A photo taken in a local TAO is considered a *DTA Photo*. The *DTA Photo* is only available for use on a Photo EBT card when the image is not marked as Questionable and there is no outstanding Identity Match.

*Non-applicants*

Cardholders who are non-applicant heads of household or who have a temporarily assigned number in the SSN field cannot be issued a Photo EBT card. These individuals may not opt to have a photo taken until such time as they are no longer a non-applicant and/or have a valid SSN.

Mandatory clients who have a temporarily assigned number in the SSN field or whose case is pending are ineligible for a Photo EBT card but may opt to have a photo taken. The *DTA Photo* will be marked Questionable until the case manager confirms that an SSN has been validated and removes the Questionable status.

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**Additions to BEACON and EBT Equipment**

The following BEACON changes were made to support this initiative:

- Added a photo icon on the Pending EBT Card view;
- Added a photo page accessed from the Photo icon on the Pending EBT Card view; and
- A new type was added to the view Appointments to Schedule/Temporary EBT Card Issued.

In addition, new equipment was procured to assist with this process:

- Webcams for taking pictures of clients who do not have an available *DTA Photo*; and
  - Printers with Photo and non-Photo EBT card printing capabilities.
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**Changes to  
BEACON –  
Clerical  
Responsibilities**

Changes were made to existing BEACON views and pages to more easily identify clients who need or wish to have a Photo EBT card.

**Pending EBT Card Request view:**

A new Take Photo column was added to this view. The column displays a value of Yes if the client is Mandated to have a photo or if the client has Opted-In and does not have a *DTA Photo* available. The column otherwise remains blank. Clerical staff issuing a Photo EBT card in office must select the client if the Take Photo column has a value of Yes, and they do not have a temporary identification number in the SSN field, and then click the Photo icon. This icon takes the clerical staff to the new Photo page.

**Photo page:**

From the Photo Page, the clerical staff must select the Take Photo button. This button takes the clerical staff to the new Take Photo page.

**Take Photo page:**

A new page called the Take Photo page is available as a pop-up page from the Photo page only when the Photo page is opened from the Pending EBT Card Request view.

**EBT Card Detail page:**

Three new fields were added to the EBT Card Detail page. The Photo (image) field, which displays the *DTA Photo* or “VALID WITHOUT PHOTO” image. If the client is not required to have a Photo EBT card, it will display “VALID WITHOUT PHOTO.” This is a display- only field.

The Photo (status) field displays the system-determined Photo EBT required status:

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

The Override field displays the reason used by the case manager to issue a Mandatory client a non-Photo EBT card. This field also displays the reason for issuing an eligible, non-Mandatory client a Photo EBT card.

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**Changes to  
BEACON –  
Clerical  
Responsibilities  
(Continued)**

**Important:** If a client who is Mandatory is requesting an Exception (or “Opt-Out”), they **must** be referred to their case manager.

If a client has an Exception, but chooses to Opt-In, the clerk may update the Override field. This field is accessible to users with a capability of clerk, case manager, supervisor or manager from the EBT Card Request page.

Those with an Exception type of Responsibility may not Opt-In.

Many clients were scheduled an appointment to be issued a Photo EBT card and to have their picture taken, where necessary. Appointments were scheduled according to the criteria outlined in Operations Memo 2014-28.

Those who were scheduled an EBT Photo Card appointment, automatically had their replacement card request appear on the Pending EBT Card Requests view.

**EBT Card Issuance page:**

A new page called the EBT Card Issuance page is used to show a preview of the card when the Submit & Print Card button is selected on the EBT Card Detail page. The Submit & Print button is used to update the Electronic Payment Processing Information Control (EPPIC) System and print the Photo or non-Photo EBT card. The Cancel button can be used to cancel out of the page without printing the card.

**Reminder:** If the machine to “PIN” the EBT Photo card is not operational, give the client the EBT brochure. This brochure contains instructions on how to call and PIN a card remotely. If necessary, clients must be assisted to complete the call and “PIN” their card in the local office.

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**Taking a Photo**

If a photo is required, clerical staff must use the provided Webcam to take a photo image of the client, from the Take Photo page using the Capture button. The software will determine if the image meets the size and clarity required and displays a preview of the card. The EBT clerical staff can either Accept the picture or retake the picture by clicking ‘X’ to return to the Photo page and re-clicking the Take Photo button. Once an image is Accepted, the image is stored as the Primary photo for the client with source set as DTA. The user is then returned to the Photo page.

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**Taking a Photo**  
*(Continued)*

Clients must remove any hats, dark glasses, scarves, or other items that obscure their face or head to take a photo. Garments that cover or obscure the face are not permissible and must be removed in order to take the photo. Head coverings worn due to religious beliefs, however, are permissible provided they do not cover or obscure the face. Clients who wish to request an Opt-Out due to their sincerely-held religious belief must speak to a case manager and sign the Religious Exemption Certification Statement.

If a Mandatory client requesting a new or replacement EBT card refuses to comply with the Photo EBT requirements, and does not meet the Exception or Opt-Out criteria, they **must not** be issued a replacement card. Only a Photo EBT card may be issued. As always, the client should be advised of their right to a Fair Hearing and may request an appeal. If requesting an appeal, an appeal form must be given to the client

*Non-applicants*

**Reminder: Clients who are non-applicant heads of household may not Opt-In. BEACON is programmed to prevent taking photos of these clients.**

If a technical problem prevents the taking of a photo, an EBT Card with the 'VALID WITHOUT PHOTO' must be printed and given to the client.

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**Temporary Staffing Support**

Temporary clerical staff were hired to assist in the initial phases of the Photo EBT implementation. A new Desktop Role, EBT Card Creator-Temporary, was created for this staff. Access to BEACON is limited to two views, the Pending EBT Card Request view and the Appointments to Schedule/Temporary EBT Card Issued view.

From the Pending EBT Card Request view, users, including those with the EBT Card Creator-Temporary role, can:

- create a Photo or non-Photo EBT card;
- schedule EBT Photo Card appointments;  
**Note:** The Print Location will be Central only.
- take a photo for in-office clients requiring a Photo EBT card; and
- access the EBT Card Detail page to print a card.

From the Appointments to Schedule/Temporary EBT Card Issued view, staff are able to track Mandatory clients who were issued a non-Photo EBT card and have not yet been issued a Photo EBT card.

Temporary clerical staff will only have the Schedule Appointment type of EBT Photo Card as a selectable scheduling option.

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**Procedures for  
EBT  
Reconciliation**

Temporary procedures and additional Benefit Issuance Unit support have been in effect during the initial high volume period. TAOs received guidance from Field Operations regarding this.

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**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 instructions were issued from Field Operations.

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**Job Aid**

An updated Job Aid detailing the new EBT card issuance process will be available on DTA Online in the near future.

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**Questions**

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

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