

RESOLUTION 08 - 2020

**THE BOARD OF COMMISSIONERS OF MONTROSE COUNTY, COLORADO  
ADOPTING MONTROSE COUNTY EBT  
MAIL CARD ISSUANCE POLICY AND PROCEDURE**

**WHEREAS**, pursuant to 10 CCR 2506-12, federal monies for Colorado's Food Assistance Program are administered through the Colorado Department of Human Services for the purpose of providing assistance to low-income families for the purchase of food; and

**WHEREAS**, Colorado Food Assistance Program benefits are administered by Electronic Benefits Transfer ("EBT") cards; and

**WHEREAS**, the Colorado Department of Human Services requires each county to establish a written policy to govern the issuance of EBT cards; and


**WHEREAS**, the Montrose County Human Services has established a proposed EBT Mail Card Issuance Policy and Procedure, which has been approved by the Colorado Department of Human Services.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MONTROSE COUNTY that:**

The Montrose County Human Services Policy/Procedure document entitled EBT Mail Card Issuance (MCI) Policy & Procedure, attached hereto as Exhibit 1, shall be and hereby is adopted as the official policy of Montrose County regarding the issuance of EBT cards.


Done this 5<sup>th</sup> day of February, 2020.

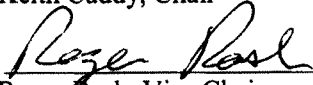
ATTEST:

  
Eloise Lentz, Deputy Clerk



**Board of County Commissioners of  
Montrose County, Colorado**

  
Keith Caddy, Chair

  
Roger Kash, Vice Chair

  
Sue Hansen, Commissioner

Exhibit 1 to Resolution 08-2020



**Montrose County**  
 Department of Human Services  
 Policy/Procedure

**ELIGIBILITY**

Policy Title <b>EBT Mail Card Issuance (MCI) Policy &amp; Procedure</b>	
Reference <b>Colorado Office of Economic Security</b>	Effective Date <i>2-5-2020</i>
Program Manager Signature <i>[Signature]</i>	Last Revised <i>NA</i>
Director Approval <i>[Signature]</i>	Board of County Commissioners Adoption Date <i>2-5-2020</i>

**Background**

Colorado Department of Human Services (CDHS) Office of Economic Security Memo Number: OM-FEA-2019-008 dated September 9, 2019 and titled EBT Mail Card Issuance requires that each county shall establish a written EBT Mail Card Issuance (MCI) policy and procedure.

**Definitions**

- CBMS - Colorado Benefits Management System
- CDHS - Colorado Department of Human Services
- EBT - Electronic Benefits Transfer
- EBT Card - Electronic Benefits Transfer Card aka Colorado Quest Card
- ebtEDGE - State of Colorado EBT Card Issuance website
- EXP FA - Expedited Food Assistance
- FIS - Colorado EBT Vendor
- MCBS - Montrose County Human Services
- MCI - Mail Card Issuance
- OTC - Over-the-Counter

**Purpose**

Montrose County Human Services (MCBS) shall establish an EBT Mail Card Issuance (MCI) Policy as required by CDHS.

## **EBT Mail Card Issuance (MCI) Policy:**

In Colorado, the case payee can obtain an EBT card over-the-counter (OTC) or through the Mail Card Issuance (MCI) Process at any local county office. The local county office is responsible for issuing the initial EBT card. The case payee can obtain a replacement EBT card at any local county office, or by contacting the EBT vendor (FIS) at 1-888-328-2656. The case payee should be allowed to choose how they would like to receive their EBT card, either in person or by mail. Montrose County must process all MCI requests within 24 hours.

All newly certified households shall be given the opportunity to participate no later than thirty (30) calendar days following the date of application. Households eligible for expedited services shall be allowed to participate no later than seven (7) calendar days following the date of application. An opportunity to participate consists of providing the household with an active EBT card and PIN, posting benefits to the household's EBT account, and making benefits available for spending.

At least two individuals, EBT Clerk and EBT Supervisor or Designee, must be involved when the card is issued from the Montrose County EBT Card Inventory and mailed from Montrose County's office. The EBT Clerk will activate the EBT card, and the EBT Supervisor or Designee (cannot have CBMS conflicting profiles) will place the card in a sturdy non-forwarding envelope and keep the card secure until it leaves Montrose County's office for mailing.

When Montrose County utilizes the ebtEDGE auto issue/re-issue function, the EBT Supervisor or Designee does not need to be present or involved in the process. The auto issue/re-issue function should be used when the cardholder is not eligible for Expedited Food Assistance (EXP FA), there is not a documented hardship/need to receive sooner, and the address is correct in ebtEDGE. The card is printed and mailed by the Colorado EBT vendor and can take seven (7) to ten (10) business days for the cardholder to receive the card.

Montrose County is required to use the State approved letter when mailing the EBT card from its office. The State approved letters are attached to this document, and Montrose County has not altered the language provided by CDHS. Montrose County has included the main phone number of Montrose County Human Services on the letter.

Montrose County has established a written EBT Mail Card Issuance (MCI) procedure that defines how the process will work at Montrose County Human Services. Montrose County has included in our procedure a documented process to handle EXP FA and households experiencing a hardship as they require access to benefits sooner than the seven (7) to ten (10) business days. Montrose County's policy has defined the hardship criteria and a process to ensure that the card is provided timely based on federal processing guidelines and household circumstances. Examples of hardship could include, but not limited to, delay in mailing would cause a financial hardship for the client (eviction or power turned off), would cause a food shortage, etc. In these situations, Montrose County must overnight or rush the EBT card based on county defined process. All county staff involved in the mailing of an EBT card shall follow Montrose County's MCI procedure. The State recommends layers of internal controls for fraud prevention.

## **EBT Mail Card Issuance (MCI) Procedure:**

### **Step 1 (Eligibility Worker):**

The Eligibility Worker must discuss benefit access options during the interview. If the case payee already has an EBT card, even if the card was issued several years ago, it is not necessary to issue a replacement card. If the case payee does not have an EBT card, the Eligibility Worker should offer them the option to get the card at any local county office or through the mail. The conversation should be documented in CBMS Case Comments.

Here are some things to consider:

- The quickest option is the OTC Issuance at Montrose County Human Services, including issuing an EBT card to an assigned Authorized Representative on the case (in ebtEDGE Alternate Cardholder).
- The client can contact the Colorado EBT Vendor (FIS) directly to obtain a replacement EBT card. Keep in mind that the process can take seven (7) to ten (10) business days and this is not an option for the initial EBT card. The EBT vendor will only mail the card to the address listed in ebtEDGE. If the client recently moved, this may not be an option.
- If the case payee recently moved or the address has not been updated in ebtEDGE, Montrose County will need to issue and mail the card (from Montrose County's cardstock) to the case payee. It is important to ensure that the client reported the change of address to the United States Postal Service (USPS), even if it is a temporary address to ensure the Post Office doesn't return the mail.
- If the case payee is facing financial hardship or food shortage challenges and is requesting the card by mail, Montrose County should consider overnight or express mail. Document if the case is an EXP FA or hardship. The Eligibility Worker should be familiar with the issuance operations, so they can answer any questions the household may have about when, where, and how to access one's benefits from the EBT card.

### **Step 2 (Eligibility Worker):**

When the Eligibility Worker determines the need for MCI, they will:

- Complete the EBT Card Issuance Referral form and indicate the request for MCI.
- Attach verification of the case payee's address to ensure the card is mailed to the correct address. This could be a rent receipt, utility bill, copy of most current change report form, RRR, application, CBMS screenshot of address page, etc.
- Provide to the Designated Supervisor.

### **Step 3 (Designated Supervisor - EBT or Eligibility Supervisor, Manager, or Director):**

The Designated Supervisor could oversee either EBT or Eligibility; they are responsible for approving the request.

- Review the EBT referral form and address verification.
- Verify the address in CBMS to ensure that the addresses match.
- Confirm CBMS Case Comments.

- Verify the address in ebtEDGE. If the address is correct in ebtEDGE and there is not a documented hardship or EXP FA, the EBT referral form and address verification can be provided to the EBT Clerk to auto issue the card in ebtEDGE. If the address is not updated in ebtEDGE, there is a documented hardship or EXP FA, the EBT referral form and address verification will be provided to the EBT Supervisor or Designee, and the card will be mailed from Montrose County Human Services.

*Step three is not necessary when the EBT card will be issued using the auto issue/re-issue function in ebtEDGE; however, it creates an additional check and balance at the local level.*

#### **Step 4 (EBT Issuance Clerk and EBT Supervisor or Designee):**

An EBT Issuance Clerk and the EBT Supervisor or Designee shall be involved when issuing and mailing an EBT card at Montrose County Human Services. Due to the separation of duties, the designee cannot be involved in any Eligibility function. The EBT Issuance Clerk does not need any additional oversight when auto issuing the card in ebtEDGE.


- Auto Issue EBT Card in ebtEDGE (Clerk Only):
  - INITIAL CARD: The Issuance Clerk will issue the initial EBT card using the auto-issue function in ebtEDGE. On the Card tab, leave the Card# field blank (do not swipe an EBT card from the Montrose County inventory) and select the PIN Type of "No PIN."
    - The EBT card and brochure will be mailed to the client via Card Pro, a service through the Colorado EBT vendor, FIS.
    - The EBT Issuance Log should not be completed as a card was not issued out of Montrose County's inventory.
  - REPLACEMENT CARD: The Issuance Clerk will issue a replacement EBT card using one of the state-approved Auto-Reissue statuses in ebtEDGE and select the PIN Type of "No PIN."
    - The EBT card and brochure will be mailed to the client via Card Pro, a service through the Colorado EBT vendor, FIS.
    - The EBT Issuance Log should not be completed as a card was not issued out of Montrose County's inventory.
- Issue EBT Card Over-the-Counter (Clerk and EBT Supervisor or Designee):
  - The Issuance Clerk will issue an initial or replacement EBT card through the OTC process in ebtEDGE (Montrose County EBT card inventory) and select the PIN Type of "No PIN."
  - Record the EBT card on the EBT Issuance Log. In the Client Signature column indicate "card mailed".
  - The EBT Supervisor will mail the EBT card, the State-approved EBT Mail Card Letter, EBT brochure, and the EBT Card Ownership and Personal Responsibility Statement to the Cardholder. The brochure will explain to the client how they can set their PIN.
  - The activated EBT card must be secured until it is delivered to the USPS or leaves Montrose County Human Services.
  - Montrose County must use the State approved EBT Mail Card Letter (attached) when mailing the EBT card from Montrose County Human Services.
  - Montrose County will use the CDHS as the return address on all MCI envelopes. The State EBT Program will destroy any returned EBT cards.
    - CDHS - 3<sup>rd</sup> Floor  
Attn: EBT Program (301)  
1575 Sherman St.  
Denver, CO 80203

- Access to the EBT card cannot be delayed pending a signature on the EBT Card Ownership and Personal Responsibility Statement.

### Key Points:

- An initial, first EBT card can only be issued at the local county office through the OTC or MCI procedure
  - The local county office, if not familiar, should test first-class mail timeframes across your county to provide cardholders approximate timeframes
- A replacement EBT card can be issued at the local county office through the OTC or MCI procedure or by the cardholder contacting the EBT vendor (1-888-328-2656)
  - Allow seven (7) to ten (10) business days for the card to arrive in the mail
- Access to Benefits (4.701):
  - Montrose County shall ensure that the household has access to their benefits within the timeframes defined by program area (7 days for expedited services, 30 days for regular SNAP, and 45 days for cash assistance).
    - Access includes benefits posted to the EBT account, providing the household with an active EBT card and PIN, and having benefits available for spending.
  - Depending on the needs of the household, it may be necessary to rush or overnight the EBT card.
- When mailing an EBT card to a household, Montrose County shall (4.701):
  - At a minimum, use first-class mail
  - Use a sturdy non-forwarding envelope or package
  - The EBT Supervisor or Designee is responsible for ensuring the card security until it leaves the local county office
  - Shall use the CDHS as the return address so all EBT cards not delivered are returned to the State EBT Program, and not the local county office. The State EBT Program will destroy the returned card.
    - CDHS - 3<sup>rd</sup> floor  
Attn: EBT Program (301)  
1575 Sherman St  
Denver, CO 80203
  - The EBT card, EBT Mail Card Letter, EBT brochure, and EBT Card Ownership and Personal Responsibility Statement should be sent together to notify the client to call the number on the back of the card to select a PIN
    - Because no PIN was set for the client, the letter does not need to be mailed separately.
  - Access to the EBT card cannot be delayed pending a signature on the EBT Card Ownership and Personal Responsibility Statement
- The EBT card must only be issued OTC or mailed to (4.203.2, 4.203.21, 4.701.2):
  - The head of household; or
  - The authorized representative

Signed by:

  
\_\_\_\_\_  
Chair, Montrose County Board of County Commissioners

2-5-2020  
\_\_\_\_\_  
Date