



ALAMEDA COUNTY
**COMMUNITY
FOOD BANK**



Publisher of Consumer Reports

An Advocate's Guide to Electronic Benefit Transfer (EBT) in California

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INTRODUCTION

This Advocate's Guide was prepared by the Alameda County Community Food Bank and the West Coast Regional Office of Consumers Union to provide community-based organizations, advocates, and recipients throughout California with information they may need to participate in the transition to the Electronic Benefit Transfer (EBT) system in their counties. EBT is an electronic delivery system for use by recipients to access public assistance benefits. California counties will be transitioning to the EBT system for food stamp benefits over the next two years. At the same time, a majority of these counties will also be transitioning to EBT to distribute cash benefits.

For many recipients, EBT represents a dramatic change in the way they are accustomed to receiving benefits and managing their finances. Ensuring that recipients have a positive experience with the new system is a goal of all of those who are involved in the EBT transition process. The EBT system also requires county welfare departments to significantly change the way they deliver services to their clients. Establishing successful new policies and procedures that work well for recipients and county welfare department staff are essential for the effective delivery of benefits through EBT.

Two pilot counties in California have successfully converted to the new EBT system. Their county welfare departments are reviewing their newly established policies and procedures for EBT and are making changes where necessary. The majority of recipients in the pilot counties are successfully using EBT. A large part of this Guide is based on EBT implementation experiences in Alameda County, one of the two California pilot counties. We have included many of the successes and challenges of the transition to EBT in this pilot county, as well as suggestions for how advocates and recipients can work toward the successful implementation of EBT in their counties.

This Guide covers the following areas: a general overview of EBT; advocate and recipient participation in the EBT transition process; county decisions and considerations for EBT; training and outreach; and the pilot evaluation process. For convenience and quick reference, the Guide includes a glossary of EBT-related terms, an index, and an appendix. A list of helpful websites and contacts is also included.

It has been the experience of advocates and county welfare department staff in Alameda County that collaboration between the community and county welfare department has resulted in a more successful EBT transition for the majority of recipients. We hope that this Guide will help to facilitate the process of collaboration between other communities and county welfare departments to ensure a smooth and successful transition to the EBT system in their counties.

SECTION ONE: Overview of Electronic Benefit Transfer (EBT)

What is EBT?

Electronic Benefit Transfer (EBT) is an electronic system used to deliver food stamp benefits to recipients. In some California counties, it will also be used to deliver CalWORKs, General Assistance (GA)/General Relief (GR), Cash Assistance Program for Immigrants (CAPI), and Refugee Cash Assistance (RCA). In the future, EBT in California may be expanded to include such programs as Women, Infants and Children (WIC), foster care, Workers' Compensation, In-Home Supportive Services, etc.

How Does EBT Work?

People receiving food stamp benefits will no longer receive food stamp coupons every month. Instead, they will be issued a plastic debit-like card and a personal identification number (PIN) through which they will access their benefits. With the EBT system, recipients will pay for their groceries by swiping the EBT card (also called a Golden State Advantage card) through Point of Sale (POS) devices in stores. All Food and Nutrition Service (FNS) authorized retailers should be able to accept the EBT card after signing up with Citicorp to do so. Citicorp is the State's contractor hired to deliver EBT services in California.

In those counties that choose to deliver cash benefits through EBT, these benefits will be accessed through POS devices and Automated Teller Machines (ATMs). A recipient can pay for his or her cash purchase by swiping the EBT card through a POS machine. At many ATMs and stores with POS machines, people receiving cash benefits will also be able to get cash using their EBT cards.

Why is California Changing to EBT?

EBT is part of the 1996 federal welfare reform legislation. The federal government decided that food stamp coupons are too expensive to manufacture, distribute, and destroy. They also believe that an electronic delivery system will reduce fraud. All states are required to convert to EBT by October 2002. California will not have EBT implemented throughout the state by this deadline. The USDA has granted California a waiver to go beyond this date.

As of October 2002, 45 states (plus the District of Columbia and Puerto Rico) are using EBT to distribute food stamp benefits statewide. Three other states are either piloting their EBT systems or are in the process of expanding their systems statewide. Most of these states are using EBT for both food stamp and cash benefits distribution.

When Does EBT Start in California?

EBT will be implemented throughout California over the next two years. The final counties should roll out in December 2004. Alameda and Yolo Counties are the

California EBT pilot counties and rolled out in August 2002. San Diego and San Bernardino Counties entered into contracts for the implementation of EBT for food stamps benefits in 1997. When their current contracts for EBT services expire, they are expected to switch to the statewide EBT system, and could also choose to distribute cash benefits through EBT. Sacramento County entered into a contract in 1997 to use EBT for General Assistance. When the Sacramento contract expires, they are also likely to use the statewide EBT system.

Important county decisions will be made in each individual county during the year prior to that county's roll-out. A County Implementation Schedule is attached as Appendix A. Updated schedules can be found on the State EBT Project website at www.ebtproject.ca.gov.

Who Is Responsible for EBT in California?

In 2001, the State entered into a seven year, \$250 million contract with Citicorp Electronic Financial Services, Inc. (Citicorp or CEFS) to provide the electronic delivery of Food Stamp Program benefits and cash benefits. The contract may be extended beyond this period for an additional two years. Citicorp has the vast majority of state EBT contracts nationwide. For more information about these contracts, see www.fns.usda.gov/fsp/MENU/ADMIN/EBT/Status/EBT_Status_Report.htm.

The Health and Human Services Data Center and the California Department of Social Services are responsible for overseeing the EBT contract with Citicorp. The (California) State EBT Project consists of staff from these two state agencies.

What Choices Do Counties Have?

All counties must distribute food stamp benefits through the EBT system, but each county was given the choice of whether to also use EBT to distribute cash benefits. It is possible that counties that have not already chosen to do so, may in the future, choose to issue cash benefits through EBT. Thirty-seven California counties have, thus far, chosen to distribute CalWORKs benefits through the EBT system and eleven counties have chosen to distribute GA/GR through EBT. The list of counties choosing to distribute cash benefits through EBT is attached as Appendix B. This list of counties can also be found at the State EBT Project website at www.ebtproject.ca.gov.

In addition to choosing whether to issue cash benefits through the EBT system, counties will have to make several other decisions. The decisions include: How to transition recipients to the new EBT system; how to issue cards for new cases; how to issue replacement cards; what languages to use for recipient training materials; whether to apply for a countywide exemption from the three-day stagger required for cash benefits distribution; and other decisions. These decisions must be made by each county starting approximately ten months prior to the county's EBT roll-out. To learn more about the county decisions that must be made, see Section Three and Appendix C (County EBT Decisions).

SECTION TWO: Advocate Participation in EBT Implementation

At the urging of advocates across California, the State and some counties have established committees consisting of State and county decision makers, advocates, and public assistance recipients. These "formal" committees are a good way to ensure that recipients and recipient advocates impacted by EBT are able to discuss with county welfare department staff ways to best implement the new system throughout the state and in their respective counties. Other counties and communities are working less formally in community partnerships. Discussed in this section are some of the committees or partnerships that have been created thus far and suggestions for what other advocates in California can do to start the collaborative process in their counties.

- A. Client Advocate Forum-Statewide** **Page 4**
The Client Advocate Forum is a statewide quarterly forum convened by the State EBT Project. Client advocates and recipients from across the state attend these meetings to discuss EBT issues and implementation throughout California with State officials and decision makers.

- B. Alameda County EBT Advisory Committee** **Page 5**
This is a committee developed in the pilot county of Alameda that has been meeting monthly to discuss EBT issues and implementation in Alameda. The committee members include advocates, recipients, county staff, and Board of Supervisors staff.

- C. Community Participation in Various Counties** **Page 9**
Advocates and community members in other counties are working with their county welfare departments to ensure a smooth EBT transition.

- D. Suggestions for Advocates Throughout the State** **Page 11**
Advocate and community participation is essential for a successful transition to EBT. This subsection suggests ways to start working on EBT in your county.

CLIENT ADVOCATE FORUM - STATEWIDE

Background

The Client Advocate Forum started meeting in March 2000 at the request of statewide advocates to meet quarterly with State officials to discuss the EBT system and how it would be implemented throughout California and in individual counties.

The Purpose of the Forum

In Forum meetings, the State EBT Project staff provide information about EBT policy, decisions, and implementation to community members and groups. Advocates and recipients have the opportunity to provide feedback to the State on the issues presented and also to provide feedback in their areas of expertise about how EBT decisions could or are already impacting recipients. As EBT rolls out throughout the state, this forum offers advocates an opportunity to hear from other advocates and recipients about experiences with EBT in their respective counties and to make suggestions to better implement the EBT system in the rest of the state.

The Forum Composition

Forum participants include State EBT policy makers, county staff, advocates, and recipients. "Membership" on this committee is open to any recipient or community advocate who is interested in making the EBT system work well. Regular Forum participants include: ACORN, Alameda County Community Food Bank, California Association of Food Banks, California Reinvestment Committee, Consumers Union, Eden Information and Referral (Alameda County), Food Banks of Northern California, Homeless Action Center (Alameda County), Legal Services for Seniors (Alameda County), Legal Services of Northern California, San Francisco Food Bank, Strategic Actions for a Just Economy (Los Angeles), Supportive Parents Information Network (San Diego), Sacramento Hunger Commission, and the Western Center on Law and Poverty.

Additional advocates and recipients are invited to participate in these meetings. For more information about the Forum, please contact State EBT Project Liaison Dave Swift at (916) 263-3621 or dave.swift@sid.hhsdc.ca.gov, or Debra Garcia of Consumers Union at (415) 431-6747 or dgarcia@consumer.org.

The Forum Has Impacted EBT Throughout the State

Some of the successes of advocates and recipients on the Forum include: persuading the State to encourage counties to solicit community feedback on each county's cash access plan (see page 20); improvement to the State's training materials through review and feedback of the materials; persuading the State to include both Cantonese and Mandarin on Citicorp's Customer Service Helpline; and persuading the State to send four key EBT communications to recipients in all ten of the languages in which written training materials are to be provided.

ALAMEDA COUNTY EBT ADVISORY COMMITTEE

Background

Approximately two years in advance of rolling out EBT in Alameda County, local advocates learned that their county would pilot EBT. A number of direct service organizations in Alameda County that were familiar with the county welfare department (CWD) and the Food Stamp and cash aid programs were concerned that the County and State would implement an EBT system without community input. In September 2000, a small number of advocates and recipients requested a meeting with the CWD to discuss how the community would be involved in the decision-making processes of EBT implementation. The first meeting between the community and County was in January 2001. State representatives were also in attendance.

Following the meeting, advocates and recipients requested that the CWD create a committee to ensure ongoing community input. They asked the Board of Supervisors to support an *EBT Oversight Committee* to consist of advocates, county staff, Board of Supervisors staff, and recipients and presented a draft charter to the Board. Although the name was changed to *EBT Advisory Committee*, advocates were successful in this request, with the Board endorsing the creation of the committee. After four negotiating sessions over the next several weeks, advocates and the CWD agreed upon a charter to govern the Alameda County EBT Advisory Committee (Appendix D).

The Advisory Committee met once a month for several months prior to the implementation of EBT in Alameda County and kept the Board of Supervisors apprised of their progress on a regular basis. In addition to monthly meetings, Advisory Committee members and other community members met on a more frequent basis, forming subcommittees to discuss issues specific to certain processes or recipient populations. The subcommittees formed include: the Client Conversion Subcommittee, the Limited English Proficient (LEP) Subcommittee, the Communications Subcommittee, and the Cash Access Subcommittee.

The committee structure was formal, following *Brown Act* public meeting rules, which required that agendas and minutes be publicly posted. In addition, the committee used *Robert's Rules of Order*, allowing for more structured discussion when controversial topics arose.

It is the broad consensus of CWD staff, advocates, and recipients involved in the process, and the Board of Supervisors, that the success of Alameda County's roll-out is, in part, attributable to the work of the Advisory Committee. Alameda County's Board of Supervisors sent a letter to the State's EBT Project Director suggesting that for continued success in the implementation of EBT throughout the rest of California's counties, other counties should be encouraged to adopt a similar method for county welfare departments and communities to work together in implementing EBT. A copy of the letter is attached as Appendix E.

The Purpose of the Committee

According to the Alameda County EBT Advisory Committee charter, "The purpose of the Alameda County EBT Advisory Committee is to assist in ensuring that recipients are presented with the best possible Electronic Benefit Transfer (EBT) system."

In practice, the purpose of the Advisory Committee was carried out by:

- Providing a forum for CBOs, advocates, recipients, Board of Supervisors staff, and county welfare department (CWD) staff to discuss decisions that had to be made for the successful implementation of EBT in Alameda County;
- Allowing for community input into those decisions;
- Bringing to the attention of the CWD issues of concern to recipients and the community; and
- Working together toward solutions to actual and/or potential problems with EBT.

The topics discussed in these meetings, and addressed by hours of work that occurred outside of the meetings, are covered in this Guide.

Composition of the Committee

The Alameda County EBT Advisory Committee was composed of "Voting Members" and "Resources." Both advocates and county welfare department (CWD) staff wanted to assure fairness in the decision-making process and also did not wish to discourage other members of the community, or State representatives, from participating in the meetings. The Committee was co-chaired by one CWD staff person and one advocate. Meeting facilitation was rotated between the co-chairs.

The voting members included seven community advocates, two recipients, three CWD staff, and two Board of Supervisors staff. Alternate members for each category attended and participated in the meetings. On the rare occasion when a vote was called, the alternates voted only if they were filling in for a "regular" voting member.

"Resources" consisted of State staff, community members, and other guests. If a vote was called, the resources did not vote. At the beginning of each meeting, the chair asked the committee's voting members for permission for the resources to be able to participate in the discussions. Full participation was always allowed (with the exception of voting).

The community-based organizations represented on the Advisory Committee and subcommittees include:

Advisory Committee: Alameda County Community Food Bank, Bananas Child Care Referral Agency, Bay Area Legal Aid, California Reinvestment Committee, Catholic Charities of the East Bay, Consumers Union, Davis Street Community Center, East Bay Community Law Center, Homeless Action Center, Legal Services for Seniors, and the Women's Economic Agenda Project.

Advisory Subcommittees: Advisory Committee member organizations, Board of Supervisors staff, Asian Community Mental Health Services, Lao Family Center, Legal Language Access Project, National Immigrant Law Center, East Bay Vietnamese Association, Rescue Committee, Traveler's Aid, Oakland Private Industry Council, and other immigrant and direct service provider organizations.

How the Advisory Committee Impacted EBT in Alameda County

Because it is impossible to know how EBT would have been implemented in Alameda County if the Advisory Committee had not been formed, we can only suggest those things that we are relatively certain resulted from the participation of the Advisory Committee. Below is a short list of some of the most important outcomes of the Advisory Committee's involvement.

At the State Level:

- The State required Citicorp to include Mandarin and Cantonese customer service on the Helpline, rather than just Mandarin.
- The State requested input on the format of the cash access plan to make it more accessible for communities to interpret, and implemented some of the Advisory Committee suggestions.
- The State improved CBO and recipient trainings and translated additional training materials partially as a result of Advisory Committee feedback.
- The Alameda County EBT Advisory Committee set a precedent and can serve as a model for other counties to involve CBOs, recipients, and other community members during their EBT implementation.
- The State agreed to survey recipients and CBOs during pilot evaluation and the Advisory Committee advised and assisted the State in collecting recipient and CBO interviews.

At the County Level:

Service to Recipients

- More time and attention was paid to barriers facing Limited English Proficient (LEP) recipients – especially with regard to how the county welfare department (CWD) would provide translated forms, offer interpretation services at community forums, and make calls to those who had not used their EBT cards in the first ten days after conversion.
- The CWD sent six notices (multilingual) to recipients prior to roll-out and the notices were easier to understand due to Advisory Committee input. See Appendix F for a copy of the first notice sent to recipients in February 2002.
- The CWD prepared recipient-friendly forms (e.g., cash EBT exemption and three-day stagger exemption forms) as a result of Advisory Committee input.

Community Outreach

- The CWD and Board of Supervisors staff coordinated twelve community forums about EBT, in general, and one community forum regarding fraud, personal security, and privacy issues, in particular.

- More CBOs were prepared for the change because advocates and CWD staff worked together to ensure that as many CBOs as possible were invited to meetings and received materials regarding EBT prior to roll-out.

Cash Access

- The Board of Supervisors staff became involved in helping the State and Citicorp contact local businesses to sign up to accept EBT.
- The State received additional encouragement from advocates to ensure that the county's cash access plan better met the needs of recipients, especially in hard-to-serve zip codes.
- The State and Citicorp contacted ethnic retailers, in languages other than English, who were identified by the LEP Subcommittee as limited English proficient speakers.
- The CWD agreed to develop and distribute to recipients lists of locations of surcharge and surcharge-free ATMs throughout the county.

Food Stamp Access

- More attention was brought to farmers' markets and ethnic retailers as locations that serve food stamp recipients, and that otherwise might have been left behind in the EBT transition.

What the Advisory Committee Did Not Do

In hindsight, there were some things that the Alameda County EBT Advisory Committee did not accomplish that advocates would have liked. Other recipient advocates may wish to consider these ideas for their counties. Advocates on the Advisory Committee were unable to:

- Convince the county welfare department (CWD) to allow all GA recipients to "opt-in," rather than "opt-out" of cash EBT (see page 34 for more information);
- Convince the CWD to set up its own EBT helpline, as was done in Yolo County;
- Improve EBT services and procedures for homeless and disabled recipients (see page 44 for more information);
- Encourage greater participation by farmers and farmers' markets to ensure that they would be able to continue to accept food stamp benefits for purchases after EBT implementation and that they would be ready to do so when Alameda County rolled out EBT (see page 57 for more information).

Advocates in other counties may wish to consider the issues addressed by the Alameda County EBT Advisory Committee as starting points to improving the EBT transition process in their communities.

COMMUNITY PARTICIPATION IN VARIOUS COUNTIES

The success of the pilot county of Alameda was due, in part, to the county welfare department's willingness to allow and invite community participation in the EBT development and implementation process. Implementing EBT is a tremendous undertaking and recipients will be better served by the involvement of community organizations, advocates, and recipients. In addition to the statewide Client Advocate Forum and the EBT Advisory Committee established in the pilot county of Alameda, advocates and recipients in other counties set to roll out EBT in the near future have also started dialogues with their county welfare departments.

Los Angeles County

Similar to Alameda County, Los Angeles County has also established a "formal" advisory committee. The Los Angeles County EBT Advisory Committee started meeting monthly in Spring 2002. Voting members include recipients, community advocates, and county welfare department staff. Los Angeles County has approximately 40% of the welfare caseload in California and it is crucial that advocates work to ensure that the EBT system works well for recipients throughout Los Angeles. If you would like information about participating on the Committee, contact Debra Garcia of Consumers Union at (415) 431-6747 or dgarcia@consumer.org, or the SAJE EBT Action Committee at (323) 732-9961. A copy of the Los Angeles County EBT Advisory Committee Charter is attached as Appendix G.

Solano County

The Solano County EBT Advisory Committee also began meeting monthly in Spring 2002. Solano County is scheduled to roll out in December 2002. Community members, recipients, and county welfare department staff have been working well together to ensure the best possible implementation of EBT in Solano County. A copy of the Solano County EBT Advisory Committee Charter is attached as Appendix H. For further information, contact Debra Garcia of Consumers Union at (415) 431-6747 or dgarcia@consumer.org.

Fresno County

Fresno County is an EBT food stamp-only county and is scheduled to roll out in February 2003. Fresno will be one of the first food stamp-only counties to convert to EBT. Community members in Fresno have formed an EBT Action Team and are trying to work with the county welfare department to ensure a smooth transition to EBT. For information about the EBT Action Team, contact Edie Jessup of Fresno Metro Ministries at (559) 485-1416 or edie@fresnometmin.org.

San Francisco

San Francisco County is also an EBT food stamp-only county scheduled to roll out in February 2003. Advocates and county welfare department staff started meeting on a semimonthly basis in October 2002. They have decided to collaborate on the following six specific areas: farmers' markets, small retailer outreach, group living facilities, homeless conversion, client notices, and the food stamp stagger gap. For further information, contact Cindee Billings of the San Francisco Food Bank at (415) 282-1900 or cbillings@sffb.org.

Yolo County

Yolo is a California EBT pilot county in addition to Alameda. Because the decision to include Yolo County as a pilot county was made just months prior to EBT roll-out, there was not enough time for many members of the community to learn about EBT and become fully involved in the transition. However, a few advocates requested that they be included in the county's implementation process and were able to provide valuable input.

In response to advocates' requests to be involved in the EBT transition process, the county welfare department invited a small number of advocates to participate on the county "workgroups." County "workgroups" to be established in each county as part of EBT implementation include the Benefit Access Workgroup, the Conversion Workgroup, the Communications/Outreach Workgroup, and the Training Workgroup. The general consensus of the advocates was that this type of community involvement was not very productive. The county workgroups are made up of county staff who have a number of specific tasks that they must accomplish to implement EBT. Much of a typical two hour meeting was spent with county staff discussing the tasks that they had to carry out. There was seldom enough time for meaningful community input and some advocates became frustrated with the process. However, some advocates working inside and outside of this process were able to contribute toward a successful EBT roll-out in Yolo.

SUGGESTIONS FOR ADVOCATES THROUGHOUT THE STATE

The State EBT Project has indicated that working with recipient advocates has been, and will be, key to ensuring the success of EBT implementation. However, your county may wait until many important decisions have already been made to request your assistance or may never contact you at all. Therefore, we encourage you to initiate the conversation with your county welfare department (CWD) regarding this important new system. Whether you have a lot of time or just a little to dedicate to the successful transition to EBT in your county, your participation is valuable to low-income families and individuals who rely upon cash assistance and/or food stamp benefits. The following ideas may help you to initiate a conversation about EBT with your county welfare department.

Call Your County EBT Contact

- Each CWD has an EBT Contact person. Call your CWD to find out who this person is. If you are unable to locate an EBT Contact person for your county, contact the State EBT Project.
- Call your County EBT Contact and introduce yourself. State why you are interested in EBT. Explain that you work with low-income populations who will be impacted by the new system of delivering benefits and would like to be involved in the EBT transition process.
- Confirm the information you have, such as: Is it true that our county has(n't) chosen to use EBT for cash benefits? Is it true that our county will roll out EBT in [month, year]? (A county roll-out schedule is attached as Appendix A.)
- Request a meeting with your county welfare department and invite other advocates who serve low-income people in your county.

Meet With Your County EBT Contact and Welfare Department

- Try to get your county welfare department to meet with advocates and recipients on a regular basis throughout the EBT transition process, starting at least several months before the scheduled roll-out date in your county.
- Ask whether your county is considering converting to EBT by mailing the cards to recipients by or requiring them to come into county offices (over-the-counter conversion). Let the county know which you think might be better for the people you serve.
- If your county has a large immigrant or homeless population, ask how your county is planning to serve these recipients.
- If your county has chosen to use cash EBT, ask how your county plans to gather community input regarding the cash access plan to ensure that everyone will be served by a nearby ATM or POS machine.

- If your county has chosen to use cash EBT, ask whether the county is thinking about requesting a countywide exemption from the three-day stagger for cash benefits distribution (see pages 15 and 35-37).
- As you think of other questions, remember that the county might not yet know the answers to your questions. These are the most important to ask, as they may surface issues that your county has not yet considered.

Work With Other Organizations Serving the Poor

- Contact other advocates who might also be interested in this topic and work with them to encourage your county to include the community in the process of making decisions concerning EBT.
- Talk to other organizations and recipients in counties that have already rolled out EBT to learn how the EBT transition process worked there.
- Include recipients by inviting them to meetings and surveying them regarding some of the decisions that your county will need to make.

Learn More About EBT

A list of EBT-related websites and contacts is included at page 84. Information about EBT is also available through the State EBT Project website at www.ebtproject.ca.gov.

SECTION THREE: County Decisions

The State requires each county to make several decisions before and during the transition to the EBT system. Additionally, there are a number of other issues each county will have to take into consideration for a successful EBT implementation. This section addresses some of these decisions and issues.

- A. Cash EBT** **Page 14**
Counties must decide whether to distribute cash assistance, in addition to food stamp benefits, through EBT. The State required counties to make an initial decision in August 2001.
- B. Reviewing the Cash Access Plan** **Page 20**
Input should be provided to the State and Citicorp about the proposed cash access plan for the county, if the county has chosen to distribute cash benefits through EBT.
- C. Conversion Process: “Mail-Based” or “Over-the-Counter”** **Page 24**
Counties must decide whether to make the initial transition to EBT by mail or over-the-counter at county benefits offices.
- D. Ongoing Card Issuance** **Page 27**
Counties must decide how to issue EBT cards to people who re-apply, are newly eligible for benefits, or need a replacement card after the initial EBT conversion.
- E. Languages of Training Materials** **Page 29**
Counties must decide which languages to choose among the Citicorp-prepared recipient training materials, and what to do for recipients whose languages are not supported.
- F. Other County Concerns** **Page 30**
In addition to the decisions required by the State, counties will have several other decisions about how best to serve their clients with the EBT system.

CASH EBT

Statewide

County Decision

All counties must distribute food stamp benefits through the EBT system, but each county has the choice of whether to also distribute cash assistance payments through EBT or to continue sending out paper checks (warrants). Initial county decisions have already been made. However, if your county has not yet chosen to distribute cash benefits through EBT, there is the possibility that the State may later allow them to do so. A county's later decision to use cash EBT will probably mean that it will be able to add cash EBT only after all California counties have rolled out.

Counties Choosing Cash EBT

Thirty-seven California counties have, thus far, chosen to distribute CalWORKs benefits through the EBT system and eleven counties have chosen to use EBT for General Assistance (GA)/General Relief (GR) benefits. The list of counties choosing to distribute cash benefits through EBT for CalWORKs and GA/GR is attached as Appendix B. Updated lists can be found on the State EBT Project website (www.ebtproject.ca.gov). Counties choosing to distribute Cash Assistance Program for Immigrants (CAPI) and/or Refugee Cash Assistance (RCA) payments through EBT are unknown to advocates at this time.

Cash Access Plans

Counties converting to cash EBT will be asked to provide input into the development of county-specific cash access plans that will be prepared by Citicorp for each cash EBT county. A cash access plan lists the ATM and POS locations where recipients can access their cash benefits and how much they may have to pay to do so. In order to ensure that recipients can easily and affordably access their cash benefits in your county, it will be imperative that your county's cash access plan include no-cost and low-cost cash access locations. To learn more about the cash access plan and how advocates can participate in the review and improvement process, see page 20, "Reviewing the Cash Access Plan."

Cash Access Costs to Recipients

Certain costs to recipients are associated with the distribution of cash benefits through the EBT system. Recipients may be subject to surcharges and transaction fees (see pages 16-17). How much or how little a recipient pays to access his or her cash benefits will depend upon (a) the locations and policies of the ATM and POS machines accepting EBT cards, and (b) the recipient's understanding of how surcharges and transaction fees are incurred. It is possible that a recipient could get all of his or her cash benefits without paying any transaction fees or surcharges or that a recipient could pay a significant portion of his or her benefits in transaction fees and surcharges (see pages 17-18).

Case-by-Case Exemptions and Other Alternatives to Cash EBT

Recipients may request to be exempted from the cash EBT system for hardship on a case-by-case basis. If granted an exemption, a recipient will continue to receive a paper check each month. (See pages 35-37 to learn more about exemptions to cash EBT.) Most counties are required by law to offer recipients the option to have their cash benefits directly deposited into their personal bank accounts. The direct deposit option may help reduce recipient costs of accessing benefits, provides for greater privacy, and allows the recipient to receive cash benefits on the first day of each month. Additionally, a recipient may choose a person to act as his or her "Designated Alternate Cardholder (DAC)." A DAC will receive an EBT card and PIN and will then have access to all of the recipient's cash benefits. See page 41 for further discussion of "Additional Cardholders."

Three-Day Cash Benefits Stagger

In counties that have chosen to use EBT for their cash aid recipients, cash benefits will become available the first three calendar days of each month. This is referred to as the "cash stagger." A recipient's availability date will depend upon the last digit of his or her case number. For further discussion of the cash stagger and exemptions to the cash stagger for hardship, see pages 35-37.

Countywide Exemption to the Three-Day Cash Benefits Stagger

State law allows each county to request a waiver of the three-day cash stagger for all of its CalWORKs recipients. (See Welfare & Institutions Code section 10072(c); MPP 16-215.61.) If the State grants the exemption, the county can then distribute cash benefits on the first day of the month, instead of over the first three days of the month. For further information, see page 35.

The pilot county of Yolo submitted a written waiver request to the California Department of Social Services for this exemption and was denied. However, state law does allow for it and if advocates and a county welfare department feel that an exemption would best serve the needs of their clients, then this exemption should be requested.

Case-by-Case Exemption to the Three-Day Cash Stagger

Recipients facing hardship due to the three-day cash stagger may request to be exempted from the stagger on case-by-case basis. If the county welfare department approves the request, the recipient will be able to access all of his or her cash benefits on the first day of each month. (See Welfare & Institutions Code sections 10072(c) & (l); MPP 16-215.62.) For further discussion, see pages 35-37.

CAPI and EBT

Due to the way the Cash Assistance Program for Immigrants (CAPI) is administered, CAPI may not be included in the list of cash benefits distributed via EBT, even if a county has chosen to use EBT for other cash benefits. See page 49 for more information about CAPI and EBT.

Surcharges

A surcharge is a fee that EBT cardholders will pay at some ATM and POS machines. Each ATM or POS machine owner has the option to provide EBT cardholders with surcharge-free cash withdrawal services. POS machine owners are not supposed to charge EBT cardholders more than they normally charge other debit card users. Typical ATM surcharges are between \$1 and \$2 per transaction. POS surcharges are usually lower, with the exception of POS machines at check cashers.

Recipients can avoid paying surcharges by withdrawing their cash benefits at surcharge-free ATMs or POS machines. Some ATMs with no surcharge include those owned by Citibank, California Federal Bank (Cal Fed), Washington Mutual Bank, and Axis ATMs (found at most 7-Eleven convenience stores and Walgreens). Other large banking institutions, such as Bank of America and Wells Fargo Bank, will charge a surcharge for EBT cash withdrawals at their ATMs. The number of surcharge-free ATMs are often limited in low-income neighborhoods – leaving some zip codes without any surcharge-free ATMs.

Each machine is supposed to notify the recipient if there will be a surcharge and how much the surcharge will be. The recipient must be allowed to cancel the transaction if he or she does not wish to pay the fee. This notice of the surcharge, however, may not be very helpful for limited English proficient (LEP) recipients.

Federal law prohibits **any** charges to recipients for using EBT for food stamp benefits.

Transaction Fees

A transaction fee is an \$0.85 fee charged by Citicorp to a recipient who makes more than four cash-only withdrawals (as opposed to cash-back with a purchase) from his or her EBT cash account in a given month. After the first four cash-only withdrawals (made at either POS machines or ATMs, or a combination of both), recipients will pay an \$0.85 transaction fee for each subsequent cash-only withdrawal made at an ATM (but not at a POS). This fee will be in addition to any surcharges. For example, after making four cash-only withdrawals at ATMs and/or POS machines, if the fifth cash-only withdrawal is made at a surcharging ATM, the recipient could pay \$2.35 for the transaction (\$1.50 surcharge, plus \$0.85 transaction fee).

Recipients can avoid paying transaction fees by withdrawing their cash at POS machines (although they may have to pay a surcharge) or by withdrawing all of their cash in four or fewer cash-only transactions per month. The State is developing a brochure to provide information to recipients on how to avoid surcharges and transaction fees. At the date of publication of this Guide, it had not been decided whether this brochure would be translated. (See Appendix I for a copy of the draft brochure.)

Recipients will also pay a \$0.25 "transaction fee" for each balance inquiry made at an ATM. There are no free balance inquiries at ATMs. However, recipients can call the

toll-free Citicorp Helpline ARU to get their account balances for free at any time, and balances should be printed on transaction receipts.

Federal law prohibits **any** charges to recipients for using EBT for food stamp benefits.

Pilot Counties are Both Cash EBT Counties

Both EBT pilot counties, Alameda and Yolo, distribute cash benefits through the EBT system. Although cash EBT seems to be successful for the majority of recipients in the pilot counties, some potential problems with the distribution of cash benefits through EBT are worth noting.

- Homebound recipients must depend on others to access their cash benefits, leaving them vulnerable to theft and abuse;
- Limited English Proficient (LEP) recipients may find it difficult or impossible to find an ATM or POS machine that can serve them in their own language;
- While recipients may select direct deposit, or may request an exemption from cash EBT for hardship (like those mentioned above), it has not proven easy for recipients in Alameda County to do so, as not all caseworkers are aware of the exemption process (see pages 33-34 to learn more about exemptions to cash EBT);
- The three-day stagger of cash benefits causes hardship for some recipients and learning about or receiving an exemption from the stagger has proven difficult for some recipients in Alameda County (see pages 15 and 35-37 to learn more about exemptions to the cash stagger);
- EBT account balances are not available at all ATMs and some recipients have reported not receiving a transaction receipt at some ATMs or a balance listed on their POS cash receipts;
- Some neighborhoods have no free ATM access to cash benefits and/or very limited surcharge access; and
- During the first two months of EBT in the pilot counties, some recipients were paying a substantial portion of their benefits for surcharges and transaction fees.

ATM Fees Paid by Recipients in Alameda County

According to the State and County EBT Project Teams, an average of \$3.46 was paid in combined surcharges and transaction fees by those recipients who used ATMs to access their cash benefits or make balance inquiries in the month of September 2002 (the second month after EBT roll-out). Alameda County's cash recipient caseload for September was approximately 17,700. Of this caseload, approximately 10,250 cases paid ATM fees and approximately 7,450 paid no ATM fees at all. The total ATM fees paid by recipients in the month of September was approximately \$35,500. Over \$71,000 was paid by recipients in Alameda County for the combined months of August and September. At this level of fees and surcharges, recipients in Alameda County will pay well in excess of \$400,000 per year in fees to commercial institutions.

The State has tracked those recipients in the pilot counties who paid over \$7.50 in fees per month. The numbers available for these recipients are combined for both Yolo and Alameda Counties. The total number of households that paid over \$7.50 in both counties is 363. Of the data available, it appears that one household (of those paying over \$7.50) paid \$7.60 per month. At the other extreme, another household paid \$44.55 per month of their household benefits to access their cash benefits. The average paid over the two month period by the 363 households paying over \$7.50 per month is \$12.92 per month. County welfare departments in the pilot counties will be contacting these 363 households to inform them of ways to reduce their costs in accessing benefits.

The above amounts paid by households do not include POS charges. In Alameda County, advocates were told that these fees are so small as to be inconsequential and that fees paid at POS locations are often included in the purchase amount and therefore cannot be detected. It is unknown how much is being paid at POS locations, but these charges could be significant in counties such as Los Angeles, where recipients rely more on check cashers. There is evidence that many check cashers will charge 1% to recipients who use their services to access cash benefits. While this 1% fee is less than what check cashers now normally charge to cash recipients' benefits checks, with EBT it will be significantly more than the fees paid by recipients who can rely on ATMs or non-check casher POS machines to access their cash benefits.

Suggestions for Advocates

- Find out whether your county has opted for cash EBT or is considering it for the future. See Appendix B for a list of cash EBT counties as of October 2002.
- Ask to be involved in the review of the template and draft cash access plans for your county. For further information, see page 20, "Reviewing the Cash Access Plan."
- Give your county suggestions of cash access locations in areas where many recipients live and potential "hidden" cash access locations so that these locations may be solicited to sign-up to accept EBT.
- Ask your county to request that the bank it does business with waive EBT surcharges.
- Advocates can also directly ask local banks to accept EBT cards and to waive surcharges for EBT.
- If your county is one of the majority of counties that offers direct deposit for cash benefits, ask your county to publicize this option and its benefits to recipients.
- Ask your county how it plans to let recipients know about seeking an exemption from, or "opting out" of, cash EBT for hardship, signing up for direct deposit, and/or receiving an exemption from the three-day cash stagger.
- Discuss with your county the option of requesting a countywide waiver to the three-day cash benefits stagger.
- Find out what will happen for CAPI recipients in your county. Will they be converting to cash EBT or not?

- Ask your county to monitor excessive fees paid at ATMs and POS machines and to have a plan for educating clients about how to minimize their costs to access their cash benefits (the threshold for contacting clients in Alameda County is \$7.50 paid in fees per month).

REVIEWING THE CASH ACCESS PLAN

Statewide

The State's contractor, Citicorp, will prepare a "cash access plan" for each county that has chosen to distribute cash benefits through the EBT system. The cash access plan will be broken down by zip codes within a county and should list every location in the county where recipients can use their EBT cards to access their cash benefits, whether there will be a surcharge, and if so, how much, and the maximum (or estimated) amount that can be withdrawn in one transaction from that location. (A sample matrix for one zip code from Alameda County's cash access plan is attached as Appendix J.)

Citicorp is required by contract to work with the State and with each cash EBT county in developing a cash access plan that meets a "minimum access" standard as outlined in the State's contract with Citicorp. State law requires that recipients have "reasonable access" to their cash benefits. The State encourages, but does not require, counties to involve the community in developing and reviewing their cash access plans.

Each cash EBT county will receive three versions of the cash access plan for the county. The first version is called a "template," the second version is called the "draft" or "first draft," and the third version is called the "final" cash access plan. The template should be delivered to each county five months prior to the county's scheduled roll-out date. A number of weeks will then be given to the county to review the template and provide input. The same process will then occur for the first draft. The final cash access plan is the version the State will use to determine if a county's cash access plan meets the contractual "minimum access" requirements, and the county and State will then use the final plan to determine if the statutory requirement of "reasonable access" has been met. This three-phase process provides opportunities for the county to seek public input on the plan.

Acceptance of a County's Cash Access Plan

As previously mentioned, Citicorp is required by contract to work with the State and with each county in developing a cash access plan that meets the "minimum access" standard as outlined in the State's contract with Citicorp. State law requires that recipients have "reasonable access" to their cash benefits. However, it is the State, and not the county, that has the final say as to whether a cash access plan for a particular county is acceptable.

Although the State has final authority to accept a cash access plan for a county, the Los Angeles County Board of Supervisors has made its decision of whether or not to be a cash EBT county contingent upon its final review of the cash access plan developed for Los Angeles. At the time of publication of this Guide, advocates were working with the county welfare department to establish the Los Angeles criteria for the County's "acceptance" of its plan.

State Measurements of “Reasonable Access”

The State has chosen three measurements to be used in determining if Citicorp has met the contractual “minimum access” standard, and ultimately, the statutory “reasonable access” standard. The measurements are: capacity, proximity, and distribution. In the event that these three measurements are not met, the State will look at “alternatives” to meet the cash access needs in a particular zip code. Unfortunately, the State is not requiring that any of the cash access locations be surcharge-free for recipients.

Provided below is a summary of the measurements of “minimum access.” For a more detailed description of the “minimum access” standard and measurements, see section 5.10 of the State’s “Invitation to Partner” located on the State EBT Project website at www.ebtproject.ca.gov.

- **Capacity** is the measurement that requires that there be enough cash available on benefit issuance days (the first three calendar days of the month) to enable recipients to withdraw the full amount of their benefits.
- **Distribution** looks at whether the cash access locations are adequately dispersed.
- **Proximity** requires that cash access locations be in zip codes where recipients live, or in neighboring zip codes.
- **Alternative Solutions** may be used to meet “minimum access” if the measurements of capacity, distribution, and proximity cannot be met. These might include using “excess cash access” in neighboring zip codes or counting places where recipients can use their EBT cards to purchase money orders or pay bills.

In Alameda County

The Alameda County EBT Advisory Committee spent a significant amount of time reviewing and debating the template and draft cash access plans. It was clear from the very beginning that there were certain zip codes where meeting “minimum access” would be problematic. Some of the challenges were:

- In some zip codes, it was agreed that there were enough ATMs and POS machines to meet the “capacity” measurement. However, there was disagreement about whether the “distribution” measurement was met, and advocates were concerned that the cash access locations were not in adequate proximity to recipients, as the machines were located far from where large numbers of recipients lived and were sometimes divided from recipients by railroads, freeways, metro rails, etc.;
- Zip codes having little or no commercial infrastructure (e.g., few banks or grocery stores) made it very difficult to find places to enlist for recipients to use their EBT cards.

- Some zip codes did not have any ATM or POS machines at all, requiring the State and Citicorp to develop “Alternative Solutions” by using ATM or POS locations in a neighboring zip code; and
- Some ATM locations were expected to absorb significant EBT use in areas where banks and ATM machines were limited, which increases the likelihood of ATM malfunctions (e.g., running out of money, running out of receipt paper, breaking down, etc.).

In addition to not meeting the “minimum access” standard in a few zip codes, the advocates on the committee were very concerned about the lack of free access in many zip codes. Advocates also found several errors in the draft plan including incorrect addresses and listings of stores or ATMs that no longer existed, which made it difficult to determine if “minimum access” was met.

Community Input Regarding the Plan

Getting community input on the cash access plan proved more difficult than anticipated. One of the first requests that advocates made of county welfare department (CWD) staff was for them to track where recipients cashed their paper checks. That way, it would be known where people were obtaining their cash benefits prior to EBT roll-out, and an effort could be made to ensure that those areas were well-served by the plan. This request was considered to be too time consuming and was denied by the CWD.

Without having the paper checks traced, it was more difficult to determine where recipients would need to have cash access locations. Advocates and the CWD conducted some surveys and found some locations that stood out as locations that would need to be included in the cash access plan (see Appendix K for a copy of the survey). There were also a few surprises about where people cashed their checks (e.g., meat markets and furniture rental stores). Many people cashed their checks for free through friends or relatives.

Another way that the CWD and advocates had hoped to get community input was through community forums. In Alameda County, the Board of Supervisors worked with the CWD to offer twelve community forums throughout the county. The main purpose of the forums was to present and discuss the cash access plan and to solicit community input. All recipients were mailed a multilingual invitation to the forums one to two weeks prior to the forum dates. The turnout for the forums was very good, with the majority of the attendees being recipients. The CWD offered a presentation about EBT, showed the training video (both with interpretation services) and surveyed recipients about their pre-EBT cash access habits. With over 800 surveys collected, the CWD learned where many recipients cashed their checks, how many paid fees, and how much in fees were paid.

However, since this was the first series of forums for recipients about EBT, forum attendees were more interested in learning about EBT, in general, than in providing input into the cash access plan. Although the community forums might not have been

as successful at soliciting feedback on the cash access plan as intended, they were successful at educating the community, and recipients in particular, about EBT. In addition, they helped to educate the CWD staff about the many questions that recipients had with regard to EBT. (See page 62 to learn more about community forums.)

Accepting the Cash Access Plan

While it was only a formality, as the State has the ultimate authority about whether to accept or reject a county's cash access plan, the Advisory Committee was unable to reach a consensus about whether or not to recommend the acceptance of the cash access plan for Alameda County. This was one of the rare occasions when consensus could not be reached and a vote was called. The majority voted to recommend rejection of the cash access plan.

At a one-and-a half hour session, the Board of Supervisors heard from advocates about their concerns, from the State EBT Team about their commitment to continue working to improve cash access in Alameda County, and from the county welfare department (CWD) staff about their confidence that the plan would improve over time. In the end, and against the recommendation of the advocates, the Board and the CWD recommended to the State that it accept the cash access plan for Alameda County.

The Cash Access Plan in Action

The cash access plan did get better over time, but advocates still feel that there is room for additional improvement. During the cash access plan debate in Alameda County, advocates had estimated that under the plan presented, recipients would pay approximately \$70,000 per month in ATM transaction fees and surcharges. The actual amount paid by recipients at ATMs to access their cash benefits has been roughly \$35,500 for each of the first two months of EBT. (For further discussion, see pages 17-18, "ATM Fees Paid by Recipients in Alameda County.")

Although the cost to recipients to access their cash benefits has been about half of what advocates had estimated, it is still substantial. It is unknown whether combined transaction fees and surcharges paid by recipients in Alameda County are less than they paid to cash their benefits checks prior to EBT, however, the goal to minimize the cost to recipients should still be pursued.

Suggestions for Advocates

- Ask to be involved in the review of the template and draft cash access plans for your county.
- See "Suggestions for Advocates" under "CASH EBT" for additional suggestions (pages 18-19.)

CONVERSION PROCESS: “MAIL-BASED” or “OVER-THE-COUNTER”

Statewide

“Conversion” refers to the process whereby a county’s recipient caseload will initially be transitioned to the EBT system. All current recipients at the time of a county’s conversion must receive their EBT cards, PINs, and training materials. Each county must choose a “mail-based” conversion or an “over-the-counter” conversion methodology. While one primary method must be chosen, a county could choose to have some groups (e.g., CalWORKs cases) converted by one method and another group or subgroup (e.g., GA homeless cases) converted by another method.

Citicorp is required by State contract to convert each county’s caseload. If a county chooses to distribute EBT cards, PINs, and training materials in the county office(s), the Quest Group (a Citicorp subcontractor) must provide staff to assist the county with the over-the-counter conversion. If a county chooses mail-based conversion, Citicorp will mail EBT cards and training materials to recipients within the month prior to the county’s scheduled roll-out date. Citicorp will send PINs in a separate mailing approximately two to three days after sending out the cards and training materials. If a county chooses to do so, it may send a follow-up notice letting recipients know that they should have received their EBT cards and PINs, and what to do if they have not. The Quest Group will also staff walk-in training centers in mail-based conversion counties. See Section Five for a discussion on recipient training based on the method of conversion chosen.

In Alameda County

The Alameda County EBT Advisory Committee voted, nearly unanimously, to mail EBT cards, PINs, and training materials. This meant that cards would be mailed out within the month prior to roll-out with two pieces of training materials: a twelve page pamphlet and a wallet card. Approximately two to three days later, recipients were mailed their PINs.

The mail-based conversion got off to a rocky start in Alameda because of a miscommunication about when the cards and PINs would be sent to recipients. The County sent out a notice to recipients to let them know that if they had not yet received their cards, they should call or come into a benefits office. Unfortunately, since recipients were sent this notice prior to receiving their cards, many recipients came into the county offices or called to get additional cards. This resulted in many people getting duplicate cards and not knowing which card to use during the first week of roll-out.

In addition to the miscommunication between the State, Citicorp and the County about when EBT cards would be distributed, there was also concern that the out-of-state return address on the envelopes containing the cards, PINs, and training materials was confusing to recipients. Additionally, some recipients reported destroying their first EBT card because they did not “want a credit card.”

The biggest concern regarding mail-based conversion was theft of the EBT cards and/or PINs, as mail theft is not uncommon in Alameda County. While mail theft appeared to be a minimal problem, the process for replacing a card and/or PIN was sometimes complicated for those who were victims of mail theft.

Although the County EBT Team had established a convenient system of card replacement, which was supposed to allow recipients to receive a same-day replacement card at benefits offices, this was not the experience that many recipients reported. Some County staff did not understand this policy and instead made recipients wait to receive their replacement cards in the mail. During the pilot, while replacement cards were supposed to be received within three business days, some cards took up to seven to ten days to arrive. In addition, for those who reported multiple card thefts or losses, the policies regarding multiple card replacement were not clear.

Most of the county's 30,000-plus recipients received their cards through the mail. However, exceptions were made for homeless recipients and some disabled GA recipients, who were asked to come into benefits offices for training and for EBT card and PIN issuance. Notices of appointments were put in the envelopes with benefits checks one month prior to the roll-out date. For the 2,389 Alameda County recipients who were scheduled to come into a benefits office to convert to EBT, only 43.2% had attended their appointments by roll-out. This left 1,356 recipients without their EBT cards, PINs, or training materials. The majority of these "no-shows" were homeless. Follow-up with this population was difficult.

Regardless of the problems during the mail-based conversion, both advocates and County staff agree that mail-based conversion was the right decision for a county the size of Alameda, with 19,789 people receiving cash assistance benefits and 20,738 people receiving food stamp benefits (with substantial overlap in the numbers of people receiving both cash and food stamp benefits). Over-the-counter conversion would have been a very difficult feat, considering that County staff struggled to assist those 10% to 20% of the caseload that had problems during the first week of conversion.

In Yolo County

Yolo County chose an over-the-counter conversion for their 3,000-plus caseload. Recipients were sent an appointment letter telling them when and where to pick up their EBT cards, select their PINs, and view a training video, if they desired. Appointments were scheduled over several days in the month prior to the roll-out date. The majority of recipients made it to their scheduled appointments; however, after all appointment days were over, approximately 30% of recipients still had not picked up their cards and PINs. County staff made it a priority to contact these recipients and were able to ensure that the vast majority of recipients had received their EBT materials prior to the "go-live" date of August 1, 2002.

Yolo County staff provided a county helpline and help desk throughout the first month of conversion and scheduled staff lunches to avoid closing services during the day. Yolo County advocates and County staff agree that over-the-counter conversion worked best for this county.

Suggestions for Advocates

- Make sure that advocates and recipients are included in the decision about mail-based versus over-the-counter conversion.
- Based on the limited experiences of the pilot counties, generally, over-the-counter conversion works better for smaller counties and mail-based conversion works better for larger counties.
- Encourage your county to work with the State and Citicorp to develop a calendar of when mailings will be sent to recipients in the month prior to the roll-out date.
- Ask your county to produce an updated list of cases by language preference to help determine necessary translation and interpretation services.
- Ask your county to develop a special conversion plan for homeless, disabled, LEP, and other special needs populations.
- If your county chooses mail-based conversion, ask the county to work with advocates to develop a list of recipient populations who may need to be “excepted” from mail-based conversion and develop a plan to ensure high turn-out for scheduled over-the-counter conversion appointments.
- For mail-based conversion counties, ask your county to send a follow-up notice to let recipients know that they should have received their EBT cards and PINs in the mail, and if they have not, to contact the county welfare department.
- Encourage your county to develop a plan ensuring that the extra flow of recipients in benefits offices can be accommodated during the first week of roll-out that includes special considerations for the disabled, limited English proficient (LEP) speakers, the working, etc.
- Ask your county to keep track of what percentage of recipients keep their conversion appointments, and have a follow-up plan for those who do not.
- Work with your county to develop a plan for following up with recipients who appear on the 10- and 30-day non-use reports after conversion.
- Request that your county establish a county helpline and help desk no matter what conversion method they choose.

ONGOING CARD ISSUANCE

Statewide

Each county must decide how it will distribute EBT cards and PINs to people who re-apply, are newly eligible for benefits, or need replacement cards after the county's initial conversion to EBT. Counties can choose to issue cards over-the-counter in their benefits offices or have them issued through the mail by Citicorp. Counties may also choose to use some combination of the two issuance methods. The county does not have to choose the same issuance method as was used during the initial county conversion.

According to the County Readiness Guide (May 15, 2002), when Citicorp receives a request for a new card, the card "must be delivered to the postal facility no later than the next business day following the receipt of the card issuance request by the county." This means that it will take at least two business days for the recipient to receive the card after Citicorp has received the request from the county. Then, it will take an additional day or two for the recipient to receive the PIN for the card. (p. 77) While these are the timelines that Citicorp must follow in mailing out a card and PIN, they do not take into consideration possible delays in postal delivery. Additionally, during the first months of roll-out in the pilot counties, Citicorp has not been able to meet the contractual guidelines for card delivery. The State EBT Project Team is working with Citicorp to correct this problem.

New EBT cards issued by the county in a county benefits office may be issued as soon as eligibility is determined and the account has been entered into the EBT system. This is especially important for the timely distribution of expedited (emergency) food stamp benefits.

Replacement cards issued through the mail by Citicorp are supposed to be received by the recipient within three business days of a card being reported lost, stolen, or damaged. Counties may choose to issue replacement cards over-the-counter so that the recipient may get a replacement card sooner than if replaced by mail. There is no cost to the recipient for a replacement card.

In Alameda County

Alameda County chose to continue issuing new cards by mail. However, they equipped all of their seven benefits offices with the equipment to issue replacement cards and cards for recipients of emergency assistance (e.g., expedited food stamps).

At the time this Guide was prepared, the pilot evaluation process was still underway, and we cannot say how the ongoing issuance via mail is working. In general, however, there have been reports of the cards taking as long as ten days to be received. Additionally, some people applying for emergency food stamp benefits have reported that they have had to return to the office on several occasions to receive an EBT card.

During the EBT conversion in Alameda County, it became very apparent that there are many day-to-day processes performed by county workers that are affected by the new EBT system, including ongoing benefits issuance. In the attempt to have a successful and timely conversion to the new system, preparing protocols for these processes and ensuring that staff are well trained may take a back seat. Yet, in the long run, it will be these processes and creating a successful ongoing issuance protocol that will be most important to the Food Stamp and cash aid programs and recipients.

Suggestions for Advocates

- Participate in your county's decision to have mail-based or over-the-counter ongoing issuance.
- Advocate for all of your county benefits offices to be equipped to offer EBT card and PIN replacement on-site during all hours of operation.
- Ask your county to prepare a plan, not just choose a method, for ongoing issuance. The plan should include issuing replacement cards, cards for emergency benefits, cards for the homebound, cards for the homeless, and additional cardholders. Additionally, the plan should include strategies for training new enrollees, especially those with special needs (e.g., LEP, homeless, disabled, homebound, etc.).

LANGUAGES OF TRAINING MATERIALS

Statewide

Written EBT training materials available from the State are a brochure, a wallet card, and a poster for county benefits offices. The written materials are provided in ten languages: English, Spanish, Chinese (Cantonese/Mandarin), Vietnamese, Cambodian, Russian, Hmong, Lao, Farsi, and Eastern Armenian. The EBT training video is available in these languages, including both Mandarin and Cantonese. These languages were chosen because they are spoken by a significant percentage of the statewide caseload. Each county must decide in which of the available languages they would like to have training materials for their clients.

In Alameda County

Alameda County chose to have all training materials in all available languages. The County is still in the process of developing a plan to ensure translation and interpretation for EBT services and materials not provided by the State and is committed to ensuring that no one is underserved due to language barriers. The County is currently developing a plan to serve limited English proficient (LEP) recipients, especially those whose languages are not supported by Citicorp.

Suggestions for Advocates

- Ask your county to update its list of cases by language preference.
- Make sure your county chooses as many translated training materials as is necessary for your county's recipient population.
- Ask your county to translate the materials in additional languages, if necessary.
- Help your county to distribute these materials, especially if your organization serves low-income immigrants.

OTHER COUNTY CONCERNS

Potential Problem Areas

In addition to the decisions that the State requires each county to make, counties should also be encouraged to consider and plan for potential problem areas. Some of these areas include:

- What to do for recipients who will be affected by the change to a uniform food stamp stagger (see page 38);
- Training for recipients with special needs (see page 45);
- Additional outreach to ethnic retailers to ensure that they learn about and sign up for EBT;
- Getting cards and PINs to homeless recipients (see pages 44 and 70); and
- Helping drug rehabilitation facilities, transitional shelters, and other group living facilities transition to EBT (see page 55).

Process-Related Issues

Counties will also have to answer a number of process-related questions, such as:

- How many notices should be sent to recipients in advance of EBT roll-out and what should they say?
- What materials (e.g., direct deposit applications, cash exemption forms, etc.) should be made available to recipients through the mail and/or at trainings?
- What additional training materials may be needed?
- Into which languages should additional training materials be translated?
- How can (additional) training materials best be distributed?
- How will recipients be educated about avoiding transaction fees and surcharges?
- What additional training should be provided to county staff (e.g., on which types of inquiries to handle and which to refer to Citicorp, being familiar with and understanding all client EBT forms, etc.)?
- How will the CWD handle additional calls resulting from EBT?
- How will additional traffic in benefits offices after EBT roll-out be handled? and
- Which county staff will have access to EBT-specific information?

Food Stamp Coupons Can Still Be Used

An additional important note for all counties to consider is that all FNS certified retailers must continue to accept paper food stamp coupons, even after a county has transitioned to EBT, until notice is given by the USDA that permits retailers to stop accepting paper coupons. This notice will probably be issued several years after 2002. In Alameda County, advocates have heard reports of some FNS certified retailers already refusing to accept paper food stamp coupons.

After learning of this, the State EBT Project Director sent a letter to Authorized Food Stamp Retailers reminding them of the requirement to continue to accept paper food stamp coupons. Counties will need to decide how they will educate retailers about this policy. (See Appendix L for a copy of this letter.)

SECTION FOUR: Additional Considerations

In addition to the county decisions and concerns discussed in Section Three, each county will have several issues to consider before and during conversion to the EBT system, which will greatly affect services to recipients. Advocates should be aware of these issues so that they can work with their county welfare departments to offer the best EBT system possible to all recipients.

- A. Exemptions to Cash EBT** **Page 33**
Counties can offer recipients exemptions to cash EBT on a case-by-case basis for hardship.
- B. Three-Day Cash Benefits Stagger** **Page 35**
Cash benefits will become available to recipients in the first three days of each month. As a result, some recipients will not receive their cash benefits until the second or third day of the month.
- C. Ten-Day Food Stamp Benefits Stagger** **Page 38**
Food stamp benefits will become available to recipients in the first 10 days of each month. In some counties, the food stamp stagger will be different and may result in a substantial disruption in food stamp benefits for some recipients during roll-out.
- D. Additional Cardholders** **Page 41**
Some recipients may need assistance using the EBT system. One solution for these recipients will include designating another individual to receive an EBT card and PIN, with authority to access the recipient's benefits.
- E. Recipients with Special Needs** **Page 44**
Homeless, elderly, homebound, and disabled recipients will have challenges with regard to the EBT system that need to be addressed prior to roll-out in each county.
- F. Limited English Proficient (LEP) Recipients** **Page 46**
LEP recipients have unique challenges with regard to the EBT system that need to be addressed prior to roll-out.
- G. Cash Assistance Program for Immigrants (CAPI)** **Page 49**
The CAPI program in your county may be administered by another county and, therefore, recipients may receive their cash benefits by EBT even if yours is a food stamp-only county.

- H. Citicorp Helpline** **Page 51**
The Citicorp Helpline is a 24-hour toll-free service that uses an Automated Response Unit (ARU) and Customer Service Representatives (CSRs) to assist recipients with EBT-related issues. The Helpline “supports” eleven languages, but it has limitations.
- I. Group Living Facilities** **Page 55**
EBT will mean a change in the way many group living facilities use food stamp benefits.
- J. Farmers' Markets** **Page 57**
EBT presents additional challenges for farmers and farmers' markets, that have yet to be successfully resolved in California.
- K. Personal Security, Privacy, and Fraud** **Page 59**
Using the EBT card exposes recipients to a different set of personal security issues. Recipients and advocates have also expressed concerns about privacy issues and fraud investigations.

EXEMPTIONS TO CASH EBT

Statewide

In those counties that have chosen to use EBT for their cash aid recipients, recipients may request to be exempted from the cash EBT system for hardship. According to state regulations, a recipient may be granted an exemption to cash EBT, and can continue to receive a paper check (warrant) if he or she is unable to use the EBT system due to a permanent or temporary physical or mental condition that prevents "successful" use of the EBT system, or due to "other barriers." The recipient will have to provide verification of the reason he or she is requesting an exemption and he or she will only be granted an exemption after "consideration of other available alternatives." (See MPP 16-325.) One of the "other available alternatives" in many counties is direct deposit of the recipient's benefits into his or her personal bank account.

In mid-August 2002, the same month the pilot counties rolled out EBT, the State developed a form that could be used by recipients wishing to request an exemption to cash EBT for hardship. This form may not be as client-friendly as the form developed by Alameda County with the input of advocates. A substitute to the State form is permitted by the State. (See Appendices M and Q for copies of the State and county-developed forms.)

In Alameda County

In Alameda County, advocates had a long discussion early on about the process recipients would have to follow to receive an exemption to cash EBT. Advocates had requested that the County and the State allow certain groups, such as the mentally disabled, homebound, or elderly immigrants, to be automatically exempted as a group. The State indicated that it would not allow for these types of "group exemptions." The State will only allow for "case-by-case" exemptions from cash EBT.

Recipients were informed about their ability to "opt-out" of (or receive an exemption from) cash EBT for hardship in one of the six client mailers that were distributed prior to EBT roll-out. However, there was no information about this option at the client trainings and the forms have not been readily available to recipients. Advocates have reported that some County staff (even management) are not aware of this option. With all of the new procedures that staff will be expected to follow with EBT implementation, exemption from cash EBT may not get the attention it should. Yet, it is something that is very important for the minority of recipients who will be unable to successfully access their cash benefits using EBT.

Prior to EBT roll-out, Alameda County developed and translated its own form, with the input of the EBT Advisory Committee, as the State had not yet developed a form for cash exemption requests. Alameda County advocates feel that this county-developed form is more useful for recipients than that developed by the State. (See Appendix M for a copy of the County form.)

“Opt-In” Option for GA/GR Recipients

Just five months prior to roll-out, Alameda County advocates learned that the County had the option to treat General Assistance (GA) recipients differently with regard to cash EBT, because GA is a county-administered program, unlike CalWORKs. One of the requests that advocates made was for the County to allow GA recipients, or a subgroup of GA recipients, such as elderly or LEP recipients, to be able to "opt-in" to cash EBT rather than "opt-out." This request was made because a large percentage of GA recipients are disabled, elderly, LEP, or have low literacy skills, making it more difficult for them to maneuver the cash EBT "opt-out," or "exemption" process. Advocates felt that it would be much easier for those GA recipients who wished to do so to "opt-in," rather than have those who were less able "opt-out." The request was denied in Alameda County, but it is an option that other counties could consider.

Suggestions for Advocates

- Suggest that your county use the Alameda County "Request for Exemption From Cash EBT" form (Form # 50-124) as a model rather than the State form.
- Ask your county to make sure that these forms (and relevant translations) are available to recipients at all recipient trainings and in all benefits offices during roll-out.
- Ask your county to specify their plan to make sure county workers know about the cash exemption for hardship option.
- Get copies of the exemption request form to assist your own clients in applying for the exemption when needed.
- Talk to your county about choosing an "opt-in" approach for GA/GR recipients.

THREE-DAY CASH BENEFITS STAGGER

Statewide

State law requires that CalWORKs benefits delivered through EBT be staggered over the first three calendar days of the month. (See Welfare & Institutions Code section 10072(c).) This stagger uses the last digit of the recipient's case number to determine which day of the month the recipient will first be able to access his or her cash assistance benefits. A recipient whose case number ends with the digit 1, 2 or 3 will be able to access his or her cash on the 1st day of each month, while those who have case numbers ending in 8, 9 or 0 will be able to access their cash on the 3rd day of each month. Please see the table below that appears on page 10 of the State's EBT training brochure.

| Case Numbers Ending In: | Receive Benefits on: |
|--------------------------------|----------------------------------|
| 1, 2, or 3 | 1 st day of the month |
| 4, 5, 6, or 7 | 2 nd day of the month |
| 8, 9 or 0 | 3 rd day of the month |

Case-by Case Exemption for Hardship

For many recipients throughout the state, this cash stagger system will be new and will merely require some adjustment. However, for some recipients, not having access to their cash benefits on the first day of each month will be a hardship. If a recipient needs to pay rent, child care, or other important bills on the 1st of each month, waiting until the 3rd could pose a serious problem. For recipients facing such hardship, State law allows counties to exempt recipients on a case-by-case basis from the cash stagger and to provide benefits to those recipients on the first day of the month. (See Welfare & Institutions Code sections 10072(c) & (l); MPP 16-215.62.) In most counties, choosing direct deposit may offer recipients another way to avoid problems related to cash stagger.

Countywide Exemption to the Stagger

State law allows a county to request a countywide exemption to the three-day cash benefits stagger so that they may issue cash benefits in a shorter time frame. (See Welfare & Institutions Code sections 10072(c); MPP 16-215.61.) The county must submit a written waiver request to the California Department of Social Services. (See page 15 for further discussion.)

In Alameda County

Alameda County sent out an explanation of the cash stagger with benefits checks three months prior to roll-out. This notice (Appendix V) also included information about the 10-day food stamp stagger and explained how to determine the last number of the recipient's case number, as many recipients do not know their case numbers.

One month before roll-out, the County sent another reminder about the cash stagger to recipients, letting them know how they could apply for an exemption to the cash stagger for hardship. To the dismay of advocates, this notice informed recipients that in order to get the exemption, they would need a statement from their landlord confirming that their rent was due on the first and it would not be accepted any later. Advocates worked hard to change the County's process to one that was in line with the more broad State regulation which says, "Hardship includes, but is not limited to, the incurrence of late charges on an individual's housing payments." (See MPP 16-215.62.) Eventually, the cash stagger exemption form was changed to let recipients know that due dates imposed by **any** creditor, not just landlords, could constitute a hardship and that recipients need not obtain a statement from the creditor to apply for the exemption. The County's "EBT Card and PIN Responsibility Statement" now reads:

Cash benefits will now be issued over the first three (3) days of each month, depending on your case number. However, a hardship will allow you to continue to get your cash aid on the first of every month. To be approved for a hardship you must:

- Give your worker a sworn statement that you will suffer a hardship if you do not receive your cash aid on the first of the month; **or**,
- Give your worker a statement from your landlord or other creditor (Form 50-125) that says you must pay your rent or other payment on the first of every month.

Alameda County has also developed a corresponding "Exemption from Cash EBT Stagger" form (Appendix N) that allows a recipient to request an exemption to cash stagger by making a sworn statement. There is no exemption to the 10-day food stamp stagger.

Upon roll-out of EBT, the cash stagger and insufficient training about the stagger were very problematic for recipients, merchants, and county staff. Many recipients whose benefits were not available until day three were trying to access their benefits on day one. In addition, the Citicorp Helpline was unable to assist recipients who called on day one if their benefits were not available until day two or day three, because the Helpline system does not recognize accounts until benefits are initially posted. The State is currently looking into reducing confusion by reprogramming the ARU to give a "zero" balance when benefits are pending, but not yet posted. The possible message may be: "Your food stamp balance is zero" and/or "Your cash account balance is zero." Hopefully, this (potential) change to the ARU will help alleviate confusion for recipients in future EBT counties.

Suggestions for Advocates

- Request that your county inform recipients (in appropriate languages) of the cash stagger and how to apply for an exemption well in advance of roll-out.

- Make sure that your county has a form that allows recipients to request an exemption from cash stagger with only a sworn statement and that this form is translated in all necessary languages. Request to review these forms.
- Prior to roll-out, ask your county to inform recipients that information about their accounts will not be available on the Helpline until benefits are first posted on their cash stagger day.
- Ask your county how they will be training caseworkers to inform recipients of their right to request an exemption to the cash stagger for hardship.
- Make sure that each of the training appointment letters and walk-in sites have reminders about cash stagger, information about how to request an exemption to cash stagger, and forms to do so.
- Ask the State to ensure that recipients are able to access all services on the Citicorp Helpline beginning day one of your county's roll-out or before – no matter what the recipient's cash stagger day is.
- Discuss with your county the option of requesting a countywide waiver to the three-day cash benefits stagger.

TEN-DAY FOOD STAMP BENEFITS STAGGER

Statewide

As EBT rolls out, state policy requires all counties throughout the state to distribute food stamps on a uniform 10-day stagger schedule. (See Appendix W.) This stagger uses the last digit of the recipient's case number to determine the first day the recipient will be able to access his or her food stamp benefits. A recipient whose case number ends in the digit "1" will be able to start accessing food stamp benefits the 1st day of each month, while those who have case numbers ending in "0" will be able to start accessing benefits on the 10th day of each month. Please see the table below that appears on page 10 of the State's EBT training brochure.

| Case Numbers Ending In: | Receive Food Stamp Benefits on: |
|-------------------------|---------------------------------|
| 1 | 1 st day of month |
| 2 | 2 nd day of month |
| 3 | 3 rd day of month |
| 4 | 4 th day of month |
| 5 | 5 th day of month |
| 6 | 6 th day of month |
| 7 | 7 th day of month |
| 8 | 8 th day of month |
| 9 | 9 th day of month |
| 0 | 10 th day of month |

The State consulted with counties about their current practices and developed this stagger schedule to have the least impact on counties and recipients throughout the state; however, for some counties, moving to this new stagger schedule will be difficult for recipients. Although these counties may have distributed food stamps on a 10-day stagger before EBT, the stagger may have been based on recipients' names or activation dates rather than their case numbers. Even in counties where the 10-day food stamp stagger used case numbers to determine availability dates, some had set the stagger in reverse so that recipients whose case numbers ended in a "0" received their benefits on the 1st day of each month, rather than the 10th.

Some recipients in counties where the food stamp stagger will be changed may find this transition problematic. Of particular concern is the fact that some recipients who may have received their food stamps on the 1st or 2nd day of each month will now not receive their benefits until the 9th or 10th day of each month. For the first month of EBT, this change could mean that the recipient's food stamp allotment will be expected to last an additional nine days. Food stamp benefits currently only last families an average of two-and-a-half weeks, which means that unless the State and county intervene with an extra nine day supply of emergency food stamps, or some other alternative, families are likely to go hungry during this transition period.

In Alameda County

In Alameda County, food stamp recipients were not affected by the State's new uniform stagger policy. Food stamps in Alameda County have been distributed using the same stagger schedule as described above for the past ten years. Everyone could expect to have their food stamp benefits available through their EBT cards on the same day they had picked up their food stamp coupons the month before. The only difference after EBT roll-out was that recipients no longer had to go into the benefits office, or the check casher that the County contracted with, to pick up their coupons. In this respect, food stamp use with the EBT card should be easier for most recipients.

Regardless of the fact that the food stamp stagger in Alameda County did not change with the EBT system, the stagger presented one of the biggest problems during roll-out. Recipients thought that because they had their cards, and perhaps their cash benefits, that their food stamp benefits would also be available on the first day of the month. This caused a great deal of confusion at grocery stores and benefits offices across the county during the first 10 days of roll-out. The State has since created a benefits stagger "cheat-sheet" for merchants that will hopefully alleviate some of the confusion. (See Appendix X.)

In Yolo County

In Yolo County, moving to the uniform EBT food stamp stagger was a more complicated issue than in Alameda County, because the new stagger was different than the one they had previously been using. At one point, the County had considered the problem of those with up to a nine-day gap in services solved because the local food bank offered to give out bags of food to recipients. After much discussion, the County felt that it was not fair to put the additional burden on the community and the County asked the State if the County could provide additional food stamp benefits to those affected by the changed stagger schedule. The State responded that Food Stamp Program regulations would not allow this option.

The County did not do any additional outreach to those who would be affected by the stagger to propose solutions. However, they did respond to those clients who, on their own initiative, asked the County for help. Ten households requested help. Two of those households met the criteria to have expedited services (emergency food stamps) and were able to get their benefits sooner than their stagger date. Unfortunately, these were not "extra" benefits, so the recipients were still faced with the same problem the following month. The County referred those recipients who did not meet the criteria for early release of food stamp benefits to the local food bank.

Suggestions for Advocates

- Find out soon whether your county will have a new food stamp stagger schedule for some or all recipients as a result of the change to a uniform statewide stagger.
- If your county will be changing the food stamp stagger, ask your county to develop and explain their plan to serve those people who will be without benefits for an additional one to nine days as a result of the change.

- If your county will be changing the food stamp stagger, ask that they inform recipients well in advance of EBT implementation.
- To avoid the confusion that happened in Alameda County, even in counties where the stagger does not change, make sure that your county has a plan to remind recipients that the stagger will still exist with the new EBT system.

ADDITIONAL CARDHOLDERS

Statewide

State regulations permit the primary cardholder/recipient to allow other adult household members to receive their own EBT cards and PINs and to access the primary cardholder's account. A recipient who is unable to maneuver the EBT system is also permitted to designate a person(s) outside of the household to receive his or her own EBT card and PIN and to access the recipient's benefits. The primary cardholder/recipient will have the option to allow access to food stamp benefits, cash benefits, or both types of aid; however, he or she will be unable to limit access to a specific dollar amount.

Other Adults in the Household

State regulations allow for additional household members, at the option of the primary cardholder, to have their own EBT cards and PINs to access the primary cardholder's benefits. (See MPP 16-505.) State policy says that the additional household member must be an adult. (See Appendix Y.) The additional cardholder will have full access to the household's food stamp benefits, cash benefits, or both, depending upon the authorization given. Access to a limited dollar amount is not permitted.

Cardholders Outside of the Household

For some instances in which a recipient will not be able to maneuver the EBT system, he or she may need to designate a person outside of his or her household to receive an EBT card and PIN and to act on his or her behalf. State regulations say that this other person must be a responsible adult, but that if the county welfare department determines that there is no responsible adult available, the recipient may designate a minor. (See MPP 16-505.22.) This person is referred to as an "Authorized Representative (AR)" for food stamp benefits or a "Designated Alternate Cardholder (DAC)" for cash benefits.

An AR receives an EBT card and PIN and is authorized to make food stamp purchases on behalf of the recipient. ARs have complete access to all of the recipient's food stamp benefits. ARs may also be used as an alternative for group living facilities, such as shelters or drug rehabilitation facilities, enabling staff to make food stamp purchases for the residents of the facility. (See page 55 for a discussion of group living facilities.)

A DAC receives an EBT card and PIN and is authorized to access the recipient's cash benefits. DACs have complete access to all of the recipient's cash benefits.

A recipient could choose to designate one person to act as both AR and DAC, or could choose one person as his or her AR and another as his or her DAC. ARs and DACs will be issued their own cards with their own primary account numbers (PANs) and PINs. If a designated person acts as both AR and DAC, that person will receive one card and PIN with both types of benefits accessible through the card.

The EBT system currently **will not limit access to a dollar amount** for either type of benefit. In the case of a person who is acting as both a recipient's AR and DAC, that AR/DAC will have total access to **all** of the recipient's food stamp and cash benefits.

Such complete access to a recipient's account is a change from the pre-EBT process in which, for example, an AR could be given a \$20 food stamp coupon to purchase items on behalf of the recipient, or limited cash could be given to a neighbor or child to make a purchase. If ARs or DACs misuse any or all of the benefits, benefits will not be replaced.

Because EBT implementation increases the vulnerability of recipients dependent upon ARs and DACs, many advocates around the state have been asking the State to consider a concept called, the "kiddie card" or "kid card." A kid card could be given to a child or a neighbor, who would have access to a limited dollar amount of the recipient's benefits. This request has been denied by the State, but advocates hope that with enough evidence of how harmful not having the option of a kid card could be to recipients, the State may reconsider.

The State has, however, encouraged counties to incorporate training regarding an AR's unlimited access to benefits through the EBT system and to develop a procedure for confirming the AR designation of each recipient. Presumably, this recommendation also applies to DACs.

In Alameda County

Alameda County's welfare department staff thought it very important that recipients who had an AR fully understand how the new EBT system would impact them. They made an effort to contact each case with an AR and cleaned up many of the case files. They found that some of the AR information was outdated. This was important because the EBT system would require full training of the recipient and the AR. This project was larger than first anticipated, with over 3,000 AR cases to review.

In addition to addressing the situation of recipients with ARs prior to EBT roll-out, the County had to consider recipients that might now need to designate ARs or DACs because they are unable to use the new EBT system. As mentioned above, homebound, LEP, and disabled recipients have benefit access barriers that are enhanced by EBT. For recipients unable to access benefits due to language barriers or disability, State and County officials have recommended that recipients designate an AR and/or DAC. It should be noted, however, that designating ARs or DACs could make these recipients more susceptible to abuse.

One problem that the County had in designing a system for recipients to sign up for ARs prior to EBT roll-out was that the County had to develop a new form for designating an AR that related to the new EBT process. Unfortunately, with all that the County had to accomplish during roll-out, the translations of the forms were not completed prior to EBT roll-out.

Suggestions for Advocates

- Ask your county if they will be reviewing their database for ARs and Protective Payees and recommend that they get an early start.
- Ask your county whether they will be creating a form (with necessary translations) that informs recipients of the complete access that ARs/DACs will have to benefits with the EBT system.
- Ask your county if they have prepared an Additional Cardholder designation form or if they plan to use the State-developed form. You may wish to review the Alameda County form and offer it to your county as a starting point.
- Ask your county whether the Additional Cardholder form will be available in all necessary translations well in advance of roll-out. Make sure that these forms are available at all recipient trainings.
- Document stories of those in your county that could benefit from a "kid card" and share them with county and State officials.

RECIPIENTS WITH SPECIAL NEEDS

Statewide

Special needs populations include any recipient group that might need special consideration with regard to EBT, including: the homeless, limited English proficient (LEP) recipients, recipients with low-literacy skills, the elderly, the physically disabled, the mentally disabled, homebound recipients, and survivors of domestic violence. In general, it is these recipient populations who will need the most attention to ensure that EBT works well for everyone. As the State has developed very few processes to address the special needs of these populations, it is up to the counties to develop plans to meet the needs of their most vulnerable clients.

In Alameda County

There were several lessons learned from the experience of rolling out EBT to people with special needs in Alameda County.

First, a major concern with regard to special needs populations is that the process for cash EBT exemption (or "opt-out") for hardship was not well-publicized or easy to access. While we believe the Alameda County form (see Appendix M) is more client-friendly than the State form, due to the collaboration between the County and community in developing this form, it is still not readily available at county offices and two months after roll-out, some staff were still not familiar with the exemption process. One thing Alameda County did do was to include notice of the exemption option in the client mailings. This notice inclusion was in response to a request made by advocates.

A second concern with regard to special needs populations was that those who may be least able to request an exemption from cash EBT would also be those who needed it the most. Alameda County advocates requested a categorical exemption for certain special needs populations (*e.g.*, homeless, GA with SSI pending, elderly LEP); however, neither the County nor the State supported this option. Based on non-use reports, it appears that this might have been a more successful strategy to take with the homeless population. (See page 34 for further discussion of the "opt-in" approach.)

Other significant concerns are about access issues that affect all recipients, but that have an added impact for people with special needs. These include:

- County staff, especially frontline staff, were not trained on how to assist people with special needs issues to access EBT and to identify good cases for exemptions from cash EBT or the three-day cash stagger.
- The overwhelming number of recipients going into benefits offices needing help with EBT, and insufficient frontline staff during the first weeks of roll-out, caused recipients to wait for several hours – sometimes requiring them to return on subsequent days. During these first hectic days, seats were not available to serve all those who needed them, LEP recipients stood in long lines before they

knew which were the correct lines to stand in, and the mentally disabled were not given the time that they needed for special training or considerations.

- Not all retail personnel, even at large retailers, were adequately trained on EBT in general, and on assisting people with special needs, in particular.
- Advocates had anticipated that the Citicorp Helpline would be able to assist callers with most of their questions. During the first few weeks of roll-out, however, this was not the case. The Helpline could not answer many of the questions recipients had with regard to the availability of their benefits and referred them to the county welfare department. Because Alameda County did not have its own EBT assistance helpline (as Yolo County did), homebound recipients and those with limited travel ability (due to small children, work, or transportation difficulties) were especially vulnerable.
- With EBT, tracing missing funds now takes 15 business days, rather than the seven days it used to take with the old system. This represents a significant and unacceptable delay for any low-income person, but especially for those who, because of mental disabilities, more often find themselves in the situation of having to request a “tracer.”
- While it was the County’s written policy to replace EBT cards in the benefits offices, frontline workers (and managers) were not always clear about this policy and would tell recipients that their replacement cards would be mailed to them. This caused unnecessary delay and hardship for recipients.

Suggestions for Advocates

- Request that your county designate a key person on its EBT team to be responsible for serving people with special needs.
- Request that your county have an EBT helpline and a help desk at each site during at least the first two months of roll-out.
- Request that your county be equipped with machines to replace cards and PINs at each benefits office open to the public and that frontline staff offer recipients the opportunity to receive a same-day replacement card.
- Request that the State provide a plan for training retailers in your county about EBT transactions and special needs that some recipients may have.
- Ask your county to create a service plan for the first two weeks of roll-out for each benefits office. Yolo County offers a good example with an EBT helpline, a help desk, rotating lunch hours, etc.
- Ask your county to adopt Alameda County’s version of the *Request for Exemption from Cash EBT* form (Appendix M), which is more client-friendly than the State’s model. Make sure your county has translated copies of this form available before roll-out.
- Ask your county to mail an announcement to recipients about their right to request to “opt-out” of cash EBT or the cash stagger for hardship, well in advance of roll-out, and to provide this information at all recipient trainings.
- Ask the State to reconsider categorical exemptions for CalWORKs recipients with special needs or your county to consider categorical exemptions for GA populations with special needs (particularly the homeless).

LIMITED ENGLISH PROFICIENT (LEP) RECIPIENTS

Statewide

Citicorp is contracted to support EBT services in eleven languages: English, Spanish, Cantonese, Vietnamese, Cambodian, Russian, Hmong, Lao, Farsi, Mandarin, and Eastern Armenian. These languages were chosen because they are spoken by a significant percentage of the statewide caseload.

Written training materials provided by the State are in ten languages. (Only one version is necessary for the supported Chinese dialects.) The written materials are an EBT training pamphlet, a wallet card, and a poster for county offices. The training videos and audio tapes are in all eleven languages. For information about these materials, see pages 66-69.

Citicorp also offers a toll-free Customer Service Helpline; however, service for LEP recipients is limited. For more information about the Helpline, please see page 51, "Citicorp Helpline."

Advocates also have concerns about limited service to LEP merchants. This is particularly important due to the fact that many LEP recipients shop at ethnic grocery stores, many of which are owned and operated by people with limited English skills.

In Alameda County

Alameda County welfare department staff and advocates realized early that translation and interpretation services were key to a successful EBT transition. One of the first things that the County did was to run statistics on how many recipients there were in each language group in Alameda County. In most cases, the County translated printed materials and offered interpretation services in the five languages that each represent 5% or more of the county's caseload. The following are some of the areas in which the County provided translation and/or interpretation services:

- Notices sent to recipients each month during the five months prior to implementation;
- At all thirteen public forums held by the county in advance of conversion;
- All related forms and handouts;
- The walk-in trainings;
- The calls to recipients who appeared on the non-use reports showing that they had not accessed their benefits within the first ten days after conversion; and
- Outreach to LEP merchants.

The county welfare department also realized the importance of having certain forms or materials translated in as many languages as were represented in the total caseload. These forms and materials include:

- The Additional Cardholder form allowing others to have access to the recipient's benefits (Appendix O);
- The Request for Exemption from Cash EBT form (or "opt-out" form) allowing recipients to request to continue receiving cash assistance by means of a paper check (Appendix M);
- The EBT Card and PIN Responsibility Statement form (Appendix P); and
- The Exemption from Cash EBT Stagger form (Appendix N).

In addition to providing translation and interpretation services, the county welfare department staff helped to convene an LEP subcommittee that met twice monthly to address issues regarding LEP recipients and merchants. At the request of the subcommittee, the county welfare department committed to publish an LEP plan that detailed how LEP recipients would be transitioned to EBT. Particular concerns that the LEP subcommittee had regarding the transition to EBT included the following:

- ATM and POS machines usually only use English and Spanish to communicate with customers;
- Lack of training materials available for LEP recipients speaking languages other than the ten for which written material was printed by the State;
- Limitations of the Citicorp Helpline for LEP recipients;
- The need for the County to have interpreters available at all training sites and to be prepared to interpret incoming calls during the first months of implementation; and
- Despite the obvious need to evaluate how this population is affected by EBT, neither the State nor the County plans to evaluate the success of EBT specifically for LEP recipients. The quality of translation and interpretation services may continue to be an issue of concern resulting in confusion for a recipient population that may already be challenged by the new system.

Some of these concerns are highlighted in a Q&A handout developed during the Alameda County pilot to help educate the community about these issues. See Appendix Z for a copy of this LEP Q&A handout.

In addition to the concerns related to EBT specifically, the LEP subcommittee was concerned that some of the general problems that LEP recipients had with accessing benefits prior to EBT would only be exacerbated during and after EBT roll-out. For example, many of the County's recipients had their language incorrectly coded in the County's database, which meant that they would not receive information or follow-up phone calls in a language that they could understand. In some cases, this occurred because the county computers did not have codes for some languages even though many recipients in the county speak this language (e.g., Bosnian). Another example is that even when the county welfare department does have a person on staff who can interpret, they are often not well enough informed to answer specific questions that have a technical nature, as is the case with EBT, so recipients could get incorrect or incomplete answers when depending on county welfare department interpreters.

Because of the numerous concerns regarding the LEP recipient population, a group of advocates participating in the LEP subcommittee requested that the County exempt all LEP General Assistance (GA) recipients and give them the option to “opt-in” to the EBT system should they wish to participate in cash EBT. This request was made because it was learned that a large majority of GA recipients who were LEP were also either elderly or disabled or both. The GA program is a county administered program and, therefore, the Alameda County welfare department had the authority to agree to this request; however, the request was denied. (See page 34 for more information about the request made by advocates.)

Suggestions for Advocates

- Establish an LEP committee or subcommittee for the EBT transition.
- Request that your county develop a plan for EBT conversion specific to LEP recipients.
- Request that your county update and supply data regarding the number of LEP recipients (broken down by language) in your county.
- Ask your county what translation and interpretation services will be available to recipients during trainings and walk-in days and for all forms, mailings, and follow-up calls. This could be part of the county’s implementation plan.
- Ask the State to explain how they plan outreach to, and support for the needs of, ethnic grocers – especially those with limited English skills.
- Request that the State expand the Citicorp Helpline services for LEP recipients.
- Request that your county exempt from cash EBT all LEP General Assistance recipients who are either elderly or disabled from cash EBT – allowing them to “opt-in” should they choose to do so.

CASH ASSISTANCE PROGRAM FOR IMMIGRANTS (CAPI)

Statewide

The Cash Assistance Program for Immigrants (CAPI) is a state-funded program for immigrants who are not eligible for SSI or Social Security. It is administered by counties. CAPI recipients are low-income immigrants who are disabled or elderly and are not U.S. citizens.

Each county that administers the program will have the opportunity to choose whether or not CAPI payments will be delivered by the EBT system. It is important to note, however, that some counties do not administer CAPI for recipients in their own county. For example, San Mateo County administers CAPI for Alameda and other counties. As a result, the decision to use EBT for cash benefits in Alameda County may not apply to CAPI recipients in Alameda County, unless San Mateo County decides to use EBT for CAPI. All county decisions, forms, timelines and procedures that apply to EBT transition in San Mateo County will affect CAPI recipients in Alameda County. It is unclear how many other counties across the state are in a similar situation.

The State EBT Team is currently considering how to deal with this issue and could possibly request that CAPI recipients with a county administrator other than their county of residence should continue to receive cash warrants. However, due to the way CAPI is administered, it is also possible that even if a county is a food stamp-only county, CAPI recipients in that county may be converted to cash EBT.

In Alameda County

In Alameda County, CAPI recipients have not yet transitioned to EBT because the CAPI caseload for Alameda County is administered by San Mateo County. San Mateo County is not scheduled to roll out EBT until February 2003 and it is not certain whether they will be distributing CAPI benefits through the EBT system.

Advocates in Alameda County have been concerned about the CAPI population who tend to be limited English proficient (LEP) and are elderly or disabled. Because San Mateo County administers the program, advocates in Alameda County have had little success getting information about if and how EBT will be administered for CAPI. As a result, little is known about the kind of special consideration that may be needed to assist this population during and after EBT roll-out.

Suggestions for Advocates

- Find out early whether your county administers CAPI for recipients in your county. If your county does not administer the program, find out which county does and determine whether that county has chosen cash EBT for CAPI recipients and when it will roll out EBT.

- If your county is one that administers the program for other counties, find out which counties and consider contacting immigrant advocates in those other counties.
- Find out how many CAPI recipients reside in your county and what their primary languages are.
- Meet with immigrant advocates and the CAPI administrator (either in your county or in the administering county) to discuss whether CAPI will be included in cash EBT or not, and to propose special consideration and procedures, such as "opt-in" for the elderly and disabled, before roll-out.

CITICORP HELPLINE

Statewide

The toll-free Citicorp Helpline (1-877-328-9677) is printed on all training materials and on the back of all EBT cards. Recipients are encouraged to call to inquire about account balances or transactions or to request general information about their EBT accounts. Recipients are required to call the Helpline to report lost or stolen cards or PINs as soon as they learn that the card or PIN is missing or compromised. Any benefits that are lost or stolen using the PIN prior to the card being reported lost or stolen will not be replaced.

The main advocate concerns about the Helpline fall into four categories: (1) Usability of the Helpline, (2) Services for Limited English Proficient (LEP) recipients, (3) Personal Identification required by the Helpline, and (4) Service for Food Stamp-Only Counties.

I. **Usability of the Helpline:** One of the primary advocate concerns regarding EBT in California, and in other states where Citicorp is the contractor, is the usability of the Helpline. Specific areas of concern include:

- The fact that most services are provided by an Automated Response Unit (ARU), which can be difficult for many people to navigate.
- Some callers are on hold for several minutes before being served.
- Although the Helpline is accessible prior to a county's roll-out date, and recipients receive their cards in the month prior to the county's "go-live" date, recipients cannot access information about their accounts until their benefits are initially posted. During the pilot, not only could recipients not access account information, but when they tried to do so by entering their card numbers, the ARU responded, "Your case number cannot be located, goodbye." Recipients receiving their benefits on day two or day three of the cash stagger could not use the Helpline until that day – which caused problems for people who did not understand the cash stagger system and called to inquire about their benefits before they were posted. Recipients were led to believe that there was a problem with their EBT cards or accounts. The State is looking into reprogramming the ARU to give a "zero" balance when benefits are pending, but not yet posted. The possible message may be: "Your food stamp balance is zero" and/or "Your cash account balance is zero." Hopefully, this will help alleviate some of the confusion.

II. **Service for Limited English Proficient (LEP) Recipients:** Another advocate concern regarding the Helpline has been the ability of limited English speakers to successfully use the Helpline. On July 15, 2002, the State responded to advocate requests for information about the Citicorp Helpline with the following information regarding the languages and levels of service available to EBT recipients:

- "Eleven languages are supported by EBT: English, Spanish, Cantonese, Vietnamese, Cambodian, Russian, Hmong, Lao, Farsi, Mandarin, and Eastern Armenian.
- The Automated Response Unit (ARU), also known as the Client Helpline, provides automated responses for all the languages supported by EBT. Based on the experiences of other states, the ARU is designed to satisfy most client inquiries without the need to contact a Customer Service Representative (CSR).
- The Client Training Helpline, designed for clients who receive cards in the mail, provides information in all the languages supported by EBT.
- Clients can report lost or stolen cards to a CSR 24 hours a day, seven days per week in all languages supported by EBT. English and Spanish-speaking CSRs are provided by Citicorp. For all other languages supported by EBT, AT&T Language Line operators provide translation services for card deactivation.
- In addition to card deactivation, the Language Line is available between 7AM and 9PM, seven days per week, to provide all customer service functions to clients who speak Cantonese, Vietnamese, Cambodian, and Russian.
- Except for card deactivation, there are no Language Line services available for clients who speak Hmong, Lao, Farsi, Mandarin, and Eastern Armenian. The caller is asked to call back with an English-speaking interpreter."

According to the above State-provided information, the following services are available:

1. **English** and **Spanish** speaking recipients will be able to receive assistance from a CSR (actual person) 24 hours a day.
2. Recipients speaking **Cantonese, Vietnamese, Cambodian** and **Russian** can receive assistance 14 hours a day and card deactivation services 24 hours a day through the AT&T Language Line.
3. Recipients speaking **Hmong, Lao, Farsi, Mandarin** and **Eastern Armenian** will only receive assistance deactivating a card or PIN 24 hours a day using the AT&T Language Line. Assistance other than card deactivation will only be available through the use of the ARU.
4. **All other LEP recipients** not speaking the languages listed above cannot use the Helpline without assistance. The State has not provided instructions as to how recipients will complete the vital tasks associated with EBT card use for those who speak languages not serviced by the Citicorp Helpline.

State regulations (see MPP 16-515) require county welfare offices to refer all clients who contact them to report lost or stolen cards or PINs to the Citicorp Helpline. Considering the aforementioned limitations and the fact that all benefits lost or stolen prior to card deactivation will not be replaced, this is a process that could cause great hardship to many LEP recipients.

- III. Personal Identification Information Requested by Helpline:** For security purposes, in order for recipients to use the Citicorp Helpline for specific tasks, such as ordering a new EBT card or changing a PIN, they must enter or give a CSR their personal information. Citicorp uses the recipient's Social Security Number and birth date, provided to Citicorp by county welfare departments, to confirm the identity of the recipient. Several concerns regarding this process came up before and during conversion in the pilot county. They include:
- Recipients without Social Security Numbers are unable to use some of the Helpline services and are required to go into the county benefits office to order a new EBT card or to change a PIN.
 - Authorized Representatives (ARs) are required to use their own Social Security Numbers to order a new card or to change a PIN using the Helpline. This is problematic because most counties do not collect, and others refuse to collect, this information and it is therefore unavailable to Citicorp.
 - During the first months of roll-out, not all CSRs were requesting the appropriate personal identification information prior to assisting callers, putting recipients' benefits at risk. This issue has been addressed.
- IV. Food Stamp-Only Counties:** As a result of both pilot counties opting for cash EBT, no information has been collected about the unique challenges of rolling out food stamp-only EBT in the upcoming counties. Therefore, any issues regarding the Citicorp Helpline particular to food stamp-only counties have not been addressed in this Guide. However, some advocates are concerned that because the ARU was developed with the needs of recipients with both food stamps and cash assistance distributed through EBT in mind, the ARU may be confusing for recipients who are only receiving food stamp benefits. Special training may be needed for Helpline use for food stamp-only recipients.

In Alameda County

In Alameda County, the Citicorp Helpline became available one month prior to roll-out and the vast majority of recipients had their EBT cards prior to the scheduled roll-out date. However, during these last weeks before benefits became accessible, the Helpline was only available to take calls concerning "lost cards or PINs." The Helpline was not available to assist with any other questions concerning EBT accounts due to a "catch-22" in the Citicorp Helpline system. The problem experienced by Alameda County recipients who called the Helpline prior to August 1, was that their accounts were not activated until August benefits were placed into the account, which would not be until at least August 1. As a result, any recipient who called the Helpline prior to August 1, was told by the ARU that, "the account could not be found." This caused confusion for the recipients who called the Helpline prior to their benefit availability date.

By establishing its own helpline, Yolo County was able to serve recipients whose account information was not yet available on the Citicorp Helpline. Alameda County did not establish an additional helpline to assist recipients.

Although no county helpline was developed in Alameda County to assist during roll-out, the welfare department did establish a protocol to assist recipients with lost or stolen cards. Alameda County has decided to deactivate EBT cards in the welfare office when asked to do so by a recipient. This is especially important for LEP recipients who might have difficulty reporting lost or stolen cards on the Citicorp Helpline. This county service goes beyond the minimum State requirement that instructs county welfare departments to refer recipients to the Citicorp Helpline to report lost or stolen cards. (See MPP 16-515.1.)

Suggestions for Advocates

- Request that the State fully support all eleven languages on the Citicorp Helpline 24 hours per day with live customer service.
- Request that the State develop a plan for those LEP recipients who do not speak one of the eleven languages and who lose their cards or PINs.
- Request that your county develop a plan to help recipients when they call the county welfare department with questions about EBT.
- Ask your county to train staff on the types of questions that should be responded to by the county, and not simply referred to the Citicorp Helpline.
- Request that your county provide help to recipients who contact them about a lost or stolen card, beyond the minimum State requirement that they be directed to the Citicorp Helpline to deactivate the card.
- Work with recipients to try the Helpline system so you can see how it works and what areas may be challenging for recipients. Report these problem areas to your county and to the State EBT Project.

GROUP LIVING FACILITIES

Statewide

Group living facilities include housing for the elderly, drug and/or alcohol treatment rehabilitation centers, battered women's shelters, foster family settings, and nonprofit shelters for homeless persons. They are important to consider during EBT roll-out, because many of these locations currently use the food stamp benefits of residents to help cover the cost of meals.

For group living facilities that are FNS certified, the County Readiness Guide (May 15, 2002) describes the EBT process:

Food stamp benefits may be redeemed at group living facilities and homeless meal providers that are FNS authorized. These facilities can also be designated by the client to act as an AR. To support EBT usage in such facilities, CEFS will install a POS device to each FNS-authorized group living facility or homeless meal provider that meets the \$100 minimum monthly food stamp coupon redemption requirement.

At the group living facility, the client will use the EBT card at the POS to transfer the required amount of benefits to the facility. When the client leaves the group living facility, the facility will execute a transaction to return any portion of the monthly food stamp allotment to which the client is entitled, in accordance with federal and state regulations and the retailer agreement. One copy of the transaction receipt will be provided to the client and one will be retained by the facility to document the transfer. (p. 94)

Group living facilities that are *not* FNS certified will need to become FNS certified prior to EBT roll-out to ensure that they can continue to accept recipient food stamp benefits. In the alternative, the group living facility can be designated by the client to act as his or her Authorized Representative (AR) for food stamp benefits (see page 41). The group living facility must contact its county welfare department to become an AR.

In Alameda County

In both Alameda and Yolo Counties, outreach to group living facilities was a joint effort by the County and State EBT Teams. However, it was very difficult to make contact with the facilities. In addition, neither the County nor the State had a way to get a full list of group living facilities that were less formal and not FNS certified. The Alameda County Community Food Bank assisted Alameda County by providing a list of group living facilities that were members of the Food Bank.

Suggestions for Advocates

- Ask your county to consider the needs of group living facilities and their residents early in the transition process.

- Ask your county to inform group living facilities about the option to become FNS certified and/or to act as Authorized Representatives for those they serve.
- Assist your county in developing a list of group living facilities in your county, both certified and non-certified.
- Ask your county to hold EBT informational meetings for group living facilities.

FARMERS' MARKETS

Statewide

Currently, hundreds of farmers' markets throughout the state participate in the Food Stamp Program. At most markets, individual farmers receive food stamp paper coupons in exchange for farm fresh fruits and vegetables. In most cases, the farmers' market association has been authorized by the United States Department of Agriculture (USDA) to accept food stamp coupons and will exchange the coupons collected by the farmers for cash. With the new EBT system, which requires a point of sale (POS) machine to access food stamp benefits, this exchange becomes more complicated, and some farmers' markets and/or farmers may not feel it is worth the inconvenience.

Additionally, as EBT is implemented throughout the state, we may find that issues inherent to EBT will make it more difficult for mobile vendors, like those at farmers' markets or those who deliver food in large counties like Los Angeles, to participate in the Food Stamp Program.

In Alameda County

During the Alameda County EBT pilot, the State EBT Project had developed two models of food stamp redemption at farmers' markets. At the Berkeley Farmers' Market, shoppers can go to the market's information booth before they shop to swipe their cards on a wireless POS machine and receive wooden tokens in the amount that they expect to spend that day. After making purchases, a shopper can return any extra tokens for a credit to his or her EBT card. Farmers redeem the tokens for cash from the market manager. This "scrip" model works well for markets that are smaller, have staffed information booths, and are willing to undertake the administrative tasks of issuing and redeeming scrip.

The State is attempting to implement a second model of food stamp redemption using the new EBT card at an Alameda County farmers' market located in downtown Oakland. This market redeems a high volume of food stamps and does not have a staffed information booth. The State has been trying to work with individual farmers at this market to help them become FNS authorized to receive food stamps and to obtain an EBT POS device. For several reasons, this model has been much less successful, with only a handful of farmers signing up for the new system. Although the market has a high redemption rate, each individual farmer may not serve enough food stamp recipients to make it worth the trouble of signing up and then taking the extra time necessary to make an EBT sale rather than a cash sale. Additionally, most of the farmers are limited English (LEP) speakers and neither the State nor Citicorp (the State's contractor) appear to have the language ability to adequately assist them.

Due to the difficulty in implementing the EBT system at farmers' markets, none of Alameda County's farmers' markets were able to accept food stamp benefits the first two months of EBT implementation. Additionally, five farmers' markets decided not to

participate at all. For low-income families who depend on farmers' markets to fill the nutritional gaps left by the lack of fresh fruits and vegetables in urban stores and for the farmers who depend on their patronage, these problems posed by EBT are serious.

Suggestions for Advocates

- Invite farmers' markets representatives, including market managers and farmers, to participate in EBT meetings or committees in your county.
- Make sure that farmers' markets and mobile vendors in your county know that EBT is coming and understand what changes its arrival will mean for their businesses.
- Encourage farmers' markets and mobile vendors to begin working with the State well in advance of your county's EBT roll-out date.
- Ask your county to commit to providing access for EBT cardholders to farmers' markets, and to work with the markets to determine what they need to participate in EBT.
- Ask your county how it plans to notify food stamp recipients that their food stamps will still be accepted at certain farmers' markets once EBT begins.

PERSONAL SECURITY, PRIVACY, AND FRAUD

Statewide

EBT presents new concerns for recipients in the areas of personal security, privacy, and fraud. Recipients attending the statewide Client Advocate Forum have been bringing these concerns to the attention of State policy makers over the past two years.

Personal security issues surfaced by recipients include the following:

- In some cash access locations, recipients will have to spend additional time at ATMs while making more than one transaction in order to withdraw their entire benefit amount, if desired. If stolen, these benefits will not be replaced; and
- If a recipient wishes to give his or her card to a relative to buy groceries, all program benefits (e.g., CalWORKs and food stamps) will be on the one card. Not only is this a security issue for minor or elderly relatives, but all benefits lost or stolen, using the PIN, prior to reporting the card lost or stolen will not be replaced.

Some recipients are concerned that information about their shopping and spending habits will now be available to the State and the county welfare department. Information about what is purchased will not be available. However, reports will be generated by Citicorp that show when a recipient's card was used, where, and the dollar amount accessed. This information will also be available through the EBT system to specified county workers. Although this can be helpful to assist recipients when they have problems tracking their benefits, it also makes them more vulnerable to an invasion of privacy.

At the request of advocates and recipients on the statewide Client Advocate Forum, the State EBT Project developed a statement called, "Privacy for EBT Users" (revised 4/10/01). This statement (Appendix AA) was posted on the EBT Project website, but has since been removed. The questions and answers on the statement have now been incorporated throughout the Frequently Asked Questions section of the website (www.ebtproject.ca.gov). Advocates continue to ask the State for a written privacy statement and at this time it is unclear whether the State will produce and make public such a statement. To help address some recipient and advocate concerns, at least two county welfare departments have produced and plan to distribute their own privacy policies. See Appendices BB and CC for copies of these policies.

Advocates, in particular, have been concerned that the so-called "exception" reports, or "fraud" reports, generated by Citicorp will subject recipients to undue hardship and fraud investigations. "Fraud" reports that Citicorp is required to produce include the following:

- Excessive large dollar food stamp transactions;
- Multiple transactions in the same day;
- Excessive number of card replacements; and
- Transactions with common dollar amounts.

These reports can be helpful to detect fraud and to protect a recipient's benefits, however, advocates are concerned that county welfare departments will not have proper procedures in place to ensure that a recipient who is not committing fraud will not be unnecessarily investigated or harassed.

In Alameda County

Alameda County advocates are concerned that the existing policies and procedures protecting recipient privacy are not sufficient to protect recipients from misuse of the additional information now available through the EBT system. In Alameda County, workers have access to recipients' shopping habits, including where the EBT card is used, how much is spent, and when. As mentioned above, this can be helpful to assist recipients when they are having problems tracking their benefits, but it also makes them more vulnerable to an invasion of privacy. The County staff feel that the existing policies dictating the appropriate use of information are sufficient to address any issues related to the misuse of a recipient's EBT information. Advocates, however, would prefer that the policies be updated to include EBT-specific language and that recipients be informed about the County's privacy policy with regard to EBT.

Advocates are also concerned that the new processes and reports available for investigating fraud related to EBT use have not been sufficiently communicated to recipients. The County and State have both said that these types of specifics will not be available because they may give potential lawbreakers insight into how to avoid investigations. Advocates feel that some information regarding how fraud investigations are triggered using EBT data should be available to recipients.

At the request of advocates, the county welfare department held a public forum to discuss the issues of personal security, privacy, and fraud. The forum drew more than 400 participants. However, the vast majority of recipients who attended were there to learn about EBT in general. Advocates working with clients who have been sanctioned or subjected to fraud investigations have been the most interested in learning about the County's fraud investigation policies and procedures with regard to EBT.

Suggestions for Advocates

- Ask your county to develop training materials related to personal safety and security issues and to distribute the (translated) materials to recipients.
- Ask your county to develop policies and procedures that protect recipients without subjecting them to unnecessary hardship and investigations.
- Ask and assist your county to develop an EBT privacy policy and/or statement.
- Contact CBOs in your county that assist recipients in responding to fraud charges related to food stamp or cash benefits. These groups will understand current fraud investigation procedures and can make suggestions about how EBT-related information should and should not be used by your county's welfare department and/or District Attorney's office in investigating fraud after EBT roll-out.

SECTION FIVE: Training and Outreach

EBT technology and accessing benefits through the existing commercial infrastructure is a new process for many recipients. Even for those recipients who are familiar with debit-card technology and/or have bank accounts, the EBT system's characteristics that are different from regular banking procedures will require adjustments. Recipients will need to be trained well in order to use the EBT system successfully.

- A. Community Forums** **Page 62**
Community forums can be used to educate the public about the EBT system and to solicit community feedback and concerns.
- B. Community-Based Organization (CBO) Trainings** **Page 64**
Community-based organizations are often on the front-lines in assisting recipients with benefits issues. CBOs will need training to address recipient concerns about EBT.
- C. Written Training Materials for Recipients** **Page 66**
Written training materials describing how to use the EBT system have been prepared for recipients in ten languages.
- D. Video and Audio Training Materials** **Page 68**
A training video showing how to use the EBT system has been prepared by the State's contractor and is available in eleven languages.
- E. Recipient Training for Mail-Based Conversion** **Page 70**
Recipients in counties choosing mail-based conversion will receive training materials in the mail and will have the option of visiting a walk-in training center and/or calling a Citicorp Training ARU.
- F. Recipient Training for Over-the-Counter Conversion** **Page 72**
Recipients in counties choosing over-the-counter conversion will be able to receive training in county benefits offices when they pick up their EBT cards and PINs.
- G. Ongoing Training and Information** **Page 74**
After conversion, the county welfare department is responsible for providing ongoing training and information to recipients. There are a number of things that each county can do to ensure that recipients continue to receive the information they need to successfully access their benefits through EBT.

COMMUNITY FORUMS

Statewide

Holding community forums is one way to educate the community about this dramatically different process of benefit delivery. It is also an excellent way for the county welfare department to solicit feedback from the community about EBT.

Community forums are also a way to gather community feedback on specific issues. County welfare departments are invited by the State EBT Project to seek input from the community to ensure a more successful roll-out process. The County Readiness Guide (May 15, 2002) prepared by the State to assist counties in their EBT transition (posted at www.ebtproject.ca.gov), states that counties, “may wish to solicit community input from organizations representing and serving clients, such as clients (*sic*), advocate groups, and community-based organizations,” in obtaining feedback for the cash access plan. (p. 57) It also states that the counties might rely on community input to better assist special needs recipients' transition to EBT. (p. 72)

In Alameda County

In Alameda County, the Board of Supervisors worked with the county welfare department to offer several community forums throughout the county. The main purpose of the forums was to present and discuss Alameda County's cash access plan and to solicit community input on the plan. All recipients were mailed a multilingual invitation to the forums one to two weeks prior to the forum dates. The turnout for the forums was very good, with the majority of the attendees being recipients. The County offered a presentation about EBT, showed the training video (both with interpretation services), and surveyed recipients about their pre-EBT cash access habits. With over 800 surveys collected, the County learned where many recipients cashed their checks, how many paid fees, and how much was paid in fees.

Although the community forums were not as successful at soliciting feedback for the cash access plan as intended, they were successful at educating the community, and recipients in particular, about EBT. They also helped to educate the county staff about the many questions and concerns that recipients had about EBT.

In addition to the twelve community forums held to review Alameda County's cash access plan, the County also held a community forum, at the urging of advocates, to discuss issues of personal security, privacy, and fraud with regard to EBT use and information. This meeting was held just one month prior to roll-out, with over 400 recipients in attendance. Again, this meeting was very successful in educating the community about EBT, but not so successful in providing a forum to discuss these particular issues. See page 59 for a discussion of personal security, privacy, and fraud.

Suggestions for Advocates

- Consider community forums as a way to introduce EBT, discuss EBT-related issues that are particularly important to your community, and solicit feedback and questions from the community about EBT.
- Provide interpretation and child care services at all community forums.
- Ask your county to provide EBT-related forms at the forums (e.g., forms for exemptions to cash EBT and the cash stagger, direct deposit forms, additional cardholder forms, etc.)
- Work with your county to develop a way to receive valuable input about the cash access plan (if yours is a cash EBT county), other than at a community forum, as this might not be the best way to discuss the plan. For many, the community forum will be their first exposure to EBT and more time may be necessary to go over the basics of EBT.

COMMUNITY-BASED ORGANIZATION (CBO) TRAININGS

Statewide

According to the State's County Readiness Guide (May 15, 2002), "CBOs are a vital resource in serving special needs populations such as the elderly, homeless, disabled and non English-speaking clients." As such, each county will be given the opportunity to offer trainings to CBOs conducted by the Quest Group, a subcontractor of Citicorp. These trainings are meant to prepare organizations to respond to client questions related to EBT. According to the Guide, "The training is provided as a means to improve the overall knowledge of EBT among those who serve the client population and to ease transition to EBT." (p. 72)

The Quest Group is responsible for conducting the trainings. Counties must determine how many trainings (within specified limits) there will be, which CBOs to invite, and how to invite them. Advocates can help counties to develop these plans and help to ensure greater attendance at the trainings. Counties can also choose to provide their own trainings in addition to, or in place of, the Quest Group trainings.

In Alameda County

The Alameda County welfare department scheduled two CBO trainings seven months prior to roll-out. Unfortunately, not many CBOs were represented during the trainings and the presentation made by the Quest Group was disappointing. Reasons that the trainings did not meet expectations include the following:

- The notice about the trainings, written by the county, were not specific enough to explain the importance of why a CBO representative should take the time to attend and a letter of invitation did not accompany the notices;
- Notice of the trainings was sent only one week prior to the trainings;
- The written training materials were not available to give to CBOs at the trainings; and
- The Quest Group presenter was not proficient at presenting to CBOs serving low-income clients.

These shortcomings aside, the Alameda County staff worked hard to involve advocates in this process that, in the long run, helped to build a relationship resulting in the education of many CBOs. Advocates presented at each of the CBO trainings, encouraging the attendees to learn more about EBT and to become involved in the transition process. The County and advocates later worked together to set up several presentations at pre-existing community meetings where CBOs would be present. The County and advocates also worked together to develop a process for CBOs to request presentations to their staffs and training materials for their clients. (See Appendices DD and EE for copies of the Speaker Request Form and Information Request Form developed by Alameda County staff and advocates.)

The State EBT Project was made aware of the shortcomings of the CBO trainings offered by the Quest Group and trainings have since been improved.

Suggestions for Advocates

- Make sure that your county plans to have a sufficient number of CBO trainings.
- If your county chooses to have the Quest Group make the presentation, make sure that county staff are present to answer county-specific questions.
- Ask your county to provide substantial notice to CBOs about the trainings and to be sure that the notice informs CBOs of the importance of attending a training.
- Ask your county to start offering trainings in advance of when recipient notices are sent out so that CBOs will have heard about EBT and be ready to answer recipients' questions, and then again closer to when recipients will receive their cards.
- Ask your county to make presentations at pre-existing meetings of CBOs who serve recipients.
- To help increase attendance at the trainings, ask your county to go beyond sending out written invitations. One idea is to make follow-up phone calls to at least a few key CBOs prior to the trainings.
- Ask your county to work with the community in determining the best way to get the word out about the trainings.

WRITTEN TRAINING MATERIALS FOR RECIPIENTS

Statewide

Under its contract with the State, Citicorp is responsible for training EBT cardholders during the conversion process. Part of this responsibility includes producing and printing the written training materials and updating these materials. Each county will make decisions regarding how and when the training materials will be provided to recipients as part of their "conversion" decision. It is each county's decision about how they will provide ongoing client training after the initial conversion to EBT.

The State and Citicorp have developed three written tools to train recipients in EBT card and system use: a training brochure, a wallet card, and an EBT poster. The written training materials are available in ten languages: English, Spanish, Russian, Lao, Cantonese/Mandarin (Chinese), Vietnamese, Cambodian, Hmong, Farsi, and Eastern Armenian.

Advocates were involved early in the development of the English version of the training materials and the State accepted many of the advocates' suggestions for improvement. The full set of translated materials was made available to advocates in August 2002, and various advocate groups throughout the state have worked to review the translated materials and provide feedback to the State. Comments regarding the translated materials that have been provided to the State include:

- Translations are very literal, thereby obscuring the meaning;
- Sometimes confusing terms are used or more than one term is used to refer to an essential concept, like "food stamps"; and
- Inaccurate terms are sometimes used (for example, the Hmong word for "sewing machine" was used to translate the word "machine," as in "POS machine").

The State is working to correct these problems; however, they will be unable to provide materials accounting for all regional variations.

Probably because both pilot counties implemented food stamp and cash EBT at the same time, the training materials addressing both types of aid together were the first materials completed by the State and Citicorp. The food stamp-only training materials were not completed until recently and are essentially an edited version of the combined food stamp and cash EBT materials. The edited food stamp-only materials were not reviewed by advocates or recipients.

In addition to the training materials, the State has also created a pamphlet entitled, *How to Get Your Cash Benefits at NO Cost!*, which gives recipients ideas about how to avoid transaction fees and surcharges (see Appendix I). At this point, the pamphlet is only available through the State in English. For now, decisions about translating the brochure and how to distribute it must be made by each county.

In Alameda County

Even though Alameda County was a pilot county, it received a full set of training materials (with all of the translations) only weeks prior to roll-out. There should not be a delay that affects many other counties now that the materials (and their translations) are complete, with the exception of some adjustments/corrections. Even when County staff did have the materials available, their plan for ensuring that the materials were distributed and posted was not very successful. Posters were not placed in some of the benefits offices, nor were they made readily available to CBOs that requested copies.

County staff and advocates worked together to create a process that would help CBOs order the training materials (both the written materials and the video). An order form (see Appendix EE) was created to assist the County in processing requests for materials. However, because the County did not receive the translated materials until later, and there was not a streamlined process for distributing the materials once received, this system did not work as effectively as the County and the advocates would have liked.

Suggestions for Advocates

- Request that the State translate the brochure entitled, *How to Get Your Cash Benefits at NO Cost!*, into the ten written training languages.
- Let the State know if recipients in your county are confused by any of the training materials. Propose revisions that would improve the materials and ask the State to incorporate these and other comments in the future.
- Ask your county to make sure that training materials are available long before roll-out.
- Ask your county to develop a system for distributing the printed materials and training videos and making them available to CBOs and all benefits offices well in advance of implementation.
- Encourage the State to adopt advocate and recipient feedback for the translated food stamp-only materials.
- Ask your county to develop and translate additional training materials, as needed.

VIDEO AND AUDIO TRAINING MATERIALS

Statewide

In addition to written training materials, the State and Citicorp developed a video entitled *How to Use EBT* and made it available in eleven languages. The languages are English, Spanish, Cantonese, Mandarin, Vietnamese, Cambodian, Russian, Hmong, Lao, Farsi, and Eastern Armenian. These languages were chosen because they are spoken by a significant percentage of the statewide caseload. Each county must decide in which of the available languages they would like to have the training video for their clients.

The State also developed an audio recording of each of the translated videos so that a recipient could watch the English video while listening (via headphone set) to a translated audio accompaniment to the video. This would prevent the recipient from having to wait until the video was played in his or her chosen language or the county from having to operate several video machines at the same time.

Advocate input was requested and considered by the State during the development of the English version of the training video. Advocates throughout the state continue to review translations of the video and minor changes are being requested, but it is not clear to what extent these suggestions will be adopted. For the most part, the video is very informative.

In Alameda County

The video and accompanying audio translations were used at all walk-in training centers in Alameda County. The audio translations seemed to work well as an alternative to the translated video. The one challenge was making sure that the "play" button of the headset was pushed in time to be synchronized with the video. During the walk-in trainings, county staff with appropriate language skills met with limited English proficient (LEP) recipients after the video to answer any questions they had. The 2,300-plus homeless and GA disabled recipients who were scheduled to receive their EBT cards and PINs in the county benefits offices also had the option to view the training video and ask questions.

In addition to showing the video during walk-in training, Alameda County's welfare department also arranged for the video to be shown several times on a local public access channel and used the video when giving presentations to CBOs.

In Yolo County

In Yolo County, where all recipients were scheduled for appointments to pick up their EBT cards and PINs, and participate in the trainings, if they desired ("over-the-counter" conversion), videos and audio translations were also used. In addition, the Yolo County benefits offices played the video in waiting rooms for several weeks prior to roll-out.

Suggestions for Advocates

- Request that your county provide copies of the training videos to CBOs (in appropriate languages) prior to roll-out to show to their clients.
- Request that your county show the video on local public access channels.
- Request that your county play the video in waiting rooms of benefits offices, with audio translations, prior to EBT roll-out.
- Request that the State continue to make improvements to the training materials, as needed.

RECIPIENT TRAINING FOR MAIL-BASED CONVERSION

Statewide

In counties choosing a mail-based conversion methodology, recipients will be mailed training materials (an EBT brochure and wallet card) along with their EBT cards. If a recipient would like additional training, he or she may view the training video, ask questions of trainers, and practice on a POS machine at a “walk-in training center.” Walk-in training centers will be staffed by the Quest Group (a Citicorp subcontractor) and will only be available for several days during a county’s initial conversion process. A recipient may also call a toll-free Citicorp Training ARU to receive additional training (1-866-328-4208).

In Alameda County

Alameda County chose mail-based conversion for the vast majority of its caseload. An exception was made for homeless recipients and some GA disabled recipients who were converted over-the-counter. Recipients converted by mail were sent their training materials along with their EBT cards. Recipients were also sent a notice of walk-in training sites, dates, and times twenty-two days before roll-out. Training dates and times were scheduled at each of Alameda County’s seven service locations, although some locations had more training dates and times available than others. The walk-in training sites were available beginning on a Saturday, twelve days prior to roll-out.

For the 2,389 Alameda County recipients who were scheduled for an over-the-counter conversion and training (see page 72), only 43.2% had attended their training by roll-out, leaving 1,356 recipients without their cards, PINs, or training materials. The majority of these “no-shows” were homeless recipients, thereby making follow-up more difficult. The walk-in training sites (for mail-based conversion recipients) were the same sites used for this smaller portion of recipients being converted by the over-the-counter method.

When recipients entered the walk-in training sites, they were asked if they were there for the EBT training and if they had received their cards and PINs in the mail. Interpretation was available for five language groups. Each person was also given a list of surcharge and surcharge-free ATMs in the county.

The walk-in training consisted of viewing a 25-minute video. Videos were available to view for both English and Spanish speakers and others were asked to watch the English version using audiotaped translations, which seemed to work well. The videos were shown every hour with a summation and answers to questions delivered by Quest Group employees after the video.

If a recipient did not have his or her card and/or PIN, he or she was able to get one that same day at that very office and asked to sign an “EBT Rights and Responsibility Form.” However, this form and the application for direct deposit were the only EBT-

related forms available at the trainings. Advocates in Alameda County considered this to be a big oversight, as this was a lost opportunity to inform people about cash exemptions, staggers, cash stagger exemptions, Authorized Representatives, etc.

While it is a primary responsibility of Citicorp/Quest Group to provide the training at the walk-in training centers, county welfare department staff outnumbered Citicorp/Quest Group staff by far. The presence of county staff was essential to improved training and training coordination. Other counties should be aware that they may need to provide additional staff beyond what they may have originally anticipated.

Citicorp's toll-free Training ARU was not well-publicized in Alameda County and very few of the recipients served by advocates knew that the number existed.

Suggestions for Advocates

- Keep requesting that the State send out bilingual training materials with cards, in both the language of choice and English, so that recipients may more easily ask others for help when needed.
- Request that walk-in training be offered at each county benefits office where recipients currently go for services.
- Request that card embossing and PIN selection be done the same day and location as training sites; this way, recipients will not have to travel to other sites, where their original cards may be.
- Request that training materials in all languages be available and posters posted at all benefits offices at least beginning the month before roll-out, if not sooner.
- Request that all EBT-related forms (and their translated versions) be available at each training site.
- Request that trainings start on a Saturday, as was done in Alameda County. This is a slower first day and gives staff more time to learn to use the audio equipment, card embosser, and PIN selection machine before they become very busy.
- Request that your county have translators available for questions and explanations, as they were in Alameda County.
- Request that the county develop and offer a list of surcharge-free cash access locations to clients during the walk-in trainings (in cash EBT counties).
- Request that a notice be posted at all PIN selection machines asking workers to remind clients about the importance of selecting a PIN that can be easily remembered, but that cannot be easily guessed by another.
- Request that county staff be on hand at the trainings to provide county-specific information and additional assistance beyond the Citicorp/Quest Group trainers.
- Work with your county to develop a plan for following-up with recipients whose names appear on the 10- and 30-day non-use reports.
- Request that Citicorp's toll-free Training ARU be included on all county notices about EBT and that county staff look for additional ways to publicize this service.

RECIPIENT TRAINING FOR OVER-THE-COUNTER CONVERSION

Statewide

In counties choosing an over-the-counter conversion methodology, recipients will be mailed appointment notices stating when and which county office to go to for their EBT cards and to select their PINs. Recipients also have the option to stay and watch the training video, ask questions of a trainer, and practice on a POS machine.

The State EBT Project's County Readiness Guide (May 15, 2002) outlines the process for counties that choose the over-the-counter conversion option. Citicorp (through the Quest Group) will issue EBT cards and PINs and will offer in-person training at county-designated locations. As the Guide explains, Citicorp will:

- Mail a training package to each designated cardholder with a prescheduled appointment to report to a designated card issuance location to receive their EBT card, select a PIN and receive training. Recipients will be able to reschedule the appointment time and date if they need to do so.
- Show the *How to Use EBT* video, discuss EBT, and instruct clients on the use of their cards.
- Hand each recipient his or her embossed card at the end of the training and assist him or her to select a PIN.
- For clients who may need further assistance, Citicorp will provide POS terminals and ATM-like posters to guide the client on the use of the card. Each training session will last approximately one hour. (p. 64)

According to the Guide, Citicorp will be responsible for developing a schedule for training, card issuance and PIN selection that is designed to control client flow and track attendance. Each recipient will be required to show appropriate identification. The county will receive a report of clients that did not attend their scheduled appointments. It will then be the county's responsibility to follow up with these individuals. (p. 64)

For counties that choose mail-based conversion (see page 70), hands-on training will not be given to all recipients as training materials, cards and PINs will be sent by mail. However, those counties may choose some subcategories of recipients as exceptions to mail-based card and PIN issuance and may provide them with over-the-counter conversion and training. An obvious example of a recipient population that might be excepted from mail-based conversion is homeless recipients, because they might not have mailing addresses. Counties may also offer exceptions to recipient populations that they feel need more training than that offered by the written materials.

In Yolo County

Yolo County chose an over-the-counter conversion and training for all 3,000-plus of its caseload. By two weeks prior to roll-out, approximately 70% of Yolo's recipients had

completed their training and had their cards and PINs. Additional efforts were made by County staff to ensure that the majority of those recipients who had not yet received their training and cards had done so by roll-out.

While the Yolo County initial show-rate (approximately 70%) appears to be much higher than Alameda County's (43.2%), it should be noted that Alameda County chose over-the-counter conversion and training only for its most difficult to reach recipient populations. Most of Alameda County's recipients, over 30,000 cases, received their cards, PINs and printed training materials through the mail.

Alameda County welfare department staff and advocates alike agreed that mail-based conversion and training worked best for their county. Yolo County welfare department staff were pleased with their decision to use over-the-counter conversion and training.

Suggestions for Advocates

- Request that your county have translators available for questions and explanations at conversion/training sites, as they were in the pilot counties.
- Request that training materials in all languages be available and posters posted at all benefits offices beginning at least the month before roll-out, if not sooner.
- Request that all EBT-related forms (and their translated versions) be available at each conversion/training site.
- Request that conversion appointments start on a Saturday, as it is a slower first day giving staff more time to learn to use the audio equipment, card embosser, and PIN selection machine before they become very busy.
- Request that the county develop and offer a list of surcharge-free cash access locations to clients during the conversion/trainings (in cash EBT counties).
- Request that a notice to workers be posted at all PIN selection machines asking them to remind clients about the importance of selecting a PIN that can be easily remembered but that cannot be easily guessed by another.
- Work with your county to develop a plan for following-up with recipients who appear on the 10- and 30-day non-use reports.
- Be sure to have county staff on hand to provide county-specific information and additional assistance beyond the Citicorp/Quest Group trainers.

ONGOING TRAINING AND INFORMATION

Statewide

After EBT conversion, the county welfare department is responsible for providing ongoing training and information to new and existing clients. There are a number of things that each county must do to ensure that recipients learn how to successfully use the EBT system and continue to receive the information they need about other EBT-related issues. After conversion, some of the things each county must decide are how it will do the following:

- Train new recipients in the use of EBT;
- Inform applicants/clients of their rights and responsibilities under EBT;
- Continue and staff on-site training functions after conversion activities;
- Provide updated lists of cash access locations to recipients;
- Ensure that each recipient has the opportunity to apply for an exemption for hardship from cash EBT or the cash stagger; and
- Ensure that recipients can easily designate and remove Authorized Representatives (ARs) or Designated Alternate Cardholders (DACs) from their cases.

Providing this information to clients can require many tasks and tools, including mass and individual mailings, posters, videotapes, and face-to-face discussions. The county will need to develop procedures to carry out these tasks after the initial EBT conversion.

In Alameda County

The Alameda County welfare department developed several procedures to provide ongoing training and information to recipients. These include:

- **List of ATM Locations:** Creating lists of all surcharge and surcharge-free ATM locations by zip code. These lists are divided into North County, Central County, and South County, as the county is relatively large. The lists will be updated on a quarterly basis and distributed through the mail and at the benefits centers.
- **Educating About Farmers' Markets:** Working with U.C. Cooperative Extension and other CBOs to design a brochure and poster highlighting the fact that farmers' markets will still be able to accept food stamp benefits through the new EBT system. The brochure lists the markets that will accept EBT (not all markets will). These materials were mailed to recipients and are available in benefits centers throughout the county.
- **County Forms:** Working with the Alameda County EBT Advisory Committee to develop several forms informing recipients of their rights and responsibilities with regard to EBT. These forms include the Additional Cardholder request form, the Request for Exemption From Cash EBT form, the Exemption from Cash EBT Stagger form, and the EBT Card and PIN Responsibility Statement. Forms are

included as Appendices M, N, O, and P. Copies of the State's forms are included as Appendices Q, R, S, T, and U.

- **Notices of Action:** Creating new notices of action with EBT relevant information including non-use of benefits.
- **Ongoing Training for Recipients:** The county has chosen to provide ongoing walk-in training and on-site card issuance at a number of its benefits offices.

Although the Alameda County welfare department has successfully developed helpful forms and procedures to assist recipients in using their benefits after conversion, there are still a number of training and informational procedures that have yet to be implemented. In particular, advocates in the county are concerned that frontline staff have not had enough training on the EBT forms and procedures described above. This has resulted in recipients being denied information, forms, or assistance that should be readily available.

Food Stamp-Only Counties

The State has created a number of forms (in addition to several Notices of Action) to assist counties with EBT issues. Alameda County has also created its own forms that can be used as models for other cash EBT counties. However, both State and County-developed forms, which were created with the needs of cash EBT counties in mind, can only serve as starting points for forms necessary to serve EBT food stamp-only recipients. Both State and County-developed forms are included as appendices.

Suggestions for Advocates

- Ask your county to work with CBOs and advocates to develop county- and EBT-specific forms that will be used during and after conversion to educate recipients about their rights and responsibilities under EBT.
- Ask your county to produce and distribute updated lists of surcharge and surcharge-free ATM locations by zip code on a quarterly basis.
- Ask your county to continue walk-in training and same-day card issuance at all of its benefits offices during all hours of operation.
- Remind the county that staff training is key to providing information to recipients and ask them to design a plan to ensure ongoing staff training.
- Ask your county to train staff on the types of questions that must be responded to by the county, and cannot simply be referred to the Citicorp Helpline.
- Ask your county to develop a privacy policy specific to EBT information.

SECTION SIX: EBT Pilot Evaluation

Statewide

With the pilot counties having completed their conversion processes, the State is in the final stages of pilot evaluation. The State has been working with county staff in both pilot counties to evaluate Citicorp "deliverables" and the overall EBT system throughout the conversion process. In addition, the State has involved advocates in reviewing training materials, the cash access plan, and other aspects of EBT.

In the final stages of pilot evaluation, the State has contracted with San Francisco State University to interview county staff, recipients, merchants, and CBOs in the pilot counties about the newly implemented EBT system. The State expects that this report will be finalized and available to interested parties in November 2002.

To help with ongoing evaluation of the EBT system, the State is interested in hearing from advocates about problems related to EBT, but is particularly interested in the following problems:

Client Services

- If recipients are charged a surcharge in excess of what is posted on or near the ATM or POS machine when they withdraw their cash benefits, or the fee is not posted, ask the recipient to note the date and location of the transaction.
- If a recipient is charged a fee for a food stamp transaction, ask the recipient to note the date and location of the transaction. There should **never** be a fee for a food stamp-only transaction.

Merchant Services

- If a retailer would like to participate in EBT, but does not know how; or
- If a retailer would like to participate in EBT, but needs translation services, ask the retailer to contact the State.

Concerns can be reported to the State's EBT Customer Service number at (916) 263-6600 or emailed through the State's EBT Project website at www.ebtproject.ca.gov.

In Alameda County

In addition to putting significant resources toward assisting the State in its evaluation of EBT, Alameda County welfare department staff are also reviewing reports to assess how they have done and to determine whether there are any recipients who still need assistance in order to successfully use EBT. County staff are reviewing all forms and county procedures to integrate lessons learned during the first few months of implementation. The State and Citicorp provide some of the reports that the County is using to evaluate EBT conversion and the system in general. These reports include:

- Non-Use Reports,
- Retailer Reports,

- Surcharge and Transaction Fee Reports, and
- Over-the-Counter "No-Show" Reports.

For the most part, Alameda County should be proud of its EBT roll-out with only two percent of recipient households appearing on the non-use report after the first month and the vast majority of FNS certified retailers signed up for EBT. In addition, a survey of recipients conducted by the Alameda County Community Food Bank during the first month of roll-out indicated relative satisfaction with the new system. See Appendix FF for a copy of the survey questions.

Suggestions for Advocates

- Obtain a copy of the State's evaluation of the EBT pilot counties after it is completed in November 2002.
- Ask the State to evaluate and provide specific information related to the EBT system's ability to serve special needs populations.
- Encourage your county to begin developing its own goals for evaluation in your county and determine what statistics (pre-EBT roll-out and post-EBT roll-out) you will need from your county to evaluate the new system. These might include the number of people requesting exemptions from cash EBT for hardship, the number of people requesting direct deposit, the language breakdown of those who did not use their cards in the first month of roll-out, how many of the people who did not pick up their EBT cards were homeless, etc.

SECTION SEVEN: Conclusion

When advocates in California began meeting to discuss the transition to EBT, we were told by State officials that this was a system already operating smoothly in nearly 40 states and that many of our concerns that recipients might be negatively impacted by the transition were unwarranted. Yet as we sought answers to our questions concerning conversion in other states and how recipients were faring under the new system, the extreme lack of information about many key topics related to implementation was unsettling. Advocates were put in the uncomfortable position of having to rely upon the information and assurances of State officials and Citicorp or, even more frequently, moving forward without any information at all. Although advocates were involved with EBT in some other states, little or no information was available to assist advocates in states like California that had yet to transition to EBT.

This Guide was written to ensure that as EBT rolls out throughout California, the experiences of recipients and advocates in Alameda County, one of the state's two EBT pilot counties, are documented and can contribute to a successful transition process in other counties.

Converting to EBT in a relatively large and diverse county like Alameda is a massive undertaking, perhaps even greater than advocates or the county welfare department had anticipated. Therefore, there is a great deal of information that this Guide does not cover. However, we believe that the basic information provided in this Guide will offer advocates and recipients an excellent starting point to become involved in the EBT transition in their respective counties.

In addition to providing advocates, CBOs, and recipients with information about the EBT transition process, we hope that the Guide has also demonstrated the importance of advocate and community involvement in order to make EBT a system that works well for all recipients. Whether you have many or only a few hours to dedicate to a successful EBT transition in your county, your involvement will positively impact how this new system will be delivered to the low-income people who rely on cash aid and/or food stamp benefits in your county. You will find that your participation in EBT roll-out will not only benefit recipients, but will also help you to learn more about your county's benefit delivery system and to build relationships with county officials that can serve you and your low-income clients now and in the future.

GLOSSARY

Account Balance refers to the amount a recipient has in his or her EBT account(s). Account balances should be provided on EBT transaction receipts. Balances can also be accessed for free through the Citicorp Helpline, and cash EBT balances can be accessed for a \$ 0.25 transaction fee at participating ATMs. EBT cardholders will not receive a monthly statement.

Additional Cardholders are permitted for other adult household members and for persons outside the household who are designated by the recipient to receive their own EBT cards and PINs. The additional cardholder will have complete access to the recipient's specified benefit type. Designated cardholders outside of the household are called Authorized Representatives (for food stamp benefits) and Designated Alternate Cardholders (for cash benefits).

Advisory Committee is a group consisting of advocates, county officials, and recipients that some counties have developed as a way to ensure community input and a successful transition to EBT. The Alameda County Board of Supervisors has applauded the use of advisory committees for successful EBT transition.

Authorized Representative (AR) is a person that is given full access to a recipient's EBT food stamp account with the authorization of the recipient. The AR will receive his or her own EBT card and PIN. The State recommends use of an AR if a person is homebound or is unable to use the EBT system.

Automated Response Unit (ARU) is an automated phone system that recipients with touch-tone phones can use to access information about their EBT accounts. The responses to recipients' inquiries will be given by a recorded voice. The ARU is used in conjunction with live Customer Service Representatives. A toll-free Training ARU (1-866-328-4208) is also available for recipients in counties choosing mail-based conversion.

Automated Teller Machine (ATM) is a cash machine found at banks, stores, and many other places that allows a recipient to access cash benefits and check the balance of his or her EBT cash account.

Case Number is the number assigned by a county welfare department to an individual or family receiving benefits. This number determines which day of the month an individual's or family's food stamp and/or cash benefits will become available.

Cash (Benefits) Stagger refers to the three-calendar-day period at the beginning of each month in which recipients' cash benefits will become available with EBT cards, in counties that are participating in cash EBT. The first day of availability of a recipient's benefits will be based on the last digit of his or her case number.

CBO is the acronym for community-based organization. The CBOs referred to in this Guide are primarily those that serve low-income clients.

Citicorp Electronic Financial Services, Inc. (aka Citicorp or CEFS) is the commercial institution that the State has contracted with to provide EBT services in California. It was the only company to bid on the California project and is currently providing EBT services in over 30 other states. Citicorp subcontracts with several other companies to provide many EBT-related services.

Citicorp Helpline is a toll-free customer service number available for use by recipients to ask questions about their EBT accounts. The majority of calls to the Helpline will be answered by an ARU. The toll-free number is 1-877-328-9677.

Conversion is the term that describes the initial process of transitioning recipients from paper food stamp coupons and checks (in cash EBT counties) to the EBT system. The two types of conversion in EBT are "mail-based" and "over-the-counter."

County Readiness Guide is a document prepared by the State EBT Project to assist counties in the EBT implementation process. Valuable information can be found in this document for advocates, as well. The Guide can be found at the State's EBT Project website at www.ebtproject.ca.gov.

County Welfare Department (CWD) is the primary county entity that will implement EBT in a given county. Official names of CWDs vary by county (e.g., Alameda County Social Services Agency, Los Angeles County Department of Public Social Services, Solano County Health & Social Services, Yolo County Department of Employment & Social Services, etc.).

Customer Service Representatives (CSRs) staff the Citicorp Helpline for some of the "supported" languages.

Designated Alternate Cardholder (DAC) is a person chosen by a recipient to receive an EBT card and PIN to access the recipient's cash benefits.

Direct Deposit of a recipient's cash benefits into his or her personal bank account is a recipient option available in most counties. Cash aid recipients in most counties may choose this as an alternative to receiving their cash benefits through the EBT system.

Eligibility Systems are the computer systems used by counties to determine eligibility for cash assistance and Food Stamp programs. Examples of eligibility systems are LEADER, C-IV, ISAWS, and WCDS.

Ethnic Retailers are retailers that serve ethnic communities and are most often owned and operated by limited English proficient (LEP) speakers. These retailers may need additional outreach and assistance in transitioning to the EBT system.

Exemption is an option available in cash EBT counties allowing a person to request not to use EBT for cash benefits due to hardship. An exemption for hardship can also be requested from the cash stagger so that a recipient may receive all of his or her cash benefits on the first day of the month, instead of the second or third day of the month. Another term used for an exemption to cash EBT (not the cash stagger) is "opt-out."

Food and Nutrition Service (FNS) is the branch of the United States Department of Agriculture (USDA) that administers the Food Stamp Program and certifies retailers to participate in the program. Only FNS certified retailers are authorized to accept and redeem food stamp benefits.

Food Stamp Program is a federal nutrition assistance program that provides households with incomes equal to or less than 130% of the poverty level (based on the federal poverty guidelines) with assistance to purchase food. The USDA administers the program.

Food Stamp (Benefits) Stagger refers to the 10-calendar-day period at the beginning of each month in which a recipient's food stamp benefits will become available through the EBT card. The first day of availability of a recipient's benefits will be based on the last digit of his or her case number.

Golden State Advantage Card is the official name of California's EBT card.

"Go-Live" Date was the term used to refer to the first day of the month that benefits would be available through EBT in a given county. This led to confusion for some retailers in the pilot counties who were not EBT-ready in the month before conversion when new applicants (and some others) were receiving EBT cards to access benefits. Now see "'Soft Go-Live' Date."

Invitation to Partner (ITP) refers to the document used by the State EBT Project to solicit bids from private contractors to implement and run the EBT system in California. Valuable information is contained in this document about the details of the EBT system. Part of the ITP can be found on the State EBT Project's website at www.ebtproject.ca.gov.

"Kid Card" or "Kiddie Card" refers to a secondary EBT card that can be used by a recipient to give to a child (or other person) to access a limited amount of benefits. No state, including California, has yet adopted this concept.

Language Line refers to the AT&T Language Line service that Citicorp will use on its Helpline to assist some LEP recipients.

Limited English Proficient (LEP) refers to people with limited English skills. Many issues involving EBT implementation and usage require special consideration for LEP recipients and merchants.

Mail-Based Conversion refers to the process of distributing EBT cards, PINs, and training materials to recipients through the mail, rather than in the benefits office, as is done in "over-the-counter" conversion. Each county must choose which conversion method it will use to transition its caseload to the EBT system.

Manual Transaction refers to a food stamp EBT transaction using a paper (manual) voucher. There are no manual transactions for cash EBT.

Mobile Vendors are usually small non-FNS certified retailers who sell groceries in various neighborhoods.

MPP stands for the Manual of Policies and Procedures of the California Department of Social Services. The MPP contains the state regulations governing EBT.

Non-Use Reports are reports provided by Citicorp to the State and counties to identify which recipients have not used their new EBT cards within the first 10 days and then again within the first 30 days after conversion. This list helps the county to follow up with these recipients and might help identify recipient populations not being served well by the new system.

Ongoing Issuance refers to the procedures that will be used after EBT conversion to issue new and replacement EBT cards, provide training, and offer ongoing support for recipients using the EBT system.

"Opt-in" and "Opt-out" are terms coined by advocates to refer to the choice of a cash aid recipient to receive his or her benefits through the EBT system or not. Advocates asked that the choice be given to some recipients to "opt-in" to the cash EBT system, rather than be automatically moved to the EBT system. The request was denied. Instead, recipients can request to "opt-out" of the system for their cash benefits if they can show hardship. To do so, a recipient must request an "exemption" from the county welfare department.

Over-the-Counter Conversion refers to the process of distributing EBT cards and PINs to recipients by requiring them to come into a benefits office, rather than receiving the cards and PINs through the mail, as is done in "mail-based" conversion. Each county must choose which conversion method it will use to transition its caseload to the EBT system.

Pilot Counties for California are Alameda County and Yolo County. These counties were used to "pilot" or "test" the EBT system for California. Recipients in the pilot counties began using EBT in the summer of 2002.

PIN (Personal Identification Number) is a four-number secret code that a recipient must use with his or her EBT card to access benefits. The PIN is not required for manual voucher transactions. A recipient may call the Citicorp Helpline to change his or her PIN, but must give his or her Social Security Number and date of birth to do so.

POS (Point-of-Sale) Machine is a device that reads EBT cards and allows recipients to buy food with food stamp benefits or make purchases with cash benefits. Some stores may also allow recipients to get cash at a POS machine with or without a purchase.

Primary Account Number (PAN) is an individualized number that will appear on each EBT card, in addition to a recipient's case number.

Protective Payee is a person who acts on behalf of a recipient and receives the recipient's cash aid payment.

Quest Group is the name of the company that has been subcontracted by Citicorp to provide some EBT conversion-related services. In particular, this company is responsible for providing EBT training to recipients and county staff. This is entirely separate from the Quest Mark.

Quest Mark refers to the sign recipients should see on store doors/windows, check-out lanes, POS machines, and ATMs to indicate that EBT cards can be used at that store or machine. There are special pictures on the Quest sign that tell recipients which benefits can be used at that location: food stamps only, cash benefits only, or both.

Replacement Cards are available to recipients who lose or have their cards stolen. There is no cost to the recipient for the replacement card, however, any benefits lost or stolen from the recipient's account, using the PIN, prior to the recipient reporting the card lost or stolen to the Citicorp Helpline, will not be replaced. Damaged cards will also be replaced at no cost to the recipient.

Roll-Out is a term used to describe when a given county is transitioning to EBT.

"Soft Go-Live" Date refers to a day in the month before a county's conversion to EBT when it will start to issue EBT cards to certain recipients, such as new applicants.

Stagger see "Cash (Benefits) Stagger" or "Food Stamp (Benefits) Stagger."

"State" is used throughout this Guide to refer to the California EBT Project and/or the California Department of Social Services (CDSS) and/or the Health and Human Services Data Center (HHSDC). The California EBT Project consists of staff from both CDSS and HHSDC.

Surcharge is a fee that recipients will pay at some ATM and POS machines. Each bank or store has the option of whether to provide EBT recipients with free cash withdrawal service or to charge a surcharge for this service. The average ATM surcharge is \$1.50. Retailers are not supposed to charge a surcharge greater than what they charge regular debit cardholders for using their POS machines. A surcharge for using food stamp benefits is never allowed.

Third Party Processor (TPP) is a company that some stores will contract with to process their POS transactions and settle their EBT accounts.

Transaction Fee is an \$0.85 fee that recipients will pay to Citicorp when using an ATM to access cash, if they make more than four cash-only withdrawals from ATMs or POS machines within the month. This fee will be in addition to any surcharge.

Walk-In Training Centers are training locations in counties choosing mail-based conversion. For a short period during the conversion process, each mail-based county will offer "hands-on" training at walk-in training sites to recipients who desire such training.

LIST OF WEBSITES AND CONTACTS

Websites

| | |
|---------------------------------------|---|
| Alameda County Community Food Bank | http://www.accfb.org |
| Alameda County Social Services Agency | http://calworksdigest.com |
| California Food Policy Advocates | http://www.cfpa.net |
| California State EBT Project | http://www.ebtproject.ca.gov |
| Consumers Union | http://www.consumersunion.org |
| Food and Nutrition Service | http://www.fns.usda.gov/fsp |
| Legal Services of Northern California | http://www.lsn.net |
| National Consumer Law Center | http://www.nclc.org |

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- Appendix A *County Implementation Schedule (Updated 8-8-2002)*, California Electronic Benefit Transfer Project; retrieved October 14, 2002.
http://www.ebtproject.ca.gov/County_implement_sched.htm
- Appendix B *Final EBT Cash Decision Response Summary*, California Electronic Benefit Transfer Project; retrieved October 14, 2002.
http://www.ebtproject.ca.gov/County_cash_decisions.htm
- Appendix C *County EBT Decisions*, Health and Human Services Data Center (HHSDC), Electronic Benefit Transfer (EBT) Project, County Readiness Guide, May 15, 2002, p. 54; retrieved October 14, 2002.
<http://www.ebtproject.ca.gov/Library/CountyReadinessGuide.pdf>
- Appendix D *Alameda County EBT Advisory Committee Charter*.
- Appendix E Letter from Alameda County Supervisor Alice Lai-Bitker to the California EBT Project Director supporting the Advisory Committee Process, dated October 1, 2002.
- Appendix F *Electronic Benefit Transfer (EBT) is coming*, Alameda County Social Services publication; first EBT notice to recipients, February 2002
- Appendix G *Los Angeles County Electronic Benefit Transfer (EBT) Advisory Committee Charter (Draft)*, October 21, 2002.
- Appendix H *Solano County EBT Advisory Committee Charter*, May 15, 2002.
- Appendix I *How to Get Your Cash Benefits at NO Cost!*, State EBT Project publication (draft), October 21, 2002.
- Appendix J *Cash Access Report*, Alameda County Zip Code 94606.
- Appendix K *Cash Access Survey*, Alameda County Social Services Agency.
- Appendix L Letter from California EBT Project Director Christine Dunham to Authorized Food Stamp Retailers reiterating Food Stamp coupon acceptance policy, dated October 4, 2002.
- Appendix M *Request for Exemption From Cash EBT*, Alameda County Social Services Agency, Form # 50-124, New (07/02).
- Appendix N *Exemption from Cash EBT Stagger*, Alameda County Social Services Agency, Form # 50-125, New (07/02).

- Appendix O *Additional Cardholder, Alameda County Social Services Agency, Form # 50-122, New (07/02).*
- Appendix P *EBT Card and PIN Responsibility Statement, Alameda County Social Services Agency, Form # 50-123, New (07/02).*
- Appendix Q *Request for Cash Aid Electronic Benefit Transfer - EBT Exemption, California Department of Social Services, Health and Human Services Agency, Temp 2203 (7/02) Required Form-Substitute Permitted.*
- Appendix R *Cash Aid/Food Stamp Electronic Benefit Transfer - EBT, Request for a Designated Alternate Card Holder/Authorized Representative, California Department of Social Services, Health and Human Services Agency, Temp 2201 (7/02) Required Form-Substitute Permitted.*
- Appendix S *Cash Aid/Food Stamp Electronic Benefit Transfer - EBT, Service Request, California Department of Social Services, Health and Human Services Agency, Temp 2202 (7/02) Required Form-Substitute Permitted.*
- Appendix T *Electronic Benefit Transfer-EBT, Client Claim, California Department of Social Services, Health and Human Services Agency, Temp 2205 (7/02) Required Form-Substitute Permitted.*
- Appendix U *Electronic Benefit Transfer (EBT), Important Information, California Department of Social Services, Health and Human Services Agency, Temp 2215 (7/02) Required Form-Substitute Permitted-EBT Responsibility Statement.*
- Appendix V Notice of cash stagger sent to recipients, Alameda County Social Services Agency publication, April 2002.
- Appendix W Letter from California EBT Project Director Christine Dunham to all County Welfare Directors outlining the uniform benefit stagger methodology, dated November 9, 2001.
- Appendix X *Benefit Issuance Schedule, California EBT Project, CA-BIS 08/02.*
- Appendix Y *All County Information Notice No. I-35-02; Subject: EBT Policy Issues, California Department of Social Services, May 10, 2002.*
- Appendix Z *Electronic Benefit Transfer (EBT) & Limited English Proficient Clients, Q&A in Alameda County, July 16, 2002.*

- Appendix AA *Privacy for EBT Users, Health and Human Services Data Center (HHSDC), Electronic Benefit Transfer (EBT) Project, Revised 4/10/01; this statement has been removed from the California EBT Project website.*
- Appendix BB *Electronic Benefit Transfer (EBT) Privacy Policy (Draft), County of Los Angeles Department of Public Social Services (DPSS), 07/31/02.*
- Appendix CC *Electronic Benefit Transfer (EBT) Privacy Policy, Solano County Health & Social Services Department, September 2002.*
- Appendix DD *EBT Speaker Request Form, Alameda County Social Services Agency.*
- Appendix EE *EBT Informational Material Order Form, Alameda County Social Services Agency publication, 6/02.*
- Appendix FF *EBT Problem Form, Alameda County Community Food Bank-EBT Advocacy Project.*

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