

# Attachment 3

*Questions and suggested procedures to aid the reviewer in determining the State agency's compliance with regulations or guidance in:*

- 1) 7 CFR 274.3(d)(ii)(2) regarding the security of the EBT system –
  - a. Who determines who may have access to the EBT system administrative terminals?
  - b. Is there a periodic review to determine if staff still needs access to the EBT system? If yes, how frequently is this done? Who performs the review?
  - c. Do audit trails exist at the State and/or contractor listing every transaction by user ID (refers to non-POS transactions)? If yes, how is this audit trail protected? Who receives reports and what is done with them? Have the State provide a copy of the reports.
  - d. Determine from the reports if there have been any unusual access patterns or unauthorized access attempts.
  
- 2) 7 CFR 274.12(i)(3)(i) regarding the security of stored EBT cards –
  - a. How are cards secured? Who has access to the cards?
  - b. Who determines when new card stock is needed? What are the procedures for receiving/replacing card stock?
  - c. How do the counties inventory card stock? Does an independent party check inventory counts? If yes, who does this and how often does it occur?
  - d. How are returned cards handled? Are they stashed or logged by the State or the State's EBT vendor? If logged, have the State provide a copy of the logs.
  - e. Are returned cards stored by the State? If yes, how long are they kept in storage?
  - f. What destruction procedures are in place for returned cards?
  
- 3) Handbook 320, Disaster Food Stamp Program Handbook (May 1995) and EBT Disaster Plan Guide (October 2000) -
  - a. Does the State agency have a disaster plan that addresses EBT operations? If yes, have the State provide a copy of the plan.
  - b. Did the State negotiate and work with its EBT processor to design, develop, and incorporate an EBT disaster system within the processor's current operating platform?
  - c. Did the State work with its information technology staff to integrate the disaster system with the State's eligibility system?

- d. Did the State address particular requirements such as card and benefit issuance, card handling and security, data entry and access, and disaster issuance reconciliation and reporting (FNS 299 Report)?
- e. Will the EBT card get into the hands of recipients within the FNS expected timeframe of no more than 3 days?
- f. How will the State determine if there will be an adequate number of authorized retailers open, working POS terminals, and available telecommunications?
- g. How does the State staff/contractor anticipate access to benefits by determining which retailers will be open in expected disaster areas? e.g. back-up generators, satellite communication if telephone lines are interrupted.
- h. Did the State create stand-in manual voucher procedures?
- i. Will the State produce disaster cards in advance? Will the State produce quantities necessary once a disaster strikes?
- j. Will the State continue with regular card production? (The State would need a separate, expedited process to produce emergency EBT cards in a disaster situation.)
- k. Is there a secure facility to house pre-loaded disaster EBT cards?
- l. What is the delivery plan for disaster cards?
- m. How will PINs be generated? Will the PIN be generated by the system for each card?
- n. Will PIN select devices be dispatched to each disaster issuance site? If yes, this requires a telephone line.
- o. Will the cards be pre-pinned, using the last four digits of the PAN? If yes, would the card be active at the point of issuance? (This does raise benefit security issues if the card is lost or stolen.)
- p. Does the EBT Disaster Plan address account setup?
- q. Does the Plan address recipients temporarily housed outside of disaster areas?
- r. Did the State build in alternative procedures for handling applications and card/benefit distribution when their eligibility and EBT systems cannot communicate with staff taking disaster applications and issuing EBT cards and benefits? If yes, explain these procedures. (Options include laptop computers with software allowing remote disaster sites to connect with an EBT host system and cellular and satellite communications.)
- s. Disaster benefit applicants may be first time recipients. How will training be conducted? What material will be distributed?
- t. Does the State plan to expunge benefits from disaster EBT accounts in a shorter time than is normally done in the ongoing program? If yes, what is the expungement timeframe? Recipients should be advised of this timeframe at the time of application.
- u. If applicable, retailers need to be made aware of changes in card features (e.g. no recipient name, different color), changes to floor limits, and the use of manual vouchers, etc. How are retailers going to be notified of these changes? (If necessary, messages could be placed at the beginning

of any call placed to the toll-free retailer customer service number or to the automated voucher approval toll-free number.)

- v. Does the Plan include scripts for customer service personnel? (The State should expect a significant spike in customer service calls.) If yes, provide examples of the scripts. (If necessary, messages could be placed at the beginning of any call placed to the toll-free client customer service number.)
- w. How has the State prepared to increase staffing at disaster intake and issuance sites?
- x. Does the State do ongoing training on disaster eligibility, application, and issuance procedures with county and state staff? If yes, what are the schedule and training topics that are included?
- y. Does the State have a contingency plan that allows for relocating staff to key-enter disaster data? If yes, what is the plan?