

Issue Alert

14-01-05

Program Area:	Family Independence Program (FIP), State Disability Assistance (SDA), and Food Assistance Program (FAP)	
Issue Summary:	Changes have been made concerning front desk issuance and other issues surrounding Electronic Benefit Transfer (EBT) cards	
Persons Affected:	All applicants and recipients of the above captioned programs	
Date:	January 15, 2014	
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BACKGROUND

DHS has detailed rules on the issuance and internal security of Electronic Benefit Transfer (EBT) or “Bridge” cards, and there are criminal penalties for fraud or abuse related to EBT cards. DHS uses these cards to distribute most public assistance program benefits. Historically the cards were issued by the card vendor, usually by mail to the client. However, for clients who use their local DHS office for their mailing address, cards were always mailed to the local offices for those clients.

WHAT'S HAPPENING?¹

Effective January 1, 2014, DHS has added to the requirements for issuing Bridge cards at the front desk of the local DHS office (also referred to as receiving the card “over the counter” or “OTC”). Changes were also made concerning “program integrity” and reconciliation of Bridge cards issued by a local office’s front desk. Note that this applies to FIP, SDA, and FAP Bridge cards only.

¹ Please note that DHS failed to post Bridges Policy Bulletins 2013-001 and -002 online as future policy prior to the effective date of January 1, 2014. The old policies affected by the Bulletin were removed on January 1 and replaced with new policies with no notice. This means that the old and new policies – although the new policies are “redlined” – cannot be compared side-by-side for a complete and accurate review. Note that DHS may choose to employ this method of announcing policy in the future.

Under the new policy, Bridge cards for FIP, SDA, and FAP can be issued by a local DHS office front desk on receipt of an email request from the DHS caseworker (eligibility/family independence specialist). The email must list “the grantee's name and recipient identification.” It is not clear what “grantee,” “recipient,” and “identification” mean in this context. The front desk clerk must print a case summary. The “cardholder” must show a photo ID to pick up the card. Authorized representatives are still precluded from picking up EBT cards.

As before the new policy language, this option may be especially helpful for clients who are homeless or who do not otherwise have reliable mail delivery. The policy is unclear about the circumstances when a worker will request front desk issuance.

PROGRAM INTEGRITY CHANGES

The “program integrity” sections of the policy explain DHS’s continuing and publicized efforts to reduce FIP, SDA, and FAP EBT card fraud and abuse, such as utilizing client and retailer education and training as to proper use, including: videos in local office lobbies, a toll-free phone number, and written materials sent to clients upon eligibility. A list of “don’ts,” summarized from client materials, is provided in the policy text itself.

EBT CARD RECONCILIATION CHANGES

Regarding the “reconciliation” sections of the policy, they state that a monthly reconciliation is performed by an independent DHS employee using a more secure system, and the form and signature for each issuance of an EBT card is verified. FIP, SDA, and FAP cards without forms on file will be verified to ensure receipt, and *the number of cards issued for each client will be logged*. Detailed steps for DHS case workers to perform card replacements and reconciliations are listed in the new sections of the policy.

This updated policy is announced in Bridges Policy Bulletin BPB 2014-002, the Bulletin is available on p. 1 at: <http://www.mfia.state.mi.us/olmweb/ex/BP/Public/BPB/2014-002.pdf>, and the policy itself is available at BAM 401-E (see “redlined” sections): <http://www.mfia.state.mi.us/OLMWeb/exf/BP/Public/BAM/401E.pdf>.

WHAT SHOULD ADVOCATES DO?

1. Remind clients about best practices with their EBT cards and increasingly strict DHS rules on issuance and handling of FIP, SDA, and FAP cards, as highlighted in this update.
2. Help clients who need it obtain their EBT cards at the front desk of their local DHS offices.
3. Contact the Food Assistance Helpline at 800-481-4989 for questions about the Food Assistance Program.
4. Help clients request an administrative hearing and find legal advice if they experience an adverse case action related to their FIP, SDA, and FAP EBT cards.

WHAT SHOULD CLIENTS DO?

1. Take good care of your EBT card and learn DHS's rules about them.
2. Let your caseworker know if there is a good reason why you want to receive your Bridge card at the DHS office instead of through the mail.
3. Ask your local DHS office for help if you have a concern or problem with your card or need a replacement.
4. Request an administrative hearing and seek legal advice if you have a problem with DHS about your EBT card.
5. Food Assistance advocates are available to answer questions toll-free at 800-481-4989.

FINDING HELP

Legal aid and legal services offices may handle these types of cases without a fee. You can locate the offices that serve your county on the Michigan Legal Help Web Site, <http://www.michiganlegalhelp.org/>, in the yellow pages under "attorneys," or by calling the toll-free lawyer referral number, 800-968-0738.