



A Tradition of Stewardship
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NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY
Self Sufficiency Services Division

POLICY AND PROCEDURE:

EBT Cash Exemption

REVIEW FREQUENCY:

Every two years

POLICY # 2000600-2005-20

DISTRIBUTION:

- Employment Services
- Eligibility Services
- Quality Mgmt

EFFECTIVE DATE: August 1, 2003
 ORIGINAL DATE OF ISSUE: August 1, 2003
 LAST REVISION DATE: August 7, 2020

APPROVAL: *Joana Baptista* *8/13/20*
 Eligibility Services Manager Date
 APPROVAL: *Lynn Perry* *8/13/20*
 SSSD Deputy Director Date
 APPROVAL: *Joana Baptista* *9-7-2020*
 HHS Director Date

POLICY STATEMENT:

It is the policy of the Napa County Health and Human Services Agency (NCHHSA) to follow the California Electronic Benefit Transfer (EBT) Law which states:

The system shall provide for reasonable access to benefits to recipients who demonstrate an inability to use an electronic benefits transfer card or other aspect of the system because of disability, language, lack of access, or other barrier. These alternative methods shall conform to the requirements of the Americans with Disabilities Act, including reasonable accommodations for recipients who, because of physical or mental disabilities, are unable to operate or otherwise make effective use of the electronic benefits transfer system. (W&I Code Section 10072(d))

ADMINISTRATION:

Eligibility Specialist (EW)

DEFINITIONS:

None

END OF POLICY

PROCEDURE

I. Exemptions from EBT

- A. CalWORKs (CW) cash aid recipients must receive their CW grant by EBT unless they are exempt from EBT issuance. Reasons for exemption include recipients who have:
 - 1. Their benefits deposited into an account through direct deposit
 - 2. Their benefits being administered through the voucher/vendor or money management process
 - 3. A disability that keeps them from accessing and/or using the EBT system
 - 4. Other barriers

II. Criteria for Determining Exemption

- A. Physical or mental capacities or conditions
 - 1. Individual has a temporary or permanent physical or mental condition preventing them from successfully using the Automated Teller Machines (ATMs) or Point of Sale (POS) devices necessary to access benefits via EBT. If an individual meets those conditions, they may receive their cash benefits via warrant issuance. In order to qualify for warrant issuance, an individual must have either:
 - a. A condition that is readily apparent to the EW **or**
 - b. Provide written verification (CW 61 or its equivalent) signed by a doctor or medical licensed practitioner identifying the condition and its expected duration.
 - 1) If the EW already possesses documentation of the disabling condition, the existing documentation can only be accepted if it supports the recipient's claim that their condition makes the use of EBT unfeasible. For example, the EW may have a CW 61 from a doctor exempting a participant from Welfare-to-Work activities due to an injury such as a broken arm. A broken arm, however, does not, in itself, render an individual unable to use ATM or POS devices.
- B. Other Barriers
 - 1. A recipient may also continue to receive their benefits via warrant due to other barriers preventing them from successfully using EBT.
 - a. Other Barriers may include, but are not limited to, remoteness or language barriers.
 - 2. A request may be approved by the EW on a case-by-case basis, with approval from a supervisor, with the understanding that all other options (additional training, direct deposit, Designated Alternate Cardholder) have been explored with the recipient.

III. Exemption Requests

- A. If an applicant/recipient requests exemption from the Cash EBT issuance method based on a temporary or permanent condition, the EW:
 - 1. Provides the TEMP 2203 – Request for EBT exemption form to the applicant/recipient.
 - 2. Updates the CW issuance method on the Issuance Method Detail to either Warrant or Direct Deposit
 - 3. If additional verification is needed, provide the client with the M16-325B – EBT Exemption – Need Additional Facts notification Notice of Action (NOA).
 - a. Allow sixty (60) days for any additional verification needed.
 - 1) During the sixty (60) day period the individual may receive their cash benefits via a warrant.
- B. Approving Exemption Request

1. If the exemption request is approved, the EW shall:
 - a. Update the CW issuance method on the Issuance Method Detail page to either Warrant or Direct Deposit.
 - b. Send the M16-325A – EBT Exemption Approval NOA to the participant
 - c. Document approval on the TEMP 2203 by completing the following sections:
 - 1) Verification Provided
 - 2) Exemption Granted
 - 3) If Yes, alternate method to be used
 - 4) Date Client Notified
 - 5) Worker’s Initials
 - 6) Worker’s Name
 - 7) Worker’s Number
 - d. Image and index the TEMP 2203
 - e. Create a task to review case at the time condition is expected to end (if applicable)
 - f. Create a journal entry to document actions taken
- C. Denying Exemption Request
 1. When the EW has all the required information and documentation needed and the exemption request is denied OR required information and documentation is not provided in the 60 day timeframe, the EW shall:
 - a. Update the CW issuance method on the Issuance Method Detail Page to “EBT” if changed to other form of issuance during 60 day verification period.
 - b. Send the M16-325C – EBT Exemption Denial NOA to the participant
 - c. Document denial on the TEMP 2203 by completing the following sections:
 - 1) Verification Provided
 - 2) Exemption Granted
 - 3) Date Client Notified
 - 4) Worker’s Initials
 - 5) Worker’s Name
 - 6) Worker’s Number
 - d. Image and index the TEMP 2203
 - e. Create a journal entry to document actions taken

IV. Ending Exemption

- A. The exemption from EBT is ended when:
 1. The temporary disability or condition that kept the recipient from using the EBT card has ended.
 - a. Send the M16-325D – EBT Exemption Ended NOA to the recipient.
 2. The recipient was exempt from EBT because they had direct deposit and either:
 - a. The bank closed the recipient’s account and direct deposit is no longer available, **or**
 - b. The recipient asked that direct deposit be stopped
 - c. Send the M16-325E – Direct Deposit Cancelled NOA to the recipient.

REFERENCES:

[ACIN I-35-02](#) – EBT Policy Issues

[ACIN I-57-02](#) – Transmittal of Instructions, Forms, and NOAs for use with EBT

[MPP 16-325.3](#)

FORMS

- M16-325A EBT Exemption Approval NOA (available in C-IV)
- M16-325B EBT Exemption: Need Additional Facts NOA (available in C-IV)
- M16-325C EBT Exemption Denial NOA (available in C-IV)
- M16-325D EBT Exemption Ended NOA
- M16-325E Direct Deposit Cancelled NOA
- TEMP 2203 Request for EBT Exemption (available in C-IV)

CONTACT PERSON(S):

Shanna Gardner, Staff Services Analyst

END OF PROCEDURE

REVISION HISTORY:

Revision	Date	Description of Change	Requested By
1.0	02-13-14	Biennial Review, Updated to include C-IV Process	S. Gardner, SSA
2.0	02-19-16	Biennial Review	S. Gardner, SSA
3.0	03-02-18	Biennial Review – No Changes	S. Gardner, SSA
4.0	08-07-20	Biennial Review – No Changes	S. Gardner, SSA