

8.0 Food Benefit Issuance/EBT Card Security***Effective Date: 5/1/21*****8.08 WIC EBT Card Security*****Implementation Date: 7/1/21***

PURPOSE: To ensure the local agency accounts for all WIC Electronic Benefit Transfer (EBT) cards issued, or in inventory.

DEFINITIONS:

Active EBT Cards means the range of EBT cards located in general clinic/local agency secure storage, that can be issued to clients.

Closed EBT Cards means all EBT cards in a range available to be issued to clients have been exhausted, and status is marked as "Closed."

Daily Use EBT Cards means EBT cards that have been removed from secure storage and are available for staff to issue and are returned to secure storage at the end of the day.

EBT Card means food instrument utilized to make WIC food benefits available to clients at authorized vendors.

In-stock EBT Cards means a range of EBT cards that have been inventoried as received at the clinic/local agency and have not yet been placed in "Active" status.

Non-EBT Card Issuance Staff means local agency staff whose role does not permit issuance of EBT cards to clients.

Range means a group of sequential card numbers. A box of EBT cards can be divided into several ranges.

A. POLICY

1. The local agency is fiscally responsible and accountable for proper issuance of each EBT card assigned to its inventory from the EBT card provider.
2. EBT cards for all clinics within a local agency/clinic shall be stored in a secure location with limited staff access.
3. EBT Card Inventory:
 - a. All cards received shall be recorded in MI-WIC as "In-stock" upon receipt. The local agency shall determine how the cards in a box will be divided in ranges based on agency/clinic needs.

- b. Once a range is entered into MI-WIC on a new line, this range shall not be removed.
 - c. When an “In-stock” range of EBT cards are needed for staff assignment to clients, status should be changed to “Active” and a WIC EBT Card Issuance Log shall be created (See Policy 8.09, WIC EBT Card Issuance and Exhibit 8.09A, WIC EBT Card Issuance Log).
4. WIC EBT Card Inventory Control Log
- a. EBT cards removed from an “Active” range in secure storage for daily use by a staff member shall be recorded on the WIC EBT Card Inventory Control Log at the beginning of the day, with the date and initials of the staff member(s). (See Exhibit 8.08A, WIC EBT Card Inventory Control Log). A separate WIC EBT Card Inventory Control Log shall be initiated every month.
 - b. Daily use EBT cards shall always be kept in an area under staff supervision. When not in use, cards shall be kept in locked storage with limited staff access.
 - c. Card stock shall be available to individual staff in increments of 20 cards or a reasonable amount based on daily client activity.
 - d. The beginning and ending EBT card number in the range of daily EBT cards shall be documented and initialed by a staff member(s) on the WIC EBT Card Inventory Control Log at the end of the day.
 - e. Non-EBT card issuance staff shall physically inventory “Active” range of EBT cards every month. The WIC EBT Card Inventory Control Log shall be signed and dated to document that the inventory was performed (See Exhibit 8.08A, WIC EBT Card Inventory Control Log)
 - f. Report **any** EBT card missing from inventory **immediately** to MDHHS/WIC Consultant DuJour (1-800-WIC-1636, press 1 and 2). Staff shall document the card as missing on the WIC EBT Card Issuance Log.
 - g. The WIC EBT Card Inventory Control Log shall be retained in accordance with Policy 1.06, Record Retention and Destruction, based on the last date entry on the log.

B. GUIDANCE

1. Only cards within an “Active” range can be issued to clients.
2. In-stock EBT Card ranges do not need to be inventoried monthly.

3. A range of EBT cards may be transferred to another clinic. Refer to MI-WIC Help.

References:

7 CFR 246.12 (p)

Cross References:

- 1.06 Record Retention and Destruction
- 8.09 WIC EBT Card Issuance
- 8.09A WIC EBT Card Issuance Log

Exhibits:

- 8.08A WIC EBT Card Inventory Control Log