

# Cash Assistance Program for Immigrants (CAPI) Program Guide (PG) Letter #33

March 24, 2014

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**Subject**            **ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT INSTRUCTIONS**

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**Effective**        Upon receipt

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**Reference**        All County Letter (ACL) 13-67

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**Purpose**            To inform staff that general EBT instructions have been added to the CAPI PG and provide instructions for the implementation of Assembly Bill (AB) 2035, which amended Welfare & Institutions (W&I) Code section 10072 to require the prompt restoration of EBT cash benefits lost due to electronic theft. Electronic theft occurs when a recipient (or authorized representative) has not lost physical possession of their EBT card and money is stolen from their EBT account electronically (often called skimming).

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**Background**      Most CAPI benefits are issued via EBT.

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**Highlighted Changes**    W&I 10072 instructs counties to replace benefits that have been lost due to electronic removal from the EBT account without the use of the EBT card and/or PIN.

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**Required Action**        Worker must follow the instructions in CAPI PG 99-105.9 when a CAPI recipient reports that their benefits have been stolen electronically.

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**Automation Impact**      [BEnDS 6358](#) has been created with instructions on issuing the replacement benefits. This BEnDS needs to be followed until this process is automated in CalWIN.

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# Cash Assistance Program for Immigrants (CAPI) Program Guide (PG) Letter #33, Continued

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**Forms Impact** Form EBT 2259 and notices M44-350K, M44-350L, TEMP WI 10072, and TEMP WI 10072A have been loaded into Xerox and are available to be ordered.

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**ACCESS Impact** ACCESS agents must follow the instructions in CAPI PG 99-105.9 when a CAPI recipient calls to report that their benefits have been stolen electronically.

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**Scanning Impact** Form EBT 2259 and the notices M44-350K, M44-350L, TEMP WI 10072 and TEMP WI 10072A are recognized by CERMS.

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**Other Program Impact** CalWORKs, Refugee Cash Assistance (RCA), and General Relief (GR) will be issuing separate instructions for those programs. CalFresh benefits are not affected by this change.

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**Quality Control (QC) Impact** The California Department of Social Services has not specified a Quality Assurance requirement for CAPI and appeals are handled through the usual State hearing process.

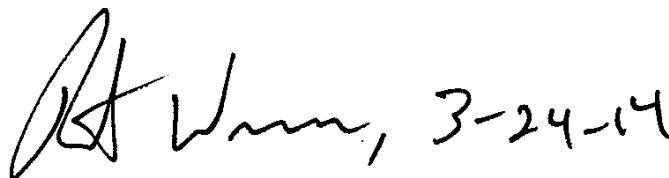
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**Summary of Changes** The table below shows the changes to the CAPI PG.

Section	Changes
99-105.8	Added EBT instructions.
99-105.9	Added instructions for electronic theft.

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**Approval for Release**



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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM

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### A. Background

San Diego County utilizes an on-line electronic benefit transfer (EBT) issuance system in which public assistance benefits are stored in a central computer database and can be electronically accessed by cardholders at a point-of-sale (POS) terminal, automated teller machine (ATM), and other electronic fund transfer devices utilizing a reusable plastic card.

Recipients of public assistance in California access their issued benefits with the “Golden State Advantage” EBT card which looks like a bank/ATM debit type card. EBT is currently used in all states, the District of Columbia, Puerto Rico, the Virgin Islands, and Guam.

When a person determined eligible the recipient's benefit information is loaded electronically each month into a central computer account during the certification period.

A magnetic-strip on the plastic card is used to access the recipient's account in lieu of issuing cash warrants to purchase goods or services or in lieu of issuing CalFresh coupons to purchase food items at authorized food retailers. Cardholders shall use the same EBT card to access CalFresh and cash benefit accounts which include CalWORKs, Cash Assistance Program for Immigrants (CAPI) and General Relief (GR).

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### B. The EBT System

The EBT System performs the following services:

- Distributes benefits to cardholders through point-of-service (POS) devices
- Manages the EBT card information for the authorization of transactions and the status of cards
- Maintains authorization files of cases, clients and benefits
- Provides 24 hours a day, 7 days a week customer service support for cardholders and merchants
- Provides on-line access to the authorization database and transaction history files
- Reports and reconciles all financial and maintenance activities including out-of-state card transactions

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

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### The EBT System (continued)

- Pays merchants for benefits they distribute
- Provides merchant file management

For additional information about the California EBT Project clients, workers or retailers can visit [www.ebtproject.ca.gov](http://www.ebtproject.ca.gov).

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### C. Cash Benefit Restrictions

California law establishes CAPI as a welfare program which provides cash aid and services to eligible needy California individuals. The intent of CAPI is to assist in providing life sustaining necessities such as food, clothing and shelter.

California EBT cardholders **cannot** access cash benefits at ATMs and POS devices in stores that are **not** federally authorized to accept CalFresh benefits due to the fact they do not sell food.

Additionally, California EBT cardholders **cannot** access cash benefits at casinos, poker rooms, card rooms, adult entertainment businesses, bail bonds businesses, night clubs/saloons/taverns, bingo halls, race tracks, gun/ammunition stores, cruise ships, psychic readers, smoking shops, cannabis dispensaries, tattoo/piercing shops, and spa/massage salons.

California's EBT vendor has also deactivated cash access to EBT cardholders at some out-of-state casinos, adult entertainment establishments, and cruise ships.

For a listing of Food and Nutrition Service (FNS) approved retailers click on the following link: [www.snapretailerlocator.com](http://www.snapretailerlocator.com).

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### D. Out-of-State Card Usage

CAPI regulations allow for individuals to be out-of-state for up to 90 days. After 90 days workers are required to follow-up and inquire about the individual's absence from the state.

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

### Out-of-State Card Usage (continued)

All 58 California counties receive monthly reports that identify individuals who have performed EBT transactions outside of California. This information is used by counties to investigate whether an individual is complying with eligibility requirements regarding residency in California.

Various other EBT reports are generated for counties that provide information to better assist in identifying potential cases of fraud (e.g. out-of-state usage, excessive card replacement, etc.).

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### E. Process Overview

Step	Action
1	The worker determines the applicant's eligibility for benefits.
2	The case and recipient are added to the EBT system database by using the EBT Administrative Terminal or batch maintenance process at application.
3	Cards are issued to the Primary Person through the EBT Administrative Terminal. Cardholders will then select their Personal Identification Numbers (PIN) using a PIN selection device in the County office after the intake interview.
4	The County sends updated benefit authorizations to the EBT system for the case and recipient. A batch file, generated from the County's computer, is sent through a file transmission link.
5	Transactions are sent daily when cases are first granted and monthly for ongoing benefits.
6	Merchants review their EBT total receipts at the end of their business day. The EBT System's POS devices provide administrative transactions to report the merchants POS activity.

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

### Process Overview (continued)

Step	Action
7	Cardholders can call an audio response unit (ARU) to check their benefit balance, review their last 10 transactions, or be transferred to a Customer Service representative to report their card lost, or stolen. Cardholders can call the toll-free ARU phone number 24 hours a day, 7 days a week. Merchants can call an ARU to receive authorization for voucher transactions when the EBT system is down. This toll-free number is also available 24 hours a day, 7 days a week.
8	Cardholders can also visit the <a href="#">EBT Client Website</a> to perform the activities listed above.
9	Caseworkers, other County personnel and merchants can call the Customer Service Desk (1-877-328-9677) at any time. To speak with a representative Merchants call the toll-free ARU POS Merchants Management Support Line (1-800-831-5235) and select the Help Desk option. The EBT vendor provides customer service support 24 hours a day, 7 days a week, to answer questions or address concerns.
10	Money is moved daily to networks, retailers, and third-party processors to pay transactions performed by cardholders against their EBT account.
11	The EBT System reports all daily activity to the County system. Reports of all maintenance and financial activity are created after the system cutoff time. A file of the daily financial activity is also provided to the County along with other reports.
12	The state transfers funds to its settlement account for EBT.

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### F. Toll-Free Customer Service Number

The 24 hours a day, 7 days a week EBT Customer Service (1-877-328-9677) capability includes:

- Changing a card's status
- Deactivating a recipient's personal identification number (PIN)
- Changing a PIN

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# 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

**Toll-Free  
Customer  
Service  
Number**  
(continued)

- Viewing cardholder account and card information
- Viewing transaction history detail
- Providing the recipient with a copy of their transaction history

The Telecommunications Relay Service for Hearing/Speech Impaired is: TTY: 1-800-735-2929

Click on the attached link for a brochure about the [California Electronic Benefit Transfer \(EBT\) Card](#) which is available in multiple languages.

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**G.  
Worker Re-  
sponsibility**

The primary role of the worker is to explain the EBT system, authorize cash aid benefits to eligible recipients and to generate a request to clerical to issue/replace an EBT card and/or PIN.

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**H.  
Benefit  
Availability/  
Staggered  
Issuance**

Public Assistance benefits are issued on a staggered basis for CAPI based on the last number of the recipient's case number:

If the case number ends in ...	Then the issuance date is the ...
1, 2, or 3	1 <sup>st</sup> day of the month
4, 5, 6, or 7	2 <sup>nd</sup> day of the month
8, 9, or 0	3 <sup>rd</sup> day of the month

Benefits are available on weekends and holidays. The balance of benefits at the end of the month will automatically be added to the next month's balance.

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

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### **I. Primary Person**

The “primary person” is the person who will be issued an EBT card, allowed to select a Personal Identification Number (PIN) and have access to the cash aid benefits. Most of the time the primary person will be the case payee/head of household. However, in some situations (for instance husband and wife), the payee/Head of Household may not be the person who would normally pay for rent or shop for food. If the worker is unsure who the primary person should be the client will be asked to identify the person who will receive the EBT card. The primary person can be any CAPI Assistance Unit (AU) member.

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### **J. Card/PIN Issuance and Replacement Procedures**

Before a card can be issued information on the primary person must be established in the Electronic Payment Processing and Information Control (EPPIC)/EBT system.

Prior to authorizing the issuance of the EBT card the worker will ensure that the primary person has signed the CSF 67 EBT Responsibility Statement. A new CSF 67 must be signed and maintained with each CAPI application. A copy of the primary person's valid picture identification will be scanned in the case file. The case file photo identification already in the case file will be compared to the recipient's verification along with comparing the recipient's signature to signatures in the case file.

[Refer to How To # 315 – How To Issue an EBT Card to the Primary Payee/AR](#)

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

### K. Replacing Lost/Stolen or Damaged Cards

#### **Lost/Stolen Cards**

The following actions must be taken for lost/stolen EBT cards.

Step	Who	Action
1	Primary person	Report lost/stolen cards to the EBT Customer Service Desk at their toll free number (1-877-328-9677) and have the card deactivated. This will prevent anyone from using the card to obtain benefits.
2	EBT Customer Service desk	Deactivate cards and instruct the recipient to call his/her worker.
3	Primary person	Call the worker to request a new EBT card.
4	Worker	Make an appointment for the primary person to come into the office to receive a replacement card and, if necessary, select a new PIN.
5		Complete and send a screen print of the <b>Maintain Card Requests</b> window in CalWIN authorizing clerical to issue a new card and if needed have the client select a new PIN.

It is important that the primary person understands the need to report a lost or stolen card to the EBT Customer Service Desk immediately. Any funds spent prior to a card being reported to the EBT Customer Service Desk will not be replaced.

**Note:** A new card cannot be issued unless the old card has been deactivated. Workers shall provide a replacement EBT card to the cardholder within 3 business days following the cardholder's request for a replacement card.

Refer to [How To # 143 – How To Request a Replacement EBT Card](#)

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## 99-105.8 ELECTRONIC BENEFIT TRANSFER (EBT) SYSTEM,

Continued

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**Replacing  
Lost/Stolen or  
Damaged  
Cards**  
(continued)

### ***Damaged Cards***

Primary persons who report that their card is damaged or not functioning properly are not to call the EBT Customer Service Desk. Since they have the card in their possession, their benefits are not at risk. The recipient must make an appointment with their worker to pick up a replacement card. When the recipient is in the office the worker will complete and send a screen print of the **Maintain Card Requests** window in CalWIN instructing clerical to reissue a new card and if needed have the recipient select a PIN. Before a replacement card can be issued the status of the old card must be changed from "active" to "card damaged".

### ***Forgotten or Compromised PINS***

If the primary person forgets his/her PIN or believes that someone else knows what it is they will be instructed to call the EBT Customer Service Desk (1-877-328-9677) to have a hold placed on the account. The Customer Service Desk will help the client to change their PIN or they can go to any FRC. When the client is in the office the worker will complete the **Maintain Card Requests** window and send a screen print to clerical instructing them to have the client select a new PIN.

**Note:** The worker must document an EBT card/PIN issued or replaced in the case comments.

CAP PG Letter #33 (3/14)

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# 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT

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## A. Purpose

To provide instructions for the implementation of Assembly Bill (AB) 2035, which amended Welfare & Institutions (W&I) Code section 10072 to require the prompt restoration of EBT cash benefits lost due to electronic theft. Electronic theft occurs when a recipient has not lost physical possession of their EBT card and money is stolen from their EBT account electronically (often called skimming).

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13-67

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## B. Introduction

W&I section 10072, the California Department of Social Services (CDSS) has established a protocol for recipients who believe their EBT cash benefits have been stolen via electronic theft to be able to report this, and if the report is determined to meet the requirements, to have the stolen benefits promptly restored into their EBT account. This protocol includes a reporting form, timelines for county review, instructions regarding when a referral for investigation is made, and notice of action language.

All cash assistance programs that use the EBT system to issue benefits are subject to the requirements stipulated in W&I section 10072. Those cash programs include California Work Opportunity and Responsibility to Kids (CalWORKs) and all Welfare to Work supportive services, Refugee Cash Assistance (RCA), Cash Assistance Program for Immigrants (CAPI) and General Relief (GR).

Repayments for loss due to electronic theft are reimbursed using 100% State General Fund dollars.

W&I section 10072 does not apply to CalFresh and California Food Assistance Program (CFAP) benefits. If a recipient believes that their CalFresh or CFAP benefits have been stolen as a result of electronic theft, they are to call the California EBT Customer Service Helpline to report the stolen benefits and file a Dispute Claim.

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## 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

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### C. AB 2035 Reporting Process

There are two ways the recipient will report the possible electronic theft:

1. Recipient contacts the California EBT Customer Service Helpline, which will explain the reporting process and refer the recipient to the County for additional information and submission of the EBT 2259. The Customer Service Representative (CSR) will provide a Dispute Claim Number to the recipient. The CSR will deactivate the recipient's EBT card and issue a new one.
2. Recipient contacts the County directly. The worker will explain the AB 2035 process to the recipient, provide the EBT 2259 form, and inform the recipient to also contact the EBT Customer Service Helpline to report the stolen benefits and file a cash dispute claim. The worker will deactivate the recipient's EBT card and issue a new one.

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### D. Report of Electronic Theft of Cash Aid Form (EBT 2259)

The EBT 2259 will be used by recipients to report claims of electronic theft and must be filled out completely, including a police report number, recipient signature and date. The EBT 2259 includes an instruction page to assist the recipient in completing the form. The instruction page also includes helpful tips for recipients, including how to keep the EBT card and Personal Identification Number (PIN) safe in order to help prevent electronic theft.

The recipient is required to file a police report, unless there is good cause. If the recipient does file a police report, he/she is required to write the police report number on the EBT 2259. A temporary police report number is also acceptable on the EBT 2259. The recipient is not required to attach a copy of the police report to the EBT 2259.

The worker may have to assist the recipient in completing the EBT 2259, including how to file a police report. This may include providing information about the location of the local police/sheriff station, providing the local non-emergency police/sheriff telephone number, and how to file a police report online, if available.

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## 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

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### Report of Electronic Theft of Cash Aid Form (EBT 2259) (continued)

Upon receipt of the EBT 2259, the worker shall review it to ensure the recipient has provided complete information. The worker shall review the case file and, if provided by the recipient, the police report. If necessary, the worker should ask questions regarding the recipient's stolen benefits claim to complete the EBT 2259.

The worker will also review the recipient's case file to see if they have had any other EBT 2259 filings within the last year and take appropriate actions (please see [Referrals for Investigation](#)). All EBT 2259 filings must be tracked individually to meet these referral requirements.

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### E. Good Cause for Not Filing a Police Report

The following are examples of good cause for not filing a police report:

- The police department is not taking reports for identity theft and/or financial fraud
- The police report form is not available in the recipient's native language and the police department does not have non-English speaking interpretive services
- There is a fee to file a police report
- The police department fails to provide disability accommodations
- The recipient is required to file a police report in person and one of the following applies:
  - The recipient does not have transportation
  - The recipient does not have money for gas, parking or a bus pass
  - The recipient's participation in Welfare to Work or Work Project would be impacted if they were required to submit an in-person report

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# 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

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**F.  
Recipient  
Timeframe for  
Filing a Claim**

The recipient should report the theft as soon as it occurs. However, claims filed for loss due to electronic theft are subject to the 90 calendar day time frame set forth under EBT regulations. Therefore, the recipient must contact the County, Customer Service Helpline, and complete an EBT 2259 within 90 calendar days from the date of the electronic theft transaction to be eligible for an AB 2035 repayment.

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**G.  
AB 2035  
Payment  
Process**

Upon receipt of a fully completed EBT 2259, the worker has 10 business days to issue an AB 2035 repayment. See [I](#) and [J](#), below, for exceptions to this timeframe. The AB 2035 repayment will not be counted as income or property in the month paid or in the next month.

After submission of a fully completed EBT 2259, and before issuing the AB 2035 repayment, the worker will check EPPIC each work day to determine if the cash dispute claim has been denied or approved by the State EBT Vendor. The State EBT Vendor has 25 calendar days to issue an approval or denial for the cash dispute claim. EPPIC provides EBT transaction activity for individual cases. Also, the worker may check the Statewide Automated Reconciliation System (SARS) "Claim Activity Report." This report lists the status of the EBT Vendor cash dispute claims (for example, new, approved, or denied).

<b>If the cash dispute claim ...</b>	<b>Then the worker shall ...</b>
has been approved by the State EBT Vendor,	not issue the electronic theft loss repayment, as the recipient has already been reimbursed by the State EBT Vendor. If a claim is approved, the recipient will receive an automated phone call from the State EBT Vendor that their EBT account has been credited.

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# 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

**AB 2035  
Payment  
Process  
(continued)**

If the cash dispute claim ...	Then the worker shall ...
<p>is denied by the State EBT Vendor before the 10<sup>th</sup> business day after the County has received the completed EBT 2259,</p>	<p>if applicable, issue the electronic theft loss repayment immediately.</p> <p>Note: In most instances the State EBT Vendor denies electronic theft claims when it appears that a legitimate EBT card and PIN was used to perform the cash transaction. The State EBT Vendor only investigates and makes benefit adjustments for system errors. The vendor does not investigate or determine electronic theft transactions.</p>
<p>has not been approved or denied by the State EBT Vendor within 10 business days from the date the County has received the completed EBT 2259,</p>	<p>if applicable, issue the electronic theft loss repayment no later than the 10<sup>th</sup> business day.</p>

\* A cash dispute claim that is based on electronic theft will almost always be denied by the State EBT Vendor as it looks like a valid transaction with a PIN and card used. W&I section 10072 states the recipient must be reimbursed promptly, so the worker can submit payment as soon as the cash dispute claim is denied. It would not be applicable to issue a repayment if it is not electronic theft. For example, if the card was lost or stolen.

\*\* To promptly restore benefits, 10 business days is the cutoff for reimbursement. Benefits must be restored if it is electronic theft, but not for a lost/stolen EBT card.

Follow the actions in [BEnDS 6358](#) to issue the electronic theft loss replacement benefits.

## 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

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### H. Overpay- ments

The worker must continue to check EPPIC for 25 calendar days from the date of the cash dispute claim to verify if the State EBT Vendor has approved or denied the recipient's cash dispute claim. If the cash dispute claim is approved after a worker has issued the electronic theft loss repayment, the second cash issuance is an overpayment. The worker will need to establish an overpayment, issue a Notice of Action (NOA), and begin collection of the ineligible amount in accordance with [CAPI PG 99-109.2](#). This shall be treated as an administrative error overpayment. In addition an EBT cardholder can voluntarily elect to reimburse all or a portion of the overpaid funds to the County in a lump sum (for example, Voluntary Cash Recovery).

An overpayment cannot be avoided if the electronic theft loss repayment is made before the EBT Vendor approves the cash dispute claim, as EBT rules do not allow the State EBT Vendor to stop the payment from being applied to the recipient's EBT account. However, it is anticipated that these types of overpayments will rarely occur.

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### I. Referrals for Investigation

A referral for investigation shall be made when the worker determines that, based upon an observation of conditions, knowledge of the case, or other sources of information provide reason to suspect that fraud exists or has been attempted.

Additionally, dollar and frequency thresholds have been established to determine when to make a referral for investigation. These thresholds do not preclude other situations or criteria the workers may determine necessitate a referral for investigation.

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# 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

## Referrals for Investigation (continued)

Situation	Action						
<ul style="list-style-type: none"> <li>• An electronic theft loss claim is equal to or exceeds \$1,000 and the claim amount is over the Maximum Aid amount for the assistance unit; or</li> <li>• More than one electronic theft loss approved claim has been processed during a 6 month period.</li> </ul>	<p>The worker shall make a referral for investigation</p>						
<p>When 3 or more electronic theft loss claims are filed within a 12 month period.</p>	<p>The worker shall make a referral for investigation and pend the electronic theft loss repayment for up to 25 calendar days</p> <p>Note: If PAFD determines that an investigation will not be initiated, the electronic theft loss repayment will be issued immediately but no later than 25 calendar days from the receipt of the completed EBT 2259.</p>						
<p>Electronic theft loss repayment is pended and PAFD determines an investigation will be initiated</p>	<p>The worker will monitor the status of the investigation and:</p> <table border="1" data-bbox="683 1283 1414 1688"> <thead> <tr> <th data-bbox="683 1283 1036 1314">If the investigation ...</th> <th data-bbox="1036 1283 1414 1314">Then the ...</th> </tr> </thead> <tbody> <tr> <td data-bbox="683 1314 1036 1465"> <p>is completed within 25 calendar days and the claim is determined to be fraudulent,</p> </td> <td data-bbox="1036 1314 1414 1465"> <p>electronic theft loss repayment will not be issued.</p> </td> </tr> <tr> <td data-bbox="683 1465 1036 1688"> <p>is completed within 25 calendar days and PAFD determines that fraud did not occur,</p> </td> <td data-bbox="1036 1465 1414 1688"> <p>electronic theft loss repayment shall be issued immediately upon completion of the investigation, but no later than the 25<sup>th</sup> day.</p> </td> </tr> </tbody> </table>	If the investigation ...	Then the ...	<p>is completed within 25 calendar days and the claim is determined to be fraudulent,</p>	<p>electronic theft loss repayment will not be issued.</p>	<p>is completed within 25 calendar days and PAFD determines that fraud did not occur,</p>	<p>electronic theft loss repayment shall be issued immediately upon completion of the investigation, but no later than the 25<sup>th</sup> day.</p>
If the investigation ...	Then the ...						
<p>is completed within 25 calendar days and the claim is determined to be fraudulent,</p>	<p>electronic theft loss repayment will not be issued.</p>						
<p>is completed within 25 calendar days and PAFD determines that fraud did not occur,</p>	<p>electronic theft loss repayment shall be issued immediately upon completion of the investigation, but no later than the 25<sup>th</sup> day.</p>						

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# 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

## Referrals for Investigation (continued)

Situation	Action	
	The worker will monitor the status of the investigation and:	
	<b>If the investigation ...</b>	<b>Then the ...</b>
	is not completed within 25 calendar days,	electronic theft loss repayment must be issued by the 25 <sup>th</sup> day, while the investigation is pending.
results show evidence of fraud,	worker shall pursue appropriate administrative actions.	

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### J. High Dollar Claims

An electronic theft loss claim that is equal to or exceeds \$2,000 may require an extensive review and/or investigation of the case. Thus workers are not required to issue the electronic theft loss repayment until case specific facts have been gathered to allow the worker to make an informed decision of whether to approve the claim.

The worker should issue the electronic theft loss repayment immediately if the review or investigation determines the repayment is appropriate. The review of these claims shall be given priority, referred for investigation if necessary and completed as soon as administratively possible.

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## 99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued

**K. Notices of Action** Four new Notices of Action (NOA) have been developed for electronic theft loss cases.

No.	Title	Used when an Electronic Theft Loss
M44-350K	EBT Replacement Denial	Repayment is denied
M44-350L	Notice of Overpayment	Overpayment occurs
TEMP WI 10072	EBT Replacement Approval	Repayment is approved
TEMP WI 10072A	EBT Replacement Review	Repayment is delayed pending county review

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**L. EBT Benefit Type Code** A new EBT benefit type code has been established and shall be used when issuing electronic theft loss repayments. The EBT benefit type information is:

Code	Entry
Benefit Type Name	Electronic Theft Replacement Cash Benefits (ETRCB)
Benefit Type Code	ETRCB
Aid Code	Z5

Electronic theft loss repayments shall be issued through CalWIN (see [BEnDS 6385](#)). The electronic theft loss repayment must not be issued using the original aid code.

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**M. Security Breaches** W&I section 10072 gives authority to CDSS to reinstate benefits immediately for breaches of security known by CDSS, without the need for recipient reporting and verification.

In these isolated situations, CDSS will immediately be in contact with the county and consortium staff and will provide further instructions. Impacted recipients will be notified that their benefits have been restored.

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## **99-105.9 ELECTRONIC BENEFIT TRANSFER (EBT) ELECTRONIC THEFT, Continued**

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**N.**  
**CDSS Contact** Workers must contact the CAPI Program Specialist through their Corrective Action Liaison. The CAPI Program Specialist will contact CDSS so that CDSS can track trends in electronic theft, improve the reporting process, and maintain program integrity.

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