



**HUMAN SERVICES**  
DEPARTMENT

Michelle Lujan Grisham, Governor  
David R. Scrase, M.D., Secretary  
Karmela Martinez, Acting ISD Director

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## General Information Memorandum

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### ISD-GI 19-11

**TO:** ISD Employees

**FROM:** Karmela Martinez, Acting Division Director, Income Support Division 

**RE:** Amended Procedures for Over-the-Counter (OTC) EBT Cards and Process to Verify ID for OTC's

**DATE:** February 15, 2019

This GI rescinds GI 17-37 Procedures for Over-the-Counter (OTC) EBT Cards.

The purpose of this GI is to give instruction on acceptable methods to verify the identity of the individual requesting the OTC EBT card. Once identity has been established the processes outlined in this GI will be followed to activate and issue the OTC EBT card.

Please remove GI 17-37 immediately and replace with this GI.

County Directors please review this GI with all staff between today and March 29, 2019. Each staff person is required to sign the attached sign-in sheet to validate they have reviewed and understand the information contained in this GI. County Directors, please submit one sign-in sheet per County Office to the EBT Unit, via email at [HSD-OTC-Requests@state.nm.us](mailto:HSD-OTC-Requests@state.nm.us), no later than March 29, 2019.

If the customer is approved for the OTC EBT card, the card will be issued to the customer the same day and the procedures, discussed in this GI, will be followed to issue and to activate the OTC.

The following steps must be taken to issue the OTC:

1. Verify identity:
  - a. The identity of the individual requesting an OTC must be verified. This can be done by reviewing the Electronic Case File (ECF) in ASPEN to view the identity verification that was utilized at certification. Identity is a mandatory verification that must be verified prior to certification for households at initial application. Therefore, the verification will be in the ECF or if an electronic data source is used to verify identity, this must be documented in case comments. The document

found in the ECF that is being utilized must also be printed and placed within the OTC log issuance book.

- b. When a person other than the person who is listed on the Alternate Payee/Authorized Representative (AR) screen requests an OTC EBT card for the household, written authorization from the head of household (HOH) must be sent with this person. If a recipient has assigned an AR on the SNAP application or at the point of interview, written authorization is not required. Every effort must be made to verify or authenticate that the written authorization document was written by the HOH. If a telephone number is available, field staff should call and verify the document with the HOH. If unable to reach the HOH to verify, the AR cannot be added. The AR's picture ID must be verified and a copy of the document and any written authorizations must be maintained with the card issuance log.
- c. If the ECF does not contain acceptable verification of identity, review the case comments to determine how the individual's identity was verified at certification. Make a determination if this is an acceptable method to verify identity.
- d. If you are unable to validate how the individual's identity was verified based on documents in the ECF or by case comments, identity must be verified prior to issuing the OTC.
- e. If the verification of the individual's identity was not done by a form of picture identification, identity must also be verified by confirming their date of birth, current and previous address, household members on the case, etc. Remember, you cannot ask for their SSN.

2. Acceptable forms of verification to verify identity.

In accordance with 8.100.130.9 NMAC and 8.100.130.13 NMAC, identity must be established in accordance with the hierarchy of verification.

- a. Documentary evidence: Shall be used as the primary source of verification. Documentary evidence that establishes identity are ancillary documents in the client's possession that would reasonably require proof of identity, such as but not limited to, work or school ID, pay stubs, drivers licenses, social security cards, birth certificates, etc. A document which reasonably establishes a client's identity is one that only someone with the client's identity may obtain. For instance, a library card may be issued to a client, but a library card may not be a valid document as the client did not need to produce proof of identification in order to obtain that card. However, a pay stub may be a valid document as it is reasonable to assume only the employer would pay the client and the employer had verified the client's identity. Case comments should reflect the specific ID criteria verified, personal validation questions were asked and should be printed and placed in EBT log book.

If documentary evidence is not readily available, other acceptable methods of verification are listed below, in the order they should be considered, and include:



- b. Electronic data: Electronic data checks, such as SOLQ, can be used to verify identity; the data source must be 1<sup>st</sup> party information and would reasonably require proof of identity to collect and produce information. SOLQ can be used to verify identity if the client has a pending, denied or active claim with the social security administration (SSA). Personal validation questions should also be verified and notation of utilizing a SOLQ search and confirmation of personal validation questions being asked should be entered in case comments. SOLQ ID verification should be printed and placed in the OTC log book.
- c. Collateral contact: An oral or written confirmation by a person outside the household with knowledge of the recipient can be accepted. The collateral contact must be able to give accurate third party information. The reasons for using a collateral contact must be documented in case comments.

A collateral contact can be used only when the recipient indicates difficulty in obtaining documentation, when the applicant/recipient selects a collateral contact as the source of verification, and:

- i. ISD cannot verify using a trusted electronic source;
  - ii. The applicant/recipient indicates difficulty in obtaining acceptable documentary evidence; or
  - iii. The documentary evidence provided by the applicant/recipient is inadequate or questionable.
- d. Recipient Sworn Statement of Identity (EBT 005): As a last resort, in accordance with 7 CFR 273.2(f)(1), the Recipient Sworn Statement of Identity, EBT 005, can be used to verify identity when verification cannot be obtained through any other means. The EBT 005 is considered a document which reasonably establishes the customer's identity because it requires the customer's date of birth, name and signature. The caseworker will compare signatures from the affidavit with signatures on documents in the recipient's ECF. The Sworn Statement is a last resort and should also be filed in the OTC log book.

The worker must document how identity was verified acknowledging that the hierarchy of verification was followed in the determination of an acceptable type of verification. ASPEN comments should indicate what steps were taken to use all other acceptable types of ID verification prior to allowing utilization of the Sworn Statement. Once identity is verified, the following process must be followed to approve an OTC EBT card.

### 3. OTC EBT card issuance process.

If any of the following circumstances occur, the customer should automatically be offered an OTC EBT card. This includes, but is not limited to:

- The customer qualifies for expedite SNAP benefits and does not have an EBT card.
- An EBT card was ordered to be delivered by mail but was not received.
- Other circumstances that may require an OTC EBT card, may include, but are not limited to, the individual is:
  - Age 60 or older;

- Disabled;
- Residing in a rural area;
- Homeless;
- A victim of domestic violence;
- A victim of crime; or
- Other hardship situations authorized by the County Director, Officer in Charge, or Line Manager.

a. The OTC EBT card authorized field office personnel will:

- Enter case comments in ASPEN regarding the EBT OTC approval and how the identity of the customer was verified.
- Fill out the OTC template with the following information:  
(OTC Template.xls is available on the forms drive:\\disfasv025\ISDForms and is encrypted with the standard ISD password)
  - Recipient's name (case head of household);
    - If an AR is picking up the card, enter head of households name followed by a slash ( \ or / ) and the AR's name
  - ASPEN case number;
  - ASPEN individual number (for head of household);
  - The OTC card number; and
  - Reason for the OTC EBT Card
- Send the completed OTC template via email to HSD-OTC-Requests, as an attachment. Due to OTC card volume increase, please email OTC card activation requests no later than 4:45 pm.
- Send a copy of the OTC EBT card if the customer is deemed eligible for SNAP expedite and is not known to the FIS system. If customer is not known to the FIS system, the OTC EBT card cannot be activated until the next business day.
- Provide the customer with the "New Mexico Electronic Benefits (EBT) Card" brochure.
- Advise the customer that only one EBT card can be active at a time and all other cards will be deactivated.
- Provide the customer with their Alternative Access number (found in ASPEN) if they do not have a Social Security number (this is what they will use to pin their EBT card).
- Maintain the OTC EBT Card Issuance Log; customer must sign the issuance log.
- Issue the OTC EBT card to the customer. Never give out an EBT card number verbally.
  - Do not release the OTC EBT card to the customer until activation has been confirmed, *unless* the customer is approved expedite SNAP benefits and the OTC EBT card cannot be activated until the following business day. Confirmation from the EBT Unit that they have received the OTC card copy needed to activate the card the following day must be received prior to providing the card to the recipient

- For new approvals, inform eligible customers when their benefits will be available.
- Instruct the customer to contact FIS Customer Service at 1-800-843-8303 to create a Personal Identification Number (PIN), if necessary. If a pin number is already established, it will transfer to all replacement cards to include OTC's.

b. The EBT Unit will:

- Activate the OTC EBT card using the OTC template that was sent via email from the field office.
- Advise the county office of any information that is pertinent to the case and when the card is or will be activated.
- Enter case comments in ASPEN once the OTC has been activated.

A customer can always request an EBT card by calling FIS at 1-800-843-8303 or through the EBTEdge.com website. The EBT card will be issued by mail the following business day.

If you have any questions regarding this GI please contact EBT Staff Manager Janeé Casaus by email at [janeecasaus@state.nm.us](mailto:janeecasaus@state.nm.us).

Attachment: OTC Request Log  
GI 18-51 Sign-In Sheet



# OTC Request

Recipient Name: Head of Household	
ASPEN Case #:	
ASPEN Indivd #: Head of Household	
OTC Card #	

Reason for OTC	<input type="checkbox"/> Over the age of 60
	<input type="checkbox"/> Disabled
	<input type="checkbox"/> Resides in a Rural Area
	<input type="checkbox"/> Homeless
	<input type="checkbox"/> Victims of Domestic Violence
	<input type="checkbox"/> Victims of Crimes
	<input type="checkbox"/> Expedited in the last 30 days
	<input type="checkbox"/> Undeliverable
	<input type="checkbox"/> Card was not mailed from Vendor
	<input type="checkbox"/> Other reason (determined by CD, OIC, or LM)

