



West Virginia Office of EBT Banking Services  
**Waiver Request – Excessive Card Letter Mailing During  
Pandemic Remote Work Mandate**

1. **Waiver serial number (if request is extension):**
2. **Type of request:** Initial
3. **Primary regulation citation:** CFR §274.6(b)(6)
4. **Secondary regulation citation, if any:**
5. **State:** West Virginia
6. **Region:** MARO
7. **Regulatory requirements:** The State agency shall monitor all client requests for EBT card replacements and send a notice, upon the fourth request in a 12-month period, alerting the household that their account is being monitored for potential, suspicious activity. If another replacement card is subsequently requested and trafficking is suspected, the State agency shall refer that case to the State's fraud investigation unit.
8. **Proposed alternative procedures:** Due to the COVID-19 pandemic crisis, the Office of EBT Banking Services staff is working remotely without access to printers and state mail service. In order to complete the Four or More Card letters for March, it would require a staff member to report to the office to complete the task during a time when the Governor and the DHHR Secretary have mandated that staff work remotely when at all possible. Since the COVID-19 legislation provides states the opportunity to assist clients by waiving many normal eligibility guidelines, West Virginia proposes to maintain the review and documentation of the excessive card information and compile the normal data to share with our fraud and investigations teams without sending letters to the clients until such time that staff can return to work in our office.
9. **Justification for request:** The Governor of West Virginia and DHHR Secretary have mandated working remotely due to the COVID-19 pandemic. The Four of More card letter process cannot be completed remotely.
10. **Anticipated impact on households and State agency operations:** There is no impact on benefit issuance since replacement cards are not withheld from clients in this process.
11. **Caseload information, including percent, characteristics, and quality control error rate for affected portion:** An average of 150 letters are sent to clients monthly based on the



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criteria of 4 or more cards in a rolling 12-month period.

- 12. Anticipated implementation date and time period for which waiver is needed:** The normal procedure is to send the excessive card letters by the 5<sup>th</sup> of each month. This request is to waive the March letters and to waive sending letters for any additional months while there are work restrictions based on the pandemic. When staff can return to the office, letters can be printed and mailed using the normal process.
- 13. Proposed quality control review procedures:** The Office of EBT will continue the normal process of analyzing excessive card replacement to determine the clients who are in the group for excessive cards in a 12-month rolling period and provide that information to partners in fraud and investigations. Based on when the remote work mandate is cancelled, EBT will send letters as appropriate.
- 14. Signature and title of requesting official:** Jacquelyn P. Hoppe, Director of EBT Banking Services, West Virginia Department of Health and Human Resources, Secretary's Office of Central Finance

- 15. Date of request:** 1 April 2020