



U.S. Department of Agriculture
Office of Inspector General
Northeast Region
Audit Report

ELECTRONIC BENEFITS
TRANSFER SYSTEM
DISTRICT OF COLUMBIA



Audit Report No.
27099-13-Hy
JUNE 2001



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Northeast Region

Suite 2-2230

5601 Sunnyside Avenue, Stop 5300

Beltsville, Maryland 20705-5300



DATE: June 19, 2001

REPLY TO

ATTN OF: 27099-13-Hy

SUBJECT: Electronic Benefits Transfer System – District of Columbia

TO: Christopher Martin
Regional Administrator
Mid-Atlantic Region
Food and Nutrition Service

This report presents the results of the subject audit. The Food and Nutrition Service's (FNS) June 6, 2001, and the District of Columbia's, May 31, 2001, responses to the official draft report are included as Exhibit A. Excerpts from the responses and the Office of Inspector General's (OIG) position are incorporated into the Findings and Recommendations section of the report.

We concur with the agency's management decision for Recommendation Nos. 2 and 3. We do not agree with FNS' management decision for Recommendation No. 1 and request additional action as outlined in the OIG Position.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective actions taken or planned and the timeframe for implementing the corrective actions on the recommendation for which management decision has not yet been reached. Please note that the regulation requires a management decision to be reached on all findings and recommendations within a maximum of 6 months from report issuance. Follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the cooperation and assistance provided the OIG staff during the audit.

/s/

MARLANE T. EVANS
Regional Inspector General
for Audit

EXECUTIVE SUMMARY

ELECTRONIC BENEFITS TRANSFER SYSTEM DISTRICT OF COLUMBIA AUDIT REPORT NO. 27099-13-HY

RESULTS IN BRIEF

Beginning in the mid-1980s States began delivering Food Stamp Program (FSP) benefits via electronic benefits transfer (EBT) systems.

The District of Columbia began EBT implementation in June 1998. We evaluated whether the Food and Nutrition Service (FNS) Mid-Atlantic Regional Office's (MARO) oversight of the District of Columbia's EBT system operations was adequate. We identified the District of Columbia's established controls for critical operations, assessed the adequacy of administration and oversight, and determined compliance with applicable laws and regulations.

Overall, we found that FNS MARO's oversight of the District of Columbia's EBT system and operations was adequate. MARO's oversight included providing technical assistance especially during EBT system rollout and acting as the focal point for resolving questions. The District of Columbia had sufficient controls and procedures in place to ensure that FSP benefits were available to recipients in a timely manner, recipients were properly trained in the use of benefit cards, benefit cards in inventory were properly controlled, transactions were accurately processed, and retailer payments were made in a timely and accurate manner. Additionally, District of Columbia Office of Finance officials performed adequate reconciliations of FSP issuance and payment data, ensured EBT management reports were properly utilized, and help desk operations operated effectively. However, controls over access to the EBT system needed strengthening. The District of Columbia did not always ensure terminated employees' access to the EBT system was timely removed or that system access was adequately reviewed for continued need or duplicate user identification numbers (IDs). As a result, unauthorized individuals could access the EBT system and modify or destroy sensitive financial and program information. We identified 33 invalid user IDs in the EBT system however; we did not identify any unauthorized access.

KEY RECOMMENDATIONS

We recommend that the District of Columbia implement procedures ensuring EBT system access is removed upon termination of employment and EBT system access is reviewed for continuing need. We also recommend deleting the 33 identified invalid user IDs.

AGENCY RESPONSE

FNS and District of Columbia officials agreed with the audit recommendations. The District stated they would implement procedures for monitoring and reviewing user access to the EBT system. They also stated that they had removed 26 invalid user IDs. The 7 other identified user IDs are for employees at the Department of Human Services, Office of Investigations and Compliance who have a need and will continue to have access to the EBT system after they receive appropriate security training.

OIG POSITION

We generally agreed with FNS' and District of Columbia's planned corrective actions. However, the proposed security procedures do not address removal of system access upon termination of employment, a necessary component of a secure EBT system.

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INTRODUCTION

BACKGROUND

The Food and Nutrition Service (FNS), an agency of the U.S. Department of Agriculture, administers the Food Stamp Program (FSP).

The FSP assists low-income households by increasing their ability to purchase food. FNS administers the FSP through a Federal-State partnership. The Federal Government pays the full cost of recipient benefits and shares the cost to administer the FSP with the States.

State agencies (SA) are required¹ to certify households for participation in the FSP. Eligible households receive an allotment of benefits, on a monthly basis, based on the number of individuals in the family, household income, and other related factors. SAs are required to keep records to support household eligibility and monthly allotment. Households use program benefits to pay for food items at authorized food retailers.

A certified public accounting (CPA) firm performed a single audit of the District of Columbia's Department of Human Services (DHS) for fiscal years 1994, 1995, and 1996. DHS is the SA responsible for the administration of the FSP in the District of Columbia. As a part of this audit, the CPA firm staff tested compliance with certain provisions of the Food Stamp Act, as outlined in the Office of Management and Budget Single Audit Compliance Supplement, dated 1990. The report disclosed that there is limited assurance that program recipients were eligible to receive FSP benefits or that the amount of FSP benefits received by program recipients was appropriate. This occurred because at least 10 percent of selected case files could not be located and/or were missing necessary eligibility forms to support eligibility determinations. As a result, ineligible recipients may have received FSP benefits or eligible recipients may not have received the correct benefit amount. Program eligibility determination is the first step in ensuring that FSP benefits posted on recipient EBT cards are proper. In the audit report, the CPA firm recommended that DHS strengthen its internal controls over record keeping to ensure that required supporting documentation is maintained. FNS reported, in the management decision process, that DHS had established additional supervisory and managerial controls related to proper case file documentation.

In the past, the basic method of FSP benefit delivery was the food stamp coupon. The Food Stamp Act of 1977 as amended, Public Law 88-525, authorized FNS to experiment with alternative methods for the delivery of

¹ Title 7 Code of Federal Regulations (CFR) §274.1, effective February 15, 1989.

FSP benefits using electronic data processing. As an innovation of the mid-1980s, electronic benefits transfer (EBT) was developed to replace paper coupons with an electronic system. EBT systems are a computerized version of the food benefits delivery process. Using plastic cards, much like debit cards, recipients gain access to benefits through point-of-sale (POS) terminals located at approved food retailers.

The Personal Responsibility and Work Opportunity Reconciliation Act, P.L. 104-193, required that States implement an EBT system before October 1, 2002. As of January 2001, 41 States and the District of Columbia have operational food stamp EBT systems. In fiscal year (FY) 2000 FSP benefits were almost \$15 billion, with more than \$11 billion in benefits issued via EBT. The District of Columbia issued almost \$77 million in FSP benefits via EBT to approximately 36,000 households in FY 2000.

FNS established approval rules for the delivery of food stamps using EBT systems in Title 7 Code of Federal Regulations (CFR), §274.12 and in Title 7 CFR §277.18, for approving automated data processing (ADP) systems. The regulations specify functional areas to be addressed by SAs but do not establish a standardized system of internal controls. FNS' policy is to allow the States the flexibility to establish control systems that meet each State's individual needs. Generally, States award contracts to private sector companies to develop and operate their EBT systems. These companies are usually organizations that already handle electronic funds transfer activities. However, the States remain financially liable to the Federal Government for the actions of their EBT processors.

Each day, EBT processors transmit the total amount of State benefit issuance to the Account Management Agent (AMA) system where the benefit amounts are accumulated. The AMA system provides the approved State benefit issuance information to the Automated Standard Application for Payments (ASAP) system, a centralized system for the request and delivery of Federal funds developed by the U.S. Department of the Treasury. FNS implemented the AMA system to improve its monitoring and management of FSP funds paid via EBT. The EBT processor can draw Federal funds up to the cumulative amount of approved benefit issuance in the ASAP system. EBT processors enter their payment requests into the ASAP system and if a sufficient balance exists, the EBT processor can draw down funds.

The District of Columbia began EBT implementation in June 1998. The DHS was responsible for designing, developing and implementing a citywide EBT system. In accordance with this responsibility, DHS selected Lockheed Martin IMS as the primary contractor to implement the District of Columbia's EBT system, and Citibank as the subcontractor to perform the EBT processing. Lockheed Martin IMS, the prime contractor, is also directly

responsible for conducting training and preparing training materials; installing and maintaining POS terminals; maintaining copies of manual transactions; acting as an intermediary for solving retailer problems; reviewing and following up on selected management reports (i.e., exceeded personal identification number (PIN) attempts reports, card replacement detail reports, ATM fee reports, etc.); and ensuring contract provisions are being met by the EBT processor and third-party processors.

In addition to certifying households for the FSP, DHS is responsible for oversight of group living arrangements and conversion of EBT benefits to cash. The Office of Finance and Treasury (OFT) manages the EBT project in the District of Columbia. The OFT oversees the day-to-day operations and coordinates banking arrangements; coordinates EBT implementation at retailers and other users; handles fiscal issues and retailer and client relations; and is responsible for security of the EBT system. The OFT also reconciles FSP issuance and payments, deals with the EBT prime contractor and processor, as well as oversees help desk operations operated by Lockheed Martin IMS. OFT staff review and follow up on select management reports, which include help desk activity reports, settlement draw down reports, and State issuer reports.

OBJECTIVES

The primary objective of our review was to evaluate the adequacy of the District of Columbia's EBT internal controls and assess whether controls functioned as designed.

Specifically, we (1) Identified internal controls established in key operational areas, (2) included tests to ensure controls were in place and operated as designed, and (3) provided an assessment of the adequacy of prescribed controls. We also determined whether the FNS regional office's oversight was adequate.

SCOPE

The audit was conducted in accordance with generally accepted Government auditing standards. The audit was conducted at the FNS Mid-Atlantic Regional Office (MARO) in

Robbinsville, New Jersey; the District of Columbia's OFT and DHS; two EBT card issuance and training sites; three FSP approved retailers; and Lockheed Martin, IMS, District of Columbia. The retailers reviewed were selected based on high numbers or values of manual transactions. We conducted our fieldwork from July 1999 through January 2001.

We evaluated MARO's oversight of the District of Columbia's EBT system and the SA's administration and management of the EBT system for the FSP. We specifically evaluated and tested the internal controls in the following key operational areas: training; EBT cards and PINs; returned EBT

cards; help desk operations; EBT and third-party processor contract provisions; use of POS terminals; fee structure; EBT system access; reconciliation of FSP benefit issuance and redemptions; use of manual transactions; reconciliations between SA, EBT processor, and Federal information systems data; use of management reports; out-of-State transactions; expungment of FSP benefits; and the use of EBT benefits in group living arrangements.

METHODOLOGY

To accomplish our audit objectives, we reviewed applicable laws and regulations, FSP policies and procedures, and pertinent correspondence at FNS MARO and the District of Columbia. We interviewed responsible OFT, DHS, Lockheed Martin IMS, and MARO officials. We reviewed contractual arrangements between Lockheed Martin IMS, DHS, and third-party processors. We assessed the adequacy of procedures, in part, by performing analysis of system access reports, out-of-State transaction reports, help desk activity reports, and manual transaction reports to identify trends, potential fraud, and questionable activity.

FINDINGS AND RECOMMENDATIONS

CHAPTER 1	ACCESS CONTROLS OVER THE EBT SYSTEM NEED STRENGTHENING
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FINDING NO. 1

Internal controls can be improved for EBT system access. The SA has not implemented adequate procedures to ensure terminated employees' access was timely removed,

duplicate user IDs were deleted, and continued need for EBT system access was reviewed. As a result, unauthorized individuals could access the EBT system and modify or destroy sensitive financial and program information. We identified 33 invalid user IDs in the EBT system however; we did not identify any unauthorized access.

FSP regulations² state that the SA is responsible for protecting equipment used in food stamp data processing systems from unauthorized use. Regulations also require that the SA establish appropriate procedures to protect FSP data and equipment from theft and unauthorized use.

We reviewed SA procedures for authorizing access to the EBT system and determined that adequate procedures have been established for authorizing initial access to the EBT system. Additionally, adequate separation of duties exists for the submission, authorization and establishment of user IDs and passwords.

Access to the EBT system is gained through the Automated Client Eligibility Determination System (ACEDS), the SA's FSP eligibility system. Separate user IDs are required for ACEDS and the EBT system. The procedures for requesting system access have been established and documented in the SA's Capital Access Administrative Manual. In order to obtain access to the EBT system an individual must first have access to ACEDS and then complete a user ID request form, for access to the EBT system. A SA service center (site where program eligibility is determined) manager or the ACEDS security administrator approves this form. After the form has been approved it is faxed to Citibank, the EBT system processor, who then generates the user's login ID.

² Title 7 CFR, §277.18 (p)(2)(ii)(B), effective June 28, 1996.

The ACEDS security manual, dated March 1992, requires the service center manager to notify ACEDS when an employee changes positions, location, or leaves the agency. The ACEDS security officer then notifies the EBT project manager, who subsequently notifies Citibank. In addition, the ACEDS security manager also indicated that an annual review of ACEDS user IDs is performed to identify and delete non-user IDs, including notifying the EBT project manager. The latter review procedure was not documented in the ACEDS security manual.

The notification process noted above was not always adhered to. In some instances the ACEDS security manager was not notified of employee position or location changes or departures. In other instances Citibank created a new user profile and ID rather than correcting an existing profile. This occurred because the SA did not always properly complete the user ID request form due to misunderstandings about what should be included on the form. In addition, the EBT project manager was not always notified of deletions or changes to the EBT system based on the ACEDS security manager's annual review.

The SA's EBT project comprehensive security and control plan, dated March 1998, states that internal system reports will be generated to monitor system access. These reports will allow monitoring of terminal usage, specific activities, and password violations regarding the system.

In the SA there are approximately 190 EBT system user IDs. Periodically, the SA receives a listing of authorized users to the EBT system from Citibank, as required by the contract. However, the SA does not receive a listing from Citibank of authorized users' last access in order to monitor continued need for access to the EBT system. Prior to audit fieldwork the SA had not monitored continued need for access or for duplicate user IDs in the EBT system.

Our review of EBT system user IDs identified a total of 33 invalid user IDs: 20 individuals who were no longer ACEDS users, 6 individuals who had duplicate user IDs, 1 individual with three user IDs, 2 individuals who transferred to another agency, 2 individuals who had retired, and 1 individual who was deceased. The SA security administrator reviewed and confirmed our results. According to SA officials the duplicate user IDs exist because there were misunderstandings about how the user ID request form should be completed. That is, instead of checking the box to indicate a change in someone's user profile, the box to add a new user was checked. Subsequently, the SA obtained clarification from Citibank on how to complete the user ID request form.

The SA has adequate procedures in place for authorizing initial EBT system access. However, controls need to be established for ensuring terminated employees' access is removed and reviewing for continued need for EBT system access or duplicate IDs.

RECOMMENDATION NO. 1

Implement controls to ensure employees' EBT system access is removed upon termination of employment.

FNS Response

The District will implement procedures for monitoring and reviewing user access to the EBT system. These procedures will be implemented by July 2, 2001.

OIG Position

The proposed procedures do not address implementing a process to remove system access upon termination of employment. In order to reach management decision, the District of Columbia needs to implement applicable controls, including the timeframe for implementation.

RECOMMENDATION NO. 2

Document and implement procedures for monitoring and reviewing continued need for access to the EBT system.

FNS Response

The District will implement procedures for monitoring and reviewing user access to the EBT system. These procedures will be implemented by July 2, 2001.

OIG Position

We concur FNS' proposed management decision.

RECOMMENDATION NO. 3

Delete the 33 invalid user IDs from the EBT system.

FNS Response

The District reported they had removed 26 invalid user IDs. The remaining 7 user IDs were identified as belonging to Department of Human Services, Office of Investigations and Compliance employees. These 7 employees have a need and will continue to have access to the EBT system after they receive appropriate security training.

OIG Position

We concur with FNS' proposed management decision.

GENERAL COMMENTS

There are limited controls to ensure that eligible recipients, residing in drug/alcohol treatment centers and disabled/blind group living arrangements are receiving food stamp benefits, the appropriate amount of benefits are returned to recipients when they leave the facility, and authorized representatives are using the FSP benefits for eligible food purchases. This occurred because the SA has not implemented adequate procedures to monitor the participation of these facilities. As a result, there is reduced assurance that FSP benefits are being used for authorized purposes and that the appropriate security has been implemented for the handling of EBT cards, PIN's, and POS equipment.

The SA has only one authorized drug/alcohol center approved by FNS to have a POS terminal and function as an authorized FSP retailer. The center provides six months of residential substance abuse treatment services to homeless and low-income, addicted men and women. The center is run by donations, and requires each client entering the program to apply for food stamp benefits. The FSP provides, approximately \$3,000 to \$5,000 per month, in funds for the center to buy food for the residents.

The DHS has not established any formal procedures for the management of FSP recipients at these facilities and they have performed limited oversight of the approved center to ensure compliance with FSP regulations. A DHS supervisor contacts the center, by telephone, on a periodic basis to obtain a listing of residents. Neither the DHS supervisor nor anyone else from DHS or OFT have made any on-site visits to ensure the center is using the FSP benefits for authorized purposes, benefits are properly authorized, the proper amount of benefits are returned to residents who leave the center, and the appropriate security is in place for the handling of EBT cards, PIN's, and POS equipment.

Based on discussion with the center's program director and a review of available records we noted the following information is maintained by the center: a listing of recipients, including the dates they entered and departed the program; the amount of benefits the recipient is eligible to receive; documentation of recipient responsibilities, which include the requirement that they apply for FSP benefits; receipts for food purchases; and procedures for returning eligible benefits to recipients when they leave the center.

FSP regulations³ require that drug/alcohol treatment and rehabilitation centers and disabled/blind group living arrangements authorized by FNS as a retailer shall provide the SA with a list of residents currently participating in the FSP. The list should be submitted either on a monthly or semi-monthly basis. In addition, the SA is required to conduct periodic random on-site visits to the facility to ensure the accuracy of the list and that residents who leave the center were provided with FSP benefits remaining on their EBT card.

Because there is only one drug/alcohol treatment center, authorized by FNS to operate in the District of Columbia, we are not making any recommendations. However, we suggest that procedures be developed and implemented to ensure that this center and all future drug/alcohol and rehabilitation centers and disabled/blind group living arrangements, designated by FNS as authorized retailers, are in compliance with FSP regulations.

In their response to the audit report, the District of Columbia stated they plan to develop policies and procedures to ensure that the identified center and all future rehabilitation and disabled/blind group living arrangements, designated by FNS as authorized retailers, are in compliance with FSP regulations.

³ Title 7 CFR §273.11(e) and Title 7 CFR §273.11 (f) dated October 17, 1978

EXHIBIT A – FNS REGIONAL OFFICE RESPONSE TO DRAFT REPORT

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United States
Department of
Agriculture

Food and Consumer
Service

Mid-Atlantic Region

Mercer Corporate Park
300 Corporate Boulevard
Robbinsville, N.J. 08691-1598



Date:

Reply to Attention of:

Subject:

Audit No. 27099-13-Hy; Electronic Benefits Transfer
(EBT) System District of Columbia

To:

Marlane T. Evans
Regional Inspector General for Audit
USDA OIG NER

This is in response to your memo dated May 7, 2001, which elevated the discussion draft report to an official draft. The only finding from the subject audit was that the internal controls for EBT system access can be improved. The audit had identified 33 invalid user IDs.

Attached is the District's corrective action plan to address the finding. The District will implement enhanced procedures for monitoring and reviewing user access to the EBT system. It is not stated in the District's correspondence, but they have advised us that the new procedures will be implemented July 2, 2001.

The following actions have been taken on the 33 invalid user IDs: 22 users were removed; 7 users were identified as OIC investigators, that need ACEDS training; and 4 user IDs were deleted. The 7 user IDs that need training will be instructed to schedule training with the ACEDS Helpdesk. After receiving training the ACEDS Security Monitor will inform the EBT Security Monitor to reset those passwords.

We believe that the management decision and final action requirements for this finding have been met. We request your concurrence with this finding.

A handwritten signature in black ink, appearing to read "Joseph Weingart".
JOSEPH WEINGART
Regional Director
Food Stamp Program

Attachment



The Food and Consumer Service, formerly the Food and Nutrition Service

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Chief Financial Officer

Office of Finance and Treasury



May 31, 2001

Joseph Weingart
Regional Director
Food Stamp Program
USDA-Food & Nutrition Service
300 Corporate Blvd.
Robbinsville, NJ 08691-1598

Dear Mr. Weingart:

From the period of July 1999 through January 2001 USDA OIG completed an audit of the District of Columbia's EBT system, Audit No. 27099-13-Hy. The only finding from that audit was that the internal controls can be improved for EBT system access. The audit had identified 33 invalid user IDs.

As a result of the audit, the District will enhance its procedures for monitoring and reviewing user access to the EBT system. In regard to the 33 invalid user IDs the following actions have been taken. A list of user IDs established for the District's EBT system, which was provided by Citibank, was compared to the audit list of user IDs. After comparing the lists 22 users were removed; 7 users were identified as OIC investigators, that need ACEDS training; and 4 user IDs were deleted. The 7 user IDs that need training will be instructed to schedule training with the ACEDS Helpdesk. After receiving training the ACEDS Security Monitor will inform the EBT Security Monitor to reset those passwords.

Also, the audit identified a general comment that no recommendations are being made regarding the review of the one FNS authorized drug/alcohol treatment center. We are currently developing policies and procedures to ensure that this center and all future rehabilitation centers and disabled/blind group living arrangements, designated by FNS as authorized retailers are in compliance by FSP regulations.

If you have any questions or comments, please call me (202) 727-6242

Edward L. Williams
EBT Program Manager

441 4th Street, N.W., Suite 360N, Washington, D.C. 20001 202/727-6055

EBT Administrative Terminal Security Procedures

The purpose of this procedure is for the security monitor to manage all users who have access to the Citibank Boss System. To access the Citibank Boss System, users will need to go through the ACEDS (Automated Client Eligibility Determination System).

EBT Security Monitor:

The role of the EBT Security Monitor is to provide access to the EBT system. Provide training on how to sign on and how to use the EBT system. He is responsible for calling Citibank Information Security to reset any EBT user password. Also call Citibank Information Security to get a list of current users and verify if the users are still district employees. A quarterly audit will be done to check who has been accessing the EBT system. Responsible for processing all EBT requests forms

Center Manager Responsibilities:

The role of the center manager is to assist the EBT security monitor in who has access to the EBT system. The center manager can put in a request for those who need access to the EBT system. Only section chief, unit manager or supervisor can request for access to the EBT system. Also report any employees leaving or moving from an agency to another who has access to the EBT system. Also inform the ACEDS and the EBT security monitor.

ACEDS Security Monitor Responsibilities:

The role of the ACEDS Security Monitor is to verify that an individual requesting access to EBT has an ACEDS user-id before an EBT application can be processed. If a new user is requesting training on ACEDS and need EBT access, contact EBT security monitor.

Citibank Information Security:

The role of Citibank Information Security is to open and create user ids. They also are responsible for resetting expired passwords. After a new user id has been created they will send an email with the new user id to the EBT Security Monitor.

Expired Password:

All users with expired password must contact the EBT Security Monitor. The EBT Security Monitor will call Citibank Information Security to reset the user's password.

- Password will expire in 30 days
- Password will become frozen in 60 days

Contact list:

- []
- []
- []

ABBREVIATIONS

ACEDS	
Automated Client Eligibility Determination System	5
ADP	
Automated Data Processing	2
AMA	
Account Management Agent	2
ASAP	
Automated Standard Application for Payments	2
CFR	
Code of Federal Regulations	2
CPA	
Certified Public Accounting	1
DHS	
Department of Human Services	1
EBT	
Electronic Benefits Transfer	i
FNS	
Food and Nutrition Service	i
FSP	
Food Stamp Program	i
FY	
Fiscal Year	2
ID	
Identification Number	i
MARO	
Mid-Atlantic Regional Office	i
OFT	
Office of Finance and Treasury	3

PIN	
Personal Identification Number	3
POS	
Point-of-Sale	2
SA	
State Agency	1