TO: Commissioners of Social Services

DATE: January 25, 1996

SUBJECT: The Automated Finger Imaging System (AFIS) for Public Assistance

SUGGESTED DISTRIBUTION:
- Directors of Income Maintenance
- Investigation Staff
- Fair Hearing Staff
- Staff Development Coordinators

CONTACT PERSON:
- Call 1-800-343-8859
- Public Assistance: Mark Schaffer, ext. 4-9348 (userid AV1160)
- Food Stamps: District Representative, ext. 4-9225
- Case Integrity Unit: Joe Hazard 1-518-432-8216 (userid 90B162)
- Legal Affairs: Ralph Camardo, ext. 4-5790 (userid AX2620)
- Health and Long Term Care: Sharon Burgess, ext. 3-5531 (userid DMA026)
- Local Financial Operations:
  - Region 1-4: Roland Levine, ext. 4-7549 (userid FMS001)
  - Region 5: Marvin Gold (212) 383-1733 (userid OFM270)

ATTACHMENTS:
- Attachment I: Sample Call-in Letter (available on-line)
- Attachment II: Client Notice of Finger Imaging Law (available on-line)
- Attachment III: Client Notice Language (available on-line)

FILING REFERENCES

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<thead>
<tr>
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<tbody>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>82 ADM-5</td>
<td></td>
<td>351.2(a)</td>
<td>134-a</td>
<td>PASB:</td>
<td>GIS:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>357</td>
<td>139-a(3)</td>
<td>IX-B-6</td>
<td>95 ES/DC035</td>
</tr>
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<td></td>
<td>358</td>
<td>145-c</td>
<td>through</td>
<td>95 LCM-88</td>
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<td>VIII-D</td>
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DSS-296EL (REV. 9/89)
I. PURPOSE

The purpose of this directive is to inform social services districts (local districts) of the requirements of the Automated Finger Imaging System (AFIS) for Home Relief (HR) and Aid to Dependent Children (ADC). AFIS enrollment is a condition of eligibility for HR and ADC adult or head of household applicants and recipients. This directive will address the operational requirements of finger imaging, the restrictions to which districts must adhere, the impact of finger imaging on eligibility and the AFIS requirements for the food stamp (FS) portion of a HR or ADC case.

II. BACKGROUND

Before Chapter 83 of the Laws of 1995, finger imaging was required for HR applicants and recipients in certain districts on a demonstration basis. Also, districts that wished to conduct finger imaging could voluntarily participate in AFIS. Department regulation 18 NYCRR Part 384 set forth the requirements for those local districts that would be participating in AFIS. Chapter 83 of the Laws of 1995 made finger imaging an eligibility requirement statewide and also included ADC applicants and recipients. Lastly, a recent amendment to 18 NYCRR Part 351.2(a) establishes AFIS requirements for food stamp applicants and recipients applying for or receiving public assistance. General Information System (GIS) message 95 ES/DC035 outlined AFIS policy for HR/FS households.

III. PROGRAM IMPLICATIONS

18 NYCRR Part 351.2(a) authorizes districts to require that PA applicants and recipients establish their identities by means of finger images as a condition of eligibility. This would apply to such programs as ADC, ADC-U, HR, PG-ADC, CAP and TEAP. All adults (individuals 18 years of age and older) and heads of households must be enrolled in AFIS.

Districts are required to finger image HR and ADC applicants as part of the application process. Current recipients can either be sent call-in letters (Attachment I) or approved local form, requesting that they come to the local district at an appointed time to be finger imaged or this can occur as part of the regular recertification process. Since finger imaging will be used to verify identity as a condition of eligibility, applicants who decline to be finger imaged will be denied and recipients who decline to be finger imaged will lose their eligibility for assistance. When an applicant or recipient fails to be finger imaged, the entire case is ineligible.
Finger imaging will prevent recipients from establishing more than one case within their home district or statewide and will establish positive identity for each client.

IV. REQUIRED ACTION

A. AFIS Loading of Initial Client Records

1. Applicants

The Welfare Management System (WMS) Application Registry Number (ARN) will be required to be entered into the AFIS enrollment screen. (Note: Duplicate ARNs will not be allowed on AFIS.) Therefore, finger imaging of applicants must take place at the time the application is registered onto WMS and an ARN is created or afterwards.

AFIS will use WMS to update the ARN with a Client Identification Number (CIN) during a regularly scheduled computer interface. In order to accommodate multi-person cases, AFIS has expanded the ARN to a ten digit number to include line number and county code.

In order to maintain statistical data on the finger imaging of applications, a control log will be required for all applications. Retaining a copy of each Application Turnaround Document (APP TAD) will satisfy the control log requirement if the disposition of the application is noted on the APP TAD. Otherwise, the applicant's name, social security number, date of birth, application registry number or CIN and an application disposition comment section will be required in a control log.

Department regulations require that each PA applicant be notified of the finger image requirement. Local districts have the discretionary authority to decide how and when this notification (Attachment II) or approved local form, will be incorporated into their application procedures. This notice may be distributed within the application packet, at pre-screening or at the eligibility interview. Only adults and heads of households are required to be finger imaged.

A refusal by a PA or PA/FS applicant to be finger imaged is grounds for the denial of assistance and the case must be recorded as a denial on WMS using code M88 upstate. (Instructions for New York City to follow.) This code must be used for both the PA and FS portions of a case if the applicant is also applying for FS. Certain HR and ADC applicants who are denied may be referred to Medical Assistance for a separate determination as outlined in Section IV-I of this Directive.
If one required member of a case refuses to comply with the finger imaging requirement, the entire case is to be denied, because verification of eligibility by means of finger imaging is a condition of eligibility for the household. Any adults not present at application must be enrolled in AFIS within 30 days of application and prior to approval of such application.

With regard to courtesy applications, AFIS will not be able to accommodate them without a valid ARN or CIN. These are necessary to maintain data base integrity of AFIS. Therefore, enrollment into AFIS will be postponed until the financially responsible county provides the host county with an ARN or CIN.

2. Recipients

The regulations mandate that each HR and ADC recipient be notified of the finger image requirement. Recipients will be informed by a notice (Attachment II) or approved local form, that they will be required to fulfill their finger image obligation for HR and ADC. Such notice must be mailed out to all recipients. It may be attached to the AFIS call-in letter described below, which is mailed to recipients.

At the district's option, recipients can be scheduled for finger imaging by using the special AFIS call-in letter (Attachment I) or approved local form, or during the standard recertification process. At the appointment, the client must be properly identified by means other than finger imaging before the enrollment.

A control log based upon the call-in mailing list or the recertification lists must be used to track compliance with the appointment letters. The automated control log for recipients may be used, or districts may use their own log. Districts must be flexible with individuals unable to keep appointments to the same degree as given in any other income maintenance process. Those PA and PA/FS individuals who fail to appear for a scheduled appointment and fail to respond to the subsequent timely and adequate notice must have their cases closed using Code M88 for failure to comply with the finger image requirement. The entire case will be closed if there are other household members in the case. As described in IV-I, MA Applications, certain individuals must be referred for separate MA determinations. All notices, reasons for failure to comply and exemptions are required to be included in the PA case record.
An applicant or recipient who fails to be finger imaged may claim "good cause" for not complying with this requirement. If a district determines that "good cause" exists, then no negative action can be taken.

When an applicant or recipient claims good cause, that person is responsible for furnishing evidence to support that claim. Upon a review of the evidence, the local district will determine whether to accept the claim of good cause. The final determination and the reasons for that determination should be detailed in the case record.

If an applicant or recipient causes a condition to exist on his or her fingers which prevents an acceptable finger image from being taken, the applicant or recipient should be scheduled for another finger image appointment within 48 hours. Such conditions would include application of foreign substances to the finger(s) and any alterations to the natural state of the client's fingers. If the applicant or recipient fails to appear at the rescheduled appointment, or a condition continues to exist on his or her fingers at the time of the rescheduled appointment which prevents acceptable finger images from being taken, the application must be denied or the case closed for failure to comply with the finger image requirement.

B. Procedural Use of AFIS Functions

1. Identity Verification

AFIS is capable of verifying information on an existing recipient AFIS record in approximately one minute. This inquiry is not categorized as an enrollment (add transaction), therefore, there is no per transaction charge associated with identification verification.

The Department recommends that local districts verify the identity of recipients with AFIS whenever possible. Recertification, lost benefit cards or any other on-site, face-to-face situation between the local district and recipient would provide the opportunity to verify currently stored AFIS demographics and the quality of the individual recipient's photograph.
Active or inactive recipients will be subjected to the AFIS verification procedure when they move to a new local district from another jurisdiction and so advise the new district. This procedure must be performed in order to change the county code and/or activate an inactive AFIS case. Changes in county code must be performed within 24 hours of the verification/identification procedure.

2. Records Management

The AFIS does not allow the entry of a record that has a CIN or SSN already in the AFIS database, and in the near future it will not allow duplicate ARN's. If the entry of a duplicate CIN or SSN is attempted, a "duplicate key" error message will appear and enrollment of such record will not be allowed.

Local districts should utilize the records management function to retrieve the record containing the same CIN or SSN from the AFIS database. This will allow for comparison of the AFIS photo with the client attempting enrollment.

As an alternative, local districts may also utilize the Identity Verification function to establish the identity of the client attempting enrollment.

Please note that resolution of a duplicate CIN or SSN is the responsibility of the local district. A match resolution contact list has been provided and should be utilized in resolving cases where a duplication exists.

C. Finger Image Matches

1. Procedure for Client Matches

A denial or case closing due to AFIS may not be imposed unless the results of the automated finger image match have been verified by means of a manual match conducted by a person who is qualified to perform such identification. In order to support this process, a number of units staffed by the contractor will be strategically located throughout the State to provide expert analysis on computer generated matches. These units will be known as Minutia Analysis Units (MAU). When potential matches occur, the finger images will be automatically electronically transferred to one of these units for manual examination by an expert. Local districts will receive feedback from the MAU within minutes. Any required testimony for administrative hearings will be provided by the MAU expert.

When a match occurs at application, an investigation should be started immediately to establish the facts and whether the match is potentially fraudulent. However, in match situations where the applicant has not made an attempt to
change or obscure other identifying information, such as name or date of birth, there is a strong possibility that the individual simply moved from one district to another. For matches that are not as readily explained, investigations must be coordinated with any other district which may be involved before an application is denied or a case is closed. A list of match resolution contacts may be obtained by contacting the Case Integrity Unit (CIU).

Undercare matches identified at recertification or during any call-in project will trigger an investigation on the eligibility of that case and any other matched case(s). The investigation should determine which case must be immediately terminated and whether eligibility may continue. Results or status of investigations are required to be forwarded to CIU within 30 days.

All multiple cases, as well as any apparently continuing eligible case, must be evaluated for Intentional Program Violation (IPV) prosecution and resulting disqualification penalties.

The following are examples of match situations:

Example 1  Client applies in County B but has an active case in County A. County B will deny the application via regular procedures. County A will investigate the case to determine if any action should be taken.

For example, client Ellen Smith has been receiving benefits in County A for the past nine months. She then attempts to establish another case in County B, but when she is finger imaged, County B discovers that Ellen has already established a case in County A. Since she has not recently moved, County B will deny the application and Ellen can request a fair hearing. Alternatively, when the match occurs, Ellen can be offered the opportunity to withdraw her application.

County A, when notified of this second application by County B investigators or by the AFIS system, may investigate but the opened case would not be closed based solely upon the match.

If the client in this example had an open case in the same county, the county would deny the application and would investigate whether to take any action on the open case.
Example 2  Client recertifies in County D but has an active case in County C. County D can close the case if the finger images of the client match those of a person already receiving public assistance or public assistance and food stamps. Additionally, County C can investigate the case for potential IPV or other reason for case closing.

In this example, Sam Jones has been receiving benefits in County C for 14 months and benefits in County D for 8 months concurrently. County C calls Sam in and he is finger imaged, County D has not done finger imaging for him. A week later, County D calls Sam in to be finger imaged, and County D becomes aware that Sam also has established a case in County C. In this instance, the county (County D) which matched him with a client in another district (County C) would initiate the case closing. County C, when notified of the match, can investigate and, if appropriate, close the case for having unreported income under Part 351 of Department Regulations for PA and Part 387 for FS, and/or proceed with an IPV. Because County C may be continuing the grant, County C will also make the recoupment if and for as long as the case remains open. The overpayment amount will equal the amount of the assistance Sam received from County D. (Recoupment is done under 18 NYCRR 352.31(d) for PA and 387.19(a) and (b) for FS.)

If the client in this example had an open case in the same county, the county would close the second open case. The county would then determine what action to take regarding the first open case.

Example 3  ADC and FS family recertifies in County E, but one spouse is active in County F. County E can close the case if the finger images of the client match those of a person already receiving public assistance or public assistance and food stamps. Additionally, County F can investigate the case for potential IPV or other reason for closing.

For example, Diane and Fred, an ADC married couple living in County E, are called in to be finger imaged. It is discovered that Diane is also receiving benefits in County F. The couple's case is closed in County E. County F is notified and can investigate for possible action.
2. Fair Hearings/Notices

Public Assistance:

When a PA application or case is to be denied or discontinued based upon an AFIS match, the local district in which the match is made will send an adequate notice to the recipient. Thereafter, normal fair hearing procedures apply. The other local district with which the recipient has an open case should then take appropriate action, including investigation, closing the case for unreported income, proceeding with an IPV, and/or recoupment of any overpayments.

Districts should continue using current forms and notices for match situations. In the future, the Department will provide local districts with mandated notices for client matches.

Food Stamps:

Food stamp regulations mandate that a timely and adequate notice be sent to food stamp recipients also receiving public assistance whose case is to be discontinued because of multiple fraudulent participation. This is true even in those instances where an adequate notice suffices for discontinuance of the PA portion of a PA/FS case.

When the PA/FS case reason code is M99, the client notice system (CNS) will automatically send timely and adequate closing language for the FS portion of a PA/FS case closing notice. CNS discontinuance notice language will also accommodate those instances where a FS authorization "to" date must extend to the month beyond the PA authorization period "to" date. This generally occurs when the 10-day FS timely and adequate notice requirement will not allow concurrent PA and FS authorization "to" dates.

D. Client Notices

Upstate

Specific client notice language has been developed for AFIS and may be found in Attachment III of this directive. This language or language approved by the Department, is to be used with the appropriate denial or discontinuance notice.

These notices are used in the various circumstances when an applicant or recipient fails to be finger imaged. For Client Notice System (CNS) purposes, the denial/closing code M88-Failure to Comply With Finger Imaging Requirement is to be used for the PA or PA/FS case reason code. For applicant or recipient matches, use the denial/closing code M99-Finger Imaging Match.
New York City

NYC system coding and notice procedures to support the policy will be issued by HRA.

E. Food Stamps

If action is taken to deny or close a PA case due to failure to comply with AFIS requirements, or due to evidence obtained from an AFIS match which establishes multiple participation, the FS portion of such case must also be denied or closed for such reasons.

Finger imaging is not yet an eligibility requirement for NPA/FS or FS-mix applicants or recipients. A PA/FS case denied or closed due to failure to comply with AFIS requirements may apply as an NPA/FS household. However, information obtained from the finger imaging investigation may be used as a basis to deny NPA/FS applicants to prevent multiple participation.

F. Security

1. Security of Records

Provisions of the Personal Privacy Protection Law (PPPL) apply to automated finger imaging records maintained by districts and deems these districts to be state agencies for purposes of the PPPL and automated finger imaging records.

Automated finger imaging data is subject to the confidentiality provisions of 18 NYCRR Part 357. Automated finger imaging data may be disclosed for purposes directly related to the administration of the PA and FS programs including prevention of multiple enrollments in public assistance and public assistance food stamp programs or as evidence in the criminal prosecution of welfare fraud. Finger image data may be used as evidence in Administrative Disqualification Hearings or criminal proceedings pursuant to 18 NYCRR Part 359.

2. Right of Client to Inspect Records

A recipient or applicant has the right to review his or her finger image record.

3. Archiving AFIS Files

The migration of finger image files from active to inactive and ultimately to archived files will be the responsibility of the Department, based on information generated by WMS. Normal WMS data entry will serve to drive this function.
G. Cooperation With Audit and Review

Department regulations require local districts to cooperate in all audits, reviews and evaluation activities, including those conducted by an independent contractor under contract with the Department.

H. Claiming

Expenditures for ADC, ADC-U and PG-ADC recipients will be reimbursed at the level of 50 percent federal, 25 percent state and 25 percent local share.

Expenditures for HR recipients will be reimbursed at the local level of 50 percent state share. Costs should be allocated between ADC and HR based on the number of clients/recipients finger imaged each month.

The expenditures for local district staff working on the finger imaging project will be claimed for reimbursement solely on the DSS-3922. These expenditures and associated overhead costs should be reported in the first instance on the Schedule D-17 Distribution of Allocated Costs to Other Reimbursable Programs (DSS-3274) as F-17 functional costs. These costs should be identified on the Schedule D-17 as "AFIS" expenditures. Local districts, when calculating the reimbursement shares on the Schedule D-17 for HR cases must record only a local share for any A-87 costs and a 50/50 federal/local split for ADC cases. The expenditures reported on the Schedule D-17 will be carried forward to the DSS-3922 for reimbursement.

Claims for reimbursement should be submitted on a monthly basis to the Bureau of Local Financial Operations, New York State Department of Social Services, 40 North Pearl Street, 8th Floor, Albany, New York 12243.

The Department will be paying the selected statewide contractor for this program in the first instance. All districts will be charged back their respective local share of the costs of the contract. The chargeback will be taken on the settlement of the last month of the quarter for the contractor costs paid for the previous three months. For example, on the April, 1996 settlement completed in July 1996 the chargeback will cover the costs for April 1996 through June 1996.

I. Medical Assistance Applications

There are no finger imaging requirements for MA-Only applicants/recipients. The Department is presently exploring the possibility of imposing such a requirement. For individuals that are not in a federal category of assistance (HR) and who have first applied for PA or PA/FS, finger imaging requirements may affect subsequent eligibility for MA-Only.
For single adults and childless couples ages 21 through 64 and not certified disabled whose PA and PA/FS cases are denied or closed due to failure of a household member to cooperate with finger imaging requirements are also ineligible for MA-Only under that application. Such individuals are not eligible for MA-Only during the application month and the following month. Following this period, individuals may apply for and be eligible for MA-Only, if otherwise eligible. Generally, retroactive MA-Only eligibility before that date is not available.

MA-Only is available to federally related individuals closed or denied under Public Assistance for failure to cooperate with finger imaging. Applicants who are ADC, under 21 years old, over 65 years old, pregnant, certified disabled or have applied for SSI must be referred to Medical Assistance for a separate determination as described in 82 ADM-5.

All PA and PA/FS cases (regardless of category) closed due to a finger imaging match with another case are ineligible for MA-Only until issues surrounding the reason for the match are resolved.

V. SYSTEMS IMPLICATIONS

Instructions for New York City will follow under separate cover.

VI. EFFECTIVE DATE

January 31, 1996 retroactive to January 1, 1996.

___________________________________________
Pattricia A. Stevens
Deputy Commissioner
Division of Temporary Assistance
COUNTY DEPARTMENT OF SOCIAL SERVICES

NOTICE

New York State Law and Regulations require that all adults or heads of households who apply for or receive HR or ADC be finger imaged. You must do this to get public assistance. If you do not, you will not be eligible. Finger imaging can only be used for purposes related to your eligibility for HR or ADC, and PA/FS.

You have an appointment on:

Date: _________________________________
Time: _________________________________
Place: _________________________________

You must bring identification with you to this appointment.

If you are unable to keep the appointment, you must call your worker and tell your worker the reason before the date of the appointment. If you have a good reason, you will get another appointment. A good reason includes illness or a job appointment. If you do not contact your worker, your case will be closed. You may be asked to provide written documents to prove that you had a good reason.
NOTICE OF AUTOMATED FINGER IMAGING SYSTEM

This notice is to tell you about the automated finger imaging system requirement for all adults and heads of households that are receiving or applying for public assistance and public assistance food stamps, if applicable.

The automated finger imaging process uses a computer system that electronically takes a fingerprint quickly and easily. The system uses a photo image process, no ink or cards are used. The system will also take a digitized photo at the same time.

Finger images will be stored and matched against those of other clients for Social Services use only. No one will have access to the finger images for any purposes other than those related to your eligibility for public assistance and public assistance food stamps.

Each client will have his/her finger images taken and stored on the automated finger image system as a requirement for receiving public assistance.

This means:

· If you are applying for public assistance, you must be finger imaged before an eligibility determination can be made.

· If you are receiving public assistance, you will be notified when you have to appear at the agency to be finger imaged or you will be finger imaged at your next recertification.

· If you refuse to participate in this mandatory program, your public assistance (and food stamps, if applicable) will be denied or terminated. Your Medical Assistance will also be denied or terminated if you are a single adult or childless couple.

THERE IS NOTHING YOU NEED TO DO AT THE PRESENT TIME. YOU WILL BE NOTIFIED WHEN YOU NEED TO COME TO THE AGENCY TO BE FINGER IMAGED.
1. Single applicant - failure to be finger imaged

PUBLIC ASSISTANCE

Your (date) request for public assistance is not approved.

This is because you, without good cause, did not comply with a requirement that finger images be provided.

All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.

A case is not eligible when any member in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2.

FOOD STAMPS

Your request for food stamps is NOT APPROVED. This is because you, without cause, did not comply with a requirement that finger images be provided.

All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.

When a household is applying for public assistance and food stamps a household is not eligible for food stamps when any adult member or head of household in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2(a).

MEDICAL ASSISTANCE

We have denied your application for Medical Assistance. This is for the same reason as your public assistance was denied.

This decision is based upon Department regulation 360-2.2.

+--------------------------------------------------------------------------+
| WORKER NOTE                                                               |
| The MA language is only applicable to single adults and childless couples  |
| ages 21 through 64 and not certified disabled. A separate MA determination |
| must be done for all applicants and recipients who are ADC, under 21 years |
| old, over 65 years old, pregnant, certified disabled or have applied for SSI. |
+--------------------------------------------------------------------------+
2. **Multi-person application - failure of one or more members to be finger imaged**

**PUBLIC ASSISTANCE**

Your (date) request for public assistance is not approved.

This is because you, and/or another member of your PA household 18 years of age or older, without good cause, did not comply with a requirement that finger images be provided:

> All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images of all heads of households and all members of your PA household that are 18 years of age or older. You, and/or another member did not comply.

A case is not eligible when any member in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2.

**FOOD STAMPS**

Your request for food stamps is NOT APPROVED. This is because the following person(s), without cause, did not comply with a requirement that finger images be provided: [Name(s)]

All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.

When a household is applying for public assistance and food stamps a household is not eligible for food stamps when any adult member or head of household in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2(a).

**MEDICAL ASSISTANCE**

We have denied your application for Medical Assistance. This is for the same reason as your public assistance was denied.

This decision is based upon Department regulation 360-2.2.

+--------------------------------------------------------------------------+
| WORKER NOTE                                                             |
| The MA language is only applicable to single adults and childless couples |
| ages 21 through 64 and not certified disabled. A separate MA determination |
| must be done for all applicants and recipients who are ADC, under 21 years |
| old, over 65 years old, pregnant, certified disabled or have applied for SSI. |
+--------------------------------------------------------------------------+
AFIS Discontinuance Language

3. Single undercare case - failure to be finger imaged

PUBLIC ASSISTANCE

This is to tell you that your public assistance will be DISCONTINUED. You will no longer get public assistance beginning ____________________.

This is because you, without good cause, did not comply with a requirement that finger images be provided.

All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.

A case is not eligible when any member in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2.

FOOD STAMPS

A) TX = 07:

This is to tell you that your food stamps will be DISCONTINUED. You will no longer get food stamps beginning (DATE).

IMPORTANT: If your food stamps are discontinued on or after the 2nd of a month, usually you can still pick up your food stamps for that month.

FOR EXAMPLE, if you usually pick up your food stamps on the 6th of the month and your food stamps are discontinued beginning on the 2nd, you can still pick up your food stamps for that month between the 6th and the last day of the month.

OR

B) TX = 08:

Your application for continued food stamps is NOT APPROVED. You will no longer get food stamps beginning (DATE).

This is because you, without cause, did not comply with a requirement that finger images be provided.

All adults and heads of households must have their finger images taken as a condition of receiving food stamps with their public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.
When a household receives public assistance and food stamps a household is not eligible for food stamps when any adult member or head of household in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2(a).

MEDICAL ASSISTANCE

We have discontinued your Medical Assistance. This is for the same reason as your public assistance was discontinued.

This decision is based upon Department regulation 360-2.2.

+--------------------------------------------------------------------------+
¦                          WORKER NOTE                                    ¦
| The MA language is only applicable to single adults and childless    ¦
| couples ages 21 through 64 and not certified disabled. A separate MA  ¦
| determination must be done for all applicants and recipients who are  ¦
| ADC, under 21 years old, over 65 years old, pregnant, certified        ¦
| disabled or have applied for SSI.                                     ¦
+--------------------------------------------------------------------------+
4. Multi-person undercare case - failure of one or more members to be finger imaged

PUBLIC ASSISTANCE

This is to tell you that your public assistance will be DISCONTINUED. You will no longer get public assistance beginning _________________.

This is because you, and/or another member of your PA household 18 years of age or older, without good cause, did not comply with a requirement that finger images be provided:

All adults and heads of households must have their finger images taken as a condition of receiving public assistance. We told you that this agency had to be allowed to take finger images of all heads of households and all members of your PA household that are 18 years of age or older. You, and/or another member did not comply.

A case is not eligible when any member in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2.

FOOD STAMPS

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This is to tell you that your food stamps will be DISCONTINUED. You will no longer get food stamps beginning (DATE).

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OR

B) TX = 08:

Your application for continued food stamps is NOT APPROVED. You will no longer get food stamps beginning (DATE).

This is because the following person(s), without cause, did not comply with a requirement that finger images be provided: [Name(s)]
All adults and heads of households must have their finger images taken as a condition of receiving food stamps with their public assistance. We told you that this agency had to be allowed to take finger images. You did not comply.

When a household receives public assistance and food stamps a household is not eligible for food stamps when any adult member or head of household in the case refuses to allow finger images to be taken.

This decision is based on Department Regulation 351.2(a).

MEDICAL ASSISTANCE

We have discontinued your Medical Assistance. This is for the same reason as your public assistance was discontinued.

This decision is based upon Department regulation 360-2.2.

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| WORKER NOTE                                                               |
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| The MA language is only applicable to single adults and childless couples  |
| ages 21 through 64 and not certified disabled. A separate MA determination |
| must be done for all applicants and recipients who are ADC, under 21      |
| years old, over 65 years old, pregnant, certified disabled or have        |
| applied for SSI.                                                         |
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