TRANSMITTAL: 96 ADM-7

DIVISION: Services and Community Development

DATE: March 29, 1996

TO: Commissioners of Social Services

SUBJECT: Refugee Cash and Medical Assistance Program (RCA & RMA)

SUGGESTED DISTRIBUTION:

Income Maintenance Directors
Employment Coordinators
WMS Coordinators
Food Stamps Directors
Medical Assistance Directors

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ATTACHMENTS: Refugee Provider List (available on-line)

FILING REFERENCES


81-ADM-32 81-ADM-32 Part 349, SSL 20; 34 83 MB-20
350, 351, 65; (203)
352, 355, 131; 131-a
356, 357, 157; 158
358, 373, 159-a
385. 159-b
349; 350

DSS-296EL (REV. 9/89)
I. Purpose

The purpose of this Administrative Directive is to inform local social services districts of the implementation by the Department of the Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA) Programs as special Federal Programs.

II. Background

Chapter 81 of the Laws of 1995 contains several amendments to the Social Services Law which prompted the establishment of RCA and RMA.

It amended Section 131-a of the Social Services law by adding a new paragraph (d) of Subdivision 3, which precludes any persons from receiving Home Relief (HR) or Aid to Dependent Children (ADC) benefits for the first six months after establishing residency in the state if such person's most recent residence is outside of the United States, its territories or possessions.

This amendment has prompted the Department to issue this directive, which is in accordance with Part 373 of the Department Regulations.

III. Program Implications

In response to this directive, the social services district shall direct eligible refugees and entrants who apply for cash assistance to one of the following cash assistance programs: ADC, HR, SSI, or RCA. This directive addresses RCA only. The other assistance programs administered by the Department are addressed separately in other directives.

IV. Required Actions

RCA and RMA are available to eligible refugees and entrants who have established their residency in New York State and have been residing in the United States for less than eight months after entry to the country. After eight months of residency in the country, they may be considered for other cash assistance programs, such as ADC, HR, or SSI.

In order for the social services district to administer RCA and RMA correctly for refugees and entrants, the information and instructions are provided below.

A. Definitions

For the purpose of this directive, the social services district needs to familiarize itself with the following definitions:
1. "Filing Unit" means the individual or individuals whose needs are considered in determining eligibility for, and the amount of, an assistance payment.

2. "Household" means the individual or individuals living in a housing unit.

3. "Employable" means not exempt from registration for employment services under paragraph 2 of Subdivision K of Section IV of this directive, below.

4. "Family Self-Sufficiency Plan" means a plan that addresses the employment service needs of the employable members in a family to enable the family to become self-supporting through employment of one or more family members.

5. "Individualized Employability Plan" means an individualized written plan as part of the family self-sufficiency plan for a refugee or entrant registered for employment services which are intended to result in the earliest possible employment of the refugee or entrant.

6. "Registrant" means an individual who has registered for employment services under Section IV, Subdivision K, Paragraph 2 of this directive.

7. "Refugee Social Service provider" means a public or private community agency which has entered into a contract with the Department to provide employment services to refugees and entrants.

B. Linkage and Coordination of Refugee/Entrant Resettlement.

1. Goal of Refugee Resettlement

The goal of services to refugees and entrants is to provide for the effective resettlement of refugees and entrants and to assist them to achieve economic self-sufficiency as quickly as possible.

2. Types of Programs for Refugee/Entrant Resettlement

There are several programs for refugees and entrants, as follows:

a. Reception and Placement Services

The voluntary local resettlement agencies, under agreement with the U.S. Department of State, provide Reception and Placement Services to newly arriving refugees and entrants, including basic needs support, employment orientation and referrals during the first 30 days after entry to the U.S., or 120 days after entry to the U.S. if the client is part of the matching grant program (see Sub-paragraph d. of Paragraph 1. of Sub-division F of this Directive, below).
b. Cash Assistance

Cash assistance is provided to eligible refugees and entrants via the RCA, ADC, HR, or SSI programs. RCA, ADC, and HR are offered through social services districts and SSI, through the Social Security Administration.

c. Refugee Social Services

The Department provides Refugee Social Services through contracts with public and private community agencies to assist refugees and entrants in finding jobs and in achieving economic self-sufficiency as quickly as possible.

3. Linkage and Coordination among Different Programs Dealing with Refugees and Entrants

To effectively and efficiently assist refugees and entrants to achieve economic self-sufficiency as quickly as possible, the social services district is required to coordinate some of these programs, as follows:

a. To determine which category of cash assistance program the refugee or entrant applicant is eligible for among RCA, ADC, HR, or SSI.

b. To refer those refugees and entrants who are determined to be employable to the appropriate refugee social service provider in the area for employment services.

C. Application for Cash and Medical Assistance

The social services district must do the following in determining eligibility for cash and/or medical assistance.

1. Offer the opportunity for refugees and entrants to apply for assistance without delay.

a. The application for cash assistance shall be in writing on the Department's form DSS/2921/DSS-2921NYC: APPLICATION FOR: Public Assistance - Medical Assistance - Food Stamps - Services (see Section VI), and include all required and necessary information requested in the form.

b. The application shall be filed by the applicant him/herself, his/her authorized representative, or someone acting responsibly for him/her, and be dated and signed by the applicant or the authorized representative.

c. An application shall be required as a condition of authorization for RCA and RMA, and employment services, as described in Section IV, Subdivision K of this directive.

2. Process cash assistance applications within 30 days from the date the application is filed.
3. Determine eligibility for other cash assistance programs first, such as ADC and SSI, in accordance with Section IV, Subdivision E of this directive.

4. Verify with the applicant's sponsor or the resettlement agency the amount of financial assistance which the sponsor or resettlement agency is actually providing to the applicant and count any assistance, provided in cash, in considering income and resources of applicants under Section IV, Subdivision H of this directive.

5. Determine from the applicant's sponsor or the resettlement agency whether the applicant has refused to accept an offer of employment within 30 consecutive days immediately prior to the date of application, in accordance with Section IV, Subdivision K, Paragraph 4, of this directive.

6. Provide notice to the applicant that assistance has been authorized, clearly indicating that it is for RCA and/or RMA as distinguished from other cash assistance programs such as ADC, HR, and SSI, and that the RCA and/or RMA are limited to the eight month period defined in Section IV, Subdivision J of this directive.

7. Notify promptly the agency which provided for the initial resettlement of a refugee or entrant whenever the refugee or the entrant applies for cash assistance.

D. Determination of Alien Status as a Refugee or an Entrant.

1. Establish that the applicant for cash assistance is a refugee or an entrant by reviewing documentation (I-94 or other acceptable documents) issued by the INS, which must indicate one of the following statuses as a condition of eligibility:

   a. Refugee status

      1) Paroled as a refugee or asylee under section 212 (d) (5) of the Immigration and Nationality Act, hereafter referred to as the Act;

      2) Admitted as a conditional entrant under section 203 (a) (7) of the Act;

      3) Admitted as a refugee under section 207 of the Act;

      4) Granted asylum under section 208 of the Act; or

      5) Admitted for permanent residence, provided that the individual previously held one of the statuses identified in clauses 1) through 4) of this subparagraph.
b. Entrant status

1) Any national of Cuba or Haiti granted parole status as a Cuban/Haitian Entrant (status pending) or granted any other special status subsequently established under the immigration law for nationals of Cuba or Haiti, regardless of the status provided; and

2) Any other national of Cuba or Haiti

   a) Who

      (i) Was paroled into the U.S. and has not acquired any other status under the Act; or
      (ii) Is the subject of exclusion or deportation proceedings under the Act; or
      (iii) Has an application for asylum pending with the INS; and

   b) With respect to whom a final, nonappealable, and legally enforceable order of deportation or exclusion has not been entered.

2. Verify the entry date to the U.S., as indicated on the INS documentation.

Refugees and entrants to be considered for RCA must have established residency in the State and have been residing in the United States for less than eight months after entry to the country.

E. Determination of Eligibility under Other Programs

1. ADC

   a. The social services district must determine eligibility under the ADC program first for refugees or entrants who apply for cash assistance.

   b. The social services district must provide cash assistance under the ADC program to all refugees or entrants who apply for and are eligible under that program.

   c. If the social services district determines that the refugee or entrant applicant is not eligible for cash assistance under the ADC program, it must then determine eligibility for RCA in accordance with Subdivisions F through K of this directive, below.

2. SSI

   a. The social services district must refer refugees or entrants who are 65 years of age or older, or who are blind or disabled, promptly to the Social Security Administration, HHS, to apply for cash assistance under the SSI program.
b. If the social services district determines that a refugee or an entrant who is 65 years of age or older, or blind or disabled, is eligible for RCA, it must furnish such assistance until eligibility for cash assistance under the SSI program is determined, provided that the conditions of eligibility for RCA continue to be met.

3. Emergency Cash Assistance

If the social services district determines that a refugee or an entrant has an urgent need for cash assistance resulting from a sudden occurrence or set of circumstances demanding immediate attention, it should process the application for cash assistance as quickly as possible on an emergency basis, consistent with Federal and State law and regulations.

F. Conditions of Eligibility for RCA and RMA

1. RCA

Eligibility for RCA is limited to those who --

a. Are ineligible for cash assistance under ADC and SSI programs but meet the standard of assistance established under Part 352 of the Department Regulations;

b. Meet immigration status and identification requirements in Subdivision D of this directive, above, or are the dependent children of and part of the same filing unit as individuals who meet the requirements in Subdivision D.

c. Provide the name of the resettlement agency which resettled him/her.

d. May be eligible for RCA only during the eight month period beginning with the first month the refugee or entrant entered the U.S. However, an applicant is not eligible for RCA for any period in which the applicant is receiving a Reception and Placement Grant for the first 30 days after entry, or Matching Grant for the first 120 days, from a refugee resettlement agency.

e. Meet the requirements of employment services, job interviews, and employment, as set forth in Subdivision K of this directive; and

f. Are not full-time students in institutions of higher education, except where such enrollment is expected to be approved as part of an individualized employability plan.

2. RMA

a. Eligibility for RMA is limited to those refugees and entrants who:
1) are ineligible for medical assistance, but meet the financial eligibility standards for medical assistance under Subpart 360-4 of the Department Regulations;
2) meet immigration status and identification requirements set forth in Subdivision D of this directive, or are the dependent children of a parent or parents who meet the immigration status requirements;
3) have not been denied or terminated from RCA under Subdivision K of this directive;
4) provide the name of the resettlement agency which resettled him/her; and
5) are not full-time students in institutions of higher education except where such enrollment is approved by the Department as part of an individual employability plan.

b. All recipients of RCA who are not eligible for medical assistance are eligible for RMA. A refugee or entrant may not be required to actually receive or apply for RCA as a condition of eligibility for RMA.

c. Continued Refugee Medical Assistance (RMA) Coverage of Recipients who Receive Increased Earnings from Employment

If a refugee or an entrant who is receiving RMA receives increased earnings from employment, the increased earnings must not affect his/her continued medical assistance eligibility. The refugee or entrant should continue to receive RMA until he/she reaches the end of his/her time-eligibility period for RCA, - that is, the first eight months of U.S. residency. In cases where a refugee or an entrant obtains private medical coverage, any payment of RMA for that individual must be reduced by the amount of the third party payment.

G. Documentation of Financial Need.

In order to prove that the applicant and others in his/her household are eligible for cash assistance, determine the following:

1. the sources and amount of previous income or maintenance;
2. the reason and date of discontinuance of previous income and maintenance;
3. presumptive eligibility for benefits relating to loss of income; and
4. employability and availability of employment.

H. Consideration of Income and Resources.

The social services district may not consider the following as income and resources:
1. any resources remaining in the applicant's country of origin; and

2. a sponsor's income and resources solely because the person is serving as a sponsor.

I. Need Standard and Payment Levels

1. In determining need for RCA, the social services district must apply the need standards for ADC established under Part 352 of the Department Regulations, except that the earned income disregard of $30 plus one-third of the remainder of the applicant's or recipient's monthly earned income set forth in Subdivision (c) of Section 352.20 of the Department Regulations will not apply.

2. In determining the amount of the RCA grant to an eligible applicant or recipient of RCA, the social services district must apply the payment level which would be appropriate for an eligible filing unit of the same size under the ADC program.

3. The date RCA begins must be the same date, in relation to the date of application, as assistance would begin under the ADC program.

J. Time Limitation of Eligibility for RCA and RMA

1. RCA and RMA benefits are limited to the first eight months of the refugee's or entrant's residency in the U.S. from the date of entry to the U.S.

2. When an Eligibility Specialist (New York City) or a Welfare Examiner (in the rest of the State) receives notice (either by receipt of a report or other control mechanism in New York City or by means of an AFA report in the rest of the State) that a refugee or entrant who is in receipt of RCA entered the U.S. eight months ago, the district must reassess the refugee's or entrant's eligibility for cash assistance. If he/she is no longer eligible for cash assistance, the case must be closed, and the refugee or entrant must be notified of discontinuance of the RCA case and the right to a fair hearing, as provided in Part 358 of the Department's regulations. If he/she is still eligible for cash assistance, the case must be reclassified and benefits continued under the correct category of assistance: ADC, ADC-U, HR, PG-ADC, or SSI.

K. Requirements for Employment Services.

This subdivision sets forth requirements for applicants for and recipients of RCA concerning registration for employment services, participation in social services, and acceptance of appropriate employment.
1. Registration for Employment Services, Participation in Job Interviews, and Acceptance of Appropriate Offers of Employment.

   a. As a condition for application for and receipt of RCA, the applicant or the recipient who is not exempt must, except for good cause, do the following:

      1) Register for employment-related services;
      2) Participate in any employment-related services program which provides job or language training determined to be appropriate for that refugee or entrant;
      3) Carry out job searches determined to be appropriate for that refugee or entrant;
      4) Go to job interviews arranged by the services provider; and
      5) Accept an offer of employment determined to be appropriate by the service provider.

   b. The social services district must permit, but may not require, the voluntary registration for employment services of an applicant or recipient who is exempt under Paragraph 2 of this subdivision, below.


   a. The social services district must consider an applicant for or recipient of RCA to be employable unless the applicant or recipient is:

      1) Under age 16;
      2) Under age 18 and a full-time student in secondary school or in the equivalent level of vocational or technical training and reasonably expected to complete the program before reaching age 19;
      3) Ill or injured to the extent that he/she is temporarily unable to engage in an employment and training program;
      4) Incapacitated, when determined by a physician or licensed or certified psychologist and verified by the social services district that a physical or mental impairment, by itself or in conjunction with age, prevents the individual from engaging in employment or training.
      5) 65 years of age or older;
      6) Needed in the home because another member of the household requires his/her presence due to a mental or physical impairment or illness verified by a physician or a licensed or certified psychologist and it is determined that no other appropriate household member is available to provide necessary care. Such person must be advised of their option to participate in available employment and training opportunities, and must be informed of the available services for care of a disabled person;
7) A parent or other caretaker relative of a child under the age of 3, who personally provides full-time care of the child with only very brief and infrequent absences from the child. Only one parent or other relative may be exempt;

8) Working at least 30 hours a week in unsubsidized employment expected to last a minimum of 30 days. This exemption continues to apply if there is a temporary break in full-time employment expected to last no longer than 10 working days; or

9) Pregnant, if it has been medically verified that the child is expected to be born in the month in which such registration would otherwise be required or within the next 6 months.

b. Inability to communicate in English does not exempt a refugee or an entrant from registration for employment services, participation in job interviews, and acceptance of appropriate offers of employment.

3. Effect of Quitting Employment or Failing or Refusing to Participate in Required Services.

a. The social services district must advise the employable applicant as a condition of eligibility for RCA that he/she may not, without good cause, within 30 consecutive calendar days immediately prior to application for assistance, have voluntarily quit employment or have refused to accept an offer of employment determined to be appropriate by the service provider, using criteria set forth in paragraph 6 of this subdivision.

b. The social services district must advise the employable recipient as a condition of continued receipt of RCA that he/she may not, without good cause, voluntarily quit employment or fail or refuse to meet the requirements of Paragraph 1 of this subdivision.

4. Service Requirements for Employable Recipients of RCA

a. As a condition of continued receipt of RCA, a recipient who is not exempt under Paragraph 2 of this subdivision and who is employed less than 30 hours a week, must accept employment services, as available and determined to be appropriate, using criteria set forth in Paragraph 6 of this subdivision, provided that such services must not interfere with the recipient's current employment.

b. The social services district is required to refer those refugee or entrant applicants for, or recipients of, RCA mentioned above in sub-paragraph a, to the appropriate refugee social services provider for the provision of employment services. In the case of refugees and entrants who are in need of cash assistance and services for them to
achieve economic self-sufficiency, the Department has entered into contracts with certain public or private community agencies specifically to deal with refugees and entrants for the provision of such services. For further information, the list of refugee social services providers is furnished with this directive as Attachment A. (See Section VI - Additional Information).

5. Development of an Employability Plan

a. An individualized employability plan as part of a family self-sufficiency plan must be developed, using Department form DSS-3366 (see Section VI) or other form(s) approved by the Department, to assess the potential of the identified refugee or entrant, and must describe a program of services intended to result in their earliest possible employment.

b. The individualized employability plan must:

1) Be designed to lead to the earliest possible employment and not be structured in such a way to discourage or delay employment or job-seeking;

2) Contain a definite employment goal, attainable in the shortest time period consistent with the employability of the refugee or entrant in relation to job openings in the area; and

3) Enable the individual to find a job as a way of supporting him/her and his/her family.

6. Criteria for Appropriate Employment Services and Employment

Employment services and employment must meet the following criteria:

a. All assignments to services must be within the scope of the individualized employability plan. The plan may be modified by the case manager with the registrant to reflect changed services or employment conditions;

b. The services or employment must be related to the capability of the individual to perform the task on a regular basis. Any claim by the registrant of adverse effect on physical or mental health must be based on adequate testimony from a physician or a licensed or certified psychologist indicating that participation would impair the individual's physical or mental health;

c. The total daily commuting time must not normally exceed two hours, not including the transporting of a child to and from a child care facility, unless a longer commuting distance or time is generally accepted in the community, in which case the round trip commuting time must not exceed the generally accepted community standards;
d. When child care is required, the care must meet the standards set forth in Part 415 of the Department Regulations;

e. The service or work site to which the recipient is assigned must not be in violation of applicable Federal, State, or local health and safety standards;

f. Assignments must not be made which are discriminatory in terms of age, sex, creed, color, or national origin;

g. Appropriate work may be temporary, permanent, full-time, part-time, or seasonal if such work meets the other standards of this subparagraph;

h. The wage shall meet or exceed the Federal or State minimum wage law, whichever is applicable;

i. The daily hours and the weekly hours of work shall not exceed those customary to the occupation; and

k. No individual may be required to accept employment if:

1) the position offered is vacant due to a strike, lockout, or other bona fide labor dispute; or

2) the individual would be required to work for an employer contrary to the conditions of his existing membership in the employee organization governing that occupation.

7. Failure or Refusal to Carry out Job Interviews or to Accept Employment Services or Employment

a. Voluntary Registrant

When a voluntary registrant, who is exempt from mandatory registration, has failed or refused to participate in appropriate employment services, to carry out job interviews, or to accept appropriate offers of employment, he/she may be deregistered for up to 90 days from the date of determination that such failure or refusal has occurred, but his/her cash assistance may not be affected.

b. Mandated Registrant

1) Termination or Reduction of Assistance

When, without good cause, a mandated registrant for RCA who is not exempt from registration under Paragraph 2 above (Criteria for Exemption), has failed or refused to meet the requirements of Paragraph 1 of this subdivision or has voluntarily quit a job, the service provider must notify the appropriate social services district for action in accordance with sub-paragraphs a) through c), below.
a) Conciliation

i) A social services district official must issue a Conciliation Notification, using Department form DSS-4230 (see Section VI), to each applicant or recipient of RCA who refuses or fails to comply with the requirements of this subdivision. Such notice must be issued as soon as possible, but no later than 10 days following the date of failure or refusal to participate, and advise the registrant of his/her refusal or failure to comply and that he/she has 7 days to request conciliation with the district regarding any dispute related to such refusal or failure to comply.

ii) If the registrant requests conciliation within 7 days, conciliation will be commenced promptly in accordance with Subdivision 373.7 of Department Regulations, and it will be the registrant's responsibility to provide reasons for such refusal or failure to comply.

iii) The conciliation effort may continue for a period not to exceed 30 days. The period of conciliation may be terminated in less than 30 days if the social services district and the registrant mutually agree that the dispute cannot be resolved by conciliation.

iv) Whether or not the district and the registrant, with the assistance of the mediator, resolve the issues related to the registrant's refusal or failure to comply, a written document summarizing the conciliation must be given or sent to the registrant by the district within 10 days of the termination of conciliation. The district must incorporate such document into the registrant's case record and, in the event of a fair hearing, present it as required in accordance with Section 358-4.3 of Department Regulations. If the district determines that the refusal or failure to comply was willful and without good cause, then the district official must issue a notice of intent to reduce or discontinue assistance pursuant to sub-paragraph b. 1) b) of this subdivision (next page), and notify the recipient of the right to a fair hearing.

v) If the registrant does not respond to the 7 day conciliation letter, then the district official must issue an adequate notice of intent to discontinue or reduce cash assistance in accordance with the provisions of sub-paragraph b. 1) b) (again, next page) of this subdivision.

vi) No sanction related to the registrant's failure to comply may be imposed during the conciliation period.
b) Timely and Adequate Notice of Intent to Discontinue or Reduce Cash Assistance

i) In case of proposed action to discontinue, suspend, or reduce assistance after the conciliation effort, the social services district must give timely and adequate notice, using the Department form DSS-4004: Notice of Intent to Change Public Assistance Grant and/or Food Stamp Benefits and/or Medical Assistance Coverage for Non-Compliance with Employment Related Requirements (see Section VI);

ii) The written notice must include:

(a) An explanation of the reason for the action and the consequences of such failure or refusal; and
(b) Notice of the registrant's right to a fair hearing under Part 358 of Department Regulations.

c) Sanctions

i) If the sanctioned individual is the only member of the filing unit, the assistance shall be terminated. If the filing unit includes other members, the district shall not take into account the sanctioned individual's needs in determining the filing unit's need for assistance.

ii) The sanction shall remain in effect for 90 payment days for the first such failure and 180 payment days for any subsequent such failure.

V. Systems Implications

New York City:

Cases eligible to receive RCA must be opened with a Category of Home Relief (HR) and one of the following State/Federal Charge Codes: "30 (Refugees); 34 (Cuban Entrants); or 36 (Haitian Entrants). Entry of these codes also requires entry of the following information: Date of Entry, Alien Number, and Undocumented Indicator. Even though RCA's are exempt from regular HR employment requirements, an Employability Code of 70 (Contesting Employability Determination) should be entered until a new Employability Code is made available for these cases. Cases entitled to RCA are not subject to the 45 day waiting period other HR's are subject to. All benefits due them for the first 45 days until they start receiving recurring benefits must be issued via Single Issues. Workers must be reminded to reassess eligibility near the end of the 8 month eligibility period for RCA.

The Rest of the State:

Districts outside of New York City must code eligible RCA recipients as HR cases (Case Type 16) and enter one of the following Federal
Charge Codes: "30-Refugees"; "34-Cuban Entrants"; or "36-Haitian Entrants". Entry of any of these codes also requires entry of the following information:

1) Citizenship Code;
2) Alien Number;
3) Date of Entry;
4) National Origin Code; and
5) Resettlement Agency Code.

Since RCAs are exempt from regular HR employment requirements, an Employability Code of "70-Contesting Employability Determination" must be entered until a new employability code is made available for these cases. The Federal Charge Codes listed above require entry of certain Anticipated Future Action (AFA) Codes. Workers must enter an Anticipated Future Action (AFA) Code of "351-Refugees, Cuban/Haitian Entrants (HR/FP-MA-8 Months)" and an associated date for the appropriate individual(s), reminding workers to reassess eligibility near the end of the 8 month eligibility period.

VI. Additional Information

A. Required Forms

The Department requires the social services district to use the following for the administration of RCA program:

1. APPLICATION FOR: Public Assistance - Medical Assistance - Food Stamps - Services (DSS-2921/DSS-2921NYC)
2. Family Self-Sufficiency Plan (DSS-3366).
3. Conciliation Notification (DSS-4230).
4. Notice of Intent to Change PA Grant and/or Food Stamp Benefits and/or Medical Assistance Coverage for Noncompliance with Employment Related Services (DSS-4004)

B. List of Service Providers

A statewide list of service providers under contract with the Department to provide employment services to refugees and entrants is furnished with this Directive as Attachment A.

VII. Effective Date

This Administrative Directive pertaining to RCA is effective immediately, retroactive to Nov. 16, 1995.

________________________________
Rose M. Pandozy
Deputy Commissioner
Division of Services and Community Development