



CDSS

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DEPARTMENT OF SOCIAL SERVICES

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GOVERNOR

January 14, 2010

ALL COUNTY LETTER NO. 10-03

TO: ALL COUNTY WELFARE DIRECTORS
ALL SFIS COORDINATORS
ALL CalWORKs PROGRAM SPECIALISTS
ALL FOOD STAMP PROGRAM SPECIALISTS

SUBJECT: STATEWIDE FINGERPRINT IMAGING SYSTEM (SFIS) CLARIFICATION:
VICTIMS OF DOMESTIC ABUSE; PHOTOGRAPHING CLIENTS AND
FINGERPRINT IMAGING

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

The purpose of this letter is to outline special procedures for clients who have changed their identities as a result of identifying themselves as victims of domestic abuse. In addition, this letter clarifies procedures for taking photograph and fingerprint images of clients when clients present themselves with long fingernails for fingerprinting or their face is partially obscured for photographing.

Victims of Domestic Abuse

When a domestic abuse victim who has changed their name applies for benefits and submits fingerprints under the new identity, it should generate a SFIS “match” consisting of two records with the same fingerprints and similar photos, but different personal information (name, social security number and residence).¹ The county must verify the victim’s new identity. This can be accomplished by examining supplemental documentation provided by the victim such as a letter from the Social Security Administration, Department of Motor Vehicles, or a court order. For more information regarding Domestic Abuse protocols, please see All County Information Notice 1-02-06.

Once county staff have verified the new identity, the County SFIS Coordinator should be immediately contacted. Prior to imaging the client, the County SFIS Coordinator should contact the SFIS Help Desk at 1-866-860-7347 to have the old SFIS record inactivated. Although the original image will be removed from the database, it will still be accessible to the state SFIS administrators.

¹ A SFIS match would be expected unless the fingerprint images are poor quality, or the county made a mistake and imaged the wrong fingers.

After the client is imaged, a comment should be included in the new SFIS record to provide an audit trail that a prior record for the client exists. This notation will properly alert any subsequent staff accessing the record to the sensitivity of the case without disclosing information on the prior identity. For example, "This client is a domestic abuse victim who has changed their identity. Information on this individual's prior record is available by contacting the SFIS Help Desk. Please handle carefully."

Photographing Clients

Questions have arisen when clients have presented themselves for photographic imaging wearing mustaches, beards, hats, sunglasses, veils, or other items that may partially obscure the face. The regulations do not provide authority to prohibit items that individuals may wear or use on their head or face. The operator may request that a client remove caps, glasses, facial jewelry or other items that may be partially covering the face. However, if an individual refuses to comply, the photo image must be acquired with the client attired as he or she chooses (Manual of Policies and Procedures (MPP) Section 40-105.31 and All-County Letter No. 00-32). Because the photo image is not the primary identifier, the operator must not impose any requirements for a photograph even with partially blocked facial features.

Fingerprint Imaging

The SFIS operator is required to obtain a readable fingerprint of the client. If excessive length of an index fingernail prevents a client from being properly finger imaged, the operator must ask the client to cut the nail and advise the client that a readable fingerprint is a condition of eligibility for CalWORKs and a condition of issuance for Food Stamps (MPP 40-105.3 and MPP 63-505.14). While the client has the right to refuse to cut the nail, that refusal will render the entire assistance unit/household ineligible for aid until a readable fingerprint can be obtained. The equipment operator should not attempt to take an upside down image of the finger or to substitute another finger.

Questions regarding this All County Letter should be directed to the Department's Fraud Bureau at (916) 263-5700.

Sincerely,

Original Document Signed By:

CHARR LEE METSKER
Deputy Director
Welfare to Work Division