Update 2010-3: Common Place
Statewide Fingerprint Imaging System (SFIS) Clarifications

Background
This update provides special procedures for clients who have changed their identities as a result of domestic abuse. In addition, this update clarifies procedures for taking photograph and fingerprint images of clients when they have fingernails that are too long for fingerprinting or their face is partially obscured for photographing.

Changes
This update includes the following changes and clarifications:

- Duplicate SFIS results for Victims of Domestic Abuse,
- Photographing of clients with obscured or partially blocked facial features, and
- Fingerprint Imaging for clients with excessively long nails.

Victims of Domestic Abuse
When a victim of domestic abuse who has changed their name and is applying for benefits submits fingerprints under their new identity, it should generate an SFIS “match” consisting of two records with the same fingerprints and similar photos however, different personal information (name, social security number and residence) should be displayed. The EW must verify the victim’s new identity by examining supplemental documentation provided by the victim such as:

- A letter from the Social Security Administration,
- Department of Motor Vehicles identification, or
- A court order.

Once the EW has verified the new identity, the district office Information System (IS) liaison must contact the SFIS Systems Administrator through the Help Desk at (408) 491-6565. The
SFIS Systems Administrator will contact the state SFIS Help Desk at 1 (866) 860-7347 to request the old SFIS record to be de-activated.

Comments must be included in the new SFIS record to provide an audit trail that a prior record for the client exists. These comments will alert any subsequent staff accessing the record to the sensitivity of the case without disclosing information of the client’s prior identity.

[Refer to “Victims of Domestic Abuse,” page 2-6]

**Photographing Clients**

Regulations do not provide counties with the authority to prohibit items worn by individuals on their head or face. The client should be informed by their EW to remove caps, glasses, veils, facial jewelry or other items that may be partially covering their face prior to having their photo taken. However, if an individual refuses to comply, the photo image must be taken as the client appears. Because the photo is not the primary identifier, the county must not impose any requirements for a photograph even when facial features are partially blocked.

[Refer to “Photographing Clients [MPP 40-105.31],” page 2-3]

**Fingerprint Imaging**

A readable fingerprint of the client must be obtained. If excessive length of an index fingernail prevents a client from being properly finger imaged, the EW 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. While the client has the right to refuse to cut their nail, that refusal will render the entire assistance unit/household ineligible for aid until a readable fingerprint can be obtained.

[Refer to “Fingerprint Imaging [MPP 40-105.3 and MPP 63-505.14],” page 2-2]

**Implementation**

The changes in this update are effective immediately upon receipt of this update.

**Documentation**

Any special circumstances concerning the SFIS requirements for the client must be documented by the Eligibility Worker in the *Maintain Case Comments* window of CalWIN.

**Other Programs**

The changes in this update apply to the CalWORKs and Food Stamp programs only.
Clerical

Office Management Coordinators (OMCs) must review this update with their respective staff at their next clerical meeting but no later than 3/05/10. OMCs must ensure that clerical persons responsible for the SFIS processing in their district office have reviewed and understand the above “Changes” section.

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