June 7, 2018

ALL COUNTY LETTER (ACL) NO. 18-68

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL COUNTY CALFRESH PROGRAM SPECIALISTS
ALL COUNTY REFUGEE COORDINATORS
ALL COUNTY CONSORTIA PROJECT MANAGERS
ALL COUNTY WELFARE CHIEF FRAUD INVESTIGATORS
ALL COUNTY SFIS COORDINATORS

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs): NOTICE OF STATEWIDE FINGERPRINT IMAGING SYSTEM (SFIS) REPEAL


The purpose of this letter is to inform County Welfare Departments (CWD) that the use of the Statewide Fingerprint Imaging System (SFIS) as a requirement for issuing California Work Opportunity and Responsibility to Kids (CalWORKs) benefits shall be discontinued effective July 1, 2018, and that CWDs must verify the identity of all adult applicants in person, with limited exceptions. These requirements also apply to those applicants interviewing telephonically or through other electronic means.

Repeal of SFIS

SB 89 (Chapter 24, Statutes of 2017) repealed the SFIS requirement, effective July 1, 2018. Current state statute and regulations regarding the use of SFIS as a condition of benefit issuance for CalWORKs as specified in WIC 10830 and Manual of Policies and Procedures (MPP) Section 40-105.3 remain in effect until June 30, 2018.
SFIS Decommissioning

The Office of Systems Integration released a decommissioning plan and schedule to counties under separate cover. If you have any questions regarding the decommissioning of SFIS, contact the SFIS Help Desk at 1-866-860-7347.

Identity Requirements

Effective July 1, 2018, CWDs must stop using SFIS for all cases.

In addition, effective July 1, 2018, CWDs are required to verify the identity of all adult applicants in person. With limited exceptions, all adult CalWORKs applicants must present a form of photo identification to complete the application and eligibility determination process. The new identity verification requirement applies even when a CalWORKs application interview is completed telephonically or through other electronic means.

CalWORKs applicants who received CalFresh, Medi-Cal, or CalWORKs prior to July 1, 2018, who are already known to the Statewide Automated Welfare System (SAWS) and whose photo identification is part of their electronic case records, are not required to come in-person to the CWD to resubmit their photo identification as part of the verification process, unless the CWD has reason to request in-person identity verification in the course of gathering of documentation necessary to make an eligibility determination. Continuing current practice, when evidence of identity is conflicting, inconsistent or incomplete, CWDs must require in-person identity verification of applicants, even if already known to the SAWS, to confirm eligibility.

CalWORKs applicants who have not received CalFresh, Medi-Cal, or CalWORKs prior to July 1, 2018, and are therefore not known to the SAWS are required to present, in person, a photo identification to the CWD to verify identity. A county may issue benefits to a CalWORKs applicant prior to the applicant presenting his or her photo identification in person, under limited circumstances:

- If the applicant is in immediate need of benefits pursuant to MPP Section 40-129. The county shall verify the applicant's eligibility for aid and verify their identity within 15 working days from the date of receipt of the Immediate Need payment request.

- When acceptable photo identification does not exist, any applicant's sworn statement under penalty of perjury regarding identity will be considered sufficient. However, the applicant must present his or her photo identification in-person within 15 days for benefits to be continued. If the applicant presents evidence of good-faith efforts to obtain photo identification, the county shall continue aid.
All County Letter (ACL) 14-26 provides guidance on the types of documents an applicant may submit to meet the identity requirement. The following are examples of acceptable forms of photo identification:

- Driver’s License
- Photo Identification (from government agency, school, etc.)
- Passport
- USCIS (formerly INS) documents with photo

The Manual of Policies and Procedures (MPP) 40-107 specifies the CWD’s responsibility in assisting the applicant as needed in establishing eligibility. The MPP §40-115.22 further specifies the applicant’s requirement to participate in the gathering of evidence necessary to make an eligibility determination insofar as he/she has the capacity to do so. When the county has determined the applicant has made a good faith effort to obtain the evidence and the third party imposes a fee to obtain the evidence, the CWD shall pay the fee on behalf of the applicant or recipient as mandated in WIC § 11275.10(b). Guidance on claiming the costs associated with fees paid to obtain the evidence can be found in ACL 14-26.

**Waiving Face-to-Face Interview for CalWORKs**

The repeal of SFIS does not change the CWDs’ ability to provide the CalWORKs application interview telephonically or through other electronic means pursuant to the provisions of SB 947 (Chapter 798, Statutes of 2016). As a reminder, a CWD is required to submit its electronic interviewing plan in writing to CDSS, prior to implementing electronic interviews at application.

For questions regarding SFIS repeal, please contact the Program Integrity and Automation Branch at (916) 654-2125. For questions regarding CalWORKs eligibility, please contact the CalWORKs Eligibility Bureau at (916) 654-1322.

Sincerely,

*Original Document Signed By:*

TODD R. BLAND
Deputy Director
Family Engagement and Empowerment Division