




Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston MA 02111

William F. Weld
Governor
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Lieutenant Governor

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Field Operations Memo 96-11
April 1, 1996

TO: Local Office Staff

FROM:  Joyce Sampson
Assistant Commissioner for Field Operations

RE: Facial Image Identification Cards

INTRODUCTION

New Facial Image Identification Cards are replacing the Photo ID Cards. As a condition of eligibility, TAFDC grantees who receive the grant for the assistance unit, AFDC grantee-relatives, EAEDC grantees, and persons authorized to transact a food stamp household's ATP, including an authorized representative (all of the preceding hereinafter referred to as the applicant/recipient), must cooperate with the facial image identification requirement and obtain a facial image identification card as a condition of eligibility.

The Department must inform all applicants/recipients that:

1. facial images will be used to verify eligibility, detect fraud and effectively administer the Department's programs.
2. there is no fee for the initial or first replacement identification card; however, for the second replacement and each replacement thereafter, there will be a \$5 fee.

A copy of the Image-5 form (see Attachment E) must be given to applicants with the "Your Right to Know" or to recipients **before** the facial image is taken. The Image-5 form explains how the Department will use images and the replacement of facial image identification cards and fees for second or subsequent replacement identification cards.

Note: *Do not enter the first facial image identification card on the PIRS system.* Systems will be archiving previous photo ID information from PIRS, therefore past photo ID replacement cards will not be counted. Applicants/recipients are entitled to one initial and one replacement facial image identification card at no cost.

IMAGE IDENTIFICATION SYSTEM (IIS) IDENTIFICATION CARDS

Identification cards produced by the Image Identification System are plastic cards and have a facial image, or, in certain circumstances, are issued as "Valid Without Photo ID."

Note: A manager's signature is required on the Image-1 form (see Attachment A) authorizing a "Valid Without Photo ID" card.

EMERGENCY CARDS

Emergency Cards, without a facial image, are paper cards which are valid for five days and issued *when the imaging system is not functioning* and the Department is unable to issue a facial image identification card or, if appropriate, an IIS "Valid Without Photo ID" card. The regular facial image identification card must be issued as soon as possible. Emergency cards will be issued to an individual in whose name the ATP is issued, or the authorized representative, in a food stamp household who has an ATP in hand, including an expedited ATP, and:

1. needs an initial facial image identification card,
2. has requested a replacement facial image identification card and, if required, paid the replacement fee for a facial image identification card,
3. is awaiting a decision from the Legal Division regarding an exception due to religious beliefs, or
4. is an emergency-authorized representative for a household when neither the individual in whose name the ATP is issued nor the regular authorized representative is able to obtain food stamps and the household has designated an emergency-authorized representative in accordance with Food Stamp policy, 106 CMR 364.910(B).

Note: A manager's signature is required on the Image-1 form (see Attachment A) authorizing an emergency card.

FACIAL IMAGE EXEMPTIONS

Certain applicants/recipients are exempt from having a facial image on the IIS identification card and must be issued a "Valid Without Photo ID" identification card. If a person is eligible for more than one program and the exemption does not apply to both programs, the facial image identification requirement must be met. (Example: an EAEDC recipient who receives food stamps as a resident of a drug treatment facility must meet the facial image identification requirement.) The following people are exempt from meeting the facial image identification requirement:

1. **A TAFDC, AFDC, EAEDC or FS applicant/recipient whose religion does not allow him or her to have an image captured**

If an applicant/recipient states that he or she cannot have his or her image captured due to religious beliefs:

- Ask the applicant/recipient to provide a written, signed statement explaining as completely as possible the biblical or other basis of his or her religious beliefs for refusal. If the applicant/recipient cannot write or has a language problem, the worker or an interpreter may assist him or her by writing out the statement.
- Forward the statement, with a brief cover memo requesting a decision as to whether this meets the religious exemption, through the local office director to the Legal Division, attention IIS, at Central Office.

Note: The Legal Division will respond within 10 days with a written decision and advise the local office whether to issue the card without a photo or advise the applicant/recipient that he or she does not meet the religious exemption. The worker must file the written decision in the case record.

- If the applicant/recipient meets the religious exemption, issue a card without a facial image.
- If the applicant/recipient does not meet the religious exemption, ask if he or she would like to cooperate in meeting the facial image identification requirement. If yes, issue a card with the facial image. If no, do not issue a card, but list the applicant/recipient on the Image-4 - Image ID - Non-compliance Log. (See Attachment D.) Deny or close the applicant/recipient.

Note: If an applicant/recipient refuses to cooperate in the facial and/or finger imaging, use action reason 40: failure to provide required verification(s). The applicant's/recipient's needs will not be considered in determining the amount of the assistance grant and/or food stamp benefits.

2. **A TAFDC, AFDC, EAEDC or FS applicant/recipient unable to come to the local office due to serious personal illness** - The illness must be verified by a written statement from a competent medical authority and must give the expected duration of the illness. The applicant/recipient must be issued a "Valid Without Photo ID." At the expiration of this verification, the applicant/recipient must surrender the "Valid Without Photo ID" identification card and cooperate in obtaining an *initial* facial image identification card, or submit a new medical statement verifying continued incapacity.
 - Obtain a data/signature card from the Image ID Operator and mail it to the applicant/recipient with instructions to sign the card and to return it to his or her worker.
 - When the data/signature card is returned, prepare a "Valid Without Photo ID" card and mail it to the applicant/recipient.
3. **Food stamp households certified by out-of-office interviews** - The applicant/recipient must be issued a "Valid Without Photo-ID" card.
 - Obtain a data/signature card from the Image ID Operator and mail it to the applicant/recipient with instructions to sign the card and to return it to the food stamp worker.
 - When the data/signature card is returned, prepare a "Valid Without Photo ID" card and mail it to the applicant/recipient.

If the appropriate applicant/recipient reports to the office for any reason, he or she shall be required to cooperate in the facial image identification requirement and obtain an *initial* facial image identification card. When the facial image identification card is issued, request the "Valid Without Photo ID" card back and destroy it.

4. **Food stamp households certified at Social Security Administration offices under the SSI-Food Stamp joint processing rules** - Food stamp-defined "elderly" and "disabled" applicants and recipients who have had their food stamp application jointly processed by SSA and DTA may receive a "Valid Without Photo ID." If the applicant/recipient comes to the food stamp office for recertification, he or she must cooperate with the facial image identification requirement and obtain an *initial* facial image identification card.
 - Obtain a data/signature card from the Image ID Operator and mail it to the applicant/recipient with instructions to sign the card and to return it to the appropriate worker.
 - When the data/signature card is returned, prepare a "Valid Without Photo ID" card and mail it to the applicant/recipient.

When the facial image identification card is issued, request the "Valid Without Photo ID" card back and destroy it.

5. **Food stamp applicants or recipients who are residents of drug/alcohol treatment and rehabilitation programs will not be issued facial image identification cards** - The facility's authorized representative shall be issued a facial image identification card. If a resident leaves the facility during the month, he or she shall be issued a facial image identification card, if otherwise eligible for food stamps.

IMAGE IDENTIFICATION CARDS THAT ARE RETURNED OR THAT ARE NOT PICKED UP

The Image ID Operator is responsible for invalidating all identification cards returned to the local office or not picked up within one month. To invalidate an identification card, one hole is punched through the card with a hole punch. The hole must go through the state seal. Invalidated identification cards are to be placed in the holding bin located at each imaging station.

CARDS PRODUCED IN ERROR

The Image ID Operator is responsible for invalidating cards produced with wrong information and cards made with production errors. To invalidate an identification card, one hole is punched through the card with a hole punch. The hole must go through the state seal. The invalidated cards must be listed on the Image-3: IIS Card Problem Exception Log. (See Attachment C.)

FORWARDING OF INVALIDATED CARDS TO CENTRAL OFFICE

At the beginning of each month, managers must forward both returned cards and cards produced in error to the Image ID Unit at Central Office. Cards produced in error should be banded together and be accompanied by a completed Image-3: IIS Card Problem Exception Log. (See Attachment C.) All cards must be sent to:

Department of Transitional Assistance
Image ID Unit
600 Washington Street
Boston, MA 02111

IMAGE IDENTIFICATION SYSTEM (IIS) PROBLEMS

The Image ID Operator must inform the manager as soon as a problem with the system occurs. The manager will notify the EDP Coordinator who will handle the problem.

If the Image ID Operator is able to capture images, but unable to produce an identification card, the Image ID Operator should continue to capture images for card production at a later date. The Image ID Operator should also indicate on the Image-1 form what delivery method will be used when the card is produced.

If the Image ID Operator cannot capture images, the manager will determine if emergency identification cards will be used. (See previous section on Emergency Cards.)

IMAGE FORMS

1. **Image-1 - Request for Image ID** (See Attachment A)

The local office worker completes the blocks for the following information and gives the form to the Image ID Operator:

- PIRS, Social Security Number, Category, CAN, Office #, Date of Issue, Name, Date of Birth, Card Type and Method of Identification.

The Image ID Operator completes the blocks for the following information:

- Delivery Method, Image System Down, Emergency ID Issued and Emergency ID #.

The Image ID Operator must also staple the applicant's/recipient's signature card to the Image-1 form and return the form to the local office worker, who will file it in the case record.

Note: "Valid Without Photo" must be authorized by a manager.

2. **Image-2 - Request for Image ID - Treatment Center/Halfway House**
(See Attachment B)

This form is completed by the local office worker. Fill in all blocks.

Note: A manager's authorization is not required for issuance of a "Valid Without Photo Card for Home Health Care Agency."

The completed form is given to the Image ID Operator before an identification card is made.

3. **Image-3 - IIS Card Problem Exception Log** (See Attachment C)

This log requires the listing of any card created or produced in error, i.e., with the wrong information, bad color, or cards with error messages on the IIS system. The Image ID Operator is responsible for completing any entries on this form. See the section on "Cards Produced in Error" below.

4. **Image-4 - Image ID - Non-Compliance Log** (See Attachment D)

This log requires the listing of any applicant/recipient refusing to comply with the imaging requirement. The local office worker is responsible for completing any entries on this form.

5. **Image-5 - Your Right to Know How the Department Will Use Facial and Finger Images - Replacement of Facial Image Identification Cards**
(See Attachment E)

The local office worker must give a copy of this form to an applicant with the "Your Right to Know" and to recipients **before** a facial image identification is done.

6. **Image-10 - (Authorized Representative form)**

This form must be completed and signed by the food stamp head of household to authorize a representative to cash the ATP and use the food stamps on his or her behalf.

If your office has not received a supply of the above forms by the time you have begun the facial image identification process, please photocopy the attached forms. An initial supply will be sent shortly.

IMAGE IDENTIFICATION SYSTEM (IIS) PENS

For quality and consistency of image signatures, continue to use the special Photo ID Pentel rolling writer pens. Pens may be ordered from:

Department of Transitional Assistance
Image ID Unit
600 Washington Street
Boston, MA 02111

Tel: (617) 348-5040

QUESTIONS

If you have policy questions, have your Hotline designee call the Policy Hotline at (617) 348-8478.

Questions about the imaging system should be directed to the Image ID Unit at (617) 348-5040.



- P Original
- I
- R System Down
- S

Request for Image ID

Document Number _____

Social Security Number <input style="width: 100%;" type="text"/>	Category <input style="width: 100%;" type="text"/>	CAN <input style="width: 100%;" type="text"/>	Office # <input style="width: 100%;" type="text"/>	Date of Issue MM DD YYYY - -
Name Please Print <input style="width: 100%;" type="text"/>				Date of Birth MM DD YYYY <input style="width: 100%;" type="text"/>
Last <input style="width: 100%;" type="text"/>			Middle Initial <input style="width: 100%;" type="text"/>	
First <input style="width: 100%;" type="text"/>				

Card Type

- | | |
|--|---|
| <input type="checkbox"/> Original

<input type="checkbox"/> Authorized ID
<input type="checkbox"/> Authorized Representative
<input type="checkbox"/> SSI Elderly/Disabled
<input type="checkbox"/> Valid without Photo | <input type="checkbox"/> Replacement

<input type="checkbox"/> Authorized ID <input type="checkbox"/> Charge
<input type="checkbox"/> Authorized Representative
<input type="checkbox"/> SSI Elderly/Disabled
<input type="checkbox"/> Valid without Photo |
|--|---|

Reason for Replacement

- | | | |
|--------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> Name Change | <input type="checkbox"/> SSN Change | <input type="checkbox"/> Worn: Verified |
| <input type="checkbox"/> Lost | <input type="checkbox"/> Stolen | <input type="checkbox"/> Other: Explain _____ |

Method of Identification

Valid Without Photo ID

Date _____ Manager's Authorization Signature _____

Delivery Method Take Now Pick up Later Mail

Image System Down Cannot Capture Cannot Print

Emergency ID Issued Yes No

Emergency ID # _____

Date _____ Manager's Authorization Signature _____

Signatures

Signature of Applicant/Recipient

Signature of Worker

Authorized Representative Data

SSN _____

Name of Authorized Representative

Signature of Authorized Representative



Massachusetts Department of
Transitional Assistance

IIS Card Problem Exception Log

Office _____

Date	Case Name	Soc. Sec. #	Type of Problem	Resolution

Total Number of Cards _____

Date Report Sent to Finance _____

Send at the close of each month



Image - ID Non-Compliance Log

Name	SSN	Reason	Worker #	Date

Attachment D



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Attachment E

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Your Right to Know How the Department Will Use Facial and Finger Images

If you are a TAFDC, AFDC, EAEDC or food stamp applicant or recipient, the Department of Transitional Assistance requires the collection of facial images as a condition of eligibility. The Department may use these images for computer matching with the Department's own files to verify eligibility, detect fraud and effectively administer the Department's programs. The Department may also use these images to conduct other matches authorized by law.

If you are a TAFDC or AFDC applicant or recipient in the Springfield or Lawrence offices, the Department of Transitional Assistance requires the collection of both facial and finger images as a condition of eligibility. The Department has obtained a federal waiver which allows both facial and finger images to be computer matched with the Department's own files to verify eligibility, detect fraud and effectively administer the Department's programs. The Department may also use these images to conduct other matches authorized by law.

If you refuse to allow the Department to take your facial and/or finger image, this will be considered a failure to verify personal information which is a condition of eligibility. Failure to verify this information will result in a denial or reduction of cash benefits equal to your portion of the assistance grant and/or food stamps.

Su Derecho a Estar Informado Cómo el Departamento Utilizará sus Imágenes Faciales y Dactilares

Si usted es un solicitante o beneficiario del programa de Ayuda Transicional a Familias con Niños Dependientes (TAFDC), Ayuda a Familias con Niños Dependientes (AFDC), Ayuda de Emergencia para Ancianos, Incapacitados y Niños (EAEDC), o de cupones de alimentos, el Departamento de Asistencia Transicional exige que se le tomen imágenes faciales como un requisito de elegibilidad. El Departamento puede emplear estas imágenes para efectuar comparaciones computarizadas con los propios archivos del Departamento a fin de verificar elegibilidad, detectar fraude y para administrar efectivamente los programas del Departamento. Asimismo, el Departamento puede utilizar estas imágenes para realizar otras comparaciones autorizadas por la ley.

Si usted es un solicitante o beneficiario del programa TAFDC o AFDC en las sedes de Springfield o Lawrence, el Departamento de Asistencia Transicional exige que se le tomen imágenes faciales y dactilares como un requisito de elegibilidad. El Departamento ha obtenido un asentimiento federal el cual permite utilizar las imágenes faciales y dactilares para efectuar comparaciones computarizadas con los propios archivos del Departamento a fin de verificar elegibilidad, detectar fraude y para administrar efectivamente los programas del Departamento. Asimismo, el Departamento puede utilizar estas imágenes para realizar otras comparaciones autorizadas por la ley.

Si rehusa a que el Departamento tome su imagen facial y/o dactilar, esto se considerará como una falta de cumplimiento para verificar la información personal, la cual es una condición de elegibilidad. En caso de no poderse verificar esta información, tendrá como resultado que le niegen o reduzcan sus beneficios en efectivo igual a su parte del subsidio de auxilio y/o cupones de alimento.

Replacement of Facial Image Identification Cards

The Department of Transitional Assistance requires the collection of facial images as a condition of eligibility. Facial images are used for identification cards. There is no charge for either the initial or first replacement identification card.

Beginning with the second replacement identification card and each replacement identification card thereafter, there will be a \$5.00 fee. The \$5.00 fee must be paid by check or money order and must be paid before the facial image is taken or a new identification card is issued. Cash will not be accepted.

Reemplazo de las Tarjetas de Identificación con Imagen Facial

El Departamento de Asistencia Transicional exige que se le tomen imágenes faciales como un requisito de elegibilidad, las cuales se utilizan para las tarjetas de identificación. La tarjeta de identificación inicial o la primera tarjeta de reemplazo es gratis.

A partir del segundo reemplazo de la tarjeta de identificación y de cada tarjeta subsiguiente, existe un cargo de \$5,00, los cuales se deben pagar en cheque o giro postal antes de que se tome la imagen facial o que se emita la nueva tarjeta de identificación. No se aceptará dinero en efectivo.



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Date _____

I authorize _____ to act as
my representative for all food stamp transactions.

This will entitle him/her to cash my Authorization to Participate (ATP) and
to use my food stamps to grocery shop on my behalf.

Your Signature

Your Social Security Number

Your Telephone Number

Your Address

Signature of Authorized Representative

Social Security Number of Authorized Representative