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Informational Letter

Section 1

Transmittal:	06-INF-16
To:	Local District Commissioners
Issuing Division/Office:	Division of Program Support and Quality Improvement
Date:	May 16, 2006
Subject:	Program Integrity Questions and Answers
Suggested Distribution:	Temporary Assistance (TA) Directors Food Stamps (FS) Directors TOP Coordinators Front End Detection System (FEDS) Coordinators Fraud Directors Staff Development Coordinators Fair Hearings Staff
Contact Person(s):	See Attachment II for Detailed Listing of Contact Persons for Each Program Integrity Initiative
Attachments:	Attachment I – Cost Avoidance Chart Attachment II – Program Integrity Staff Contact List
Attachment Available On Line:	Yes

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.

Section 2

- I. **Purpose** – The purpose of this directive is to assist eligibility staff, investigative staff and other local district staff with answers to Program Integrity questions.
- II. **Background** – In 2005, OTDA’s Program Integrity Unit participated in four New York Welfare Fraud Investigator Association (NYWFIA) regional meetings at the following locations: Albany, Syracuse, Buffalo and White Plains. Over 400 local district eligibility and investigative staff attended. Questions that were asked at the regional meetings, and also other recent local district questions, have been incorporated into this directive on the following topics:

- A. Automated Finger Imaging System (AFIS)
- B. Intentional Program Violation (IPV)
- C. Front End Detection System (FEDS)
- D. Eligibility Verification Review (EVR)
- E. Computer Matches
- F. Cost Avoidance

III. Program Implications

A. Automated Finger Imaging System (AFIS)

1. Q. Our AFIS operators are having a problem with clients who have very long fingernails and because of the length of the nails they are unable to get a clean finger image. If the person does not agree to trim his/her nails to allow us to get a clear image, can we close the case/reject the application?

A. Yes. In accordance with 99-ADM-9, "if an applicant causes a condition to exist on his/her finger which prevents an acceptable finger image from being taken, they should be scheduled for another appointment within 48 hours. Such conditions would include application of foreign substances to the finger(s) and any alterations to the natural state of the client's fingers. If the applicant fails to appear at the rescheduled appointment, or a condition continues to exist on his/her fingers, the application must be denied or the case closed for failure to comply with the finger image requirement." Long or extended finger nails would be a condition that can prevent an operator from capturing a quality finger image.

2. Q. If someone is on, say, FS, and they're finger-imaged and then they come back in and apply for TA, will they be finger-imaged again? If so, how would they appear on the report--as an error?

A. No, they would not be finger imaged again. When they come back in to apply for TA, the AFIS operator would retrieve their existing AFIS record from the OTDA AFIS database, complete an Identity Verification (one-to-one finger image comparison), and then add the TA program to the existing record. This process is referred to as a "program add."

3. Q. Is there ever a time when a hit in the AFIS system is identifying a person receiving under a different program than the one applying for and, therefore, the hit is not "significant"?

A. All AFIS Matches are considered "significant;" however, some matches are not fraudulent. For example, if the AFIS operator does not properly search the AFIS database prior to enrolling an already existing client, an AFIS Match can be created which is not deemed to be fraudulent. We refer to them as Administrative Errors.

4. Q. Do all counties finger image Medicaid-only (MA-only) clients?

A. Yes.

5. Q. What are the current AFIS exemptions?

A.

AFIS Exemption Indicator	
Indicator	Description
1	Finger Imaged
2	Exempted – L & R Index Finger Permanently Unavailable or Permanently Unusable
3	Temporarily Unavailable or Unusable – One Finger
4	Temporarily Unavailable or Unusable – Two Fingers
5	Exempted Individual Good Cause Reason
6	Exempted Homebound Individual
7	Exempted SSI Related
8	Exempted Congregate Care Facility
9	Exempted Long Term Care (In-patient)
A	County Specific Approved Exemption (Approved via AFIS Plan of Operation)
P	Purged from AFIS
Values 1-4 are NOT worker enterable. These values will be system-filled via a weekly AFIS batch update interface.	
Values 5-8 and “A” are allowable for all case types.	
Value 9 is only valid for MA case types.	
Value “P” is NOT worker enterable. This value will be system-filled via a weekly AFIS batch update interface. Value “P” can be overwritten by Values 5-9, and “A”.	

6. Q. How do you calculate cost avoidance for the Automated Finger Imaging System (AFIS)?

A. Please see Section 6 and Attachment I of this directive for AFIS cost avoidance information.

B. Intentional Program Violations

7. Q. I see that IPV codes are enabled for New York State Nutrition Improvement Project (NYSNIP) cases, but under what circumstances would I pursue an IPV on a NYSNIP case?

A. A NYSNIP case is still a FS case, even though NYSNIP is a demo project, and there are currently no change reporting requirements for a NYSNIP case. An example would be someone who is currently not NYSNIP, but applies for FS and qualifies for expedited processing, and then converts to NYSNIP. If someone is applying for FS, they must give complete and accurate information just like any

other FS applicant. If, for example, the FEDS investigation uncovers information that indicates a false instrument was filed, an IPV should be pursued, even if the case opened under expedited processing and was then subsequently converted to NYSNIP. For NYSNIP cases opened via the automatic case opening process, a FEDS investigation would not be appropriate. However, if it were discovered, for example, that a NYSNIP participant filed fraudulent information in order to secure a higher benefit, an IPV could be pursued.

8. Q. I assigned an IPV code to a NYSNIP recipient and closed the case, and the next month the case automatically reopened. It is very frustrating to have done all this work to obtain an IPV and then have it reversed by the system—plus, the individual should not be receiving FS benefits. What is going on?

A. This is a timing issue involved between the delivery of the SDX data that forces a NYSNIP opening and the actual transmission of that data to the Welfare Management System (WMS)—an interim “pending file” is created. In your situation, the NYSNIP file for the following month had been created prior to your inputting the IPV code into WMS, so it did not pick up the IPV code. We understand your frustration, and we are going to run the creation of the NYSNIP file more frequently to cut down on these timing issues.

9. Q. Can I put through an IPV on a Transitional Benefit Assistance (TBA) FS case?

A. Yes. Question 90 of 03 INF-10 explains that a TBA transition period may end before the fifth month for the following reasons: If the household reopens TA, moves out of state, incurs an IPV or fleeing felon disqualification, or requests an early recertification for a benefit increase.

When you enter the IPV into WMS and remove the “T” (for TBA) from the Automated Budgeting and Eligibility Logic (ABEL) budget, the FS case will be taken out of the TBA transition period and a recertification will be required for the remaining members of the FS case.

10. Q. Is giving your Electronic Benefit Transfer (EBT) card to another for cash or drugs considered trafficking for FS?

A. Yes. Federal Regulation 7 CFR 271.2 states that *Trafficking* means the buying or selling of coupons, “ATP” (now referred to as EBT) cards or other benefit instruments for cash or consideration other than eligible food; or the exchange of firearms, ammunition, explosives, or controlled substances, as defined in Section 802 of Title 21, United States Code, for coupons.

11. Q. What if a FS recipient purchases food and then sells the food—is this an IPV offense?

A. The intent of the FS program is for clients to feed themselves and their families. Federal regulation 7CFR 271.1 states that the purpose of the FS program is to

"safeguard the health and well being of the nation's population by raising the levels of nutrition among low-income households", and Federal regulation 7CFR 273.16 (c)(2) defines an IPV as "committed any act that constitutes a violation of the Food Stamp Act, the Food Stamp Program Regulations, or any State statute for the purpose of using, presenting, transferring, acquiring, receiving, possessing or trafficking of coupons, authorization cards or reusable documents used as part of an automated benefit delivery system (access device)."

We are currently awaiting USDA clarification to see whether these regulations support the pursuit of an IPV in the above situation.

C. Front End Detection System (FEDS)

12. Q: I'm an Eligibility Worker--what do I have to do with Program Integrity?

A: Everything. You are one of the first persons to see the applicant. Your assessment of the person and the application and documentation is critical as to whether this person is referred for a FEDS investigation, Eligibility Verification Review or a fraud investigation. Also, your timely and correct action on applications or cases referred back to you by the Fraud Investigation Unit can save the county, State and federal government thousands of dollars. It also can assist you in making sure that the household receives the correct benefit amount within the required application processing timeframes. However, eligibility determination must be pursued independently of FEDS, especially for the FS program, with its shorter application processing timeframe. The processing of applications must not be delayed awaiting the conclusion of a FEDS investigation. Failure to process a FS application within allotted timeframes may result in a quality control error.

13. Q. Why is FEDS not used at recertification?

A. The purpose of FEDS is to try to detect at the initial certification whether there are any indicators surrounding the application that need further investigation. At initial certification, a case is being built from the ground up. At recertification, many things have already been established, and the interview tends to focus first on those items already established. Eligibility workers at any time can do a fraud referral for a case that appears problematic, and local districts have the option to request an Eligibility Verification Review process for populations that may be problematic during undercare or at recertification.

14. Q. You recently automated the FEDS reports. What data is produced from this information?

A. We would like to thank the counties for their patience and cooperation in converting to the automated reports. The data that is captured on the FEDS reports is loaded into a performance measurements database that is run quarterly. This database captures for FEDS two ratios:

- The number of FEDS referrals a county does vs. the total number of applications a county has; and
- The number of “successful” (i.e., resulted in a denial, withdrawal or grant reduction) referrals vs. the total number of referrals.

15. Q. What is this data used for?

A. OTDA Program Integrity staff run reports to try to determine how well counties are doing with the different initiatives and if corrective action or training needs to be offered. The performance measurement reports are also sent to each county commissioner and fraud director for their own use in monitoring their county and in comparing the performance of their county to others.

16. Q. How do I record your newest addition to the FEDS report, “Applications Denied/Withdrawn for Reasons Other Than FEDS?”

A. Some counties had approached us because they felt (and we agreed) that some applications were withdrawn or denied fairly quickly, especially for these two common actions:

- (1) Failure to comply with employment requirements; and
- (2) Failure to verify.

In these instances, the FEDS investigation had not started yet; or it had started, but the client was not aware of the investigation (so no assumption could be made that the client failed to comply or verify because the investigation “scared them off”). We used to include these instances in the "No Error Found" category, but that was not really correct because no investigative action had ever determined if an error was there or not. We now have this separate column for instances where the denial has nothing to do with the FEDS referral and, therefore, no cost avoidance for the FEDS process can be claimed. If you have instances where your investigation results in a reason for denial and that coincides with the worker's assessment to deny for a reason other than FEDS, then you can take the cost avoidance associated for a FEDS denial. For example, if the worker has indicated to you that there will be a denial for failure to comply, but you in the meantime have uncovered concealed wages and the application could be denied for excess income, then go ahead and record the resolution and claim the cost avoidance because you have done your work.

17. Q. My county was not audited for FEDS in 2005. Will I be audited in 2006?

A. Yes. The goal for 2006-07 is to audit the counties who were not audited in Phase One (8/04 – 12/05), as well as to return to those counties who had poor audits in Phase One to help ensure that they have improved.

18. Q. There was discussion that FEDS “best practices” would be shared with the districts, but we haven’t seen anything yet.

A. In conducting our first phase of audits, it became clear to us that there was some confusion and misunderstanding about FEDS. As such, we did not identify many best practices that helped counties achieve an outstanding rating. However, below is a list of items that were identified to be helpful:

- Preparation of the FEDS plan and referral form using a combined effort between and soliciting input from both the investigative and eligibility units;
- Printing the FEDS referral form in a bright color to remind eligibility workers to complete it and make it easily locatable;
- Reporting back to the eligibility unit the total monthly cost avoidance achieved by the FEDS referrals so that eligibility staff understand their important role in the FEDS process;
- Having investigative staff provide in-house training on FEDS to new eligibility workers, and having eligibility staff provide program training to new investigators;
- Building a strong relationship between eligibility and investigations so that eligibility workers feel comfortable asking investigators for their assistance in correctly determining a case, and investigators feel comfortable talking to eligibility workers to gather more background information and discuss the status of the investigations; and
- Developing automated processes to help with referrals and tracking.

19. Q. If our county wants to update our FEDS plan, what do we do?

A. If your county's FEDS plan was submitted prior to the issuing of 05 ADM-08 and your plan is on the old FEDS template, you must complete your plan on the new template and email it to Maria Schollenberger (*see Attachment II*). If you already have an approved plan on the new template and you wish to make small revisions, you may email the requested revisions to Maria Schollenberger (*see Attachment II*), and she will make a note in your plan. Large revisions must be emailed on the new template.

20. Q. If our county wishes to implement MA FEDS or CC (Child Care) FEDS, do we still go through OTDA?

A. To assist counties, OTDA has offered to continue to be the conduit between the other two approving State agencies. Counties may continue to submit plans to OTDA, and OTDA will forward them, or they can contact the approving agencies directly:

MA FEDS	Jean Shannon	jms10@health.state.ny.us	518.473.5337
CC FEDS	David Dorpfeld	david.dorpfeld@ocfs.state.ny.us	518.402.3985

Either way, the Department of Health or the Office for Children and Family Services will contact the county directly regarding their plan and will copy OTDA on the letter.

21. Q. Our eligibility staff do not give us the disposition of the application that was referred for FEDS. Is it ok if we put down on the FEDS report what we recommended the action to be?

- A. No. The FEDS report must contain the actual application disposition so that the reporting and performance measurement data is accurate. Counties have told us that they have helped alleviate this situation by having supervisory staff from both the eligibility side and investigative side meet and work out the best way to get the information passed from eligibility to investigations. OTDA encourages this so that the data you transmit is correct.

22. Q. What OTDA programs are allowable for FEDS?

- A. FEDS is mandatory for Family Assistance (FA) and Safety Net Assistance (SNA) applications. FEDS is optional for Emergency Assistance to Families (EAF), the Home Energy Assistance Program (HEAP), Food Stamps (FS), Medicaid (MA) and Child Care (CC). FEDS is not allowed for Emergency Assistance for Adults (EAA) applications. Please note that any optional program areas that you use for FEDS must be specified in your FEDS plan.

23. Q. Is the Client Notice System (CNS) code for “Intentional Misrepresentation” for Temporary Assistance denials and closings, explained in the FEDS 05 ADM-08, available yet?

- A. The code is M40, and it is available at this writing for use only as a TA denial. Local districts who wish to use this reason for a closing would need to send a manual notice.

24. Q. If a FEDS investigation uncovers a TA intentional misrepresentation, are we allowed to deny an application for a 131-s emergency payment?

- A. The Division of Employment and Transitional Supports (DETS) and the Program Integrity Unit are in agreement that if a FEDS investigation uncovers an intentional misrepresentation regarding needs, resources, etc., (as specified in the actual Regulation 18 NYCRR 351.1(b)(2)), then you are allowed to deny a TA application for the 131-s payment. The reason is because an intentional misrepresentation in needs, resources, etc., may very well mean that the misrepresented item would make the client ineligible for the 131-s payment. However; please remember that if you do not have the results of the FEDS investigation by the programmatic deadline (in this situation, the programmatic deadline is the *same day*), then you must take action on the application that day without the investigation results. It is unlikely that a district would be able to uncover the same day an intentional misrepresentation. However, if you do get the FEDS investigation results the same day and you can properly document it

(especially since this denial might go to a fair hearing), you are allowed to deny for the 131-s payment. The individual may immediately reapply and, if eligible, must be provided with the 131-s payment.

D. Eligibility Verification Review (EVR)

25. Q. What is the difference between FEDS and EVR?

A. Unlike FEDS, EVR is not mandated by OTDA. FEDS is only for application-- EVR can be for application and recertification. FEDS has referrals that are based on State-approved indicators. EVR uses referrals for a population, such as “Safety Net applicants who do not meet a FEDS indicator.” However, please note that the cost avoidance calculations for FEDS and EVR, as explained in Section 6 of this directive, are the same.

26. Q. If my county would like to implement an EVR process, whom do I contact?

A. Please contact Maria Schollenberger (*see Attachment II*), and she will assist you.

E. Computer Matches

27. Q. When we get a computer match, do we need to investigate it, or is it “verified upon receipt?”

A. 04 INF-20 outlines TA policy regarding computer matches, and 06 INF-10 outlines FS policy regarding computer matches. Some matches are verified upon receipt and require no further investigation, while others require additional investigation before adverse action may be taken.

28. Q. I am assigned many tasks as an Eligibility Worker and have many priorities ahead of taking the time to close a case for, say, a prison match or a felon match. Is any help on the way at the State level?

A. OTDA is trying to help with this by developing an “autoclose” process for our computer matches that will initiate closings at the State level. When a prison, fleeing felon or Public Assistance Reporting Information System (PARIS) match is run, because the results are verified upon receipt for both TA and FS, OTDA will try to transmit the individuals hit on the matches to WMS with the applicable closing codes. Counties will receive the match information prior to the file migration to WMS so that they will have the information if a client requests a conference or fair hearing upon receipt of the adverse action notice. We hope to pilot this process for single individual cases in the near future.

29. Q. I received a prison match for a NYSNIP case. I know that prison inmates are not eligible for FS, but if I attempt to close a NYSNIP case, won't it automatically reopen again next month?

A. Yes, but that is changing. OTDA recently modified the NYSNIP automated case opening program so that cases closed using the fleeing felon closing code F35

will no longer reopen if the case being closed is a NYSNIP case. Please see GIS Message 06TA/WMS010 regarding this modification. This applies to fleeing felons identified on the NYS match and the NCIC match. We will be working with the Division of Employment and Transitional Supports (DETS) to attempt to correct this situation for the prison and PARIS duplicate assistance closing codes (F63 and N66, respectively) in the near future.

30. Q. I have a situation on an National Crime Information Center (NCIC) fleeing felon match where a client missed traffic court in Virginia so the case was elevated to a felony. Do we know if this is a felony in NYS?

A. It only has to be a felony from the place a person is fleeing from. Please see State Regulations 18NYCRR 387.2(j) (1) and 351.2(k) (3).

31. Q. Can I remove an individual from a Transitional Benefit Assistance (TBA) FS case if they appear on a NCIC or a Division of Criminal Justice Services (DCJS) fleeing felon match? What if they appear on a (Department of Correctional Services (DOCS) or DCJS prison match?

A. You are allowed to take action on a fleeing felon in a TBA FS case. Question 90 of 03 INF-10 states that a TBA transition period may end before the fifth month for a fleeing felon disqualification. When you enter the CNS Fleeing Felon Code F35 in CNS and remove the "T" (for TBA) from the ABEL budget, the FS case will be taken out of the TBA transition period and a recertification for FS will be required for the remaining members of the FS case.

You are not allowed to take any action for a prison match on a TBA FS case.

32. Q. How do I record PARIS individual closings or multi-person case closings or removals?

A. If you have a hit for an individual, and that individual is the sole person in the case, you would use the resolution "Single Individual Case Closed/Individual Removed from Multi-Person Case." If you have a hit on an individual who is in a multi-person case, but none of the other individuals in that case are a hit for the match, you would still use the resolution "Single Individual Case Closed/Individual Removed from Multi-Person Case."

If everyone in the case has a hit on the PARIS match, you would record "Multi-Person Case Closed" for each hit because the entire case will close.

33. Q. What is the "National Directory of New Hires" (NDNH) computer match? Is it new?

A. Yes. The purpose of this computer match is to identify employment information on a national basis for TANF adult recipients and then verify this information in terms of actual receipt of income. By obtaining this information that cannot currently be obtained from the State New Hires match, we will be able to identify the impact of such income on TANF eligibility and prevent fraud.

34. Q. Will we ever be able to use the NDNH data for TANF applicants or for FS applicants/recipients?

A. The match is only allowable at this time for TANF recipients, but it may be opened up in the future for TANF applicants. USDA has expressed interest that it would like this data to be available for FS applicants and recipients, but this will not likely happen before 2007 at the earliest.

F. **Cost Avoidance**

35. Q. What is cost avoidance?

A. Cost Avoidance is the mathematical calculation of either what an application might have cost the State and counties if it had not been denied, or what a recipient receiving benefits would have continued to cost the State and counties if his/her case had not been closed.

36. Q. How is cost avoidance calculated for Program Integrity initiatives, such as FEDS or a prison match?

A. A statewide average monthly cost of either a case or individual is computed and multiplied for either six or 12 months, depending upon the initiative. Please see Attachment I which details the monthly costs.

37. Q. What is “grant reduction” cost avoidance?

A. Cost avoidance may also be calculated in the form of a grant reduction amount, as opposed to a denial or closing amount, if a case is remaining open. A grant reduction savings may be calculated in instances where the FEDS report of investigation provides a finding that gives the applicant a budget that is lower than if the finding was not present. For example, the investigation revealed that an absent parent is in the household and is working. The family is still eligible because the added income does not make the family ineligible, but the grant is lower than if the absent parent and the income were not budgeted.

Please note that latest cost avoidance figures now reflect a FS grant reduction cost avoidance amount.

38. Q. Who determines “Average Monthly Costs” for an individual or case?

A. OTDA’s budget staff, through a variety of mathematical formulas, determines average monthly costs on a statewide basis for both individuals and cases, according to case type.

39. Q. When do I multiply the monthly amount by six months?

A. You would multiply by six months when you are calculating cost avoidance for FEDS or EVR. For example, a FA denial that was the result of a FEDS investigation would result in a gross cost avoidance figure of \$7,062 (\$2,982 for

the FA benefit, \$3,096 for the Medicaid benefit and \$984 for the FS benefit). It is assumed that an applicant of TA would also receive MA and FS. The monthly average is multiplied by six because, on the average, if a case is opened, it is not reviewed until six months later.

40. Q. When do I multiply the monthly amount by 12 months?

A. You would multiply by 12 months when you are calculating cost avoidance for the following Program Integrity initiatives:

- Public Assistance Reporting Information System (PARIS) Interstate computer match;
- National Crime Information Center (NCIC) Federal Bureau of Investigation fleeing felon computer match;
- Department of Correctional Services (DOCS) prison computer match;
- Division of Criminal Justice Services (DCJS) prison and fleeing felon computer matches;
- Massachusetts fleeing felon computer match;
- Electronic Benefits Transfer (EBT) out-of-state computer match; or
- Automated Finger Imaging System (AFIS);

Please note that you will use either a monthly *individual* amount or monthly *multi-person case* amount, depending on the situation.

41. Q. What about cost avoidance for Intentional Program Violations?

A. For Intentional Program Violations, you would use the Individual figure on this chart and the duration would be the number of months of the disqualification. If it is a permanent disqualification, use the “per year” amount listed.

42. Q. What about cost avoidance for the Automated Finger Imaging System (AFIS)?

A. The calculations work on the same principle. When a case is coded in WMS as closed/denied for failure to comply with finger imaging, or as a result of an AFIS Match, the monthly amount in cost avoidance savings are calculated. This monthly amount is then multiplied by 12 months to determine the total cost avoidance for that closing/denial. For example, a FA closing/denial that was a result of the AFIS Program would result in a gross cost avoidance figure of \$15,708 (\$6,336 for the multi-person FA benefit, \$2,268 for the multi-person Food Stamp benefit, and \$7,104 for the multi-person Medicaid benefit). AFIS cost avoidance calculations always take the multi-person case monthly amounts. Cost avoidance calculations for any initiative assume that applicants or recipients

of TA are also receiving MA and FS. Please see Attachment I which details the monthly costs.

43. Q. How current are the cost avoidance figures used?

- A. Cost avoidance amounts were revised for all Program Integrity initiatives for use on actions taken in June, 2005.

44. Q. Why is cost avoidance important?

- A. Cost avoidance is important because the staff time and money spent on Program Integrity initiatives, both at the State and county level, directly result in application denials, grant reductions and case closings. This savings must be measured, somehow, to determine the success of each initiative, and these figures are used by both counties and the State to estimate necessary staffing levels and projected budgetary savings.

Issued By

Name:

John M. Paolucci

Title:

Deputy Commissioner

Division/Office:

Program Support and Quality Improvement

Attachment I

Cost Avoidance Calculation Chart, Amounts Effective June 1, 2005

Case Type	Per Case Cost	Per Case Cost	Per Case Cost	Per Case Cost
	Average Monthly Amount	Total Cost Avoidance *For FEDS/EVR (Average Monthly Amount Multiplied By 6 Months)	Total Cost Avoidance **For AFIS (Average Monthly Amount Multiplied By 12 Months)	Total Cost Avoidance ***For PARIS multi-person cases For EBT (Average Monthly Amount Multiplied By 12 Months)
FA	\$528	\$3,168	\$6,336	\$6,336
FA-FS	\$189	\$1,134	\$2,268	\$2,268
FA-MA	\$592	\$3,552	\$7,104	\$7,104
SNA	\$480	\$2,880	\$5,760	\$5,760
SNA-FS	\$190	\$1,140	\$2,280	\$2,280
SNA-MA	\$910	\$5,460	\$10,920	\$10,920
FS	\$211	\$1,266	\$2,532	\$2,532
EAF	\$44	NA	\$528	\$528
FA Grant Reduction	\$226	\$1,356	NA	\$2,712
SNA Grant Reduction	\$270	\$1,620	NA	\$3,240
FS Grant Reduction	\$87	\$522	NA	\$1,044
MA-Only	\$568	\$3,408	\$6,816	\$6,816
SSI	\$76	\$456	NA	\$912
MA-SSI	\$1,574	\$9,444	NA	\$18,888
HEAP	\$56	\$336	NA	NA
Child Care	\$500	\$3,000	NA	NA
	Per Individual Cost			Per Individual Cost
	Average Monthly Amount			Total Cost Avoidance ****For PARIS, NCIC, Prison, Felon and Mass. Felon (Average Monthly Amount Multiplied By 12 Months)
FA	\$226			\$2,712
FA-FS	\$107			\$1,284
FA-MA	\$254			\$3,048
SNA	\$270			\$3,240
SNA-FS	\$107			\$1,284
SNA-MA	\$511			\$6,132
FS	\$87			\$1,044

This chart is to assist local districts who wish to prepare their own cost avoidance reports.

*For FEDS or EVR, find the Case Type and the Average Monthly Amount Per Case and then multiply by **six** months to determine the total cost avoidance.

For AFIS, find the Case Type and the Average Monthly Amount Per Case and then multiply by **12 months to determine the total cost avoidance.

***For EBT out-of-state match and PARIS multi-person cases, find the Case Type and the Average Monthly Amount Per Case and then multiply by **12** months to determine the total cost avoidance.

****For PARIS [single individual cases], NCIC felon, Prison, Felon and Massachusetts Felon, find the Case Type and the Average Monthly Amount Per Individual and then multiply by **12** months to determine the total cost avoidance.

Note: For Intentional Program Violations, you would use the Individual figure on this chart and the duration would be the number of months of the disqualification. If it is a permanent disqualification, use the "per year" amount listed.

Attachment II

Program Integrity Staff Contact List

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PROJECT	CONTACT/E-Mail	PHONE #	FAX #
AFIS (Automated Finger Imaging System) Policy, Procedures & Plan of Operations	Primary - Diane Ley Diane.Ley@otda.state.ny.us	(518) 402-0132	(518) 402-0121
	Secondary - Kristin Cooke Kristin.Cooke@otda.state.ny.us	(518) 402-0131	(518) 402-0121
AFIS Records Management, Reports, Training, Passwords & Equipment Requisitions	Primary - Kristin Cooke Kristin.Cooke@otda.state.ny.us	(518) 402-0131	(518) 402-0121
	Secondary - Diane Ley Diane.Ley@otda.state.ny.us	(518) 402-0132	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
EBT (Electronic Benefit Transfer) Fraud	Primary - Bill Donnelly William.Donnelly@otda.state.ny.us NO SECONDARY CONTACT	(518) 402-0129	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
EVR (Eligibility Verification Review) Plans & Policy	Primary - Maria Schollenberger Maria.Schollenberger@otda.state.ny.us	(518) 402-0127	(518) 402-0121
	Secondary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
EVR Monthly Reports	Primary - Steve Bach stephen.bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
	Secondary - Maria Schollenberger Maria.Schollenberger@otda.state.ny.us	(518) 402-0127	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
FEDS (Front End Detection System) Policy & Plans	Primary - Maria Schollenberger Maria.Schollenberger@otda.state.ny.us	(518) 402-0127	(518) 402-0121
	Secondary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
FEDS Monthly Reports	Primary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
	Secondary - Maria Schollenberger Maria.Schollenberger@otda.state.ny.us	(518) 402-0127	(518) 402-0121

Attachment II

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
FBI NCIC (National Crime Information Center) Computer Match	Primary - Richard Preus Richard.Preus@otda.state.ny.us	(518) 474-4906	(518) 402-0121
	Secondary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
IPV (Intentional Program Violations)	Primary - Judy lemma Judy.lemma@otda.state.ny.us	(518) 402-0118	(518) 402-0121
	Secondary - Bill Donnelly William.Donnelly@otda.state.ny.us	(518) 402-0129	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
Lottery Intercepts for PA	Primary - Leonard Tremblay Leonard.Tremblay@otda.state.ny.us	(518) 486-1071	(518) 402-0121
	NO SECONDARY CONTACT		

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
Massachusetts Fugitive Felon Computer Match	Primary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
	Secondary - Richard Preus Richard.Preus@otda.state.ny.us	(518) 474-4906	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
NYS Fugitive Felon Computer Match	Primary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
	Secondary - Richard Preus Richard.Preus@otda.state.ny.us	(518) 474-4906	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
NYS Prison Computer Match	Primary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121
	Secondary - Richard Preus Richard.Preus@otda.state.ny.us	(518) 474-4906	(518) 402-0121

Attachment II

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
PARIS (Public Assistance Reporting Information System) Interstate Computer Match	Primary - Richard Preus Richard.Preus@otda.state.ny.us	(518) 474-4906	(518) 402-0121
	Secondary - Steve Bach Stephen.Bach@otda.state.ny.us	(518) 402-0117	(518) 402-0121

PROJECT	CONTACT/E-Mail	PHONE #	FAX #
NDNH (National Directory of New Hires Computer Match)	Primary – Ronnie Miller Ronnie.Miller@otda.state.ny.us	(518) 486-5070	(518) 402-0121
	Secondary – Lisa McLain Lisa.McLain@otda.state.ny.us	(518) 408-5349	(518) 402-0121