

**DATE:** April 25, 2019

**TO:** Subscribers

**SUGGESTED DISTRIBUTION:** Commissioners, TA Directors, Front End Detection System (FEDS) Coordinators, Fraud Directors, Staff Development Coordinators

**FROM:** Jeffrey Gaskell, Assistant Deputy Commissioner  
Employment and Income Support Programs

**SUBJECT:** Finger Imaging Requirements for Temporary Assistance Applicants and Recipients

**EFFECTIVE DATE:** Immediately

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## Purpose

The purpose of this GIS is to inform social services districts (districts) that the New York State Office of Temporary and Disability Assistance (OTDA) has proposed changes to State regulations to eliminate all finger imaging requirements for purposes of Temporary Assistance (TA). However, current regulations, requirements and district plans for finger imaging for TA remain in effect until these proposed regulations become effective.

## Background

Since 1996, New York State has had a regulatory requirement that adult applicants and recipients of TA must be finger imaged. Section 351.2(a) of 18 NYCRR currently requires that districts must, in accordance with an operational plan approved by OTDA, conduct finger imaging of all members of a household 18 years of age or older and the head of a household applying for or receiving TA benefits.

Removing the finger imaging requirement will simplify the TA application process and improve access to TA for vulnerable low-income New Yorkers. OTDA's proposed changes to State regulations to eliminate all finger imaging requirements for purposes of TA will help eliminate this barrier.

## Program Implications

Districts must continue to comply with current regulations and their current Automated Finger Imaging System (AFIS) Plans of Operation until they receive notification of the effective date of the new regulations and instructions from OTDA regarding new policies and procedures.