

INTRODUCTION

On January 20th and 21st of 2015, Field Examiner Gerard R. Biron of the Department of Health and Human Services (DHHS) conducted a review of the administration of the General Assistance (GA) program by the City of Portland. The review took place at the Portland General Assistance office, where Field Examiner Biron was given access to the WELPAC database, which is the city of Portland's electronic GA eligibility system used to determine GA eligibility and to store case file information. He was also given access to individual paper case files as well. During this two day period he was supplied supplemental information connected to the City of Portland run shelters as well as clients who had spent time at the shelters. This review was conducted pursuant to 22 M.R.S. § 4323¹ as well as the State of Maine General Assistance Policy Manual, which includes Code of Maine Regulations (CMR) 10-144, Chapter 323, Section X, which provides for such reviews and sets forth specific procedures for conducting them. Pursuant to said Section X, the examiner reviewed 90 cases, the minimum required by the regulations given the number of monthly cases processed in Portland. In addition, the Field Examiner and DHHS GA Program Manager David MacLean interviewed a number of Portland GA administrators as part of the review of the operation of the City's program. Finally, on January 28th and 29th of 2015, Field Examiner Ellen Moore reviewed claims that the City of Portland represented it had paid to aliens that the City of Portland characterized as either "qualified" or "non-qualified," based on whether the aliens met or did not meet the eligibility criteria set forth in 8 U.S.C. § 1621(a).

Based on that review², DHHS has concluded that the City of Portland is in violation of a number of statutory and regulatory requirements, including but not limited to improper eligibility determination and reimbursement practices with respect to the operation of Portland's Oxford Street Shelter and Family Shelter. Specifically, the method by which Portland has been seeking reimbursement for

¹ Hereinafter, any reference to a statutory section shall refer to Title 22, M.R.S., unless otherwise indicated.

² A similar review in 2013 produced broadly comparable results, and supports the findings set forth herein.

costs related to these shelters is impermissible under existing law and needs to be corrected. These conclusions are, of course, based on the best available current information, and are subject to modification upon receipt of further information.

In summary, the review found the following violations:

1. Eligibility of shelter residents for assistance is not being determined as required by statute. Specifically, it is not being determined on at least a monthly basis as required by 22 M.R.S. § 4309, and eligibility applications are not being properly processed.
2. The presumptive eligibility provisions set forth in 22 MRS § 4304 are being incorrectly applied by the City to improperly permit eligibility beyond an initial night at the shelter. Eligibility beyond such initial night must be determined using the eligibility standards specified for all applicants. 'Presumptive' eligibility does not mean 'permanent' eligibility.
3. The General Assistance program is designed to permit reimbursement to municipalities for amounts paid to eligible individuals. It does not permit reimbursement to municipalities for operating expenses of shelters apart from costs directly attributable to eligible individuals. The submission of requests for reimbursement for shelter operating costs is impermissible.
4. The City of Portland, contrary to the requirements of the applicable statutes and regulations, is not requiring residents of an emergency shelter to utilize any income or resources they have for their current needs, as required by 22 MRS § 4317 and related regulations, nor are they requiring that eligibility for assistance be based on need as must be required of all applicants.

5. The City of Portland is incorrectly submitting reimbursement requests for individuals who are not US citizens or otherwise eligible for state and local public benefits under 8 U.S.C. § 1621.

REVIEW OF RELEVANT STATUTORY AND REGULATORY REQUIREMENTS

“General Assistance” is a state program involving joint municipal and state participation in aid to the poor, pursuant to Maine Revised Statutes, Title 22, Part Five, Chapter 1161, codified at § 4301 *et seq.* As a general proposition, municipalities pay benefits to eligible individuals after making a determination that such individuals meet all eligibility criteria established under relevant law (which include factors such as income and assets, economic need, residence, citizenship or immigration status, compliance with work requirements, and non-fugitive status). Municipalities are entitled to reimbursement from the state of a portion of those properly paid expenses.

Among the important statutory provisions governing the General Assistance program are the following:

8 U.S.C. § 1621 generally provides that aliens are not eligible for state and local public benefits (which includes General Assistance) unless they fall into one of the categories set forth in § 1621(a). Those categories cover: “qualified aliens” under 8 U.S.C. § 1641; non-immigrant aliens under the Immigration and Nationality Act; and aliens paroled into the United States under 8 U.S.C. § 1182(d)(5) for a period of less than one year.

22 MRSA § 4304 states that each municipality must have a general assistance office or designated place where a person may apply for assistance at regular reasonable times. Additionally, “the municipality must issue a written decision on all applications [for aid] within 24 hours.” Subsection (3) further provides that “Municipalities may arrange with emergency shelters for the homeless to presume eligible for municipal assistance persons to whom the emergency shelter provides shelter services.”

22 MRSA § 4308, captioned "Applications," states that "in order to receive assistance from any municipality, the applicant or a duly authorized representative must file a written application with the overseer, except as provided in section 4304, subsection 3," i.e., the 'emergency' provision cited above. The section further provides that eligibility must be "determined solely on the basis of need."

22 MRSA § 4309, captioned "Eligibility," provides that the overseer "shall determine eligibility each time a person applies or reapplies for general assistance.... The period of eligibility must not exceed one month." Sub-section 1-B further provides that "In order to determine an applicant's eligibility for general assistance, the overseer first must seek information and documentation from the applicant."

22 MRSA § 4310, captioned "Emergency benefits prior to full verification," states that whenever an applicant claims to be in an emergency situation requiring immediate assistance to meet basic necessities, the overseer shall, pending verification, provide sufficient benefits to meet basic necessities, assuming that based on an initial interview the overseer believes the applicant will probably be eligible for assistance, and that need has been either documented or supported by other witnesses. However, in no case may the authorization for benefits thereunder exceed 30 days absent full verification of eligibility.

22 M.R.S.A. § 4311 allows DHHS to pay reimbursement to a municipality only "when the department finds that the municipality has been in compliance with all requirements" of Title 22, Chapter 1161, including the requirement that municipalities pay only eligible claimants.

22 MRSA § 4317, captioned "Use of potential resources" states that "an applicant or recipient must make a good-faith effort to secure any potential resource that may be available, including, but not limited to, any state or federal assistance program, employment benefits, governmental or private pension programs, available trust funds, support from legally liable relatives, child-support payments and jointly held resources [that] may be available to the individual."

22 MRSA § 4322 provides that DHHS shall review the administration of GA by each municipality for compliance with statutory mandates, and report the results in writing to the municipality. If the Department finds any violation, it is to provide the municipality 30 days to specify what action the city proposes to take to achieve compliance. Failure to file a plan to come into compliance exposes the municipality to civil penalties and the withholding of reimbursement until compliance is achieved.

Additionally, the Maine General Assistance Policy Manual includes the following important provisions:

**1. SECTION III. DEFINITIONS-
INCOME**

Income is defined as “any form of income in cash or in kind [including] any payments received as an annuity, retirement, or disability benefits, veterans pensions, Worker’s Compensation, unemployment benefits, benefits under a state or federal categorical assistance program, supplemental security income, Social Security and any other payments from governmental sources unless specifically prohibited by any law or regulation.”

EMERGENCY SHELTER COSTS

“A municipality may choose to consider the actual cost of an emergency shelter provided by a shelter provider as a shelter cost *up to the amount allowed by ordinance*. (Emphasis added.)

In such cases the municipality may provide general assistance to the emergency shelter provider on the following criteria have been met:

- 1) The applicant (not the shelter provider) *has completed an application* for assistance.

- 2) The applicant has been found eligible for assistance *based on criteria established in the municipal ordinance.*

Municipalities may arrange with emergency shelters for the homeless to presume eligibility for persons to whom the emergency shelter provides shelter services. Individual agreements should be on file and available for review (§ 4304(3)).

When residents of an emergency shelter apply for assistance, they must be aware that *any income or resources they have are to be utilized for current needs. The same verification of income and expenditures for the previous 30 day period and 30 day perspective income procedures are to be utilized as with other applications.*"

(Emphasis added.)

2. SECTION V. ELIGIBILITY FACTORS

"22 MRSA § 4309(1) limits the period of eligibility. The period of eligibility shall not exceed one month. The one month is the maximum period of eligibility a municipality may use in determining eligibility."

"Each time the eligibility period has expired, the applicant must have his eligibility re-determined."

"Decisions are to be rendered within 24 hours of application (§ 4304)..."

"In the event of an 'emergency' sufficient assistance to alleviate emergency should be provided until the next business day."

EMERGENCY APPLICATIONS FOR ASSISTANCE

"[T]he municipality has 24 hours to grant or deny an application...."

"It is not necessary to provide long-term assistance or a permanent solution in an emergency. Assistance of a type and amount that will

alleviate immediate threat to life and safety are that will help to alleviate any undue hardship or unnecessary costs will suffice.”

INTERIM ASSISTANCE

“Municipal General Assistance Administrators must seek authorization [for payment to the State] from each applicant who, to the Administrator’s knowledge, may be eligible for SSI, has applied for SSI, or who is waiting for benefits which may have been suspended”

Further detailed sections of the Manual describe the process by which an SSI-eligible individual’s benefits must be used to reimburse the state and municipality.

3. SECTION X. REVIEW OF MUNICIPAL ADMINISTRATION OF GENERAL ASSISTANCE.

(This section reiterates much of the statutory content of § 4323.)

“It is imperative that no [municipal GA] administrative costs are billed to the Department.”

Following review, written findings indicating program violations are to be presented at an exit conference; if the municipal administrator is not in agreement with the findings, written responses are to be sent to DHHS within 10 days, to be considered before a final determination is made by the Department.

“If a plan of correction is not filed with the Department within the thirty day period [after the 10-day comment period], the Department shall send written notification that a plan of correction has been requested, that none has been received, and that withholding [of reimbursements] will take place.”

DESCRIPTION OF VIOLATIONS

1. Eligibility determinations are being made improperly, and applications are not being processed as required.

The relevant statutory provision, § 4309, states that eligibility is to be determined “each time a person applies or reapplies for general assistance,” and that “[t]he period of eligibility must not exceed one month.” The eligibility determination process also encompasses the requirements of §4308 which require a written application except as provided in § 4304(3), and further require that eligibility be determined solely on the basis of need.

By necessary implication, an eligibility process that purports to qualify individuals for general assistance on an ongoing basis of indefinite duration violates § 4309. Similarly, the failure to arrange for the completion and proper processing of an appropriate application violates § 4308. During the course of the review it was revealed that applications taken at Portland shelters are not being completed on a monthly basis and, insofar as they are completed, are simply put into a file and stored on-site. They are never appropriately reviewed by Portland GA staff for proper eligibility determinations. During a meeting on December 9, 2013 at the Portland GA office, DHHS program manager Dave MacLean was shown a folder containing a month’s worth of abbreviated applications, none of which had been placed into the “WELPAC,” the municipality-run computer system for GA eligibility, or otherwise processed as required. As a result, the review of 90 files was effectively not probative of the current issues insofar as none of the shelter files were among those available for review.

2. The presumptive eligibility provisions of § 4304(3) are being misconstrued and misapplied to allow effectively perpetual eligibility without consideration of need or assets.

As noted above, all applications for assistance must be in writing except for those which fall within the ambit of § 4304(3), which allows for a period of presumptive eligibility for individuals in emergency shelters (but which does not purport to exclude operation of all other statutory provisions). The City of

Portland has apparently taken this exception to the general rule to mean that individuals admitted to municipal shelters are to be deemed, immediately and in perpetuity, to qualify for general assistance without respect to need or assets. Further, the City proceeds from this conclusion to seek reimbursement for all costs of running such shelters, including nonrecoverable administrative costs. This is a misinterpretation of the law.

Reading the statute as Portland apparently does violates all rules of statutory construction and would lead to absurd results. To take the position that the statutory language of § 4304(3) (included in a subsection entitled “Emergencies”) provides limitless assistance without ever requiring an actual determination of eligibility would ignore the clear legislative intent, create inconsistent results, and lead, finally to absurdity. Fundamentally, a literal reading of the presumptive eligibility exception in isolation from the statutory context would swallow the rule.

Multiple sections of the GA statute, including §§ 4308, 4309, and 4310, spell out in considerable detail the process of making application, determining eligibility, and providing emergency benefits where necessary. As a general proposition, applications must be in writing, must assess the applicant’s financial need, must produce a determination of eligibility within 24 hours, and must cover no more than a 30 day period. If § 4304(3) trumps all other portions of the law, and allows individuals limitless use of general assistance funds in the form of a subsidy to the shelter without even a determination of eligibility, all of those provisions would be pointless, and certainly lead to inconsistent results, as ‘sheltered’ applicants would be favored over all others, irrespective of need. It would in effect make such persons not *presumptively* eligible but *automatically* and *indefinitely* eligible. The very nature of the term “presumptive” eligibility suggests that it is an inherently temporary status, pending a final determination of eligibility. To contend that someone who is “presumed eligible” for any status never actually has to be determined to *be* eligible would render the very word “presumed” redundant. Had the legislature wished the statute to have the effect the City urges, it could simply have said so, and stated that all residents of

emergency shelters would be “deemed” eligible – or, more simply, “are eligible” – for general assistance. It did not.

This issue was raised with the City in April 2014, at which time it suggested that “the city’s interpretation in this regard is supported by the language of the statute,” citing as support an internal advisory letter issued by Assistant Attorney General Christina Hall to DHHS in 1996. In fact, although AAG Hall found the language of the statute at issue ambiguous, she concluded that an examination of the legislative history “supports a stronger argument for the position currently and historically taken by [the] Department [to the effect that] shelter residents must apply and be found eligible for GA in order for towns to be reimbursed for costs attributable to them.” In other words, while perhaps conceding that portions of the statute were ambiguous, the opinion ultimately concluded that the proper interpretation of the issue is the one being advanced both then and now by the Department. As you will also note, part of her rationale was that the legislative Committee rewrote the broad original Statement of Fact for the bill, to observe that the purpose of the amendment was to “clarif[y] the permission to municipalities to grant assistance to residents of emergency shelters without an application *in writing*.” This does not reflect an intention to grant assistance without an application, or without meeting other qualifications. Again, this makes perfect sense: an emergency shelter will inevitably and often receive potential applicants under circumstances where the mechanisms described in the statute for determining eligibility are unavailable. A presumption of eligibility is a reasonable stopgap measure in such circumstances. A conclusive and automatic determination of eligibility is neither reasonable nor supported by the broad purpose of the statute. The directly expressed legislative intent surely supports the Department’s interpretation.

By letter of April 18, 2014 counsel to the City contended that § 4304(3) “says only that presumptive eligibility is permissible – with absolutely no limit on the application of that presumption.” (Letter from Jennifer L. Thompson, Esq., at p. 3.) In fact, however, all statutory language is necessarily “limited” by the rules of construction, even to the extent that, as noted, “a court can even ignore the literal meaning of phrases if that meaning thwarts the clear legislative objective,”

State v. Day, *supra*, at 605. The courts will defer to an agency's interpretation of an arguably ambiguous statute so long as that interpretation is a reasonable one. *State v. McCurdy*, 2010 ME 137, 10 A.3d 636 (Me. 2010). To consider the exceptional language in § 4304(3) as providing a benefit that is both unavailable under any other portion of the statutory scheme and which would render much of that scheme superfluous is unsupportable as a matter of law.

3. The City of Portland is impermissibly submitting expenses related to operation of shelters not directly attributable to GA eligible individuals.

As a result of the practices described above, the City of Portland does not in fact individually and correctly determine the eligibility for assistance of individuals housed within the City's shelters. Instead, relying upon the contention both that it is self-evident that anyone in the shelter would qualify for general assistance, and that the State has ostensibly blessed the practice in the past, it has submitted for reimbursement the total operating expenses of such shelters, regardless of whether the resident individuals actually meet the relevant eligibility criteria.

Apart from the provisions of § 4308(3), the entire statutory scheme of the general assistance program is premised on determination of need on the part of each individual for the care of whom the municipality seeks reimbursement. For the reasons described in the preceding section, the exception permitting an emergency admission to a shelter cannot be read in isolation from the remainder of the statute, and therefore, for example, cannot negate the requirement reflected in § 4308(1) that municipalities must issue written decisions on applications within 24 hours, the requirement that a period of eligibility must not exceed one month (§ 4309) or that eligibility must be based solely on need. (§ 4317).

Nothing in either the statutory or regulatory framework of the program permits reimbursement as has been sought by Portland. Administrative costs are

not reimbursable³ nor are costs not directly attributable to individual eligibility. Where the City has failed to appropriately process individual applications through their WELPAC computer system, reimbursement is unsupported and cannot be continued.

The claim that the Department's current interpretation is said to be inconsistent with prior tacit or explicit approvals is not relevant. The suggestion⁴ that the Department could be collaterally (or otherwise) estopped from enforcing its current interpretation based on past practice is unsupportable. First, "collateral estoppel only prevents the relitigation of factual issues when the identical issue was already determined by a prior final judgment." *Kelley v. Maine PERS*, 2009 ME 27, ¶22, 967 A.3d 676 at 683-84. Since the dispute at hand reflects interpretation of law rather than factual issues, and there has been no determination of any such issues by any court, collateral estoppel is inapplicable. To the extent the City would alternatively contend that the doctrine of equitable estoppel applies, we note that the Law Court has held both that "compelling policy reasons discourage applying equitable estoppel to restrict the government from undertaking its essential functions," and "equitable estoppel requires a misrepresentation." It is thus applied only "carefully and sparingly," *State v. Brown*, 2014 ME 79, ¶20, ¶17, ¶15, 95 A.3d 82, 87-88. There is no such claim of misrepresentation here, much less the "clear and satisfactory proof" the Court requires, *id.* at ¶15. Similarly, nothing in past practice estops the Department from enforcing its rules in a different fashion prospectively. *See Astrue v. Ratliff*, 560 U.S. 586, 130 S.Ct. 2521, 2529 (2010) ("nothing about the Government's past payment practices [re: fee awards] altered the statutory text ...or estopped the Government" from revising them.) To the extent the Department's interpretation of the statute and rules is reasonable, even if not mandated, it will be upheld. *Lippitt v. Board of Certification for Geologist and Soil Scientists*, 2014 ME 42, 88 A.3d 154 (2014); *Fryeburg Health Care Center v. Department of Human Services*, 1999 ME 122, 734 A.2d 1141 (1999).

³ See discussion and rule at Manual, Section XIII.

⁴ See letter of Attorney Thompson, *supra*, at 4.

4. The City of Portland is not requiring shelter residents to use income or resources for their current needs, and is failing to consider such resources in determining 'need' as the statute requires.

As described above, § 4309 and § 4317 describe a system in which the municipality identifies all resources available to the individual, which must then be considered as bearing on the level of 'need' and thus the eligibility of the individual for assistance. It is the very essence of the general assistance program that only individuals who meet the 'need' parameters of the municipalities GA ordinance may be provided reimbursable assistance.

In the course of the present and prior reviews, DHHS has determined that the perfunctory application process conducted before individuals are lodged in the City shelters fails to comply with these requirements. While it is difficult to determine precisely how many ineligible individuals may be routinely admitted to the shelter and then, indirectly, have those costs passed on for reimbursement, the Department's review has revealed that at least a substantial number of individuals who routinely stay in shelters are clearly ineligible.

Documents provided to the Department by City employees identified the "Top 30 Stayers" in City shelters based on total bed nights. Of those 30, at least 13 were determined to have more than approximately \$20,000 in savings or checking accounts in their names. Of these, the person with the single greatest number of total bed nights was reported as of November 19, 2013 to have \$92,424 in his accounts. One other individual was reported to have as much as \$161,351 in liquid assets.

The City of Portland employs a number of individuals who act as "representative payees" for individuals who receive a number of benefits including SSI and SSDI. At least 60 of those individuals stayed at least one night at the Oxford Street shelter in 2014. Many of those had combined checking and savings accounts balances as of January 2015 amounting to as much as \$50,000.

While it is difficult on this limited information to determine the precise scope of the problem, it is clear that the City's practices with respect to admitting and retaining persons in its shelter are inconsistent with the statutory requirements that those persons demonstrate 'need' for such emergency accommodations after initial admission.

5. The City of Portland is incorrectly submitting reimbursement requests for individuals who are not United States citizens or are otherwise ineligible for state and local public benefits under 8 USC § 1621.

The City of Portland has been submitting to the Department for reimbursement general assistance amounts paid to individuals who are ineligible for General Assistance pursuant to the terms of 8 U.S.C. § 1621. The City of Portland segregated its claims for reimbursement into two groups: one group it called "non-qualified," consisting of those aliens who are not included within the eligible categories set forth in 8 U.S.C. § 1621(a), and a group it called "qualified," consisting of U.S. citizens and aliens who do fall into an eligible category under 8 U.S.C. § 1621(a). DHHS's audit reveals that the City of Portland has correctly performed the segregation of claims in the manner it has described; it has not included any ineligible aliens within the group of its "qualified" claims. It has incorrectly paid those individuals benefits, however, since it has incorrectly concluded they are eligible for benefits notwithstanding 8 U.S.C. § 1621.

REMEDIAL ACTION REQUIRED

DHHS requires that the following steps be taken to bring the City of Portland into compliance with the General Assistance statute and regulations:

1. An applicant who seeks refuge at a city shelter is, pursuant to section 4304, entitled to an initial night of presumptive eligibility, assuming that

it is impractical to process his application for General Assistance benefits in the usual fashion immediately.

2. All such persons must thereafter complete the application process within the 30 day period following their sheltered admission. For each such person determined to be eligible for General Assistance, shelter costs for such period will be eligible for reimbursement based on the "bed night rate" to be established as in Paragraph 4(a) below. If the applicant is found to be ineligible, reimbursement will be provided only for the initial night of assistance.
3. With respect to any period beyond the initial 30 days, the usual General Assistance eligibility standards must be applied. City staff must process each such applicant for eligibility through the WELPAC system as it does with non-shelter applicants.
4. The methodology to be used for current reimbursement requests for the category of "Temporary Housing (Shelter, etc.)" will be as follows:
 - a. Portland will establish a bed night rate for shelter clients not to exceed the maximum housing utility allowance for a single individual in the "heated zero bedroom" category of the Appendix C as listed in the most recently adopted General Assistance ordinance. This amount shall be prorated into a daily figure and will be the amount allowed to be requested as reimbursement for a General Assistance eligible individual staying at any municipal homeless shelter;
 - b. Portland may no longer submit reimbursement requests in the "Temporary Housing (Shelter, etc.) category based on the operating expenses of municipal shelters. Such reimbursement requests will instead be made based on the number of nights that shelter was provided for General Assistance eligible individuals at the defined bed night rates.

5. Portland must continue to determine whether applicants are eligible for state and local benefits under 8 USC § 1621 as part of its overall responsibility to determine eligibility, and must pay general assistance to eligible applicants only. Portland shall not seek reimbursement from DHHS for payments made to individuals who are not eligible for state and local public benefits under 8 USC § 1621.
6. As part of the process of determining compliance, DHHS will conduct a monthly in-depth review of Portland's shelter reimbursement requests for a minimum of one year. DHHS may elect to continue these reviews if deemed necessary to verify compliance. Upon request, Portland agrees to furnish DHHS with any requested documents reasonably needed to monitor compliance.

NOTICE


In light of the violations catalogued above, the Department is submitting this notice of the aforementioned corrections that must be made before compliance with the statute can be achieved. If the administrator is not in agreement with these findings, he or she may file a written response with the Department within 10 days of the exit conference. Such information will be considered before a final determination of noncompliance is made.

Pursuant to the General Assistance Manual Section X, if the City is found to be out of compliance following the 10 day response, it will be so notified in writing by the Department. It will have 30 days thereafter to submit a plan of correction specifically targeted to the violations found. If the plan is accepted by the Department, the City shall receive such a notice from the Department along with a notice advising that a further review will be done within 60 days. If at that subsequent review the same violations are found the Department may withhold reimbursement until compliance is achieved.

If a plan of correction is not filed with the Department within the 30 day period, the Department will send written notification to that effect and withholding will take place. If an unacceptable plan of correction is filed the Department shall so advise the City and indicate what is needed for an acceptable plan. In all respects these procedures shall be guided by and comply with the statutory provisions of § 4322.

The Department recognizes that the City of Portland disagrees with the conclusion that it is non-compliant by virtue of paying benefits to aliens who are not eligible under 8 U.S.C. § 1621(a), and that such disagreement is the subject-matter of a pending lawsuit between DHHS and the City of Portland. Pending resolution of that lawsuit, DHHS will not be paying reimbursement of claims paid to such "non-qualified" aliens, but DHHS will not be assessing any civil penalties or imposing any broader withholding remedy for the City of Portland's failure to correct this non-compliance. Assuming the lawsuit is resolved in DHHS's favor, and the City of Portland's non-compliance continues thereafter, DHHS reserves the right to assess civil penalties and impose withholding remedies from that point forward. DHHS also reserves the right to impose civil penalties or withhold all reimbursement — including reimbursement for so-called 'qualified' or 'non-qualified' claims — before resolution of the lawsuit, in accordance with law, for non-compliance unrelated to the issues of citizenship and immigration status that are the subject of that lawsuit.

The Department thanks you for your cooperation in this matter. If we can be of any assistance, please contact us at 1-207-624-4138.



DHHS General Assistance Program Manager

Date: 2/20/15

GA Administrator/Authorized representative

Date: _____

Note: your signature does not signify agreement with the review findings, but serves only to indicate that the review findings have been discussed with you.