



United States
Department of
Agriculture

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

October 4, 2019

Bethany Caputo
SNAP Administrator
RI Department of Human Services
206 Elmwood Avenue
Providence, RI 02907

Dear Ms. Caputo:

This letter serves as the Food and Nutrition Service (FNS) Northeast Regional Office's follow up to our recent site visit to validate current open findings pertaining to Supplemental Nutrition Assistance Program (SNAP) operations of the Rhode Island (RI) Department of Human Services (DHS).

FNS conducted the on-site validations on August 13-14, 2019 at the Pawtucket field office, the Providence field office, the Warwick field office, Central Scanning, and the Department of Administration's Office of Internal Audits.

Closed Findings

Through on-site case file reviews and documentation previously submitted, FNS determined the following findings are sufficient to close.

Local Program Access (LPAR)

Finding name: LPAR 17.2 Failure to appropriately issue the Notice of Missed Interview

Finding name: LPAR 17.8 Improper assignment of certification periods

Finding name: LPAR 17.13 Notices of Expiration are not sent within the required timeframe

Finding name: LPAR 17.17 Failure to issue a periodic report form

Electronic Benefit Transfer (EBT)

Finding name: EBT 17.4 FNS discovered through interviews and case file review, the State agency made (cancellation) adjustments to household accounts after the availability date, due to duplicate erroneous issuances.

Finding name: EBT 17.5 FNS reviewers visited the State's Scanning Center and observed that returned EBT cards were not maintained in a separate and secured location.

Finding name: EBT 17.9 Households' eligibility for prepared meals (restaurants meals program) were not being accurately reflected in RIBridges and therefore clients could not use benefits at authorized retailers.

Integrity (INTEG)

Finding name: INTEG 17.8 Inaccurate application of the approved Intentional Program Violation (IPV) threshold.

Finding name: INTEG 17.9 IPV claims disposed of with incorrect interpretation of “aged claims.”

Finding name: INTEG 17.15 Administrative Disqualification Hearing referrals reduced since RIBridges go-live.

Finding name: INTEG 17.21 DHS failed to develop an efficient tracking system to monitor cases referred for prosecution.

Validation Efforts

Please see the responses below that detail FNS’ inability to validate the State’s corrective action efforts. The State is required to provide a response to these findings in the November 2019 Semi-annual Corrective Action Plan (SA CAP). In addition, some of the findings below will also require an updated Corrective Action Response (CAR) Tool due to changes in the root cause. The template for the CAR will be attached for use by the State.

Local Program Access (LPAR)

Finding name: LPAR 15.1 Notice of Adverse Action (NOAA) does not comply with Federal Regulations

FNS response: This finding will remain open. During the case file reviews and review of the NOAA issued to SNAP recipients, FNS identified notices in which the decision reason is not clear. FNS acknowledges the ongoing efforts in the State to revise notices, therefore this finding will continue to be monitored through the SA CAP process.

Finding name: LPAR 17.1 Failure to follow appropriate interview scheduling procedures

FNS response: This finding will remain open. During the case file reviews and review of the case notes it was determined that in many cases it was not clearly documented how the individual was informed of their interview date or if an interview took place. Therefore this finding will continue to be monitored through the SA CAP process and any future on-site validation efforts that may be planned.

Finding name: LPAR 17.6 Failure to meet requirements for providing bilingual program materials

FNS response: This finding will remain open. During the case file reviews and review of the notices issued to SNAP recipients, FNS found that the decision reason in some cases was listed in English for individuals coded in RIBridges as having Spanish as their primary language. FNS acknowledges the ongoing efforts in the State to revise notices, therefore this finding will continue to be monitored through the SA CAP process and any future on-site validation efforts that may be planned.

Finding name: LPAR 17.7 Failure to calculate income correctly

FNS response: This finding will remain open. During the case file reviews, FNS found several cases where income was not properly calculated. In some cases, a workaround was used to add a “place holder” to the budget while a case pended due to missing verifications. In these cases an entry of \$1.00 was added to the case in order for the system to generate a request for documentation from the client. Benefits were issued with the eligibility calculation with the \$1.00 per week figure.

The SA must follow the procedures outlined in 7 Code of Federal Regulations 273.10(e)(1)(i) for determining a household’s net monthly income. The SA must provide training for all eligibility workers on the proper procedures for determining income to ensure that eligibility workers are able to identify inaccuracies in benefit calculations. The State should also conduct a comprehensive review of system functionality to identify defects that could be resulting in the incorrect benefit calculation. FNS requires an updated CAR tool. The CAR tool must detail the steps the State will take to address this finding. The SA must also provide copies of the training material that is developed and also the results of the review of system functionality.

Finding name: LPAR 17.9 Notice of Eligibility does not conform to Federal Regulations

FNS response: This finding will remain open. During the case file reviews and review of the Benefit Decision Notice issued to SNAP recipients in several cases, FNS found that the decision reasons were not clear and in some cases were not correct. FNS acknowledges the ongoing efforts in the State to revise notices, therefore this finding will continue to be monitored through the SA CAP process.

Finding name: LPAR 17.11 Failure to appropriately issue a Notice of Adverse Action

FNS response: This finding will remain open. During the case file reviews and review of the NOAA issued to SNAP recipients, FNS found in some cases that the correct notice was not sent or it did not clearly indicate the reason for case closure. FNS acknowledges the ongoing efforts in the State to revise notices, therefore this finding will continue to be monitored through the SA CAP process and any future on-site validation efforts that may be planned.

Finding name: LPAR 17.12 Failure to properly close households at the end of the certification period

FNS response: This finding will remain open. During the case file reviews, FNS found cases that remained open after the cert period closure date even though the State had not made a determination on the household's continued eligibility. This finding will continue to be monitored through the SA CAP process and any future on-site validation efforts that may be planned.

Finding name: LPAR 17.14 Failure to follow appropriate interview procedure at recertification

FNS response: This finding will remain open. During the case file reviews and review of the case notes it was determined that in many cases it was not clearly documented that a recertification interview was scheduled or took place. In one instance the recertification date was bumped out from May 2017 to May 2019 without determining eligibility. Therefore this finding will continue to be monitored through the SA CAP process and any future on-site validation efforts that may be planned

Finding name: LPAR 17.16 Failure to provide a full month's allotment for State-caused delays in processing recertifications

FNS response: This finding will remain open. The sample of cases that FNS reviewed during the on-site validation attempt did include cases that would allow us to validate this specific corrective action. We will seek to validate the corrective action through future, targeted efforts.

Electronic Benefit Transfer (EBT)

Finding name: EBT 15.2 Reconciliation and Reporting of Investigator Benefits

FNS response: FNS validated the issuance of investigator benefits for April 2, 2019 and April 25, 2019. The benefits were documented by the EBT coordinator via the EBT-03 report and reported on the FNS-46 report. However, the issuance amounts were not available in RIBridges. In order to close this finding, the State must complete

a reconciliation of the issued investigator benefits as part of the EBT reconciliation process.

Finding name: EBT 17.1 FNS discovered anomalies and invalid issuances through weekly calls with the State, interviews with SA personnel and reviews of issuance files in the EBT Admin system (FIS).

FNS response: FNS reviewed issuance data for August 9-August 12, 2019. FNS is unable to close the finding due to a lack of EBT reconciliation. Line 10 information on FNS-46 is not accurately reported. However, the background information that the EBT coordinator maintains has the correct amounts. Line 7 returns does not reconcile to AMA.

Monthly Benefit Issuance amounts on the RI EBT-03 report does not reconcile to total benefit issuance captured on the FNS-46 screen in RIBridges. Additionally, the total amounts does not reconcile to the FIS totals reported to FNS via. the AMA report.

FNS requires an updated CAR tool. The CAR tool must detail the steps the State will take to reconcile daily and monthly EBT issuances. The State must take immediate steps to address this issue.

Integrity (INTEG)

Finding name: INTEG 17.3 eDRS not checked at application and recertification

FNS response: FNS was unable to validate this finding. The State is required to provide a response to this finding in the November SA CAP.

Finding name: INTEG 17.5 The locality code and contact reported in eDRS is incorrect

FNS response: FNS was unable to validate this finding. This finding requires immediate attention. The State is required to provide a response to this finding in the November SA CAP. The State must provide not only the contact person (which was previously provided), but also ensure that this information is updated in eDRS.

Finding name: INTEG 17.6 The State is not checking eDRS for newly added household members

FNS response: FNS was unable to validate this finding. The State is required to provide a response to this finding in the November SA CAP.

Finding name: INTEG 17.14 Potential IPV cases are not being referred to the Fraud Unit

FNS response: During case file reviews FNS discovered that potential fraud referrals have increased overtime since RIBridges Go-Live. The Fraud Unit provided reports that showed an increase in these referrals.

The State is required to provide a response to this finding in the November SA CAP. FNS would like to continue to monitor this and requests that the State submit an updated fraud referrals report with the November SA CAP.

Finding name: INTEG 17.16 IPV case files are incomplete and do not contain sufficient documentary evidence.

FNS response: FNS acknowledges that the SWIFT system used to track and store IPV information currently has a lot of documentation gathered and stored by the Fraud Unit. However, during the case file reviews, FNS discovered that SNAP applications, recertifications and other documentation gathered from clients during the eligibility process and required to support IPV claims were at times missing from the case files. As a result, FNS will continue to monitor this and will keep this finding open.

The State is required to provide a response to this finding in the November SA CAP. The CAR tool must provide detailed steps the State will take to ensure applications, recertifications and other documentations gathered from clients that are needed to support IPV claims will be stored and easily accessible to the Fraud Unit.

Finding name: INTEG 17.17 DHS is not in compliance with the Federal records retention requirements

FNS response: FNS acknowledges that the SWIFT system used to track and store IPV information currently has a lot of documentation gathered and stored by the Fraud Unit. However, during the case file reviews, FNS discovered that SNAP applications, recertifications and other documentation gathered from clients during the eligibility process and required to support IPV claims were at times missing from the case files. As a result, FNS will continue to monitor this and will keep this finding open. The State is required to provide a response to this finding in the November SA CAP.

Finding name: INTEG 17.18 DHS is not in compliance with the IPV case records maintenance requirements.

FNS response: FNS acknowledges that the SWIFT system used to track and store IPV information currently has a lot of documentation gathered and stored by the Fraud Unit. However, during the case file reviews, FNS discovered that SNAP applications, recertifications and other documentation gathered from clients during the eligibility process and required to support IPV claims were at times missing from the case files. As a result, FNS will continue to monitor this and will keep this finding open. The State is required to provide a response to this finding in the November SA CAP.

Treasury Offset Program (TOP)

Finding name: TOP 14.5 Failure to properly determine delinquency date

FNS response: During case file reviews FNS determined that in some cases the system does determine delinquency date accurately. However, FNS was not able to view all the possible case scenarios as the State continues to pilot the claims functionality.

The State is required to provide a response to this finding in the November SA CAP. FNS will continue to monitor this through onsite reviews of the Claims functionality pilot cases.

Quality Control (QC)

The QC Integrity Review on-site validation has been addressed under separate cover.

Thank you for RI's effort in resolving findings through the Corrective Action process. Please provide the revised CAR tools for the findings listed in the **Validation Efforts** section with your November SA CAP due on November 1, 2019. If you have any questions please contact Maria Volpe at 617-565-6390 or by email at Maria.Volpe@usda.gov.

Sincerely,



Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

Enclosure

cc: Iwona Ramian
Maureen Donnelly
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