



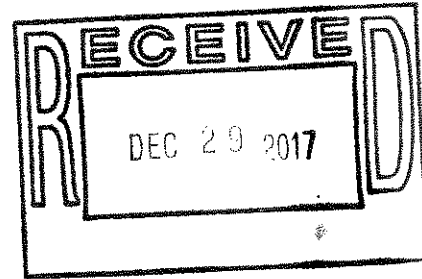
**United States
Department of
Agriculture**

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

DEC 26 2017



Courtney Hawkins, Director
Department of Human Services
Louis Pasteur Building
57 Howard Avenue
Cranston, RI 02920

Dear Director Hawkins:

The Food and Nutrition Service (FNS) is in receipt of Rhode Island's (RI) Federal Fiscal Year (FFY) 2018 Supplemental Nutrition Assistance Program (SNAP) Management Evaluation (ME) Plan submitted on October 5, 2017.

The State Target Areas for Management Evaluations memo for FFY 2018 (attached), identifies five (5) national target areas and eight (8) at-risk program areas to be considered. Before FNS can approve your plan, please review the following FNS comments and submit a revised plan that details how the State intends to conduct the FFY 2018 reviews regarding the following:

Able-Bodied Adults Without Dependents (ABAWDs)

ABAWDs is listed as a national target area and an at-risk program area. RI should consider the Town of Richmond an at-risk area due to the expiration of the Statewide ABAWD waiver as of August 31, 2017. The revised plan must address:

- How RI intends to review ABAWD households in Richmond;
- How RI intends to conduct interviews related to ABAWDs; and
- Training activities and materials that will be provided to staff relating to new ABAWD policy and procedures, particularly those procedures pertaining to the communication of ABAWD requirements to potential ABAWD households.

E&T Programs that leverage third party funds, or operate in pledge States, or make significant changes in providers or funding categories

How does the State monitor the Intermediary Agency (LISC) to ensure that all proper protocols for third party partnerships are being followed?

Recipient Claims Management, Treasury Offset Program (TOP) and Program Integrity

These areas are listed as at-risk program areas. FNS highly recommends that the State assess these areas as a result of the implementation of the new eligibility system RIBridges and the move of the Fraud/Recipient Integrity unit to the Department of Administration (DOA). Below are some recommendations for the assessment. Once reviewed, a revised plan must be submitted to properly address these areas during the FFY 2018 State ME reviews.

- Recipient Claims Management and TOP

The State must come into compliance with regulations at 7 CFR 273.18. In order to do so, FNS recommends a few actions be considered by the State. Please note that this does not preclude the State from coming up with additional or more efficient ways to come into compliance. These recommendations are not all-inclusive and do not mean there are not additional actions that are required by the State to come into compliance.

- Assess the overall claims operations and the structure of the Claims Unit, including staffing, operations, training, supervision, and policy knowledge and expertise;
- Focus on designing, developing, testing and improving the claims functionality in RIBridges; determine whether RIBridges is capable of tracking claims from date of discovery to establishment; determine whether the system has the capacity to track the entire claims backlog; determine whether a manual claim can be created with an establishment date prior to the 9/13/16 system implementation; and assess the recoupment logic built in RIBridges to ensure recoupment is consistent and accurate;
- Assess collections and posting of such collections;
- Review and update the State's Claims Management Plan as a follow-up to your assessment.

- Recipient Integrity/Fraud

The State must come into compliance with regulations at 7 CFR 273.16. Due to the move to DOA, FNS believes that roles and responsibilities have not been clearly defined. FNS is concerned that there are no standard operating procedures or manuals that govern the operations of the State's fraud activities as it now stands. FNS is recommending a few actions to be taken by the State. This does not preclude the State from coming up with additional or more efficient ways to come into compliance. These recommendations are not all inclusive and do not mean there are not additional actions that are required by the State to come into compliance.

- Clearly define the roles and responsibilities of DOA and DHS as they pertain to fraud efforts. Please explain the business process and procedures that are in place to ensure that the Fraud Unit will operate according to all Federal requirements. Be sure to address the following:
 - The front end detection requirement for fraud;
 - Identify who will enter disqualification information into eDRS and RIBridges once the functionality is in production;

- Identify who will be the liaison with DHS to provide policy training and information when changes occur that affect SNAP fraud;
 - Assess the tasks and activities that occurred prior to the Fraud Unit moving. If these continue to be required by regulations, or for the effective running of the Unit, please explain the business process and procedures needed to ensure these activities are understood and implemented;
 - Identify the process for referring claims from the field and identify the criteria that constitute an acceptable fraud referral.
- Assess the development, testing and implementation of RIBridges IPV functionality. Determine whether the IPV functionality works in RIBridges to accurately disqualify recipients;
 - Assess the overall Fraud Unit, including staffing, and training of investigators on SNAP policy and RIBridges.

Thank you for your attention to this important process. Please provide your response within thirty (30) days of receipt of this letter. If you have any questions regarding this report please contact Maria Volpe at 617-565-6390 or Maria.Volpe@fns.usda.gov.

Sincerely,



Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Kimberly Brito
William O'Donnell
Maureen Donnelly
Kimberly Nikolaidis
Iwona Ramian