



**United States
Department of
Agriculture**

APR 16 2018

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

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

Dear Director Hawkins:

Enclosed is the Federal Fiscal Year (FFY) 2018 Food and Nutrition Service (FNS) review report on Supplemental Nutrition Assistance Program (SNAP) operations of the Rhode Island (RI) Department of Human Services (DHS). During the review, FNS evaluated Able-Bodied Adults Without Dependents (ABAWD).

On-site review activities were conducted at the Wakefield Local Office, Central Office and at an E&T provider, Crossroads RI, during the week of February 12-14, 2018. An exit conference was held on February 14, 2018.

The enclosed report contains a formal assessment of program operations with a summary of work, findings and required corrective actions, observations, and suggestions. This report identifies corrective actions that must be implemented within 60 days to meet regulatory requirements per 7 Code of Federal Regulations 275.3 and 275.17.

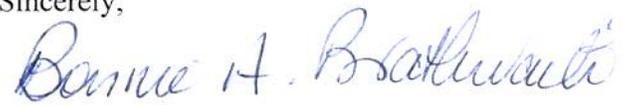
Please find attached the Corrective Action Response (CAR) Tool. This must be completed for each finding and submitted to this office within 60 days from the date of this letter. The CAR Tool must outline specific corrective action steps that are proposed or that have been implemented and identify any long range corrective actions.

Please note that open findings from prior reviews must be addressed immediately to avoid escalation and possible further action. If you require technical assistance, as always, my staff is available to assist you in whatever manner necessary.

We look forward to continuing our work with DHS to support program access and ensure program integrity. We would like to express our gratitude to all DHS staff that assisted in the review preparation and execution.

If you have any questions or concerns about the enclosed report or any aspect of this review, please contact Maria Volpe at 617-565-6390 or by email at Maria.Volpe@fns.usda.gov.

Sincerely,

A handwritten signature in blue ink that reads "Bonnie A. Brathwaite". The signature is written in a cursive style with a small "2" above the "t".

Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

Enclosure

cc: Iwona Ramian
Maureen Donnelly
Kimberly Nikolaidis

FFY 2018

Rhode Island Supplemental Nutrition Assistance Program

Able-Bodied Adults Without
Dependents (ABAWD)
Management Evaluation Report

February 2018



Supplemental
Nutrition
Assistance
Program

Putting Healthy Food
Within Reach

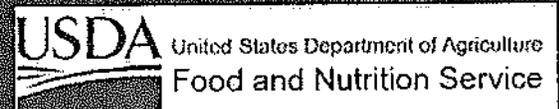


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I. Executive Summary

Able-Bodied Adults Without Dependents (ABAWD) Supplemental Nutrition Assistance Program Rhode Island 2018

The Food and Nutrition Service (FNS) Northeast Regional Office (NERO) reviewed and evaluated Rhode Island's (RI) Supplemental Nutrition Assistance Program (SNAP) operations. The functional areas for the Federal Fiscal Year (FFY) 2018 review conducted during the week of February 12, 2018 – February 14, 2018 targeted the following: Able-Bodied Adults Without Dependents (ABAWD).

The review provided the FNS Regional Office staff the opportunity to observe and evaluate the State agency's (SA) processes and procedures for complying with the requirements outlined in FNS regulations, handbooks, and policy. Additionally, the review was an opportunity for regional staff to provide technical assistance regarding new regulations and policy interpretations that may be needed.

Information included in this report is the result of observations, interviews, case reviews, and assessment of documents provided to FNS. This report details the findings, required corrective actions, observations and recommendations of NERO.

A written response to the corrective actions detailed in the report must be submitted within sixty (60) calendar days of the date of this report. The response must include a description of the corrective action steps for the findings including implementation time frames and supporting documentation as necessary. Additional details on the requirements for the corrective action response can be found at the end of this report. Although not required by regulation, responses to FNS Observations and Suggestions are encouraged.

II. Definitions

Corrective Action Response (CAR): Actions that are proposed or taken by a State agency to respond to a finding of noncompliance with Federal regulations, FNS instructions, and/or policy memoranda. The term 'Required Corrective Action' is the element of the ME report that conveys the action(s) that must be taken by the State agency to correct the noncompliance with Federal regulations, FNS instructions, and/or policy memoranda and prescribed by FNS for the State agency to move into compliance with Federal requirements and policy.

Finding: Identification of non-compliance with program regulations, FNS instructions, and/or policy memoranda, and/or other authoritative documents that must be corrected by the State agency. Each finding is associated with a required corrective action.

Functional Areas: Specific areas or components of program operations and administration performed by the State agency that are examined and evaluated in a ME/FMR such as certification and eligibility, program access, financial management, and local agency oversight.

Management Evaluation (ME): Periodic compliance assessment of State agency or local program operations and administration resulting in a report of findings, observations, and noteworthy initiatives.

ME Report: Formal, comprehensive report of the ME review that typically includes findings, required corrective actions, observations, suggestions, and noteworthy initiatives.

Observation: Identification of a weakness in program operations or management that is not in violation of program regulations, FNS instructions, policy memoranda, and/or authoritative documents. Each observation is associated with a suggestion.

Open Finding: A finding in which the corrective action has not been implemented by the State agency and/or validated by FNS.

Repeat Finding: A finding that is identical to a previously cited, closed finding that is discovered at the same State agency in at least one of the reviews conducted within the continuous two-year period immediately preceding the ME.

Required Corrective Action: A statement in the ME report that conveys the action(s) that must be taken by the State agency to correct noncompliance with Federal regulations, FNS instructions, and/or policy memoranda. Required corrective actions are prescribed by FNS but may have input by the State agency. The State agency is required to provide a Corrective Action Response to FNS' required corrective action. All required corrective actions must be validated by FNS to ensure the State agency has implemented the corrective action and that the corrective action has addressed the violation prior to closing the applicable finding(s).

III. Acronyms

ABAWD	Able-Bodied Adults without Dependents
CAP	Corrective Action Plan
CAR	Corrective Action Response
CFR	Code of Federal Regulations
DHS	Department of Human Services
E&T	Employment and Training
FFY	Federal Fiscal Year
FNS	Food and Nutrition Service
IR	Interim Report
LISC	The Local Initiatives Support Corporation
LPAR	Local Program Access Review
ME	Management Evaluation
NERO	Northeast Regional Office
NOAA	Notice of Adverse Action
NOE	Notice of Expiration
NOMI	Notice of Missed Interview
RI	Rhode Island
SA	State Agency
SNAP	Supplemental Nutrition Assistance Program
TA	Transitional Assistance
TANF	Temporary Assistance for Needy Families
TBA	Transitional Benefits Alternative
USDA	United States Department of Agriculture

IV. Introduction

FNS NERO conducted a review of the RI Department of Human Services (DHS) SNAP operations during the week of February 12, 2018.

An entrance conference was conducted on Monday, February 12, 2018 at the DHS Central Office. The review was conducted at the Central Office, Wakefield local office and included a site visit to Crossroads RI for a discussion of ABAWD requirements. This report is based on the results of the on-site review of case files and interviews with members of RI DHS SNAP Administrative staff, local field office staff as well as a provider within RI's SNAP Employment and Training (E&T) program. An exit conference was held on Wednesday, February 14, 2018 to provide a summary of the work performed during the review and to discuss any additional documentation needed, anticipated findings, observations and required corrective actions. FNS

provided DHS with the case review summary results for all cases that were reviewed and identified by FNS to have issues.

V. Objective

The main objective of this review was to determine State agency compliance with Federal statutory law and implementing regulations, policies and directives applicable to the Federally-funded SNAP. This SNAP Management Evaluation (ME) review focused on specific target areas identified in the FFY 2018 target memo. Full details and explanations of this target area are explained below in section VI – Scope.

VI. Scope

Able-Bodied Adults Without Dependents Review

The primary purpose of the ABAWD review is to determine compliance with the Federal rules that govern time limited participation for ABAWDs in SNAP. As part of the ABAWD review, FNS staff focused on DHS' ability to identify, track, serve and report on its ABAWD population.

The on-site review included an ABAWD policy discussion with State SNAP program and policy staff. FNS also conducted interviews with eligibility technicians and supervisory staff at the Wakefield local field office on overall program operations and regulatory compliance. Additionally, FNS staff conducted case reviews in the Wakefield office to assess the application of ABAWD requirements on SNAP participants.

This review also included a review of how work programs and/or workfare in the State, including SNAP (E&T), function to allow individuals to fulfill the ABAWD work requirement and maintain eligibility under the time limit. FNS recognizes that DHS has not yet established directly targeting ABAWD recipients within its E&T program. As such, FNS staff visited one provider that is currently part of the State's E&T Program. FNS staff and DHS staff met with representatives of Crossroads RI to provide an overview of the ABAWD requirements and clarification on how it could serve ABAWDs by offering qualifying components.

Methodology

The review was conducted in accordance with FNS and SNAP ME Guidance and also utilized procedures and requirements set forth in the SNAP ME review guide for ABAWD MEs.

- Data Collection

The review team selected for review a random sample of cases identified as recipients of SNAP residing in the Town of Richmond from September to November 2017.

The review team was provided an additional list of 63 cases closed due to the ABAWD time limit while on site. The review team selected cases from this sample as well to review.

The FNS review team worked with local office and central office staff to review the case files in the State’s eligibility system, RIBridges. The FNS review team utilized a case file review protocol from the most recent ME guidance to ensure each case was reviewed in a consistent manner.

- Interviews & Questionnaires

The review team conducted an interview on site with a local office eligibility staff member and a supervisory staff member.

Questionnaires for the ABAWD review were forwarded to the State prior to the review week and were used for follow-up questions with the Central office staff during the week of February 12, 2018.

- Case File Reviews

The purpose of the case file review was to determine if the State is processing cases in compliance with Federal program requirements for ABAWDs and to verify processes and procedures discovered during interviews and observations.

Type of Cases	Random Sample	Total # of cases Reviewed
ABAWD	30	30
Total	30	30

VII. Findings and Required Corrective Actions

Able-Bodied Adults Without Dependents (ABAWD)

Finding ABAWD18.1(new): The State’s tracking system does not effectively track for three ABAWD countable months in a 36-month period.

Citation: 7 CFR 273.24(b)(3)

Background: Per Federal regulation, ABAWDs subject to the time limit that are not granted a 15 % exemption or reside in a waived area can only receive three months of SNAP benefits in a 36-month time period. FNS reviewers noted in several cases that ABAWDs received benefits in excess of three countable months. In some cases, months were counted against the ABAWD time limit when the case showed documentation of exemptions. Several cases lacked verification or case notes to reflect exemption status or whether or not the individual was meeting the work

requirement. Through interviews with State policy staff, it's the review team's understanding that the State is relying on its vendor to provide a monthly report detailing ABAWDs subject to the time limit. A list was provided prior to the State's transition off its Statewide waiver in August, but any further lists were not provided until preparation for this review began in December. For months, September, October, November; no list was provided to DHS detailing ABAWDs subject to the time limit.

FNS observed that when RIBridges does track countable months, it is overriding previous months with the most current count. For example if in September the client has three countable months when an eligibility technician goes back to the month of July the system still shows three countable months. The State's systems' ability to track is inconsistent and the way that information and data exist within the system is unclear and confusing. Also, due to the State's inability to properly track, the State has not been able to notify FNS how many 15% exemptions have been used for the individuals who have received benefits since the State implemented the time limit.

FNS observed that eligibility workers either do not have access to the ABAWD summary or time limit screen, or lack familiarity with the system to access the appropriate screen.

Also during the review, the FNS review team observed one case that appears to have reported an address change via the customer portal. The individual moved in to the unwaived area; however, the system still displayed the client as exempt and no countable months appear to be displayed in the system.

Required Corrective Action: The State's tracking system must effectively track for three ABAWD countable months in a 36-month period. The State is required to act on information known to the State that was provided by the client, including information via the customer portal. The SA should consider staff training and system automation to avoid further errors.

Finding ABAWD18.2(new): The State is not properly screening people against exemptions to the ABAWD time limit.

Citation: 7 CFR 273.24(c)(2)(ii)

Background: Per Federal regulation, the time limit does not apply to individuals who meet certain exemption criteria. While conducting case file reviews, FNS reviewers found that when an indicator for homelessness was applied to an individual's case, it was being used as an exemption for unfit for work when assessing whether or not the time limit applied to the individual. Additionally, FNS found that SA staff believe that homelessness is an exemption by itself. While it is to the State's discretion as to whether or not chronic homelessness or addiction to drugs or alcohol can serve as an indicator of an individual's unfitness for work, homelessness or addiction to alcohol or drugs alone cannot be used as a categorical exemption from the ABAWD time limit.

FNS reviewers identified several cases on site where clients were inappropriately identified as an ABAWD, and coded as "work required", but documentation in the case file showed the client had met an exemption. Additionally, the system hierarchy used for exemptions is not pulling the

most permanent exemption associated with the case (for example: places work hours over child in the household).

Required Corrective Action: The SA must discontinue using homelessness as an exemption from the ABAWD time limit. While these household circumstances can be used as indications of an individual's unfitness for work, they alone are not exemptions from the ABAWD time limit. If the SA would like to use homelessness and other indicators of unfitness, the SA must develop procedures and training to ensure appropriate case documentation to support the decision based on the person being unfit to work

The SA must also ensure that those who qualify for either an ABAWD or a SNAP work exemption are not subjected to the ABAWD time limit. The State must include training for all staff (field and call center) on how to appropriately identify ABAWDs as well as appropriate procedures for screening and applying exemptions. The SA is strongly encouraged to work with its vendor to ensure a hierarchy of coding exemptions exists based on the permanence of the exemption.

Finding ABAWD18.3 (new): The State is not consistently informing ABAWDs of program rights and responsibilities.

Citation: 7 CFR 273.2(e)(1) and April 10, 2017 FNS Guidance "Requirements for Informing ABAWDs"

Background: Per Federal regulation and detailed in the April 10, 2017 FNS guidance, "*The State must inform ABAWD and potential ABAWD households of the time limit, exemption criteria (including exemptions from the general work requirements), and how to fulfill the ABAWD work requirement, as these rules and responsibilities are fundamental to their eligibility for SNAP. At a minimum, this must take place during the eligibility interview.*"

While conducting case file reviews and completing interviews with State staff on site, FNS reviewers discovered that it was unclear as to how ABAWD rights and responsibilities are communicated to clients. In case file reviews of active ABAWD cases, there was no documentation to indicate that individuals had been informed of their rights and responsibilities associated with their ABAWD status, exemptions, time limit, and work requirements. Additionally, through staff interviews, FNS discovered that there is limited understanding of the ABAWD requirements. It is important that households are made aware of the policy because of its impact on their access to benefits. Through case file review and staff interviews, it appears that staff are not trained on how to properly notice appropriate households nor on proper case narrative documentation.

Required Corrective Action: The SA must inform applicants of program rights and responsibilities. This includes informing potential ABAWD households of the time limit, exemption criteria, and how to fulfill the ABAWD work requirement. This must take place, at a minimum, during the eligibility interview. Providing eligibility technicians with proper training that includes a script, checklist, or other templates to address ABAWD rules and screen clients for exemptions is a best practice. The SA must implement a process to document oral communication of the ABAWD time limit, exemptions and work requirements. Furthermore, if the State chooses to inform applicants of their rights and responsibilities through noticing, the

language should be consistent and should include all information that ABAWDs are required to report prior to the Notice of Approval.

Finding ABAWD18.4(new): 15% exemptions are not accurately reported in the FNS-583 quarterly reports.

Citation: 7 CFR 273.24(i), 7 CFR 273.7(c)(9)(iv)

Background: Per Federal regulation, The State agency will track the number of exemptions used each month and report this number to the regional office on a quarterly basis as an addendum to the quarterly Employment and Training Report (Form FNS-583). When conducting case file reviews, FNS reviewers found that the current process for tracking 15% exemptions is a manual process that is labor-intensive and could be error prone. This manual process entails information being handled by one SNAP staff member who is then manually assigning 15% exemptions on a monthly basis. Additionally, this information is not being captured or reported in the State's FNS-583 quarterly reports, because there has not been a FNS-583 posted in several quarters required by 273.7(c)(8). It is our understanding that it is the State's intention to assign the 15% exemption at this time to ABAWDs residing in the Town of Richmond for all months the ABAWD was subject to the time limit. As stated above, FNS understands that the State is relying on its vendor to provide a monthly list of ABAWDs subject to the time limit; however, the SA reports that the first list was received in August 2017 and the second one was not received by the State until preparation for the FFY 2018 ABAWD review announcement was sent to the State in December 2017. Without a regularly generated list from the vendor, the State is not aware who on the active caseload is subject to the time limit, therefore, cannot assign 15% exemptions per the State's policy.

Required Corrective Action: The SA must implement a system to properly track 15% exemptions that have been assigned. The SA should complete system updates to properly track when 15% exemptions are being applied to an individual's case in an effort to accurately report 15% exemptions in the SA's FNS-583 quarterly reports. If a system update is not yet feasible and SA staff should record the 15% exemptions in a separate spreadsheet. The 15% exemptions must be tracked monthly.

Finding ABAWD18.5: The State is not properly advising households of their reporting requirements.

Citation: 7 CFR 273.2 (e)(1)

Background: Per Federal regulations at 7 CFR 273.2(e)(1) state, "*The interviewer must advise households of their rights and responsibilities the interview, including the appropriate application processing standard and the households' responsibility to report changes.*" While conducting staff interviews on site, FNS reviewers noted that clients were not being properly advised of the reporting requirements through interviews with staff and through the notices. Since RI operates a simplified reporting system in lieu of the change reporting requirements, the SA can only require clients to report if income exceeds the monthly gross income limit for the household size or if work hours for ABAWDs subject to the time limits fall below 20 hours per week.

It is important that the households know what they need to report and when. FNS reviewers noted that the DHS staff did not have a proper understanding of the policy as it relates to ABAWDs and the reporting requirements.

Required Corrective Action: The SA must properly notice clients of their reporting requirements. The SA should provide training to staff focusing on the reporting requirements as it pertains to ABAWDs . The SA must include language in its notices that properly conveys the reporting requirements.

Finding ABAWD18.6 (new): The State is not appropriately identifying out-of-State countable months

Citation: 7 CFR 273.2(f)(1)(xiv)(B)

Background: Per Federal regulation, the SA is required to establish a process to appropriately identify out-of-State countable months if there is an indication of accruing months in another State. FNS identified one case in which the client had a Massachusetts address listed in the State's system, but there were no case notes or documentation to suggest the State explored out-of-State countable months. It does not appear that the State staff are aware of this requirement. This requirement is important for the State to be able to properly identify to protect the integrity of the program and to provide proper access to eligible households.

Required Corrective Action: The SA must verify the number of countable months an individual has used in another State if there is an indication that the individual participated in that State. The State must develop procedures for verifying out-of-State countable months and to provide staff training to ensure appropriate understanding of this requirement under ABAWD rules.

Finding ABAWD18.7 (new): The State is inappropriately applying the time limit for a group of individuals in the State residing in a waived area

Citation: 7 CFR 273.24(f), 7 CFR 273.24(b)(1)(ii)

Background: Per Federal regulation, States are granted waivers to exempt certain areas of the State subject to the ABAWD regulations. FNS learned about a case through an advocate in which the client's case was terminated due to accruing three countable months; however, the client resided in a waived area. After further questioning, the SA shared with FNS, a list of 63 cases statewide that accrued countable months and closed due to the ABAWD time limit even though the household resided in a waived area. It is important for individuals that are eligible for benefits to continue to receive and maintain access to their benefits. FNS learned through interviews with the State, that the eligibility system does not have the ability to assign addresses to certain areas of the State. It appears this issue is the reason why some households were considered subject to the time limit.

Required Corrective Action: The SA must cease applying countable months and terminating cases due to the ABAWD time limit for persons not subject to the time limit. The State must identify the root cause of the system issue causing the inappropriate termination of benefits and must restore benefits to each of the 63 identified cases. Additionally, the State's system should be able to track each household's address against approved areas of the State's waiver.

VIII. Observations and Suggestions

Able-Bodied Adults Without Dependents (ABAWD):

Observation 1: The review team observed that the State SNAP E&T providers are not familiar with ABAWD policy. The Local Initiatives Support Corporation (LISC) and their sub-recipients have not received adequate training on ABAWD policy as it relates to qualifying components, the work requirement and what information should be reported to DHS. The review team conducted a meeting with Crossroads RI, an E&T provider, LISC, and DHS. The review team discussed ABAWD policy and how best an E&T provider could assist ABAWDs with meeting the ABAWD work requirement and report participation to DHS.

Suggestion 1: The SA should continue to collaborate with LISC and the E&T providers prior to the expiration of the current ABAWD waiver in September 2018 and in preparation for the additional cities and towns that will become subject to the ABAWD time limit. FNS also suggests that DHS offer training specific to ABAWD policy to both LISC and other E&T providers focusing on good cause and exemptions to the time limit. FNS notes that training on ABAWD policy was delivered by FNS and SA staff to E&T providers on April 5, 2018, but encourages the SA to provide additional trainings.

Observation 2: The review team noted that the SA has yet to develop materials to advise community partners of the implementation of the ABAWD time limit.

Suggestion 2: The SA should put a process in place to meet with and to train community partners on the ABAWD requirements. FNS also encourages the State to provide all paper applications and documents to FNS for review and comment prior to document finalization.

Observation 3: The review team observed a significant lack of knowledge and understanding of the ABAWD regulations at the eligibility technician level.

Suggestion 3: The SA should improve and enhance the training curriculum currently in place related to ABAWD policy. It is imperative that eligibility staff are prepared to make correct determinations of eligibility as it pertains to households and ABAWD policy.

Observation 4: The review team noted several cases where one benefit issuance was

comprised of more than one month. In review of these specific cases, it was impossible to review the circumstances used to make eligibility determinations for each month. Specific to ABAWD policy, it is critical that staff be able to review the household circumstances on a month by month basis. The review noted that for each benefit issuance ABAWD status codes were present, but it was not possible to know which month(s) the exemption applied to. It appears each case has a history page that provides information on a monthly bases, but access and familiarity with that specific page varied with SA staff.

Suggestion 4: The SA staff should have access to the circumstances used for eligibility determinations for individual months.

Observation 5: The review team noted cases where the benefit issuance for an issuance month indicated multiple profiles making it difficult to determine a specific audit trail for case actions. This was a common occurrence in many cases where a case action could be viewed by a State staff member and also by a unique profile (MUBEDBCDLY).

Suggestion 5: The SA's system should include an audit trail to include ability to account for who actually processed benefits for each month.

IX. Open Findings

Finding #LPAR17.1 (formerly L.1 included in FFY2017 Combined LPAR Review)
(Open): Notice of Adverse Action does not comply with Federal regulations
Citation: 7 CFR 273.13(a)(2)

Background: FNS reviewers identified multiple cases in which the Notice of Adverse Action did not conform to Federal regulations. Federal regulations at 7 CFR 273.13(a)(2) states "The notice of adverse action shall be considered adequate if it explains in easily understandable language: The proposed action; the reason for the proposed action; the household's right to request a fair hearing; the telephone number of the SNAP office (toll-free number or a number where collect calls will be accepted for households outside the local calling area) and, if possible, the name of the person to contact for additional information; the availability of continued benefits; and the liability of the household for any overissuances received while awaiting a fair hearing if the hearing official's decision is adverse to the household. If there is an individual or organization available that provides free legal representation, the notice shall also advise the household of the availability of the service."

FNS reviewers identified multiple NOAAs that informed the household that it was closed for the incorrect reason including:

- Failure to return Recertification instead of Interim Report;
- Failure to return Interim Report instead of Recertification; and,
- Failure to provide documentation instead of over income.

Required Corrective Action: SA must ensure the language included on the NOAA is compliant with 273.13(a)(2) by explaining in easily understandable language an accurate reason for the proposed action. System issues appear to account for the majority of the NOAA issues; however, in some instances the worker might have taken an incorrect action in the system that resulted in an inaccurate NOAA. The State must provide an update on system defects related to NOAAs. The State must provide a comprehensive training for all eligibility staff on correct notice procedures in RIBridges.

Status: This finding results originally from the FFY 2015 Newport LPAR review. The SA's CAR indicated the notice issues would be addressed with the new RIBridges system. FNS is aware that a new NOAA was put into production when RIBridges went live. FNS identified the same issues with the notice from the previous review; therefore, this will remain an open finding until the State provides documentation to FNS validating that the finding has been addressed. FNS also acknowledges receipt of the most recent CAR on March 27, 2018 and plans to respond under separate cover.

Finding LPAR17.2 (formerly #A.3 included in FFY2017 LPAR Combined Review)
(Open): Case file documentation does not support eligibility decisions and benefit-level determinations
Citation: 7 CFR 273.2(f)(6)

Background: FNS reviewers identified numerous cases in which the case files insufficiently documented the details of a SNAP benefit determination or case processing action by the eligibility workers. The case files were missing initial applications, recertifications, verifications and case notes necessary to confirm the accuracy of statements or information provided. In some cases, the case record included documents that were improperly indexed; therefore they were not readily identifiable by the eligibility worker. For example, reviewers identified one recertification application that was indexed as an appeals-related document and, in a separate case, a recertification application that was indexed as a birth certificate.

The level of detail found within the case notes also varied significantly from one case to the next. A few cases included detailed notes while the majority had no case notes and several had very limited information. Federal regulations at 7 CFR 273.2(f)(6) state, "*Case files must be documented to support eligibility, ineligibility, and benefit level determination. Documentation shall be in sufficient detail to permit a reviewer to determine the reasonableness and accuracy of the determination.*" This includes documentation related to determinations made at initial certification, recertification, and any changes made during the certification period that affect the household's eligibility and/or benefit level. State agencies must be able to support the SNAP eligibility of all households with adequate case file documentation. Additionally, since DHS uses statewide task-based case processing, standardization of case notes will improve efficiency and accuracy as multiple workers handle different tasks pertaining to a case at different times. Detailed case notes are a critical piece of documentation to substantiate case actions.

Required Corrective Action: The SA must establish standard case management procedures to ensure the case files are documented to support eligibility, ineligibility and/or benefit level. The

SA must ensure that all case documentation is contained in RIBridges and properly indexed so that eligibility workers may act on changes or make eligibility determinations in a timely manner. The SA must ensure that workers use consistent, detailed case notation to support case actions. The State's CAR should include an example of a standard case documentation and any guidance or training materials provided to eligibility workers.

Status: During the FFY 2018 ABAWD review, FNS reviewed several cases where the documentation provided within the case record did not adequately justify the eligibility determination made by the SA. FNS also acknowledges receipt of the most recent CAR on March 27, 2018 and plans to respond under separate cover.

Finding LPAR17.3 (formerly #A.8 included in FFY2017 LPAR Combined Review)
(Open): Improper assignment of certification periods
Citation: 7 CFR 273.10(f)(1)

Background: FNS reviewers identified four cases in which RIBridges listed the incorrect certification period. In one case the certification period was extended beyond the 12 month maximum for non-elderly/disabled households. Federal regulations at 7 CFR 273.10(f) state, *"The State must certify each eligible household for a definite period of time...The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period and as specified in paragraphs (f)(1) and (f)(2) of this section."* In three other cases, in which all the household members were elderly or disabled, RIBridges had assigned a four year certification period, extending the certification period beyond the maximum. Federal regulations at 7 CFR 273.10(f)(1) state, *"The State agency may certify for up to 24 months households in which all adult members are elderly or disabled."*

Required Corrective Action: The SA must meet all regulatory requirements by assigning the correct certification periods to appropriate SNAP households. The State's CAR must outline strategies, including training and/or system enhancements, to ensure the correct assignment of SNAP certification periods for all households.

Status: During the ABAWD review, FNS noted evidence of cases that had certification periods extended beyond the 12 month maximum for non-elderly/disabled households. FNS also acknowledges receipt of the most recent CAR on March 27, 2018 and plans to respond under separate cover.

Finding LPAR17.4 (formerly #A.10 included in FFY2017 LPAR Combined Review)
(Open): Untimely processing of interim reports resulting in invalid closures
Citation: 7 CFR 273.12(a)(5)(iii)(B)

Background: FNS reviewers found cases in which the interim reports were submitted timely by the client, but the cases were subsequently closed due to delays in case processing. Federal regulations at 7 CFR 273.12(a)(5)(iii)(B) state, in part, *"In selecting a due date for the periodic report, the State agency must provide itself sufficient time to process reports so that households that have reported changes that will reduce or terminate benefits will receive adequate notice of action on the report in the first month of the new reporting period."* FNS is aware through

weekly CAP calls and data reports that the State currently has a backlog of unprocessed interim reports.

Required Corrective Action: The SA must ensure that all interim reports are processed within the required timeframes. If eligible, recipients have the right to receive their benefits on their regularly scheduled issuance date. Similarly, households must be sufficiently notified of a decrease of benefits or ineligibility.

Status: During the ABAWD review, FNS noted evidence of cases that had interim reports submitted but not processed timely or at all by the SA. FNS also acknowledges receipt of the most recent CAR on March 27, 2018 and plans to respond under separate cover.

**Finding LPAR17.5 (formerly #A.12 included in FFY2017 LPAR Combined Review)
(Open): Failure to properly close households at the end of the certification period
Citation: 7 CFR 273.14(a)**

Background: FNS reviewers identified at least two cases where the households continued to participate beyond their assigned certification period without an eligibility determination. Federal regulations at 7 CFR 273.14(a) state, "*No household may participate beyond the expiration of the certification period assigned in accordance with 273.10(f) without a determination of eligibility for a new period. The State agency must establish procedures for notifying households of the expiration date, providing application forms, scheduling interviews and recertifying eligible households prior to the expiration of certification periods.*" In one case, the application was processed without a recertification on file, and in the other, the household continued to receive benefits beyond its certification period. FNS is aware, through our weekly CAP calls, that the State has systematically kept households open with unprocessed recertifications and that there is a backlog of unprocessed recertification applications.

Required Corrective Action: The SA must develop procedures to ensure that no households participate beyond the expiration of their assigned certification period.

Status: During the ABAWD review, FNS noted evidence of cases that had certification periods extended beyond the 12 month maximum for non-elderly/disabled households. FNS also acknowledges receipt of the most recent CAR on March 27, 2018 and plans to respond under separate cover.

X. Corrective Action Response

As stipulated in 7 CFR 275.3 and 275.16, RI DHS is required to provide a written response identifying its corrective actions outlined in this ME report. The CAR is due within **60 calendar days** of the date of this ME report. Please complete each element of the CAR tool detailed below for each finding:

Finding Naming Convention:

FNS will assign each finding a unique identifier following the naming convention below in the ME report.

- The type of review: LPAR, SPAR, MESYS, ABAWD, ET, SNAPED, INTEG, QC, CAPER, EBT, QCSTATS, CLAIMS, TOP
- The last two digits of the FFY the review took place in where the finding was identified: e.g. if a finding resulted from a review in FFY 2017, (17) would be the first two digits in the finding name.
- Finally, a number (1, 2, 3, 4) assigned by FNS that would stay with the finding until it's closed. For instance, if a State has a combined LPAR/ABAWD review in FFY 2019, the name for the findings would be LPAR 19.1, LPAR 19.2 and so on for the LPAR and ABAWD 19.1 and so on for the ABAWD review.

Finding Language:

FNS will provide the language for each finding in the CAR tool that corresponds with the Finding name provided.

Finding Evaluation:

The State is to conduct its own evaluation of the finding to include a review of the regulations and guidance pertaining to the finding. The State should evaluate the magnitude of the deficiency. Is it a systemic issue affecting a large portion of the case load or a minimal affect on a small portion of cases? Please comment on the geographic nature of the finding as well (Statewide concern vs. localized).

Root Cause Analysis:

The State should conduct a root cause analysis of the finding. The State should consult the background section of FNS's report on that specific finding, but not solely rely on it. The FNS review team is only on site for a limited time, and cannot be expected to identify completely the root cause of an issue. The State should number the root causes, because in many cases, there will be more than one root cause. The cause(s) could potentially include eligibility systems issues, training of eligibility staff, notice language, policy interpretation, etc.

CA Steps & Timeline:

The State would then complete the Corrective Action steps for each root cause. Please use the same numbers for each root cause in the section as well; e.g. root cause #1 is addressed by CA step #1. Each numbered step should thoroughly address each root cause. The State should anticipate steps that might not be documented or assessed. For instance, if the root cause to the finding is strictly systems related, the State should consider if a systems change were to take place, would that result in a need to conduct training for eligibility staff to ensure the State operates within compliance. If a root cause requires more than one Corrective Action step, the State should name those Corrective Action steps 1A, 1B, and so on. For instance, the root cause may be a systems issues, the CA steps could be #1A- fix systems issues, #1B- provide appropriate training to eligibility staff.

Date of Completion:

The State would provide the exact or expected date of completion for each Corrective Action step. Please use the same numbers for each root cause and Corrective Action step. The State should provide at a minimum, the month and year, the Corrective Action step is expected to be completed.

Monitor & Point of Contact:

For each Corrective Action step and root cause, the State should detail who is in charge of monitoring the step and what activities will take place to ensure implementation of the Corrective Action.

Documentation:

The State should detail the documentation required to validate the Corrective Action for each finding, if applicable. The documentation itself could be attached to the response, or provided later, but the detail of the document can be included in the table. For instance, if an eligibility system change is required, FNS would want to review the systems change request which could be attached to the response. In the tool, the State would briefly detail what documentation is being provided (or anticipated) and what root cause/Corrective Action step it addresses. To further stress here, FNS is not expecting actual supporting documents to be included in the tool, but merely a description of each attachment. For example, if a JIRA ticket #4 is meant to address a needed systems change related to tracking ABAWDs in a State's eligibility system, the actual JIRA ticket could be attached to the response, but in the CAR tool, a bullet could be added stating *JIRA #4 addresses needed systems change related to tracking ABAWDs*.

Finding Name:		
Finding Language:		
Finding Evaluation:		
Root Cause Analysis:	1. -	2. -
CA steps & timeline:	1. -	2. -
Expected Date of Completion	1. -	2. -
Monitor & Point of Contact	1. -	2. -
Documentation	1. -	2. -

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

As stipulated in 7 CFR 275.3 and 275.16, RI is required to provide a written response identifying its corrective actions outlined in this ME report. The Corrective Action Response (CAR) is due within **60 calendar days** of the date of this ME report. Please complete each element of the CAR tool detailed below.

Finding Naming Convention

FNS will assign each finding a unique identifier following the naming convention below in the ME report.

- The type of review: LPAR, SPAR, MESYS, ABAWD, ET, SNAPED, INTEG, QC, CAPER, EBT, QCSTATS, CLAIMS, TOP
- The last two digits of the FFY the review took place in where the finding was identified: e.g. if a finding resulted from a review in FFY 2018, (18) would be the first two digits in the finding name.
- Finally, a number (1, 2, 3, 4) assigned by FNS that would stay with the finding until it's closed.

For instance, if a State has a combined LPAR/ABAWD review in FFY 2019, the name for the findings would be LPAR 19.1, LPAR 19.2 and so on for the LPAR and ABAWD 19.1 and so on for the ABAWD review.

Finding Language:

FNS will provide the language for each finding in the CAR tool that corresponds with the Finding name provided.

Finding Evaluation:

The State is to conduct its own evaluation of the finding to include a review of the regulations and guidance pertaining to the finding. The State should evaluate the magnitude of the deficiency. Is it a systemic issue affecting a large portion of the case load or a minimal effect on a small portion of cases? Please comment on the geographic nature of the finding as well (Statewide concern vs. localized).

Root Cause Analysis:

The State should conduct a root cause analysis of the finding. The State should consult the background section of FNS's report on that specific finding, but not solely rely on it. The FNS review team is only onsite for a limited time, and cannot be expected to identify completely the root cause of an issue. The State should number the root causes, because in many cases, there will be more than one root cause. The cause(s) could potentially include eligibility systems issues, training of eligibility staff, notice language, policy interpretation, etc.

CA Steps & Timeline:

The State would then complete the Corrective Action steps for each root cause. Please use the same numbers for each root cause in the section as well; e.g. root cause #1 is addressed by CA step #1. Each numbered step should thoroughly address each root cause. The State should anticipate steps that might not be documented or assessed. For instance, if the root cause to the finding is strictly systems related,

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the State should consider if a systems change were to take place, would that result in a need to conduct training for eligibility staff to ensure the State operates within compliance. If a root cause requires more than one Corrective Action step, the State should name those Corrective Action steps 1A, 1B, and so on. For instance, the root cause may be a systems issues, the CA steps could be #1A- fix systems issues, #1B- provide appropriate training to eligibility staff.

Date of Completion

The State would provide the exact or expected date of completion for each Corrective Action step. Please use the same numbers for each root cause and Corrective Action step. The State should provide at a minimum, the month and year, the Corrective Action step is expected to be completed.

Monitor & Point of Contact:

For each Corrective Action step and root cause, the State should detail who is in charge of monitoring the step and what activities will take place to ensure implementation of the Corrective Action.

Documentation:

The State should detail the documentation required to validate the Corrective Action for each finding, if applicable. The documentation itself could be attached to the response, or provided later, but the detail of the document can be included in the table. For instance, if an eligibility system change is required, FNS would want to review the systems change request which could be attached to the response. In the tool, the State would briefly detail what documentation is being provided (or anticipated) and what root cause/Corrective Action step it addresses. To further stress here, FNS is not expecting actual supporting documents to be included in the tool, but merely a description of each attachment. For example, if a JIRA ticket #4 is meant to address a needed systems change related to tracking ABAWDs in a State's eligibility system, the actual JIRA ticket could be attached to the response, but in the CAR tool, a bullet could be added stating *JIRA #4 addresses needed systems change related to tracking ABAWDs.*

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.1
Finding Language:	The State's tracking system does not effectively track for three ABAWD countable months in a 36-month period.
Finding Evaluation:	
Root Cause Analysis:	1. - 2. -
CA steps & timeline:	1. - 2. -
Expected Date of Completion	1. - 2. -
Monitor & Point of Contact	1. - 2. -
Documentation	1. - 2. -

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.2
Finding Language:	The State is not properly screening people against exemptions to the ABAWD time-limit.
Finding Evaluation:	
Root Cause Analysis:	1.- 2.-
CA steps & timeline:	1.- 2.-
Expected Date of Completion	1.- 2.-
Monitor & Point of Contact	1.- 2.-
Documentation	1.- 2.-

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.3	
Finding Language:	The State is not consistently informing ABAWDs of program rights and responsibilities.	
Finding Evaluation:		
Root Cause Analysis:	1.-	2.-
CA steps & timeline:	1.-	2.-
Expected Date of Completion	1.-	2.-
Monitor & Point of Contact	1.-	2.-
Documentation	1.-	2.-

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.4	
Finding Language:	15% exemptions are not accurately reported in the FNS-583 quarterly reports.	
Finding Evaluation:		
Root Cause Analysis:	1.-	
	2.-	
CA steps & timeline:	1.-	
	2.-	
Expected Date of Completion	1.-	
	2.-	
Monitor & Point of Contact	1.-	
	2.-	
Documentation	1.-	
	2.-	

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.5
Finding Language:	The State is not properly advising households of their reporting requirements.
Finding Evaluation:	
Root Cause Analysis:	1.- 2.-
CA steps & timeline:	1.- 2.-
Expected Date of Completion	1.- 2.-
Monitor & Point of Contact	1.- 2.-
Documentation	1.- 2.-

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.6	
Finding Language:	The State is not appropriately identifying out-of-State countable months	
Finding Evaluation:		
Root Cause Analysis:	1.-	2.-
CA steps & timeline:	1.-	2.-
Expected Date of Completion	1.-	2.-
Monitor & Point of Contact	1.-	2.-
Documentation	1.-	2.-

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

Finding Name:	ABAWD 18.7
Finding Language:	The State is inappropriately applying the time limit for a group of individuals in the State residing in a waived area
Finding Evaluation:	
Root Cause Analysis:	1.- 2.-
CA steps & timeline:	1.- 2.-
Expected Date of Completion	1.- 2.-
Monitor & Point of Contact	1.- 2.-
Documentation	1.- 2.-