



**United States  
Department of  
Agriculture**

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

**AUG 23 2017**

Dear Director Hawkins:

The Food and Nutrition Service (FNS) appreciates Rhode Island's cooperation as FNS continues to monitor Supplemental Nutrition Assistance Program (SNAP) concerns that have emerged as a result of the implementation of RIBridges. FNS understands that the Department of Human Services (DHS) is committed to improving system functionality, and is making strides in identifying and fixing system defects, and ensuring program access. However, FNS remains concerned that issues arising from the implementation of RIBridges have likely resulted in the over-issuance of benefits to a significant portion of the SNAP caseload.

This letter is a follow up to the March 3, 2017, letter, which placed DHS on notice that FNS was investigating potential instances of over-issuances related to the new eligibility system, and reiterated to DHS to suspend the establishment of any new claims since the roll-out of RIBridges. As provided in Section 13(b) of the Food and Nutrition Act, the State agency is required to collect any over-issuance of benefits provided to a SNAP household. However, if the over-issuance is the result of a major systemic error by the State agency, under Section 13(b)(5), FNS is required to establish a claim in the amount of the over-issuance against the State and FNS may prohibit the State agency from collection of the over-issuances from households.

Through site visits, data analysis, and communication with the State following the rollout of RIBridges, FNS has identified a number of instances where DHS did not comply with SNAP statutes and regulations, resulting in over-issued benefits to a substantial number of households. These appear to be largely the result of systemic errors associated with the eligibility system. To date, the following instances have been identified:

- Recertification applications that were not closed;
- Households whose certifications were left open because of unprocessed recertifications and interim reports;
- Households who received the Heating and Cooling Standard Utility Allowance (HCSUA) based on Low-income Home Energy Assistance Program (LIHEAP) payments that were not received;
- Improper recertification procedures in September and October;
- Benefits issued to ineligible individuals or households because the State did not run electronic data matches; and

- Duplicate accounts established with duplicate payments made either electronically or manually issued through the Electronic Benefits Transfer (EBT) administrative terminal.

System fixes must be implemented promptly to ensure that households receive only the benefits for which they are eligible.

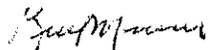
Section 13(b)(5)(B)(i) of the Food and Nutrition Act of 2008, as amended, requires DHS to provide all information requested by the Secretary concerning the over-issuance of benefits to households. FNS has already been in communication with DHS on some of these occurrences and has asked the State to begin to enumerate the size and scope of particular identified incidents of potential over-issuances. FNS will have additional information requests in the future as we continue to monitor and examine the functionality of RIBridges. FNS expects DHS to undertake appropriate analyses in order to respond to all FNS' information requests with accurate and timely reports. While DHS will be responsible for data analysis in response to FNS' information requests, FNS will offer technical assistance to DHS and work with the State to verify submitted reports.

Once FNS has a complete and accurate representation of all over-issued benefits erroneously provided by DHS, FNS will make a determination on how to proceed regarding the over-issued benefits. DHS should understand that the size of the potential State claim may be significant, given the number of households likely affected and the period of time over which the over-issuances may have occurred.

Until a final determination is made, FNS is reiterating to RI DHS to suspend establishment of new claims and all collection efforts against households for any claims established after the implementation of RIBridges. Collection can continue for only those claims that were previously established in INRhodes and converted successfully in RIBridges. Additionally, any system defects detected with the overpayment system in RIBridges must be timely fixed so that overpayments and collections can be properly managed, tracked and reported.

We appreciate your commitment to ensuring program access and integrity for all SNAP applicants and recipients. We will continue to work closely with you and your team to provide technical assistance and validate efforts taken as you progress with corrective actions. If you have any questions or wish to discuss this further, please contact Bonnie Brathwaite at (617) 565-6397.

Sincerely,



Kurt Messner  
Regional Administrator  
USDA Food and Nutrition Service

cc: Yvette Mendez  
Iwona Ramian