



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

Northeast Region

10 Causeway St.  
Room 501  
Boston, MA 02222

**AUG 15 2018**

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

Dear Director Hawkins:

This letter serves as the Food and Nutrition Service (FNS) Northeast Regional Office's (NERO) response to Rhode Island (RI)'s Corrective Action Response (CAR) on June 28, 2018. This CAR relates to the FNS Management Evaluation (ME) on Supplemental Nutrition Assistance Program (SNAP) which focused on Able-Bodied Adults Without Dependents (ABAWD) conducted from February 12 - 14, 2018.

### **LONG TERM CORRECTIVE ACTION**

The CAR sufficiently addressed the findings listed below, but Corrective Action steps have not yet been fully implemented or validated. These findings can transition to the State's semi-annual Corrective Action Plan unless otherwise specified.

#### ***Finding: ABAWD18.1***

The State's tracking system does not effectively track for three ABAWD countable months in a 36-month period.

***FNS Response:*** FNS is available to provide technical assistance and to review documents as they become available for training on all ABAWD regulations.

#### ***Finding: ABAWD18.2***

The State is not properly screening people against exemptions to the ABAWD time limit.

#### ***Finding: ABAWD18.3***

The State is not consistently informing ABAWDs of program rights and responsibilities.

***FNS Response:*** For both ABAWD 18.2 and 18.3 please refer to documents provided on May 25, 2018 and July 3, 2018. As a reminder, per Federal regulations and guidance, States are required to verbally notice all ABAWDs and potential ABAWDs of the time limit, exemptions, and the work requirement.

#### ***Finding: ABAWD18.5***

The State is not properly advising households of their reporting requirements.

***FNS Response:*** Since RI operates a simplified reporting system in lieu of the change reporting requirements, the State 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. The State must ensure that this policy is included in all SNAP and ABAWD training so that households are aware of the factors affecting their continued eligibility for receipt of SNAP benefits.

***Finding ABAWD18.6***

The State is not appropriately identifying out of-state countable months.

***FNS Response:*** When an ABAWD applies and there is an indication that the individual has participated in another State, the current State must verify the number of countable months in the other State in accordance with 273.2(f)(1)(xiv)(B). States have discretion concerning how they verify this information. States may choose to use established information exchange agreements, or may choose to develop special means by which to exchange information on an ABAWDs countable months. Please also reference the email with guidance sent to the State on 8/6/2018.

**FINDINGS NOT SUFFICIENTLY ADDRESSED**

The CAR did not sufficiently address the findings listed below. Please see FNS' comments and questions below for each finding. Please respond within **20 days** of this letter by updating the CAR tool for each of these findings in the appropriate sections.

***Finding: ABAWD18.4***

The 15% exemptions are not accurately reported in the FNS-583 quarterly reports.

***FNS Response:***

***Evaluation:*** Please include more detail on how the State uses the lists provided by the vendor to identify ABAWDs that would be granted 15% exemptions. It's FNS' understanding that the State relies on its vendor to produce the AB-001 report, which details all ABAWDs subject to the time limit for a given month. The State then applies 15% exemptions to cases per DHS' policy.

***Root Cause Analysis:*** DHS's CAR tool states that the first report (RIB-52962) was provided on 5/25/18, with the second report (AB-001) scheduled for completion in August 2018. Given that DHS relies heavily on the vendor generated list, FNS is concerned that the frequency detailed in the CAR will not allow DHS to track countable months and apply 15% exemptions timely. How can the State accurately report its use of 15% exemptions each month if the State is not receiving an accurate list of ABAWDs subject to the time limit each month?

*Corrective Action Steps:* FNS requires the State provide additional details regarding the frequency for the generation of this list and to confirm completion in August 2018. Please include steps that take into consideration limitations on the tracking of ABAWDs in the State.

***Finding ABAWD18.7***

The State is inappropriately applying the time limit for a group of individuals in the State residing in a waived area.

***FNS Response:***

*Evaluation:* The State's CAR tool did not adequately evaluate this finding. Are households that reside in waived areas still accruing countable months? FNS understands that the vendor was able to provide a report that detailed all 63 cases that closed incorrectly. Has the State requested that same report be produced again? It's FNS' understanding that the system fix to address the inability to identify towns/cities was implemented in early August 2018. If that's the case, how has this issue only been limited to 63 cases? Is there concern that households that have accrued countable months, and reside in a town not exempt by the ABAWD waiver starting September 1, 2018 might be adversely affected?

*Root Cause Analysis:* What limited this issue to only 63 cases and how has this issue not persisted since the system functionality wasn't addressed until a system's fix in August 2018?

*Corrective Action Steps:* Please consider revisions made to the evaluation and root cause analysis section when revising the corrective action step section.

Thank you for the State's effort in resolving findings through the Corrective Action Process. If you have any questions please contact Maria Volpe at [Maria.Volpe@fns.usda.gov](mailto:Maria.Volpe@fns.usda.gov) or 617-565-6390.

Sincerely,



Bonnie Brathwaite, Director  
Supplemental Nutrition Assistance Program  
Northeast Region

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