



Rhode Island Department of Human Services
Supplemental Nutrition Assistance Program
57 Howard Avenue, Louis Pasteur Building, Cranston, RI 02920

September 10, 2018

Bonnie Brathwaite, Director
U.S. Department of Agriculture
Supplemental Nutrition Assistance Program
Northeast Region
10 Causeway Street
Boston, MA 02222

RE: RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response (CAR) to August 15, 2018 FNS Letter

Dear Director Brathwaite,

In response to your letter dated August 15, 2018 regarding the state's FFY18 ABAWD CAR, please find updates below.

Finding Name:	ABAWD 18.4
Finding Language:	15% exemptions are not accurately reported in the FNS-583 quarterly reports.
FNS Response: Finding Evaluation:	Please include more detail on how the State uses the lists provided by the vendor to identify ABAWDs that would be granted the 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 reports 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?
CA steps & timeline:	1. DHS will receive and review a monthly list of all SNAP active individuals with details of ABAWD status and exemptions, including 15% exemptions.

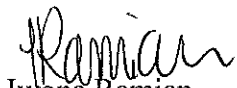
	This list is generated by the 2 nd day of each calendar month. DHS staff can filter list based on individuals receiving time limited benefits for the month, and apply 15% exemption as necessary under DHS policy.
Expected Date of Completion	1. RIB-74857, which is the ticket to track the development and deployment of the monthly ABAWD report is scheduled for release in September 2018. It is currently undergoing additional UAT.
Monitor & Point of Contact	1. Kim Nikolaidis, SNAP Assistant Administrator
Documentation	1. RIB - 74857

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
FNS Response: Finding 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?
CA Steps & timeline	1. DHS will receive and review list of all active SNAP participants per month since September 1, 2017 to ensure that no individuals in the area covered by the ABAWD waiver have countable months. This review was completed in August 2018, before the new ABAWD waiver became effective on September 1, 2018, which increased the un-waived area to 12 communities. No individuals with countable months inside waived area have been found. The root cause of the 63 cases being assigned countable months when they were outside of the Richmond area is linked to issue of zip codes and villages being used as communities. The RIBRidges system had been using zip codes and villages for addresses and did not require a city or town for the residence address. The zip codes and address combinations associated

	with those 63 cases were incorrectly associated with the town of Richmond. After the discovery of these cases incorrectly being closed, these individuals were contacted and their cases were made whole.
Expected Date of Completion:	1. Completed August 2018
Monitor and Point of Contact:	1. Kimberly Nikolaidis, Assistant SNAP Administrator
Documentation:	DHS deployed an address update in the Bridges system, which now requires the residence address to have one of RI's 39 cities and towns. RIB-67768 was deployed on 8/3/18 which updated the existing SNAP cases and required any new SNAP cases to have one of the 39 cities/towns. This has allowed the waived and non-waived areas to be defined by cities/towns, and villages are no longer an acceptable address field for residence. The RIB-52962 report, which looked for individuals with countable months, was re-run after the address conversion and no cases have been identified as having countable months with a residence address outside the Richmond area. RIB-72040 was deployed on 8/3/18 which updated the system to include the additional 12 un-waived ABAWD areas effective 9/1/2018.

Thank you for your continued collaboration and assistance. If you have any additional questions or concerns about this ABAWD CAR, please do not hesitate to contact me at Iwona.Ramian@dhs.ri.gov.

Sincerely,



Iwona Ramian
SNAP Administrator, RI DHS

cc: Courtney Hawkins, Director, RI DHS
Kimberly Brito, Deputy Director, RI DHS
Maureen Donnelly, Associate Director, Operations, RI DHS
Kimberly Nikolaidis, Assistant SNAP Administrator, RI DHS
William O'Donnell, SNAP Corrective Action Officer, RI DHS
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