



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

October 5, 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,

As discussed and requested, RI DHS is updating its September 10, 2018, response to your letter dated August 15, 2018 regarding the state's FFY18 ABAWD CAR. Specifically, updates have been made to the Finding Evaluation, Root Cause Analysis, and CA steps & timeline, to provide clarity and additional details.

Finding Name:	ABAWD 18.4
Finding Language:	15% exemptions are not accurately reported in the FNS-583 quarterly reports.
Finding Evaluation:	The RI Bridges system was not correctly programmed to accept and track cases or individuals who were given the ABAWD 15% exemption. Since September 1, 2017, when RI lost its statewide ABAWD waiver and one small community became subject to the 3-month time limit, the system vendor provided lists of individuals receiving countable months to the SNAP Assistant Administrator, who then manually entered the exemptions into the RI Bridges system,
Root Cause Analysis:	From September 1, 2017 through August 30, 2018, RI only had one city/town that was subject to the ABAWD 3-month time limit. The population of that town is relatively low, and the number of individuals who were ABAWDs and subject to the time limit was minimal. The tracking of those individuals and providing them with a manual 15% exemption was doable given the affected population. However, as of September 1, 2018, twelve more cities/towns lost the ABAWD waiver and become subject to the 3-month time limit. The population of ABAWDs without any exemptions and thus subject to the time limit increased to approximately 1,200. This

	increase in individuals who could be given the 15% exemption is no longer able to be manually managed. As such, the tracking of ABAWDs who may be granted the 15% exemption and the actual number of 15% exemptions granted must be tracked through the system.
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. The report includes summary data, including the number of exemption used that month, and the detailed individual level data supporting the summaries. The report will also provide detailed individual-level data for the last 3 preceding months, allowing DHS staff to validate changes in ABAWD statuses from month to month. Furthermore, DHS is working on building a unit to serve customers affected by the ABAWD policies and provide resources and case management services to clients seeking workforce training and employment opportunities. This staff will be trained on ABAWD policies, including properly granting 15% exemptions.
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
Finding Evaluation:	Since September 1, 2017, the date RI lost its statewide ABAWD waiver, 63 individuals living in areas still waived were inappropriately closed. As stated above, the vendor provided DHS with a list of all individuals active on SNAP since September 1, 2017, who received a countable month. The Department was able to confirm that number of individuals residing in waived cities/towns who were closed as a result of ABAWD time limit was limited to 61 individuals.
Root Cause Analysis:	This issue was due to the fact that residence addresses in RIBridges included village names and did not contain the name of one of the 39 cities/towns in RI. Unfortunately, villages in RI sometimes span across multiple cities/towns.

	<p>Richmond, the town who lost its ABAWD waiver on September 1, 2017, is one of those towns that has multiple villages which has areas that are located in another town. The system identification of residence addresses in the town of Richmond was mapped by using town/city, village, and zip code. Unfortunately, this was not a perfect system and those addresses that include village names or had a mismatch of data in the address such as a different zip code, were inaccurately mapped as being in Richmond even though they were not. Additionally, updates to addresses when individuals moved between waived and non-waived areas, were not accurately being tracked in the system functionality and thus countable months continued even when move to a waived area occurred.</p>
<p>CA Steps & timeline</p>	<ol style="list-style-type: none"> 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. The list can be filtered by the city/town name. 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, but after the RIB-67768 ticket which limited city/town residence address field to one of the 39 cities/towns. No individuals with countable months inside waived area have been found. The root cause of the 63 cases being assigned 3 countable months when they were outside of the Richmond area is linked to issue of zip codes and villages being used as communities. The RI BRidges 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. As mentioned, the city/town field in the residence address area of the RI Bridges system is now limited to one of the 39 cities/towns. Moving forward this will ensure that each individual is properly mapped to the correct city/town they reside in. The tables for the waived/non waived area were also updated in August 2018, with the proper mapping to one of the 39 cities/towns. Staff manually updated all residence addresses for individuals in the 13 un-waived cities/towns that had a village name that could be in more than one city/town before this address system fix. Moving forward, all residence addresses with village names will be updated during recertification process to align with one of the 39 cities/towns in RI.
<p>Expected Date of Completion:</p>	<ol style="list-style-type: none"> 1. Completed August 2018
<p>Monitor and Point of Contact:</p>	<ol style="list-style-type: none"> 1. Kimberly Nikolaidis, Assistant SNAP Administrator

Documentation:	<p>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.</p> <p>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.</p>
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Thank you for the opportunity to supplement our original CAR response and your continued collaboration and assistance. If you have any additional questions or concerns about this, 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
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