



**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

OCT 05 2018

Dear Director Hawkins:

This letter serves as the Food and Nutrition Service (FNS) Northeast Regional Office's (NERO) response to Rhode Island's (RI) Corrective Action Response (CAR) on September 11, 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.

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 attached. For each of these findings the State must review the questions included by FNS and include updated responses in the corresponding Evaluation, Root Cause Analysis and Corrective Action Steps sections.

Finding: ABAWD18.4

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

FNS Response:

Evaluation: Please include more details on how the State uses the lists provided by the vendor to identify ABAWDs that would be granted 15% exemptions. It's FNS's 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's policy.

Root Cause Analysis: DHS's CAR tool states that the first report (RIB-52962) was provided on May 25, 2018, 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 or 617-565-6390.

Sincerely,



Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Iwona Ramian
Maureen Donnelly
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