



**United States
Department of
Agriculture**

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

NOV 05 2018

Iwona Ramian, SNAP Administrator
Department of Human Services
206 Elmwood Ave, Room 9
Providence, RI 02907

Dear Ms. Ramian:

The Food and Nutrition Service (FNS) is in receipt of Rhode Island's (RI) Federal Fiscal Year (FFY) 2019 Supplemental Nutrition Assistance Program (SNAP) Management Evaluation (ME) Plan submitted on October 22, 2018.

The State Target Areas detailed in the ME memo for FFY 2019 identified four (4) national target areas and five (5) at-risk program areas to be considered. Before FNS can approve your plan, please review the following FNS comments and submit a revised plan that details how the State intends to conduct the FFY 2019 reviews regarding the following:

National Target Areas

Recipient Integrity Module 2: Data Matching and Card Replacement

FNS acknowledges the State's plan to conduct a review of this targeted area utilizing the Recipient Integrity Module 2: Data Matching and Card Replacement guide. Please submit the schedule for this review, once it is available. FNS would like to conduct a ME Systems review by shadowing the State ME team during this review.

SNAP-Ed

SNAP-Ed is one of the four national target areas that must be reviewed by State Agencies in FFY 2019. The ME plan does not mention DHS' intention to review the SNAP-Ed program as instructed in the 2019 Target Memo. The State ME plan must detail how DHS is going to monitor the SNAP-Ed program through the State ME process, including any review tools that will be used. Please submit this to FNS as a part of the revised FFY 2019 State ME Plan.

State At-Risk Target Areas

EBT Administrative Terminal System Security

FNS acknowledges the State's plan pertaining to EBT Administrative Terminal System Security; however, the plan does not adequately target the at-risk area.

FNS encourages the State to consider evaluating the following components of EBT system security. Review components include, but are not limited to those listed below:

1. The controls in place to ensure the segregation of system operations functions from reconciliation duties.
2. The State agency's Security Program for MIS systems should include a periodic risk analysis that addresses the following EBT issues:
 - EBT system vulnerability to theft and unauthorized use;
 - Separation of duties between those responsible for EBT operations and those responsible for EBT reconciliation;
 - Completeness and timeliness of the reconciliation system;
 - Vulnerability to tampering with or creating household accounts;
 - Erroneous posting of issuances to household accounts;
 - Manipulation of retailers' accounts such as creation of false transactions or intrusion by unauthorized computer users;
 - The controls in place to monitor User IDs and passwords; and
 - Monitoring the inventory of unissued cards.

For additional information on testing requirements, please refer to the System Testing rule at 7 CFR 277.18. Please submit a revised approach to evaluating EBT Administrative Security as a part of the revised FFY 2019 State ME Plan.

Able-Bodied Adults Without Dependents (ABAWD)

FNS encourages the State to refer to the *ABAWD Review Guide* (attached) for suggestions on how the State should conduct the review. Please note that the plan details should not include details outlined in the *Program Access Guides* as referenced in the original plan submission.

The amended ABAWD review schedule and plan must ensure that the ABAWD cases sampled and reviewed are reflective of all affected cities and towns that are no longer covered by the ABAWD waiver. It is FNS' understanding that the two offices scheduled for FFY 2019 reviews, Providence and Woonsocket, do not regularly assist applicants and recipients residing in any of the 13 non-waived areas.

FNS encourages the State to use and adapt the *Review Tools* information contained in the attached guide for use with the ABAWD Case File Reviews, ABAWD interviews with State and Local Agency Staff and ABAWD interviews with Contractors or Alternate State Agencies associated with DHS.

Recipient Claims Management/Treasury Offset Program

FNS acknowledges the State's increased focus on this area. FNS remains concerned that the functionality is not operational for this key aspect of SNAP program integrity and is available to assist and continue working with the State through the monthly CCRU onsite meetings to address the claims and TOP deficiencies. FNS is hopeful

that this at-risk area will be operational in FFY 2019. We will continue to work with the State on all areas within the Claims Action Plan that was developed as a tracking tool to monitor the issues surrounding claims management. The Claims Action Plan will continue to evolve as new issues are discovered and existing issues are resolved.

Thank you for your attention to this important process. Please provide your response within thirty (30) days of receipt of this letter. If you have any questions regarding this letter please contact Maria Volpe at 617-565-6390 or Maria.Volpe@fns.usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Bonnie Brathwaite', with a long horizontal flourish extending to the right.

Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Courtney Hawkins
Maureen Donnelly
Kim Brito
Kimberly Nikolaidis
William O'Donnell