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Office of Inspector General

New Hampshire's Compliance with SNAP Certification of Eligible Households Requirements

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TO: Audrey Rowe
Administrator
Food and Nutrition Service

ATTN: Mark Porter
Director
Office of Internal Controls, Audits and Investigations

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: New Hampshire's Compliance with SNAP Certification of Eligible Households Requirements

The attached report presents the results of an engagement to assess selected aspects of New Hampshire's compliance with the Supplemental Nutrition Assistance Program (SNAP) regulations. The assessment focused on compliance with Code of Federal Regulations Title 7 Part 273, Certification of Eligible Households (7 CFR 273).

TFC Consulting, Inc. (TFC), an independent licensed Certified Public Accounting firm, was contracted by the Department of Agriculture (USDA), Office of Inspector General (OIG) to conduct an agreed-upon procedures engagement at New Hampshire and provide FNS with recommendations to enhance program efficiency and effectiveness. The contract required TFC to perform the engagement in accordance with U.S. generally accepted government auditing standards (GAGAS). In connection with the contract, we reviewed TFC's report and related documentation and inquired of its representatives. Our review of TFC's report was different from an audit in accordance with GAGAS and was not intended to enable us to express, and we do not express, an opinion on New Hampshire's compliance with 7 CFR 273, Certification of Eligible Households. TFC is responsible for the enclosed agreed upon procedures and recommendations report, May 19, 2016. However, our review of TFC's audit documentation disclosed no instances in which TFC did not comply, in all material respects, with GAGAS.

TFC reported that New Hampshire did not always comply with SNAP regulations related to Social Security Numbers, Recertification, Students, Work Provisions and Determining

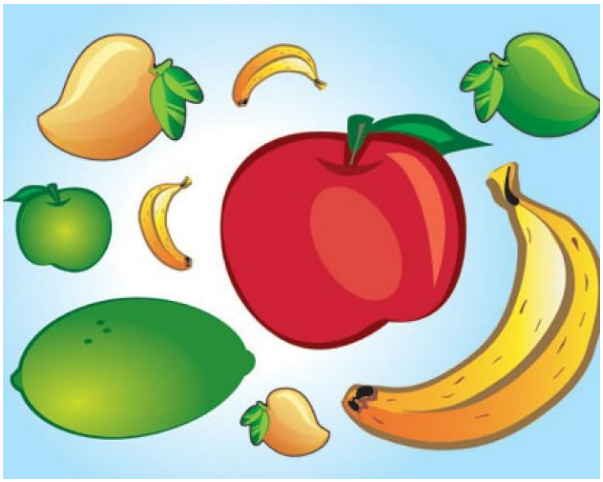
Household Eligibility and Benefit Levels. FNS concurred with TFC's recommendations and OIG accepted management decision on the report's seven recommendations.

Please note that the regulation requires final action to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than OCFO, please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciated the courtesies and cooperation extended to us by members of your staff during TFC's fieldwork and subsequent discussions. This report contains publically available information and will be posted in its entirety to our website (http://www.usda.gov/oig) in the near future.

TFC Consulting, Inc. Report on Applying Agreed-Upon Procedures Engagement for the USDA Office of the Inspector General to Assess the State of New Hampshire's Compliance with 7 CFR, Part 273 - Certification of Eligible Households

Final



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TFC Consulting, Inc.
9901 Belward Campus Dr., Suite 165
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May 19, 2016

Independent Accountant's Report on Applying Agreed-upon Procedures

TFC Consulting, Inc. (TFC), an independent licensed Certified Public Accounting firm, was contracted by the Department of Agriculture (USDA), Office of Inspector General (OIG) to conduct an *agreed-upon procedures* engagement to assess selected aspects of the State of New Hampshire's compliance with the Supplemental Nutrition Assistance Program (SNAP) regulations. The State of New Hampshire (New Hampshire or the State) was one of five states selected by the OIG for assessment during FY 2016 based on the level of SNAP funding (small, medium or large) and geographic location (the States were selected so that different Food and Nutrition Service regions were represented in the assessment). The assessment focused exclusively on compliance with the *Code of Federal Regulations Title 7 CFR Part 273*, *Certification of Eligible Households*. This report presents the results of our assessment of New Hampshire.

TFC performed agreed-upon procedures specified by the OIG to evaluate compliance with *Title 7 CFR Part 273*. The agreed-upon procedures were comprised of two parts: Part 1 specified detailed procedures to assess the State's policies, procedures, and processes and included non-statistical testing of targeted areas of *7 CFR Part 273* for compliance; and Part 2 required a randomly selected statistical sample of 100 active case files and performance of specified procedures to test compliance with *7 CFR Part 273*. The Part 1 and Part 2 specified procedures performed are provided in Appendix A of this report. The sufficiency of the agreed-upon review procedures is the responsibility of the OIG. Consequently, we make no representation regarding the sufficiency of the procedures for which this report has been requested or for any other purpose, nor do we provide an overall opinion on New Hampshire's compliance with *7 CFR, Part 273*. Had we performed additional procedures, other matters might have come to our attention that would have been reported. This agreed-upon procedures engagement was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS). The scope period for this review was October 1, 2014 through September 30, 2015 (Federal Fiscal Year 2015, or FY15).

Our performance of Part 1 of the agreed-upon procedures disclosed three findings, as follows:

1. DHHS did not record SSNs, determine good cause, or disqualify - In accordance with Federal regulations (*7 CFR §273.6, Social Security Numbers*), the State agency shall require that a household participating or applying for participation in SNAP provide the State agency with the Social Security number (SSN) of each household member or apply for one before certification. If the household is unable to provide proof of application for an SSN for a newborn, the household must provide the SSN or proof of application at its next recertification or within six months following the month the baby is born, whichever is later. New Hampshire's New Heights system, its comprehensive benefits management system, disclosed 85 instances in which recipients received benefits for 12 months or longer without having an SSN entered in the system. A review of 30 of the case files for these 85 recipients disclosed 30 exceptions; nine instances where an SSN had been provided to the State but had not been entered in the New Heights system and 21 instances where an SSN was not on file, nor evidence of good cause on record, for not having provided an SSN. The 21 recipients continued to receive

benefits. At the time of this engagement, the State was undertaking corrective action to mitigate the condition of missing Social Security numbers and, subsequent to our fieldwork, has stated that corrective actions have been completed.

2. DHHS did not provide adequate notice of expiration - In accordance with Federal regulations (*7 CFR Part 273.14, Recertification*), each State agency shall develop a Notice of Expiration (NOE) using required language, including the date the certification period expires. Our testing disclosed that New Hampshire did not consistently include the date the certification period expires in its NOE. As a result, Households receiving the NOE were not properly notified of the date the certification period expires and may have experienced an interruption of benefits for not applying for recertification timely.

3. DHHS denied benefits to an eligible student - Federal regulation *7 CFR §273.5, Students,* addresses student eligibility for SNAP benefits. Our testing disclosed one instance in a non-statistical sample of 10 where a student met eligibility requirements but was denied benefits.

In our performance of Part 2 of the agreed-upon procedures, the testing of 100 randomly selected active cases disclosed two findings as follows:[1]

4. Job abandonment and determination of eligibility - Federal regulations (7 *CFR §273.7, Work Provisions)* provide that an eligible household member cannot voluntarily and without good cause quit a job of 30 or more hours a week. We identified one instance where a household member abandoned his/her job, but this was not properly recorded in the New Heights system for proper consideration of eligibility and therefore an error in said determination may have been undetected.

5. DHHS did not update shelter costs - Federal regulations (7 *CFR §273.10, Determining household eligibility and benefit levels)* addresses the benefit amount an eligible recipient may receive. We identified one instance where a recipient became unemployed and moved from a rented living space ($700 a month) to a homeless shelter ($0 a month). This change in living expense was not entered in the New Heights system, thus causing the calculation of deductions to be in error, which could have resulted in an error to the participant's benefits that may have been undetected.

Additional details concerning these findings, along with our recommendations for improvement, are presented in Section V of this report. This report is intended solely for the information and use of the OIG, the Food and Nutrition Service, and the State of New Hampshire. For any questions concerning this report, please contact Tashu Trivedi, TFC Engagement Partner at (301) 792-2401 or at ttrivedi@tfcci.net.

Signed

TFC Consulting, Inc. /s/

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[1] Our review of 100 randomly selected active cases disclosed two instances of non-compliance as detailed in findings 4 and 5. This resulted in an error rate of two percent in our sample, enabling us with a 95 percent confidence level, to project an error rate of 6.3 percent or less in the population.

1 Background

The Department of Agriculture (USDA) Food and Nutrition Service (FNS) administers the Supplemental Nutrition Assistance Program (SNAP), providing nutrition assistance to some 45.76 million participants a month and economic benefits in excess of $73.9 billion annually (FY15).[2] SNAP is the largest domestic hunger safety net program in the United States. FNS works with State agencies to ensure that those eligible for nutrition assistance can make informed decisions about applying for the program and can access benefits. FNS also works with State partners, USDA's Office of Inspector General (OIG), and others to improve program administration and ensure program integrity.

FNS administers the SNAP program – formerly known as the Food Stamp Program – at the Federal level from its headquarters in Alexandria, Virginia, and from its seven Regional Offices (ROs). The ROs each serve a number of different States, and may include U.S. territories.

State offices, in turn, are responsible for overseeing local SNAP offices where applicants can apply for SNAP benefits, and in 42 States, applicants can also apply online. Each State, using its own application form, determines household eligibility and calculates benefits. In New Hampshire, the Department of Health and Human Services (DHHS) performs this function.

DHHS is the largest agency in the New Hampshire State Government, responsible for the health, safety and well-being of the citizens of New Hampshire. In FY14, DHHS issued $140,718,624 in SNAP benefits (which nationally represents 0.20 percent of benefits and r 0.24 percent of all SNAP participants) serving an average of 111,701 people or 53,559 households per month, which ranked 48 out of 53 States and territories in benefits issued. [3]

New Heights is the comprehensive web based benefits management system that DHHS uses to manage State and Federal programs, and it is one of the largest and most complex computer systems in the State Government. The system automates benefit issuance, client scheduling, reporting, and determination of eligibility for 32 programs.[4]

SNAP is authorized by the Food and Nutrition Act of 2008, as amended.[5] Regulatory authority for SNAP resides in the *Code of Federal Regulations (CFR), Title 7 CFR, Parts 271 through 283.* The focus of this agreed-upon procedures engagement was on *7 CFR, Part 273*, which addresses Certification of Eligible Households.

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[2] SNAP National Level Annual Summary, Participation and Costs, 1969-2015, FNS.

[3] SNAP State Activity Report Fiscal Year 2014, FNS SNAP Program Accountability and Administration Division, October 2015.

[4] New Hampshire DHHS Division of Family Assistance, PowerPoint, 2011.

[5] SNAP was previously authorized by the *Food Stamp Act of 1964* and later amended by the *Food Stamp Act of 1977*.

2 Objective and Purpose

The objective of this agreed-upon procedures engagement was to assess selected aspects of New Hampshire's implementation of *Title 7 CFR, Part 273, Certification of Eligible Households*. The assessment procedures associated with this engagement were developed by the OIG and performed under contract by TFC. The purpose of the assessment was to evaluate whether the State was properly administering the SNAP program, determine eligible households, and monitor the issuance and use of program benefits in accordance with *Title 7 CFR, Part 273,* and also to provide recommendations to enhance program efficiency, effectiveness, and success.

3 Scope and Methodology

The scope of this engagement was to assess selected aspects of New Hampshire's compliance with *Title 7 CFR Part 273, Certification of Eligible Household*s. The State of New Hampshire was one of five states selected for testing by the OIG based on non-statistical sampling that considered two criteria: 1) size of the State based on the level of SNAP funding (small, medium or large), and 2) geographic location (states were selected so that different FNS regions were represented in the testing). The New Hampshire SNAP program is considered a "small" program and is located within FNS' Northeast Region.

The engagement was performed by TFC in accordance with agreed upon procedures developed by the OIG. The agreed-upon procedures were comprised of two Parts as follows:

- Part 1, Checklist for Review of State's Compliance with *7 CFR Part 273*, specified procedures to assess the State's policies, procedures and processes and included non-statistical testing for compliance with targeted areas of *7 CFR Part 273*;
- Part 2, Checklist for Review of Active Cases, required a statistical random sample of 100 active case files and performance of specified procedures to test compliance with *7 CFR Part 273*.

Statistical sampling in support of Part 2 testing was based on parameters established by the OIG. OIG's requirement for selection of 100 active cases was based on a very large universe of cases (greater than 10,000 cases), a +/- 10 percent margin when testing attributes, an estimated error rate of 50 percent (most conservative estimate), and a confidence level of 95 percent that the projected error is correct. Non-statistical sampling techniques were applied in conducting review procedures specified in Part 1.

The Part 1 and Part 2 Checklists are provided in Appendix A of this report along with findings noted for each applicable procedure. The sufficiency of the review procedures is the responsibility of the OIG. Consequently, we make no representation regarding the sufficiency of the procedures for which this report has been requested or for any other purposes nor do we provide an overall opinion on New Hampshire's compliance with *7 CFR* Part 273. Had we performed additional procedures other matters might have come to our attention that would have been reported.

The scope period for this engagement was October 1, 2014 through September 30, 2015 (Federal Fiscal Year 2015, or FY15), although the period assessed varied for some tests performed.

Various testing methods and techniques were employed primarily in order to:

- Obtain an understanding of the State agency, its operations, systems, and operating environment;
- Test the State's compliance with *7 CFR 273* at a high level (e.g., policies and procedures); and
- Test a statistically significant sample of active cases for compliance at a granular level.

Assessment fieldwork was performed at the New Hampshire headquarters of DHHS during February 2016. This agreed-upon procedures engagement was conducted in accordance with GAGAS.

4 Findings and Recommendations

This section presents deficiencies identified during our performance of Checklists for Parts 1 and 2 of the agreed-upon procedures. Our recommendations to address each deficiency are provided.

4.1 Part 1, Checklist for Review of State's Compliance

Three exceptions were identified during performance of the review procedures in the Part 1 Checklist, as discussed in Findings 1, 2 and 3 below.

Finding 1: DHHS did not record SSNs, determine good cause, or disqualify

Our testing identified 30 cases that did not meet compliance requirements under *7 CFR §273.6, Social Security Numbers.*

Federal regulations state that the State agency shall require that a household participating or applying for participation in SNAP provide the State agency with the SSN of each household member, or apply for one before certification. Also, the State agency shall explain to applicants and participants that refusal or failure, without good cause, to provide an SSN will result in disqualification of the individual for whom an SSN is not obtained.[6]

We requested from the State a list of individuals who received SNAP benefits during FY15 and did not have a Social Security number entered in the New Heights system (New Hampshire's comprehensive benefits management system). We received a file of 3,205 recipients. Many of the recipients were newborns; as such, they were permitted six months or until the next certification, whichever was longer, before they were required to provide an SSN or good cause for not doing so. To assess compliance, TFC placed the recipients on an aging schedule based on number of months that benefits were received without an SSN. We identified 85 individuals who received benefits for at least 12 months without an SSN, and from this list we randomly sampled 30 cases[7] and reviewed the case files. In all 30 cases, exceptions were noted as follows:

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[6] 7 CFR §273.6(a), 2016

[7] Two of the thirty cases were adults, and were among the nine who had provided their SSN, but the State did not enter their SSNs into the New Heights System.

- In nine cases, case workers did not record the individual's SSN in the New Heights system when the SSN was provided. For individuals who provide SSNs prior to certification, during recertification or at any office contact, Federal regulations state that the State agency *shall record the SSN and verify it.*[8,9]

- In the remaining 21 cases, there was no evidence of good cause on file for the individuals to not provide a SSN within 6 months or at the next recertification. Federal regulations state if a household is unable to provide proof of application for an SSN for a newborn, the household must provide the SSN or proof of application at the next recertification, or within 6 months following the month the baby is born, whichever is later. If the household is unable to comply, the State agency shall determine if good cause applies.[10]

- The 21 individuals who refused or failed without good cause to provide an SSN were not disqualified in accordance with Federal requirements. Federal regulations state that if the State agency determines that a household member has refused or failed, without good cause, to provide or apply for an SSN, then the individual will be disqualified from the SNAP program.[11]

We determined that the exceptions were due to case workers not inspecting each data field in the New Heights system prior to the next recertification, and that, in the system, the SSN field is not required to be filled. Additionally, New Heights does not have automated alerts to notify case workers when SSNs are missing for extended periods of time without good cause.

This resulted in the New Heights system of record not containing accurate and updated case file information. Therefore, errors in eligibility determination may have been undetected. Also, since no determination of good cause was made, individuals who did not have an SSN were not disqualified and households incorrectly received SNAP benefits. At the time of this engagement, the State was undertaking corrective action to mitigate the condition of missing Social Security numbers and, subsequent to our fieldwork, has stated that corrective actions have been completed. We note that of the 21 cases cited above, 3 were closed and the remaining18 SSNs were subsequently entered into the New Heights system.

FNS Recommendation 1

Require DHHS to review the three closed cases identified to determine if payments were improper and warrant establishment of a claim.

Agency Response

In its June 23, 2016, response FNS stated:

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[8] 7 CFR §273.6(b)(1), 2016

[9] It should be noted, the nine cases were updated in the New Heights system subsequent to the scope period to include SSN.

[10] 7 CFR §273.6(b)(4), 2016

[11] 7 CFR §273.6(c), 2016

> FNS concurs with the OIG recommendation. FNS requested that the three cases that were identified be reviewed to determine if payments were improper and warranted establishment of a claim. All three cases were reviewed by NH DHHS and claims were not warranted for any of the cases. They were all below the threshold requiring establishment of a claim.
>
> FNS indicated corrective action has been completed.

FNS Recommendation 2

Ensure New Hampshire DHHS has completed corrective actions necessary to ensure compliance with *7 CFR §273.6, Social Security Numbers.*

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. As the report notes on page 6, at the time of the review "the State was undertaking corrective action to mitigate the condition of missing Social Security numbers and, subsequent to our fieldwork, has stated that corrective actions have been completed." When the issue was brought to the State's attention, NH DHHS generated an initial report of cases with missing SSNs and took action to ensure that SSNs were recorded and verified as required by Federal regulations. NH is re-running the report on a regular basis to follow up on missing SSN information in compliance with 7 CFR 273.6.
>
> FNS indicated corrective action has been completed.

FNS Recommendation 3

Recommend DHHS establish a process in New Heights to ensure that case workers verify SSNs for newborns at the next recertification or when contact is made with the District Office.

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. FNS takes program integrity very seriously. New Heights currently does not have an alert to remind caseworkers that follow-up action is needed to update missing SSNs. NH DHHS is working with its IT division to develop functionality in New Heights that will alert case workers when SSNs are missing for extended periods of time without good cause. The system enhancement would require the worker to obtain and verify SSNs for newborns at the next recertification.
>
> FNS will continue to work with the State to monitor the development of these system enhancements and to provide technical assistance as needed. In the interim, NH DHHS will continue to run regular reports on cases with missing SSNs as described in the response to OIG Recommendation 2.
>
> FNS provided an estimated completion date of January 31, 2017.

Finding 2: DHHS did not provide adequate notice of expiration

Our testing disclosed that New Hampshire DHHS does not consistently meet requirements under 7 *CFR §273.14 Recertification* regarding Notice of Expiration.

We reviewed three sample cases and noted in each case that DHHS did not provide benefit recipients a compliant Notice of Expiration (NOE) using the required language. DHHS did not include the date the certification period expires in the NOE.

Federal regulations state that each State agency shall develop a NOE, and the NOE must contain the date the recertification expires.[12] The New Hampshire NOE template was developed in accordance with State policy which did not include the required language regarding expiration. This was the only required language that was missing, but this information is important because recipients need to know when their benefits expire. As a result, Households receiving the NOE were not properly notified of the date the certification period expires and may experience an interruption of benefits for not applying for recertification in a timely manner.

One of the three cases tested failed to recertify in a timely manner and was subsequently auto-closed. The household in question was provided a notice that included the date and time the applicant was scheduled for an interview, but not the date the certification period ended. The notice stated that the interview was mandatory and if the applicant failed to attend their case would be closed, and benefits would end. When the household missed the scheduled interview appointment, recertification was not completed as required and the case was auto-closed. This is a repeat finding also reported by FNS.

FNS Recommendation 4

Ensure New Hampshire DHHS completes corrective actions to ensure compliance with the Notice of Expiration requirement, including updating the *Food Stamp Manual (FSM)* policy section *161.01 Timely Notice* to include in the notification criteria the date the certification period expires.

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. FNS routinely reviews client notices for compliance with Federal regulations as part of its State and Local Program Access Reviews. As OIG's report notes, missing language on NH's Notice of Expiration is an open finding from the State Program Access Review that was completed in October of 2015. NH reported in its corrective action plan (CAP) to FNS that the Notice of Expiration is being updated in New Heights. Those updates are expected to be completed in July 2016. The Notice of Expiration will remain an open finding until FNS reviews the revised notice and validates that it is in compliance with Federal regulations. FNS will require NH to update section 161.01 of their *Food Stamp Manual* to reflect the revision to the notice.
>
> FNS provided an estimated completion date of August 31, 2016.

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[12] 7 CFR §273.14 (b)(1)(ii)(A), 2016

Finding 3: DHHS denied benefits to eligible student

Our testing disclosed one student who was meeting exemption requirements under *7 CFR §273.5, Students* but was denied benefits.

We received a file of 1,575 students in response to our request for a list of all SNAP recipients who were also students during the scope period; this also included the exemption type for each recipient. We examined the file and noticed the key fields of "enrollment verification" and "exemption type" were either missing values or contained question marks for 158 cases. We assessed these 158 cases to be high risk and non-statistically selected a sample of 10 students and tested for compliance with enrollment and exemption type requirements.

As noted above, in our selected sample, there was 1 instance of non-compliance. Specifically, DHHS incorrectly classified an individual as an ineligible student for refusal to verify employment and hours worked, although that student provided documents evidencing that work exemption requirements were satisfied and the student was eligible to receive SNAP benefits.

Federal statute[13] and regulations state that an individual who is enrolled at least half-time in an institution of higher learning is ineligible to receive SNAP benefits, unless the individual qualifies for an exemption.[14] Section *7 CFR 273.5* allows for 11 different exemption types, of which the work exemption is applicable in this case. The work exemption requires a student be employed for a minimum of 20 hours per week and receive weekly earnings, at least equal to the Federal minimum wage, for those 20 hours of employment.[15]

The case worker believed that the paystubs provided by the student were illegible and entered a "refused/failed to verify" response in the payment information section of the New Heights system. There was no evidence in the case file that the case worker attempted to obtain a more legible copy of the paystub, and, based on our review of the paystubs, we determined that the paystubs were legible and provided reasonable documentary evidence to support the work exemption, and the case worker's determination was in error.

Since the payment information was incorrectly entered in the New Heights system, the student was classified as ineligible, and was refused SNAP benefits. Since this was a single occurrence in a non-statistical sample, we do not believe this to be a widespread occurrence and thus are not providing a formal recommendation.

4.2 Part 2, Checklist for Review of Active Cases

Our assessment of 100 randomly selected active cases[16] followed the agreed-upon procedures specified in the Part 2 Checklist for Review of Active Cases, and disclosed two instances of

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[13] USC, Title 7, Chapter 51 § 2015 (e)

[14] 7 CFR §273.5(a), 2016

[15] 7 CFR §273.5 (b)(5), 2016

[16] Due to the burden to the State of obtaining a population for the entire scope period (October 2014 - September 2015), it was agreed that we would randomly select a point in time or a month within the scope period. We randomly selected the month of February 2015, and the population of active cases was 51,889.

non-compliance as detailed in Findings 4 and 5 below. This resulted in an error rate of two percent in our sample, enabling us with a 95 percent confidence level to project an error rate of 6.3 percent or less in the population.

Finding 4: Job abandonment and determination of eligibility

We identified one case that did not meet requirements under 7 *CFR §273.7, Work provisions.*

Specifically, in our review of active cases, we identified one instance where a household member abandoned his/her job, but it was not properly recorded by the case worker in the New Heights system for proper consideration of eligibility. The case worker may not have been aware of the appropriate method of recording the event or they may have inadvertently made an error. The case was recorded in the New Heights system as "other" as opposed to "voluntary quit."

Federal regulations state that, as a condition of eligibility for food stamps, each non-exempt household member must comply with certain work requirements,[17] and the household member cannot voluntarily and without good cause quit a job of 30 or more hours a week or reduce work effort to less than 30 hours a week.[18]

Further, Federal regulations require that when a household files an application for participation, the State agency must determine whether any household member voluntarily quit his or her job or reduced his or her work effort,[19] and upon determining that an individual voluntarily quit employment, the State agency must determine if it was with good cause.[20]

Since the New Heights system of record did not contain accurate case file information required to make a proper determination of eligibility, an error in determination of eligibility may have been undetected.

FNS Recommendation 5

Require that New Hampshire DHHS review the case to determine if there is good cause for the household members' voluntarily quitting of employment noted in this finding, and update the case records and New Heights system, accordingly.

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. FNS requested that NH DHHS review the case to determine if there was good cause for the household member's voluntarily quitting employment and update the case record accordingly. NH reviewed the case and although there was not good cause, the result did not warrant an establishment of a

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[17] 7 CFR §273.7 (a)(1), 2016

[18] 7 CFR §273.7 (a)(1)(vii), 2016

[19] 7 CFR §273.7 (j)(3)(i), 2016

[20] 7 CFR §273.7 (j)(3)(v), 2016

claim. The case was documented and updated in New Heights. NH DHHS also notes that the issue was addressed with the worker responsible for the error, and the worker was reminded of SNAP policies and procedures related to voluntary quit.

FNS indicated corrective action has been completed.

FNS Recommendation 6

Require that DHHS provide guidance and/or training to case workers and new employees to ensure an understanding of the reasons for termination of employment and how to determine good cause when an individual voluntarily quits, and also to determine when the use of the "other" category is appropriate and necessary.

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. FNS works closely with States to ensure that, when errors or policy issues arise, the State has procedures in place to identify the root causes of the errors. If errors point to systemic issues, States are expected to take action to clarify policies and procedures and/or provide training to staff at all levels to ensure proper understanding of those policies and procedures.
>
> While the one case identified in the report does not necessarily indicate that this is a systemic issue, NH DHHS is in the process of updating its policy with respect to determining good cause when an individual voluntarily quits his/her employment. The State will also clarify when the use of the "other" category is appropriate and necessary. The State is developing a training to accompany the policy update.
>
> FNS provided an estimated completion date of September 30, 2016.

Finding 5: DHHS did not update shelter costs

We noted 1 case that did not meet requirements under *7 CFR §273.10, Determining household eligibility and benefit levels.*

Our testing disclosed one case where DHHS did not record and maintain accurate expense information required to make an accurate determination of eligibility; this could have resulted in an error to the participant's benefits that may have been undetected.

Specifically, a determination of eligibility was made for a household that reported a change of address on an application at recertification; however, the change of address and expenses associated with the change of address were not updated in the New Heights system. In this case, a homeless participant provided a mailing address to a case worker; the participant later gained employment and rented a living space for $700.00 a month. The participant subsequently became unemployed, lost her living quarters, and became homeless again. At a subsequent recertification, the participant provided the mailing address she had provided when she was previously homeless, and the case worker updated the address and shelter costs accordingly.

Federal regulations identify shelter costs as a deductible expense in determining benefits,[21] but the case worker in this instance did not update the shelter costs from $700.00 to $0.00 in the New Heights system. As a result, the New Heights system of record did not contain accurate shelter expense information required to make an accurate determination of eligibility; and therefore, the calculation of deductions were in error and could have resulted in an error to the participant's benefits that may have gone undetected. We note that in this case the recipient had no income and therefore there was no impact to the recipient's benefit amount.

FNS Recommendation 7

Require that New Hampshire DHHS provide guidance and/or training to case workers and new employees to ensure an understanding of the proper procedures for processing applications, including verification of changes by a third party, where applicable, for addresses, income, and deductions, etc.

Agency Response

In its June 23, 2016, response FNS stated:

> FNS concurs with the OIG recommendation. FNS is committed to ensuring that eligible households have access to SNAP benefits and that those benefit amounts are accurate. We note that this could be an isolated error as opposed to an indication of a systemic issue. However, the State will send a reminder to all staff in July about proper procedures for acting on reported changes in shelter costs.
>
> FNS provided an estimated completion date of July 31, 2016.

5 Performance Improvement Opportunities

Throughout the course of this engagement, data requests were made, but documentation was not always provided in a timely manner, and in some cases only partially provided (e.g., student exemption types) or not provided at all (e.g., records of participant duration of participation in SNAP or aging analysis of total caseload). This was due in part to the New Height's system limitations, and in part to there being only one person in the State of New Hampshire responsible for running the ad hoc queries needed to return the data requested.

In the case of the latter, we recommend the State train additional staff to perform ad hoc queries. Having a single individual capable of performing this vital function is an unnecessary risk to the State agency as it limits the State's capacity to timely obtain ad hoc data and may impose data blackouts in the event of illness, vacation, career change, etc.

[21] 7 CFR §273.10 section (d), 2016

Appendix A: Summary of Test Procedures and Results of Testing

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.1 Household Concept	Inquire whether the State has any definitions of SNAP "Households" that deviate from the regulations. If so, determine why and if FNS has approved the deviation.	No
§273.2 Office Operations and Applications Processing	For the scope period, determine whether the State's documented operating procedures for SNAP application processing are in accordance with the regulations. Specifically, determine whether the State has maintained information to document the following: a) Households that have failed to cooperate with eligibility determination or re-verification of eligibility, and if so, if those Households were refused benefits. Please capture the number of Households involved. b) Households that have failed to cooperate with the State's Quality Control (QC) reviews, and if so, if those Households were refused benefits. Please capture the number of Households involved.	No
§273.3 Residency	Determine what type of residency documentation the State uses to verify that SNAP applicants reside in the State where they have submitted a SNAP application, and how often it is re-verified.	No
§273.5 Students	Determine whether the State has support for the number of "students' participating in SNAP and the exemption type that each has been designated. If so, obtain copies of the support documentation.	Exception noted, reference finding #3
§273.6 Social Security Numbers	Determine whether the State has support for the number of SNAP recipients who are participating that have not provided an SSN, and if all of them has proper justification for not doing so. Obtain copies of the support documentation.	Exception noted, reference finding #1
§273.7 Work Provisions	Determine whether the State has support for the number of SNAP recipients who are also working and adequately meeting the SNAP Work provisions. If so, obtain copies of the support documentation.	No
§273.7 Work Provisions	Also, determine the number of SNAP recipients who are required to meet the SNAP work provisions, but for some reason (State waiver, etc.) have not done so.	No

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.8 Resource Eligibility Standards	Determine whether the State has support documentation for the number of SNAP Recipients that have been excluded from the Resource Eligibility standards because of Categorical Eligibility or Broad Based categorical Eligibility. For those SNAP recipients that are subject to the Resource eligibility standards, has the State maintained support documentation to verify that they have met the resource eligibility standards?	No
§273.9 Income and Deductions	Determine whether the State has support documentation to demonstrate how many of the State's SNAP recipients fall under either the a) 130 percent of the Federal poverty level income limit or b) categorical or broad based categorical eligibility	No
§273.10 Determining Household Eligibility and Benefit Levels	Determine whether the State certification of eligibility, including income, deductions, and resources is a) Accomplished using third party documentation or whether these amounts are self-certified by the applicant. b) Affected by the payment(s) of Low Income Energy Assistance Act subsidies to the applicant.	No
§273.11 Action on Households with Special Circumstances	Determine whether the State has support documentation to identify those SNAP Households where one or more members have been disqualified from SNAP, and if so, identify the exact number of disqualified individuals and households compared to the State's total SNAP recipients and Households.	No
§273.12 Requirements for Change Reporting Households	Determine for each of the following eligibility factors whether the State requires SNAP Household changes that trigger reporting to be reported when they happen (or usually within 10 days) or at the next recertification, or never, and what regulations they use to justify those procedural guidelines: a) Earned income b) Unearned income c) Deductions/expenses d) Low Income Heating and Energy Program (LIHEAP) subsidy e) Resources f) Assets g) Household size h) Work provision compliance	No

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.13 Notice of Adverse Action	Determine the number of adverse action notices sent out in the State for the last two Fiscal Years, the number of these that were successfully appealed, and the resulting number of adverse actions that actually were implemented.	No
§273.14 Recertification	Determine the following for the current months' (or select a consistent sample month for all State contracted reviews) SNAP caseload (participating Households): a) How often the entire caseload of Households are recertified; b) How many recertifications involve face-to face interviews; c) How many recertifications require a household's authorized signature; and d) How many include re-verification of eligibility information. For example, 50 percent are recertified every 6 months and 50 percent are recertified every 12 months.	No
§273.14 Recertification	Also, determine if the State has procedures to ensure that: a) An adequate Notice of Expiration has been developed by the State; and b) Applicant eligibility information is maintained by the authorizing SNAP office.	Exception noted, reference finding #2
§273.16 Disqualification for Intentional Program Violation	For the Scope period, determine the following: a) The number of Intentional Program Violations (IPV) identified by the State for the last 3 FYs; b) The number of IPVs reported to FNS by the State; c) The number of IPVs the State has classified as inadvertent household errors using the regulation passage cited in the criteria below; and d) Whether all IPV cases reported to FNS were entered onto the disqualified recipient database in accordance with procedures specified by FNS.	No

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.18 Claims Against Households	Identify for the Scope period: a) The number of claims against Households broken down by IPV, IHE, and AE, and if they were all reported to FNS accurately and for the correct period; b) Whether all types of errors can result in claims against Households; c) The dollar value of claims established against Households; d) The dollar value of claims actually recovered, whether recovered in part or in full; e) A breakdown of the amounts recovered by recovery method (reduction in benefits, cash, Treasury offset, etc.); f) The number and dollar value of claims against Households written off by the State; and g) A breakdown of the claims written off by the justification for the write-offs.	No
§273.18 Claims Against Households	Also, determine if the State has documented Claims Against Households policy and procedures, the date of the last update or current date of those policy/procedures, and whether those policies and procedures were: a) Approved by FNS; and b) Timely and consistently disseminated to all of the State's local (Welfare) offices	No
§273.20 SSI Cash-Out	For the State of California, determine the following: a) If the State has policy and procedures to ensure that those who receive CA SSI benefits do not also receive SNAP benefits in CA for the same period; b) If the State has policy and procedures to ensure that those that receive CA SSI benefits do not also receive SNAP benefits in other States for the same period; and c) The number and dollar value of recipients on (a) the SNAP program and (b) the CA SSI program	N/A for the State of New Hampshire

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.21 Monthly Reporting and Retrospective Budgeting (MRRB)	For the Scope period, determine the following: a) How much of the State's SNAP caseload (both in number of Households and SNAP dollars) are on the one or two-month MRRB reporting system; b) If the State has accurate policies and procedures for the inclusion and exclusion of SNAP recipients from the MRRB process; and c) If the State no longer uses MRRB, have they received an official written waiver from the FNS Administrator to no longer use it	N/A for the State of New Hampshire
§273.23 Simplified Application and Standardized Benefit Projects	For the Scope period, determine the following: a) How many (Households and SNAP dollar value) SNAP recipient are on the Simplified Application and Standardized Benefit Project program versus the State's entire SNAP Household caseload; b) If FNS has approved the State's Official Work Plan for this Program; c) If the Work Plan accurately defines "Project-eligible households" and "Determining Food Stamp Program eligibility" in accordance with the regulations; and d) If the State monitored compliance with the Official Work Plan approved by FNS.	N/A for the State of New Hampshire
§273.24 Time Limit for Able-Bodied Adults	For the Scope period, determine the following: a) If the State has an FNS approved Workfare Program. If not, does the State have a waiver from FNS or is there other authorizing statute or regulation that eliminates the need for a State Workfare Program? b) If the Workfare Program State Plan has a definition of SNAP "Able-bodied adults." c) If the State has information which identifies all able-bodied adults in its entire SNAP caseload. If so, obtain the number of able-bodied adults and their relative SNAP benefits authorized versus the entire SNAP Household caseload and SNAP benefits authorized Statewide. d) The number of Households and related SNAP benefit dollars of those Households that actively participate in any (a) a State approved work related employment and training program or (b) that actually work versus the entire SNAP caseload of Households and SNAP benefit dollars. e) If the State can identify in its entire SNAP	No

Part 1, Checklist for Review of State's Compliance Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
	Household caseload how many Households have been receiving SNAP for 3 years or less and for more than 3 years. Obtain from the State an "aging" profile of their entire SNAP caseload, broken down by how many months (on average or actual by each Household) Households have (continually) received SNAP benefits. f) If SNAP (average or actual) duration of participation in SNAP is not maintained or summarized or available from the State, define what information is provided by the State to FNS so that FNS may publicize the "average" participation time of SNAP Households (as in Performance Reports and Hearings). If SNAP (average or actual) duration of participation in SNAP is not maintained or summarized or available from the State, for a current month to be selected, perform an aging analysis on the month's total SNAP caseload. If that information is too unwieldy or excessive for a reasonable time for summarization, obtain the electronic information necessary from the State to be able to perform that analysis.	
§273.25 Simplified Food Stamp Program (SFSP)	Determine if the State has an FNS approved SFSP Plan and the date it was approved.	N/A for the State of New Hampshire
273.25 Simplified Food Stamp Program (SFSP)	The State provided an opportunity for public input on the proposed SFSP plans (with special attention to changes in benefit amounts that are necessary in order to ensure that the overall proposal not increase Federal costs) through a public comment period, public hearings, or meetings with groups representing participants' interests. Final FNS approval will be given after the State informs the Department about the comments received from the public.	N/A for the State of New Hampshire
273.25 Simplified Food Stamp Program (SFSP)	Also, determine for the Scope period the number of SNAP Households and their related SNAP benefit dollars that are on the SFSP as compared to the State's entire SNAP Household caseload.	N/A for the State of New Hampshire

Part 2, Checklist for Review of Active Cases Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.1 Household Concept	Determine if each member of the SNAP household is an eligible household member as defined by CFR 273.1.	No
§273.2 Office Operations and Applications Processing	Was the application or re-certification processed in accordance with the State's documented operating procedures?	No
§273.2 Office Operations and Applications Processing	Did the household fail to cooperate during the eligibility determination process or with the State's QC review process? If so, was the household refused benefits?	No
§273.3 Residency	Determine if the recipient's residency was evaluated and that the case was certified based upon appropriate residency documentation.	No
§273.5 Students	Determine if the State agency appropriately identified the student status of the household members in accordance with CFR 273.5.	No
§273.6 Social Security Numbers	Determine if the SNAP household provided Social Security numbers in accordance with CFR 273.6.	No
§273.7 Work Provisions	Was the determination on whether the household was required to participate or exempt from work requirements appropriate as defined in CFR 273.7? Ensure that the verification used to make this determination was appropriate.	Exception noted reference finding #4.
§273.8 Resource Eligibility Standards	Was the household required to meet resource eligibility standards? If not, document the reason.	No
§273.8 Resource Eligibility Standards	If the household is required to meet resource eligibility standards, determine if the State agency appropriately verified the household's resources in accordance with CFR 273.8.	No
§273.9 Income and Deductions	Determine if the State agency appropriately determined and verified the household's gross income in accordance with CFR 273.9.	No
§273.10 Determining Household Eligibility and Benefit Levels	Was the household eligibility and benefit level determinations made with documentation verified by a third party? If not, describe the circumstances that caused the State agency to determine eligibility and benefit level through self-certification. Also, was the household's eligibility and benefit level determination affected by Low Income Energy Assistance Act subsidies received by the household?	Exception noted reference finding #5.
§273.11 Action on Households with Special Circumstances	Does the household contain one or more members who are disqualified from SNAP?	No

Part 2, Checklist for Review of Active Cases Results from Testing 7 CFR 273		
7 CFR Subsection	**Review Procedures**	**Were exceptions found as a result of applying the procedure?**
§273.12 Requirements for Change Reporting Households	If a change occurred that was required to be reported by the household, document if the household reported the change and the State agency handled it appropriately in accordance with the regulations.	No
§273.14 Recertification	For the Scope period, document the number of times the household was recertified, whether a face-to-face interview was conducted, whether the State agency required the household's authorized signature, and whether the household's eligibility information was maintained and re-verified in accordance with CFR 273.14.	No
§273.16 Disqualification for Intentional Program Violation.	Was any member of the household disqualified through an Intentional Program Violation (IPV)? If so, how many?	No
§273.16 Disqualification for Intentional Program Violation.	Was the recipient who was disqualified through an IPV reported to FNS?	No
§273.16 Disqualification for Intentional Program Violation.	Was the recipient who was disqualified through an IPV classified as an inadvertent household error?	No
§273.16 Disqualification for Intentional Program Violation.	Was the recipient who was disqualified through an IPV entered onto the disqualified recipient database in accordance with procedures specified by FNS?	No
§273.18 Claims Against Households	Has a claim ever been established against this household? If so, what was the reason for the claim and its dollar value? Was it recovered? If so, how was it recovered? If not, why not? If it was ultimately written off, what was the justification for the write-off?	No
§273.24 Time Limit for Able-Bodied Adults	Are there any able-bodied adults as defined in CFR 273.24 contained in the household? If so, how many? (All adults are considered able-bodied unless they meet the exceptions described in CFR 273.24 (c).)	No
§273.24 Time Limit for Able-Bodied Adults	Was the household treated appropriately with respect to the requirements placed on able-bodied adults, as described in CFR 273.24?	No

USDA'S
FNS
RESPONSE TO AUP REPORT

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Room 712

Alexandria, VA
22302-1500

DATE: June 23, 2016

AUDIT NUMBER: 27601-0001-10

TO: Gil H. Harden
Assistant Inspector General for Audit

FROM: Audrey Rowe /s/
Administrator
Food and Nutrition Service

SUBJECT: New Hampshire's Compliance with SNAP Certification of Eligible Households

This letter responds to the official report for audit number 27601-0001-10, New Hampshire's Compliance with Supplemental Nutrition Assistance Program (SNAP) Certification of Eligible Households. Specifically, the Food and Nutrition Service (FNS) is responding to the seven recommendations in the report.

OIG Recommendation 1:

Require DHHS to review the three closed cases identified to determine if payments were improper and warrant establishment of a claim.

FNS Response:

FNS concurs with the OIG recommendation. FNS requested that the three cases that were identified be reviewed to determine if payments were improper and warranted establishment of a claim. All three cases were reviewed by NH DHHS and claims were not warranted for any of the cases. They were all below the threshold requiring establishment of a claim.

Estimated Completion Date:

Completed

OIG Recommendation 2:

Ensure New Hampshire DHHS has completed corrective actions necessary to ensure compliance with 7 CFR 273.6, *Social Security Numbers.*

FNS Response:

FNS concurs with the OIG recommendation. As the report notes on page 6, at the time of the review "the State was undertaking corrective action to mitigate the condition of missing Social Security numbers and, subsequent to our fieldwork, has stated that corrective actions have been completed." When the issue was brought to the State's attention, NH DHHS generated an initial report of cases with missing SSNs and took action to ensure that SSNs were recorded and verified as required by Federal regulations. NH is re-running the report on a regular basis to follow up on missing SSN information in compliance with 7 CFR 273.6.

Estimated Completion Date:

Completed

OIG Recommendation 3:

Recommend DHHS establish a process in New Heights to ensure that case workers verify SSNs for newborns at the next recertification or when contact is made with the District Office.

FNS Response:

FNS concurs with the OIG recommendation. FNS takes program integrity very seriously. New Heights currently does not have an alert to remind caseworkers that follow-up action is needed to update missing SSNs. NH DHHS is working with its IT division to develop functionality in New Heights that will alert case workers when SSNs are missing for extended periods of time without good cause. The system enhancement would require the worker to obtain and verify SSNs for newborns at the next recertification.

FNS will continue to work with the State to monitor the development of these system enhancements and to provide technical assistance as needed. In the interim, NH DHHS will continue to run regular reports on cases with missing SSNs as described in the response to OIG Recommendation 2.

Estimated Completion Date:

January 31, 2017

OIG Recommendation 4:

Ensure New Hampshire DHHS completes corrective actions to ensure compliance with the *Notice of Expiration* requirement, including updating the *Food Stamp Manual (FSM)*

policy section 161.01 *Timely Notice* to include in the notification criteria the date the certification period expires.

FNS Response:

FNS concurs with the OIG recommendation. FNS routinely reviews client notices for compliance with Federal regulations as part of its State and Local Program Access Reviews. As OIG's report notes, missing language on NH's Notice of Expiration is an open finding from the State Program Access Review that was completed in October of 2015. NH reported in its corrective action plan (CAP) to FNS that the Notice of Expiration is being updated in New Heights. Those updates are expected to be completed in July 2016. The Notice of Expiration will remain an open finding until FNS reviews the revised notice and validates that it is in compliance with Federal regulations. FNS will require NH to update section 161.01 of their *Food Stamp Manual* to reflect the revision to the notice.

Estimated Completion Date:

August 31, 2016

OIG Recommendation 5:

Require that New Hampshire DHHS review the case to determine if there is a good cause for the household members' voluntarily quitting of employment noted in this finding, and update the case records and New Heights system, accordingly.

FNS Response:

FNS concurs with the OIG recommendation. FNS requested that NH DHHS review the case to determine if there was good cause for the household member's voluntarily quitting employment and update the case record accordingly. NH reviewed the case and although there was not good cause, the result did not warrant an establishment of a claim. The case was documented and updated in New Heights. NH DHHS also notes that the issue was addressed with the worker responsible for the error, and the worker was reminded of SNAP policies and procedures related to voluntary quit.

Estimated Completion Date:

Completed

OIG Recommendation 6:

Require that DHHS provide guidance and/or training to case workers and new employees to ensure an understanding of the reasons for termination of employment and how to

determine good cause when an individual voluntarily quits, and also to determine when the use of the "other" category is appropriate and necessary.

FNS Response:

FNS concurs with the OIG recommendation. FNS works closely with States to ensure that, when errors or policy issues arise, the State has procedures in place to identify the root causes of the errors. If errors point to systemic issues, States are expected to take action to clarify policies and procedures and/or provide training to staff at all levels to ensure proper understanding of those policies and procedures.

While the one case identified in the report does not necessarily indicate that this is a systemic issue, NH DHHS is in the process of updating its policy with respect to determining good cause when an individual voluntarily quits his/her employment. The State will also clarify when the use of the "other" category is appropriate and necessary. The State is developing a training to accompany the policy update.

Estimated Completion Date:

September 30, 2016.

OIG Recommendation 7:

Require that New Hampshire DHHS provide guidance to case workers and/or new employees to ensure an understanding of the proper procedures for processing applications, including verification of changes by a third party, where applicable, for addresses, income, and deductions, etc.

FNS Response:

FNS concurs with the OIG recommendation. FNS is committed to ensuring that eligible households have access to SNAP benefits and that those benefit amounts are accurate. We note that this could be an isolated error as opposed to an indication of a systemic issue. However, the State will send a reminder to all staff in July about proper procedures for acting on reported changes in shelter costs.

Estimated Completion Date:

July 31, 2016

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