

Department of Transitional Assistance

Bridge to Stability Action Plan: First 100 Days

The Department serves one out of every eight people in the Commonwealth, primarily working families, children, elders, and people with disabilities. The mission of the Department is to assist low-income individuals and families to meet their basic needs, increase their incomes, and improve their quality of life. We meet this mission by providing a variety of services, including food and nutritional assistance, cash assistance, and employment supports. Although the Department provides cash and nutrition benefits, the goal of the Department is to transition clients by providing supports enabling them to move toward economic stability.

This 100 day Plan also incorporates established best practices, policy and procedural changes, an increase in the provision of oversight and training, and significant investments technological enhancements as it serves to address specific issues raised by the Office of the Inspector General (OIG), the Office of the State Auditor (OSA) and federal regulators. In addition, it balances program integrity enhancements with improved client satisfaction.

These specific initiatives are being undertaken by the Department to enhance program integrity, restore public and legislative confidence in the Department's ability to carry out its mission, and utilize taxpayer dollars most efficiently while serving the Commonwealth's most vulnerable citizens.

Phase I – Program Integrity Enhancements

- **Registry of Motor Vehicles**

In process: The Department is in the process of entering a data-sharing agreement with the RMV to obtain access to its data base. The RMV record review will allow DTA to verify all vehicles owned by the applicant and will eliminate reliance on client disclosure to obtain information regarding vehicle ownership. The Department is also working on "batch" data matching with the RMV to identify any potential undisclosed vehicle ownership on an ongoing basis for all adult cash assistance recipients. This match would identify all vehicles registered at an address and the approximate value of each vehicle.

- **Income Verification Enhancements:**

Started at Central Office: The Department has begun a pilot with Equifax to evaluate the Work Number, an automated employment verification system. This new product is expected to significantly impact the timeliness of employment information available and greatly reduce the number of overpayments as a result of not being able to verify up-to-date income. This form of Front End Detection not only ends the "Pay and Chase" method of dispensing benefits but also acts as a deterrent.

- **Social Security Number Verification:**

To be completed in May: The Department has started implementing

verification processes to improve the accuracy and integrity of social security numbers. The Department will develop and automated solution within its eligibility system, BEACON.

To be in completed in September: DTA will add functionality in the BEACON eligibility system to automate the data matching and noticing process.

- **Department of Revenue (DOR) Data Matching:**
In process: The Department is working with DOR to improve the income verification process. The pilot will make front end employment information available at the time of application, as well as expand the data received to include self-employment income, rental income, and possibly alimony.
- **Department of Elementary and Secondary Education - School Attendance Verification:**
To be completed in April: The Department is working with DESE to access statewide school attendance via an electronic data match to better assess compliance with this requirement.
- **Department of Criminal Justice Information Services (DCJIS) Warrant Match**
To be completed in April: The Department currently conducts an outstanding warrant match with CJIS on a quarterly basis. This match takes 3 months to complete. The new match will be conducted on a monthly basis, with automated notices being sent to the recipient. This enhancement will insure that the match is conducted more frequently and efficiently so that no cash assistance recipient will receive benefits while having an outstanding warrant for their arrest.
- **ICE - Citizenship of Unverified Applicants:**
To begin implementing in May: The Department will review and revise procedural guidance and train field staff to insure that case managers are consistently using the Systematic Alien Verification for Entitlements (SAVE) verification process for all noncitizen applicants.
- **Absent Non-Custodial Parent Verification:**
To be implemented in May: The Department will increase file examination that will potentially result in more absent non-custodial parents being identified in the household and the children not being deprived of parental support.
- **Residency and Address Verification:**
To be implemented in May: The Department is revising the Landlord Verification Form or Shared Housing Verification Form, used to verify an applicant's residency and address, to include a clause indicating that the

signatory on the form has signed “under penalties of perjury”. Case Managers will be instructed to verify a client’s address each time it changes.

Additional Program Integrity Enhancements

- **ATM and POS Withdrawal Monitoring:**
Implemented in March 2013: The Department has begun a bi-weekly monitoring of ATM and POS withdrawals to identify any purchases made at prohibited establishments. DTA staff members are monitoring where transactions are located and visiting potentially prohibited establishments, such as stores that sell liquor and not groceries. DTA is following up on any potential violations with clients, retailers and law enforcement. Retailers who violate the law will be notified of their responsibilities under the law and the penalties for violation. These notices will be shared with local law enforcement. Clients found purchasing prohibited items or using ATMs at prohibited establishments will be investigated and penalties enforced.

In the first two weeks of ATM monitoring the Department reviewed 79,000 ATM transactions at 6,500 distinct locations. These included 163 liquor stores, 12 tobacco shops, 1 tattoo parlor, and 1 travel agency. In addition, more than 800 ATM companies (such as ATM Express and Cardtronics) were investigated to identify possible locations in prohibited establishments.

- **Block prohibited items and establishments:**
In process: The Department is working with its EBT vendor, Xerox, to modify its EBT system to block ATMs in prohibited establishments. Cash assistance clients are not permitted to purchase items or withdraw cash at prohibited locations using their EBT cards. As Xerox works to modify their system, the Department has started monitoring ATMs across the Commonwealth to determine if they are located in a prohibited establishment.
- **Work with state and local law enforcement agencies to combat SNAP trafficking:**
In process: The Department will enter into an agreement with the United States Department of Agriculture-Food and Nutrition Services Bureau (USDA-FNS) to become a State Law Enforcement Bureau (SLEB). The agreement will grant the Department the authority to conduct investigations into possible Supplemental Nutritional Assistance (SNAP) fraud, and create the framework for local law enforcement to investigate retailers with the authorization of FNS. This agreement is an example of DTA’s pro-active approach to building relationships with law enforcement and developing new sources of information.
- **Implement \$5 fee for replacement EBT cards:**
Implementation completed: EBT card replacement fees of \$5 for cash assistance clients began in December, 2012. The total collected from cash

clients through February, 2013 was \$15,770. Total fee collections for FY13 are estimated at approximately \$30,000 - \$50,000. Early indicators suggest a 28% decrease in replacement requests.

To be implemented in April: The Department has received approval from the USDA to charge a similar \$5 replacement fee for SNAP clients. Total fee collections for SNAP recipients for FY13 are estimated at approximately \$120,000 - \$200,000.

- **Notice and monitor clients who request multiple EBT card replacements:**
Implementation completed: Because multiple EBT card replacements can be an indicator of fraud, the Department instituted a process of review when a fourth replacement card is requested within twelve months.
- **Enhance the Department's ability to aggressively pursue chronic mismanagement of cash benefits**
To begin in May: Under Interim Commissioner Monahan's direction, the Department will implement a comprehensive and proactive screening and vendor payment plan. The plan will direct payment of 'certain clients' cash benefits for housing, utilities, or other obligations, ensuring that taxpayer resources are used as intended, for these basic needs.

Phase II – Long-Term and On-Going Initiatives

- **IES Phase II:**
The Department is currently participating in the development of a new Integrated Eligibility System (IES) that will be available through the state operated health insurance exchange. This is an unprecedented opportunity through the Affordable Care Act to align MassHealth and Department eligibility processes and further improve program integrity. By linking agencies to a shared services portal, the Department will enhance its ability to verify eligibility using the EOHHS/state the Federal data hubs.
- **External Audit:**
To begin in March: The Department has hired an external audit firm – Ernst & Young to perform an independent review and recommend further improvements and processing efficiencies in Program Integrity, Administration and Finance, and Field Operations. The firm will spend 4 to 6 weeks in the field and will file a draft report with DTA in mid-May.
- **Bridge to Stability Listening Tour:**
Began in March: Interim Commissioner Monahan and Department staff has embarked on a state-wide listening tour that allows residents all across the Commonwealth to share ideas, provide feedback and suggestions on how the Department can improve. Following the final session, the Department will file

a report with the Governor and Legislature that will incorporate the feedback we received during the sessions.

- **Process Improvements:**

In process: The Department will implement process enhancements to improve the timeliness of processing new benefit applications and re-certifications, improve SNAP error rate to exceed the national average and find technological solutions to improve service delivery and reduce client wait times.

- **Program Integrity Unit Staff Additions:**

In process: The Department anticipates that the initiatives outlined above will uncover cases where action should be taken to address eligibility errors or fraud. The anticipated increase in data matches and fraud investigations will lead to an increase in disqualification hearings – and thus, a greater need for hearing officers and clerks to avoid the accumulation of a hearing appeals backlog. DTA anticipates that an additional 3 fraud investigators, 4 Data Matching unit staff, 6 hearing officers and 3 clerks will be needed to handle the additional caseload.

- **Ongoing Hiring of Bargaining Unit staff:**

In process: To combat a rise in caseload, the Department has implemented changes to its hiring process by backfilling caseworkers on a continuous, rolling basis to keep pace with an attrition rate which averages seven case managers per month. In addition to the caseworker hires, clerical positions are also being backfilled.

In addition, Central Office management and administrative positions will be filled to implement various program integrity process enhancements and initiatives.

- The Department will continue to develop and implement a plan for addressing USDA overpayment.