



**Bureau of Fraud Investigation
City Employee SNAP Wage Match Procedure
(Project 480- SNAP)
January 7, 2014**

Prepared by:

**Management Analysis, Policy &
Data**

**Investigation, Revenue and
Enforcement Administration**

PROCEDURE NOTE:

This procedure manual (including any modifications) is prepared for informational purposes only. The purpose of this procedure manual is to provide support and guidance to the management and staff of the NYC/HRA Investigations, Revenue, and Enforcement Administration (IREA). Nothing in this manual is intended to create nor does it create any enforceable rights, remedies, entitlements, or obligations. IREA reserves its right to change or suspend any or all parts of this manual at any time.

I. AUDIENCE

This procedure is intended for all Investigation, Revenue, and Enforcement Administration (IREA) Bureau of Fraud Investigation (BFI) staff: Director, Supervisor, Senior Fraud Investigators, Fraud Investigators, and Clerical support staff.

II. BACKGROUND

U.S. Department of Agriculture (USDA) regulation requires that all state and local agencies perform an evaluation on cases that result in a Supplemental Nutrition Assistance Program (SNAP) overpayment. The New York State Office of Temporary and Disability Assistance (OTDA) is responsible for administering the SNAP program, formerly known as food stamps. OTDA's Administrative Directive, Establishing and Collecting Food Stamp Overissuance Claims (04-ADM-01) provides guidance and policy directives for establishing SNAP claims and collections. HRA's Family Independence Administration (FIA) Policy Directive Processing Of Food Stamp Claims (07-11-ELI) outlines the steps to pursue an overpayment of SNAP benefits that the client was not entitled to receive. BFI is responsible for investigating SNAP cases where possible fraud or overpayment occurred due to unreported income.

III. OVERVIEW

The City Employee SNAP Wage Match (Project 480) is a data match of SNAP clients with reported earned income. The match is run each month by OTDA and is sent to IREA Systems. IREA Systems formats the data and forwards it to Management Analysis, Policy and Data's (MAPD) Data Analytics Unit (DAU).

DAU reviews the data to identify cases which are likely to result in a positive disposition. Among the data elements reviewed by DAU are 1) earned income amount, 2) household size, 3) income disclosed to the agency by the client, 4) amount of SNAP benefits, 5) eligibility dates, and 6) case status. DAU selects those cases where the client's household was ineligible for benefits and the income was not disclosed to the agency.

IREA Systems inputs the cases in the Investigative Reporting Information System (IRIS). IREA Systems ensures that the cases are not duplicates of current or recent investigations. Cases for HRA employees that are identified for investigation are referred to BFI/IREA management who will determine if the Department of Investigations should be notified.

IV. INVESTIGATIVE STEPS

A. Initial clearances

[REDACTED]. The investigator should promptly print out the Welfare Management System (WMS) clearances and Resource File Integration (RFI) information for each Project 480 investigation. The WMS screens to print include:

- WMS Case Menu Screen 22, Case Composition–Suffix/Individual Summary (Figure 1).
- WMS Case Menu Screen 22X, Client Information (Figure 2).
- Most recent RFI screens (Figure 3) for Wage Reporting System (WRS) and Unemployment Insurance Benefits (UIB), if any. If there is no RFI WRS income information, the investigator should review the IRIS allegation and identify the reported income, the employer name and address.

The screenshot displays the WMSDEV application window titled "M89WDZ WMSDEV - Reflection for ReGIS Graphics". The main screen shows the "Case Composition - Suffix/Individual Summary" for Case # 066 DCD CD. The screen is divided into several sections:

- Case Information:** Case # 066 DCD CD, Address 250 CHURCH ST, City NEW YORK, Zip 10022, Phone No. () - -.
- Case Name:** Case Name [REDACTED], SF-NET.
- Case Details:**

| SUF | FS | SUF | Case | Lang | SP | E |
|-----|----|-----|--------|------|------|---|
| PA | AP | | Parent | TB | Ind | |
| MA | AP | | Parent | TB | Date | |
| FS | AP | | Ind | / | / | |
- Next RECERT:** / / FSINTW
- LAST PA RCT:** / / LAST MA RCT / / Next check / / Next ATP / / M
- Suffix:** Sel PA MA FS LN CIN First Name M Last Sex Birth PA MA FS ES CD P
- Individual Data:** 01 01 01 01 [REDACTED] HELA [REDACTED] F 01/01/71 AP AP AP

At the bottom, it shows "Next case #" and "CMD". The status bar at the bottom indicates "425, 2" and "VT500-7 -- M91PZZ".

Figure 1

M89WDZ WMSDEV - Reflection for ReGIS Graphics

File Edit Connection Setup Macro Window Help

NQIN2A (Z) Client Information as of 09/30/13 09/30/13

Page 01 of 01

CIN First Name M Last Sex SSN Val SSN Date Birth Date

HELA F 1 / 01/01/1971

CHAP SSI BCS OTM EDC WK-PROG Vet RR 30-1-3-History Date St/Fed Date

Begin End 00/00

Stud ID Stud ID Code 0 Tasa Ind ACI DOS / / DEC / /

Alien# CDC SSF Mar Stat Ed Stat High Degree

Afis Ind EPI CH AD-EX / / BVI H N I N A N B N P N W Y

Sel Case No. LN ---Dispositions--- ---Last Txn--- CAT S/F ---Employ---

Hist Ctr Cat FAP Rel Sf St Rsn Date Auth No. Type Code Chrg Code Date

01 PA 01 AP 09/30/13 00000000 / /

066 FA MA 01 AP 09/30/13 / /

FS 01 AP 09/30/13 Rel Moth 00 TL-Ex / /

PA / / / /

MA / / / /

FS / / Rel Moth 00 TL-Ex / /

PA / / / /

MA / / / /

FS / / Rel Moth 00 TL-Ex / /

Select History Date Range : / / to / / IPV MSP TPhi DGC

To view a Case, enter Case #: Suf: Date: 09/30/13

Next Date: 09/30/13 Cin: or Case #: Ln: CMD

A0083 OTHER NAME(S) DO NOT EXIST

420, 2 VT500-7 -- M91PZZ 00:36:24 Num Caps

Figure 2

M89PVZ WMS.r4w - Reflection for ReGIS Graphics

File Edit Connection Setup Macro Window Help

NQRF01 (P) RFI CASE LIST 10/08/13

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Case No: Center: 037 Unit/Worker: 00021 H B F

Individual Data: IND STAT C R I S R N R

Ln Sf SSN Val First Name Last PA MA FS R S B A E K M

01 01 8 LESLIE RJ RJ RJ N N N V U

02 01 8 DAVID RJ RJ RJ N N N N

03 01 UNBORN CL CL CL

04 01 8 JULISSA RJ RJ RJ N N N V N

05 01 UNBORN CL CL CL

To View Match Detail Enter Appropriate Number

Match Codes: 1=WRS 2=UIB 3=SSA 4=HIRE 5=BANK 6=FIRM

Next Case # CMD

A0267 UNRESOLVED RFI DATA EXISTS FOR THIS CASE RFI

225, 2 VT500-7 -- M91PZZ 00:48:23 Num

Figure 3

B. Payroll Management System

The investigator should promptly request the client's Payroll Management System employment report from the agency liaison by filling out the Payroll Management System Request Form (BFI-154) (Attachment 1). The Payroll Management System report should be requested for as long as the client has been active for benefits and should include all overtime and other employment income.

C. Budgeting

When the payroll information is received, the investigator must budget the income. This step requires the investigator to review the WMS screens, HRA One Viewer, Paperless Office System (POS) comments section, and the Enterprise Data Warehouse (EDW) Grant Profile, and determine the household size. In addition, the investigator must recognize households that are budgeted using the 130% or 200% Federal Poverty Level (FPL) test. When there is an elderly, disabled or blind person in the household, or when the client has an out-of-pocket child care expense, a 200% FPL test is utilized. In all other instances the budget is calculated at 130% FPL.

Determining the Claim Period

The claim period is the period of time that an overpayment was made and for which reimbursement is sought. It is important to determine how far back an overpayment was made and the start month for the claim. Determine the first month of overpayment by reviewing the client's application.

For information left unreported or inaccurately reported in the application, the initial month of overpayment is the month the application for SNAP benefits was submitted. This includes changes that occurred between the date of the application interview and the date eligibility was determined.

Example: If an applicant household applies on January 10, is accepted for SNAP benefits on February 1, but failed to report household circumstances known to him/her at the time of the application process, the initial month of overpayment would be January.

Three Types of Change Reporting

1. 10-day Reporting Rules – for SNAP only cases (also referred to as 10-10-10)

This discrepant information relates to a situation that began while the client was receiving assistance. The first month of overpayment for changes that were not reported by a 10-day reporting client is the second month after the month in which the change occurred.

Example: If the change occurs April 15, the start date determined for the overpayment is June.

This allows for the SNAP reporting standard of 30 days, which is the timeframe applied if the change is reported on time. The timeframe includes the 10 days after the end of the calendar month in which the change occurred for the participant to report the change, 10 days for case action(s), and 10 days for timely notice (i.e., 10-10-10).

The following households are subject to 10-day reporting rules:

- Households certified for less than four months
- Households with no income and applying only for SNAP
- Group home residents in receipt of SSI or SSD
- Migrant or seasonal farm-worker households
- Homeless households (Shelter code 23)
- Households in which all adult members are over the age of 60 or disabled and all income is unearned

Between contact points (e.g., periodic reports, recertification) 10-day reporting clients must report changes within 10 days after the calendar month in which the change occurred.

Example: A client received income from a new source on February 15, 2013, but did not report it. The client should have reported the change by March 10, 2013 (10 days after the end of the calendar month in which the change occurred).

2. 6-month Reporting Rules

All SNAP households who do not fall under the 10-day reporting rule criteria are classified as 6-month reporting households. A 6-month reporting household must report current household circumstances and income:

- At recertification interviews.
- When an increase in income causes the household's income to exceed 130% (or 200% where applicable) of the poverty level for the household size for any calendar month. This report must be made within 10 days after the end of the calendar month in which the income increase was received.
- During the sixth month of the household's certification period referred to as six-month contact.

Once the budget is completed, the investigator will determine an overpayment amount, if any.

3. 24- month Reporting Rules

Households consisting entirely of unemployable or elderly and/or disabled persons with very stable income and no earnings, may have their eligibility certification period up to 24 months. Local districts must have contact with these households at the 12 month points.

Example: The 24 Month Reporting Rule will occur most often for Social Security, SSI, disability or pension recipients.

Calculating the Amount of the Claim

The SNAP overpayment claim is the difference between the SNAP benefits the household received and the benefits it was eligible to receive. The investigator uses the information gathered to calculate the claim period and the amount of the claim.

The investigator prepares a claim package.

1. Complete and Print the BFI 138 – Case Action Referral.
2. Complete the BFI 21B – Final Report of Investigation.
3. Prepare SNAP CR package to include the following:
 - Coversheet – BFI 21D
 - Report of Investigation – BFI 21B
 - WMS Screens - 22, 22x
 - WMS Recoupment Screen - 10
 - WMS Budget History List Screen- 20
 - Archives/WMS Benefit Issuance Screens
 - Budget Computation Sheet (FIA Forms – W122A, W122D)
 - Recertification/Application
 - Employer Payroll
 - Payroll Management System Report
 - Data Warehouse Archive Printout
 - Call-In Letter
 - CR form
4. Submit Package to supervisor for review.

Supervisory Review

1. Supervisor reviews the disposition detail and budget in IRIS
2. Reviews the following in the SNAP CR package:
 - Report of Investigation – BFI 21B
 - Archives/WMS Benefit Issuance Screens
 - Payroll Management System Report
 - Recertification/Application
 - WMS Screen 20 – Budget History List
 - Budget Computation Sheet
 - SNAP Worksheet
 - Call-In Letter
 - Recoupment Screen
 - Current WMS Screens – 22 and 22x
3. If claim package is incorrect or incomplete, supervisor returns the case to the investigator with instructions for corrective action.
4. If package is correct, supervisor signs off on Case Action Referral Form – BFI 138.
5. Supervisor signs off Report of Investigation – BFI 21B.
6. Supervisor decontrols package in IRIS and submits to CAIII for log in.

D. SNAP applications, recertifications, and employment letters

The investigator must review the final budget and payroll information against the most recent client SNAP applications, recertifications, and employment letters. The budget, along with the information the client provided to the agency, will determine the appropriate investigative disposition.

E. Interview

[REDACTED]

F. Referral for Criminal Prosecution

If the client concealed their income at the time of the application or recertification, and BFI has a complete signed application or recertification, the investigator must consider referring the case for criminal prosecution. The issues to consider include the amount of the concealed income, whether the client provided false or misleading employment letters, and the extent of the concealment. [REDACTED]

[REDACTED]

Each case where there is a possibility of DA referral, the case should be discussed with the supervisor, and if appropriate, with a member of the Prosecutions unit.

[REDACTED]

G. Referral for Intentional Program Violation

When the client failed to update the agency of their increased income between recertification periods, the investigator must consider referring the case for an Administrative Disqualification Hearing (ADH). The ADH determines if the client committed an Intentional Program Violation (IPV). The SNAP rules require that a client whose household income exceeds 130% (or 200% where applicable) of the Federal Poverty Level, report the increased income within 10 days of the end of the month that the income is earned. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

H. Voluntary Recovery

Investigators should seek voluntary recoveries only in two types of cases:

1. When there is an overpayment and the documents necessary for DA referral or IPV are not available.
2. When the client reported their income to the agency but it was not properly budgeted.

In each case the client will be informed that they have received an overpayment of SNAP benefits and given the opportunity to pay the full amount of the overpayment.

I. SNAP Case Closing

Cases where the client is ineligible for benefits at the time of the investigation, should be referred for case closing to the SNAP Center. In addition, cases where the client is asked to bring their payroll information to the interview, and the client does not appear, should be closed for failure to provide verification.

J. Referral for Rebudgeting, Recoupment or Deferred Recoupment

[REDACTED]
[REDACTED]
[REDACTED]

When there is an agency error and the client remains eligible for benefits, the case should be referred for both rebudgeting and recoupment. When the client received an overpayment as a result of an agency error, and their SNAP case is closed, OTDA requires that the agency establish a claim in the amount of the overpayment.

ATTACHMENT 1

Payroll Management System Request Form (BFI-154)

BFI-154 (E) 08/21/2012



INVESTIGATION REVENUE AND
ENFORCEMENT ADMINISTRATION
BUREAU OF FRAUD INVESTIGATION
250 CHURCH STREET, 3RD FLOOR
NEW YORK, N.Y. 10013

DATE: _____

TO: _____, Deputy Director

FROM: Investigator _____
Supervisor _____ Extension _____

SUBJECT: REQUEST FOR CITY EMPLOYMENT PAYROLL

|||||

Case Name: _____ Case Number: _____

Name of Subject: _____ Date of Birth: _____

Social Security Number: _____ Period of Request: _____

WMS Address: _____

Results: _____
