Informational Letter

Section 1

Transmittal:	14-INF-05
To:	ROS Local District Commissioners
Issuing Division/Office:	Center for Employment and Economic Supports
Date:	January 28, 2014
Subject:	Resource File Integration (RFI) Policy and Procedures
Suggested Distribution:	ROS Temporary Assistance (TA) Staff ROS Supplemental Nutrition Assistance Program (SNAP) Staff ROS Employment Coordinators ROS Fraud Directors ROS Resource Unit Directors ROS WMS Coordinators ROS Staff Development Coordinators
Contact Person(s):	Temporary Assistance Policy Questions: 1-800-343-8859 ext. 4-9344 Supplemental Nutrition Assistance Program Policy Questions: 1-800-343-8859 ext. 3-1469, RFI Systems Questions: 1-800-343-8859 ext. 6-6100
Attachments:	RFI Posting Schedule-Upstate RFI Resolution Codes-Upstate RFI Upstate System Resource File Integration (RFI) Resources
Attachment Available On – Line:	☒

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
06-ADM-13 05-ADM-06 08-INF-08 06-INF-10 04 INF-20 02 INF-29	None		SSL 134-a	TASB Chapter 5, Section F	WMS/CNS Coordinator Letter March 5, 2009 NYC Policy Directive

91 INF-25					#10-30-OPE
10-LCM-17					
09-LCM-01					
03 LCM-02					
94 LCM-05					

Section 2

I.   Purpose

The purpose of this release is to provide Rest of State (ROS) social services districts (SSDs) with an informational reference regarding Resource File Integration Subsystem (RFI) policies and functionality.

II.   Background

In an effort to provide SSDs more comprehensive data with which to make accurate and timely eligibility determinations and benefit payments, Federal and State law mandate a computer match process be established to facilitate review of applicant/recipient earned income, unearned income and/or resource information.

In 1984, RFI was added to the Welfare Management System (WMS) as a sub-system, which compares certain data on WMS files with the files of governmental agencies and financial institutions. Since implementation, a number of different computer matching processes have been added to the RFI system.

Currently, the New York State Office of Temporary and Disability Assistance (OTDA) participates in computer matching with a number of State and Federal agencies as well as some financial institutions including: the New York State Department of Labor for Unemployment Insurance Benefit information; the New York State Department of Taxation and Finance for earned income information; and the Social Security Administration for information that is used to verify a variety of data including Social Security Income.

The information available to SSDs via RFI has proven valuable in determining and monitoring eligibility determinations and benefit issuance as well as aiding in potential fraud investigations.

New York City protocols regarding RFI policy and procedures are located in Family Independence Administration (FIA) release Policy Directive #10-30-OPE: "Clarification Regarding Computer Matches." NYC staff must continue to follow that directive as the NYC operational policy is specific to FIA.

III. Program Implications

A. Need for Accurate Social Security Numbers

Social Security Numbers (SSNs) in WMS are used as the primary identifier in the computer matching process, including RFI. Therefore, it is essential that SSNs in WMS be accurate.   Inaccurate or non-entered SSNs may result in income and resource information not being verified or budgeted and could result in overpayments of assistance.

As a condition of eligibility applicants/recipients are required to provide an SSN. Those individuals who do not have an SSN must apply for a SSN with Social Security Administration (SSA). Individuals who do not comply with the requirement to provide an SSN are not eligible for Temporary Assistance.

To assist SSDs in assuring that SSNs are present, accurate in WMS and data entered timely when appropriate, system-generated management reports are available through Benefit Issuance Control System (BICS).

SSDs must use this report as instructed in 02-INF-29: "Necessity of Accurate Social Security Numbers in the Welfare Management System," Section 2(III)(C).

B. RFI Component Matches

The following is a brief description of the matches that are currently reported on RFI using an individual's SSN:

1. <u>WRS</u>: Wage Reporting System. Wage information is received from the New York State Department of Taxation and Finance. This match is performed daily for applicants, and monthly for recipients. The amount reported is for an entire quarter.

2. <u>NHR</u>: State Directory of New Hires. New Hire (W-4) Reporting information is received from the New York State Department of Taxation and Finance for applicants on a daily basis and for recipients on a monthly basis. See 03 LCM-02: "New Hires Match," for more detailed information on the State NHR match.

3. <u>UIB</u>: New York State Department of Labor matches individuals who are identified as being in receipt of unemployment insurance benefits. This match is done daily for applicants and monthly for recipients.

4. <u>BENDEX (BDX)</u>: This match with the Social Security Administration (SSA) provides information on individuals eligible for benefits under the Retirement, Survivor or Disability Insurance (RSDI) Program or Title II. Matches are performed daily for applicants and monthly for recipients.

5. <u>FIRM</u>: This is a State developed alternative system used primarily for TA and Medicaid (MA) to identify financial resources (primarily bank and credit union accounts). FIRM data is posted weekly for recipients only. Applicants are not part of this match process. See 05-ADM-06: "Temporary Assistance (TA) and Medicaid

(MA) Financial Institution Recipient Match (FIRM): Implications for TA, MA and Food Stamps (FS)," for more detailed information on the FIRM match.

6. <u>VED</u>: The Verified Employment Data information comes from data that has been verified using the National Directory of New Hires (NDNH) process. This match is performed for adult TANF recipients only, and is performed monthly. See 08-INF-08: "Verified Employment Data (VED) Information Added to Upstate RFI," and 06-ADM-13: "National Directory of New Hires (NDNH) Computer Match," for more detailed information on the VED match.

RFI matches occur at different times because of Federal and State mandates for the frequency of each match. Computer matches are performed as follows:

Search	Applicants	Recipients
WRS*	Daily	Monthly
NHR	Daily	Monthly
UIB	Daily	Monthly
BDX**	Daily	Monthly
FIRM**	Not done	Monthly
VED***	Not done	Monthly

- *Access to quarterly wage information begins approximately six weeks after the completion of the quarter.
- **The monthly match only includes new recipients to WMS, recipients who have been closed 3 months to be deleted from the exchange, and those recipients who have had some WMS change.
- ***Financial match for all recipients is completed by the end of each quarter.
- ****Verified Employment Data – Based on a match to NDNH data and the independent verification of the employment information by OTDA.

See Attachment II: "RFI Posting Schedule-Upstate"

C. Primary or Secondary Source of Information

Some RFI matches are considered verified upon receipt and others must be followed up to obtain documentation of the income or resource information before case action may be initiated.

A computer match is considered verified upon receipt when a match comes from a primary source such as the Department of Labor (UIB) and Social Security Administration (RSDI or SSI). There is no need for the SSD to independently verify the information provided through the match before initiating a case action, such as, a reduction or discontinuance of assistance, as long as the data is current (within 60 days of date of case action), and the SSD has reason to believe that the information from the match is valid.

The accuracy of the RFI information must be verified before initiating any case action when a computer match involves a secondary source, such as the Wage Reporting System (WRS). The SSD must obtain documentation to verify the match information from the applicant, recipient or a primary source (for WRS the employer). For more information see 04-INF-20: "Temporary Assistance Policy: Computer Matching Clarification," 06-INF-10: "Computer Matching Clarification for Food Stamps," and Attachment IV: "Resource File Integration (RFI) Resources."

D. Resolution of RFI Flags

When an individual is found to have a computer matching-related resource or income information, from one of the above sources, WMS sets a flag preventing further case processing until the RFI is resolved. The SSD must input a resolution code that indicates what action was taken on the case based on the RFI information.

SSDs must not resolve RFI matches using resolution code "2": Current Case Data is Correct," to expedite case processing, even if there is an expectation that staff will later assess the RFI match and adjust the benefit. There are significant federal financial penalties associated with improper resolution of some of the RFI matches. Accordingly, OTDA, on a regular basis, conducts reviews that include an evaluation of RFI matches in case files.

See Attachment I: "RFI Resolution Codes-Upstate"

E. Procedures for Resolution of RFI

The following steps are completed when resolving RFI computer matches:

1. Review the RFI information against case file and assess its impact on eligibility and benefits. For applicants, this review must be completed before benefits are issued. For recipients, follow-up on all matches must be completed within 45 days of the SSDs receipt of a match.

2. For matches considered verified-upon-receipt, analyze the verification to determine what case action, if any, should be taken, i.e., no case change, case re-budgeted, case closed, etc. SSDs must explain why the specific case action was taken and document the explanation in the case record. This is required regardless of the RFI resolution code used.

3. For matches NOT considered verified-upon-receipt, SSDs must verify the information provided in the match. This may include contacting an employer or financial institution.

   Once verification has been received, analyze the verification to determine what case action, if any, should be taken, i.e., no case change, case re-budgeted, case closed, etc. SSDs must explain why the specific case action was taken and document the explanation in the case record. This is required regardless of the RFI resolution code used.

4. Input the proper RFI resolution code that coincides with the case action, into the RFI subsystem. Any case with an RFI match must have an explanation for its resolution.

5. SSDs must maintain evidence of RFI documentation. For example, SSDs can copy the resolved RFI and supporting documentation and retain the information in the case record and/or document imaging systems such as I/EDR and OnBase.

6. There are several reports SSDs should utilize to monitor the resolution of RFI matches. Additional information regarding the available reports can be found in Section F (ROS) and Section G (NYC) of this document.

F. RFI Management Reports-Rest of State (ROS)

Management reports provide a detailed overview of information that appears on RFI screens and are valuable tools that can be used by eligibility workers, supervisors and administrative staff to facilitate and expedite the resolution of unresolved matches as well as aid in potential fraud investigations. The following is a listing of management reports available through the RFI Menu in WMS and through WMS Batch Reports:

1. Option 11 – RFI Quick Print Menu:

   a. WINR0850: "Unresolved Hits by Case Name":

      This report lists unresolved resource matches for clients by case name.

      - Eligibility workers can select the "worker" filter and use it to identify what resource matches are outstanding and still need resolution

      - Supervisors can select the "office", "unit" or "worker" filter and use it to determine if there are backlogs in an office, unit or with a particular worker.

      It is strongly recommended that SSDs review this report on a daily basis and take any required action to ensure the information is used to support the timely processing of RFI information.

   b. WINR0851: "Resolved and Unresolved Hits by Case Name":

      This report provides a comprehensive overview of unresolved and resolved resource matches for clients by case name.

      - Eligibility workers can select the "worker" filter and use it to identify all resource matches that have come in for a particular case.

- Supervisors can select the "office", "unit" or "worker" filter and use it to identify all resource matches that have been posted for cases assigned to their office, unit or to a particular worker.

It is strongly recommended that SSDs review this report on a daily basis and take any required action to ensure the information is used to support the timely processing of RFI information

c. WINR0852: "Unresolved High Risk Hits by Case Name":

This report lists unresolved resource matches for clients by case name where the WRS resource is:

- greater than $3,000 for Temporary Assistance cases

- greater than $5,000 for SNAP and Medicaid cases.

This report was designed to identify those WRS matches that could pose the highest risks of incorrect eligibility determinations.

- Eligibility workers can select the "worker" filter and use this report to identify which unresolved resource matches in their caseload have the highest potential to affect eligibility, due to the high income amount

- Supervisors can select the "office", "unit" or "worker" filter and use this report to identify which unresolved resource matches in their caseload have the highest potential to affect eligibility, due to the high income amount, and also determine if there are high risk backlogs in an office, unit or with a particular worker.

It is strongly recommended that SSDs review this report on a daily basis and take any required action to ensure the information is used to support the timely processing of RFI information.

2. WMS Batch Reports:

a. WINR9161: "New Hires Match Report":

This report lists clients who have recently filed a W-4 with an employer. It is useful to identify those clients that MAY have recent employment that may not have been reported.

It is strongly recommended that SSDs review this report on a monthly basis.

G. RFI Management Reports-NYC

Information regarding RFI Management Reports for NYC is found in HRA Policy Directive #10-30-OPE: "Clarification Regarding Computer Matches."

H. Computer Records Security

SSDs are required to assure appropriate protection, access to and disclosure of confidential information maintained in State and County systems/databases. See 09-LCM-01: "Protection of Confidential Information and 10-LCM-17: Use and Protection of Confidential Information," for a review of protocols in this area. This includes information generated through RFI.

Note: Matching of UIB data from DOL is covered by a Memorandum of Understanding (MOU) that has been signed with DOL to provide electronic matching of TA and SNAP applicant and recipient UIB to SSDs. SSDs must ensure the proper use and safeguarding of this UIB information. A separate directive will be released that provides SSDs information on the UIB match process, including the safeguarding of UIB information.

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