



DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

April 18, 2012

Auditor Suzanne M. Bump
State House, Room 230
Boston, MA 02133

Dear Auditor Bump,

Thank you for contacting me and other members of the Electronic Benefit Transfer (EBT) Card Commission to inform us about your audit, and to recommend that the Inspector General's audit, as outlined in the recommendations of the final EBT Commission Report, commence after the results of your audit are provided.

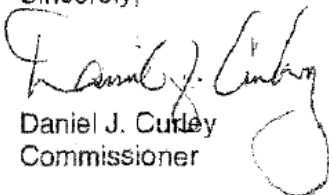
As you know, the Office of the Inspector General has agreed to delay their audit work until the Office of the State Auditor (OSA) has completed its review. The Department of Transitional Assistance (DTA) believes that both audits will provide valuable information on how to build on the current program integrity capabilities of DTA. As we discussed last week, our staff will provide full assistance to both your office and the Inspector General's office to complete your work.

Once the OSA audit is complete, and the findings are reviewed, DTA and the Office of the Inspector General will complete a memorandum of understanding (MOU), so that the Inspector General can proceed to make arrangements in accordance with the recommendations of the EBT Commission.

DTA is always looking for ways to improve program integrity, and appreciates your assistance.

Thank you,

Sincerely,



Daniel J. Curley
Commissioner

Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston MA 02111

JUDYANN BIGBY, M.D.
Secretary

DANIEL J. CURLEY
Commissioner

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OFFICE OF THE INSPECTOR GENERAL



The Commonwealth of Massachusetts
Office of the Inspector General

GREGORY W. SULLIVAN
INSPECTOR GENERAL

April 4, 2012

JOHN W. MCCORMACK
STATE OFFICE BUILDING
ONE ASHBURTON PLACE
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BOSTON, MA 02108
TEL: (617) 727-9140
FAX: (617) 723-2334

The Honorable Suzanne M. Bump, Esq.
Auditor of the Commonwealth
One Ashburton Place, Room 1819
Boston, MA 02108

Dear Auditor Bump,

I agree with the recommendation in your letter dated April 2, 2012 to delay any study of the Electronic Benefit Transfer (EBT) program pending the outcome of your scheduled audit of the Department of Transitional Assistance (DTA). I believe this action will allow for a better understanding of the current system of policies and controls.

You have indicated that your audit will include "an evaluation of the controls and practices governing the DTA's public assistance programs, including cash assistance, and food stamps." You also state that "Areas to be explored include eligibility determinations, the use of EBT Members of the Electronic Benefits Transfer (EBT) Card Commission cards, and controls used to prevent the misuse of EBT cards by clients and vendors, and the use of data to make informed decisions on the efficient and effective use of resources."

I agree with you that the results of your audit will help to better inform the conversation regarding appropriate methods of strengthening DTA's eligibility determination systems. As such, and in an effort not to duplicate efforts using taxpayers' funds, I will await your audit and recommendations before proceeding any further with a study.

I look forward to discussing your recommendations at such time as they are available.

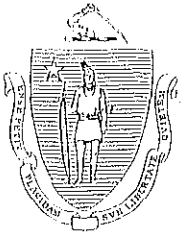
Respectfully,

A handwritten signature in black ink that reads "Gregory W. Sullivan".

Gregory W. Sullivan
Inspector General

Cc: The Honorable Jennifer L. Flanagan

The Honorable Robert L. Hedlund
The Honorable Russell E. Holmes
The Honorable Shaunna L. O'Connell
Commissioner Daniel J. Curley
William Rennie
Priscilla Holmes



The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

ONE ASHBURTON PLACE, ROOM 1819
BOSTON, MASSACHUSETTS 02108

SUZANNE M. BUMP, ESQ.
AUDITOR

TEL: 617-727-6200
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April 2, 2012

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OFFICE OF THE INSPECTOR GENERAL Commissioner Daniel J. Curley
Department of Transitional Assistance
600 Washington Street
Boston, MA 02111

Senator Jen Flanagan
State House, Room 410
Boston, MA 02133

Senator Bob Hedlund
State House, Room 313C
Boston, MA 02133

Gregory W. Sullivan
Inspector General
One Ashburton Place, Room 1311
Boston, MA 02133

Representative Russell Holmes
State House, Room 254
Boston, MA 02133

William Rennie
Vice-President
Massachusetts Retailers Association
18 Tremont Street, Suite 810
Boston, MA 02108

Representative Shaunna L. O'Connell
State House, Room 237
Boston, MA 02133

Priscilla Holmes
Worcester Community Action Coalition Council
484 Main Street, Second Floor
Worcester, MA 01608

Dear Members of the Electronic Benefits Transfer (EBT) Card Commission:

I read with interest the draft report produced by your commission and I commend you on your efforts with respect to studying the use of EBT cards and making recommendations for stronger oversight.

One of your recommendations, that the "Department of Transitional Assistance (DTA) and the Office of the Inspector General (OIG) will sign a memorandum of understanding to determine the scope of a study to be conducted by July 1, 2012 . . . [to] review the eligibility determination in DTA cash assistance programs" was of particular interest. As I understand it, at least one outcome of this project is expected to be a recommendation as to commercially available software which may assist DTA in its work. I respectfully suggest that the value of such a process would be enhanced if it was preceded by an audit by this office of DTA's current system of policies and controls. Such an audit is scheduled to commence within the week.

April 2, 2012

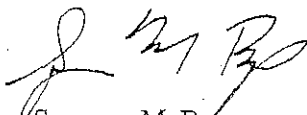
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The scope of our audit, which will cover an audit period of 7/1/10 through 12/31/11, includes an evaluation of the controls and practices governing the DTA's public assistance programs, including cash assistance, and food stamps. Areas to be explored include eligibility determinations, the use of EBT Members of the Electronic Benefits Transfer (EBT) Card Commission cards, and controls used to prevent the misuse of EBT cards by clients and vendors, and the use of data to make informed decisions on the efficient and effective use of resources. My staff has completed necessary pre-audit planning, and I have notified DTA Commissioner Curley that our audit work will be commencing this week.

I believe the results of this audit – which will provide an evaluation of the strengths and weaknesses of the systems of eligibility determination, program integrity, monitoring and compliance – will provide important information to inform any study geared toward determining appropriate methods of strengthening DTA's eligibility determination systems, which I understand to be the goal of the joint DTA/OIG study. For that reason, I respectfully recommend that the commission delay commencing the MOU between the DTA and the OIG and related study until the completion of our audit.

I would be happy to discuss the audit and my recommendation as your convenience.

Sincerely,



Suzanne M. Bump

cc: His Excellency Deval L. Patrick, Governor