



# Richmond City Council

The Voice of the People

Richmond, Virginia

## Office of the Inspector General

September 20, 2023

Mr. Lincoln Saunders  
Chief Administrative Officer  
City of Richmond

The Office of the Inspector General (OIG) has completed an investigation within the Department of Social Services, as it relates to the abuse of authority. This report presents the results of the investigation.

### **Allegations:**

1. A Department of Social Services (DSS) employee processed a Supplemental Nutrition Assistance Program (SNAP) application and was not authorized in violation of Admin Regulation 5.18.II.B.12 Material falsification of any city document or employment application.
2. The subject employee emailed the DSS client's personal and confidential information to a private Yahoo email address. This is in violation of City Admin Regulations 1.8.III Confidential and Non-Disclosure Policy, 2.6.II.B.1.C Electronic Information Security, and 2.7.III.C Use of Computer Equipment.

### **Legal & City Policy Requirements:**

1. City Code § 2-214 authorizes the Office of the Inspector General to conduct criminal, civil, and administrative investigations relating to the municipal affairs of the City.
2. City Admin Regulation: 5.18.II.B.8: Conduct unbecoming an employee of the city tending to bring the city service into disrepute.
3. City Admin Regulation: 5.18.II.B.12: Material falsification of any city document or employment application.
4. City Admin Regulation: 1.8.III: Confidentiality and Non-Disclosure Policy. "Not to expose customers' or employees' confidential information (such as social security number, driver's license number, and credit card data or account information)."

5. City Admin Regulation: 2.6.II.B.1.C: Electronic Information Security. "Confidential information is private or otherwise sensitive in nature and must be restricted to those with a legitimate business need for access. Unauthorized disclosure of this information to people without a business need for access may be against laws and regulations or may cause significant problems for the COR, its customers, or its business partners. Decisions about the provision of access to this information must be cleared through the information Owner. Examples are customer transaction account information and worker performance evaluation record."
  
6. City Admin Regulation: 2.7.III.C: USE OF COMPUTER EQUIPMENT. "Under no circumstances is an employee of the COR authorized to engage in any activity that is illegal under local, state, federal, or international law while utilizing COR-owned resources."

### **Findings:**

The investigator was advised by DSS management that a DSS employee identified as a Human Services Technician Senior, assigned to VCU Medical Center, processed an application for SNAP benefits on November 17, 2022. The employee's duties are to process Medicaid applications for individuals in the VCU Medical Center. The subject employee signed the semi-annual dedicated worker certification form which certifies the subject employee dedicated their time to Medicaid/FAMIS allowable activities. SNAP is not a Medicaid/FAMIS activity. He/she was not authorized to process SNAP applications without a supervisor's approval.

On July 24, 2023, the investigator interviewed the subject employee about the processing of the SNAP application on November 17, 2022. The subject employee stated while he/she was walking to Marshall Plaza an unknown individual approached her in front of Marshall Plaza complaining about not receiving help. The subject employee said he/she took the SNAP application along with the phone number from the unknown individual. The subject employee returned to the office in VCU Medical Center and processed and approved the SNAP application. The subject employee said they did not know the individual who approached them and that the individual must have seen their City of Richmond ID card. The subject employee was asked why he/she did not take the application into Marshall Plaza to be processed by the intake unit and the subject employee did not answer the investigator.

The subject employee further stated he/she returned to their office in the VCU Medical Center and called the unknown individual from their personal cell phone to process the SNAP application and verify the unknown person's income. The subject employee stated while processing the application he/she made a mistake and did not enter the client's income correctly. The subject employee stated they used the quarterly income of \$9,200.60 from the Virginia Employment Commission (VEC) and made that income the yearly income. This is in violation of Admin Regulation 5.18.II.B.12 Material falsification of any city document or employment application.

The investigator reviewed the documents prepared by the subject employee in order to process the SNAP application. The subject employee generated a Work Number Detail Report on November 17, 2022, which showed employer information, and the weekly and annual income of the applicant. The subject employee would see that the income exceeded the required amount to receive SNAP benefits. The eligible income for a single person is \$2,265 per month or \$27,180 per year and the unknown individual income was \$34,600.16 as of November 17, 2022. This exceeded the maximum income by \$7,420.16.

The subject employee processed this SNAP application outside the standard operating procedure for the Department of Social Services. Once the subject employee verified the income from the Work Number Detail Report it was not necessary to perform a VEC report because the income was already available to the subject employee. This is in violation of City Admin Regulations 5.18.II.B.12 Material falsification of any city document or employment application.

The investigator interviewed the individual that allegedly approached the subject employee in front of Marshall Plaza. The individual stated that he/she went into Marshall Plaza and processed their SNAP application on the first-floor intake. The individual said they did not meet any City employee in front of Marshall Plaza, nor did they complain to anyone in front of Marshall Plaza. The individual was asked if he/she knew the subject employee and the response was they did not know the subject employee. The individual was asked about the telephone call that was made by the subject employee to the individual on October 27, 2022, and he/she said they did not have a call with anyone at that time. He/she did admit to making numerous calls between May 8, 2023, and May 10, 2023. The individual stated he/she made these calls to find his/her case worker.

Both the subject employee and the unknown individual were questioned about contacting each other on social media. The subject employee and the unknown individual denied knowing each other on social media even though there was communication between them. This information was publicly available on their social media accounts.

The investigator conducted an analysis of the subject employee's City email and discovered emails of DSS client's personal identification, including social security numbers, were being sent to a private Yahoo email address. This violates the City's Admin Regulation 1.8 Confidentiality and Non-Disclosure Policy, 2.6 Electronic Information Security Policy, and 2.7 Use of Computer Equipment.

Based on the totality of the circumstances, contradictory statements by the subject employee and the applicant, false information reported on the SNAP application, failure to follow proper SNAP application procedures, and the unauthorized actions performed outside the scope of his/her position. This resulted in the loss of City and State funds that were paid to an ineligible recipient. These actions are in violation of Admin Regulation 5.18.II.8 Conduct unbecoming an employee of the city tending to bring the city service into disrepute.

**Conclusion:**

Based on the findings, the OIG concludes that the allegation is substantiated. The OIG recommends appropriate disciplinary actions be taken regarding this matter in consultation with Human Resources.

If you have any questions, please contact me at extension 1840.

Sincerely,



James Osuna  
Inspector General

cc: Traci DeShazor, DCAO Human Services  
Shunda. Giles, Director, Social Services  
Honorable Members of City Council