



**Rhode Island Department of Human
Services
Corrective Action Plan in Response to FNS
Advance Notice Letter
Dated November 8, 2016**

Submitted November 22, 2016

SUMMARY OF CORRECTIVE ACTION PLAN ITEMS, ASSIGNED LEAD(S) AND TIMEFRAME

#	Action Item	Responsible Person(s)	Timeframe for Completion
1	Correct technical problems with Integrated Eligibility and Enrollment System (RI Bridges)	Tamil Balakrishnan, Deloitte	October 2016 - June 2017
2	Address ongoing training needs	Melba Depeña Affigne, RI DHS Stephen Jackson, Deloitte	November 14, 2016 – January 23, 2017
3	Improve business processes including: <ul style="list-style-type: none"> • triage and prioritization of SNAP cases both expedited and non-expedited • elimination of case backlogs • restoration of benefits where appropriate 	Ben Shaffer, RI DOA Jeff Walker, Deloitte	October 2016 – June 2017
4	Reduce office overcrowding and wait times	Melba Depeña Affigne, RI DHS Stephen Jackson, Deloitte	October 3, 2016 – December 30, 2016
5	Address Call Center Outages Improve Call Center Business Process	Zach Sherman, Health Source RI Thom Guertin, RI DOA Kim Brito, RI DHS Kevin Simpson, RI DHS	Outages - Completed Call Center Improvement - January 2017
6	Provide accurate & timely notices	Jennifer Wood, RI EOHHS Tamil Balakrishnan, Deloitte	November 30, 2016
7	Ensure access to interpreters & translated materials	Zulma Garcia, RI DHS	Completed
8	Ensure Quality Control Process and Program Integrity Measures	Tamil Balakrishnan, Deloitte Iwona Ramian, RI DHS	Interim Business Process in Place -November 30, 2016 RIB ridges Capability – February 2017
9	Deferred Functionality Timeline	Tamil Balakrishnan, Deloitte Thom Guertin, RI DOA	January 2017 through May 2017
10	Data Collection and Reporting (Appendix)	Jeff Walker, Deloitte Ben Shaffer, RI DOA Kevin Simpson, RI DHS	Weekly submissions

CORRECTIVE ACTION PLAN

Introduction:

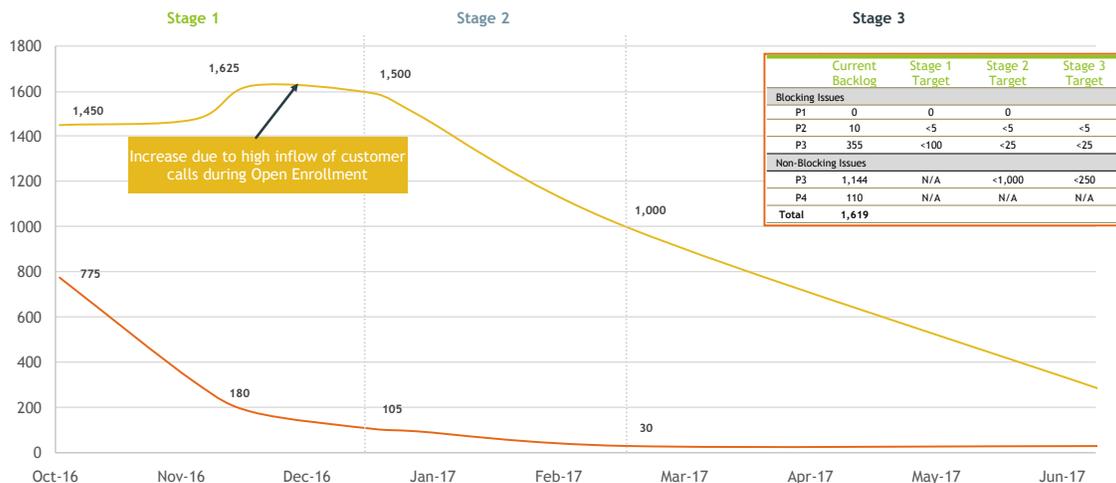
Rhode Island has carefully reviewed the Notice Letter provided on November 8th and has developed the below detailed Corrective Action Plan in response to all elements identified in the letter. Should any clarifications or additional information be useful to FNS in reviewing this Corrective Action Plan, Rhode Island stands ready to provide any additional material that will be of assistance in making progress and improvements clear and transparent.

Section 1: Correct System Technical Problems

Prior to the launch of the new Integrated Eligibility and Enrollment system, RI Bridges, Priority 1 (P1) software defects were reduced to zero. Priority 2 (P2) defects that may affect large groups of customers, and are thus categorized as blocking issues, were scheduled to be reduced to less than 5 by the end of December and have already been reduced to 4 through a series of software modifications implemented since Go Live. Priority 3 (P3) issues which affect a sufficient number of customers to be considered blocking issues will reduce to fewer than 100 by the end of December and fewer than 25 by the beginning of March. This reduction reflects an overall reduction of all defects, including both new defects that arise as a result of new code being developed in ongoing releases and those that remain from the Go Live period. P3 and P4 defects or data anomalies that affect only a single customer or a small group, and are therefore considered non-blocking, will be reduced to a stable level of less than 250 at all times post June 2017, even as new maintenance releases are implemented. These levels will deliver a stable operating system at a defect level and within the timeframe that meet or exceed industry standards for a system integration initiative of this scope and complexity.

System Issue Resolution Plan

The plan to resolve system blocking issues and non-blocking issues will span the 3 stages of system maturity.



Blocking Issues: An issue blocking a customer from getting benefits or health coverage (includes P1, P2 and some P3)

Non-Blocking Issues: A system issue that has a work around (includes all other P3)

Total Priority 2 Incidents (P2s)

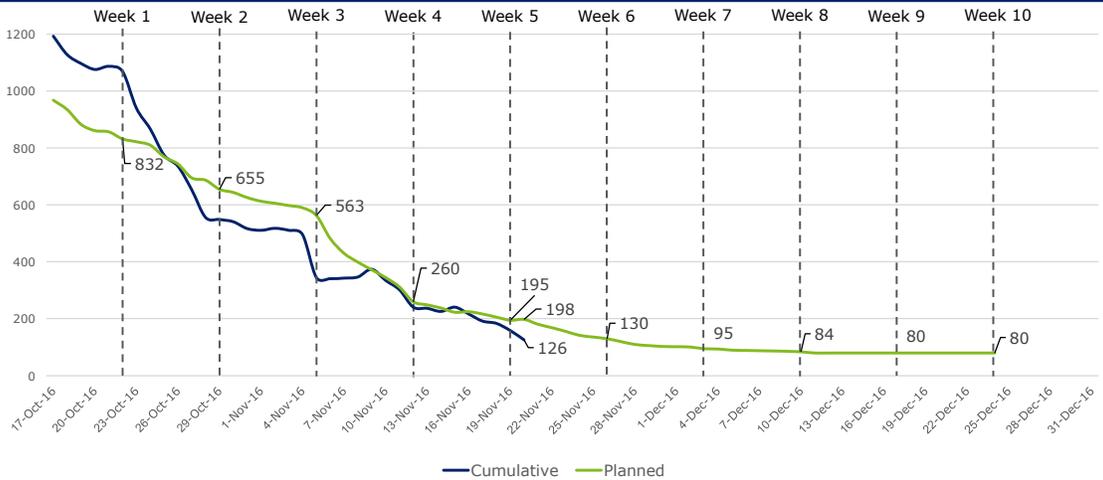
Priority 2 Tickets – Plan vs. Actual



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Cumulative Blocker Incidents (P2s & P3s)

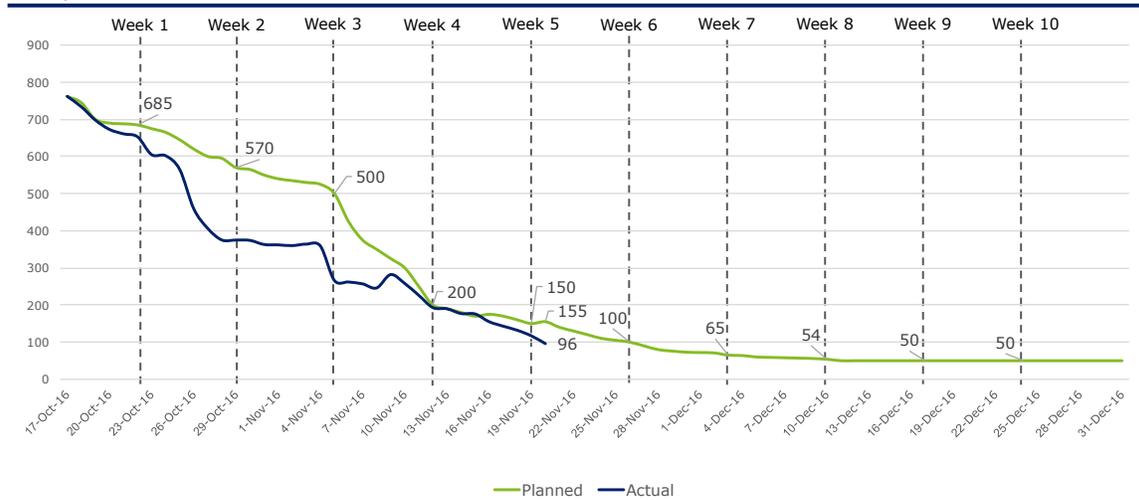
Priority 3 Tickets



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DHS Blocking Priority 3 Incidents (P3s)

Priority 3 Tickets – Plan vs. Actual



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Section 2: Address Ongoing Training Needs

Training for staff was conducted in two rounds prior to RIB ridges Go Live starting in Spring 2016. We conducted several computer literacy trainings to enhance our employees' computer skills and improve their comfort level using new technology in the new system. We also provided a series of cross-training opportunities to expand knowledge of all programs; childcare, SNAP, RIW, GPA, Medical, etc. Training continues through refresher training since Go Live as demonstrated by the ongoing schedule of trainings illustrated below. One of the two rounds was strategically timed to be close in time to Go Live due to experiences in other settings demonstrating that early training is important but will not be fully retained if offered several months before Go Live. In spite of these two rounds of pre-Go Live training it has been evidence since Go Live that staff need additional training, on an ongoing basis, as they are actually working with the new system.

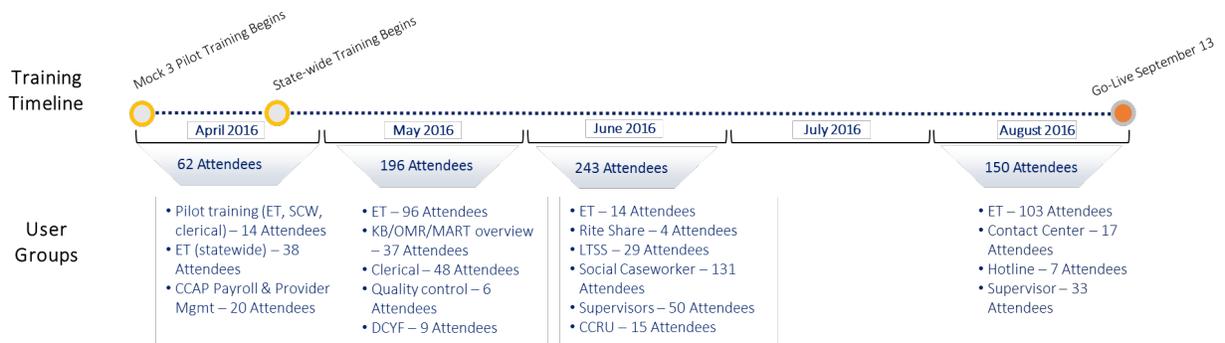
During the pre-Go Live training SNAP specific training for Quality Control included:

- Process overview
- Understanding the Dashboard
- Getting Help
- Generating SNAP-Positive Sample
- Assigning QC cases for review
- Searching for a case assigned to a QC reviewer
- System messages
- System dates
- Schedule an appointment
- Accessing ECF
- Viewing correspondence

This SNAP specific training, along with general system use training, will be repeated on a continuous basis, using four training delivery methods: workshops, WebEx, live demonstrations and classroom training. Training is delivered to different audiences (clerical, ETs, Social Workers, providers, navigators) depending upon needs and using different delivery methods appropriate to the group and the content. Training needs are constantly reassessed as part of this post-Go Live supplemental training plan, based on input provided to Deloitte by the state as illustrated below.

State employees were trained during two rounds of training and several pilot sessions before RIBridges Go-Live

DHS, EOHHS, HSRI, and Deloitte conducted training for RI State Human Services employees before the RIBridges implementation. Refresher training was conducted in August and September 2016 to accommodate groups that had a gap between initial classroom training and Go-Live, and to cover system changes. In total, 661 employees participated in training (some in more than one session) between April and September 2016.



After Go-Live, Deloitte continued training on a site-by-site basis to help users execute their day-to-day job responsibilities in the system

Deloitte has provided on-site support since Go-Live to troubleshoot issues and provide over-the-shoulder training. The team has also delivered ad-hoc training across 10 sites for 557 employees and CCAP providers (some in more than one session).



There is an opportunity to close knowledge gaps for State employees and improve overall user effectiveness in RIBridges

Note: November training listed here is through November 11, 2016
 *The lower number of the attendee range was used to calculate total training attendees

The goal of this proposed training curriculum is to close the policy and system knowledge gaps for DHS and HHS users over the next three months

Proposed Week-by-Week Schedule			
Potential Week	Training Topics	Potential Week	Training Topics
Nov. 14	• EOHHS Appeals Process	Dec. 26	<i>Holiday – No scheduled training</i>
Nov. 21	<i>Holiday – No scheduled training</i>	Jan. 2	<i>Holiday – No scheduled training</i>
Nov. 28	<ul style="list-style-type: none"> Scanning, Indexing and Re-indexing (EDM-RI) and Registering an Application Search function Redeterminations & Interims Associating a Case 	Jan. 9	<ul style="list-style-type: none"> Directing Lobby Traffic Special Medicaid Supervisor/Leadership Development Call Center Functionality
Dec. 5	<ul style="list-style-type: none"> Case Lifecycle/Statuses Troubleshooting (Eligibility screen) SNAP/RIW CCAP Open Enrollment Health/Medical Programs 	Jan. 16	<ul style="list-style-type: none"> Eligibility Override for MA and CCAP Interfaces Customer Portal
Dec. 12	<ul style="list-style-type: none"> GPA Programs SSP DCYF CCAP Workflow CCAP Issuance (payment history) 	Jan. 23	<ul style="list-style-type: none"> Worker Inbox Closing People in MAGI Cases
Dec. 19	<ul style="list-style-type: none"> Hardships and Sanctions (ET to SCW Handoffs) Building a Household Overpayments and Supplements 	Bold denotes a topic requiring State guidance on policy and/or business process as part of training	

The state has designed this plan to address the training gaps identified by FNS

FNS Training Observations	Training Topics
Workers should be trained to:	
Navigate the system	<ul style="list-style-type: none"> Case Lifecycle/Statuses <i>Program based courses (SNAP, RIW, GPA, Medical, etc.)</i> <i>Associating a case</i>
Validate case conversions	<ul style="list-style-type: none"> Case Lifecycle/Statuses <i>Program based courses (SNAP, RIW, GPA, Medical, etc.)</i>
Identify and resolve duplicate benefit issuances	<ul style="list-style-type: none"> Overpayments and Supplements Supervisor/Leadership Development
Properly use case narratives	<ul style="list-style-type: none"> Associating a Case

Training materials and content will be tailored to address the unique needs of the user groups below. Supervisors across the state will be trained on all the topics designed for their staff. Additional details on the implementation of this training curriculum are presented in the subsequent slides



* Will also include tailored material for KB/OMR/MART, Rite Share, and CCRU where appropriate ** Includes Hotline

Training will continue at least through January, using all four training methods, and with a variety of target audiences until the state leadership is satisfied that training needs no longer exist for the current workforce at which point training will be offered for new employees.

Section 3: Improve business processes including:

- **triage and prioritization of both expedited and non-expedited SNAP cases**
- **elimination of case backlogs**
- **restoration of benefits where appropriate**

In recognition of the high volume of cases that built up in a backlog during the first weeks after Go Live significant business process changes have been put in place to ensure the timely processing of expedited and non-expedited SNAP cases. This includes eliminating the backlog of any expedited SNAP cases pending more than 7 days and any non-expedited SNAP cases pending for more than 30 days.

Resolving the backlog of SNAP cases processed outside the 7 or 30 day regulatory timeframe has involved the follow steps:

Summary of non-lobby operating changes

1. Register the “backlog” of scanned and indexed applications
 - As of 11/21, all October applications, SNAP or otherwise, have been registered
2. Scan-Index-Register all incoming drop-off, mail-in and fax in applications within 2 business days of receipt
 - Dedicated FTEs to registration.
 - Train dedicated staff to work without paper lists being provided by Deloitte and register more accurately to properly capture expedited status of SNAP applications.
 - Track performance measure of Scanned-Indexed-Registered within 2 days of receipt to allow for real time adjustment of priorities and adherence to plan and opportunities for training.
3. Assign non-lobby work based on management prioritization, set productivity targets and track progress
 - Develop management view of prioritized work based on regulatory guidelines
 - Analyze workload based on management priorities to determine proper ET staffing levels
 - E.g. SNAP Expedited team to handle non-lobby SNAP expedited cases from intake through eligibility determination (one-and-done)
 - Improve short-term ability to distribute daily workload to supervisors via daily data queries and track productivity targets
 - Implement worker inbox as long-term solution to assign daily work to ETs to automatically assign ET workload based on priorities and team
4. Constitute specialized recerts, interims and changes team
 - Analyze workload to determine proper staffing levels
 - Confirm supporting business processes to achieve “one and done” processing
 - Track activity and certify that terminations are taking place as required, and that changes are made in a timely manner

1

Task List: Developing Ongoing Operation Model for Registration and Non-Lobby Work

Work	Action	Status
Registration of Applications	Clear October registration backlog	Complete – all applications received in October have been registered in to RI Bridges
	Develop registration-focused team to keep up with incoming applications	Complete – Designate specific FTEs to register applications that should be able to register 100 applications per day to keep up with SNAP applications received; register all received applications within 2 business days
	Improve registration training to increase processing time	In progress - Set goal of registering one application every 15 minutes
	Institute productivity targets	In progress -Utilize productivity targets to ensure progress and identify where additional training is required.
Non-Lobby Applications	Clearly designate FTEs in to teams to work on specific applications based on application priority	Completed – Designate FTEs to focus solely on eligibility determinations in SNAP cases (regular and expedited)
	Refine mechanism by which eligibility technicians are assigned daily work	In-Progress – DHS management working with contractor to re-vamp excel based sheets; Contractor developing re-vamped “worker inbox” for roll-out end of January to automate
	Institute productivity targets and track progress	In-Progress – ETs focused on SNAP applications should be making eligibility determinations on 6 applications per worker per day.
	Designate clear workspace for non-lobby FTEs	Planning – Co-locate non-lobby FTEs to maximize efficiency

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Non-Lobby Stable Operating Model and Daily Targets

Work to Be Performed	Target Applications Worked Per Business Day	Average Applications to Process Per Day	Total Days to Complete Per Day Work
Registration	100	183	1.8
SNAP Expedited Non-Lobby Work	24	10	0.4
SNAP Regular Non-Lobby Work	18	20	1.1
Recerts	80	3130 (Per Month)	30

3

The process for ensuring quick (less than 2 day) registration of all scanned applications and thus guaranteeing the timely ability to automatically sort all SNAP cases to identify those eligible for expedited handling has already been put in place. Per the grid above it is based on an average of 183 applications coming in each day and an average of 100 being registered each day thus

every incoming application will be registered within two days. The realigning of non-lobby staffing assignments to ensure timely handling of expedited and non-expedited SNAP as well as recertifications, interims and changes is in process. The ownership and timeline for steps in that process are as follows:

Task	Owner	Completion date
Determine remaining backlog	Ben Shaffer	Complete
Determine number of staff for assignment to backlog team	Tom Guthlein Shannon Massaroco	November 28 th
Re-train team on proper registration practices to accurately capture expedited SNAP	Zulma Garcia	December 1 st
Review and implement business processes for ensuring that scanning/indexing and registration all take place within 2 days	Tom Guthlein Shannon Massaroco	December 1 st

In addition to the process under way to resolve any remaining case handling backlog, a retrospective data analysis of all applications received since Go Live is being conducted to identify any SNAP recipients who have not received SNAP benefits consistent with their earliest date of application. Some SNAP recipients had to apply more than once in the weeks after Go Live and may have received benefits only for the later of more than one application. Earliest application dates are being researched now that all applications have been registered in order that benefits can be restored back to the earliest date of eligibility. This benefit restoration research will be concluded by November 30th and restoration of benefits for any affected customers will be accomplished during December.

Section 4: Reduce Office Overcrowding and Wait Times

Most DHS offices have experienced significant reductions in wait times since October as reflected in the weekly data submissions and the attached data appendix. However, the Providence office continues to experience long lines and unacceptable wait times.¹ A plan has been implemented to restructure the Providence lobby to resolve this issue. This plan, first implemented the week of November 7th, includes the following elements:

- Restructured the main lobby with SNAP-specific triage and expedited handling windows;
- Opened a second lobby for those who wish to check the status of their application or wait indoors to be seen in the main lobby;
- Reallocated staff to the front lobby to provide faster service in the lobby area;

¹ Additional lobby improvements are also planned for Woonsocket and Pawtucket consistent with successful strategies deployed in Providence

- Provide customers with a service number at the point of entry to the lobby so that they can be seated and wait for their number to be called (and displayed on the video monitors after December);
- Use 3 greeters including bilingual staff to work the line and triage customers even before they enter the lobby, including redirecting those who need a status check to the secondary lobby dedicated to that purpose.

Providence Lobby Approach



- Deploy Business Processes and Lobby Direction to limit lobby wait times
- Establish eligibility for benefits, triage customer needs, utilize appointments
- Emphasize Collection/Scanning drop-off information
- Secondary lobby address application status questions
- Inform customers of call center and provide opportunities to access services without entering lobby



- Utilize monitors to communicate with customers in the lobby
- Display lobby ticket number being served electronically
- Process applications in a timely and effective manner

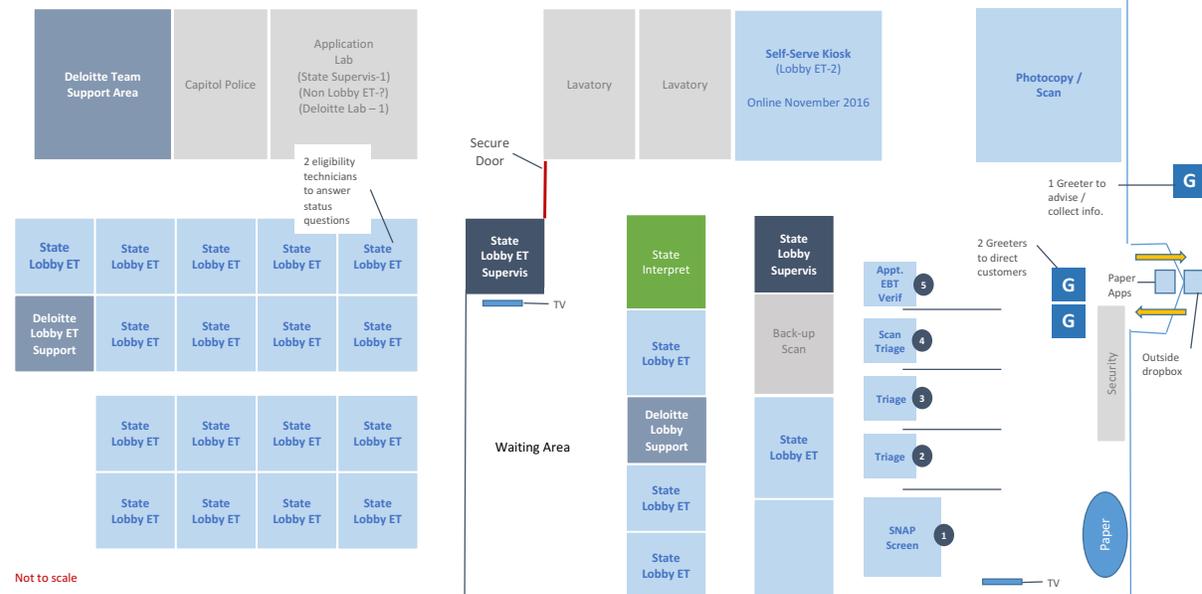


- Ensure staff number and proper organization, distribution and location to support lobby customers and process other work (non-lobby)
- Offer active, needed support to lobby staff

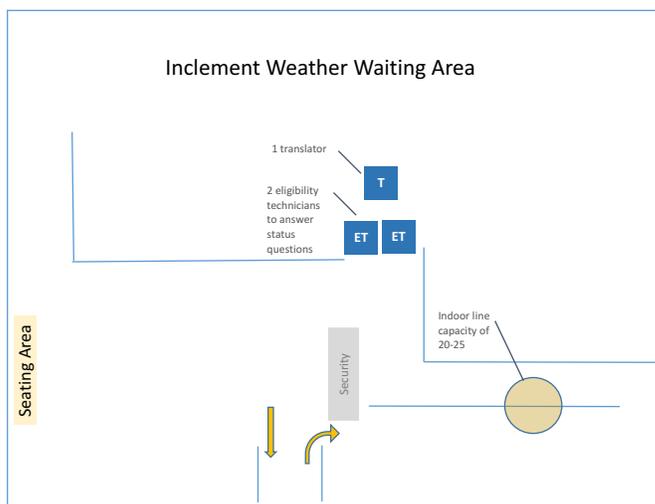
Main Lobby Plan

-  Establish 3 full-time greeter positions immediately after security station in lobby and one outside. Greeter will:
 - Apply decision-tree regarding how best to serve and direct customer
 - Advise customer of options
 - Print lobby ticket (for qualify entrants to lobby)
-  Utilize reception area, staffed with social workers and ETs in dedicated (but changeable) lines to:
 - Screen SNAP applicants (expedited and non-expedited; create appointment)
 - Triage cases where: benefits lost, benefits lost within 48 hours, domestic violence, EBT/FIS issue
 - Scan documentation brought in for an appointment
 - Schedule Appointments, Verification Letters
-  Move lobby staff closer to reception area and embed supervisor for support
-  Replace and relocate document dropbox to outside front of building
-  Enable easier access to paper applications in the near-term
-  Embed site support among lobby ET staff and actively support getting staff “unstuck”
-  Improve speed and flow of back office to support processing applications

Providence Facility – Main Lobby Floor Plan



Providence Facility -- Second “Status Check” Lobby and Inclement Weather Waiting Area



Customer queues are estimated to be comprised of 35-40% of persons seeking information regarding application status. To address concerns about overcrowding in main lobby and excessive wait times, a second lobby space is now open. In this space:

- 2 eligibility technicians (ETs) provide application status detail and answer basic customer case questions. Ets can:
 - Apply decision-tree regarding how best to serve and direct customer
 - Advise customer of options
 - Print lobby ticket (for qualify entrants to lobby) and direction
- 1 translator to provide translation services (rather than telephone assist)
- Small seating area for persons requiring assistance and larger seating area for persons waiting to be served in the main lobby – particularly in inclement weather

Section 5: Address Call Center Outages and Improve Call Center Business Process

DHS experienced higher than normal call volume during the first week of October due to co-occurrence of a State Supplement to SSI (SSP) check issuance complications and the high volume of calls that inevitably accompanies the first week of the month. During the same period DHS made a telecommunication change to improve customer service, routing calls from the DHS field offices to the main Call Center for better handling. Telecom ports were taken up by this call transfer from the field offices. Increased call volumes, compounded by the limited available telecom ports, resulted in intermittent Call Center service outages for customers during October. DHS is working to implement a Corrective Action Plan to remedy the issue. With the help of the Department of Information Technology, a message directing callers to the DHS main Call Center, at 1-855-MY-RIDHS, now plays when calls are made to field offices. This action frees ports that would otherwise be engaged by call transfer thus preventing outages.

Since the September launch, DHS has partnered with HealthSource RI (HSRI), RI's state based insurance marketplace, to leverage and implement call center improvement strategies and best practices HSRI has developed over the last three years of operations. To date this interagency team has reviewed and assessed the call center's existing technology, infrastructure, management structure, training processes and general operations. In addition, the team has established a dedicated second tier unit (Tier Two) for escalated and complicated cases that cannot be resolved expeditiously by the front-line call center representatives. Based on this assessment we have identified call center improvement strategies to be implemented over the course of the next month all in the interest of answering a higher percentage of inbound calls, a lower average wait time and a higher quality of customer experience. These strategies are listed below with target completion dates:

Improvement	Timeline
Enhance the process for calling customers who request a callback by identifying dedicated resources to ensure calls are returned in a timely manner	November 28
Set up a "human triage unit" to quickly segment customer into the appropriate call queue based on the nature of the call (SNAP, Medical, RIW etc.)	December 9
Leverage unused telecom capabilities in the existing solution as well as the use of HSRI's customer relationship management (CRM) for use by all front line and Tier Two staff	December 19
Evaluate existing call center structure, identify gaps and execute changes to improve staff productivity:	Ongoing
Assess reasons why customers are calling, ways to facilitate quicker resolution of calls, or prevent incoming calls	Ongoing
Improve operations by co-locating staff in one dedicated area of the	December 19

Providence DHS field office	
Leverage and organize existing DHS and Deloitte training support to initiate quick hit, on the phone training and develop longer term, continuous improvement training plan	December 19

These activities are already showing some positive results. During the week of November 19 1,602 customers accessed the Call Back feature; 4,521 customers utilized the automated prompt response to get information; the average wait time dropped to 34 minutes from over an hour; and the average time to handle a call was between 7 and 8 minutes.

These Call Center results compare favorably to the metrics reported in the weekly reports previously submitted. The metrics collected in the Data Appendix for this Corrective Action Plan and submitted on an ongoing weekly basis will enable the continued monitoring of these improvements.

Section 6: Provide accurate and timely notices

A notices Quality Control team meets regularly to review all notices being generated by the new RIB ridges system. Prior to releasing notices their content and legal validity is reviewed by a team comprised of legal, technical and program subject matter experts. Once the form of the notice is signed off on by this multidisciplinary team, the size of the group to be notified is assessed for validity by reference to historical experience for the number of notices generated in the same category in the past.

Notice review and improvement are ongoing processes which will continue through at least the first 12 months of the implementation of RIB ridges. Improvements will be continuously made to notices based on Quality Control review and input from community experts. While this continuous improvement process is ongoing notices are being generated and interim business processes for manual notice generation are being employed in limited instances noted in the grid below.

#	Agency	Notices	Total Generated To Date	Mailed Out On time	Held Now?	Current Status/ Comments
1	DHS	DHS1605 - Benefits Decision Notice	50085	Yes	No	
2	DHS	DHS0038 - Verification of Employment Notice	31	Yes	No	
3	DHS	DHS0254 - Notice of Missed Interview	659	Yes	No	
4	DHS	DHS1046 - Six-Month Interim Report	12381	No	No	As per QC review process, State held the notices for review and sent them to the customers after a week
5	DHS	DHS2240-A - Mid-Certification Contact Notice	3617	Yes	No	
6	DHS	DHS3688 - Shelter Verification Notice	11	No	Yes	QC is in progress. Targeting end of November to release these notices

7	DHS	DHS4358-A - Notice of Over Issuance	2	No	Yes	QC is in progress. Targeting end of November to release these notices
8	DHS	DHS0601 - Food Replacement Affidavit Notice	1	No	Yes	State is currently generating these notices manually
9	DHS	DHS2240 - Change Report	10	No	Yes	QC is in progress. Targeting end of November to release these notices
10	DHS	DHS0330 - Unsigned Application Notice	3	No	Yes	On hold; State is currently generating these notices manually
11	DHS / EOHHS	DHS 1010 - Renewal Notice	6662	No	Yes	November 22, 2016
12	DHS	DHS0170 - Appointment Notice	1182	Yes	No	
13	DHS / EOHHS / HSRI	DHS100 - Quick Note	482	Yes	No	
14	DHS	SNAP230P - SNAP Application Delay Notice	7	Yes	No	
15	DHS / EOHHS / HSRI	Voter Registration Form	417	Yes	No	
16	DHS / EOHHS / HSRI	DHS-0100-M Mass Mailing	14432	Yes	No	
17	DHS	DHS-MASS-Notice of Approval for Manual SNAP Benefits Replacements	14	Yes	No	
18	DHS	DHS-MASS-Notice of Denial for Manual SNAP Benefit Replacements	2	Yes	No	
19	DHS / EOHHS / HSRI	DHS3503-Additional Documentation Required	12942	Yes	No	
20	DHS / EOHHS / HSRI	DHS3503-D Date of Birth Verification	115	Yes	No	
21	EOHHS / DHS / HSRI	COR-ELG-20 Removal of Head of Household/Primary Applicant Notice	115	Yes	No	
22	DHS	DHS0308 - School Lunch-Direct Certification Letter	5773	Yes	No	
23	DHS	DHS0309 - Traditional School Lunch Letter	24301	Yes	No	
24	DHS	DHS0328 - Notice for Heat and Eat Program	1952	Yes	No	
25	DHS	DHS3782 - Out of State Inquiry Notice	1	No	Yes	State is currently generating these notices manually
26	DHS	DHS3569 - Seasonal Migrant Income Verification Notice	1	No	Yes	State is currently generating these notices manually

Section 7: Ensure access to interpreters and translated materials

Translated materials are now available in the RI DHS offices. In addition, the Department of Human Services employs a total of seven interpreters statewide. The department also contracts with a local interpreting service agency and the Big Word (a telephone interpreter service) to provide additional support to customers in the field offices. The department also employs bi-lingual Eligibility Technicians and clerks. Below is a breakdown of interpreter staff by office.

Office	State FTE	Contracted FTE
Pawtucket	2	1
Providence	4	3
Woonsocket	1	0
Middletown, Warwick, Wakefield	Big Word (multi-lingual telephone interpreter service)	

Overall Goal: Increase interpreter visibility & availability in field offices by:

1. Adding interpreters to specific areas or offices (i.e. lobbies, call center, etc.);
2. Monitoring the need for interpreters in all field offices;
3. Adding additional staff as needed in all field offices.

Action Steps

Action Steps: Providence Office

- Add one Spanish language interpreter in the waiting area to announce lobby numbers.
- Assign two -bilingual staff at the greeter station to ensure that customers move through the line more quickly and smoothly.
- When two bilingual staff are not available to serve at the greeter station we add one Spanish language interpreter to the greeter station.
- Add a Spanish language interpreter to the second “check status” lobby.

Action Steps: Pawtucket Office

- Maintain one Portuguese interpreter based on volume of customers served.
- Continue to maintain the three Spanish language interpreters in the front area of the lobby to readily assist customers.

Action Steps: Woonsocket Office

- Move the interpreter to the front of the office where s/he can be visible and available to the customers and staff.
- Assign bilingual staff at the reception desk.

All interpreter and bilingual staff changes are in effect/will be in effect as of November 25th except for the Woonsocket office in which the changes will be implemented during December.

Section 8: Ensure Quality Control Process and Program Measures

DHS is working to ensure SNAP Program Integrity and Quality Control procedures as required by law and regulations in two phases.

Specifically:

- Ensure that correct Quality Control samples can be pulled from the system;
- Ensure all critical matches including wages matches are being conducted.

The Rhode Island Department of Human Services (DHS) is fully committed to administering the Supplemental Nutrition Assistance Program (SNAP) in a way that safeguards program integrity while ensuring eligible customers have access to timely and accurate benefits and assistance.

SNAP QC staff worked collaboratively with Deloitte to draft the required QC Sampling Plan for FFY2017 and have been in regular communication with FNS regarding the QC Sample pulls. The September sample is a combination of two samples – one pulled from each eligibility system. The September sample from RIB ridges has been successfully pulled but requires some further analysis to ensure that the FFY2016 sampling plan is being accurately followed.

QC staff is also actively working with the legacy system administrators to have an accurate sample pulled from the limited September universe stored in In Rhodes. The entire September QC sample pull is on target to be ready for review by the end of November.

The October QC sample was successfully pulled from RIB ridges on November 1 and was analyzed for accuracy and compliance with the sampling plan. One issue has been identified for which a system fix is scheduled to be implemented during the weekend of November 19-20. The November QC sample is on target to be pulled on December 1.

The Electronic Disqualified Recipient System (eDRS) is prepared to go into production for inclusion in RIB ridges and is scheduled to be in service by December 31. Because the eDRS is switching to a GEN4 web services functionality implementation was held to ensure that this is the version that will be available through RIB ridges. This new version will allow for real time checks of new applications. This version of the system was not available under our legacy eligibility system.

While the new eDRS is being prepared for implementation, a manual process has been put into place to ensure the integrity of SNAP. The interim process includes Deloitte providing an extract of all newly filed SNAP applications and recertifications to the R.I. Bureau of Audits, who in turn manually check the cases against eDRS. The Bureau of Audits takes action against any case that is found to be engaged in program violations through this interim business process. The RI Bureau of Audits has already checked over 7,000 cases received since Go Live against the eDRS and has not found any confirmed eDRS non-compliance as part of that review.

The National Directory of New Hires (NDNH) interface is scheduled to be implemented in RIB ridges by January 27, 2017. SNAP staff is actively engaged with Deloitte in constructing the

	Title	Description	Impacted Programs	Target Implementation	Status
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necessary functionality and drafting the appropriate reporting criteria to satisfy the Office of Management and Budget data reporting requirements. The interim process while the new NDNH functionality is being developed, includes the use of the state-level Department of Labor and Training wage database to cross check wage information.

The Public Assistance Reporting Information System (PARIS) is on track to be an implemented interface of the new system by January, 2017. Rhode Island has participated in PARIS on a quarterly basis in the past and will continue with the same level of participation in the New Year with capability to implement in the first quarter.

Section 9: Deferred Functionality Timeline

In order to stabilize the system and implement the pre-launch code freeze careful decisions were made to defer certain functionality being activated in the new system until after Go Live. The table below reflects all of the implementation timelines for deferred functionality through June, 2017. In each case of deferred functionality an interim business process was developed and implemented to ensure that program requirements are met during the period between Go Live and the inclusion of the functionality in the new system.

				Month	
1	Display benefit calculation details	Benefit calculation details were removed from the eligibility notices initially to improve readability. In subsequent sessions with the advocacy group it was decided to include more details around benefit calculations for Health coverage, SNAP, RIW and CCAP programs.	All Programs	October	Completed
2	Spanish/Portuguese notice translations for key notices	Implement functionality to generate and send priority notices in Spanish and Portuguese from RI Bridges. Two additional translation releases are scheduled for January and May.	All Programs	October, January, and May	In Progress
3	Trading Partners (Part 1), such as: <ul style="list-style-type: none"> FNS electronic disqualifications (eDRS) CMS Medicare buy-in SSA online query and prisoner match DLT interfaces (i.e. Work Opportunity tax credit) 	Add interfaces with additional trading partners	SNAP Medicaid All RIWorks	January, 2017	In Progress
4	Passive renewals for Medicaid	Implement Medicaid passive renewal functionality into RI Bridges.	Medical	January, 2017	In Progress
5	90-day QHP Verification Batch	The 90-day QHP verification batch analyzes outstanding verifications for QHP recipients and takes the necessary action	Exchange	January, 2017	In Progress
6	Disaster SNAP - Part 2 (QC and program denial)	Integrate DSNAP program denial and QC functionality into RIB ridges	SNAP	January, 2017	In Progress
7	Medicaid 1095B Implementation	Integrate Medicaid 1095-B forms and associated admin functionality into RI Bridges	Medicaid	January, 2017	In Progress
8	Trading Partners (Part 2), such as: <ul style="list-style-type: none"> Dept. of Transportation address match Stellarware new hire match National Directory 	Add interfaces with new trading partners	All programs	May, 2017	In Progress

	<ul style="list-style-type: none"> • for new hires • Race to the Top program • Treasury Offset Program • Federal Immigration Verification (USCIS) 				
9	New correspondences	<ul style="list-style-type: none"> - Bill for School Hours - Age Exemption Request Form - Change to School Age Eligibility - Earned Income Tax Credit - Month Counted against time limit - No Pay Notice - Month Counted against time limit - Out of State Notice - School Lunch Direct Certification Letter - Traditional School Lunch Letter - Bike Helmet 	Child Care	May, 2017	In Progress
10	Child care union dues	DHS recently signed a new agreement with the CCAP Provider Union. As a result, there are new system requirements including changes in issuance to allow for union fees, political action group contributions, direct deposit incentives, etc	Child Care	May, 2017	In Progress
11	Kiosks for local office lobby	Implement Kiosks for check-in/check-out with ticket printing and other functionality	All Programs	May, 2017	In Progress
12	FRED/Fraud (fraud investigation tracking)	Integrate end-to-end FRED/Fraud functionality into RI Bridges	All Programs	May, 2017	In Progress
13	APTC override functionality	Enhance APTC override functionality in RI Bridges	HSRI	May, 2017	In Progress

Conclusion:

Rhode Island continues to value FNS' close coordination and support as we work through the many issues and concerns that inevitably arise in the implementation of a completely new Integrated Eligibility and Enrollment system for all health and human services programs. We invite and expect feedback and input based upon this Corrective Action Plan and welcome the ongoing assistance, guidance and partnership of USDA/FNS. Rhode Island expects that the implementation of this Corrective Action Plan will be a cooperative effort with open communication between Rhode Island the FNS as well as ongoing weekly reporting from Rhode Island on the goals and commitments in this Corrective Action Plan. Rhode Island remain confident that the technology, process and infrastructure improvements already in place, along with those scheduled and in process, will enable Rhode Island to operate a fully compliant SNAP program and best serve the needs of Rhode Islanders who rely upon SNAP to enhance their food security.