



Rhode Island Department of Human Services
57 Howard Avenue Louis Pasteur Building Cranston, RI 02920

October 5, 2017

Bonnie Brathwaite, Director
U.S. Department of Agriculture
Supplemental Nutrition Assistance Program
Northeast Region
10 Causeway Street
Boston, MA 02222

Dear Ms. Brathwaite:

Please accept this document as the FFY2018 Management Evaluation Review Plan for the State of Rhode Island Department of Human Services (RI DHS).

FY18 Target Areas:

1. Able-Bodied Adults Without Dependents (ABAWD) tracking and policy compliance for States transitioning-off of Statewide time limit waivers in FY 2018;

The state has one community that does not have an ABAWD Waiver: Richmond RI. This community is served primarily by the South County Regional Office. This topic will be included during that office's review in FFY2018.

2. State Employment and Training (E&T) programs that have added new third-party partners since FY 2017

This review will be addressed in the State At-Risk Area.

3. States with counties that have shifted to mandatory E&T programs since FY 2017 or plan to shift in FY 2018

RI does not have a county shifting to a mandatory E&T program.

4. Program Access Review (PAR)

There are six project areas (field offices) in Rhode Island. Providence is considered a large project area and is required to be reviewed annually, Pawtucket, South County, Warwick and Woonsocket are medium project areas and are required to be reviewed every two years. Newport is a small project area and is required to be reviewed every three years. The ongoing three-year review cycle for the project areas will be as follows:

FY2018 Providence, Pawtucket, South County and Warwick
FY2019 Providence and Woonsocket
FY2020 Providence, Pawtucket, South County, Warwick and Newport

The schedule for the four project areas reviewed in FFY18 will be as follows:

March 2018 – South County DHS. We will review a sample from January 2018.
May 2018 – Pawtucket DHS. We will review a sample from March 2018.
July 2018 – Providence Regional Center. We will review a sample from May 2018.
August 2018 – Warwick DHS. We will review a sample from June 2018.

The Program Access review will be conducted using the methodology contained in the FNS Supplemental Nutrition Assistance Program: Conducting Program Access Reviews at Local Offices – A Guide for FNS Regional Offices, April 2011 and the Program Access Review Guide Tools provided by FNS as well as the Program Access Review (PAR) FY 2017 Supplemental Guide, October 2016. This guide and guide tools for FNS Regional Offices have been adapted for use by State-level ME Reviews. The Management Evaluation Reviewer will collect participation data and local office information prior to the review. A sample of initial applications, denied applications, terminations and recertification will be selected for electronic case file reviews.

We have requested that a random sample of cases to be reviewed be generated by our system contractor, Deloitte. We request that the process for obtaining that sample, as described in FNS' aforementioned supplement, "Random Sampling Guidance" pages 12-14 be used.

The electronic case files chosen for review will be examined to ensure that all of the verification requirements and electronic case file documentation is contained in the record. Reviewer will also check all notices, including the notice of missed interview (NOMI), notice of expiration (NOE) and recertification appointment notices to determine if they have been sent in a timely manner.

Reviewer will determine if the State agency is meeting timeliness standards for applications and recertifications. As requested in the target letter, *an emphasis will be placed on the recertification process*. Office procedures will be examined to ensure that applicants are receiving their benefits in a timely manner and that no barriers exist to file a SNAP application or Recertification. Expedited SNAP applications will be reviewed to ensure that eligible recipients are being screened accurately and receive their benefits within seven days of filing an application. All other non-expedited SNAP cases will be examined to determine if they have been processed within the thirty-day time frame.

Staff will be interviewed regarding their knowledge of SNAP policy and procedures. Clients and advocates will also be interviewed. Participants will be asked to rate the level of customer service they receive when interacting with the State Agency. The reviewer will observe local office operations including the availability of SNAP applications, and the availability of bilingual staff, services and materials.

The review begins with an Entrance Interview which informs the local office of the agenda and the scope of the review. The in-office review last approximately three days. At the conclusion, an Exit Conference is scheduled to discuss any findings or issues that were discovered. At this meeting, cases are reviewed and possible corrective actions are discussed.

Within thirty days of the review, any Findings or Observations will be addressed in a letter to the Office Administrator of the reviewed office. Copies will also be sent to the DHS Director, Associate Directors, SNAP Administrator, SNAP Assistant Administrator and the Corrective Action Officer. The Office Administrator will have thirty days to respond to the findings with a corrective action plan. This plan should consist of corrective actions and timelines of when they will be or have been implemented. The ME Reviewer will monitor any pending corrective actions and verify when they are completed.

5. Electronic Benefit Transfer (EBT) when the State implements a new photo EBT card policy.

This policy does not apply to RI, as RI is not implementing photo EBT cards.

State At-Risk Areas:

1. PAR at the State agency level:

Any outstanding corrective actions from the State PAR completed by FNS will be reviewed.

In addition, the State will review areas that may have been impacted by the roll out of the new Integrated Eligibility System (IES), RI Bridges. Those areas are: Call Center; Online Customer Portal; Timeliness; Applications and Internet resources; Client notices including content and timeliness; Client Complaints and access to the Department to include phone, mail, and in person access.

2. ABAWDS:

As of September 1, 2017, RI will no longer be covered by a statewide ABAWD waiver. The town of Richmond, RI, will no longer be covered by the geographic ABAWD waiver. Since this takes effect in the final month of FFY 17, ABAWDS will be reviewed in the South County office, which serves Richmond, during the FFY18 scheduled review of that office.

3. Case and Procedure Error Rate (CAPER):

Reviewer will work with Quality Control and the State SNAP Corrective Action Officer to obtain information on error causes and the analysis of case and procedural error rates. Reviewer will also analyze and work on corrective action for any CAPER related errors during the Program Access electronic case file reviews.

4. EBT Administrative Terminal System Security:

Reviewer will examine the State's compliance with the regulations regarding Terminal System Security, benefit issuance, separation of duties as it relates to issuance, and card and Personal Identification Number (PIN) security. On an annual basis, reviewer will conduct an EBT security audit for offices and examine the EBT Coordinator's monitoring of the security access to FIS.

5. E&T Programs that leverage third party funds, or operate in pledge States, or make significant changes in providers or funding categories:

Rhode Island's SNAP Employment and Training program is voluntary. The SNAP Employment and Training Program Review Guide will be utilized during site visits. Reviewer will also verify if the contractor is regularly confirming SNAP eligibility of E&T participants. The reviewer will contact the Employment and Training vendor the month prior to the review to arrange the specific dates and sites. The reviewer will then send the details to FNS. The Reviewer will also join the state's SNAP E&T vendor in at least two compliance reviews of sub-contractors, those that provide the programming. The reviewer will also contact a financial audit of contractor invoices.

6. SNAP-Ed:

On-site nutrition education reviews of local operations in at least two project sites will be conducted in June 2018 to ensure that operations comply with the requirements of the Nutrition Education plan. Reviewer will utilize the Educational Activity Observation Tool provided by FNS. The reviewer will contact the SNAP-Ed vendor the month prior to the review to arrange the specific dates and sites.

In addition to the on-site reviews, the State will conduct a financial audit of the invoices submitted by the contractor to ensure that the services provided are billed for accurately. Staff from the financial management office will be solicited to assist for their subject matter expertise. The reviewer will then send the details to FNS.

7. Recipient Claims Management & Treasury Offset Program;

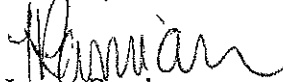
Reviewer will examine claims establishment procedures to make a determination as to how completely and timely discrepant data is being processed and if there is a backlog of cases to be processed. Case records will be reviewed for accuracy, adherence to policy, documentation supporting referrals and claim establishment. The ME reviewer will work with CCRU (Claims, Collections, and Recovery Unit) to evaluate the Treasury Offset process and any findings will be reported. The review will include examination of claims functionality in the new integrated eligibility system.

8. Recipient Integrity

A sampling of the State's electronic case files will be reviewed to ensure investigators are consistent and that regulations are being followed. Files will be examined to verify that all necessary documentation is present and electronic case files are complete. The eDRS disqualifications will be assessed to determine if they are being entered timely and correctly. The review will also examine procedures in place during time when eDRS interface was not functioning.

Review instruments (Attachment A) for the FY2018 review are attached. If you require further information, please contact William O'Donnell at (401) 462-1853.

Sincerely,



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SNAP Administrator

CC: Courtney Hawkins, Director, RI DHS
Kim Brito, Deputy Director, RI DHS
Maureen Donnelly, Associate Director for Operations, RI DHS
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