



**United States
Department of
Agriculture**

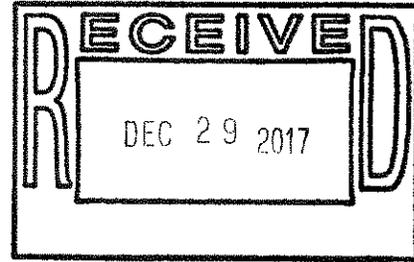
Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

DEC 26 2017

Courtney Hawkins, Director
RI Department of Human Services
Louis Pasteur Building
57 Howard Avenue
Cranston, RI 02920



Dear Director Hawkins:

Thank you for the Supplemental Nutrition Assistance Program (SNAP) semi-annual Corrective Action Plan (CAP) for November 2017, which the Food and Nutrition Service (FNS) received on November 2, 2017. FNS has the following comments regarding the recent State responses contained within this CAP:

Electronic Benefit Transfer (EBT)

Finding #3: Requests to replace an EBT Card

State Response: *A manual one-call process was initiated and will remain in place until DHS implements the proposed one-call process for replacement cards with our EBT Card Vendor, Xerox/FIS. The manual process one-call process helps to ensure that customers who report their cards lost, stolen or damaged by calling the FIS customer service representatives are issued a replacement card without having to make a second call to a RI DHS office. RI DHS requested FIS to update all training materials and the FIS customer service script regarding replacement requests. This update by FIS was in place by September 9, 2016 and RI DHS implemented the following manual process:*

- *The EBT Coordinator reviews the daily card status report (EBTDS 210-1) from EBT Edge and identifies card status changes initiated by FIS CSR.*
- *The EBT Coordinator reviews and reissues cards, if needed, within two business days.*
- *In the EBT Coordinator's absence, the SNAP Corrective Action Officer retrieves the report and reissues cards.*

A draft of the One Step EBT Replacement Card Procedure memorandum was attached to the original corrective action response. As discussed during the telephone meeting on August 30, 2016, RI DHS did provide the January 2016 EBTDS 302-1 report. Another copy of this report was attached to the corrective action response.

In October 2016, the customer service script and FIS training materials were updated. In addition, RI DHS began manually replacing EBT cards on the next business day after the card was cancelled.

RI DHS anticipates that during the calendar year 2018, FIS will assume the role of replacing the EBT card requests by the client.

FNS Response: FNS will address open findings pertaining to the Fiscal Year (FY) 2016 EBT Management Evaluation (ME) under separate cover in the FY 2017 EBT ME report.

Finding #8: Reconciliation and Reporting

State Response: *RI DHS is continuing to work with the vendor, Deloitte, to refine the data accuracy of the FNS-46 along with data for all FNS reports.*

RI DHS anticipates that the FNS-46 report issues will be resolved by December 2017 and the FPRS system will be updated for current, ongoing and retroactive FFY 2017 /2018 data.

FNS Response: FNS will address open findings pertaining to the FY 2016 EBT ME under separate cover in the FY 2017 EBT ME report.

Recipient Claims Management Evaluation Review

Finding #1: RI DHS has a significant claims backlog.

State Response: *(Unchanged) The State is working on the reduction of the claims backlog by having CCRU staff manually set up paper files/packets for the claims in the backlog while the CCRU system functionality is being tested in the new eligibility system. Since the previous CAP was submitted, approximately 500 backlogged claims have been prepped for entry into the new system.*

RI DHS is also addressing the staffing levels and issues in the unit so that it is staffed adequately to process the backlog in place before the new eligibility system and since the new system launched. In the summer of 2016, the supervisor for the CCRU was transferred with the Fraud unit to another state agency. The unit has had at least three different temporary supervisors in the last year. Additionally, since the beginning of 2017, CCRU has had 3 out of the 4 staff retire, and the fourth staff transfer into another state position. As such, we have hired, trained, and on boarded three new eligibility technician staff to the unit and two clerical support staff. We have budgeted and anticipate to hire an additional three eligibility technician staff by the end of January 2017. We also plan to hire a full-time supervisor for the unit by the end of the year.

RI DHS is continuing to work with the vendor, Deloitte, to develop and refine the claims, collections, and recoupment process in the new system.

State Response: *In the letter from FNS dated September 17, 2015 it states this finding will remain open until RI DHS provides final copies of the new notices with the new updates. During the June 2017 State of RI Combined Review, FNS was provided with templates and sample notices from RIBridges. Subsequently, FNS submitted a report based on the review. The State will be providing a response/CAP to that review, addressing any notice issues, separately.*

FNS Response: This finding will remain open. FNS will review the responses to this finding and others included in the response received December 15, 2017 from the State related to the FY 2017 combined review.

In addition to the above, FNS Quality Control (QC) provides the following direction with regard to the Timeliness of Completing QC Cases. FNS acknowledges submission of a CAP on July 26, 2017 and followed up with additional information in an email on November 8, 2017. The State's efforts to hire and train additional QC resources are a step in the right direction. Additionally, RI is reviewing existing QC procedures and has requested technical assistance from FNS. The FNS QC team will proceed to schedule a technical assistance call; however, it will be challenging for FNS to accomplish an on-site visit prior to the deadline for completing the FY 2017 QC cases due to workload considerations. Please be mindful that, according to regulations, RI is required to meet the February 2, 2018 deadline for completing and transmitting all FY 2017 QC cases.

Please provide the requested additional materials and information for findings above within 30 days of receipt of this letter. If you have any questions or concerns, please contact Maria Volpe by phone at 617-565-6390 or by email at Maria.Volpe@fns.usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Brathwaite", followed by the word "for" written in a smaller, cursive script.

Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Iwona Ramian