



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

November 1, 2017

Bonnie Brathwaite, Director
U.S. Department of Agriculture
Supplemental Nutrition Assistance Program
Northeast Region
10 Causeway Street, Room 501
Boston, MA 02222

Dear Ms. Brathwaite:

Please find below the Semi-Annual Corrective Action Plan (CAP) for the RI Department of Human Services (RI DHS) Supplemental Nutrition Assistance Program (SNAP).

We will submit an encompassing CAP related to the UHIP Integrated Eligibility System separately from this plan. This plan does not include items addressed in that CAP. Furthermore, this Semi-Annual CAP does not address any corrective actions that have been deemed closed by FNS.

Electronic Benefit Transfer (EBT) – Submitted on September 9, 2016

Finding #3: Requests to replace an EBT Card

In accordance with 7 CFR 274.6(b), households should have the ability to report their card lost or stolen 24 hours a day 7 days a week with a single call.

FNS Response to CAP: FNS has reviewed the State Agency's corrective action response to this finding and there is insufficient information, or documentation to determine if the "one call" has been established and card replacement timeframes are being met. DHS has not provided FNS with EBTDS 302-1 EBT card replacement reports for the month of January 2016, the updated FIS Customer Services scripts, and documentation describing the process of automating the card replacement process along with the implementation timeline. Within 10 days of receipt of this letter, DHS needs to provide FNS with internal written procedures established for the manual process.

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.

Finding #8: Reconciliation and Reporting

RI DHS needs to create and maintain written reconciliation and reporting procedures. DHS needs to ensure benefits are accurately and timely reported on the FNS-46 Report.

FNS Response to CAP: FNS has reviewed the State Agency's corrective action response to this finding and there is insufficient information, or documentation to demonstrate RI DHS has drafted the reconciliation and reporting procedures and implemented a manual method or system in place to accurately capture the SNAP issuance for FNS-46 reporting purposes.

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.

Recipient Claims Management Evaluation Review – Submitted on July 20, 2016

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

RI DHS has been working steadily to decrease their backlog. As of May 10, 2016, the claims backlog has been significantly reduced to 5,146. RI DHS continues to report the backlog figure to FNS on a monthly basis. This Finding will remain open until the backlog is resolved.

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.

Finding #3: Inaccurate Date of Discovery used.

The proposed corrective action is unacceptable as it does not accurately determine the true date of discovery. The date of discovery should be the date when there is sufficient information for the department to move forward towards a “potential” claim and not when there is enough information to calculate a claim. Obtaining the appropriate data to calculate could extend into weeks, especially if the information is provided through match requests or employers. FNS acknowledges that there may be few exceptions when the date of establishment and date of discovery are one and the same. However, measures should be in place that monitors timeframes at the time claim referrals are received, the potential of a claim exists to obtain sufficient information, to the date of establishment. FNS is available to provide technical assistance to RI DHS staff via conference call in crafting a more appropriate definition of Date of Discovery. This Finding will remain open pending the additional clarification from the State.

State Response: (Unchanged) The Discovery Date will be the date the field worker submits the potential claim with all required documentation to CCRU. The Establishment date will still be the date CCRU staff enters the claim into the system and sends the household a Demand Letter notifying the household of the claim. RI DHS is continuing to work with the vendor, Deloitte, to develop and refine the CCRU functionality in the new system. Currently, as directed by FNS, no new claims are being entered or established in the new system.

Treasury Offset Program (TOP)

Finding #5: Failure to properly determine delinquency date.

This Finding will remain open until FNS can confirm that RI DHS' new eligibility system RIBridges is able to properly determine the delinquency date.

State Response: The TOP functionality in the new system has been deferred post go-live. State is currently testing the functionality. The state has also asked to be voluntarily removed from TOP for at least the next year, or until such time as the functionality is fully tested and properly functioning, and all reconciliation has been completed on the claims currently in TOP as well as those in the state system.

State Level Program Access Review (PAR)

Finding #2: Client notices missing required language.

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.

If you have any questions or concerns, or require any further information or documentation, please feel free to contact me at 401-462-6410 or by e-mail at Iwona.Ramian@dhs.ri.gov.

Sincerely,



Iwona Ramian, Esq.
SNAP Administrator

cc: Courtney Hawkins, Director RI DHS
Kimberly Brito, Deputy Director, RI DHS
Maureen Donnelly, Associate Director, Operations, RI DHS
Kimberly Nikolaidis, Assistant SNAP Administrator, RI DHS
William O'Donnell, SNAP Corrective Action officer, RI DHS
Matthew Henschel, Team Lead, FNS, NERO
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