



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

December 14, 2018

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 the following amended RI Management Evaluation Plan for FY2019 in response to the FNS letter dated 11/5/18.

State of RI, Department of Human Services FFY 2019 ME Plan

This plan will address the State Target Areas as well as the State At-Risk Areas. The State Target Areas are:

1. Recipient Integrity Module 2: Data Matching and Card Replacement;
2. Able-Bodied Adults Without Dependents (ABAWD) tracking and policy compliance for counties/project areas transitioning-off of Statewide time limit waivers in FY 2019;
3. Employment and Training (E&T) Program Review - in States that operate a mandatory E&T program; and
4. SNAP-Ed.

The State At-Risk Areas are:

1. ABAWDs;
2. E&T in counties/project areas that have budgets in excess of \$5 million or in States that receive ABAWD pledge funds;
3. EBT Administrative Terminal System Security;
4. Recipient Claims Management/Treasury Offset Program; and
5. Recipient Integrity.

The State will not review State At-Risk number 2 above. The State does not receive ABAWD Pledge funds nor is the E&T budget in excess of \$5 million.

The State will also not review State Target Area number 3 above. That State does not operate an mandatory E&T program.

There are six project areas 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:

FY2019 Providence and Woonsocket  
FY2020 Providence, Pawtucket, South County, Warwick and Newport  
FY2021 Providence and Woonsocket

The schedule for the two project areas reviewed in FY19 will be as follows:

March 2019 – Providence Regional Center review a sample from January 2019

May 2019 – Woonsocket DHS review a sample from March 2019

The required 2019 review topics are all state wide in nature. In order to conduct the reviews and meet the annual office review requirement, the State will incorporate the 2019 offices, Providence and Woonsocket into the statewide reviews when the applicable section pertains to an office level task.

### **Recipient Integrity Module 2: Data Matching and Card Replacement:**

**Goal:** The goal of this review is to determine how waste, fraud, and abuse are handled in RI Department of Human Services (RI DHS). RI DHS ME Reviewer will examine the following areas: organizational structure and work flow: fraud referrals: fraud detections: investigations: computer matches: The Administration Disqualification Hearing (ADH) process: prosecutions: The Electronic Disqualified Recipient System (eDRS): and the process for collecting data for FNS reports

**Measure:** The Department is: Conducting required matches; creating tasks and clearing the tasks for each of the interfaces; Potential IPV/ fraud cases are referred to the Fraud Unit; Those cases are investigated and as appropriate, referred to the hearing office and /or for prosecution; The hearing process is timely; The cases are acted upon correctly and timely and; the data entered eDRS; The data is collected for the applicable FNS reports; Those reports are submitted timely.

**Methodology:** Using the methods and tools from the FNS Recipient Integrity Guide, the ME reviewer will sample 45 cases: 15 from Prisoner interface; 15 from the Death Match; and 15 from New Hires.

The cases will be reviewed from the start of the relative process, ensuring the matches are timely and correctly generated tasks; the tasks are being addressed by the RI DHS Field Staff per policy/ procedure and the appropriate follow on steps have been taken. The cases will be followed through to resolution.

Interviews will be conducted with the field staff in the Providence DHS Office; fraud unit at the Department of Administration; and the hearing office at the Executive Office of Health and Human Services.

For the EBT multiple card issuance section: The reviewer will obtain a list of 25 cases with the highest number of EBT card replacements in the month prior to the review month.

These cases will be reviewed for related case noted and information regarding the replacement process. The local office staff will be interviewed for their role in the

replacement process and their understanding of the policies. The Woonsocket office staff will be used for field interviews.

The review will include a review of the notices sent to clients, including triggers. And the results of the notices: Client actions; staff actions; potential referrals to fraud and; resulting outcomes from the fraud investigations.

**Scope:** The ME reviewer will conduct the reviews of the files and interviews with field and central office staff as well as interviews with fraud staff and leadership.

**Outcome:** Review findings will be reported to program leadership and applicable Department managerial staff. Corrective action plans will be required.

**Completion Date:** August 2019

#### **Assessment of Corrective Action:**

**Goal:** To ensure the areas with any identified deficiencies are documented; communicated to the respective individual responsible and a plan for correcting the deficiency is developed.

**Measure:** Does the respective corrective action plan adequately address the finding. Is there a realistic time frame and what are the milestones?

**Methodology:** The respective party who is responsible for the element from which the finding originated will be notified of the finding in writing within 30 days with a 30-day time frame for providing a written corrective action for the finding.

**Scope:** The findings and corrective actions will be tracked until completion. The trends of the findings will be evaluated and compared to trends found in other reviews for common threads.

**Outcome:** The findings and related negative issues will be reduced resulting in more accurate, accessible and timely service to SNAP clients.

**Completion Date:** September 2019

#### **Able-Bodied Adults Without Dependents (ABAWD) tracking and policy compliance for counties/project areas transitioning-off of Statewide time limit waivers in FY 2019**

##### **Review**

**Goal:** The goal of this review is to determine how well the RI DHS is implementing the FNS ABAWD policy from identifying individuals affected; correctly identifying their respective status for a moment in time and over a period of time; accurately tracking their ABAWD status; offering programs to mitigate the ABAWD policy's negative effects on client SNAP participation; ensuring participation in programs is accurately reflected in RIBridges; Notices are correct

and timely, reflecting changes in ABAWD status; to ensuring the reporting on ABAWDs is timely and accurate.

**Measure:** Reports on client's ABAWD status are accurate; The system accurately tracks the point in time and changes in ABAWD status; Notices and triggers for the notices are accurate; clients are aware of their ABAWD status and how to change their status if required; Clients are offered a chance to participate in the E&T program; The referrals, participation and completion of E&T programs are accurately tracked and reflected in the RIBridges system and the case and benefits are accurate for the current status; FNS required reports related to ABAWDs are accurate and submitted timely.

**Methodology:** 30 cases with ABAWD status will be chosen for the sample. 10 ABAWD- yes, (5 open cases and 5 cases that have just closed for ABAWD reasons), 10 ABAWD- no and 10 ABAWD exempt. The cases will be reviewed for accuracy with regards to elements that contribute to the ABAWD status. The ABAWD – yes cases will be used to check notices and triggers for the notices.

A sample from each of the 3 groups will be checked. Those individuals' identification numbers will be checked to see if they are reflected in the Department's ABAWD reports correctly.

The voluntary E&T process will be checked from referral, program participation status to the tracking of the status in the RIBridges system.

Interviews will be conducted with state level individuals in the SNAP team using the tools in the ABAWD review guide, modified for RI. Office level interviews will be conducted in the Providence office using the modified tools. Although Providence's "catchment area" does not include cities or towns that lost their ABAWD waiver status, there is no wrong door for applications and case processing. All ETs should be knowledgeable with the ABAWD process, especially ETs who may not be faced with the issue regularly.

The status of the data for the FNS 583 will be reviewed and the status of the report submission will be reviewed.

**Scope:** The reviewer will conduct case reviews from the desk and will conduct staff reviews/ interviews in the Providence DHS office for the SNAP administrative staff as well as for the RI DHS field staff.

**Outcome:** The reviewer will produce a report of the findings identified during the review. The responsible person/ section will be notified of the findings and will be required to provide a written corrective action response.

**Completion Date:** June 2019

#### **Assessment of Corrective Action:**

**Goal:** The goal of the corrective action response is to mitigate, minimize and rectify all of the findings reported during the review.

**Measure:** Does the respective corrective action plan adequately address the finding. Is there a realistic time frame and what are the milestones?

**Methodology:** The respective party who is responsible for the element from which the finding originated will be notified of the finding in writing within 30 days with a 30 day time frame for providing a written corrective action for the finding.

**Scope:** The findings and corrective actions will be tracked until completion. The trends of the findings will be evaluated and compared to trends found in other reviews for common threads.

**Outcome:** The findings and related negative issues will be reduced resulting in more accurate, accessible and timely service to SNAP clients.

**Completion Date:** July 2019

#### **SNAP-Ed. Review:**

**Goal:** The goal of this review is to identify regulatory deficiencies and vulnerabilities in the administration of SNAP-Ed at the State and local levels; To improve Program operations, expand Program reach, increase effectiveness, develop new nutrition education and obesity prevention strategies, and provide technical assistance; To recognize Program excellence and best practices.

**Measure:** Using the guides from the FNS SNAP Ed review guide, review all of the areas contained in the guide including: The Program Integrity Tool; the Civil Rights Tool; and the Community Partner Interview Tool; and the Fiscal Integrity Tool the provider should meet the minimum criteria provided

**Methodology:** Using the tools contained in the SNAP Ed review guide and any RI DHS fiscal guides, along with a member of the State's financial management team, the team will conduct interviews with the SNAP Ed program staff and review training materials.

The ME team will also observe SNAP Ed training sessions

**Scope:** The ME reviewer with assistance from RI DHS Financial Management, will review the SNAP Ed financial documents and process and will review a SNAP Ed presentation including the process to identify the audience, topics to be covered, the presentation itself and the anticipated outcome of the presentation and the actual outcome of the presentation.

**Outcome:** Using the available tools, RI DHS will review the afore mentioned topics. Findings will be documented, and a report generated for the SNAP Ed contractor with a corrective action plan required within 30 days. The plan should include the path to remedy the finding as well as a realistic time frame.

**Completion Date:** February 2019

**Assessment of Corrective Action:**

**Goal:** To provide a SNAP Ed program that meets the goals of the SNAP program and delivers timely and relevant information to the audience and produces the desired and intended results

**Measure:** The CAP will be reviewed and if found to be accurate and realistic, the measures will be tracked by the ME reviewer and SNAP Corrective Action Officer. The response will need to remedy the finding to a point that it meets or exceeds the required federal guidelines

**Methodology:** The ME reviewer and SNAP Corrective Action offer will track the CAP and it's components to ensure the SNAP Ed program remains on track as planned. Once the finding is remedied, the ME officer will verify completion with the appropriate tools/ review.

**Scope:** Any/ all of the findings will be tracked until completion

**Outcome:** The SNAP Ed program will meet or exceed all of the federal and state requirements and desired outcomes.

**Completion Date:** March 2019

**Administrative Terminal System Security Review:**

**Goal:** To review the EBT security plan and ensure that the system and process are following the required rules and provide the RI DHS with any deficiencies in the reviewed areas and require a CAP that will bring the system and processes into compliance in any deficient areas.

**Measure:** Using FNS guidance, The ME reviewer will review:

1. The controls in place to ensure the segregation of system operations functions from reconciliation duties.
2. RI DHS' security program for MIS systems will include a periodic risk analysis that addresses the following EBT issues:
  - a. EBT System vulnerability to theft and unauthorized use;
  - b. Separation of duties between those responsible for EBT operations and those responsible for EBT reconciliation;
  - c. Completeness and timeliness of the reconciliation system;
  - d. Vulnerability to tampering with or creating household accounts
  - e. Erroneous posting of issuances to household accounts
  - f. Manipulation of retailer's accounts such as creation of false transactions or intrusion by unauthorized computer users;

- g. The controls in place to monitor User IDs and Passwords; and
- h. Monitoring the inventory of unused cards

**Methodology:** The RI DHS ME reviewer, using FNS guidance, federal laws and the review tools related to EBT operations in the “SNAP System Integrity Review Tool,” RI DHS will develop and create check lists and tools to aid in the review of the EBT systems.

The reviewer will conduct interviews with State EBT Staff, eligibility systems vendor staff, and network systems staff to review security measure at each level of use of the EBT system. This will include the physical security of the cards, electronic security of the benefit process and the monthly benefit reconciliation, ensuring accountability of EBT funds through the issuance and recovery process. State office staff who are responsible for issuing and maintaining EBT card stocks at the office level will be interviewed. The Providence DHS office staff will be used for these interviews.

The EBT coordinator at State level and the reconciliation staff from Financial Management will be interviewed.

Findings will be presented to the State and applicable parties and a CAP will be required for any findings issued.

**Scope:** The review will cover the path of the physical EBT card, from receipt by the RI DHS Coordinator through to the issuing of the card to the client. Physical security and accountability at each step will be verified.

Systematically, the RIBridges system will be checked for any security loop holes that allow the creation of an account and the issuance and accessibility of SNAP benefits outside of the approved accountability process.

The review will also cover the fiscal accountability from issuance through reconciliation.

**Outcome:** Findings from the various aspects of the review will be reviewed and provided to the responsible individuals for the development of the CAP that shall include the path to resolution and realistic time frames to reach resolution.

**Completion Date:** August 2019

#### **Assessment of Corrective Action:**

**Goal:** To achieve and verify a fully functioning and regulatory compliant EBT process to include the physical cards, the electronic system and the reconciliation of the benefits.

**Measure:** The CAP provided adequately addresses the findings and attainable goals and time frames are set. Completion will be attained when the finding results are resolved and verified.

**Methodology:** The CAPs will be tracked and monitored by the ME reviewer and the Corrective Action officer through the process to completion.

**Scope:** The respective responsible parties will be held accountable for their own sections of the CAP through tracking the topics and time frames and requiring periodic updates.

**Outcome:** Findings are resolved and the EBT process, including systems, physical card handling and benefit reconciliation are operating as required.

**Completion Date:** September 2019

**Recipient Claims Management/Treasury Offset Program Review:**

**Goal:** The goal is to ensure that the RI DHS CCRU, Claims, Collections and Recovery Unit's operations are programmed correctly, and the unit is meeting federal guidelines. The review will identify and report any short comings and identify required corrective actions to resolve the finding(s).

**Measure:** Using the guides provided in the FNS "ME Review Guide Recipient Claims, 9-2017", the ME reviewer will assess the following topics:

- a. Claims establishment (Timeliness and backlog)
- b. Claims collections
- c. Quality Control Error Review
- d. Treasury Offset Program
- e. Security

**Methodology:** The RI DHS CCRU is not yet functioning. Once the unit, and its operations, is fully functioning a review date for this Target will be set.

The ME reviewer will use the ME Review Guide Recipient Claims 09-2017.

65 cases will be sampled: (Cases events that triggered the CCRU action should have happened 4 months prior to review)

Establishment & Collection Case: 25 established IPV, IHE, AE claims

Quality Control Error Review: 15 under issuances and 10 over issuances

Treasury Offset Program Review: 15 delinquent cases

Using the tools and worksheets contained in the Guide, RI DHS ME reviewer will review each of the cases and interview the CCRU staff.

**Scope:** The review will encompass: the Claims management Plan; Claims referrals; Claims establishment, including backlog and timeliness of processing including notices, fair hearings and client's due process; Collections including timeliness of recoupment and repayment agreement, delinquency determining and TOP; and the Maintenance of Claims

**Outcome:** Findings from the various aspects of the review will be reviewed and provided to the responsible individuals for the development of the CAP that shall include the path to resolution and realistic time frames to reach resolution.

**Completion Date:** Spring 2019 – TBD based on CCRU functionality

**Assessment of Corrective Action:**

**Goal:** The goal of the CAP and overall review is to ensure that the CCRU processes are programmed correctly in the RIBridges system and that they are functioning as planned.

**Measure:** The CAP will be reviewed for realistic goals and timeline to completions. Does the completed state in the CAP meet the federal requirements

**Methodology:** The CAP proposed corrective actions leading to the anticipated end state will be compared to the applicable federal requirements. Each of the findings will be tracked with milestones anticipated through the completion of the process.

**Scope:** The respective responsible parties will be held accountable for their own sections of the CAP through tracking the topics and time frames and requiring periodic updates.

**Outcome:** The findings will be resolved. The system and processes will be working as planned in accordance with federal and state requirements.

**Completion Date:** Spring 2019 – TBD based on CCRU functionality

Review instruments (Attachment A) for the FY2019 review are attached. If you require further information, please contact William O'Donnell at (401) 415-8294

Sincerely,



Bethany Caputo  
SNAP Administrator

Cc: Courtney Hawkins, Director Department of Human Services  
Yvette Mendez, Deputy Director Department of Human Services  
Maureen Donnelly, Associate Director, Department of Human Services  
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