Rhode Island Department of Human Services

Supplemental Responses

To FNS' Questions

Regarding the State's

December 2016

Corrective Action Plan

Submitted January 31, 2017

PREFACE

As you are aware, Governor Gina M. Raimondo recently re-organized the State leadership team on the UHIP project, and tasked the Acting Director of the Rhode Island Department of Human Services with conducting a 30-day assessment of the current status of the system.

The State recognizes the critical importance of providing accurate, timely responses to questions previously submitted by the Food and Nutrition Service (FNS) and has therefore produced the responses below. However, as the Acting Director's assessment is ongoing, the State must caution that the answers below may be subject to change and revision, and the State will share copies of any future public reports with FNS.

SECTION 1: SYSTEM TECHNICAL PROBLEMS

Section 1.1 – IT Technical Leadership

FNS Inquiry:

To ensure that the State is exercising the appropriate oversight of the system vendor, the State must designate a lead from either the Executive Office of Health and Human Services (EOHHS) or DHS for this action item in addition to the lead from Deloitte.

State Response:

The State of Rhode Island has appointed Ken Brindamour as the IT technical lead for the implementation of RI Bridges. Mr. Brindamour has extensive experience in running large scale software and infrastructure programs. At Atrion, CSC and General Dynamics, he led large teams to build and operate complex technology solutions including public sector solutions.

Section 1.2 – Priority Software Defect Definitions

FNS Inquiry:

The State must define "large group" vs. "small group" in the context of the State's discussion of "Priority 2 (P2) issues that may affect large groups of customers, and are thus categorized as blocking issues" and provide additional information on how the State monitors the vendor's issues prioritization, root cause resolution, and incident recurrence.

State Response:

The following are working definitions that our vendor uses to categorize incidents:

Priority	Description	Impact Threshold
P1	A complete failure of an Application or supported process in the Production	An entire system portal (customer portal, worker portal,

	Instance has occurred. There is no work-around for the problem. A majority of end-users of the Production Instance are affected or an entire business division is affected or the outage has occurred during a critical business process or period, such as end of the month or, end of the year processing. Priority 1 ticket will take precedence over all other requests.	child care portal) is unavailable with no systematic workaround. All users for that portal are impacted.
P2	Major issues exist within an Application or supported process in the Production Instance. The issue affects large portions of the user community. This includes high visibility issues involving upper management or time sensitive issues. Examples of this priority level include inability to run critical reports.	Over 50 cases/accounts are blocked from receiving benefits or health coverage with no systematic workaround to get benefits or health coverage.
P3	Issues exist with an Application or supported process in the Production Instance that affect a few users on a regular basis, thereby preventing some work from being accomplished. Examples of this type of priority would be inability to access implemented functionality or implemented functionality not operating as it should.	Less than 50 cases/accounts are blocked from receiving benefits or health coverage. Systematic and/or technical workaround in place to issue benefits or health coverage.
P4	An informational inquiry or nonrecurring issue exists with the Production Instance that affects a few non-critical users or processes. Workarounds are readily available.	No impact to benefits or health coverage

Section 1.3 – Blocking Issues

FNS Inquiry:

Identify blocking issues affecting large groups (P2 and P3) along with the RIB #s and align them with the three stages of system maturity.

State Response:

As of Saturday, January 28, 2017, the RIBridges system does not currently have any open P2 issues. There are five active blocking P3 incidents related to the SNAP Program.

Blocking P3 Incidents Open on January 28, 2017:

Key	Description
RIB-12847	Workers are seeing an incorrect denial reason for certain cases during authorization of SNAP and RIW programs as part of the recertification process. Reported 1/23/2017 (Current Status: Development in Progress) **Target Resolution Date: 2/4/2017**
RIB-12145	The system is denying SNAP for a customer having multiple accounts. Reported 1/12/2017 (Current Status: Resolved) **Resolved: 01/30/2017**
RIB-11408	While running eligibility process for a SNAP case, the system incorrectly created a verification task. Reported 1/4/2017 (Current Status: Analysis in Progress) **Target Resolution Date: 2/4/2017**
RIB-11047	A screen error occurred while processing a case during recertification **Reported 12/28/2016 (Resolved—Included in the 1/29/2017 system release)**
RIB-10276	The system displayed an edit message – Data Integrity error during case authorization. **Reported 12/19/2016 (Resolved—Included in the 1/29/2017 system release)**

Each of the defects listed above impacts a single case or at most a handful of cases. There are no currently pending blocking SNAP issues impacting large groups of SNAP customers.

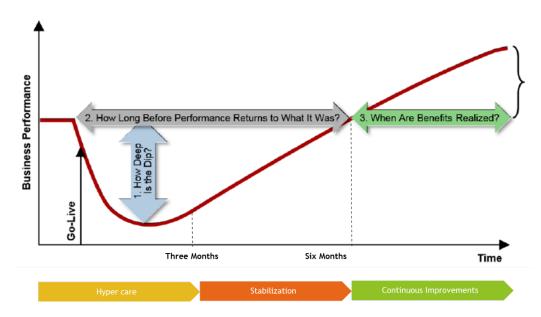**Section 1.4 – Industry Standards for System Stability**

FNS Inquiry:

Provide additional information regarding specific industry standards for system stability that the State is referencing. Are these reflective of any contractually obligated performance standards against which the vendor is being held accountable?

State Response:

As noted in the State's earlier response, relevant industry standards set forth by Gartner in December 2015 provide a useful benchmark to evaluate RIBridges system performance. Gartner outlines several stages of support for a new integrated system development after go-live: Hypercare (first three months), Stabilization (months 3-6) and Continuous Improvement (post-six months).

Gartner points out in the table below that it is common for business performance to experience a precipitous dip in the months before go-live (as the focus of the organization shifts to implementing the new system) and in the months after go-live during the Hyper-care period. However, as the system is stabilized, performance should begin to improve, with the goal of exceeding prior business performance levels within six months.

To date, the State has most directly evaluated Deloitte's performance primarily by examining the reported number and severity of production incidents. Deloitte regularly reports updates on its progress towards targets. These metrics and benchmarks are as follows:

Hyper-care:

- Reduce the Priority 2 incident backlog to less than 5
- Reduce the Priority 3 blocking* incident backlog to less than 125

Stabilization:

- Maintain the Priority 2 incidents backlog at less than 5.
- Reduce the Priority 3 blocking* incident backlog to less than 25
- Reduce the Priority 3 non-blocking incident backlog to less than 1,000

Continuous Improvement:

- Priority 1, Priority 2 and Priority 3 blocking* incidents should be rare and prioritized immediately when identified and resolved within 7 days.
- Reduce the Priority 3 non-blocking incidents to a manageable number and maintain the backlog at this level.
- Focus on system improvements; problems that cause incidents should be resolved.

*Blocking incidents are defined as Priority 3 incidents that are blocking customers from receiving benefits or health coverage.

Current Progress

The State is currently working with Deloitte to define additional metrics and benchmarks that would sufficiently capture all aspects of system performance and related operations, including the impact of existing manual workarounds and deferred functionality that has not yet been introduced into the system. Progress toward the goals that were previously set for Stabilization and Continuous Improvement milestones for P1, P2 and P3 are also being monitored.

Accountability

The State's contract with Deloitte holds the vendor accountable for advancing the system's maturity through Service Level Agreements (SLAs) on the following metrics:

- System Availability
- Processing Performance
- Real-time Transaction Performance
- Business Continuity
- Software Deficiency Resolution

Since go-live in September 2016, Deloitte has reported meeting 24 out of 25 SLAs each month. The unmet metric reported pertains to Severity 2 Software Deficiency Resolution. The measure for Severity 2 Deficiencies provides that resolution must be completed in an average of three days or less, with monthly reporting of the metric. Experience during the system stabilization period is reported by Deloitte as showing that the resolution timeframe for this service level category has averaged between three and six days. The most recent data the State has received has shown that both the volume of Severity 2 Deficiencies and the resolution timeframes have decreased, with current resolution time for in the last month averaging under four days.

The State is currently in the process of developing additional measures to more comprehensively track the impact of the UHIP system on overall operations and performance.

SECTION 2: ONGOING TRAINING NEEDS

2.1 –Additional Staffing

FNS Inquiry:

Incorporate a tentative hiring and training plan into the revised CAP with expected timeframes. Will new hires be trained in all programs? Will new hires have a focus on specific programs?

State Response:

DHS has hired 19 limited term appointment eligibility technicians (ETs) to assist in the processing of SNAP applications and has posted 25 permanent civil service ET positions for immediate filling. Civil service exams were conducted in several rounds during December and January and candidates successful in the examination will now be notified and on-boarded as they are free to start work. The limited term appointment ETs will serve at least through July, 2017 and may be extended beyond that depending on the staffing needs of the agency. The permanent civil service positions, in combination with the limited term positions, are expected to yield a net increase of 44 ETs available to address the application backlog.

DHS has coordinated with Deloitte to schedule a training program that includes a week of policy training and on the job training using the RI Bridges system to determine eligibility of SNAP applications as a team. The limited term ETs received this training the week of January 23, 2017 and it will continue for other permanent ETs as they are hired.

In addition, the state is hiring 20 seasonal clerical staff who will assist in scanning and indexing and registration of applications. Clerical hires will receive three days of training which include procedures for scanning and indexing, application registration and RI Bridges applications.

Below is the timeline of civil service exam administration and hiring:
- The initial posting period for the civil service exam for ETs was from 10/31/2016 – 11/18/2016.
- The examination was administered on 12/13/2016 and 12/14/2016.
- The examination posting was extended from 12/9/2016 – 12/16/2016.
- Additional testing occurred on 1/12/2017.
- Small groups of makeup examinations were given as well, mostly due to medical issues that prevented test takers from sitting for their scheduled exams. One final makeup exam occurred on Monday, 1/23/2017.

- The last exam appeal for candidates who had been determined ineligible to sit for the exam was on 1/20/2017. Successful appellants took the exam on 1/23/2017.
- The HR division is in the process of analyzing the exam results in order to publish the list of those eligible for hire based on examination results.
- 25 full time ET positions were posted on 1/27/17. The positions will be posted for 5 days. HR & DHS will interview candidates the week of 2/6/17 and notify the successful candidates.

The training curriculum is attached as an addendum to this Supplemental Corrective Action Plan filing.

As part of the 30-day assessment of the UHIP deployment that is currently underway, staffing levels in all areas of DHS are being examined.

2.2 State Program Policy Staff

FNS Inquiry:

Confirm that program policy staff will be included in the development of training materials and will be present when the trainings are held. Provide copies of the training materials utilized in November and December for Redeterminations, Interims and SNAP eligibility. Specify whether training includes both planned system operation and any current interim processes to work around system defects. Address frequency of trainings and whether trainings are mandatory for all ETs. How will staff competency in the new system be evaluated?

State Response:

The DHS Staff Development Unit (SDU) is comprised of five staff including an assistant administrator and four trainers. They provide training throughout the year. The SDU has defined the policy components of RI Bridges training, support delivery and coordinates logistics (attendance, locations) on behalf of the State. The SDU has also attended classroom training and refresher workshops (where deemed appropriate by topic) and has participated in training delivery in both venue types.

Small workshops on Redeterminations and Interims were held in all DHS offices between the dates of Monday, December 5 – Monday, December 12, 2016. Fifteen (15) half-hour sessions were held, with 118 workers in attendance including Eligibility Technicians, Social Case Workers, Supervisors and Clerical staff. Training was designed to ensure that workers know how to process and reference redeterminations and interims in RIBridges. The training featured system and process job aids which were provided at the session and were provided to site supervisors for electronic distribution.

Training materials are attached as an addendum.

SNAP trainings were delivered by the SDU with specific focus on policy, system use and troubleshooting guidance. Specific topics included a review of the basic

requirements of SNAP eligibility, and how to address frequent program and policy questions. Sessions included a job aid for reference by State staff. Three (3) of the 13 planned half-hour workshops were held between Monday, December 12 and Wednesday, December 14, 2016, and were attended by 20 staff including Eligibility Technicians, Social Case Workers and Clerical levels. These workshops were postponed effective December 14, 2016 to prioritize staff to focus on case handling. The workshops are scheduled to resume on February 20, 2017**.**

The state is also shifting from activity-based and academic-style training to performance-based training. As we move towards this new method of training, a short narrative on this new form of training is provided below.

In the act of learning, people obtain content knowledge, acquire skills, and develop work habits—and practice the application of all three to "real world" situations or systems. Performance-based learning and assessment represent a set of strategies for the acquisition and application of knowledge, skills, and work habits through the performance of tasks that are meaningful and engaging to students.

Performance-based learning and assessment achieve a balanced approach by extending traditional fact-and-skill instruction. Performance-based learning and assessment are not a curriculum design. Trainers do not have to "give up" units of study or favorite activities in a performance-based learning environment. Because authentic tasks are rooted in curriculum, trainers can develop tasks based on what already works for them. Through this process, assignments become more authentic and more meaningful to workers. This approach is focused on the actual tasks that our workforce is called upon to do in the performance of their daily jobs.

The state is using the new limited term ET hires to create a baseline to establish a solid foundation for the performance based training program. We plan on having the program ready for the full time hires that will be hired in February.

2.3 Training Evaluation:

FNS Inquiry:

What evaluations are in place for each of the training sessions as a way to monitor overall effectiveness and identify additional training needs?

State Response:

Consistent with best practice, evaluations are distributed and collected at the conclusion of each training session. The responses from staff on these evaluations provide feedback on whether the training is effective and on additional areas of training need. In addition, SDU reviews and considers evaluation feedback for improvement of future trainings.

Section 3: BUSINESS PROCESS IMPROVEMENT

3.1 Productivity Targets

FNS Inquiry:

What is the plan for communicating productivity targets to workers and what is the plan if productivity falls below targeted levels?

State Response:

The productivity targets included in the Corrective Action Plan were based upon the software capabilities, business processes, and staffing models in place at that time. Since then, DHS has worked with Deloitte to implement software fixes as well as improve business processes to bolster and reallocate staff. These improvements are anticipated to continue. Such changes will also improve our data quality to evaluate our stable operating model, inform staffing needs, and refine training to improve productivity.

We currently monitor productivity of eligibility technicians with 2 metrics. First, we monitor the number of applications worked per worker per day on average. In this case, "worked" means that a worker was in RI Bridges on a particular case, not necessarily that the case reached an eligibility determination. We have seen recent improvement in this metric; in December we averaged 5 cases per worker per day. In January, we have averaged closer to 7 cases per worker per day.

The second measure of productivity is the % of cases for which data collection and eligibility are performed on the same day. This measures "one touch" of cases which is important for productivity, and an important measure for overall system health. If a worker is not doing the data collection and eligibility on the same day, it could indicate either a training issue or and IT issue with that particular application. For the last two months, this measure has fluctuated from 35% to 50% depending on the week.

Given this wide variation, we are focusing primarily on training, IT fixes, improving system performance and stabilizing work assignments before we publish and disseminate productivity targets. We want to use our data to understand where workers need additional training and where IT or other system problems may be inhibiting productivity.

When productivity targets are developed, we will communicate them to workers through the normal supervisory channels. It is important to us to put the data in the hands of our experienced supervisors, so that they can best manage their teams. If production falls below targets, we want to first make sure that the data sources we are using are accurate. Second, we will seek to understand the root cause (training, system, worker experience) and adjust accordingly to the facts on the ground.

3.2 Case Assignment Process

FNS Inquiry:

The process for assigning work to eligibility staff including: (1) how the State is generating assignment lists, (2) how the State is monitoring the distribution and completion of tasks, (3) how interview appointments are being scheduled and conducted, and (4) plan for the Worker Inbox.

State Response:

(1) How the State is generating assignment lists:

On a daily basis, an extract of all currently pending applications is pulled from the system and placed onto a SharePoint site with details surrounding the application status, program applied for, aging of the report, whether a request for documentation has been sent, and where an application is in the system. This list of pending applications is then sorted by program aging requirements (expedited > 7 days, non-expedited > 30 days, Medicaid > 30 days, etc.) to determine the prioritization of what should be worked. Once the prioritization is defined, the list is split into multiple lists and shared with State workers to begin processing of applications.

(2) How the State is monitoring the distribution and completion of tasks:

On a daily basis, the list created above is refreshed to reflect the latest status of all pending applications. This provides the latest status on whether a worker has processed an application to eligibility determination, to the point of a notice being generated, or is still in progress with the application. Supervisors and field operations leadership leverage the report to monitor and assess the work of the application registration team in addition to eligibility technicians. During critical times in the month (redetermination dates), the list is monitored by the State's leadership team multiple times a day to make sure redetermination applications are being processed and performance targets are being met.

(3) How interview appointments are being scheduled and conducted:

Currently appointments are being created in two ways. They are created in the lobby as lobby tickets through the system at the time a person enters the lobby and needs to meet with and ET or social worker. The client is called by number for their interview when the next ET or Social worker is available. The second method is an appointment created through the system by a non-lobby ET after working a case where an interview is required.

(4) Plan for the Worker Inbox: The State is re-designing the worker inbox with eligibility technician feedback to be more user friendly. The improved worker inbox went through user acceptance testing from December 27, 2016 – December 29, 2016. It passed this testing, and is currently in the pilot phase in the Middletown Office as of January 17, 2017. The redesign of the worker inbox replaces paper spreadsheets to assign work. The worker inbox will also aid in the ability for a supervisor to help workers in resolving case issues. It should also allow for a more flexible staffing model across

all non-lobby operations. The worker inbox still remains in pilot until all operational issues are resolved before full roll out to the field.

3.3 Application Registration

FNS Inquiry:

Clarify the plan for ensuring that all applications are registered within 48 hours.

State Response:

The application registration team housed in Providence has boosted productivity and is currently registering an average of approximately 200 applications per day. Our performance metric for this activity, defined as % of applications registered within 3 days of receipt, is available in the data supplements provided to FNS weekly on Mondays. Time for processing is calculated based upon the date received and is considered complete at the time of registration. The State is no longer relying upon the productivity chart submitted in the original CAP, which was based on productivity assumptions and proved to be inaccurate. Instead, the State is tracking and reporting actual time to registration and are maintaining registrations within 3 days of receipt.

3.4 Multiple Applications in a Single Case

FNS Inquiry:

Concern has been expressed that if multiple unworked applications exist in a case, the initiation of one application could cause the other unworked applications in the case to disappear. Explain what steps have been taken to ensure that the date of the earliest application submitted is preserved as the filing date.

State Response:

Upon investigation of this alleged issue, DHS has not found any system issue that would cause earlier filed cases to disappear from the system when a subsequently filed application is initiated. Rather, it is the result of a feature of the system that prevents customers from having duplicate or multiple active cases in the system. If a customer submits a new application but already has a case in the system or appears as a requesting household member in another case, the system prompts the worker who is processing the application to associate it to the previously existing case. If a customer submits multiple applications, and one of the applications is processed, the system currently closes all other pending applications for that customer. This prevents the duplication of cases. Further training and policy refreshers will be provided to staff to ensure that they are aware of the proper procedure for processing cases on which multiple applications have been submitted.

A gap has been identified with the above-mentioned procedure in that the worker may not choose to process the earliest received application when multiple applications are submitted, thus the customer may not receive benefits from the date they are entitled.

While a system logic solution is being developed to close the gap and remove worker discretion to process a later-received application, an interim procedure, described below, requires the reconciliation of all multiple applications to ensure that the earliest application date is being used as the benefit start date. If it is found that a customer had previously submitted an application with an earlier date, the case is adjusted to reflect the earliest application date and appropriate benefits are supplemented. The reconciliation process will also requires moving all received multiple applications under the active case. This enables anyone working on the case to have access to all documentation submitted by the customer. Additional training will be provided to staff to ensure that consistent and proper procedures are being followed.

Benefit restoration for any client who has submitted multiple applications is in progress and will be completed by February 14, 2017. The process for identifying these cases is to look for any individual who has submitted more than one application since the launch of RI Bridges. Once this list has been identified, analysis will be performed to compare the initial benefit date to the date of the first application submitted. Any individuals who have not received benefits back to the first application date will receive retroactive eligibility and benefits as long as the household information is consistent across both applications. If the household information in the multiple applications is different (income information or household size differences), then the State will confirm that both applications were processed in the correct order and that the application that relates to the relevant benefit period is the application that is used to determine the benefit amount for each relevant period.

3.5 Timely Application Processing

FNS Inquiry:

Details regarding the number of staff assigned to reducing the backlog and ensuring that every case is processed in a timely manner including the timeline for elimination of the backlog.

State Response:

Since the submission of the CAP, the State has taken a number of steps to reduce the backlog. These include:

1. Establishing a dedicated SNAP team of non-lobby eligibility technicians to address incoming applications. This team is headed by Tom Guthlein and Shannon Massaroco. This team is staffed with 10 FTEs at a minimum, and will continue to increase as new staff is hired. We have found that this dedicated team improves productivity by giving staff an increased comfort level with RI Bridges during this early period.
2. Establishing a dedicated recertification team of non-lobby eligibility technicians to focus solely on processing recertifications. This team is also headed by Tom Guthlein and Shannon Massaroco, and is staffed with 10 FTEs.

3. The State is using the same data extract provided to FNS to generate daily excel lists for the field. In this way, we have been able to monitor output, troubleshoot issues, collect notes on applications, and ensure that workers are processing the highest priority cases (SNAP Expedited > 7 Days and SNAP Regular > 30 Days.)
4. Using the same data extract, we monitor work in progress applications on a daily basis, including the size of the pending application and recertification work to be completed, to make staffing decisions. We add to the dedicated SNAP and recertification teams as necessary, and utilize overtime where possible to improve throughput.
5. The State has refined scanning and indexing procedures to reduce mis-indexed applications. This includes reworking certain screens in RI Bridges to make it easier for workers to identify the document and index it appropriately.
6. The State has also improved data extracts from UHIP to ensure that the backlog is being accurately measured. For example, we believe we may have been including cases in the "backlog" where a SNAP determination had already been made, but other programs eligibility decisions such as cash assistance or Medicaid, were pending for the same case. We have discontinued this practice, resulting in more accurate backlog tracking.

Since the implementation of these efforts, we have seen significant improvement in our SNAP backlog.

- Overdue Expedited SNAP has gone from 1051 on 12/08/16 to 600 on 01/29/17, a 35% decrease in one month.
- In the month of January we averaged ~800 determinations per week. This is up from an average of ~620 per week in December.

We are currently developing a more stable operating model to determine deadlines for timeliness targets.

Many of the inputs for this model are currently in flux, and we do not believe that we have enough information yet to accurately set a deadline to "clear" the backlog. For example, as described more fully above, we are in the process of hiring additional eligibility technicians who need to be trained. Additionally, the worker inbox has not yet been rolled out to all offices and its effect on productivity is not yet known.

3.6 Benefit Restoration for Applications Not Timely Processed

FNS Inquiry:

Ensuring that the applications processed are filed with the first date received as the effective date and that benefits are restored for earlier filed but unprocessed applications.

State Response:

The State has conducted a review of field office operations to make sure all applications, including those submitted prior to the launch of the new system, which were not processed in the legacy system or during the blackout period are identified and processed. The central scanning team has been responsive in scanning applications (including those submitted prior to go-live and during the blackout period) into the RI Bridges system. In addition to conducting a diligent search of every office for paper applications that may have been misdirected, a daily report is generated showing all scanned and indexed applications which have not yet been registered to have these applications registered within 48 hours of receipt of the application. All scanned/indexed applications are being monitored for timeliness of processing in accordance with program guidelines as discussed above.

Benefit restoration for any client who has submitted multiple applications is in progress and will be completed by February 14, 2017 as described fully in Section 3.4 above. A report will be generated from this activity which will include the number of cases that received restoration of benefits; the total amount of benefits restored; and the application date/approval date. We will submit an update to FNS in the week following February 14, 2017.

The process for identifying these cases is to look for any individual who has currently submitted more than one application since the launch of RI Bridges. Once this list has been identified, analysis will be performed to compare the initial benefit date to the date of the first application submitted. Any individuals who are not receiving benefits back to the first application date will receive retroactive eligibility and benefits as long as the household information is consistent across both applications. The timeline for these activities is below:

- 1/31 – Identify duplicate applications
- 2/1 – 2/3 – Review duplicate applications to assess benefits
- 2/4 – 2/7 – Write data scripts to restore benefits to the first application date (if any are found)
- 2/8 -2/12 – Test data scripts written to restore benefits
- 2/13 – Migration of data scripts to the production environment
- 2/14 – Execution of data scripts in production and restore the benefit back to the original application for the multiple applications

In order to ensure that the scope of work is known across all programs, the state has created a Standard Operating Procedure (SOP) that requires that all paper applications and case related paperwork that is not scanned and indexed be forwarded to central scanning for processing at the end of each business day without fail. The central scanning supervisor (George Bowen) was sent to do a physical walk-through of each branch office to ensure no applications, mail or associated paper connected to applications is being stored at branch offices. This SOP ensures that applications and associated paperwork that are delivered or mailed to a branch office reliably arrive at a central control point.

Section 4: Office Overcrowding and Wait Times

4.1 Providence Lobby

FNS Inquiry:

Additional information regarding any changes to the Providence lobby plan and timeline for completion of improvements to the lobby process.

State Response:

Location of Clerks and Line Outside

The state has developed and deployed an inclement weather plan for use in the Providence lobby. Under this plan, an estimated 60 customers are able to freely pass through security and queue in front of a greeter. The purpose of the greeters is to ensure the clients are directed to the proper lobby window or other lobby location (e.g., scanning station).

Two Eligibility Technicians Assigned to Second Lobby

Currently two Eligibility Technicians and an interpreter support a second lobby in Providence. This space was established in early November to better serve customers and provide an alternative to entering the primary lobby for persons standing outside who are seeking only to check on their application status. If, when a customer is seen in the Second Lobby, other action is available and appropriate (e.g., an appointment, document scanning) the customer is referred to the primary lobby for the additional service.

Second Lobby Capacity

The second lobby holds 25 people. This area was designed to provide status checks on to clients. These status checks are specifically designed to avoid a client waiting in the line to the main lobby for a status check. This strategy diverts customers who are seeking information only from the main lobby line to ensure that people who need more than to check their application status can be seen more expeditiously.

Staff Responsibility for Lobby Operations

The Providence office is presently supported by an Office Lobby Manager and Supervisor who monitor lobby conditions, workload, and staffing. These leaders confer and engage with State Operations leadership with recommendations for adjustments and to effectuate any needed changes.

Customer Length of Encounter and Proximity to Others

As identified earlier, there are space constraints identified in DHS lobbies which are being studied and are in process of remediation across the State. We are confident that successful deployment of these efforts will help address proximity concerns identified.

The timeline for expanding lobby in operations is as follows:

The second lobby is being used to aid customer in researching the status of their applications. This function helps reduce clients wait times by not having them not entering the main lobby. At the same time, behind the existing second lobby there is a much larger area where a new, larger lobby is under design and contractor bidding process. The estimated time of final construction is March 2017. The new lobby will provide a larger space and more seating for clients overall.

The following bullets are designed to provide a timeline of work to correct and improve lobby operations. Within the constraints of the number of people allowed in the primary lobby by Fire Code (167) we continue to work different plans. This includes building the new lobby, referenced above, which will of course handle additional volume of people.

Observation 1: November 1- 15, 2016

- Lobby overcrowding due to combination RI Bridges application issues, along with DHS business process issues, and configuration of line management
- No organization and/or written procedure for front lobby management

Actions taken as a result of Observation 1: November 15 - December 1, 2016

Created five window stations to help with the organization of the Providence lobby and segregated tasks in these windows. Creating program specific windows streamlines the flow for customers and accelerates worker productivity;

- Window 1 – SNAP (EBT) ET/SW
- Window 2-4 Triage ET for multiple-issues
- Window 5 – EBT Replacement (1010 Form)/Verification letters ET
- EBT Replacement Print Card Station ET
- Scanning Station for customer clerks (copiers for customers)
- Relocation of Drop Box (outside)
- 2 Greeter Stations Clerks (individuals first check in, and are directed)
- Added lobby 2 with 2 ETs. It was observed that a meaningful proportion of the outside line contained individuals that were just checking on the status of their applications. So, this station was created for the sole propose of checking the status of applications. These individuals do not enter the main lobby resulting in faster service in the primary lobby.

November 15-30, 2016: The inclement weather procedure was written and reviewed during this time period. The objective of this procedure was to allow more individuals waiting in the main line to stand inside while waiting for check-in with greeters. This includes two line configurations, with action items. This also allows the lobby supervisor

to control the volume of people within the front lobby to ensure there is no overcrowding.

Week of December 12, 2016: The inclement weather procedure was updated based on input and distributed to lobby managers.

Observation 2: November 15 – 30, 2016

Within the facility at 206 Elmwood Ave in Providence, there is the space behind the second lobby which is roughly larger in square footage size then the current primary lobby. This space can accommodate the current overcrowding in the main lobby. This space was originally slotted for the department call center, however it was decided by management to redeploy this space to accommodate the volume of individuals coming to the Providence office.

- During the week of November 15, 2016, DHS contacted DCAMM within the Department of Administration regarding the lease on this location.
- DCAMM agreed to assist in evaluating the concept of creating a new main lobby.
- Then, the team determined the actions needed to complete the assessment. To determine the concept and cost moving forward with this project; the space was cleaned, boxes were removed and 30 - 40cubicles that needed to be disconnected from data/power source were removed. Also, DCAMM met with DHS to determine lobby operational needs and process flow, and contracted the A&E firm through a request for proposal for drawings of the space and layout. This helped to determine the cost. We have also been coordinating with the building owner and working to change the space as a result of the space study.

Actions taken Regarding Observation 2: December 5, 2016 - ongoing *(Note: future dates are estimated timelines)*

- Coordinate and remove data/electrical wiring to cubicles from December 15 – 30, 2016 (Completed)
- Coordinate removal of cubicles was ongoing in January 2017 (Completed)
- Obtain A&E study – to be condcuted from January 15, 2017 – March 31, 2017
- DCAMM and DHS met to determine lobby operations needs for the new lobby from January 16, 2017 – January 30, 2017 (Completed)
- The coordination with the building owner for work to be completed will run from March 31, 2017 – May 31, 2017.

4.2 Woonsocket & Pawtucket Lobbies

FNS Inquiry:

Additional information about improvements to the Woonsocket and Pawtucket lobbies.

State Response:

After adding a SNAP expedited window to the lobby in Providence, we saw clients' wait time decrease. The redesign and location of the SNAP expedited new window meant that DHS was able to process applications in an average of 30 minutes. This window was designed with an ET and social worker to ensure processing is quick and accurate. This plan is also being incorporated into the Warwick, Pawtucket, and Wakefield offices.

The following actions have been taken at each site:

- Wakefield Office: Met with the building supervisor from the state on December 12, 2017 about creating second window in the lobby. Currently awaiting the cost of buildout and for glass for window installation. (Estimated completion date is February 20, 2017)
- Warwick Office: Discussed change with Division of Capital Asset Management and Maintenance (DCAMM) on December 14, 2017. Need implementation date from DCAMM.
- Pawtucket Office: On November 10, 2017, met with DCAMM to work with the owner about adding the second window. Need implementation date from DCAMM.

Also, the state has created a larger waiting room in Woonsocket. At the same time, the state is redesigning work space in the Woonsocket office to provide more room for ETs and client meeting areas.

Below is a draft of the Woonsocket lobby redesign.

DRAFT: THIS IS FOR DISCUSSION PROPOSE ONLY

4.3 Customers Not Served

FNS Inquiry:

Additional information regarding protocol for serving customers when they visit the office and not turning customers away without service.

State Response:

All issues outlined in this section by FNS have been reviewed by the state. We could not find any example of a client with an appointment being turned away by the state. The state has reinforced the enforcement of our policy prohibiting customers with an appointment being turned away by notifying all supervisors, reminding them that clients with appointments are to be seen on the day of the appointment.

There are times during the day when branch offices reach the limitation on appointments based on having a limited number of ETs. When the full inventory of appointments has been booked for a given day, no additional appointments are made for the remainder of the day. However, if the office works extend hours and completes its scheduled appointments for the day, then additional appointments are booked.

4.4 Lobby Tracking Tickets

FNS Inquiry:

Additional information regarding how lobby wait times are tracked and when a customer is issued a lobby ticket.

State Response:

The average wait time of SNAP clients is assessed regularly. This data assumes that a family on multiple programs is coming into the office to be served for SNAP even if they are checking on the status of additional programs (i.e. Medicaid, Child Care, etc.). The State tracks wait time from the point of arrival to a check-in station (either at the greeter stand or triage window, depending upon the issue or concern). At which point, a ticket is issued. All clients are required to proceed to security before reaching the ticket booth, limiting our ability to track clients before this point. Please note that given activation of the interim inclement weather plan, customers are brought into the lobby area to await interaction with the greeter in relative comfort rather than engaging them immediately after the security checkpoint.

We are currently using the best means available of tracking, including the same tracking methodology used at other state offices such as the Division of Motor Vehicles. At no state department that serves the public do we track wait times outside the physical

building or when people arrive and queue outdoors before our offices officially open for the day. We look forward to any suggestions that you may have in helping us better track wait times in our offices.

With regard to ticket issuance, the State has established a structure in the Providence office to quickly assess a customer's need to transition to the waiting area versus those tasks for which a customer can enter, quickly conduct their business (e.g., request and obtain a verification letter) and then exit.

In Lobby – Ticket Issued	In Lobby – No Ticket
Appointment	Future Appointment (scheduling)
Rhode Island Works (Walk in)	EBT Replacement
GPA (Walk in)	Triage (if presenting issue can be resolved timely)
Expedited SNAP Social Case Worker Appointment (Same Day)	Drop – Scan/Copy
(At Triage – If complicated case and room available for appointment)	SNAP Screening
Emergency - Losing Benefits (within 48 hours)	Self Service Portal
Emergency - Domestic Violence	Letters, documentation, and other verification correspondence
Emergency - 10+ Visits to Lobby	Status Inquiry
Emergency - Case Pending 30+ days	Changes

4.5 Extended Lobby Hours

FNS Inquiry:

Additional information regarding extended office hours including how long the extended hours are planned to remain in place.

State Response:

The state has currently provided extra lobby hours at the following branches and times to provide additional access for clients:

Saturdays 8:30 am- 12:30 pm

1. Providence office
2. Woonsocket Office
3. Pawtucket Office
4. Warwick Office

Weekdays (Tuesday and Wednesday) 4:30 pm to 6:30 pm

1. Woonsocket
2. Providence

In addition, the State consistently provides overtime opportunities for staff to complete non-lobby tasks and reduce the overall backlog of pending applications and recertifications. Although the UHIP leadership team is certain that significant overtime will be available for the foreseeable future, we are evaluating the appropriate balance between lobby and non-lobby hours that are needed to improve customer service overall. The expectation is that overtime for opening the lobby to the public on Saturdays will be scaled back in the month of February but that the same level of overtime effort will be retained to target non-lobby application processing.

4.6 Special Procedures to Assist Elderly or Disabled Customers

The state is committed to complying with the American with Disabilities Act (ADA) for our customers who need special accommodations. In order to communicate this to our customers in the field offices, signage is posted in all six of our field offices with the following language: "The Department of Human Services is pleased to provide assistance to our customers who may require special accommodations. Please inform our lobby greeters if you require assistance."

Section 5: Call Center

5.1 Call Center Staffing and Training

FNS Inquiry:

Information regarding additional ETs allocated to the Call Center and additional training provided to those staff.

State Response:

All calls to DHS enter through 1-855-MY-RIDHS. Callers are offered the option upfront to enter the IVR and follow automated prompts to obtain information on application status, EBT balances, etc. If a customer chooses to talk with a representative rather than entering the IVR, they are routed to a triage team. The triage team asks simple

questions about what the customer is calling about and forward the calls into queues in the Call Center software where the DHS Call Center Eligibility Technician (CCET) who are State Merit staff, are able to work the customer's issues end-to-end. This triage team acts as a switchboard operator and has helped DHS resolve calls that were previously being misdirected. Customers are warm transferred into the correct queues where DHS CC ET's skills are matched to allow for first contact resolution of issues.

The Call Center includes both a Tier-1 and Tier-2 staffing structure currently comprised of thirty (30) DHS State staff. Twenty-three (23) CCETs are assigned to Tier-1 with the primary responsibility of addressing customer calls/concerns from end-to-end. Seven (7) DHS State staff, four (4) Senior Eligibly Technicians and three (3) Human Services, Policy and Systems Specialists, are assigned to Tier-2 with the primary responsibility to work cases that are escalated from Tier-1, DHS Field offices and External Referrals requiring enhanced skills to research and resolve the customers' concerns. Our Tier-2 team works closely with our technology vendor on filing JIRA tickets and ongoing problem management for each case referred and monitors the case to resolution.

Through a partnership with HSRI, DHS is actively working to put together guidelines for the staff on calls they can expect to handle, estimates on call processing and after work time. This will help give the staff more information and clarity on what they should work, what they may need to hand off to Tier 2, or for a system fix, etc. Call Center staff were pulled together without the benefit of call volume data or handle time requirements with the launch of RI Bridges. Now that DHS has had the opportunity to experience the Worker Portal, as well as its limitations and impact on customer service, we are better able to understand staffing needs.

Call Center staffing levels are currently being evaluated and additional hiring is expected. Potential staffing increases are being considered against productivity metrics and service levels in other call centers in the State (HSRI and DLT), as well as current service levels (such as average handle time) in the DHS call center.

Included in DHS' consideration for adding staff to the call center is a proposal to include team leads for coaching and dedicating a policy analyst and training manager for ongoing interactive training opportunities. Currently, ongoing training is conducted during staff huddles where system and policy issues are identified, reviewed and clarified daily led by the Tier-1 and Tier-2 supervisors as well as DHS' Associate Director of Policy. Call center staff also receive coaching and "on the job" training from Tier 2 staff to work through issues encountered while on the phone with customers.

5.2 Call Center Task Completion

FNS Inquiry:

In the revised CAP, please provide an update on tasks designated for

completion by December 19.

Improvement	
Leverage unused telecom capabilities in the existing solution.	Complete
Improve operations by co-locating staff in one dedicated area of the Providence field office.	Complete
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	Ongoing
Secure HSRI's customer relationship management (CRM) for use by all front line and Tier Two staff	January 31

Please provide data reflecting the current callback turnaround time for calls

received in the call center.

The callback option was launched as a means to mitigate long customer wait times at the DHS call center. We have learned that this is an ineffective strategy with current staffing levels due the fact that only 30% of callbacks are completed. This is in part due to difficulty in reaching customers. As a result, repeat callers to the call center have increased and requests for callbacks have backed up, resulting in longer turnaround times. Due to these concerns, we have elected to disable the callback feature and allow the call center staff to focus on servicing the customer when they call in to DHS.

See below for a graph with call back data.

DHS Call Center Dashboard - July 1, 2016 through January 21, 2017

	01-Jul-16		01-Aug-16		01-Sep-16		01-Oct-16		01-Nov-16		01-Dec-16		01-Jan-17	
Total Calls	17,806	100%	26,114	100%	41,359	100%	40,262	100%	38,242	100%	35,929	100%	24,141	100%
Handled by Agent	16.4%		9.7%		3.1%		10.5%		11.0%		17.1%		25.3%	
DHS Agent	2,919	16.4%	2,546	9.7%	1,289	3.1%	4,225	10.5%	4,208	11.0%	5,343	14.9%	3,124	12.9%
Triage Agent											796	2.2%	2,994	12.4%
Prompt	6,056	34.0%	8,564	32.8%	15,035	36.4%	19,192	47.7%	16,603	43.4%	12,146	33.8%	7,122	29.5%
Callback	3,616	20.3%	6,541	25.0%	11,216	27.1%	2,698	6.7%	4,970	13.0%	4,584	12.8%	4,100	17.0%
Abandon	5,215	29.3%	8,463	32.4%	13,819	33.4%	14,147	35.1%	12,461	32.6%	13,060	36.3%	6,801	28.2%
Avg. Abandon	0:08:30		0:10:30		0:16:30		0:25:30		0:18:30		0:24:30		0:37:30	
Avg. Wait Time	0:15:00		0:22:16		0:28:06		0:43:25		0:41:15		0:52:42		1:27:46	
Avg. Talk Time	0:06:53		0:06:49		0:05:46		0:08:59		0:10:13		0:09:38		0:10:37	

5.4 Call Center Tracking

FNS Inquiry:

Additional information regarding tracking calls including the purpose of the call and whether the call resulted in problem resolution and whether call tracking is useful to determine systemic or widespread issues, whether call center services are effective and if further training is needed for call center staff. Additional information about the results of current call tracking if available.

State Response:

We are committed to securing use of the CRM for both Tier-1 and Tier-2 staff by January 31, 2017 with the expectation to train staff and have all incoming calls and customer interactions tracked through the CRM by February 17, 2017.

We are manually tracking most common call types by engaging staff in a daily huddle, in an effort to better understand how we can best set up our resources and service our customers. For example, we know that our most common call is regarding SNAP; more specifically customers calling to check the status of their application, obtain benefit information, change an address or request a new card.

The CRM will enable the staff to record the reason for the customer call.

Below is a sample CRM report from HSRI. We are obtaining similar features and capacity for the DHS call center CRM.

Data as of: 10/17/16

Escalations from:
10/10/16 - 10/14/16

Tier 2 Open Escalation Types		OPENED THIS PERIOD	CLOSED THIS PERIOD	TRANSFERS THIS PERIOD	NET THIS PERIOD	TOTAL WAITING FOR HELP DESK REVIEW	TOTAL CURRENTLY OPEN IN TIER 2 QUEUE
Escalations	1095 A	4	0	0	4	3	1
	Appeal Related	20	22	0	-2	0	13
	Billing & Payment	39	14	0	25	3	38
	Eligibility Issue	50	15	5	30	2	70
	Enrollment Issue	80	34	2	44	3	183
	Incorrect APTC	71	28	0	43	4	189
	Incorrect Plan Rate	0	3	0	-3	0	0
	Other	22	6	0	16	2	16
	System Issue	268	143	3	122	17	518
	System Out Of Sync	39	15	5	19	4	36
	Total	593	280	15	298	38	1064
Tasks	ACH Reversals	0	0	0	0	0	0
	Refund	52	56	0	-4	9	79
	SEP Task	27	29	0	-2	4	33
	Suspense Research	0	2	0	-2	0	5
	Verification Task	38	29	12	-3	0	122
	Total Tasks	117	116	12	-11	13	239
	Total of Escalations + Tasks	710	396	27	287	51	1303

Age of Open Tasks

Priority Level	1-14 Days	15-21 Days	22-30 Days	>30 Days	>60 Days	>90 Days	Total
L1A	372	24	18	19	6	0	439
L1B	141	44	27	70	13	1	296
L2	77	9	13	22	5	1	127
L3	299	30	38	47	21	4	439
Total Escalations	889	107	96	158	45	6	1301
Percentile	68.33%	8.22%	7.38%	12.14%	3.46%	0.46%	

Closed Tasks (since 4/3/16)

Priority Level	Avg Days to Close	Total Closed	Closed within KPI	Closed outside KPI	% to Goal	Max KPI Limit	Closed since	
L1A	4	3292	3062	230	93%	14	12/1/15	3248
L1B	12	1293	946	347	73%	14	4/3/2016	9691
L2	20	740	529	211	71%	21	Total Closed	12939
L3	17	4366	3684	682	84%	30		
Total Closed		9691	8221	1470	83%			

Pending Escalation Status

New	734
Pending Deloitte	450
Pending Other	36
Pending Carrier	33
Researching	23
Pending NFP	12
Ticket Resolved	11
Pending HSRI Recon	2
Pending HSRI Policy	1

SECTION 6: Accurate and Timely Notices

Section 6: Provide accurate and timely notices

A notices Quality Control team, comprised of DHS policy staff, legal counsel, program administrators as well as vendor technical team members, continues to meet regularly to review all notices being generated by the new RIBridges system. The team has successfully reviewed all of the system-generated notices, and has started to review the user-generated notices. The team identifies notice issues that could contribute to program access barriers for customers, case errors, or other violations. Additionally, the team provides grammatical, stylistic, and content edits which are being incorporated into each new notice generation. All identified issues are tracked per notice type and, if

needing a system technical correction, with an issue ticket. Any issues identified as mailing blockers and needing an immediate resolution, are addressed immediately, and the notices are not mailed out to the customers until the issue is resolved. When the vendor has fixed the identified issue, the notices are regenerated and a subset is provided to the QC notice team for review and approval. In limited instances, interim business processes for manual notice generation are used while permanent fixes are being implemented. This ensures that customers continue to receive proper and timely notifications. All notices must be approved for mailing by policy, legal, and program administrator.

As of December 2, 2017, 120 notice corrections have been made to improve the information being shared with households. Of these notice corrections, 36 were categorized as "blockers" which would fall into the categories of access barriers to clients, case errors, or disclosure of recipient information as defined by FNS.

Currently, there are three notices that have partial blocker issues – DHS 1605 Benefit Decision Notice (BDN), the DHS 1010 Renewal Notice and the DHS 1046 Six-Month Interim Report. The DHS 1605 BDN has blocker issues stemming from the Medicaid eligibility determination language in the notice. The EOHHS QC Notice team has not released this notice for mailing because they have concerns about the accuracy of the EOHHS program decision included in the notices. It is impacting DHS programs, such as SNAP, in that combined Benefit Decision Notices (BDN that contains both a DHS program decision and an EOHHS program decision) are not being mailed. The interim process to resolve this issue involves the separation of the DHS decision from the EOHHS decision, so that the notice can be mailed out with just the DHS decision. There are approximately 1300 SNAP notices that have been impacted by this issue since September 13, 2016. These BDNs are scheduled to be mailed with just the DHS program decision by mid-February 2017.

The DHS 1046 Six-Month Interim Report has a blocker issue that was identified within the subset of February examples provided for QC review in January. Information of individuals who are not requesting benefits within the SNAP household appeared in the examples provided for QC review. The vendor is working on correcting the system logic to properly exclude information of individuals who are not requesting benefits. If a permanent solution is not programmed by February 7, 2017, the DHS 1046 will not be mailed out to households that include non-requesting individuals and/or the form mailed to these households will be blank.

In addition, the State and its vendor have corrected the design change identified in the DHS 1010 which had the potential of containing information from other households. The DHS 1010 form is no longer pre-populated with all case related information for a household in order to protect household member information from disclosure to others on the notice. The DHS 1010 now includes blank fields to allow members to fill in the data specific to their recertification. The unpopulated DHS 1010s will continue to be

utilized until a permanent system solution is implemented to properly exclude individuals not requesting benefits in the case.

The State continues to perform a robust QC on all notices going out of the system and addresses issues as they come up. To ensure that the QC notice team reviews an accurate subset sample of notices going out, the program administrators now request samples of specific household compositions and case specifics. This ensures that the samples provided include a wide variety of case specifics and minimizing the risk of potential issues not being reviewed/addressed before notice mailing. Additional information on the QC process is outlined below:

Issue Title	Root cause and Corrective Plan	Target Resolution Date
Quality Control process is not always executed timely **(Process)**	Notices are initially held in the system before being printed and mailed for Deloitte and the State to perform a quality control (QC) check. When concerns or questions come up, it has sometimes taken weeks to get direction on the next steps which has led to some customers receiving notices late. **Corrective Plan**: A monthly Notice Calendar is used to determine QC priorities ahead of mailing deadlines. Additionally, Negative Action, Interim and Renewal notices are dry-run in the test environment to facilitate QC ahead of production execution	Most notices are QC approved now.
Remove non-requesting individuals from interim notices**.**	Household members not requesting benefits are currently included on the SNAP interim notices but were requested to be removed. **Corrective Plan**: Definition of what constitutes a Household was verified.	2/7
Incorrect or Outdated Client Address **(Under review)**	Notices are being returned due to incorrect or outdated addresses being entered by customers. **Corrective Plan:** Still identifying root cause (data conversion or data entry) and impact; action plan and timeline to be determined.	TBD

6.2 Notices Contain Only Information Authorized

As mentioned in section 6.1, the correction to the blocking issue regarding client household information on the recertification notice has been resolved through a temporary solution. For DHS 1010 notices generated in September for October recertification, the legacy system was leveraged prior to the launch of RI Bridges to send these notices to clients. As you will see in the table below, RIBridges did generate over 6600 recertifications in October for households whose recertification period ended

in November. These notices went through the QC process described above, with two issues identified and corrected prior to sending these recertifications. The system generated over 8200 recertification in November for households whose recertification period ended in December. The subset sample provided for QC review revealed potential issues with personally identifiable information appearing in the notice for non-requesting individuals. The inclusion of non-custodial parent (NCP) information and the display of expense related information for all members of the household was identified and corrected by making this information blank prior to sending these notices to clients. This identification and correction led to the November decision to remove pre-populated information in the recertification forms to mitigate the potential that other household information would be shared.

The table below provides generation, approval, and mailing details of the renewal notices, including the latest January and February metrics. Currently the DHS-1010 renewal packet is a combined notice for all programs including Medicaid. As requested by FNS, this notice no longer includes client data to protect PII.

Month	Eligibility End date	Form Number	Form Description	Number of notices	Generation Date	Approval Date	Mail Date
Sep	10/31/2016	DHS1046	Six-month Interim	5768	9/20/2016	9/30/2016	10/1/2016
		DHS1010	Renewal Notice	6661	10/1/2016	10/14/2016	10/21/2016
Oct	11/30/2016	DHS1046	Six-month Interim	6552	10/21/2016	11/1/2016	11/3/2016
		DHS1010	Renewal Notice	2424 (B1) 5785 (B2)	11/1/2016 (B1) 11/29/2016 (B2)	11/23/2016(B1) 11/30/2016 (B2)	11/25/2016 (B1) 12/2/2016 (B2)
Nov	12/31/2016	DHS1046	Six-month Interim	6501	12/6/2016	12/2/2016	12/8/2016
		DHS1010	Renewal Notice	550 (B1) 3745 (B2) 1815 (B3)	12/12/2016	12/7/2016	12/8/2016 (B1) 12/14/2016 (B2) 12/21/2016(B3)
Dec	1/31/2017	DHS1046	Six-month Interim	6139	12/21/2016	12/7/2016	12/28/2016
		DHS1010	Renewal Notice	5740 (B1) 648(B2)	1/5/2017 (B1) 1/10/2017(B2)	1/6/2017 (B1) 1/8/2017 (B2)	1/6/2017 (B1) 1/11/2017(B2)
Jan	2/28/2017	DHS1046	Six-month Interim	5748	1/8/2017	12/7/2017	1/10/2017

Section 7: Access to Interpreters and Translated Materials

Per FNS, no reply is needed for this section.

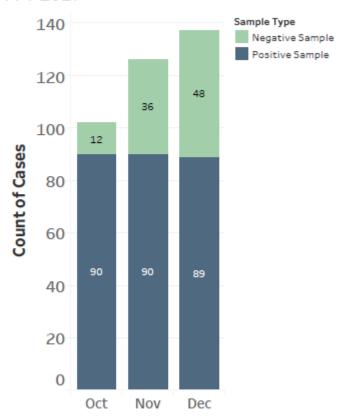## Section 8: Ensure Quality Control Process and Program Measures

8.1 QC Samples

FNS Inquiry:

The State must address Federal regulatory requirements for complete QC sampling including a detailed analysis of what the issues for QC are, the proposed resolutions and the timeliness for coming into compliance with regulation.

State Response:

Complete negative and positive QC samples has been pulled from RIBridges. All previously identified issues with these data pulls have been resolved. Below, please find a graph of the sample cases drawn from each frame for each of the last three months. A list of the samples cases drawn each month will be provided with the State's weekly data submission.

Quality Control Samples - FFY 2017

Sample Type
- Negative Sample
- Positive Sample

Count of Cases

Month	Negative Sample	Positive Sample
Oct	12	90
Nov	36	90
Dec	48	89

8.2 Interface Schedule*

FNS Inquiry:

Additional information regarding interfaces including National Directory of New Hires (NDNH) and other interfaces.

State Response:

The NDNH interface is currently in testing. Northrop Grumman and Department of Human Services plan to end testing on February 7, 2017 and submit user acceptance test results to FNS by February 8, 2017. Pending FNS approval, NDNH will deploy to production on February 18, 2017.

FNS TOP still requires scripts to be written in addition to testing. Northrop Grumman and DHS are scheduled to begin user acceptance testing on February 28, after NDNH is successfully deployed and TOP testing scripts are complete. Testing is slated to take

approximately five (5) weeks, ending on April 4, 2017. Pending FNS' approval of the FNSTOP test results, which will be sent by April 5, 2017, Rhode Island will deploy FNSTOP to production on April 15, 2017.

The overall interface production schedule was reevaluated by the State, Northrop Grumman and Deloitte since the initial Corrective Action Plan was submitted on November 22, 2016. **The revised schedule is included in Section 9. This schedule is dependent on FNS and CMS approval of the additional Northrop Grumman contract amendment.** The current schedule is at risk without the approval of the contract extension.

Once the Northrop Grumman resources are on board, there will be a short window to onboard the team, approximately three (3) days. Northrop Grumman plans to onboard employees previously part of the Rhode Island InRhodes system and the conversion to the RIBridges system to avoid further delays.

Please note, the current release schedule allows for Saturday deployments. The schedule below is based on that schedule.

SECTION 9: Deferred Functionality Timeline

Deferred Functionality

	Title	Description	Impacted Programs	Target Implementation	Status
1	SSA SOLQi	Add interface with trading partner	All programs	January 21, 2017	Complete
2	FNS electronic disqualification eDRS	Add interface with trading partner*	SNAP	February 11, 2017	In Progress
3	National Directory of New Hires (NDNH)	Add interface with trading partner*	All Programs	February 18, 2017	In Progress
4	DLT Work Opportunity Tax Credit	Add interface with trading partner*	RIWorks	February 18, 2017	In Progress
5	Medicaid 1095B Implementation	Integrate Medicaid 1095-B forms and associated admin functionality	Medicaid	February 2017	In Progress

		into RIBridges			
6	SSA Death Match	Add interface with trading partner	All Programs	March 2017	State Assessment
7	Public Assistance Reporting Information System (PARIS)	Add interface with trading partner*	Medicaid, TANF, Worker's Compensation, Child Care, SNAP	March 25, 2017	State testing has not started
9	Disaster SNAP - Part 2 (QC and program denial)	Integrate DSNAP program denial and QC functionality into RI Bridges	SNAP	March 2017	In Progress
9	FNS TOP	Add Interface with trading partner*	All Programs	April 15, 2017	State testing has not started
10	90-day QHP Verification Batch	The 90-day QHP verification batch analyzes outstanding verifications for QHP recipients and takes the necessary action *Does not include IRS income verification	Exchange	April 2017	In Progress
11	Passive renewals for Medicaid	Implement Medicaid passive renewal functionality	Medical	April 2017	In Progress

		into RI Bridges.			
12	Federal Immigration Verification (USCIS)	Add interface with trading partner*	All programs	May 20, 2017	State testing has not started
13	DLT (Remaining Interfaces)	Add interfaces with trading partner*	All Programs	May 27, 2017	State testing has not started
14	Stellarware new hire match	Add interface with trading partner*	All Programs	May 27, 2017	State testing has not started
15	Race to the Top Program	Add interface with trading partner*	All Programs	May 27, 2017	State testing has not started
16	Spanish/Portuguese notice translations for key notices	Implement functionality to generate and send priority notices in Spanish and Portuguese from RI Bridges.	All DHS Programs	May 2017	In Progress
17	New correspondences	Such as: - Bill for School Hours - Age Exemption Request Form - Change to School Age Eligibility - Earned Income Tax Credit - Month Counted against time	All Programs	May 2017	In Progress

		limit - No Pay Notice - Month Counted against time limit - Out of State Notice - School Lunch Direct Certification Letter - Traditional School Lunch Letter - Bike Helmet			
18	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
19	Kiosks for local office lobby	Implement Kiosks for check-	All Programs	May 2017	In Progress

		in/check-out with ticket printing and other functionality			
20	FRED/Fraud (fraud investigation tracking)	Integrate end-to-end FRED/Fraud functionality into RI Bridges	All Programs	May 2017	In Progress
21	Division of Tax	Add interface with trading partner*	All Programs	June 3, 2017	State testing has not started
22	CMS Medicare Buy In	Add Interface with trading partner*	Medicaid	June 3, 2017	Work around operating in production
23	SSA Prisoner Match**	Add interface with trading partner*	All Programs	July 1, 2017	State testing has not started
24	APTC override functionality	Fix APTC override functionality in RI Bridges	HSRI	TBD – Needs to align with additional scope currently in the change control process.	Not Started

*This schedule is based on approval of the Northrop Grumman contract amendment to add seven additional resources. Interface timelines are at risk. If resources are not onsite the first week of February, Rhode Island will need to modify some of the interface timelines.

** On December 23, 2016, the State and SSA agreed to defer the SSA Prisoner Match to July 1, 2017.

Functionality related to the restaurant meals indicator focuses on three specific areas:

1) Is the functionality available to determine eligibility for a client?
   a. The functionality exists within RI Bridges to determine eligibility for a client based upon the DHS policy of:

      1. **Homeless:** When all members of the household have
         - living arrangement type is Homeless
         - living arrangement type is Homeless Shelter

- living arrangement type is Halfway house

2. **Disability**
   - the person is receiving RSDI,SSI, SSA or MA based on disability or blindness
   - the person receives benefit from Railroad retirement and the person's disability confirms to SSA standards

3. **Senior/Elderly**
   - When the head of household's age in years is greater than or equal to 60.

2) Is the information being sent to FIS?
   a. DHS is working with the vendor and FIS to ensure that the appropriate files are being shared between the two systems daily so that households deemed eligible for the restaurant meals program since the launch of the new eligibility system have their EBT card coded correctly. Households who have been found eligible for restaurant meals program prior to the new system launch has retained the proper coding on their EBT cards allowing them to utilize their cards at the 10 participating restaurants.

3) Does the client receive notification of their eligibility in the program?
   a. The current Benefit Decision Notice (BDN) will require an update to notify the client of their inclusion in the restaurant meals program. At this time, the BDN does not include any notification about inclusion in the restaurant meals program. An update to the BDN to include the appropriate language is scheduled to be implemented by February 24th. The State is also working on a manual notice to send to clients who have been determined eligible for this program since the launch of the new eligibility system but have not received any previous notification regarding their eligibility into the program. The anticipated mailing date for this notice is February 27, 2017.

State Treasury Offset and Treasury Offset Program interfaces are scheduled to go live in May 2017.

Section 10: Issues Not Documented in the CAP

Misapplication of non-citizen sponsorship policy resulting in the exclusion of eligible children

This issue has been investigated by analyzing JIRA tickets and following up with field staff. After a diligent search DHS has not found system issues in regards to the non-citizen sponsorship policy resulting in exclusion of eligible children.

Issues with receipt of LIHEAP in October and/or September

This issue has been investigated. The investigation revealed that the LIHEAP benefit was not coded as a cash benefit, thus preventing customers from utilizing the benefit. The issue was resolved with the vendor on November 5, 2016, when the code for the LIHEAP benefit was updated to reflect is as a cash benefit. The interim process has included the EBT coordinator turning on the cash benefit flag for the LIHEAP benefit on a case by case basis directly in the FIS system. We have discovered that this issue affected 254 cases. The estimated dollar amount of issuances that were not immediately available to customers is $5,082.54. These payments have been made to customers on January 6, 2017, and the issue has been resolved.

FY 2017 income guidelines and other COLAs and standards not adjusted timely.

This issue has been investigated. The investigation revealed that for applications received between October 1, 2016 and approximately October 13, 2016, the FY 2017 income guidelines had not been programmed. All other COLAs and standards adjustment were programmed into all cases as of October 1, 2016. The issue was resolved with a system fix on October 29, 2016 and the correct FY 2017 income guidelines have been updated into all the affected cases. This issue affected 71 cases and has been resolved. It did not impact any dollars that were supposed to go to customers.

No minimum benefit issues for 1-2 person categorically eligible households; instead, these households are denied for failure to pass the net income test.

Our investigation into this issue revealed that 1-2 person households who were categorically eligible for SNAP were incorrectly being denied benefits for failure to pass the net income test. This issue affected 1,503 cases and the estimated dollar amount of issuances that were not immediately available to customers is $24,048. The issue has been resolved with our vendor, who put into place a system-wide code fix on November 13. The resolution process also included identifying all impacted cases, rerunning their eligibility and issuing the correct benefit amounts. The entire process was completed on November 30, 2016 through the nightly batch run.

Section 10.2 – Recoupment

Functionality Issues Addressed

During a site visit in November, FNS staff identified client overpayments and claims that may or may not be valid debts, which resulted in recoupments that occurred in the month of November. Additionally, we are concerned with the overpayment interface between InRhodes and RIBridges and the accuracy of claims and claim types that

reside in RIBridges. FNS is aware that the Claims Unit located at the Providence Office has the sole responsibility of establishing overpayments and also ensures due process is in place by issuing the debtor a demand letter, as required by Federal regulations. It appears that recent overpayments developed were not initiated, calculated and verified by the Claims Unit and demand letters can't be located for some cases, or in some cases are inadequate.

Additionally, access to RIBridges was only recently granted to the Claims Unit and no training in developing overpayments has taken place for Claims staff. On November 29 FNS informed the State via e-mail that further claims development and collection for such claims must stop until the Department has assessed the claims development activity. The State responded that it would comply.

FNS also required the State to provide Issue Resolution

State Response:

The end-to-end process of claim referral, establishment, and recoupment is operational in RIBridges. Eligibility technicians can refer overpayments to CCRU staff who can research and establish the claim to trigger a demand letter. Recoupment logic is built into the system for collection across prioritized benefit structure. Staff can also post payments and edit existing claims as needed in RIBridges and are able to utilize an expungement process where un-used benefits are removed from the EBT card.

As noted in the FNS inquiry, there were previously identified issues which have now been addressed. In the first, pending claims data in InRhodes was converted as established claims in RI Bridges which resulted in incorrect collections activity.

Total Claims Converted from InRhodes	Count of Claims Successfully Converted	Count of Claims in Error
37,288	27,307	9,981

For each Claim in Error, the claim status was changed from 'Established' to 'Pending'. For those errors resulting in incorrect recoupment, clients were issued a supplemental benefit amount. In addition, the outstanding balance of the claim was reverted back to the original outstanding balance. Once the above data fix was applied, all pending claims were reconciled with legacy data. The CCRU was advised of the correction and performed several spot checks to verify results.

The second issue was also related to data conversion. In this instance, established claims from InRhodes were incorrectly mapped between 'Household Error' and "Agency Error'. This impacted all 37,228 claims converted; a data fix applied on December 16, 2016 corrected the issue for each claim.

The third issue identified involved demand letters, previously generated by InRhodes. After Go-Live, the first batch of letters was generated on October 12, 2016 and placed

into a Quality Control status for review. As part of the process, these were available for examination in the system but were not printed while the quality control process was underway. During this time, State and vendor teams analyzed each demand letter for accuracy, specifically benefit period values, customer name and claim amount. The second and final code fix was deployed on January 26, 2017. The State is now able to establish claims and generate demand letters using RI Bridges.

Training

A six-hour training was initially conducted on June 2, 2016 for fifteen (15) State personnel, including the following CCRU staff, prior to go-live. Additional training of CCRU staff was provided on January 18.

Both trainings were designed to provide staff with an understanding of RI Bridges functionality and the steps required to perform the benefit recovery process, including claim establishment and recoupment. Trainees were introduced to RI Bridges functionality and supports such as system dashboard, system help, case notes, and system messages. Instructors provided review of process documentation for establishing and processing claims before demonstrating this in the system. Participants were then provided a structured working session to practice claims work with instructors. This was supplemented with hand-outs such as a quick reference guide. A student guide was also created to support ongoing learning for this functionality. Unit personnel continue to learn the system.

The end-to-end process of claim referral, establishment, and recoupment is operational in RIBridges. Eligibility technicians can refer overpayments to CCRU staff who can research and establish the claim to trigger a demand letter. Recoupment logic is built into the system for collection across prioritized benefit structure. Staff can also post payments and edit existing claims as needed in RIBridges and are able to utilize an expungement process where un-used benefits are removed from the EBT card.

Also, state Treasury Offset and Treasury Offset Program interfaces are scheduled to go live in May 2017.

As noted in the FNS inquiry, there were previously identified issues which have now been addressed. In the first, pending claims data in InRhodes was converted as established claims in RI Bridges which resulted in incorrect collections activity.

Section 10.3 Technical Issues with Root Cause, Resolution and Current Status

State Response:

Multiple duplicate accounts

Background and root cause: Cases with multiple EBT accounts have been found. The reason for the multiple accounts have been identified as follows:

A household had been receiving SNAP benefits in the legacy system and the case was closed in the legacy system. However, they remain active on Medicaid. When the family reapplies for SNAP benefits in RIBridges, DHS reopens the SNAP case under the active Medicaid case, and not the closed SNAP case. Due to this, another FIS account is created under the Medicaid case in which SNAP is added/reopened. This resulted in two FIS EBT accounts for the same household. However, the original SNAP case remains closed and FIS does not add new money onto a closed case's EBT account.

Current Status: No system fix is required as sometimes two EBT accounts may be needed, such as in instances of domestic violence or divorce/separation. However, the system has been updated to alert users to associate new applications to an already established case for the individual. Reconciliation of multiple EBT accounts was completed in December, and each RIBridges case was adjusted to reflect one active EBT account with the appropriate benefit amount. All inactive EBT accounts will automatically be removed following the expungement rules. Additionally, as a long-term resolution, RIBridges and FIS will be modified in the next six (6) to eight (8) months, to manage a single EBT account for each customer regardless of case. Accounts will be identified by individual number rather than case number. The case number is a newly generated number at the time of new case creation, thus it does not allow FIS to recognize a duplicate EBT account creation. Having the EBT account match an individual number, will prevent duplication of EBT accounts.

Benefits inconsistently applied to duplicate accounts

Background and root cause: As part of conversion, FIS had sent a list of all active accounts. Some customers had two active accounts in FIS prior to conversion. Information for both accounts was populated in RIBridges for the one active case as they are related to the same client. Therefore, each time the monthly benefit issuance batch ran, the system randomly selected one of the accounts to deposit the money into leading to inconsistency. This issue impacted approximately 25 cases.

Current Status: Resolved in October 2016

Fix: In October, data corrections were applied to the converted cases to remove the accounts with the lower amount of benefits and transfer the information to the account with the higher balance. This resulted in only one account being populated in RIBridges and thus every payment made thereafter was consistently applied to one account. The application of this data correction applied to all legacy data so this issue no longer occurs. For the new accounts that are created in RIBridges, the system has the capability to not allow the creation of second account in FIS.

Over issuances

Background and Root Cause: An investigation into this issue revealed that over issuances were present in cases where manual benefit issuances were done. This

occurred because staff performed manual issuances of benefits without first verifying that a client already received benefits. Upon reconciling all SNAP issuances in FIS, it was found that some cases received multiple payments.

Resolution: A daily FIS data reconciliation process has been implemented which identifies cases that have duplicate issuances due to erroneous manual issuances or system malfunctions. After an initial data clean up by the State, the volume of cases identified has been reduced to less than one (1) case per week.

Current Status: Daily data reconciliation process put in place on October 24, 2016

Multiple duplicate issuances to same accounts

Background and Root Cause: One converted SNAP household had a payee address that did not comply with RIBridges address standards, which resulted in a continuous overpayment of SNAP benefits. RIBridges was throwing a data anomaly error, yet the retry mechanism was retrying the transactions. It was discovered that data was actually being sent to FIS for each transactions tried. This resulted in multiple deposits to the same account. This issue impacted one SNAP account.

Resolution: The over issuance amount was cancelled through the EBT Terminal for the impacted case. A daily reconciliation process has been established to monitor over issuances and under issuances.

Current Status: Resolved on November 20, 2016

Case not found in FIS

Background and Root Cause: At the time of conversion, FIS active and closed account information was populated in RIBridges. In some cases, individuals with closed accounts applied for SNAP benefits. DHS re-opened the closed case and processed the application. However, when DHS attempted to search for this account in FIS, they got an error message saying "no exact match can be found" because the account had expired in FIS. The expired account needed to be deleted and a new one created

Resolution: Administrative function is in place to update account status in RIBridges for such accounts. Long-term system modification is required to receive the feed file from FIS, whenever the account status is updated.

Current Status:

Process Workaround: When the DHS staff receives a rejection from FIS, DHS should establish a new EBT account for that case.

Future State: We will establish an active daily file update feed from FIS to RIBridges. This is scheduled to be implemented by May 2017.

Incorrect benefit type codes

Background and Root Cause: Each time SNAP benefits are sent from RIBridges to FIS, they are sent with a certain benefit type code which is used to distinguish the kind of SNAP benefits a customer is receiving. For instance, SNAP benefits that are issued by monthly batches have a code of "FPA1", whereas SNAP benefits that are issued as supplements by the daily batch have a code of "FPA4". This issue of using incorrect benefit type codes in the transmission of date from RI Bridges to FIS does not limit the customer from accessing their benefits.

Resolution: A change was made to the system so that every time a benefit issuance is sent to FIS, the correct benefit type code is sent.

Current Status: Resolved on December 16th, 2016

Damaged card status not updating in RIBridges

Background and Root Cause: The damaged card status is a status that is utilized by FIS for other states. It is not a status that is used by RI, and is not recognized by RI Bridges. FIS had chosen this card status for a handful of EBT card replacement requests, preventing the card to be reissued through RI Bridges as the damaged card status is not recognized by the system.

Resolution: DHS has asked FIS to remind its customer service representatives not to use this status for RI customers who are calling them directly with requests for EBT card replacement. The appropriate card statuses assigned to RI will be used.

Current Status: It does not appear that a system resolution required.

Unable to remove card from BI_EBT_CARD table

Background and Root Cause: RIBridges has the ability to remove an account as an administrative function but not as a user function. FIS automatically deactivates the customer account if there is no activity for the period of twelve (12) months. During conversion, these accounts were provided by FIS as active accounts. However, they are subsequently deactivated at FIS end and no further communication was sent to RIBridges system regarding this deactivated account. Therefore, when a client came in to request a new EBT card because theirs card was lost, workers would get an edit message indicating inconsistent card information between FIS and RIBridges.

Resolution: Interim process for this situation was to move the card information from the EBT card table into an audit table so that the card number generated in FIS could be updated through interim process. Long term resolution requires changes to existing FIS design to send updates to RIBridges and RIBridges to consume these update transactions on a regular basis. An implementation of this solution is scheduled for May 2017.

Current Status: Administrative functionality to remove card from BI_EBT_CARD table remains in place.

Incorrect supplemental issuances

Background and root cause: This is a worker-initiated process error. In circumstances where eligibility is rerun and a new benefit amount is calculated, workers have been authorizing manual issuances without realizing that the system is automatically updating the benefit amount and issuing the supplemental benefit. DHS workers have issued duplicate supplements for 24 SNAP cases.

Resolution: To remedy these issues, further training will be provided to the field staff on data entry and processing eligibility.

Current Status: Ongoing training and monitoring, including a daily supplemental issuance report and daily reconciliation reports.

Garbled Demographic and Address data

Background and Root Cause: During Pilot implementation, PII and demographic information was garbled to ensure customer privacy and confidentiality. This garbled logic was kept in place. Masked demographic data and address data was being sent from RIBridges to FIS for converted cases. This was due to the masking logic kept in place to protect PII data for converted case for Pilot implementation.

Resolution: Software was modified to remove masking logic for production environment and all PII data (name) is corrected in FIS. Address is not a mandatory field for interfacing with FIS system, so address data is not required to be sent to FIS. However, this will reviewed and analyzed to ensure that consistent addresses are kept across FIS and RI Bridges.

Current Status: Resolved on October 3, 2016

A cleanup process required to be run for cases where availability date was set as 1/30/2016 to ensure that their benefits don't get expunged in advance. Additionally, a clean-up process must be run for any other availability dates that were back dated to first of the issuance month.

Background and Root Cause: During the initial days after go-live, the system issued the benefits with the incorrect availability date of 1/30/2016. The EBT system has an expungement process which looks for any inactivity within twelve months of the benefit availability date and expunges those benefits. Any case with a benefits availability date

of 1/30/2016 would be subject to expungement on 1/30/2017 if the benefits were not utilized and there was no account activity during the 12 month period.

Resolution: In November, a system fix was applied both in RIBridges and FIS to correct the availability date. The availability date was changed to the first of the month. To prevent incorrect expungement of benefits, FIS updated its expungement logic to prevent early, incorrect expungement. FIS now applies the later of the following dates – availability date or benefit applied date.

Current Status: Resolved by FIS in December 2016.

Section 10.4 Use of non-merit staff

State Response:

The State has affirmatively discontinued the use of any non-merit staff for SNAP case handling. As discussed more fully above the State has posted and is filling for new ETs in both limited term and permanent positions for a net increase of 44 ETs to assist in the timely processing of SNAP applications, both expedited and regular. At all times from January, 2017 forward the State certifies that only state merit staff are engaged in SNAP case handling.

Section 10.5 – Lack of Case Documentation

State Response:

The State is working to process recertifications, interims, and new applications with the appropriate documentation available for each case. In the initial weeks following the launch of RIBridges, issues with the system made it difficult to complete the end-to-end process of scanning, indexing, and validating that all necessary case documentation was available for workers to view within the RI Bridges. The vendor and the state have been working together on addressing operational and system issues, and are emphasizing the importance of placing a greater emphasis on using electronic documentation to process recertification during trainings.

Section 10.6 – Cases Authorized by "SNAPAdmin"

State Response:

All accounts associated with SNAPAdmin have been disabled as of January 28, 2017. The State understands the need to have auditable and traceable log-ins to monitor performance and make course corrections where required. In addition to affirmatively disabling all SNAPAdmin accounts, the State did a proactive sweep of all generic accounts created and any account not associated with an individual user's name. In accordance with this effort, the State disabled over 700 user accounts that were leveraged during UAT and Pilot phases, converted from the Health Insurance Exchange deployment, and that were used during the Pilot phase regardless of whether the ID had logged in since the launch of RI Bridges. A process is now in place to evaluate all user

accounts which have not logged in for 60 days to assess whether orphan accounts can be deactivated.

Please see attached for a memo that was distributed to all DHS staff on January 27, 2017 regarding this issue.

Section 11.1 – Data

State Response:

All data-related questions were resubmitted in the updated data fact sheet on January 27, 2017 and were discussed during the in-person FNS data consultation on January 17, 2017. Weekly reports are now being submitted to FNS with the data requested. In addition, data related to two referenced bullets are included below.

See below for the number of notices of expiration sent in October and November. Please note that the October number is lower due to the State's outreach plan of proactively reaching out to interview recipients up for redetermination during that timeframe.

November	2804
October	274

The total number of SNAP cases impacted by duplicate issuance was 24 cases. The total over issuance amount is $2204.75.

Baseline data from pre-conversion has already been supplied. Please let our data team know if there is any additional data that would be helpful to submit in support of these revisions to the Corrective Action Plan.