



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

February 9, 2018

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

**RE: RI FFY 2018 SNAP Management Evaluation Plan Update**

Dear Ms. Brathwaite:

In response to your letter dated December 26, 2017, below please find updates to the FFY 2018 Management Evaluation Review Plan.

**FY18 Target Areas:**

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

The state has one community that does not have an ABAWD Waiver: Richmond RI. This community is served primarily by the South County Regional Office. ABAWD tracking and policy compliance will be reviewed during the ME review of the South County Regional Family Center, which is scheduled for March 2018.

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

A review of the state's SNAP E&T vendor, Local Initiatives Support Corporation (LISC) will be conducted in June 2018. During the review, DHS will review the protocols being used by LISC in its subcontracting with providers of direct E&T components.

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

RI does not have a county shifting to a mandatory E&T program. RI will continue to operate a voluntary SNAP E&T program.

4. Program Access Review (PAR)

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

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

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

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

This review does not apply to RI because EBT cards issues for RI SNAP do not have photos.

#### **State At-Risk Areas:**

1. PAR at the State agency level

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

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

2. **Able-Bodied Adults Without Dependents (ABAWDs)**

ABAWDs is listed as a national target area and an at-risk program area. RI will consider the Town of Richmond an at risk area due to the expiration of the Statewide ABAWD waiver as of August 31, 2017.

DHS is currently working with the vendor of its new integrated eligibility system, Deloitte, to correctly identify the households residing in Richmond, RI and those

individuals and households effected by ABAWDs. While several queries of the system have been executed, issues continue to exist with the system correctly identifying the affected population. Issues are being logged as they are identified and fixes are proposed and scheduled for releases prior to the end of April 2018.

ABAWD households in Richmond will be reviewed as part of the ME review of the South County Regional Family Center which is scheduled for June 2018. A specific list of the effected cases will be drawn and a subset will be reviewed for specific ABAWDs topics in addition to the cases chosen for review for the office.

The RI DHS staff development unit, prior to the change in ABAWD status for RI, conducted state wide ABAWD training for field staff involved in processing SNAP applications and managing ongoing cases including the DHS Call Center Staff. As the ABAWD functionality in the system is improved, continued training materials and policy will be shared with all DHS staff, which a specific focus on the staff in the South County office.

### 3. Case and Procedure Error Rate

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

### 4. EBT Administrative Terminal System Security

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

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

Rhode Island's Employment and Training program is voluntary. The SNAP Employment and Training Program Review Guide will be utilized during site visits of two subcontractors providing SNAP E&T services. Reviewer will also verify if the contractor is regularly confirming SNAP eligibility of E&T participants. The reviewer will contact the Employment and Training vendor the month prior to the review to arrange the specific dates and sites. The reviewer will then send the details to FNS.

### 6. SNAP-Ed

On-site nutrition education reviews of local operations in at least two project sites will be conducted in June 2018 to ensure that operations comply with the requirements of the

Nutrition Education plan. Reviewer will utilize the Educational Activity Observation Tool provided by FNS. The reviewer will contact the SNAP-Ed vendor the month prior to the review to arrange the specific dates and sites.

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

## 7. Recipient Claims Management & Treasury Offset Program

- Recipient Claims Management and TOP

The Reviewer will work with the Project Manager assigned to complete a comprehensive assessment of the Claims, Collections, and Recoveries Unit (CCRU). The assessment will include a comprehensive review of the overall claims operations and structure of the CCRU, including staffing, operations, training, supervision, and policy knowledge and expertise. The second phase of the assessment will focus on designing, developing, testing and improving the claims functionality in RIBridges. Review of the claims functionality in RIBridges will be conducted to determine whether RIBridges is capable of tracking claims from date of discovery to establishment; determine whether the system has the capacity to track the entire claims backlog; determine whether a manual claim can be created with an establishment date prior to the 9/13/16 system implementation; and assess the recoupment logic built in RIBridges to ensure recoupment is consistent and accurate. The assessment will also include a review of the collection and postings of collections in the new system, with a specific focus on the Treasury Offset Program functionality. A final phase of the assessment will include an update to the State's Claims Management Plan.

- Program Integrity

A comprehensive review of the state's recipient integrity functions will be conducted by the end of the fiscal year. The review will focus on the new relationship between the DHS and DOA Bureau of Audits, which now oversees fraud efforts.

The State is currently coordinating plans and operations with the Fraud unit at DOA to ensure the roles, responsibilities and lines of communication are clear and meet the requirements of the SNAP regulations.

DHS and DOA will enter into a Memorandum of Understanding (MOU) that clearly defines each of the department's roles and responsibilities as it pertains to maintaining the integrity of the SNAP program. This MOU has been drafted and is currently under review by management within each department. Execution of this MOU is expected by April 30th, 2018.

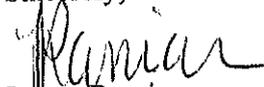
The MOU will address the areas of concern identified by FNS including;

- Front End Detection
- SNAP Policy Training
- eDRS disqualification
- Field Referrals

The Fraud unit has drafted standard business processes and procedures that are being used in conjunction with its new electronic case management system. Adherence to these policies and procedures is monitored on an ongoing basis by the unit's management and documentation of the steps followed is tracked and preserved for each case pursued. These processes and procedures will be analyzed as part of this year's recipient integrity review.

If you require further information, or have any additional questions or concerns, please contact William O'Donnell, the DHS Management Evaluation Officer, at (401) 415-8294 or at [William.Odonnell@dhs.ri.gov](mailto:William.Odonnell@dhs.ri.gov).

Sincerely,

  
Iwona Ramian  
SNAP Administrator

cc: Courtney Hawkins, Director, RI DHS  
Kimberly Brito, Deputy Director, RI DHS  
Maureen Donnelly, Associate Director for Field Operations, RI DHS  
Kimberly Nikolaidis, Assistant SNAP Administrator, RI DHS  
William O'Donnell, SNAP Corrective Action/Management Evaluation Officer, RI DHS  
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