



**United States
Department of
Agriculture**

FEB 01 2018

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

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

Dear Director Hawkins:

The Rhode Island Department of Human Services (DHS) has faced significant technical and operational issues since the rollout of the RIBridges integrated eligibility system on September 13, 2016. While the Food and Nutrition Service (FNS) recognizes the State's interest in remediating these issues in order to ensure Rhode Island families receive timely and accurate access to Supplemental Nutrition Assistance Program (SNAP) benefits, the State has failed to achieve adequate progress in many key areas. FNS remains committed to providing technical assistance to the State while also ensuring the timely implementation of required corrective actions. To that end, we have outlined several areas below for which we require additional information regarding the current status of corrective actions.

Many of the items below are referenced in the Advanced Warning Corrective Action Plan (CAP) update, which FNS received on December 15, 2017. FNS plans to provide a detailed response to that CAP update under separate cover once we receive the information required below.

Backlog of Unprocessed Documents: In the Management Evaluation Report that was issued to DHS on September 5, 2017, FNS required the State to reduce the backlog of unprocessed recertifications and interim reports by 50% within three months (December 5, 2017) and eliminate the backlog altogether within six months (March 5, 2018).

The data that was available to FNS on September 5th, showed a backlog of 12,919 unprocessed recertifications and 11,353 unprocessed interim reports. Data provided to FNS for the week of January 23, 2018 show that there are currently 14,152 unprocessed recertifications and 17,829 unprocessed interim reports. This indicates that the State has not only failed to meet the 50% reduction targeted for December 5, 2017, but that the backlog has actually increased since the report was issued on September 5th.

In an email dated October 25, 2017, FNS requested that the State submit a revised plan for achieving the benchmarks noted above. FNS has yet to receive that plan. Within 20 days, the State must provide FNS with a plan for eliminating the backlog as quickly as possible, as well as an update on the State's progress to date.

Over-Issuance of Benefits: In a letter from FNS to the State dated August 23, 2017, FNS expressed concerns regarding the over-issuance of SNAP benefits due to the implementation of RIBridges. The letter outlined several areas in which FNS was aware that over-issuances had occurred and noted the State's obligation to provide all relevant information pertaining to the identified over-issuances. On July 14, 2017, FNS had sent a detailed data request to the State for case-level information pertaining to households with unprocessed recertifications that continue to receive benefits after their certification periods have ended. We understand that a JIRA ticket is still outstanding for that request. The State must provide this data within 20 days. Additionally, FNS is requiring the State to provide, within 20 days, a plan for identifying the amount of benefits over-issued for the other areas detailed in the August 23rd letter.

Collection Claims and Recovery Unit (CCRU): FNS appreciates the designated Project Manager assigned to thoroughly assess claims management operations at CCRU and the commitment to develop a plan that will identify actions necessary to meet all claims policies and regulations. As stated in our letter of December 13, 2017, FNS would like to begin regularly scheduled meetings with a targeted group as soon as possible and will be providing meeting date options. We are requesting, at a minimum, a draft plan be provided based on internal assessments that have been conducted to date that identify the necessary actions required to bring DHS into compliance. This plan would be the basis of discussion at regularly scheduled meetings and should ultimately evolve into a more thorough plan of action based on the workgroup's ongoing efforts in identifying areas requiring further assessment and action. Within 20 days of the date of this letter, please provide a draft plan or an estimated date of when a plan will be submitted and also the anticipated date when CCRU will be fully staffed.

Quality Control (QC): Federal regulations require FNS to issue National and State FY17 error rates by June 2018. To date, DHS has completed approximately 50% of Active and 63% of Negative QC cases for FY17. There is a QC case backlog of several months, which means that DHS will miss the deadline for completing FY17 cases. This deficiency will likely impact FNS' ability to estimate FY17 error rates for the State. Within 20 days, please provide a plan for completing FY17 cases and for ensuring that FY18 cases can be completed within the required timeframes.

Centralized Scanning: FNS acknowledges the improvements made to electronic document imaging; however, we remain concerned about the high volume of processed documents that have been scanned, but not indexed and, as a result, are unavailable in the system. As of January 24, 2018, the State reported that there was a backlog of 58,000 processed documents awaiting indexing. DHS leadership has committed to providing a plan for addressing the backlog of processed documents awaiting indexing and for achieving and maintaining a steady rate of scanning and indexing. That plan should include steps the State will take to monitor the volume of processed documents awaiting scanning and/or indexing and should address staffing and training. FNS also expects the State to provide information on procedures that will be implemented to ensure the proper handling of returned electronic benefit transfer (EBT) cards and

timely treatment of incoming fair hearing requests. Within 20 days of receipt of this letter, the State must provide this plan to FNS.

Reporting: In a letter dated June 20, 2017, FNS expressed concerns with delinquency of required Federal SNAP reports. DHS provided target completion dates for seven reports: FNS-46, FNS-388, FNS-583, FNS-366B, FNS-388A, FNS-834, and the FNS-209. However, all target dates have passed without updated report entries to the Food Programs Reporting System (FPRS). Within 20 days of receipt of this letter, the State must provide to FNS an update on target completion dates for the seven reports and procedures for reviewing and ensuring the accuracy of the data.

As a reminder, per the November 2016 Advance Warning letter, the State is required to submit weekly data reports to FNS. While submission of these reports had ceased for the last three months of calendar year 2017, FNS confirms the receipt of these reports beginning again on January 10, 2018. However, as the State acknowledges, there are continuing concerns regarding the accuracy of the data. We understand that the State is working with Deloitte to improve report accuracy. Please provide an update on these efforts within 20 days.

Please contact Maria Volpe at Maria.Volpe@fns.usda.gov or 617-565-6390 with any questions. While the areas identified above reflect key issues for which there are outstanding requests, we remind the State that there are other identified deficiencies documented in the Advance Warning CAP and the September 5th Management Evaluation Report for which corrective actions have not been completed. We will address these items under separate cover.

Sincerely,



Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Yvette Mendez
Maria Cimini
Maureen Donnelly
Iwona Ramian