



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

February 16, 2018

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

Dear Ms. Brathwaite:

In response to your letter dated December 26, 2017, below please find the requested updates on corrective actions from the semi-annual Corrective Action Plan (CAP) for November 2017.

Recipient Claims Management Evaluation Review

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

**FNS Response:** This finding will remain open. The information provided by the State in this section is dated. Please provide an update on corrective actions within 30 days of the date of this letter.

**State Response:** RI DHS is currently conducting a comprehensive assessment of the Claims, Collections, and Recoveries Unit. A DHS Administrator has been assigned as the project manager for the claims work and has been tasked with reviewing and analyzing the CCRU business processes, regulations, policies, procedures, and system functionality. The project manager has created a work group to assist in the assessment, which includes staff from CCRU, fraud, financial management, and SNAP. She provides weekly updates on her work to FNS claims staff. Once the assessment is complete, the RI DHS will be able to more accurately define the needs of the unit and the gaps in system functionality that need to be addressed.

A direct supervisor has been hired for the CCRU. She started in her position on February 5, 2018. The unit also currently has four eligibility technicians and two clerical staff. Funds have been budgeted to hire two additional eligibility technicians. However, the overall staffing needs of the unit will be evaluated as part of the CCRU assessment work. Current staff is reviewing claims referred to collection prior to the launch of the new eligibility system and determining whether the referrals meet the thresholds and other requirements to become established claims once the system functionality is working properly.

**Finding #3: Inaccurate Date of Discovery used.**

**FNS Response:** This finding will remain open. The information provided by the State in this section is dated. Please provide an update on corrective actions within 30 days of the date of this

letter.

**State Response:** As stated above, RI DHS is conducting an assessment of CCRU and the claims functionality in the new integrated eligibility system. Per policy, RI DHS defines the discovery date as the date the CCRU staff determines there is adequate information to proceed with a claim and the overpayment can be calculated. Presently, there are no known issues about the discovery date in the RIBridges system. However, should any be identified through the assessment and testing of the functionality, the vendor will be asked to correct.

**Finding #5: Failure to properly determine delinquency date.**

**FNS Response:** This finding will remain open. FNS is concerned with the progress thus far with the TOP functionality in RIBridges. In looking at the most recent RIBridges project runway, the TOP interface and functionality does not seem to be listed for upcoming release. FNS is concerned that further delay of this functionality could result in the State being incapable of performing the necessary reconciliation of debts in TOP and further actions that need to be taken to come into compliance with regulations pertaining to TOP. Delay of these actions could further delay the State's re-entry to TOP by December 2018. This could also further delay closure of this particular finding as FNS is unable to validate whether the delinquency date is determined accurately in RIBridges.

**State Response:** The TOP functionality went through state user acceptance testing before the state voluntarily withdrew from TOP. The functionality is currently on hold while the CCRU assessment is conducted. Assessment of the CCRU functionality includes TOP functionality and reconciliation. Any gaps identified in the TOP functionality will be prioritized for implementation. The State will not be able to rejoin TOP interface until all claims functionality is tested, validated, and functioning properly.

If you require further information, or have any additional questions or concerns, please contact William O'Donnell at (401) 415-8294 or by email 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  
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