



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

February 23, 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 February 1, 2018, below please find the requested updates on enumerated corrective actions.

Backlog of Unprocessed Documents: RI DHS is urgently focused on processing current recertifications as they come in each month. During this process, as Eligibility Technicians are processing recertifications, they are also processing any previously unworked recertification, interim, or changes, associated with the case that has been submitted within the past 12 months (per historical recertifications following the federal guidance provided in a memorandum by FNS to Regional SNAP Directors on April 10, 2017). Households who submit recertifications by the end of the certification period but for which recertification is not complete by the end of the certification period, do not receive benefits until their recertification is processed. Once the recertification is processed, benefits are issued back to the first day of the new certification period if household retains their SNAP eligibility. After the current month's recertifications are processed, the team moves to processing recertifications that are due during the next month.

The state is currently in the process of onboarding nearly 80 new Eligibility Technicians. Many of these staff will be assigned to the SNAP program which will allow the state to begin working the additional overdue recertifications and interims. Eligibility Technicians will work cases that haven't had an eligibility determination within a 12-month period and will work entire cases including overdue recertifications, interims and changes. We have begun this process by having our most skilled staff working these cases and by developing training guidance for use by our staff as they work historically overdue cases.

Over-Issuance of Benefits: The State has provided to FNS the requested case-level information on recertifications on February 5, 2018. FNS has submitted questions and comments regarding the data submitted. DHS is working providing responses to those questions. In regards to the other identified instances of over-issuance, the state will open data service requests with the eligibility system vendor to extract case level information, including benefit issuances, that could be used to identify the amount of any improperly issued benefits.

Collection Claims and Recovery Unit (CCRU): The State is working on developing a plan to address the issues, concerns, and training opportunities around CCRU. Initial meetings with

State staff have taken place and we have identified areas that need to be involved in the detailed assessment of the RIBridges system CCRU end to end functionality. Meetings with Deloitte have also taken place and the State and Deloitte agree on the approach to properly vet the functionality and address defects and gaps found.

Since use of the CCRU functionality is limited in production, we will be using a lower environment, which will we refer to as a “sandbox” environment, to conduct our assessment. State and Deloitte are working on identifying which environment to use. This decision will be made by Friday, February 23.

Access to the sandbox environment will be granted to all parties by Wednesday, February 28. We expect initial round of the end to end assessment to be completed within six (6) weeks and all defects, Business Requirement Requests (BRR), and Service Requests (SR) to be logged by Friday, April 13. The issues will be logged as they are found, but we want to leave a small window to log anything that was not initially identified.

As defects are logged, the State and Deloitte will start to formally bucket the issues into related buckets. This will ensure that we fix like-issues together, which will allow certain areas of the functionality to be fully operational sooner. This activity will continue throughout our assessment and defects will be prioritized for upcoming releases.

As of today, the April release is already in a planning phase, which means we will not be able to schedule any of our tickets for the release on April 21st. Contractually, there are two additional releases that the State could prioritize the needed CCRU fixes in – May 19th and June 16th. These dates could shift by a week, but for now, these are the known production release dates. Depending on our assessment and other State priorities, we may or may not fit all our issues into these two releases. If we are unable to do so, the next contract would reveal releases beyond June 2018 and this CCRU team will continue to include our fixes in those releases.

Participation in this assessment is required by not only CCRU staff, but others that have a key role throughout the end to end process. In addition to CCRU staff, members from the field (Eligibility Technicians), Financial Management and Fraud will have access to the sandbox environment and take part in testing as will staff with experience in the TOP interface and the FNS-209 Reports. All personnel have been identified apart from an Eligibility Technician, but this is underway and expected to be completed by February 28.

Quality Control (QC): The State has completed review of the negative QC cases for FFY17. There are approximately five months of positive universe cases that have yet to be completed. All have been assigned to QC staff for review. For two of the months, May and September, interviews have been completed, and staff are finalizing the reviews. Interview appointments for June and August have already been mailed out and are getting scheduled.

The State is working on temporarily assigning at least four field staff to the QC unit to work directly with four experienced QC reviewers to complete the FFY17 reviews. The temporary staff

would also receive additional supervision and training from the Assistant SNAP Administrator who has extensive QC experience. The State is conducting interviews to fill a QC Reviewer position and will post another Reviewer position in the next two weeks. This will bring the total permanent QC reviewers back to a total of 6. The State is also working to backfill the two clerical support positions. The clerical staff would schedule appointments, validate samples and universe pulls, capture basic screens required for case reviews and help gather required documentation necessary for reviews. The clerical staff will be further supported by the Corrective Action Officer, who will assist in all corrective action related tasks, including representing the unit at problem managing meetings and ensuring system issues are logged and addressed.

The Unit will continue to utilize evening and weekend overtime to help complete the overdue reviews. At least one reviewer will be assigned to start reviewing FFY18 cases by March 15th, with another two reviewers starting FFY18 cases as soon as they complete the remaining two months of FFY17 reviews assigned to them. The State expects to have at least three reviewers working on FFY18 by the end of April 2018.

Centralized Scanning: The State has developed the below procedures for the scanning and indexing of processed documents that are received at Central Scanning:

- A daily report is sent to DHS staff regarding documents waiting to be indexed. Included in this report is the number of Processed Documents waiting to be scanned and indexed, as well as the total number of documents that have been scanned but not indexed;
- A daily log was created at Central Scanning to track documents received from field offices. This data will be helpful in identify potential changes in the current processes;
- DHS Central Scanning staff are indexing Processed Documents during any free time and on overtime;
- Three additional resources have been made available through the DHS Office of Rehabilitation Services, as discussed on February 14th call;
- DHS is reviewing the options of adding additional high speed scanning capacity in field offices;
- DHS is reviewing other options for additional resources to assist with indexing;
- A job posting was submitted for approval to replace the vacant supervisor position at Central Scanning.
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The State has also developed standard operating procedures for handling returned electronic benefit transfer (EBT) cards. A draft of these procedures has been shared and discussed with FNS. The State is updating these procedures based on the feedback received from FNS as well as the EBT Coordinator and legal staff, and will submit the finalized product under separate cover.

All mail received by Central Scanning is scanned and indexed into the RIBridges system within 24 hours of receipt. To ensure that request for hearings are timely forwarded to Appeals Office staff, Central Scanning staff counts the requests received, and submits the count to the Appeals Office so that they can check to ensure they are receiving the proper counts in their queues.

Reporting: The State continues to work very closely with the new integrated eligibility system vendor to ensure the integrity of data and receive all federally required reporting metrics.

Each of the FNS reports is addressed below:

FNS 46 issuance and Reconciliation Report – This report has an open correction pending which was discovered in January 2018. The ticket for this issue is RIB-63811. The target to put this fix into production is June 2018.

FNS 388 / 388A State issuance and Participation Estimates - This report has an open correction pending which was discovered in January 2018. The ticket for this issue is RIB 63808. The target date for this fix is June 2018.

FNS 583 Employment and Training Program Activity Report – this report was approved by the State. However, once the ABAWDs data was run which included the Richmond cases, the data was found not to be incorrect. Specifically, the data related to the 15% exemptions. RIB 63280 was created to address this issue. The target date to have this report fixed is April 2018.

FNS 366B program and Budget Summary Statement and Program Activity Statement – These reports are available through the RIBridges system. The 366 data has been received and is being updated into FPRS. The report should be up to date by February 28, 2018.

FNS 834 Direct Certification Rate Date Element Report – The RI Department of Education (RIDE) has notified DHS that there is a discrepancy in the data. RIDE is concerned that DHS is underreporting the number of children participating in SNAP. The State is working with Deloitte to determine the logic discrepancies, if any, to correct the data. The target date to have accurate data is June 2018.

FNS 209 Status of Claims Against Households – This report is being addressed as part of the CCRU work mentioned above.

If you require further information, or have any additional questions or concerns, please contact Iwona Ramian at 401-415-8433 or by email at Iwona.Ramian@dhs.ri.gov.

Sincerely,



Courtney Hawkins
Director, RI DHS

cc: Kimberly Brito, Deputy Director, RI DHS
Maureen Donnelly, Associate Director for Operations, RI DHS
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