

RI FFY 2017 EBT Corrective Action Response

Findings and Required Corrective Actions:

Finding Name:	EBT 17.1
Finding Language:	State agencies shall establish issuance and accountability systems which ensure that only certified eligible households receive benefits; that Program benefits are timely distributed in the correct amounts; and that benefit issuance and reconciliation activities are properly conducted and accurately reported to FNS. 7 CFR 274.1(a) FNS discovered anomalies and invalid issuances through weekly calls with the State, interviews with SA personnel and reviews of issuance files in the EBT Admin system (FIS).
Finding Evaluation:	SA must establish issuance reconciliation processes to ensure it is in compliance with 7 CFR 274.1(a). The lack of reconciliation activities is a state-wide concern affecting the entire SNAP caseload. SA is working with its integrated eligibility system vendor to establish reconciliation reports that can be utilized by the SA financial management staff to ensure only certified eligible households receive benefits and that those benefits are distributed timely in the correct amount. Additionally, SA must ensure that EBT system is providing SA with the appropriate reports on all SNAP issuances, cancellations, etc.
Root Cause Analysis:	<ul style="list-style-type: none"> A. SA integrated eligibility system is not producing accurate daily reports detailing the certified households and corresponding issuances as well as any cancelations of issuances, or other actions taken affecting benefit issuance. B. SA Financial Management Staff is not conducting reconciliation between the integrated eligibility system and the EBT system.
CA steps & timeline:	<ul style="list-style-type: none"> A. Fix system issues so that daily reports detailing certified households, issuances, and other actions taken affecting issuances are provided to SA financial management staff. B. SA financial management staff to start conducting reconciliation activities between the benefits eligibility system and EBT system.
Expected Date of Completion	<ul style="list-style-type: none"> A. August 2018 – All three system tickets mentioned below and related to the creation of system reports is scheduled to be implemented with July 7, 2018 system release. B. September 2018 – SA is targeting September 2018 to be the first month all reconciliation activities begin as regular processes.
Monitor & Point of Contact	<ul style="list-style-type: none"> A. Diane Hey, Financial Management B. Diane Hey, Financial Management
Documentation	<ul style="list-style-type: none"> A. RIB-58718 (SNAP Payroll Transmission Reconciliation Report); RIB-58714 (Food Stamp Monthly Payroll); RIB-58705 (SNAP EBT Monthly Summary) B. In September 2018, SA financial management unit will provide copies of the reconciliation reports generated for that month and used in the reconciliation processes.

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Finding Name:	EBT 17.2
Finding Language:	The State agency shall ensure that a duplicate account is not established which permit households to access more than one account in the system. 7 CFR 274.6(b)(1). FNS discovered that the SA was unable to ensure that duplicate accounts are not established to permit households from accessing more than one account in the system nor could the total number of duplicate accounts be identified.
Finding Evaluation:	SA must establish account creation processes to ensure it is in compliance with 7 CFR 274.6(b)(1). The lack of efficient system controls to prevent duplicate account creation is a state-wide concern affecting the entire SNAP caseload. SA is working with its integrated eligibility system vendor to improve the Master Client Index (MCI) clearance functions and application registration procedures to avoid creation of duplicate individuals and cases. Additionally, the SA is working with the EBT vendor to do a sweep of the EBT system to locate and deactivate any duplicate accounts as well as put mechanisms in place that will alert the SA when the eligibility system is sending over potential duplicate accounts to the EBT system.
Root Cause Analysis:	<ul style="list-style-type: none"> A. MCI logic in eligibility system must be improved to prevent the creation of duplicate individual and cases. B. SA eligibility system must be able to identify any individual active in more than one case and allow proper disposition of the duplicative cases. C. EBT system must be able to identify any potential duplicate accounts. D. SA must deactivate any duplicate accounts. E. Eligibility system must maintain EBT account information at individual level to prevent duplicate EBT account creations.
CA steps & timeline:	<ul style="list-style-type: none"> A. Implement upgrades to the MCI logic to avoid creation of duplicate individuals and duplicate applications/cases. B. Identity all individuals active in more than one SNAP case and dispose of the duplicate case. This work is ongoing as part of the data merge and data integrity work being done by SA. Completion of this work is targeted for June 2018. C. EBT vendor to provide list of accounts that match on name, social security number and date of birth, so that SA can review and determine if duplicate accounts exist. SA will deactivate any duplicate account and ensure that any active account is associated to proper case in the eligibility system. Additionally, EBT vendor will put into place a reporting mechanism that will check each file sent by the eligibility system to the EBT system for any duplicate accounts as well as any accounts that have incomplete social security information and provide such report to the SA who in turn will analyze the data and deactivate any duplicate account. Additionally, SA will analyze for cause of the missing and/or incomplete social security information to ensure correct data points are being exchanged in the file to prevent duplicate accounts from being set up in EBT system. D. SA will deactivate any duplicate accounts identified in the actions taken under C. above. E. SA will create a change request to ensure eligibility system is reprogrammed to track EBT accounts on individual rather than case level.

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Expected Date of Completion	<p>A. May 2018 - Improvements to the MCI clearance logic and application registration were implemented in the April 21, 2018 release with RIB-64236.</p> <p>B. June 2018 – RIB-38832 is the data fix ticket to address individuals active in more than one SNAP case. This ticket is being tracked as part of the data integrity theme/work and set for implementation in the June 9, 2018 system release.</p> <p>C. May 2018 – EBT vendor to provide list of duplicate accounts end of first week of May.</p> <p>D. June 2018 – Based on the information received from EBT vendor under CA 2.C., SA expects to deactivate any duplicate accounts by end of June.</p> <p>E. August 2018 – System change requirement was created. It needs to be prioritized and scheduled for a release. Current target is the August 2018 release.</p>
Monitor & Point of Contact	<p>A. Iwona Ramian, SNAP Administrator</p> <p>B. Iwona Ramian, SNAP Administrator</p> <p>C. Susan DeStefanis, EBT Coordinator</p> <p>D. Susan DeStefanis, EBT Coordinator</p> <p>E. Iwona Ramian, SNAP Administrator</p>
Documentation	<p>A. RIB-64236 (MCI Clearance/App Reg).</p> <p>B. RIB-38832 (Eligibility Issue: Individuals active on separate cases for the same program).</p> <p>C. SA will have list from EBT vendor of potential duplicate accounts by the middle of May 2018.</p> <p>D. SA will maintain list of all deactivated duplicate accounts.</p> <p>E. RIB-76572 will track the work needed to be done in the system to ensure EBT account information is tracked and maintained at the individual level.</p>

Finding Name:	EBT 17.3	
Finding Language:	<p>The State agency shall monitor all client requests for EBT card replacements and send a notice, upon the fourth request in a 12-month period, alerting the household that their account is being monitored for potential, suspicious activity. If another replacement card is subsequently requested and trafficking is suspected, the State agency shall refer that case to the State's fraud investigation unit. 7 CFR 274.6(6) Based on interview with staff it was discovered that the SA has not implemented an excessive replacement card process.</p>	
Finding Evaluation:	<p>SA must monitor all requests for EBT card replacements and issue a notice to the household upon the fourth replacement request in a 12-month period to advise them that the account is being monitored and if another replacement request is initiated and trafficking is suspected, their account will be referred to the fraud unit for investigation in accordance with 7 CFR 274.6(6).</p>	
Root Cause Analysis:	<p>A. SA is not monitoring the number of cards being issued to households within 12-month period.</p> <p>B. SA is not mailing out a notice to client upon the fourth EBT card replacement request informing household that their account is being monitored and will be referred to the fraud unit for investigation if another</p>	

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	replacement card request is initiated within 12-month period and trafficking is suspected.
CA steps & timeline:	<p>A. SA has opened a defect ticket with the eligibility system vendor indicating that system needs to be programmed as such to alert the EBT coordinator when a fourth EBT card replacement is requested on the same case within a 12-month period. This defect ticket is RIB-76769. SA has requested that this fix be implemented with the August 2018 system release.</p> <p>B. SA has opened a defect ticket with the eligibility system vendor indicating that system needs to generate and mail out a notice to household upon the four EBT replacement request within a 12-month period. This is being tracked by RIB-76776. SA is requesting that fix is implemented with the August 2018 system release.</p> <p>C. System needs to be programmed such that EBT Coordinator and/or eligibility staff could refer case to fraud unit for investigation when a fifth replacement card is requested within a 12-month period and trafficking is suspected. RIB-73490 is the change request opened with the system vendor to create a manual referral process for suspected fraud cases.</p>
Expected Date of Completion	<p>A. Target date for completion is August 2018.</p> <p>B. Target date for completion is August 2018.</p> <p>C. Target date for completion is August 2018.</p>
Monitor & Point of Contact	<p>A. Susan DeStefanis, EBT Coordinator</p> <p>B. Susan DeStefanis, EBT Coordinator</p> <p>C. Susan DeStefanis, EBT Coordinator and Robin Barradas, CCRU</p>
Documentation	<p>A. RIB-76769 will be used track system change to provide list of cases where fourth EBT replacement card is being requested on same case within 12-month period.</p> <p>B. RIB-76776 as well as the Functional Design Document and template will tack the Excessive Replacement Card Notice.</p> <p>C. RIB-73490 will track the Create Manual Referral process change.</p>

Finding Name:	EBT 17.4	
Finding Language:	<p>The State agency may make adjustments to benefits posted to household accounts after the posting process is complete but prior to the availability date for household access in the event benefits are erroneously posted. 7 CFR 274.2(g) (1). FNS discovered through interviews and case file review, the State agency made (cancellation) adjustments to household accounts after the availability date, due to duplicate erroneous issuances.</p>	
Finding Evaluation:	<p>SA shall make adjustments to benefits posted to household accounts only prior to the availability date in the event the benefits are erroneously posted as allowed under 7 CFR 274.2(g)(1). The current manual process of making adjustments will be stopped as of May 31, 2018. Currently, the system vendor is conducting “behind the scenes” checks for duplicate issuances. The SA EBT Coordinator receives reports when an issue is identified. The EBT Coordinator validates the information and cancels the duplicate issuance on the client’s account through EBT Edge. The</p>	

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	<p>effected cases are tracked and maintained on a spread sheet.</p> <p>After the benefits have been adjusted, the EBT Coordinator notifies the system vendor who adjusts the data in the system so that the accounting history matches. Spreadsheet data regarding these transactions is current from go-live to the present. A current copy of the spreadsheet will be provided to FNS upon request.</p>
Root Cause Analysis:	<p>A. Due to the lack of sufficient system checks in place to prevent duplicate EBT accounts, as well as creation of duplicate individuals and cases in the eligibility system, SA employed a manual process to check for duplicate issuances and removed the duplicate issuances manually through the EBT system. Given the CA identified above, the SA will strengthen its ability to prevent duplicate issuances from occurring and will stop the manual process of removing issuance post availability date.</p>
CA steps & timeline:	<p>A. SA will not remove benefits post availability date, unless agreed to be the client through written consent as allowable under 7 CFR 274.2(g)(2).</p>
Expected Date of Completion	<p>A. The manual process currently in place as described above will be stopped as of May 31, 2018.</p>
Monitor & Point of Contact	<p>A. Susan DeStefanis, EBT Coordinator</p>
Documentation	<p>A. N/A</p>

Finding Name:	EBT 17.5	
Finding Language:	<p>EBT cards shall be considered accountable documents. The State agency shall provide the following minimum security and control procedures for these documents: Secure storage 7 CFR 274.5(c)(1)(i) FNS reviewers visited the State's Scanning Center and observed that returned EBT cards were not maintained in a separate and secured location.</p>	
Finding Evaluation:	<p>EBT cards returned to the SA's central scanning center were not maintained in secure storage as required by 7 CFR 274.5(c)(1)(i). This deficiency affected those EBT Cards which were returned to the SA by mail as undeliverable. The cards were not separately stored under lock and key. Additionally, the SA lacked written guidance on the procedures for staff to follow when EBT cards were returned to the Central Scanning Center as undeliverable mail. Staff was not fully trained on the procedures necessary to comply with federal regulations related to secure EBT card storage. The SA has created the security policy for returned EBT cards for the scanning center. All staff at the scanning center have been trained on the new procedures.</p>	
Root Cause Analysis:	<p>A. EBT Cards returned by mail to the Central Scanning Center are not securely stored in a separate location.</p> <p>B. SA lacks standard operating procedures for returned EBT Cards at the Central Scanning Center.</p> <p>C. Staff performing returned mail duties at the Central Scanning Center are not trained on specific procedures to follow when an EBT card is returned by mail to that location.</p>	

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CA steps & timeline:	<p>A. Any EBT cards returned to the Central Scanning Center will be stored separately under lock and key in a supervisor's desk starting April 1, 2018 and ongoing.</p> <p>B. SA will develop written standard operating procedures for Central Scanning Center staff to follow when returned EBT cards are received at the Central Scanning Center. These procedures were developed on April 1, 2018.</p> <p>C. All Central Scanning Center staff will be trained on the proper procedures for processing returned EBT cards at the Central Scanning Center. This training was completed by April 1, 2018.</p>
Expected Date of Completion	<p>A. Completed.</p> <p>B. Completed.</p> <p>C. Completed.</p>
Monitor & Point of Contact	<p>A. George Bowen, Administrator, Central Scanning</p> <p>B. Susan DeStefanis, EBT Coordinator</p> <p>C. George Bowen, Administrator, Central Scanning</p>
Documentation	<p>A. N/A</p> <p>B. A copy of the Standard Operating Procedures for EBT cards returned to the Central Scanning Office is attached as RI FFY17 EBT CAR_Attachment_17.5B</p> <p>C. N/A</p>

Finding Name:	EBT 17.6	
Finding Language:	EBT cards shall be considered accountable documents. The State agency shall provide the following minimum security and control procedures for these documents: Bulk inventory control records. 7 CFR 274.5(c)(1)(iii) During the review, FNS found no evidence of policies and procedures.	
Finding Evaluation:	DHS Transmittal 15-09 enumerates the SA's EBT Security Procedures, including those for bulk inventory control records. The Transmittal has been refined and an updated Transmittal 15-09 will be shared with all DHS staff by May 31, 2018. The EBT Coordinator maintains and will continue to maintain bulk inventory control records. Each time the central office issues EBT cards to the field offices, a log is updated, signed and managed. The bulk inventory control records will be maintained by the SA as required under 7 CFR 274.5(c)(1)(iii).	
Root Cause Analysis:	<p>A. The procedures for bulk inventory control records need to be updated to satisfy the federal requirements governing this process.</p>	
CA steps & timeline:	<p>A. DHS Transmittal 15-09 EBT Security Procedures will be updated to clearly reflect the bulk inventory control records procedures.</p>	
Expected Date of Completion	<p>A. Updates to the DHS Transmittal on EBT Security Procedures has been completed. An updated copy of the transmittal will be shared with all DHS staff by May 31, 2018. The procedures will also be reaffirmed during staff meetings and huddles during the month of June 2018.</p>	

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Monitor & Point of Contact	A. Susan DeStefanis, EBT Coordinator
Documentation	A. A copy of the updated DHS Transmittal 15-09 on EBT Security Procedures is attached as RI FFY17 EBT CAR_Attachment 17.6A1. Additionally, a copy of the EBT Card Order and Inventory log is also attached as RI FFY17 EBT CAR_Attachment 17.6A2

Finding Name:	EBT 17.7	
Finding Language:	EBT cards shall be considered accountable documents. The State agency shall provide the following minimum security and control procedures for these documents: Periodic review and validation of inventory controls and records by parties not otherwise involved in maintaining control records. 7 CFR 274.5(c)(1)(v)	
Finding Evaluation:	DHS Transmittal 15-09 enumerates the SA's EBT Security Procedures, including those for periodic review and validation of inventory control and records. The Transmittal has been refined and an updated Transmittal 15-09 will be shared with all DHS staff by May 31, 2018. The EBT Coordinator conducts and will continue to conduct periodic reviews of inventory control at all six DHS field offices. Each time an EBT Card is printed at an DHS field office, staff maintains a record of that card issuance and keeps a running tally of all cards printed by that location for each day. Inventory records are checked daily by the supervisor overseeing the work of DHS staff engaged in the work of printing EBT cards. Inventory records are sent to the EBT Coordinator monthly so that reconciliation can be conducted against the bulk inventory records. The EBT coordinator also schedules periodic visits to the RI DHS field offices to validate that the security procedures are being adhered to by the appropriate field staff and the field office management. The periodic review and validation of inventory controls and records by parties not otherwise involved in maintaining control records will be conducted by the SA as required under 7 CFR 274.5(c)(1)(iii).	
Root Cause Analysis:	A. The procedures for period review and validation of inventory control and records need to be updated to satisfy the federal requirements governing this process.	
CA steps & timeline:	A. DHS Transmittal 15-09 EBT Security Procedures will be updated to clearly reflect the procedures in place for the periodic review and validation of inventory controls and records by parties not otherwise involved in maintaining control records.	
Expected Date of Completion	A. Updates to the DHS Transmittal on EBT Security Procedures has been completed. An updated copy of the transmittal will be shared with all DHS staff by May 31, 2018. The procedures will also be reaffirmed during staff meetings and huddles during the month of June 2018.	
Monitor & Point of Contact	A. Susan DeStefanis, EBT Coordinator	

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Documentation	A. A copy of the updated DHS Transmittal 15-09 on EBT Security Procedures is attached as RI FFY17 EBT CAR Attachment 17.6A1.
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Finding Name:	EBT 17.8	
Finding Language:	Storage and control measures to control blank unissued EBT cards and PINs, and unused or spare POS devices 7 CFR 274.8 (b)(3)(i)	
Finding Evaluation:	<p>The SA must continue to ensure that EBT security requirements are established in regard to the storage and control measures to control blank unissued EBT cards and PINs, and unused and spare POS devices as required to under 7 CFR 274.8(b)(3)(i).</p> <p>At the central office, the EBT cards have been under lock and key in a secured closet. Since moving to the Providence Field office in December 2017, the EBT cards have continued to be in a locked storage location with limited key access to known and authorized individuals.</p> <p>A copy of the procedural memo is attached</p>	
Root Cause Analysis:	A. All unissued EBT cards and PINs, and unused spare POS devices must be securely stored.	
CA steps & timeline:	A. Store all unissued EBT cards and PINs, and unused spare POS devices under lock and key while not in use.	
Expected Date of Completion	A. Completed. At the central office, the EBT cards have been under lock and key in a secured closet, which access allowable only to the EBT Coordinator and in her absence, the Managerial Evaluator. Since moving to the Providence Field office in December 2017, the EBT cards have continued to be located in a locked storage location with limited key access to known and authorized individuals. At present, the SA has no unused spare POS equipment.	
Monitor & Point of Contact	A. Susan DeStefanis, EBT RI DHS Coordinator	
Documentation	A. A copy of the updated DHS Transmittal 15-09 on EBT Security Procedures is attached as RI FFY17 EBT CAR Attachment 17.6A1.	

Finding Name:	EBT 17.9	
Finding Language:	The EBT system shall provide for minimal disruption of access to and service in retail stores by eligible households. Households' eligibility for prepared meals (restaurants meals program) were not being accurately reflected in RIBridges and therefore clients could not use benefits at authorized retailers. 7 CFR 274.7 (e)(1)	
Finding Evaluation:	The SA must be able to ensure access to and service in retail stores participating in the prepared meals program to all households found eligible for the restaurant meals program as enumerated under 7 CFR 274.7(e)(1).	
Root Cause Analysis:	A. The new integrated eligibility system is not correcting determining household eligibility for the restaurant meals program.	

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	<p>B. The new integrated eligibility system is not correctly communicating a household's eligibility for the restaurant meals program to the EBT system so that the proper flag can be set on the EBT card allowing its use at the restaurants participating in the prepared meals program.</p> <p>C. Households are not receiving accurate and timely notices advising them of their eligibility or ineligibility for participation in the restaurant meals program.</p>
CA steps & timeline:	<p>A. SA's eligibility system must correctly determine a SNAP household's eligibility for the restaurant meals program. This issue is being tracked by RIB-67214 and deployment of a fix is scheduled for June 9, 2018. The data fixes to correct any impacted cases are being tracked through RIB-67426 and RIB-73580.</p> <p>B. Eligibility system must correctly communicate accurate eligibility status for restaurant meals program to the EBT vendor so that the EBT card can be successfully coded to be used at the participating prepared meals providers. This issue is being tracked with RIB-65382 and deployment of the fix is scheduled for the June 9 release.</p> <p>C. Once the RMP issues are resolved. System must start sending notices to households advising them of their eligibility or ineligibility for the restaurant meals program.</p>
Expected Date of Completion	<p>A. Target date for completion is June 2018.</p> <p>B. Target date for completion is June 2018.</p> <p>C. Target date for completion is July 2018</p>
Monitor & Point of Contact	<p>A. Susan DeStefanis, EBT RI DHS Coordinator</p>
Documentation	<p>A. RIB-67214 RMP Flag is incorrectly set in case of presence of excluded members or non-requesting members in the case; RIB-67426 Recurring fix to correct RMP flag for the impacted population; RIB-73580 RMP flag correction after code fix.</p> <p>B. RIB-65382 No Issuance change with change in RMP flag. Record not being sent to FIS.</p> <p>C. Templates of the notices to Households can be provided to FNS upon request.</p>

Finding Name:	EBT 17.10	
Finding Language:	<p>State agencies shall account for all issuance through a reconciliation process. The EBT system shall provide reports and documentation pertaining to ... Maintenance of audit trails that document the full cycle of issuance from benefit allotment posting to the State issuance authorization file through posting to POS transactions at retailers through settlement of retailer credits. 7 CFR 274.4(a) (vi) The SA was unable to provide an audit trail of issuances.</p>	
Finding Evaluation:	<p>The SA must be able to provide an audit trail of all issuances including documentation of the full cycle of issuance from benefit allotment posting to settlement of retailer credits as enumerated under 7 CFR 274.4(a)(1)(vi). This deficiency is impacting all SNAP issuances at present, including any</p>	

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	adjustments, cancelations, etc.
Root Cause Analysis:	<ul style="list-style-type: none"> A. Eligibility system must be able to issue to SA daily and monthly report of all SNAP issuance authorizations. B. EBT system must be able to issue to SA a daily and monthly report of all issuances posted to EBT cards; all postings to POS transactions at retailer; and all records of all settlement of retailer credits. C. SA financial management staff must maintain reconciliation reports from issuance authorization all the way through settlement of retailer credits, the full cycle of the benefit issuance.
CA steps & timeline:	<ul style="list-style-type: none"> A. SA financial management staff as well as the EBT Coordinator will work with the eligibility system vendor to develop the necessary reports. RIB-58718 (SNAP Payroll Transmission Reconciliation Report); RIB-58714 (Food Stamp Monthly Payroll); and RIB-58705 (SNAP EBT Monthly Summary) are the three current reports that are in the process of being developed. Deployment of these report is scheduled for July 7, 2018 system release. In the course of the solution work to be done for these reports, data elements to satisfy this regulatory requirement will also be taken into consideration and addressed as part of the report scope. In September 2018, SA financial management unit will provide copies of the reconciliation reports generated for that month and used in the reconciliation processes. B. EBT Coordinator will work with the EBT system vendor to ensure SA has access to the federally required reports necessary for the end to end issuance reconciliation work. Any gaps identified will be targeted for the vendor to provide by June 30, 2018. C. SA financial management staff will perform reconciliation activities as required under the SNAP regulations in August 2018. Results of those activities and any reports may be provided to FNS for inspection in September 2018.
Expected Date of Completion	<ul style="list-style-type: none"> A. Target date for SA to receive reconciliation reports from the eligibility system vendor is July 30, 2018. B. Target date for the SA to receive reconciliation reports from the EBT system vendor is June 30, 2018. C. Target date to complete end to end reconciliation on SNAP issuances is September 30, 2018.
Monitor & Point of Contact	<ul style="list-style-type: none"> A. Diane Hey, Financial Management; John Raymond, Chief Financial Officer B. Susan DeStefanis, EBT Coordinator C. Diane Hey, Financial Management; John Raymond, Chief Financial Officer
Documentation	<ul style="list-style-type: none"> A. RIB-58718 (SNAP Payroll Transmission Reconciliation Report); RIB-58714 (Food Stamp Monthly Payroll); and RIB-58705 (SNAP EBT Monthly Summary). B. Copies of the reconciliation reports provided by the EBT system can be provided by FNS upon request. C. Upon the SA's completion of the end to end issuance reconciliation, corresponding reports can be provided to FNS upon request.

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Finding Name:	EBT 17.11	
Finding Language:	The State agency shall identify and report the number and value of all issuances which do not reconcile with the master issuance file. All unreconciled issuances shall be identified as specified on this reporting document. Discrepancies exist between the FNS-46 report and AMA Issuance amounts. 7 CFR 274.4(c)(1)(i)	
Finding Evaluation:	The SA must be able to identify and report the number and value of all issuances that do not reconcile with the master issuance file on the FNS-46, Issuance Reconciliation Report, as required pursuant to 7 CFR 274.4(c)(1)(i). The issuance amounts should match between the FNS-46 report and the AMA issuance.	
Root Cause Analysis:	A. SA must identify and report the number and value of all issuances that do not reconcile with the master issuance file.	
CA steps & timeline:	A. The eligibility system vendor must be able to extract correct issuance data on the FNS-46 report.	
Expected Date of Completion	A. The scheduled release date for the tickets related to producing reconciliation reports is July 7, 2018. The FNS-46 report updates were scheduled to be completed with the April 21, 2018 release and the report has been deployed. SA will compare the data between the report and the AMA issuance amounts. SA will work with FNS to submit all delinquent FNS-46 reports by June 30, 2018.	
Monitor & Point of Contact	A. William O'Donnell, SNAP Corrective Action Officer/Managerial Evaluator; John Raymond, Chief Financial Officer, Financial Management	
Documentation	1. RIB- 58718 is the ticket tracking the reconciliation report for Monthly Payroll. RIB-61494 was being used to track changes needed for the FNS-46 report. The report passed UAT and was deployed on April 21, 2018.	

Finding Name:	EBT 17.12	
Finding Language:	The FNS-46 report shall be received by FNS no later than 90 days following the end of the report month. FNS-46 Issuance Reconciliation Reports are not submitted timely. 7 CFR 274.4(c)(1)(ii)	
Finding Evaluation:	SA must submit the FNS-46 report timely as required by 7 CFR 274.4(c)(1)(iii). The SA has been working closely with the system vendor on the FNS-46 report since before go-live. The report was initially approved for deployment in the summer of 2017. However, defects were found in the data being pulled to complete report. Since that time, the SA has approved and the vendor has deployed a new FNS-46.	
Root Cause Analysis:	A. Eligibility system must produce a timely FNS-46 report with accurate data.	
CA steps & timeline:	A. Report is completed and deployed as of April 21, 2018. After the deployment, an issue was discovered with the data that feeds the report. Timeline for data fix is currently scheduled for June release. SA anticipates ability to submit all delinquent FNS-46 report to FNS by June 30, 2018.	
Expected Date of Completion	A. Report has been deployed with the April 21, 2018 release. Data error issues are being tracked by UHIP-182441 and scheduled for June 2018	

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	release. SA will work with FNS to submit all delinquent reports by June 2018.
Monitor & Point of Contact	A. Bill O'Donnell, SNAP Corrective Action Officer
Documentation	A. Data issue ticket: UHIP-182441, FDD of FNS-46 report.

Finding Name:	EBT 17.13	
Finding Language:	State agencies shall telephone or transmit by computer the Form FNS-388 data and mail the reports to the FNS regional office no later than the 19th day of each month. When the 19th falls on a weekend or holiday, the Form FNS-388 data shall be reported by telephone or transmitted by computer and mailed on the first work day after the 19th. The Form FNS-388 report shall be signed by the person responsible for completing the report or a designated State agency official. 7 CFR 274.4(c)(2)(i) FNS has noted untimely submission of the FNS-388 report.	
Finding Evaluation:	SA must submit a timely FNS-388 report as required pursuant to 7 CFR 274.4(c)(2)(i).	
Root Cause Analysis:	A. Eligibility system must be able to produce timely FNS-388 report with accurate data.	
CA steps & timeline:	A. Previous versions of the reports were released and subsequently discovered to have defects after they were put into production. Currently, the report was due for an April 21, 2018 deployment but it did not pass UAT. The UAT is continuing and the current schedule is for a May 5, 2018 release.	
Expected Date of Completion	A. Report is scheduled for a May 5, 2018 release date. Upon successful deployment and regeneration of the reports, SA will work with FNS to submit all delinquent FNS-388 reports by June 30, 2018.	
Monitor & Point of Contact	A. William O'Donnell, SNAP Corrective Action Officer/Managerial Evaluator	
Documentation	A. RIB-61494; UHIP-182330; and UHIP-182331 are the tickets tracking the defects and deployment plan for the report. FDD of FNS-388 report.	

Finding Name:	EBT 17.14	
Finding Language:	The Form FNS-388 report shall provide statewide estimated or actual totals of issuance and participation for the current and previous month, and actual or final participation totals for the second preceding month. In addition to the participation totals for the second preceding months of January and July, provided on the March and September reports, non-assistance (NA) and public assistance (PA) household and person participation breakdowns shall be provided. As an attachment to the March and September Form FNS-388 reports, State agencies	

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	shall provide project area breakdowns of benefit issuance and NA/PA household and person participation data for the second preceding months of January and July. FNS-388A semi-annual reports are not submitted timely. 7 CFR 274.4(c)(2)(ii)
Finding Evaluation:	SA must submit timely FNS-388A report as required pursuant to 7 CFR 274.4(c)(2)(ii). The FNS-388A report will internally be a part of the monthly FNS 388 report data. The Department will submit the 388A data semi-annually and will use the data internally monthly as appropriate.
Root Cause Analysis:	A. Eligibility system must be able to produce timely FNS-388A report with accurate data.
CA steps & timeline:	A. UAT for the FNS 388/388A report will continue. Estimated release date is May 5, 2018.
Expected Date of Completion	A. Report is scheduled for a 5/5/18 release date. Upon successful deployment, SA will work with FNS to submit all delinquent reports.
Monitor & Point of Contact	A. William O'Donnell, SNAP Corrective Action Officer/Managerial Evaluator
Documentation	A. RIB-61494; UHIP-182330; and UHIP-182331 as well as FDD for the FNS-388

Observations and Suggestions:

Observation # 1	FNS observed a lack of sound overall management of EBT systems and policy across all levels of leadership and local office staff.
Suggestion # 1	FNS suggests that the EBT Coordinator be included in senior level policy meetings including FNS weekly meetings to ensure consistency of DHS procedural and policy updates.
State Response	The EBT Coordinator will be included in the DHS Operations Meetings as well as the SNAP Policy Meetings including the weekly FNS meetings as appropriate.

Observation # 2	FNS observed a varying understanding and inconsistent practices of the SA's EBT policies and procedures.
Suggestion # 2	FNS suggests that the SA conducts EBT refresher trainings for all ETs, Supervisor and Clerks to ensure that all appropriate EBT procedures such as: issuance, reconciliation, card security and destruction are being executed consistently.
State Response	The EBT Coordinator will work with the SA's training staff to draft a curriculum on EBT that can be offered to all staff. Target date for EBT training will be Fall of 2018.

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Open Findings:

Finding # 1	Requests to Replace EBT Card
Status	A corrective action response was received by the State on December 2, 2015, and later discussed on August 30, 2016, indicating that a manual one-call process was initiated and in place. However, during the FY2017 ME, it was discovered that immediate holds are not placed on all EBT accounts at the time lost or stolen card is reported. Clients are still calling local offices to replace cards and leaving voice messages which are not accessed on weekends and holidays. The state must ensure that a one-call process is in place and implemented in all local offices.
Updated State Response	As of September 1, 2016, the SA started using a centralized call center with one main number. In the summer of 2017, all other public phones to DHS, including the EBT dedicated lines were disconnected and are no longer in use. Customers can only call the one number which connects them with the Call Center. Upon calling the customer has the option to follow interactive voice response (IVR) prompts, one of which connects caller to the EBT Customer Service line. Customers can report lost or stolen card 24 hours a day, by calling the EBT Customer Service line or the DHS Call Center and can request a replacement card to be issued. The replacement requests are sent by the EBT vendor to the EBT coordinator each morning who in turn processes the replacement requests in the eligibility system within two days. Callers who choose to speak with a call center ET can report their card lost or stolen during regular business hours and the ET will place hold on card and process replacement by the end of the day. DHS has previously provided the scripts and IVR options to FNS and can resubmit to document this one step EBT Card Replacement process available to customers 24 hours a day every day.

Finding # 2	Reconciliation and Reporting
Status	A corrective action response was received by the State on December 26, 2017, indicating that the State is continuing to work with the vendor to refine the data accuracy. FNS will continue to support the State to resolve all reporting issues.
Updated State Response	Updated corrective actions are found in the open findings section of this response as they relate to the FNS-46, FNS-388, and FNS-388A reports. Updates on all other outstanding reports will be provided by the SA to FNS as they become available. The SA is targeting July 2018, as being compliant with all federal reports with the exemption of the FNS-209 which is targeted for the end of the calendar year to coincide with the CCRU work that needs to be done.