



Food and
Nutrition
Service

Park Office
Center

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Alexandria
VA 22302

MAY 24 2018

Ms. Courtney Hawkins
Director
Department of Human Services
State of Rhode Island and Providence Plantations
Louis Pasteur Building
57 Howard Avenue
Cranston, Rhode Island 02920

Dear Ms. Hawkins:

Thank you for your April 3, 2018, request for the Rhode Island Department of Human Services (DHS) to use non-merit system personnel in its call center to provide certain information to Supplemental Nutrition Assistance Program (SNAP) households and applicants. As you are aware, SNAP State agencies are limited in how they can use non-merit system personnel to interact with SNAP households without explicit approval from the Food and Nutrition Service (FNS). We appreciate your request and the subsequent explanatory information that you and your staff have provided.

DHS has requested approval from FNS to use non-merit system personnel on a short-term basis in its call center to augment its current staffing levels and provide SNAP clients with the following general and case-specific information:

- Handling complaints (non-case specific);
- General information on SNAP, local offices and referrals;
- Taking requests to replace forms and letters, including requests for blank new applications;
- Scheduling and rescheduling interview appointments;
- Provide the following read-only information from the system: case and application status, receipt of documentation, benefit amount and date of issuance, case denial reason.

After careful review, FNS is approving the State agency's request to use non-merit system personnel to provide the above listed information to SNAP clients. FNS understands that the State has proposed these changes in an effort to provide improved customer service and quicker response times, and that using non-merit system personnel (contracted staff) to initially triage incoming calls may allow the State agency to use its merit system personnel more effectively.

FNS is approving the State agency to implement this model under the following conditions:

- The State agency must request approval in order to expand upon the allowable functions listed above. Other functions and interactions with SNAP clients must remain a responsibility of State agency merit system personnel to ensure continued Federal financial participation.
- The contracted staff will have read-only access to the State's eligibility system and will be prohibited from providing eligibility details or discussing the eligibility determination or benefit calculation with SNAP clients.
- If the caller has questions beyond the allowable information listed above about their application status or eligibility determination, the contracted staff will transfer the call to State agency merit system personnel for resolution.

- In this model, it is crucial that there be a process in place to efficiently route SNAP clients to merit system personnel in order to address any specific follow-up questions about the household's case

- Additionally, as agreed upon in prior discussions, the State should send FNS a copy of the training specific to non-merit staff when available.

In addition to these programmatic conditions, FNS would like to remind you of the requirements associated with the Advanced Planning Document (APD) process, and to provide information as follows:

- If the base contract value or any potential future amendments to the contract cumulatively exceed FNS's sole source procurement threshold of \$1,000,000, FNS formal review and approval will be required prior to the contract or amendment's execution. Additionally, a sole source request must be submitted along with the procurement documents requiring approval.
- The contract indicates that each budget line-item expenditure has the potential to exceed its estimated budget category by 10%. Please explain, in follow up to this letter, how the costs that exceed the original budget categories will be monitored.

FNS understands that DHS is contracting with the vendor for an initial four (4) months of targeted work, in accordance with Special Master Sherman's Order dated March 2, 2018 directing RI DHS to use private contractor staff to remedy the wait times in the Customer Call Center. FNS understands that the use of vendor staff is a temporary measure and that while implementing conditions of the Court Order the State is recruiting seasoned Eligibility Technicians to bring the Call Center staffing levels back to 34 FTE. As such, FNS is not considering this temporary implementation to be a major change in program operations under 7 CFR 272.15. Should the vendor's period of performance extend beyond 4 months, this change may be considered a major change, FNS will work with the State at that time to determine the appropriate reporting requirements in that regard.

Ms. Courtney Hawkins

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We appreciate our strong partnership and FNS staff stands ready to provide technical assistance as requested. If you have any questions, please contact Bonnie Brathwaite at 617-565-6397.

Sincerely,

A handwritten signature in cursive script that reads "Lizbeth Silberman". The signature is written in black ink and includes a long, sweeping horizontal line at the end.

Lizbeth Silberman
Director
Program Development Division