



State of Rhode Island and Providence Plantations
Rhode Island Department of Human Services
Office of the Director

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July 3, 2019

Bonnie Brathwaite, Director
Food and Nutrition Service, USDA
Northeast Region
10 Causeway Street, Room 501
Boston, MA 02222

Dear Ms. Brathwaite,

I am writing in response to your formal warning update letter dated June 3, 2019. We are appreciative that FNS acknowledges the progress we have been making toward the benchmarks in the formal warning letter and has granted an extension to the deadlines for completion of some of the areas. The RI Department of Human Services (DHS) reiterates its commitment to continued progress toward resolving the outstanding issues that were identified in the letter. We also appreciate the ongoing support that FNS has provided to our State and look forward to our further partnership in the future.

Please see the following updates relating to the areas identified in your June 3rd letter:

Timeliness

In accordance with the 2017 memo on Application Processing Timeliness (APT), DHS computes SNAP timeliness as the rate of SNAP initial applications approved timely during a given calendar month over the total SNAP initial applications approved during the same calendar month. Approved applications that are received at any time are considered in the calculation, as long as they are processed in the calendar month being analyzed. Applications that have been denied or have not had eligibility run (normally withdrawn applications or applications denied prior to eligibility run) are not considered in the calculation.

Applications that do not qualify for expedited service (non-expedited applications) have timeliness determined on a 30-day processing requirement. This is calculated by taking the difference between the Authorization Date and the Date Received.

Applications that qualify for expedited service (expedited applications) have timeliness determined on a 7-day processing requirement. Although DHS previously computed this timeliness rate utilizing the expedited discovery date, going forward, expedited timeliness will be calculated by taking the difference between the Authorization Date and the Date Received. On November 8, 2019, system updates will be made to treat all applications received from the customer portal in which the expedited screening questions were left blank as expedited service cases unless they are definitively screened as non-expedited. Until this modification takes place, the field is treating all customer portal applications as expedited.

Backlog Elimination

We appreciate the additional time that FNS has provided for DHS to reduce the backlog of unprocessed documents, interim reports and recertification forms. As requested, we will continue to keep you apprised of our progress in this area via the weekly reports.

Delayed Implementation of Interfaces

As stated in your June 3, 2019 letter, no action is needed in this area at this time as FNS will review the existing interfaces during regularly scheduled management evaluations.

Able Bodied Adults Without Dependents (ABAWDs)

As recommended in the letter, we will address any compliance issues related to the recent FNS ME review and provide responses via the normal corrective action process.

Electronic Benefit Transfer (EBT) Reconciliation

As requested, the following is Rhode Island's updated reconciliation plan addressing the areas identified in the formal warning update letter:

- **Monitoring of issuance files/records:**

The EBT Coordinator monitors the EBT daily activity report received via FIS and compares it with the EBT-03 report which provides the daily issuance files/records in RIBridges. If there is an inconsistency found, a JIRA ticket is created, and Deloitte is responsible for fixing it within 24 hours. If the issue is on the FIS side, a FIS ticket is created, and FIS is responsible for rectifying the issue.

- **Ensuring successful transmission:**

If there is an issue with transmission, Deloitte receives an error report (The Batch Refresh Error Report). The Batch Refresh Error Report lists all records received in the batch that were not processed due to edit errors. For those records in error, the report lists case number, record number in the file, record type and action, field in error, and error description. The information is sent to the State and Deloitte via file transfer. Deloitte uses the information on this report to correct the record and retransmit to FIS.

- **Verifying that batch totals match:**

On a daily and monthly basis, based on the State's processing schedule, the State transmits benefit authorization records to be applied to the FIS ebtEdge System database. The Batch Refresh Total Report provides totals based on the actual information contained in the file and the trailer record sent in by the State. Any error detected is reported back to the DHS Production Control Manager and Specialist.

The Batch Refresh Total Report provides statistics on each batch received. The report summarizes the total number of detail records, the count and dollar amount for the add transactions, the number of deletes, and the errors detected. The information is sent to DHS Production Control Manager and Specialist via file transfer. The State uses this report to

compare to the information sent from the State's eligibility system. Any discrepancies found are addressed.

- **Acting on rejected records, including correcting and retransmitting the records and canceling and updating the certification system:**

Any transactions that are rejected at FIS are corrected and retransmitted to FIS within 24 hours after taking necessary corrective action. If the error is due to worker error, DHS Staff is notified to take appropriate action. If the error is due to an issue with the file format, structure or content, then the file is corrected before retransmitting to FIS. If there's a rejection due to transmission technology failure, then State IT works with FIS to restore connectivity, and transactions are retransmitted to FIS within 24 hours. In regard to cancelling and updating the certification system, the EBT Coordinator (reporting to DHS SNAP Administrator) uses the FIS ebtEdge system to cancel any benefits from an individual EBT account and the same is updated back in RIBridges via service request.

- **Ensuring benefits become available on the correct dates:**

In order to validate that the benefits are posted with the correct available date, FIS provides the State with an AMA Batch Issuance Report that summarizes food benefit authorization activity by effective (available) date to allow easier tracking of automated entries to the AMA System.

- **Verify that AMA issuance values are correct:**

Financial Management staff review the daily EBT balance sheet along with the Clearing Statement Report on a daily basis. If any issues are found that can't be immediately resolved, the EBT Coordinator is alerted. The EBT Coordinator then raises the issue with Deloitte or FIS as required.

In addition to having the above processes in place, DHS will be taking advantage of a State exchange opportunity offered by FNS to visit with New Hampshire to learn about their EBT reconciliation process and ways in which we might be able to improve RI DHS's processes.

Quality Control

As you acknowledged in your June 3, 2019 letter, the DHS QC Unit has been timely with its monthly submissions since the beginning of FFY19. DHS will continue to work on improvement strategies within the QC unit and appreciates FNS's continued collaboration in this area.

Reporting

DHS has a staffing structure in place to maintain the regular reporting requirements. The SNAP Corrective Action Officer has primary responsibility for reviewing and analyzing reports for anomalies or discrepancies. Any issues with the reports will be brought to the internal data analytics team for review. If necessary, a JIRA ticket is created and addressed by the Information Management team at Deloitte.

Reports are submitted in FPRS by the Corrective Action Officer and certified by the Assistant SNAP Administrator. The Assistant SNAP Administrator will serve as back-up for the Corrective Action Officer in his absence. In these instances, the SNAP Administrator would then certify any necessary reports. The FNS-209 report will remain under the responsibility of the Financial Management team once all

historical entries are completed. Please see the attached table that includes the current status of all FNS reports.

Regular review and oversight of data and reporting logic fall within the purview of the Data analytics team at DHS – Kevin Slattery and Michael Hauer.

Currently, we are not aware of any data elements of reports that may need to be adjusted. However, based on ongoing conversations between FNS and the State regarding overissuances, revisions to lines 9 - 13 of the FNS-46 may need to be completed.

Claims, Collection and Recovery Unit (CCRU)

Significant enhancements have been made in RI Bridges to allow the processing of referrals and claims. Additional functionality is scheduled for implementation in September of 2019.

The unit, as a whole, has made substantial improvement. CCRU staffing is stabilizing. As the unit experiences turnover/vacancies, positions are immediately posted for backfill. Currently, all unit positions are filled (with two new hires starting on 7/8/19 and 7/21/19); however, there will be a retirement as of June 3, 2019. The process to backfill that position is already underway. A new supervisory position is being added and is expected to post shortly. The overall morale and enthusiasm of the staff have improved as a result of recent changes.

DHS has pursued two avenues to stabilize the unit. The first step was to develop a staffing model to support the work, which is reflected in the proposed organizational chart. The staffing model doubles the previous level of supervisory staff and increases claims processing staff. The unit currently resides under the SNAP administrator. DHS is considering the benefits of moving the unit under the administrative supervision of financial management or operational administration. The SNAP Administrator will continue to provide guidance and oversight relating to all SNAP related CCRU work.

Staff turnover is an obstacle that challenges the Department across all programs and units and leadership team is working actively to make improvements that reduce in reduced turnover. To reduce the staff “churn” within the CCRU unit, we have developed new job descriptions that are specific to CCRU. The job descriptions were developed after a review of job descriptions and titles from seven other States. The roles and responsibilities were cross-walked with existing Rhode Island job titles and descriptions. From that process, two job descriptions were developed: DHS Benefit Integrity Claims Examiner and DHS Benefit Claims Specialist. Both roles require DHS experience. The Benefit Claims Specialist is a higher pay grade and will be responsible for completing more advanced CCRU functions. An internal review of these job descriptions is in process. Once the internal review is completed, the job descriptions will be shared with FNS for review and comment. These job descriptions will also be shared with the appropriate unions.

The unit is currently restricted to working only the cases in the FNS pilot. However, the staff model was developed to encompass and support all DHS programs. DHS anticipates the pilot will provide additional insight into what resources may be needed to work the historical CCRU cases in addition to the current work of the unit. It is important to note that with the improvements to RIBridges and staff training, DHS anticipates a different level of complexity between historical claims and future referrals.

In partnership with PCG, training materials were developed specifically for the roles, responsibilities and functions of CCRU. These materials are being enhanced by the outcomes of the current pilot. The DHS Center for Staff Development and Learning has also developed a curriculum for the eligibility and operational supervisory staff that will also support the CCRU staff. It is anticipated that CCRU staff will be offered this training within the next 2-3 months.

In closing, I appreciate the opportunity to provide the FNS team with this update. Please let me know if you need further information or explanation about anything contained in this response.

Thank you,

A handwritten signature in black ink, appearing to read 'CEH', written in a cursive style.

Courtney E. Hawkins
Director, RI Department of Human Services