



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

June 29, 2018

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

RE: RI FFY 2017 Electronic Benefits Transfer (EBT) Review Corrective Action
Response (CAR)

Dear Ms. Brathwaite:

As requested in your letter dated May 25, 2018, attached please find the responses to long-term corrective actions and findings not sufficiently addressed for the FFY 2017 EBT review.

Thank you for continued support, collaboration, and technical assistance as we work to meet federal compliance with the new integrated eligibility system and improve our administration of SNAP.

Should you require any additional information, please do not hesitate to contact me or my staff.

Sincerely,

Courtney Hawkins
Director, RI DHS

CC: Matthew Henschel, Team Lead, USDA, FNS, NERO
Maria Volpe, RI State Desk, USDA, FNS, NERO
Kimberly Brito, Deputy Director, RI DHS
Maureen Donnelly, Associate Director for Operations, RI DHS
Iwona Ramian, SNAP Administrator, RI DHS

Enclosures

Long Term Corrective Action

The CAR sufficiently addressed the findings listed below, but Corrective Action steps have not been fully implemented or validated yet. These findings can transition to the State's semi-annual CAP unless otherwise specified.

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.S(c)(l)(iii) During the review, FNS found no evidence of policies and procedures.
FNS Comments: Expected date of completion has been identified in CAR as May 31, 2018. If outlined corrective action is achieved prior to submission of next semi-annual CAP, please submit documentation to substantiate validation.
State Response: The State has written and published "DHS Transmittal 18-08" (Attachment #1) and "SOP EBT Cards Central Scanning" (Attachment #2) which address the security measures for EBT security. On 6/8/18, the transmittals were placed in the DHS document repository and emailed to all staff for review. Copies are attached for verification.

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.S(c)(l)(v)
FNS Comments: Expected date of completion has been identified in CAR as May 31, 2018. If outlined corrective action is achieved prior to submission of next semi-annual CAP, please submit documentation to substantiate validation.
State Response: The State has written and published "DHS Transmittal 18-08" (Attachment #1) and "SOP EBT Cards Central Scanning" (Attachment #2) which address the security measures for EBT security. On 6/8/18, the transmittals were placed in the DHS document repository and emailed to all staff for review. Copies are attached for verification.

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)(l).
FNS Comments: Corrective action has been completed as outlined in the CAR. However, this finding will remain open until FNS is able to validate implementation of corrective action.
State Response: The State has written and published "DHS Transmittal 18-08" (Attachment #1) and "SOP EBT Cards Central Scanning" (Attachment #2) which address the security measures for EBT security. On 6/8/18, the transmittals were placed in the DHS document repository and emailed to all staff for review. The transmittal 18-08, specifically addresses the storage and inventory control measures for the for the blank and unused EBT cards. There are no PIN numbers associated with blank cards. All cards are pinned when activated by the client for whom the card is issued. Spare POS devices are under lock and key and access is limited to SNAP administrative staff.

Finding name: Open finding EBT 15.2
Finding language: Reconciliation and Reporting

<p>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.</p>
<p>Evaluation: Provide FNS with process and procedures do the EBT vendor sweep of the EBT system. Will this require a change request? What will the look back period be? Provide a more in-depth analysis of the MCI challenges, and specific areas that the vendor aims to improve.</p>
<p>Root Cause Analysis:</p>
<p>A. What about the manual creation of accounts? Will this be taken into consideration? Additionally, will the logic take into account the dropping of the last digit of the SSN?</p>
<p>D. Will the SA OP referrals for clients who've received OP on the duplicate accounts?</p>
<p>E. What unique identifier(s) will be used to identify individual level information to prevent duplicate account creation?</p>
<p>Corrective Action Steps & Time line:</p>
<p>A. Please clarify what upgrades will be implemented to the MCI logic.</p>
<p>B. What is the timeframe? Please provide FNS with design documents or reports of the work targeted for June. Who is responsible for completing the work? What are the processes and procedures for ensuring that the work is accurately completed?</p>
<p>C. Should there be any funds on the duplicate accounts, how will they be handled? Say client was entitled to funds but they were distributed on different accounts for different time periods, how will the account be made whole? Regarding the new reporting mechanism to check files, is there a change fee associated with this new report? What is the name of the new report?</p>
<p>E. Is there a detailed design for this change request? Is this with the EBT vendor or Eligibility vendor? What are the costs associated with the request?</p>
<p>Documentation:</p>
<p>A. Provide FNS with copies of implementation documents.</p>
<p>B. Provide FNS with ticket and associated fixes.</p>
<p>C. Provide FNS with copies of duplicate lists</p>
<p>D. Provide FNS with copies of all deactivated accounts. Include number of clients, accounts number and dollar amounts on each deactivated account.</p>
<p>E. Provide FNS with detailed system change document</p>
<p>State Response:</p> <p>A. Potential manual creation of accounts in FIS is only possible with a high level of access. Access at this level is limited to two individuals at RI DHS. They are the EBT Coordinator and the EBT back-up person. Ticket ██████████ (Attachment #8) was released as part of release 7.20. The State is researching the cause of the last digit dropped from the SSN being transmitted to FIS and will update FNS as appropriate.</p> <p>B. Changes to the MCI are outlined in the JIRA ticket ██████████ (Attachment #9). Iwona Ramian, SNAP Administrator and a designated review team are responsible for ensuring the ticket was completed accurately through oversight and research.</p> <p>C. The FIS vendor has provided the state with a report listing potential duplicate cases. The EBT coordinator is reviewing the report. If any cases are found with benefits on an "old case" after a "new case" has been created, the benefits are manually retracted from the</p>

Root Cause Analysis:
B. Are cards mailed out with the local office return address? If so, are there procedures to secure cards at the local office?
Corrective Action Steps & Timeline
C. Provide copy of training materials.
State Response:
B. The cards are mailed out with the local office address on the return section of the envelope. Attached are the SOP (Attachment #2) and Security procedural memo (Attachment #1).
C. There are no additional training materials. The Administrator and supervisor reviewed the procedural memo with the staff and did a walk through and a hands-on instruction.

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)
Root Cause Analysis:
C. What is the day to day manual work around for identified issues?
Documentation:
A. Provide FNS with copies of tickets and fixes.
B. Provide FNS with copies of tickets and fixes.
C. Provide FNS with templates of the notices.
State Response:
A. Copies of tickets [REDACTED] and [REDACTED] are attached (Attachments # 16, 17 and 18). The details of the "fix" for the problem are detailed within the respective tickets.
B. Copy of ticket [REDACTED] is also attached (Attachment #19). Details of the "fix" are included in the ticket itself.
C. Copies of the notices are attached (Attachments # 20 and 21).

Finding name: EBT 17.10
Finding language: 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.
Corrective Action Steps & Timeline:
B. Is a change request required to obtain reports? Will RI DHS staff have access to run the reports without a request from the vendor?
Documentation:
A. Please provide copies of tickets: [REDACTED] (SNAP Payroll Transmission Reconciliation Report); [REDACTED] (Food Stamp Monthly Payroll); and RIB-58705 (SNAP EBT Monthly Summary).
B. Please provide reports as available.
State Response:

A. Please submit copy of reports for review when available. FNS will review data prior to entry in FPRS
Documentation:
A. Provide copy of tickets [REDACTED], [REDACTED], and [REDACTED]. Provide copy of final FNS-388 FDD.
State Response: The FNS-388 is scheduled for release in July 2018. Copies of tickets [REDACTED] (Attachment #22), [REDACTED] (Attachment #25), and [REDACTED] (Attachment #26) as well as [REDACTED] State Issuance and Participation Estimates [REDACTED] (Attachment #27) are attached.

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 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)
Expected date of completion:
A. Was report deployed on 5/5/18 as indicated in CAR? Please submit copy of reports for review. FNS will review data prior to entry in FPRS.
Documentation:
A. Provide copy of tickets [REDACTED], [REDACTED], and [REDACTED] as well as FDD for the FNS-388.
State Response: The FNS-388 is scheduled for release in July 2018. Copies of tickets [REDACTED] (Attachment #22), [REDACTED] (Attachment #25), and [REDACTED] (Attachment #26) as well as FDD_TDD_FNS-388-State Issuance and Participation Estimates [REDACTED] (Attachment #27) are attached. The report for the FNS 388A is included in the data for the monthly FNS-388 from Deloitte to the State. The State will submit the FNS-388A data in FPRS for the appropriate bi annual FNS required months once the report RIBridges has been produced and verified by the State.

Finding name: Open finding 15.1
Finding language: Requests to Replace EBT Card
FNS Comments: Process outlined is still a two-step process, RI DHS should establish one number that clients call to report cards lost or stolen. Please provide FNS with scripts and IVR options.
State Response: The State is currently conducting a one call card replacement request process.

