USDA

United States Department of Agriculture

Food and Nutrition Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

APR 1 6 2018

Courtney Hawkins, Director
Department of Human Services
Louis Pasteur Building
57 Howard Avenue
Cranston, RI 02920

Dear Director Hawkins:

The Food and Nutrition Service (FNS) appreciates the Rhode Island (RI) Department of Human Services' (DHS) cooperation as FNS continues to monitor Supplemental Nutrition Assistance Program (SNAP) concerns that have emerged as a result of the implementation of the State's integrated eligibility system (IES) on September 13, 2016. FNS understands that DHS remains committed to improving system functionality, however, the progress to date has been insufficient to address many long-standing issues.

FNS has determined that DHS has failed to meet the requirements set forth in the November 8, 2016, advance warning letter. Consequently, this letter serves as formal warning that DHS could soon be subject to suspension of up to $913,830 in Federal funding for State administrative expenses in accordance with 7 CFR 276.4(d)(1). This amount represents one quarter of the State's Federal Fiscal Year (FFY) 2018 projected State administrative expenses for SNAP certification.

Since issuing the advance warning letter, FNS has continued to support Rhode Island's efforts to mitigate system and programmatic issues through guidance and technical assistance, as well as to monitor the State's progress through weekly calls, regular site visits, and multiple onsite Management Evaluations (ME). FNS has concluded that serious issues persist, impacting nearly all aspects of SNAP operations. The attached document reflects the major issues documented to date by FNS. DHS has 30 days from the date of this letter to respond with corrective actions or submit additional evidence that the State is in compliance with SNAP regulatory requirements as specified in the November 8, 2016 letter and subsequent CAP responses.

As required by FNS, the State provided updates on corrective actions related to the November 8th advance warning letter on December 15, 2017. On February 1, 2018, FNS requested additional information related to these corrective actions. The response that FNS received failed to identify a timeline for addressing the backlog of unprocessed documents, and FNS has concerns about the State's ability to meet timelines in place for other critical corrective actions. Within 30 days of the date of this letter, the State must identify specific timeframes and benchmarks, as well as staffing plans and points of contact for addressing each of the areas of deficiency outlined in the attached appendix. If DHS submits an acceptable CAP, FNS will hold this formal

warning in abeyance pending completion of the corrective actions in accordance with the CAP. If the State's response is inadequate, FNS could suspend Federal funding of State administrative expenses as early as May 17, 2018.

We appreciate your commitment and attention to addressing these issues. Our goal is to help DHS avoid suspension of administrative funding and ensure access to SNAP for eligible households in RI as well as the integrity of the program. We look forward to continuing our strong partnership and working toward our shared goals of ensuring SNAP access and integrity. FNS staff located in the Northeast Region and at the National Office are ready to continue providing technical assistance and guidance to assist the State in working towards enhanced customer service and more effective and efficient administration of the program. If you have any questions or wish to discuss this further please contact me at (617) 565-6370 or Bonnie Brathwaite at (617) 565-6397.

Sincerely,

Kurt Messner
Regional Administrator
Northeast Region

cc: Jessica Shahin
       Karen Painter-Jaquess
       Bonnie Brathwaite
       Maria Cimini
       Maureen Donnelly
       Yvette Mendez
       Iwona Ramian

Appendix to Formal Warning Letter:
Issues Impacting Rhode Island SNAP Access and Integrity

Certification
- Failure to close thousands of cases because of unprocessed recertifications and periodic reports;
- Failure to process initial applications within statutory timeframes;
- Failure to process recertfications, periodic reports, and other case documents in a timely manner;
- Failure to run electronic data matches likely resulting in over-issuance of benefits as well as issuance of benefits to ineligible households;
- Improper case closures resulting from incorrect data conversion;
- Inability to properly track and route applications, periodic reports, and other case documents to the proper work queues;
- Inability to pull accurate reports on the number of initial applications and recertification applications received and processed to a decision;
- ABAWD functionality remains inadequate; and
- Persistent issues with functionality related to the Standard Utility Allowance, resulting in inaccurate benefit issuances to thousands of households.

Issuance
- Duplicate accounts established with duplicate payments made either electronically or manually through the Electronic Benefits Transfer (EBT) administrative terminal and lack of controls in place to prevent duplicate issuances;
- Benefit issuance and reconciliation activities are not properly conducted or accurately reported;
- Open defect tickets indicate SNAP benefits were issued prior to application date;
- Open defect tickets indicate SNAP benefits were issued in excess of the maximum household allotment; and
- The State agency is unable to demonstrate security and control procedures for EBT cards and system access.

Quality Control
- The State has a backlog of Quality Control reviews and missed the deadline to submit Active cases for FFY 2017.

Reporting
- The State has failed to submit required reports in the Food Programs Reporting System (FPRS); and
- The State has failed to provide accurate data regarding program performance and operations, including lobby wait times and case-level data on unprocessed recertifications.

Recipient Claims Management
- Recipient Claims functionality has known defects and is currently inoperable;
- Claims staff have not been adequately trained to use the new system;
- State is unable to properly track and update debts in the Treasury Offset Program (TOP) system and has removed itself from TOP; and
- Backlog of referrals identified that exist from INRHODES.

Customer Service
- Long wait times at local offices and the call center;
- Backlog of unprocessed fair hearing request documents and appeals; and
- Inaccurate or unclear notices sent to clients.

Scanning/Mail Center
- Backlog of several thousand pieces of returned mail and processed documents awaiting indexing to a case.

System Functionality
- Workers continue to engage in multiple manual workarounds to complete basic tasks in the system;
- System fixes are improperly tested or are implemented with known defects that result in additional system issues; and
- System currently lacks functionality required for State to meet Federal regulations.

Case load data (FNS discretion):

The State should include household and individual case load data for the previous six months to identify any trends of increases or decreases in the case load. If the State identifies a significant decrease (greater than 5%) over the last six months, FNS requests the State provide its own analysis on why the decrease is occurring.

FNS Comment: *Currently, the State is not reporting Individual and household participation rates on the FNS-388 reports. This matter has been addressed in the FFY2017 SNAP EBT Review report; the State is required to address the lack of reporting in its Corrective Action Response. DHS staff continue to provide states updates to FNS staff on the development of these reports.*

DHS Response:

The Department has been reviewing the data that is available. A copy of the data and graphs are included (see Artifact #1).

The number of SNAP households was reduced by approximately 6,000 in the first eight months after the new integrated eligibility system was launched: from 99,894 in September 2016, down to 93,509 in June 2017. Since that time, the number of households has varied by just over 2,000 (decreased and increased). Current participation is 93,895.

The initial decrease in participation may be partly attributed to the challenges RI DHS has experienced with the roll out of the new integrated eligibility system, RIBridges. The agency experienced long lines and delayed processing of applications and recertifications. The long lines and system issues may have dissuaded people from applying. However, despite a more stable system and improved timeliness, participation numbers have not increased to prior levels. Instead, there has been a steady decline.

The decrease in participation has been a relatively steady slope. There has not been a drastic drop in participants since the first few months after the launch of RIBridges. Additionally, the RI unemployment rate began to decrease in 2016. Although lagging behind, the SNAP participation began to decline as well. A similar trend was evident in the 1990's data. Conversely, In the late 2000's, as the economy declined, and unemployment rose, the SNAP participation figures had a parallel reaction. The national figures appear to support this parallel reaction as well.

As the participation numbers on the FNS 388 are refined, new functionality is deployed into production in RIBridges and updated reports are run from the system launch date to the present, this data will be re-analyzed for any changes that may be depicted in the updated data.

Payment Error Rate (PER) (FNS discretion):

Per 275.16(b)(1) the State must provide Corrective Action steps if the State's error rate is 6% or above. The State should include an update on payment accuracy for months where the State has completed its State QC review but has yet to submit data to FNSQC staff. This information is helpful to identify and start mitigating potential issues. FNS may request for updates even if the State is not above 6%, if the State's PER is of concern to FNS.

FNS Comment: *The State's PER for FFY2017 (cumulative for October 2016-August 2017) was reported to be 11.07. Please provide the key drivers affecting accuracy along with the State's plan to address the issues.*

DHS Response:

The Department has been experiencing a high error rate since our new integrated eligibility system went live. This has been a combination of system and worker errors. The factors that contributed to the high PER as well as the State's plan to address the issues are provided below.

1.   Training

Initially, the level of unfamiliarity with the then new RIBridges system was a contributing factor to the high error rate. Workers were learning how to process cases in the new system and were not as familiar with the procedure for checking eligibility results.

Due to the multitude of changes and system challenges, RI DHS was faced with long lines and a large backlog of case actions. Workers were directed to process cases as quickly as possible to ensure timely delivery of benefits. Unfortunately, an unintended consequence of the rapid approval of cases to reduce the backlog was less time for workers to review the cases for errors prior to approval.

Another contributing factor to the increased PER was the number of newly hired Eligibility Technicians (ET's) at the Department. The Department hired numerous new ETs to fill vacancies and to increase the work capacity. The new staff were SNAP trained, but as with any new hire, required time to become innately familiar with SNAP policy and eligibility system. Additionally, Supervisors are required to review and approve the work of all new ET's. The relatively high number of new employees within a short time frame combined with the higher than normal operational tempo was a contributing factor to the overall high error rate.

As stated in the 5/15/18 Formal Warning Response, to address the aforementioned issues, the Center for Staff Development and Learning (CSDL), formerly the Staff Development Unit, has steadily been revising and enhancing its comprehensive training plan for RI DHS employees. The training team underwent a transformation and has shifted its learning management practices to mirror that of a learning development center (LDC) which includes a range of on-the-job and off-the-job methods for acquiring necessary knowledge, skills and behaviors. The CSDL

team has developed and begun to implement a competency-based training curriculum for all staff. The curriculum addresses how RI DHS welcomes new employees to the agency while supporting existing employees as the agency stabilizes and strengthens its core business process.

Supervisor Training Program

With assistance from the Center for Human Services (CHS), at the University of Rhode Island (URI), CSDL has developed a Supervisor Professional Development Program. The program has four modules totaling 21 hours of training in phase one, and another 12 additional hours in phase two. The training topics include guiding the work, organizing the work, managing relations, and communications. Each module builds capacity by strengthening supervisory competencies, such as: interpersonal savvy, building effective teams, accountability, and results-driven outcomes. Topics covered also include effective leadership style and delivering extraordinary customer service. CSDL is currently working with CHS to build out each module and expect to roll out the program in September 2018.

More information about training-related improvements is provided in the 5/15/18 Formal Warning Response.

2.   System Issues

Work Arounds

A contributing factor to the increased error rate was the amount work arounds that were required while system issues were being addressed. These work arounds were not always implemented in a standardized manner or easily tracked, thus enhancing the potential for error. To mitigate this issue, the following six-step process has been developed, as detailed in the 5/15/18 Formal Warning Response:

Step one is identifying the workaround. Identification occurs either in the field office or by the Deloitte Application Development team triaging a defect. Next, the workaround steps are documented. The training team is responsible for formatting content and preparation of testing materials. Testing is the third step and essential in the process. The Deloitte testing team confirms the instructions are correct and the method is not only viable but does not create negative downstream issues. Once tested the training team produces training materials for state approval. The sixth step is to publish the workaround in Online Help. Staff utilizing the workaround receive written training materials, verbal review at morning huddles, supervisory coaching, on-site support and Online Help within RIBridges.

The workaround is tracked with the JIRA and monitored through the JIRA dashboard. Following a defect fix, Deloitte and the state determine if the workaround is no longer needed. The workaround is then retired.

Since September 2017, DHS has retired twenty-six (26) workarounds. There are currently three (3) active workarounds and five (5) in the establishment process.

Inadequate Testing of System Fixes

System fixes were improperly tested or were implemented with known defects that resulted in additional system issues leading to potential errors. In order to improve quality, Deloitte and the State continue to work on improvements to testing. The State is committed to testing as many defect tickets as possible for each release. As detailed in the 5/15/18 Formal Warning Response, during the month of April, the State added 24 entry-level testing staff via a contractor to execute more test scrips in UAT. Over the next few months, the State has asked KPMG to add 6 staff to support test scripting and executive oversight. These resources will be onboarded in June and are expected to contribute to releases after June. The State is also working with KPMG on the possibility of automating UAT regression and is awaiting a proposal from the vendor. Finally, The State recently requested that CSG (IV&V vendor) perform a focus area assessment on Deloitte SIT processes. The outcome of this assessment will be implementation of recommendations and monitoring of results/process improvements.

Further, the State, through KPMG, is expanding its regression suite. Finally, the State is planning to launch "Business Simulation" testing for each release where eligibility technicians will work cases end-to-end in the testing environment to identify any issues that may have been introduced by new code and not caught, for whatever reason, by the regression suite.

We have also made process improvements on testing. Deloitte and the State have introduced a test planning tool which is capturing the scope of both SIT and UAT testing including the scenarios and scripts to be executed. Planning meetings are being held on a weekly basis with the IT Leadership team to discuss testing coverage for each release and to review overall progress and surfacing issues/challenge being faced by the testing teams. Finally, the State and Deloitte have introduced a release planning checklist and continue to iterate on it to ensure that we learn from each release.

Finally, the State and Deloitte abide by their ITIL based governance process to highlight deficiencies and make go/no-go decisions before releases are put into production. Consequently, should release fail SIT or UAT for whatever reason, they are not put into production without first clearly and transparently understanding the risks and issues presented by the testing team for executive review.

The State and Deloitte are making changes to test planning and execution to improve quality before delivery. Deloitte has brought a best practice set of core regression test scenarios to validate the system with each release to help prevent "breaking" core functions as fixes and new functionality is released. This core regression test suite will continue to be reviewed and enhanced with input from the State program unit owners to continuously improve the overall coverage of the scenarios and cover unanticipated issues discovered in releases. The core regression test scenarios are currently "manually" operated, but Deloitte is automating them which will allow more comprehensive testing in shorter timeframes. Deloitte has represented to the State that these will be operational and running for releases in June.

To understand whether these efforts are working, the State and Deloitte look at "injection" of tickets and defects following each release, looking to ensure that there are not spikes following each release. These numbers are provided weekly in the Deloitte Executive Status deck.

3.   Scanning Issues

Operational challenges led to a backlog of scanned documents. Not having the appropriate documents indexed to a case or not properly indexed can cause payment errors.

As detailed in the 5/15/18 Formal Warning Response, in the June/July 2017 timeframe, 2 major improvements were made to the EDM process. The first was the automation of the Undeliverable Mail by reading the "QR" code on the piece of undeliverable mail, taking a picture of the outside of the envelope, and having Deloitte automatically upload the documents into the electronic case file (ECF) for that individual. This automation eliminated the need to manually scan and index 90% of all the undeliverable mail.

The second major enhancement was the introduction of smart separator sheets at Central Scanning. The smart separator sheet, when used with a document containing a "QR" Code, will allow for documents to automatically index by reading the case number contained in the "QR" Code. This will help reduce the amount of manual errors because it eliminated the need for workers to manually type in the case number. With the upcoming late summer release of new RIBridges functionality, the field offices with all be scanning their own documents as well as utilizing smart separator sheets.

<u>QC completion rate (FNS discretion):</u>

Per 275.16(b)(4)The State must provide Corrective Action if the State codes 5% or greater of their QC cases as "not complete".

FNS Comment: *This deficiency was addressed in both the Advanced Warning issued to the State on November 8, 2016 and in the Formal Warning issued to the State on April 16, 2018, the State is required to include a corrective action plan in it's response due to FNS by May 17, 2018.*

DHS Response:

At the end of May 2018, RI DHS was informed by FNS that work on the FFY 2017 cases could be stopped, and the RI DHS should focus its attention solely on reviewing the FFY 2018 cases at this time.

Rhode Island Semi- Annual Corrective Action Plan – May 2018

As stated in section 6.1 of the 5/15/18 Formal Warning Response, work has started on FFY18 case reviews. The reviewers are working overtime and on weekends to complete these reviews. The department's goal is to complete all FY18 reviews by the end of December 2018, so that FFY19 work can be started under a steady staffing state and on time.

To meet the target completion date of December 31, 2018, the QC Unit needs to establish efficient processing procedures, leverage the tools available in RIBridges and determine staffing needs. DHS is working in partnership with Deloitte and PCG to analyze these three areas. The goal is to reduce the average time to complete and document a QC review to 2 hours. The Department is prepared to staff, train and supervise staff to this goal. If required, the Department may seek FNS approval to use one of the State's contracted auditing resources to provide additional staff to support the backlog of QC work. The need for this will be evaluated by June 30, 2018.

System functionality defects related to QC have been flagged as priority issues for upcoming system releases.

Processing timeliness (FNS discretion):

The State should provide an update on its processing timeliness rates for months where the State has completed review of cases but have yet to submit data to FNSQC staff. This information is helpful to identify potential issues related to FNS' timeliness protocol and help State avoid escalation.

FNS Comment: *The Food and Nutrition Act of 2008, as amended, requires that households have the opportunity to participate in SNAP within 7 days for expedited cases and 30 days for regular cases. While States are required to process all SNAP applications within the timelines provided in the statute, FNS considers an APT rate of 95 percent and above acceptable performance. State agencies are subject to the escalation procedures when APT rates fall below 90 percent. States with an APT rate below 90 percent should have a corrective action plan (CAP). FNS publishes quarterly timeliness data based on the sample of cases pulled during a quality control review. The last quarterly report did not include RI due to the difficulties in obtaining the data required.*

States also generate their own timeliness data and are required to follow State Timeliness Data Protocol to pull and analyze timeliness data for the entire caseload. During the State Program Access Review (SPAR) conducted in March 2018, the State reported their own timeliness measure for January of 2018 to be 83% for Expedited and 82% for Non-Expedited. When the State's APT rate is below 90 percent, the State is subject to the escalation procedures.

This deficit was addressed in both the Advanced Warning issued to the State on November 8, 2016 and in the Formal Warning issued to the State on April 16, 2018, the State is required to include a corrective action plan in its response due to FNS by May 17, 2018.
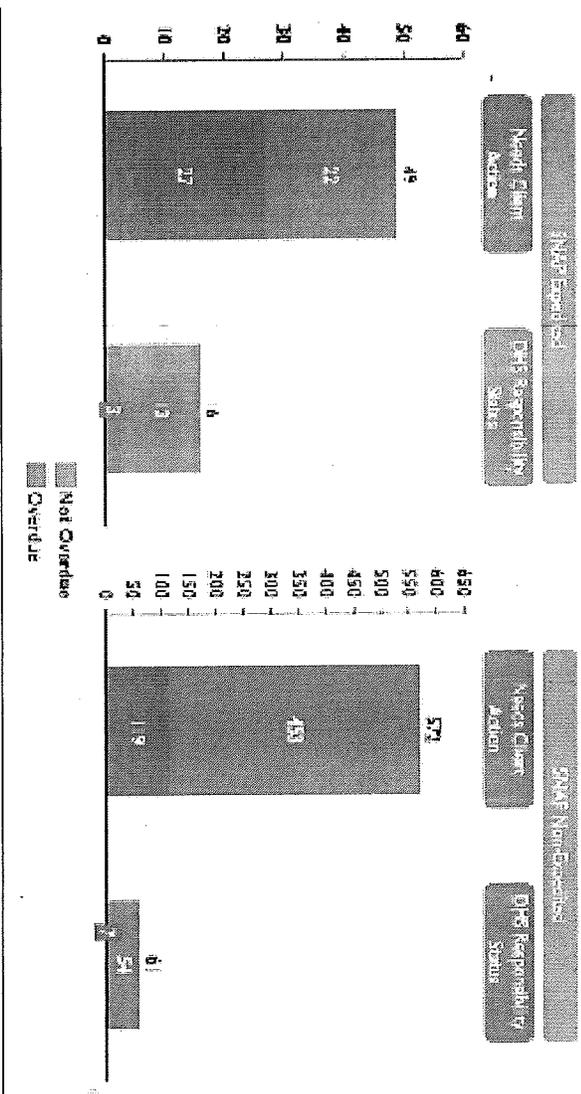
DHS Response:

The state has responded to this issue in the recent 5/15/18 Formal Warning Response with the following:

Timeliness is steadily improving. The State reviews pending SNAP applications daily. The chart below represents the number of overdue pending applications on 5/6/18 and is typical of the daily throughput reviewed by the team. Additionally, SNAP timeliness for the month of April 2018 averaged 90%. The Department is addressing the scanning process, the staffing, training, and office procedures. The culmination of all these changes is expected to not only reduce the PER, and reduce the timeliness, but also vastly improve the client experience with RI DHS.
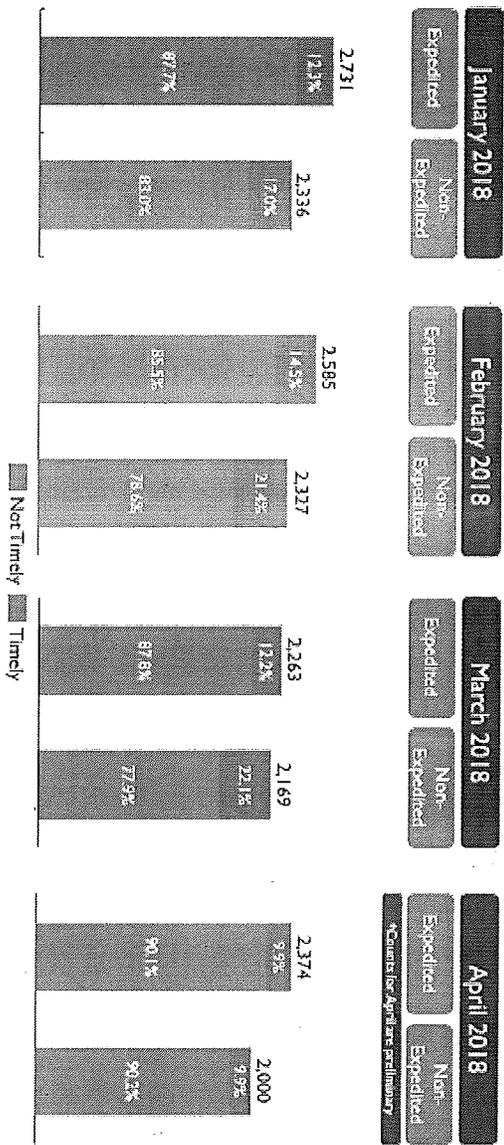
SNAP Pending Applications

SNAP TIMELINESS
# of Applications Disposed by Month Disposed and Timeliness

	January 2018		February 2018		March 2018		April 2018	
	Expedited	Non-Expedited	Expedited	Non-Expedited	Expedited	Non-Expedited	Expedited*	Non-Expedited

January 2018: Expedited 2,731 (12.3% / 87.7%); Non-Expedited 2,336 (17.0% / 85.0%)

February 2018: Expedited 2,585 (14.5% / 85.5%); Non-Expedited 2,327 (21.4% / 78.6%)

March 2018: Expedited 2,263 (12.2% / 87.8%); Non-Expedited 2,169 (22.1% / 77.9%)

April 2018: Expedited 2,374 (9.9% / 90.1%); Non-Expedited 2,000 (9.9% / 90.2%)

*Counts for April are preliminary

Legend: Not Timely | Timely

All data is preliminary and draft

Additionally, RIDHS is improving timeliness in the processing of recertifications in the month required.

SNAP Redetermination Efficiency

[Chart: "SNAP Redetermination Efficiency" — left axis values 0, 500, 1000, 1500, 2000, 2500, 3000, 3500, 4000; right axis values 0%, 10%, 20%, 30%, 40%, 50%, 60%, 70%, 80%, 90%; horizontal axis months Mar, Apr, May, Jun, Jul, Aug, Sep, Oct, Nov, Dec, Jan, Feb, March, April. Data labels: 13.8%, 12.6%, 20.0%, 59.6%, 65.9%, 57.7%, 58.2%, 67.4%, 57.1%, 71.5%, 80.7%, 66.2%, 70.7%, 77.1%. Legend: Processed Untimely, Processed Timely, Percentage of Timely Processed Cases]
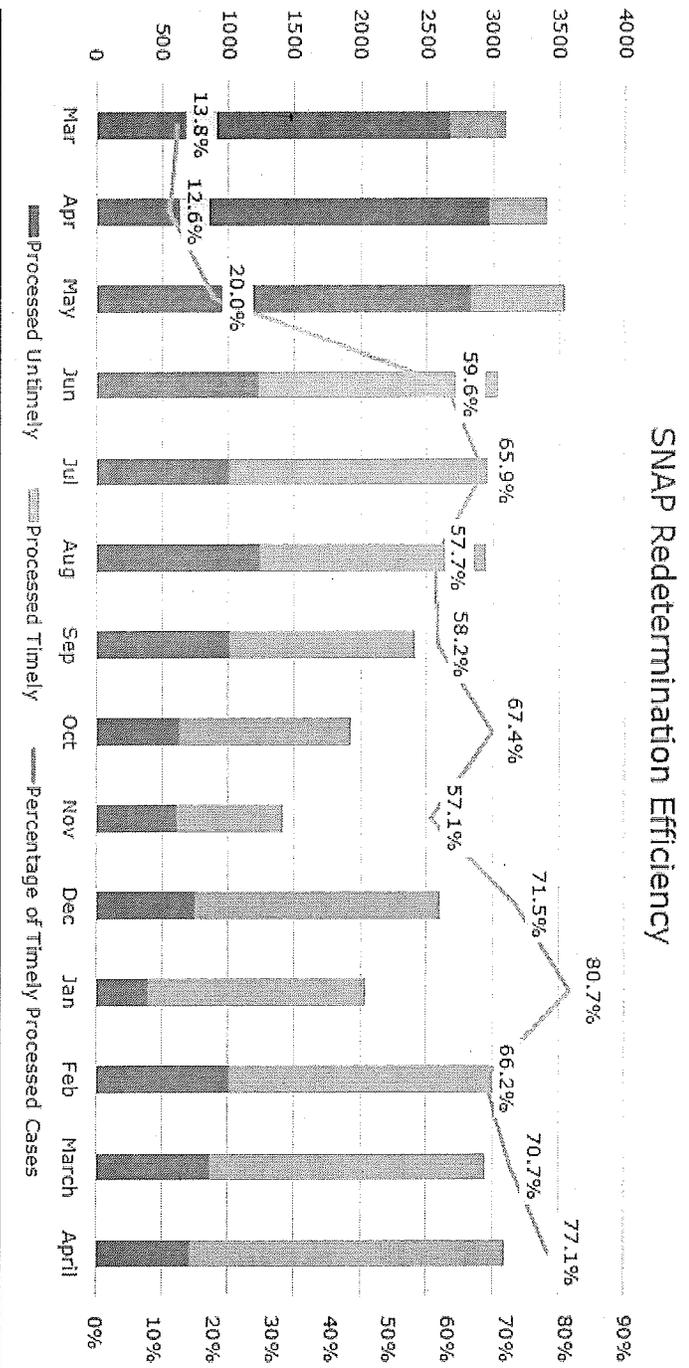
RI DHS is committed to processing recertifications, interim reports, and other case documents in a timely manner. Anytime any eligibility technician is working on a case, it processes all pending documents on that case. As mentioned above, this approached has helped reduce the pending backlog of unprocessed recertifications significantly in the last five months. Additionally, RI DHS is in the midst of bringing on contract staff to help process the backlog of pending case documents. The contract staff will help update cases with the changes reported in the interim and case change documents, while State eligibility staff will review and rerun eligibility on the cases. DHS projects working through this backlog as reflected in section 2.7 with all backlogged case documents processed by October 31, 2018. See Section 3.1 of the 5/15/18 Formal Warning Response related to additional system improvements made to improve timeliness of SNAP benefits.

Case And Procedural Error Rate (CAPER) (FNS discretion):

Per 275.16(b)(2) The State must provide Corrective Action when the State's CAPER is above the national average. The State should provide an update on its CAPER rate for months where the State has completed review of cases but have yet to submit data to FNSQC staff. FNS may request for updates even if the State is not above the national average, if the State's CAPER is of concern to FNS.

FNS Comment: The Case and Procedural Error Rate (CAPER) within a State is an indicator of customer service and access issues throughout the State Agency's certification process. The State's CAPER for FFY2017 (cumulative for October 2016-August 2017) was reported to be 71.28. Please provide the key drivers causing the high CAPER along with the State's plan to address the issues.

DHS Response:

Key Drivers Causing the High CAPER and Plans to Address:

1. Improper case closures resulting from incorrect data conversion

DHS and Deloitte are committed to cleansing the data in RIBridges to improve accuracy of eligibility outcomes inclusive of closures, as well as other case actions. Since RI Bridges went live and 10 years of historical case data was converted from the legacy system, DHS and Deloitte have implemented several improvements that have resulted in cleaner case data for ongoing SNAP case management.

For example:

- We cleaned up data to ensure more accurate eligibility determination and benefit issuance.
- Using data from the legacy system, we updated claim information to correctly reflect agency/client error and allow for a correct calculation of recoupment amounts and claim status.
- We fixed incorrect LIHEAP and heating/cooling information that was impacting individuals' ability to receive standard utility allowance (SUA). We then ran a mass update on the impacted clients to accurately issue SUA benefits.
- We reviewed converted SSI & RSDI benefit information and corrected RSDI benefit types to more accurately determine disability flags for individuals.
- We updated and synced address and residency information across portals to more accurately communicate with SNAP recipients via mail.
- We made data integrity updates to avoid application and case processing errors on screen.
- We updated Master Client Index (MCI) information, along with clients' SSN and alias information, so that HSRI and RIBridges tables are in sync and there are fewer application errors when workers are processing changes on converted cases.

Additionally, as part of the FPL update done in the Fall of 2017, DHS reviewed the outcome of running eligibility on the approximate 85,000 SNAP converted cases to determine if any closures were accurate or needed further review by a worker. This was done by running the SNAP caseload through the RIBridges eligibility engine in a test environment. Cases were then identified as: no change in benefits, changes to benefits, case closures, or cases pending worker action (e.g. a case change that needs processing).

Converted cases that had no change in benefits, as well as those that had changes or closures, were later processed in the production environment. Converted cases that required further worker review before being processed in production were left unchanged; they are being reviewed by workers as each case comes up for renewal.

Lastly, and most recently, RI DHS, Deloitte and Northrup Grumman worked over several months, to review the dates associated with all cases within the caseload. Nine categories of recertification/interim status were identified (e.g. recertified within in the last 9 months, within the 60-day certification window, within interim report window, etc.) and cases were identified as either simplified or change reporters. A review of all the dates related to each case was completed. The total caseload of 91,134 cases were reviewed. Of those 54,994 cases were identified as simplified reporters, with 49% of cases having a date changed within the system, of which 5,624 cases had their certification period end date altered. Of the 36,140 cases identified as change reporters, 34% required date alignment in the system, of which 5,233 cases had their certification period end date altered. In scenarios where the certification end date was changed, it was changed to comply with federal policy and align to their initial date of application or their last completed recertification, whichever was most recent. Recipients whose certification dates were aligned in that way were sent a notice to alert them to this change.

2.   Customer Service

The Call Center has experienced some attrition over the past year due to agency-wide staffing churn. As a result, DHS is currently in the process of hiring additional staff. The Call Center will open 14 positions under a new classification called Eligibility Technician II. This classification requires prior employment as an Eligibility Technician (ET) for a term of at least 18 months, and qualified candidates are expected to have a higher level of knowledge and skills regarding both programs and system navigation. Because of the nature of inquiries to the Call Center (which often include cases with systematic problems), as well as the need for workers to have excellent customer service skills, a more advanced level of expertise is needed.

Extraordinary customer service and same day service are two operational goals RI DHS strives to achieve daily. The DHS – Deloitte joint work group identified a path and timeline to remove impediments and move closer to our goal. Front office improvements will enable staff to register or associate applications, scan documents and schedule appointments on day of application. Thirteen (13) new scanners will be installed in June. Scanned documents are auto indexed using a cover sheet containing customer's metadata QR code and Smart Separators by document type. Each office will complete these activities on-site. Time is saved during auto indexing. Additional time is saved by completing all tasks on-site. This

combines to reduce opportunity for error and allow the greatest number of days for processing. Customer can receive service and move through office faster.

Additional Customer Service Concerns

Call Center / Long Wait Time - Staffing Strategy

The RI DHS Call Center is currently composed of 26 staff: nineteen (19) Eligibility Technicians, one (1) clerk, one (1) Senior ET, two (2) Supervising Eligibility Technicians, and one (1) Senior Casework Supervisor. A Call Center Manager and the Deputy Director, Policy and Operations oversee the Call Center's operations.

RI DHS has completed initial recruitment efforts consistent with terms in the Special Purpose Agreement and had 5 DHS Eligibility Technician II's that started May 14th in addition to adding a third Supervising ET to manage and coach the Call Center staff. We'll continue to recruit interested staff and once the proposed job descriptions are through the public hearing process we'll post the remaining open positions for DHS Eligibility Technician II and convert the staff who applied and began in May to permanent DHS Eligibility Technician II positions.

3.   Process Improvements

RI DHS is committed to evaluating and improving business processes as part of our commitment to continuous improvement of our customer's experience. A full "end to end" review of departmental processes is underway.

Business Process Redesign- First, RI DHS has contracted with Public Consulting Group (PCG) to support the Department's business process redesign efforts with a critical focus on lobby management practices. More information about this process is included in the 5/15/18 Formal Warning Response.

Eligibility Technicians in the Call Center are responsible for:

- Processing new applications (only when a signature is viewable in the eligibility system)
- Processing Recertifications
- Processing Interims
- Processing change reports
- Determining eligibility
- Conducting interviews
- Requesting and processing verification documents
- Notifying clients of their benefit status

- Relaying general SNAP information
- Helping with notices

There is also at least one Eligibility Technician assigned per day to "coverage" tasks. The ET working on these tasks does not take incoming calls, but rather works on cases that may require additional actions once the call has concluded.

The Senior Case Work Supervisor and Supervising ETs are all responsible for managing the work of the Call Center. They ensure ETs are each assigned to various queues in the VCC to accept incoming calls. The queues are organized by program type and language and the ETs are assigned to them based on their knowledge and training. The supervisors are also responsible for helping ETs troubleshoot issues and for escalating cases to the proper department personnel when necessary. They also complete supervisory duties in the Eligibility System, such as manual issuances, overrides, and approvals. In addition, the supervisors manage and distribute any work resulting from lists the AHS Triage team collects on a daily basis. These lists include: missed SNAP appointments, EBT card requests and case closures.

RI DHS is in the process of seeking FNS approval to implement the use of a private company to augment and enhance current staffing levels and structure to provide basic case-specific information that is readily available in the system to a SNAP applicant or participant, such as application or case status, benefit issuance date, and status of submitted verifications. RI DHS believes this flexibility will provide improved customer service, reduce applicant and participant wait times, decrease workload on merit personnel staff, allow for better coordination across multiple human service programs.

With FNS approval, RI DHS would like to contract with a vendor for an initial four (4) months of targeted work, to assist RI DHS with completing address changes in the system, data entry of reported changes from customers and interface matches, and to taking live calls from the Call Center specific to the services described below with FNS approval:

1. Handling Complaints (non-case specific)
2. General information on SNAP program, local offices and referrals.
3. Taking requests to replace forms and letters, including requests for blank new applications
4. Scheduling and rescheduling applications
5. Provide the following read-only information from the system -case and application status, receipt of documentation, benefit amount and date, case denial reason.

The Triage agents will be offering all callers the option of a Call Back vs. entering the queue after initial triage takes place. We asked the Vendor to add this capacity in their proposal as their hours of operation are longer than RI DHS's office hours and we felt the option could be explored as our work progresses. For callers who opt to have a Call Back vs. waiting in the queue for these scenarios, RI DHS would send Call Back list to the Vendor.

The Vendor we are interested in has expertise in connecting clients and their constituents through seamless transactions on a massive scale across all BPO areas, including document processing for health and human services operations. They have extensive experience in providing and managing document processing for large clients including federal and state governments and commercial programs. The Vendor, with its expertise and extensive experience, recognizes that unworked documents and/or cases puts RI's most vulnerable citizens at risk.

4.   Lobby Upgrades

In addition to the PCG engagement, an interdepartmental taskforce was formed in November 2017 that includes staff from the Governor's Office, Division of Capital Assets Management and Maintenance (DCAMM), DOIT and RI DHS. This taskforce walked through and observed the six (6) primary DHS offices. RI DHS supervisors and key internal stakeholders were surveyed to identify obstacles and processes for improvements. Because of these efforts, the Providence, Warwick and Woonsocket offices removed unneeded furniture from their lobbies, allowing the queues to be redirected; customers now enter faster and move through lines quicker. A second lobby was opened in Providence. The lobby is staffed with customer service aides and eligibility technicians capable of addressing all SNAP related business. The Providence office opens the lobbies at 8:00am to greet customers and identify needs a half hour before standard operating hours. The two largest volume offices, Pawtucket and Providence, added eligibility staff to the front desk.

Currently underway, both Wakefield and Warwick are reconstructing front desks to add additional customer service windows. Woonsocket is relocating its greeter station to reduce congestion when entering the office. Pawtucket and Providence are repositioning greeters and scanning and indexing stations to expedite customer service.

The task force recommended the installation of a queuing system. DHS leadership evaluated pros and cons of the system utilized by the Rhode Island Department of Motor Vehicles. RIDHS is obtaining quotes for installation and maintenance of a queuing system.

5.   Worker Inbox Impact

The State is working on developing and implementing a triage and work prioritization plan to tackle expedited cases, pending applications, and recertifications. While no one technological fix exists to improve the State's comprehensive operational performance, the introduction of a new Worker Inbox (WIB) represents a significant technological improvement that the State believes will continue to enhance the efficiency of SNAP case processing.

The WIB was re-designed in late 2017 and early 2018 to meet core business requirements that have been codified with the DDI vendor in the functional design document.

The State expects the following improvements based on full implementation of the worker inbox:

- Improved efficiency from the retirement of paper lists, to come from better data tracking and KPI measurement, task prioritization and ease of navigation for workers.
- Reduced variation in processing based on slower assignment of paper lists and better tracking of daily worker performed.
- Increased ability to "work the whole case," including case changes and other alerts which are more cumbersome to work on a list.
- Improved timeliness from organizing work more specifically across lists and automatically highlighting cases that are about to become overdue through the worker and supervisor dashboard.
- Improved management visibility in to task assignment and staffing needs; work assigned and work performed currently must be tracked by hand. More worker inbox functionality and data will reduce the burden on supervisors and provide ready-to-analyze information.

6. Notices

Since the roll out of the new eligibility system, notices have been problematic. Proper communication to clients regarding the expectations of SNAP applicants, on-going eligibility, and eligibility determination is integral to the work of administering the Supplemental Nutrition Assistance Program. Prior to and since the transition to the eligibility system, RI Bridges, the Department has worked internally and with community partners to improve readability of our notices. Since the transition to RI Bridges, our efforts to improve notices has also required extensive work to ensure the accuracy of our communications with clients.

The notices team meets weekly to discuss notices needing improvement across all programs and is actively communicating and engaging with the SNAP team to be certain all proposed improvements are agreed upon and being tracked and prioritized collectively. Additionally, as other changes are made to RI Bridges that require changes to notice text or triggers, we are taking the opportunity to review propose other improvements to the entire notice at that time.

A dozen SNAP notices are top priorities and are in the process of being improved with our vendor or are scheduled to be improved over the upcoming months. Included in those priority notices are the Benefit Determination Notice, Notice of Adverse Action, and Recertification forms as well as multiple ABAWD-related notices. More information about notice improvements is included in the 5/15/18 Formal Warning Response.

Modernization efforts (FNS discretion):

The State should include any updates on new information not previously shared to FNS on the status of modernization efforts or changes to business processes. This might include implementation of call centers, task based case processing, mobile apps development, online SNAP application, changes to policy, etc.

FNS Comment: *FNS recognizes that some of these efforts will be addressed in the Formal Warning response due to FNS by May 17, 2018.*

Rhode Island Semi- Annual Corrective Action Plan – May 2018

DHS Response:

As stated in the 5/15/18 Formal Warning Response, the following technology improvements have been made:

1. Completed SNAP work

Since the RIBridges system went live in September 2016, DHS and Deloitte have implemented 30 releases to stabilize the system, enhance its design, fix defects, and significantly improve the timeliness of SNAP benefits. Some highlights include:

- We have added new functionality to streamline and expedite application processing, reduce the backlog of overdue SNAP applications, and increase the accuracy of eligibility determinations and payments.

- Due to a focused effort on consistent and stable system operations, the number of new and existing incidents (when the system does not operate as expected) has been declining steadily. Open incidents have declined 73% since December 2017.

- As previously mentioned, SNAP application timeliness also continues to improve. In April 2018, SNAP benefits were issued timely to nearly 90,000 households and 90% of new SNAP applications were processed timely – a nearly 10% increase over the previous month. The number of applications not processed timely continues to represent less than 1% of the SNAP population receiving benefits.

- The number of SNAP cases worked per worker, per day, has doubled and overdue applications that can be worked by a DHS worker have been reduced from 780 to just 13.

- System productivity is also increasing. Eligibility checks have tripled since RI Bridges launched.

- We have also made important system enhancements to improve the user experience for both workers and RI residents.

For workers, we have:

- made it easier to process multiple verifications for a single case
- eliminated the need to run eligibility just to update addresses and e-mails
- trimmed the number of data fields and simplified reporting logic to a direct question, reducing the potential for mistakes that can impact benefits
- added in-line validations to make it easier to correct and update information during case processing
- enhanced the MCI clearance process to use all criteria, not just SSNs, to accurately match individuals with cases
- eliminated the need to fully process a case before withdrawing the application for interview no-shows
- enabled them to add a program to an existing case, without completing a full application registration
- made operational improvements in field offices that are reducing the application backlog

For RI residents, we have:

- made it possible to submit a SNAP application in the Customer Portal without having to answer questions about other programs
- limited the questions they see and answer to those that are SNAP-related
- aligned the expedited screening processes in the customer and worker portals to ensure that expedited tasks are properly generated from the customer portal

Deficiencies identified by the State (through ME process or otherwise)(required):

Per 275.2(a)(i) the State must include issues that have been identified by the State that has not been previously reported to FNS. These issues may come from the State's internal ME process, QA process or other means. Include Document Processing Backlogs and Significant State ME findings. The State should include detailed information comparable to the CAR tool to include identified root causes and CA steps.

FNS would then review the information provided by the State and provide comments, questions and/or approval of the CA steps detailed by the State via FNS' response to the State semi-annual CAP. In its response, FNS will provide a unique identifier to the issue. FNS will utilize State Identified Issue (SII), Fiscal Year, and a number to identify issues. For example: if the State completes a CAR tool for an issue FNS is not yet aware of, in subsequent correspondence FNS will name the finding: SII 19.1 if found in FFY 2019. The issue would then be included in the State's semi-annual CAP tool.

DHS Response:

Any issue not already captured in this document is outlined in the 5/15/18 Formal Warning Response along with the root cause and CA steps.

Client Complaints(required- at least annually):

Per 7 CFR 271.6(a)(3) please provide an update on the State's analysis of client complaints. The regulation requires an update once a year, but FNS would appreciate it if the State provided an update in each semi-annual CAP.

FNS Comment: During the State Program Access Review (SPAR) conducted in March 2018, the State reported that this process is being refined to streamline the referral process which includes a newly appointed point of contact for the agency. FNS requests that the State provide the required yearly update but encourages the State to also include an update on planned corrective actions in this document. Please note, that this is also an open finding from the FFY2017 SPAR with a corrective action plan provided by the State and under review by FNS.

DHS Response:

The Department continues to address and refine the complaint tracking process. Currently, a Customer Relationship Management (CRM) tool is used to track constituent inquires. Inquiries are received regarding case issues for all programs including SNAP. The issues are sent to escalation teams to be resolved.

One issue that should be noted is that the current tool does not track the issue down to the specific topic that the customer/ client was inquiring about. The Department is continuing to resolve this tracking issue to the level that satisfies the FNS and Department's goal of receiving and being able to formally analyze the inquiries and develop a reporting and corrective action tool. The Department's goal is to establish a clear, concise and sustainable methodology for receiving, tracking and resolving client complaints and inquiries to all SNAP issues.

A formal tool and procedure is expected to be operationalized before the end of the summer, 2018. Once data is available in the system for a designated period, the data will be analyzed for trends and an appropriate corrective course of action will be developed. The results will be shared with FNS.

Audits(A133, OIG, GAO & Other audits)(required):

Per 275.16(b)(3) the State must provide Corrective Action for all findings related to A133, OIG, GAO or other audits.

FNS ME Open Findings Table:

Per 275.16(b)(3) the State must provide updates to CA steps detailed and agreed upon previously during the CAR process for each open finding. The table will include the finding name, finding language, CA steps identified, updates to the CA steps, the State Point of Contact for each finding, bullet for each of documentation provided, and a status code for each finding noting whether the finding is "O" for still open or "RV" ready for validation because all Corrective Action steps have been taken. Noting a finding is "RV" would flag the finding for FNS. FNS will then work to validate the CA so the finding can be closed. FNS will highlight rows of repeat findings in red. Repeat findings require immediate attention and may require escalation.

NERO SNAP will highlight row in red if deemed a repeat finding. Repeat findings require immediate steps taken to resolve issue and may require escalation.

Finding Name	Finding Language	Steps to CAP	Update on each item	Documentation	State PoC	Status
ABAWD			**Able-Bodied Adults without Dependents (ABAWDs)**			
			Local Program Access (LPAR)			
LPAR 15.1 *formerly Finding #L.1 –(Open)- in the FFY17 review* *(This was a finding from the FFY 2015 Newport LPAR review)*	Notice of Adverse Action does not comply with Federal regulations	SA must ensure the language included on the NOAA is compliant with 273.13(a)(2) by explaining in easily understandable language an accurate reason for the proposed action. System issues appear to account for the majority of the NOAA issues; however, in some instances the worker might have taken an incorrect action in the system that resulted in an inaccurate NOAA. The State must provide an update on system defects related to NOAAs. The State must provide a comprehensive training for all eligibility staff on correct notice procedures in RIBridges.	As noted in the Department's 5/15/18 response to FNS: We implemented a Notice of Adverse Action that also acts as a renewal reminder in September 2017. Since that time, this reminder has been sent 15 days prior to the end of the certification period. This summer, that notice will be updated to be more specific to where a recipient is in the renewal process. For example, following this update, the notice which currently reads, "you have either not returned your packet or your renewal has not been processed" will be personalized so that individuals who have not returned a packet will receive a notice stating that, and those who have returned a packet but have not completed the interview, will have that stated in the notice. The intent in personalizing the notices is to help our clients better understand what actions they need to complete in order to	Copies of the Quick Reference Guides are in draft form and will be shared with FNS under a separate correspondence.		O

		have a benefit determination made. With regards to training, The Center for Staff Development and Learning (CSDL) does not have specific training focused on correct notice procedures for RIBridges. However, the program training curriculums do cover the topic during the system portion of the trainings. In addition, there are Quick Reference Guides and User Guides that are available to staff members on the RIBridges Online Help. Currently, CSDL is working with Deloitte to update these job tools.		
LPAR 15.2 *formerly Finding #A.2 (NOMI) (Repeat):	Failure to appropriately issue the Notice of Missed Interview (NOMI)	The SA must ensure that it is issuing NOMIs in accordance with Federal regulations. The issues identified during the review appear to be a combination of both system-related errors and worker errors (which themselves are likely the result of workers learning to navigate the new system). The SA must investigate and address the root cause(s) of the system issues and	The Department has made updates and corrections to the NOMI process and has provided reference guides for the staff. The new staff are trained in SNAP and in the system and existing staff are maturing in the system operations. The issues initially seen and noted in this CAR have been significantly reduced. There were issues with the staff scheduling appointments and not specifically checking off "SNAP." In failing to do so, the	O

	provide targeted training to eligibility staff.	appropriate triggers were not engaged to send the NOMI when the client did not attend the appointment. Staff have been reminded during huddles regarding this process. Additionally, an open ticket, RIB-75743 addresses the issue for staff being able to update the appointment screen in order to trigger a NOMI in certain circumstances. This ticket is going through the prioritization process. With regards to training, The Center for Staff Development and Learning (CSDL) does not have specific training focused on correct notice procedures for RIBridges. However, the program training curriculums do cover the topic during the system portion of the trainings. In addition, there are Quick Reference Guides and User Guides that are available to staff members on the RIBridges Online Help. Currently, CSDL is working with Deloitte to update these job tools.	
LPAR 15.3 * formerly Finding	Applications are not processed within 30 days	The SA must ensure that all applications are processed within 30 days as required. Eligible applicants have the	As of April 2018, the state agency is reporting that 90.1% of expedited and 90.2% of non-expedited applications are being	Artifact #4 State's 5/15/18 response to FNS
				O

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
#A.4 *(Repeat):*			right to receive benefits within 30 days under normal processing standards. Additionally, ineligible applicants must be notified of their ineligibility no later than 30 days after the date of application in accordance with 273.2(g)(3).			
			The State acknowledges that some of these 9+% untimely cases may have been processed late in the 10 or 30-day time frame, limiting the time the client must respond to the request for documentation. Combined timely processing for the month of May 2018 was 93%.			
State Program Access (SPAR)						
SPAR 15.1	Notice of Required Verification does not conform to Federal regulations –(open) *(This is an open finding from the FFY 2015 State Program Access Review.)*	The SA must revise its Notice of Required Verification to provide an explanation of the period of time that the requested verifications should cover.	The Department is currently reviewing the Notice of Required Verification for compliance with the federal regulations and will take appropriate action to correct any deficiencies if found. The Department will notify FNS if any issues are discovered and the progress as it made as necessary if warranted. The current DHS -2 application and the "Additional Documentation Required (ADR)" notice have lists of required documents. The Department is	Artifact #5 RI DHS 2 application Artifact #14 Verifications Page from Renewal Form	O	
*formerly Finding #S.1 Federal regulations included in the FFY17 review						

SPAR 15.2	The SA must ensure that all	Scanning	Artifact #4 RI DHS	O
*formerly Finding #S.2 –(open) included in the FFY17 finding from the 2015 State Program Access Review.)	SA Fair Hearings exceed federally mandated time limits	fair hearings are scheduled, conducted, decided and all parties involved are notified of the hearing decision within 60 days from the date of the request. The SA must also ensure that the fair hearing case files are adequately document when all parties are notified of the hearing decisions.	DHS has purchased additional new scanners to be used in the field offices. Hearing Requests that are received in the local field offices are scanned into Bridges creating an appeals task. This is usually done on the same day that the appeal request is received. This results in quicker processing of rather than sending the appeal requests to central scanning for processing which had been done in the past.	response 5/15/18 tó FNS	
	(This was an open review		**Staffing** Additional staff members have been assigned to work appeals. The Providence Office has one additional ET assisting with appeals, and the special project unit now has one ET working current appeals in addition to those working on the back log of		

| | | exploring adding, "most recent" and "current" to the items to meet the requirements of the regulation. However, the list of items to provide to DHS for verifications has remained consistent since FNS reviewed and approved this format of this DHS 2 application. | | |

appeals. In many offices, the agency response to the hearing request is completed on the day the hearing request is received in the office. Other offices are completing this task and sending the hearing request to the hearing office within the seven days allowed by policy.

Additional Hearings Scheduled
As the hearing office has hired one additional hearing officer, more hearings per week are now being scheduled. The Providence Office has increased from two hearing days per week to four days of hearings per week.

Quarterly Staff Meeting
At the Quarterly Staff Meeting held in March 2018, much attention was given to the appeal process including training on the informal resolution process and use of the worker's inbox in Bridges. Workers were instructed to process any appeal tasks found in the worker's inbox whenever working on a case for any reason. The informal resolution process was discussed in detail and workers were instructed to make all attempts to correct any case

errors and to contact customers concerning their hearing requests prior to the actual hearing. All staff members were required to attend the Quarterly Meeting.

RI Bridges
There are upcoming improvements in the worker's inbox and development of an appeals dashboard. The dash board will provide information to both the appeals office and DHS field staff to improve tracking of appeals in the Bridges System. The current anticipated availability and use of these improvements is in June 2018 and July 2018.

Training
The Center for Staff Development and Learning has been working on Quick Reference Guides and a RI Bridges Training on Appeals for DHS Staff including a Student Guide to assist staff members in using Bridges to process appeals. Deloitte staff is currently training all DHS staff on the new workers' inbox.

Special Projects Unit
The special Projects Unit continues to make great

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
			progress on our back log of appeal requests. Most cases are resolved by the informal resolution process and case correction resulting in the SNAP participant withdrawing their request for a fair hearing with the Appeals Office.			
Electronic Benefit Transfer (EBT)						
EBT 15.1 *formerly an EBT Card finding #1)*	Requests to Replace	1.Establish one call card replacement procedure. 2. Provide updated FIS customer service scripts and documentation describing the process of automating the card replacement process along with the implementation timeline.	1.The State is currently conducting a one call card replacement request process. 2. The customer calls the one number for the Department's Call center: 1-855-697-4347. The very first prompt directs the caller who wants to report a lost/ stolen / damaged card to press 1. This directs the caller to the FIS call center. The client can enter the card number or state that the EBT card is missing, lost, stolen or damaged. The call is then directed to a person. The card is immediately cancelled and a list of requests is generated on a report for the RI DHS EBT coordinator. A new card is requested through the	Call center call to verify	RV	

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
EBT 15.2 (*formerly finding (#2)	Reconciliation and Reporting	1. DHS should continue to work with FNS to resolve all reporting issues.	Bridges system and mailed to the client within 2 business days.			O

Treasury Offset Program (TOP)

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
TOP 14.5 *formerly finding #5 (open) (This was an open finding from the FFY 2014 Treasury Offset Program (TOP) Review.)	Failure to properly determine delinquency date.	DHS must accurately determine and record the delinquency date for households that do not respond by the demand letter due date; for clients who request a fair hearing where the claim is upheld; for clients who undergo recoupment; and for clients who enter an acceptable repayment agreement and then subsequently miss a payment. DHS must ensure that delinquency dates remain the same in demand letters as on signed repayment agreements. Finally, a procedure must be developed to ensure dates are consistent in paper files and electronic systems. The new procedures must be	The RI DHS continues to work with the vendor, Deloitte and with FNS to bring the CCRU functionality, including TOP, into production. The anticipated "go live" for the CCRU software functionality is currently scheduled for the end of the 2018 calendar year. The TOP process referrals are on hold until further notice per FNS guidance to the Department. In the meantime, the unit is working to gather case data manually with the goal being able to have data to enter into the system from a spread sheet when the functionality becomes available in RIBridges. This includes determining the correct delinquency date. The CCRU staff are all virtually new to the CCRU process and have been working with the training	TBD	O	

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
	submitted to FNS for approval.	unit as well as with FNS and have been reviewing federal regulations to get the staff fully trained in all aspects of the collections process in anticipation of the system CCRU functionality being live in production.				
Claims						
Claims 15.1 *formerly finding # 1 (open)	RI DHS has a significant claims backlog. *(This was an open finding from the FFY 2015 Recipient Claims Review.)*	DHS must provide FNS with specifics on the extent of their claims backlog including a copy of their tracking system. The tracking system must be able to track the number of claims received, the timeframe (days) it took to process the claim and the number of claims that are exceeding the 180-day timeframe. DHS must provide FNS with an action plan for resolving the claims backlog and implementing a tracking system. DHS must monitor and report their backlog to FNS.	The CCRU unit is currently reviewing the backlog of claims from before go-live and is entering the data onto a spread sheet. When the CCRU system functionality is in production, the unit plans to be able to enter the data from the spread sheet into the system without having to re-review the cases. The current referrals in the RIBridges system will be reviewed. The RIBridges system process of making the referrals is being reviewed for correct triggers. Currently, any apparent over payment, regardless of validity, is electronically referred to the CCRU. This may be creating additional work reviewing cases that should not	An excel file list with confidential information of the backlog cases that have been logged is available and will be shared with FNS upon request through secured means.		O

Finding Name	Finding Number	Steps to CAP	Update on each item	Documentation	State PoC	Status
			Integrity			
Report issued to the State March 21, 2018.	Claims 15.3 *formerly Finding # 3 (open) (This was an open finding from the FFY 2015 Recipient Claims Review.)	Inaccurate Date of Discovery used The SA should provide the most up-to-date definition of the Date of Discovery which the State is opting to use for FNS review and approval.	have been referred for collections. System functions are currently scheduled to be available before the end of calendar year 2018. Since the 2015 review, as FNS is aware, the State has a new IES. The claims portion of the IES in not yet in production. The Department is reviewing the functionality of each section of the claims functionality, to include the "Date of Discovery" fields. It is planned that the page field will be used by the collections staff once a date of discovery is established. Once entered by the CCRU staff, the date can only be set, adjusted or modified by CCRU staff as appropriate and the field office staff will not be able to adjust or set this date.	Integrity Report CAP response is under review and will be submitted to FNS.		O CAR is due from the State by May 21, 2018. FNS does not

Audits (A133, OIG, GAO & Other audits)					expect corrective actions for these Integrity findings to be in this semi-annual CAP at this time.