



JUL 31 2018

United States
Department of
Agriculture

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

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

Dear Director Hawkins:

The Food and Nutrition Service (FNS) has completed its review of Rhode Island's Unified Health Infrastructure Project (UHIP) responses to FNS's conditions imposed on the Federal Fiscal Year (FFY) 17 and FFY 18 quarter 1, 2, and 3 Implementation Advance Planning Document (IAPD) Update and As-Needed documents. FNS has also reviewed Rhode Island's responses to the conditions imposed as part of its approval of Rhode Island's Amendment #44.

FNS has determined the status of these conditions to be as follows:

IAPDU FFY 18 Q1 Original Condition 1 -

Provide detailed reconciliation of functionality delivered and costs for design, development, and testing for ABAWD, eDRS, Mass Benefit Replacement, NDNH, Disaster SNAP, and Claims Processing. This documentation must include the dates of:

- a. Receipt of Deloitte deliverables
- b. Rhode Island acceptance and payment for same

We have reviewed progress to date against Condition 1 and have the remaining requests:

1. Provide a written summary of the ability to provide, or not provide, the documentation originally requested.
2. Please confirm that ABAWD, Mass Benefit Replacement, and NDNH are complete and functioning with the implementation dates, and that no defects exist.
3. D-SNAP, eDRS, and Claims are all in some stage of development; please provide the most current status of each.

FNS July 30, 2018 response to IAPDU FFY 18 Q1 Condition 1 -

FNS is removing this condition as compliance with this requirement is now being tracked through the Formal Warning Corrective Action Plan (CAP) and the State's submission of its road map, release plan updates and testing results as the functionality continues to be developed. This condition stemmed from FNS's original July 25, 2016 conditional approval letter and its March 15, 2017 letter. FNS's decision regarding this condition applies to these conditional approval letters as well.

IAPDU FFY 18 Q1 Original Condition 2 -

Documentation of fixes to be covered under Deloitte CA 39 – Warranty for Release 7 through February 2017. Post-implementation status calls and reports indicate that defects that had been fixed and tested are continuing to reappear. A comprehensive list of all defects fixed under warranty, including the release date, should be submitted.

FNS July 30, 2018 Response to IAPDU FY 18 Q1 Condition 2 -

FNS is removing this condition as compliance with this requirement is now being tracked through the Formal Warning CAP and the State's submission of its road map, release plan updates and testing results as the functionality continues to be developed. This condition stemmed from FNS's original July 25, 2016 conditional approval letter and its March 15, 2017 letter. FNS's decision regarding this condition also applies to those conditional approval letters as well.

IAPDU FFY 18 Q1 Original Condition 3 -

RI must show progress toward determining the root cause analysis of all critical defects, as well as toward addressing any major functional deficiencies that are identified and require immediate action

FNS July 30, 2018 Response to IAPDU FFY 18 Q1 Condition 3 -

FNS considers this condition to be met as the State's Independent Verification and Validation reports and executive status reports from April to June 2018 have shown a reduction in the number of cases without root cause analysis performed. FNS will continue to monitor the State's progress in determining root cause analysis through using other methods such as reviews of the executive status decks, state calls, and the CAP.

IAPDU FFY 18 Q2 Original Condition 1 -

The State must provide a detailed list of the system changes and fixes that will be used to determine if the system is fully compliant by February 16, 2018.

FNS July 30, 2018 Response to IAPDU FFY 18 Q2 Condition 1 -

FNS considers this requirement to be met. The State has shared with FNS the lists of system changes and fixes identified in order to achieve federal compliance and stabilization. The State is reminded that it should continue to submit updates and/or updates to this list to FNS for our files and potential review.

IAPDU FFY 18 Q2 Original Condition 2 -

The State must provide FNS with a breakout of the entire project budget by FFY, quarter, and cost type/center for the entire project. The budget must include actual and estimated costs to date and follow the requirements of HB 901 section 3.5.2.1.

FNS July 30, 2018 Response to IAPDU FFY 18 Q2 Condition 2 -

FNS revised this request in IAPDU FFY 18 Q3. Please refer to *FNS Response to IAPDU FFY 18 Q3 Condition 3* for the current status of this condition.

IAPDU FFY 18 Q3 Original Condition 1 -

FNS requests that RI provide a written statement signed by the authority with the ability to commit the State, acknowledging its understanding and willingness to comply with the federal requirements for procurements that exceed the FNS threshold for review. This letter should include a commitment to comply with FNS's review time standard (sixty days each time a document is submitted or resubmitted). This letter along with an updated version of the UHIP procurement tracker must be submitted by 4/30/18. After this date, monthly updates to the tracker must be provided.

FNS July 30, 2018 Response to IAPDU FFY 18 Q3 Condition 1 -

FNS considers this condition met upon receipt of Rhode Island's April 30, 2018 procurement compliance acknowledgement by Secretary Beane and upon receipt of its monthly procurement tracker updates. FNS has found this tracker to be extremely useful and requests that the State continue to submit the tracker monthly for the duration of the project.

IAPDU FFY 18 Q3 Original Condition 2 -

The State must provide a detailed list of the system changes and fixes related to SNAP functionality that will be included in the April, May, and June releases. The release plan must be submitted by the 15th of each month before the release is scheduled to occur.

FNS July 30, 2018 Response to IAPDU FFY 18 Q3 Condition 2 -

FNS considers this condition to be met upon the State's submission of its road map, release plan updates and testing results as the functionality continues to be developed. However, this decision is contingent on the State's timely submission of these updates for FNS review and inquiry.

IAPDU FFY 18 Q3 Original Condition 3 -

The State must provide FNS with a breakout of the entire project budget by FFY, quarter, and cost type/center for FFY 17 to the present by May 1, 2018 as part of its FFY 18 Q4 IAPDU submission. The budget must include actual and estimated costs to date and follow the requirements of HB 901 section 3.5.2.1.

FNS July 30, 2018 Response to IAPDU FFY 18 Q3 Condition 3 -

As part of its April 30 2018 IAPDU Q4 submission, the State submitted a revised budget for FFY 17 with a breakout of the entire FFY budget by FFY, quarter, and cost type/center for FFY 17. Upon review of this submission FNS approves of the following amounts for FFY 17:

FFY DDI Costs	SNAP FNS Share @3.52%	SNAP FFP @ 50%	Actual or Estimate
FFY 2017	\$667,426	\$333,713	Actual

The total actual project costs for Design, Development, and Implementation (DDI) for FFY 17 are \$30,274,666, of that amount \$18,960,943 include cost categories that include the use of SNAP funding.

The State is reminded that each IAPDU going forward must include the breakout of the entire project budget by FFY, quarter, funding source, cost allocation percentage, and cost type/center from FFY 17 onward.

IAPDU FFY 18 Q3 Original Condition 4 -

Rhode Island must provide FNS with a copy of the new executive reporting framework by April 30, 2018.

FNS July 30, 2018 Response to IAPDU FFY 18 Q3 Condition 4 -

FNS has received a copy of Rhode Island's revised executive reporting framework on April 29, 2018. The revised reporting framework continues to be submitted to FNS on a weekly basis and satisfies the intent of the condition.

Deloitte Contract Amendment #44 Original Condition 1 -

Rhode Island must provide FNS with an organizational chart identifying the individuals assigned to collect funding for unanticipated or additional unanticipated costs. It must also include the value of funds collected as an additional line item to all cost centers affected on future Implementation Advance Planning Document Updates. Line items should be broken out by cost center, fiscal year, quarter, actual vs. estimates, and indicate deductions in costs for the line items affected where appropriate.

FNS July 30, 2018 Response to Deloitte Contract Amendment #44 Condition 1 -

FNS considers this condition to be met. The State must continue to report credits in FNS 778 column 6-7 APD Development and/or Operations, and provide an attachment to its IAPDUs that provides a breakdown of budget vs. actual expenditures by quarter, program, cost center, and fiscal year, and by invoice type (M&O or DDI), until all funds available under the credit amendment are exhausted.

The State's submission of its updated organizational chart on April 19, 2018 was included in FNS's determination of the State's compliance with this decision as well. FNS requests Rhode Island continue to share a copy its organizational chart revisions for our records.

Deloitte Contract Amendment #44 Original Condition 2 –

The State must include any reimbursement for payments made by the State for fines and/or penalties imposed by FNS in its subsequent IAPDUs. If the payments received do not affect a specific budget line item under UHIP, the State should include those payments in a separate table that identifies the payment and its use. As with the requirement for condition 1, these payments must be broken out by quarter, fiscal year, and by actuals and estimates.

FNS July 30, 2018 Response to Deloitte Contract Amendment #44 Condition 2 –

This condition is still considered to be unmet as the State has not been reimbursed for State fines and/or penalties at this time.

Deloitte Contract Amendment #44 Original Condition 3 –

Rhode Island must show progress toward implementing updates to the Service Level Agreement (SLA) and includes Key Performance Indicators (KPI) to its Integrated Eligibility System contract with Deloitte. The amendments necessary to implement these enhancements, contract amendments (CA) #45 and #46, must be submitted at least 60 days prior to their potential date of execution.

FNS July 30, 2018 Response to Deloitte Contract Amendment #44 Condition 3 –

This condition is considered met. The State received approval for CA #45 and #46 on April 13, 2018 to implement these necessary performance measurement enhancements. Rhode Island has also continued to work with Deloitte to refine this criteria. While this condition is met, FNS will continue to monitor the State's use of its SLAs and KPIs to hold its vendor accountable. As a reminder, any changes to the State's performance metrics plans, measurements, or enforcement of its vendor's compliance must be continue to be shared with FNS.

We continue to work with the State with regard to RIBridges stability and provide technical assistance as needed. Please contact either Bonnie Brathwaite, Northeast Regional SNAP Director, at 617-565-6397, or Dawn Bartolomeo of the FNS State Systems Office at 415-744-3774 or dawn.bartolomeo@fns.usda.gov with questions or comments.

Sincerely,



Kurt Messner
Regional Administrator
Northeast Region

cc: Matt Stark
Iwona Ramian
Ben Shaffer