RI FFY 2018 LPAR & SPAR Corrective Action Response

As stipulated in 7 CFR 275.3 and 275.16, Rhode Island is required to provide a written response identifying its corrective actions outlined in this ME report. The Corrective Action Response (CAR) is due within **60 calendar days** of the date of this ME report. Please complete each element of the CAR tool detailed below.

Finding Naming Convention

FNS will assign each finding a unique identifier following the naming convention below in the ME report.

- The type of review: LPAR, SPAR, MESYS, ABAWD, ET, SNAPED, INTEG, QC, CAPER, EBT, QCSTATS, CLAIMS, TOP
- The last two digits of the FFY the review took place in where the finding was identified: e.g. if a finding resulted from a review in FFY 2017, (17) would be the first two digits in the finding name.
- Finally, a number (1, 2, 3, 4) assigned by FNS that would stay with the finding until it's closed.

For instance, if a State has a combined LPAR/ABAWD review in FFY 2019, the name for the findings would be LPAR 19.1, LPAR 19.2 and so on for the LPAR and ABAWD 19.1 and so on for the ABAWD review.

Finding Language:

FNS will provide the language for each finding in the CAR tool that corresponds with the Finding name provided.

Finding Evaluation:

The State is to conduct its own evaluation of the finding to include a review of the regulations and guidance pertaining to the finding. The State should evaluate the magnitude of the deficiency. Is it a systemic issue affecting a large portion of the case load or a minimal effect on a small portion of cases? Please comment on the geographic nature of the finding as well (Statewide concern vs. localized).

Root Cause Analysis:

The State should conduct a root cause analysis of the finding. The State should consult the background section of FNS's report on that specific finding, but not solely rely on it. The FNS review team is only onsite for a limited time, and cannot be expected to identify completely the root cause of an issue. The State should number the root causes, because in many cases, there will be more than one root cause. The cause(s) could potentially include eligibility systems issues, training of eligibility staff, notice language, policy interpretation, etc.

CA Steps & Timeline:

The State would then complete the Corrective Action steps for each root cause. Please use the same numbers for each root cause in the section as well; e.g. root cause #1 is addressed by CA step #1. Each numbered step should thoroughly address each root cause. The State should anticipate steps that might not be documented or assessed. For instance, if the root cause to the finding is strictly systems related,

the State should consider if a systems change were to take place, would that result in a need to conduct training for eligibility staff to ensure the State operates within compliance. If a root cause requires more than one Corrective Action step, the State should name those Corrective Action steps 1A, 1B, and so on. For instance, the root cause may be a systems issues, the CA steps could be #1A- fix systems issues, #1B- provide appropriate training to eligibility staff.

Date of Completion

The State would provide the exact or expected date of completion for each Corrective Action step. Please use the same numbers for each root cause and Corrective Action step. The State should provide at a minimum, the month and year, the Corrective Action step is expected to be completed.

Monitor & Point of Contact:

For each Corrective Action step and root cause, the State should detail who is in charge of monitoring the step and what activities will take place to ensure implementation of the Corrective Action.

Documentation:

The State should detail the documentation required to validate the Corrective Action for each finding, if applicable. The documentation itself could be attached to the response, or provided later, but the detail of the document can be included in the table. For instance, if an eligibility system change is required, FNS would want to review the systems change request which could be attached to the response. In the tool, the State would briefly detail what documentation is being provided (or anticipated) and what root cause/Corrective Action step it addresses. To further stress here, FNS is not expecting actual supporting documents to be included in the tool, but merely a description of each attachment. For example, if a JIRA ticket #4 is meant to address a needed systems change related to tracking ABAWDs in a State's eligibility system, the actual JIRA ticket could be attached to the response, but in the CAR tool, a bullet could be added stating *JIRA #4 addresses needed systems change related to tracking ABAWDs*.

Finding Name:	Finding LPAR18.1 (New)	
Finding Language:	**The State failed to issue a notice of match results for prisoner matches.**	
Finding Evaluation:		
Root Cause Analysis:	1. 2.	
CA steps & timeline:	1. 2.	
Expected Date of Completion	1. 2.	
Monitor & Point of Contact	1. 2.	
Documentation	1. 2.	

Finding Name:	Finding LPAR18.2 (New)	
Finding Language:	**Known system issues prevent workers from accurately processing cases involving foster care.**	
Finding Evaluation:		
Root Cause Analysis:	1. 2.	
CA steps & timeline:	1. 2.	
Expected Date of Completion	1. 2.	
Monitor & Point of Contact	1. 2.	
Documentation	1. 2.	

Finding Name:	Fnding LPAR 18.3 (New)	
Finding Language:	**The State does not have procedures in place to detect and refer potential overpayments or trafficking violations**	
Finding Evaluation:		
Root Cause Analysis:	1. 2.	
CA steps & timeline:	1. 2.	
Expected Date of Completion	1. 2.	
Monitor & Point of Contact	1. 2.	
Documentation	1. 2.	