



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

August 31, 2018

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

RE: Update on Formal Warning Corrective Action Plan (CAP)

Dear Regional Director Brathwaite,

I am writing to provide you with an update on the State of Rhode Island Department of Human Services (RI DHS) progress in achieving the milestones laid out in the Formal Warning CAP submitted on May 15, 2018. More specifically, I have laid out updates on the items noted in the July 20th letter to RI DHS.

Timeliness	RI DHS has identified a methodology for calculating timeliness that is based on the March 18, 2016 guidance provided by FNS entitled "Guidance for Improving State Timeliness Rates and Standardizing the Escalation Process". RI DHS will modify our current methodology for calculating timeliness as prescribed by our settlement with the ACLU to conform with the APT rate calculation guidance in this memo. We expect to be able to modify this reporting logic during the month of September to calculate timeliness for July 2018 and August 2018. As a benchmark, the timeliness for July, using our current methodology was 93%.
Backlog Elimination	RI DHS continues to make progress in working down backlogs of work across the SNAP program. It's important to note that we have trained all of our workers to work all historical work as they are processing new work on a case. We believe that this will ultimately help us to get current for all open cases while we also target additional resources on specific task areas. Our current backlogs related to the items noted in the Formal Warning CAP are as follows: <ul style="list-style-type: none">▪ Case Changes & Verifications: 6,156▪ Recerts: 3,502▪ Interims: 10,825

Overpayment Plan	As a starting point, RI DHS has been working with Deloitte to document all unworked interface matches in RI Bridges since go-live. We will provide these details to FNS during the week of 9/4 to help inform a discussion of the appropriate policies and procedures that should be applied in trying to determine potential overpayments.
ABAWD Functionality	<p>RI Bridges functionality that relates to the determination of individuals that should be classified as ABAWDs has been successfully deployed. This includes the following:</p> <ul style="list-style-type: none"> • All potentially affected individuals received a notice, letting them know that they live in a community losing its ABAWD waiver • Software deployment to restrict the Residential Address city in RI Bridges to one of the 39 recognized cities/towns in RI, and villages will no longer be accepted in the city field has been completed • Notice language and business rules for the existing ABAWD notices have been updated, and new notices have been developed for ABAWD functionality to meet the program requirements • For individuals living in a non-waived area with exemption reason code, “A-WZ – The person is living in a waived area”, an Eligibility Determination has been completed to correct ABAWD Statuses and Exemption Reasons are determined from 9/1/2018 • Beginning August 10, 2018, specific notices are being sent to individuals who may have an ABAWD countable month beginning on 9/1/2018 • Translations for ABAWD notices <p>There are currently 7 system defects that have been identified related to ABAWD timeclocks that are being scoped for a patch release in the coming months. RI DHS will provide this information to FNS as soon as the scope and date are confirmed. Any code fixes will be implemented with corresponding data fixes to ensure that countable months are appropriately applied across the population and benefits are not terminated inappropriately after the potential first ABAWD terminations effective 11/30/2018.</p>
EBT Reconciliation	RI DHS will begin EBT reconciliation, according to FNS policy, beginning 9/1/18.
Quality Control	RI DHS understands the requirement here to complete and transmit all FY 18 QC cases by January 23, 2019. Our first priority has been to add the appropriate number of QC Reviewers to this unit. PCG helped RI DHS to do an analysis

	to determine appropriate staffing and there are currently 6 additional positions that are in the process of being posted. We are now evaluating additional potential short-term solutions that would provide additional support to the unit while the new QC Reviewers are onboarded. RIDHS will provide FNS with a waiver request should any short-term intervention require FNS approval.
Reporting	All federally required reports have been deployed to production for the most recent reporting period. We will continue to work with Deloitte to implement ongoing fixes in the upcoming releases, and will work with FNS to develop a plan to provide any historical reports for missed submissions where possible.
CCRU	Attached please find an updated draft of the State's Claims Action Plan. RIDHS and Deloitte have allocated additional resources to ensure that we are able to achieve the milestones outlined in this plan. We are planning to present to FNS an updated CCRU process flow chart along with a detailed plan for system fixes and operational improvements for FNS feedback during the month of September 2018. Additionally, the team is working on a detailed proposal for data fixes that will be required to clean up inaccurate historical claims data that will be presented for approval.

In closing, I want to acknowledge the ongoing support that your team has provided to RI DHS. The collaborative relationship remains critical to our ability to make improvements to the department and to better serve Rhode Islanders.

Sincerely,



Courtney Hawkins
Director, RI DHS

cc: Deborah Barclay, General Counsel, RI DHS
Kimberly Brito, Deputy Director, RI DHS
Yvette Mendez, Deputy Director, RI DHS
Maureen Donnelly, Associate Director, Operations, RI DHS
Iwona Ramian, SNAP Administrator, RI DHS
Matthew Henschel, Policy Team Lead, USDA, FNS
Maria Volpe, RI State Desk, USDA, FNS