



OCT 03 2019

**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) acknowledges the Rhode Island (RI) Department of Human Services' (DHS) July 3, 2019 response to FNS' request for information pertaining to the Formal Warning that was issued on April 16, 2018. We are writing to follow up on several of the items noted in the State's response.

Timeliness

In DHS' July 3rd response, the State confirmed that it had made adjustments to its methodology for calculating application processing timeliness in order to comply with FNS' State Timeliness Data Protocol. Within 30 days of receipt of this letter, please provide the timeliness data for January to June 2019. The data should include the application processing timeliness rate for each month using the methodology outlined in the Timeliness Data Protocol. We expect to see an expedited rate, a non-expedited rate, and a combined rate for each month. Please also provide the numerator and denominator used for each calculation and note separately any applications that were approved within the month that were excluded from the calculations.

Backlog Elimination

In our letter dated June 3, 2019, FNS extended the deadline for eliminating the backlog of overdue unprocessed recertifications and interim reports until October 31, 2019. At the time of that letter, FNS noted that there were approximately 1,400 overdue unprocessed recertifications and 1,100 overdue unprocessed interim reports. Based upon the State's most recent data report, dated October 1, 2019, there remain 1,671 overdue unprocessed recertifications and 1,194 overdue unprocessed interim reports.

While the State has made progress in addressing the overall document backlog since the implementation of RIBridges, the backlog numbers have remained static recently. We are concerned about the State's ability to meet the October 31 deadline and expect that the State will put a plan in place to eliminate the backlog by the deadline. We understand that the State is investigating potential data issues that could be misrepresenting the size of the backlog. We look forward to receiving updates on the State's efforts during our bi-weekly calls, and will continue to monitor the State's progress in addressing this area of the Formal Warning in advance of October 31.

Delayed Implementation of Interfaces

As indicated in our June 3rd letter, FNS will continue to assess the State's compliance in this area through management evaluations (MEs) and will identify overpayments stemming from the Major System Failure.

Able-Bodied Adults Without Dependents (ABAWDs)

As indicated in our June 3 letter, FNS will continue to monitor the State's compliance in this area through MEs.

Electronic Benefit Transfer (EBT) Reconciliation

FNS and the State continue to work on EBT reconciliation, an area of deficiency identified during the RI Federal Fiscal Year (FFY) 2018 EBT ME. RI staff attended a State exchange visit hosted by New Hampshire on August 7-8, 2019. The visit was an opportunity for RI EBT staff to receive technical assistance and gain familiarity with patterns of issuance, payments, expungements, and other pertinent factors using ASAP and AMA in order to recognize problems within the EBT system.

EBT reconciliation is still an area of concern for FNS. The State continues to work through challenges related to its issuance data, which has stalled the development of a sound reconciliation plan. FNS will continue to provide technical assistance and assist the State in creating oversight procedures to help ensure that the data and reports used for EBT reconciliation are accurate and the State certification system and the EBT system are synchronized.

Under separate cover, FNS will continue to work with DHS in order to provide fiscal oversight of the EBT operations and ensure compliance with the EBT reconciliation requirements.

Quality Control

The State's Quality Control (QC) unit has transmitted its FFY 2019 QC case reviews through sample month April 2019 timely. As a result, FNS is able to generate State-reported data for the Payment Error Rate (PER) and the Case and Procedural Error Rate (CAPER) for FFY 2019 in the Regional Office Quality Control Tracking System (ROQCTS).

Available State-reported data in ROQCTS, as of the date of this letter, indicate a PER of 20.92% and a CAPER of 41.99%. The State policy, training, and field office leadership must implement corrective actions to address these high error rates. FNS will continue to provide technical assistance and will monitor performance outside of the Formal Warning.

Reporting

FNS acknowledges the progress that the State has made with regard to submission of outstanding historical reports, yet we remain concerned about the accuracy of the data submitted. For example, due to an issue that FNS identified with the State-submitted

data, the State is still in the process of revising all of the FNS-366B reports that it had submitted since the implementation of RIBridges. There are also known issues pertaining to the FNS-46 and 388 that must be addressed. For the FNS-46 report, the State is unable to identify invalid/unauthorized issuance data for line 10. Additionally, during the onsite validation on August 13-14, FNS discovered that line 7 (total returns) does not reconcile to FNS AMA data. FNS-388 issuance data does not reconcile to net issuance reported on line 8 of the FNS-46. We note also that the State continues to identify issues with and make corrections to the logic associated with specific reports.

Additional work is needed to ensure the historic and ongoing accuracy of all FNS reports. FNS expects that the State will continue to devote sufficient resources to monitoring and addressing any issues related to these reports. Until RI is able to produce reliably accurate reports, this remains an area of considerable risk for the State.

Claims Collection and Recovery Unit (CCRU)

FNS continues to monitor this area closely. We appreciate the State submitting the proposed organizational chart and request that the final version be submitted once it is completed.

FNS notes that the State continues to experience challenges in maintaining adequate and stable staffing in CCRU. This is extremely concerning given the State is in the midst of piloting the CCRU functionality. Instability in staffing could result in FNS determining that the State is not able to move from pilot to full implementation. CCRU must be fully operational and ready and able to address the backlog of work that has accrued in this area since implementation of RIBridges in addition to the backlog that existed in the State's legacy system. Within 30 days, please provide additional information regarding the State's plan for ensuring adequate and stable staffing, training, and oversight for the unit on an ongoing basis.

Please provide FNS with the requested information within the timeframes indicated above. FNS appreciates DHS' ongoing efforts to address the issues identified in the April 16, 2018 Formal Warning letter. Our agency remains committed to providing technical assistance as needed. If you have any questions, please contact Maria Volpe at 617-565-6390.

Sincerely,



Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region

cc: Deborah Barclay