



NOV - 8 2016

**United States
Department of
Agriculture**

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

Melba Depeña, Director
RI Department of Human Services
Louis Pasteur Building
57 Howard Avenue
Cranston, Rhode Island 02920

Dear Director Depeña:

The Food and Nutrition Service (FNS) continues to monitor the effects of the implementation of the RIBridges system that went live on September 13, 2016, and provide technical assistance to deal with the multiple issues related to implementation. We appreciate the efforts the State is making to address the ongoing technical and business process issues and we share the Department of Human Services' (DHS) goal of bringing the State back into compliance so that Rhode Island families in need can receive timely and accurate access to Supplemental Nutrition Assistance Program (SNAP) benefits.

As DHS works to make improvements, critical access issues remain. FNS has been on site throughout the State, most recently on November 1, 2016, and has witnessed and documented issues of serious concern including, but not limited to: excessive lines and wait times that present a barrier to program access; clients being turned away and asked to return on another day without an appointment; and SNAP benefits unavailable or incorrect. FNS has also notified DHS of the need for specific reporting requirements related to the issues of concern. It is important to note that we have received numerous client complaints and advocate concerns regarding the severity of these issues.

While FNS appreciates DHS' efforts described on our October 21, 2016 call and in its October 31, 2016 letter and Plan of Action, continued corrective action is urgently needed to ensure that low income households of Rhode Island have access to important food assistance through SNAP. Consequently, this letter serves as advance notification that DHS could soon be subject to suspension or disallowance of Federal Financial Participation (FFP) administrative funds in accordance with 7 CFR 276.4(d)(1) unless DHS submits a corrective action plan (CAP) that is responsive to the specific concerns stated below, makes progress resolving those concerns, and complies with the monitoring and reporting actions as described in this letter.

In addition, this letter serves as notification that, in accordance with 7 CFR 277.18(h), DHS could be subject to the suspension or disallowance, in whole or in part, of FFP administrative funding for system costs, due to RIBridges' failure to meet FNS statutory and regulatory requirements. FNS has repeatedly expressed serious concerns that RIBridges does not meet program functional and performance requirements, from the beginning of the testing phase through the pilot and implementation phases, in letters to DHS dated August 15,

August 26, September 2, and September 6, 2016. In the letter dated September 2, FNS notified the State that FNS did not concur with DHS' plan to move forward with implementation. Now that RIBridges has been fully implemented, DHS must bring the system into compliance with the terms and conditions of approved advance planning documents to avoid suspension or disallowance of FFP.

FNS appreciates the steps DHS has taken to address its compliance issues, including its efforts to improve call center operations and case handling described in its October 31, 2016, Plan of Action. However, continued action is needed to ensure all issues are resolved. DHS' CAP must include a detailed plan on how to correct technical problems with the system, and lack of training and inefficient business processes that impact program access and integrity. The CAP must also provide a timeline for bringing RIBridges into compliance with Federal requirements and the terms and conditions stated in approved advance planning documents. Within 14 days from the date of this letter, DHS must submit a CAP, which may amend and elaborate upon its recently submitted Plan of Action, to ensure that it includes all of the following:

- Develop and implement a triage and work prioritization plan to tackle expedited cases, pending applications, and re-certifications.
- Restore benefits to eligible households whose cases have been incorrectly closed, households whose benefits were not loaded onto their EBT cards, and households who did not receive the correct amount of benefits loaded onto their EBT cards.
- Address overcrowding in the offices and ensure that clients are not being denied the right to timely service. Some options to address overcrowding include:
 - Instituting an effective triage system that includes provisions for the elderly and disabled.
 - Adding resources through overtime and/or temporary work, bearing in mind that only merit system personnel can conduct interviews and make SNAP eligibility determinations.
 - Extending office hours and shifting resources across offices.
 - Balancing the processing workload across all queues.
 - Providing a "mobile unit" for the Providence office.
- Resolve Call Center outages immediately and staff the Center accordingly to address workload.
- Ensure that accurate and timely notices are sent to applicants and recipients.
- Properly train all eligibility workers to navigate the system, validate case conversions, identify and resolve instances of duplicate cases and benefit issuances, and properly use case notes and narratives.
- Provide sufficient interpreters and translated program materials to support clients with limited English proficiency.
- Eliminate document backlog due to documents not scanned or indexed.

- Restore SNAP Integrity and Quality Control procedures as required by law and regulations. Specifically:
 - Ensure that correct Quality Control samples can be pulled from the system
 - Ensure all critical matches including wage matches are being conducted
- Provide timelines for:
 - Delivering required and deferred system functionality and implementing fixes to bring the system into compliance with the terms and conditions of approved advance planning documents. This includes, but is not limited to, system fixes of duplicate cases and duplicate benefit issuance.
 - Completing each corrective action, names of the individuals responsible for implementing each corrective action, and plans for monitoring and evaluating the effectiveness of each action.

In order for FNS to accurately assess the scope of program access issues and case errors resulting from the implementation of RIBridges, DHS also must provide in the CAP the following baseline data within 14 days of the date of this letter:

- The total RI SNAP caseload for the month of September (prior to conversion)
- The total RI SNAP caseload for the month of October
- The total RI SNAP benefit issuance for the month of September (prior to conversion)
- The total RI SNAP benefit issuance for the month of October
- The number of SNAP cases that did not convert from the legacy system to RIBridges
 - The number of those cases that have now been entered into RIBridges and issued correct benefits
- The number of cases that converted with a benefit mismatch
 - The number of those cases that have now been issued correct benefits
- The number of RI SNAP households due for recertification in October
 - The number of notices of expiration that were sent
- The number of RI SNAP households due for recertification in November
 - The number of notices of expiration that were sent
- The number of known cases of duplicate issuance and value of duplicate benefits

The data listed above must include a narrative explaining each report and its definitions, the source of each report and how the data was pulled (i.e., RIBridges, ad-hoc, manual reporting,) and whether the State has verified the accuracy of the data.

Timely and accurate monitoring of the situation is critical. To date, FNS remains concerned that DHS is unable to accurately and expeditiously provide requested data including the identification of cases with errors resulting from the RIBridges roll-out. On Thursday, September 22, 2016, FNS requested that DHS provide weekly reports on the timeliness of processing applications, re-certifications, call center metrics, and backlogs. While DHS has provided data in response to this request, most recently on October 21, 2016, additional data is still needed to make a complete and accurate assessment of the situation.

To ensure that DHS and FNS can appropriately monitor the situation, track process, and make changes to corrective action strategies as needed, DHS must provide weekly reports. For reference, a complete list of weekly reporting requirements, including new data elements, are attached. In addition, DHS Administration must participate in weekly and as-needed meetings/calls with FNS to review weekly reported data and status of corrective actions. These meetings began November 7, 2016. DHS must submit a weekly report to FNS two business days prior to the weekly meetings with FNS.

The following summarizes the list of immediate actions DHS must take as part of this advance warning letter:

- DHS must submit a CAP by November 22, 2016
- DHS must submit baseline data by November 22, 2016
 - DHS must participate in weekly and as needed meetings/calls with FNS.
- DHS must submit complete weekly reports two business days prior to scheduled weekly meetings with FNS (see attachment)
 - The weekly reports must cover all reporting requirements outlined in the attachment

FNS Regional staff will continue to be on site to ensure that Rhode Island households have access to benefits in accordance with the Food and Nutrition Act of 2008, as amended, and Federal Regulations. The FNS Northeast Regional Office will conduct case reviews at district offices to monitor compliance and may validate the data and its sources provided by DHS to ensure accurate reporting.

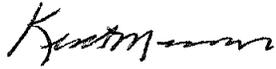
If FNS determines that DHS has failed to meet the requirements set forth in this letter to FNS's satisfaction, FNS will issue a formal warning letter in accordance with 7 CFR 276.4. DHS would then have 30 days to submit additional evidence that the State is in compliance or submit a revised CAP. If the response is inadequate, FNS could suspend Federal funding of State administrative expenses.

As a note, through site visits and a review of preliminary data, FNS is concerned that households may have been over issued benefits as a result of the implementation of RIBridges. FNS will investigate this further and request any additional data needed to determine the scope of any over issuances. At

that point, FNS will make a determination on how to proceed in regards to any over issued benefits.

We appreciate your commitment and attention to addressing these issues. Our goal is to help DHS avoid suspension or disallowance of administrative funding and ensure access to SNAP for eligible households in Rhode Island as well as the integrity of the program. FNS staff is available to provide 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) 565-7177 or Bonnie Brathwaite at (617) 565-6397. Thank you.

Sincerely,



Kurt Messner
Regional Administrator
Northeast Region

cc:

Yvette Mendez
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Attachment

Attachment
RI DHS Weekly Reporting Requirements

DHS must provide the data elements listed below in a weekly report to FNS. The weekly report is due to FNS two business days prior to the scheduled weekly meetings with FNS.

Reporting Requirements from FNS' September 22, 2016 letter

The following data elements shall be broken out by day and office:

- Number of SNAP clients coming into each office. Average client office wait time.
- Number of SNAP applications received (report separately the number of expedited, regular initial, and recertification applications received). Report separately the number of on line applications received.
- Number of SNAP case maintenance items received (ex. verifications dropped off or mailed, change documents etc.)
- Number of SNAP documents in backlog by document type (i.e. initial applications, expedited applications, verifications, re-certifications, etc.)
- Number of EBT replacement requests cards set aside for priority processing.
- Number of EBT replacement cards successfully loaded with benefits and received by the client.
- Number of documents that have been scanned.
- Number of documents that have been scanned but not indexed.
- Call center metrics: the number of incoming calls; the number re-directed to the DIRAD IVR; the number of abandoned calls prior to queue selection; the number of calls received; the number of hang-ups; average wait time; average handle time; and any other relevant call center metrics.
- Daily count of number of applications approved, denied, and pending in RIBridges by type of application (initial regular application, expedited application, recertification application).
- Daily count of number of applications approved, denied, and pending in RIBridges by mode of application (in person, mail, fax, phone, online).
- Daily count of the number of active cases terminated as a result of a processed change or other ineligibility factor.
- Application Processing Timeliness Data calculated according to the Timeliness Data Protocol included in the "Guidance for improving State Timeliness Rates and Standardizing the Escalation Process" dated March 18, 20 16
- Number of expedited applications not yet processed after 7 days from the date of application.
- Number of regular applications not yet processed after 30 days from the date of application.

- Any other information tracked that would be helpful in assessing the rollout

Additional Reporting Requirements

- The total number of cases that did not convert from the legacy system to RIBridges that have now been entered into RIBridges and issued correct benefits
- The total number of cases that converted with a benefit mismatch that have now been issued correct benefits
- The total number of known cases of duplicate issuance and value of duplicate benefits
- The total caseload (reported monthly)
- The total RI SNAP benefit issuance (reported monthly)
- The number of RI SNAP households due for recertification (reported monthly)
 - The number of notices of expiration that were sent (reported monthly)

In addition, each weekly report must include status of DHS' corrective actions.