



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

October 19, 2018

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

RE: RI FFY 2019 ME Review Plan

Dear Director Brathwaite:

Please accept this document as the FFY 2019 Management Evaluation (ME) Review Plan for the State of Rhode Island Department of Human Services (RI DHS).

FY 2019 State Target Areas are:

1. Recipient Integrity Module 2: Data Matching and Card Replacement;
 - a. Using the FNS SNAP Recipient Integrity Module 2, the State will conduct reviews of the data matching for: Prisoner Matches; Death Matches; New Hire Matches; and the Systematic Alien Verification and Eligibility (SAVE) System matches. Additionally, the State will conduct a review of the card replacement process and procedures.
2. Able-Bodied Adults Without Dependents (ABAWD) tracking and policy compliance for counties/project areas transitioning -off of Statewide time limit waivers in FY 2019;
 - a. This section will be covered under the "at risk" section below.
3. Employment and Training (E&T) Program Review - in States that operate a mandatory E&T program; and
 - a. RI DHS does not operate a mandatory E&T Program. RI DHS' E&T Program is voluntary. E&T will not be reviewed as part of this plan.
4. SNAP-Ed.

The FY 2019 State at-risk review:

There are six project areas in Rhode Island. Providence is considered a large project area and is required to be reviewed annually. Pawtucket, South County, Warwick and Woonsocket are medium project areas and are required to be reviewed every two years. Newport is a small project area and is required to be reviewed every three years. The ongoing three-year review cycle for the project areas will be as follows:

FY2019 Providence and Woonsocket

FY2020 Providence, Pawtucket, South County, Warwick and Newport

FY2021 Providence and Woonsocket

The schedule for the two project areas reviewed in FY19 will be as follows:

March 2019 – Providence Regional Center review a sample from January 2019

May 2019 – Woonsocket DHS review a sample from March 2019

The FY 2019 State at-risk review areas are:

1. ABAWDs;
2. E&T in counties/project areas that have budgets in excess of \$5 million or in States that receive ABAWD pledge funds;
The State does not have an E&T budget in excess of \$5 million nor does it receive pledge funds and therefore this area will not be reviewed
3. EBT Administrative Terminal System Security;
4. Recipient Claims Management/Treasury Offset Program; and
5. Recipient Integrity

1. ABAWDs

The Program Access Review will be conducted using the methodology contained in the FNS Supplemental Nutrition Assistance Program: Conducting Program Access Reviews at Local Offices – A Guide for FNS Regional Offices, April 2011 and the Program Access Review Guide Tools provided by FNS as well as the Program Access Review (PAR) FY 2017 Supplemental Guide, October 2016. This guide and guide tools for FNS Regional Offices have been adapted for use by State-level ME Reviews. The Management Evaluation Reviewer will collect participation data and local office information prior to the review. A sample of initial applications, denied applications, terminations and recertification will be selected for electronic case file reviews.

We will request that a random sample of cases to be reviewed be generated by our system contractor, Deloitte. We request that the process for obtaining that sample, as described in FNS' aforementioned supplement, "Random Sampling Guidance" pages 12-14 be used.

The electronic case files chosen for review will be examined to ensure that all of the verification requirements and electronic case file documentation is contained in the record. Reviewer will also check all notices, including notices related to ABAWD status of the household members.

The reviewer will determine if the ABAWD policy and procedures are being correctly applied. This will include ensuring that staff are knowledgeable in the ABAWD policy and procedures and that the system is counting the ABAWD months appropriately and cases are being processed correctly within the system programming.

Staff will be interviewed regarding their knowledge of SNAP policy and procedures, particularly with regards to ABAWD policy and procedures. Clients and advocates will also be interviewed. Participants will be asked to describe their before eligibility interview and post interview knowledge of the ABAWD process.

The reviews will begin with an Entrance Interview which informs the local office of the agenda and the scope of the review. The in-office review last approximately three days. At the conclusion, an Exit Conference will be scheduled to discuss any findings or issues that were discovered. At this meeting, cases are reviewed and possible corrective actions are discussed.

Within thirty days of the review, any Findings or Observations will be addressed in a letter to the Office Administrator of the reviewed office. Copies will also be sent to the DHS Director, Associate Directors, SNAP Administrator, SNAP Assistant Administrator and the Corrective Action Officer. The Office Administrator will have thirty days to respond to the findings with a corrective action plan. This plan should consist of corrective actions and timelines of when they will be or have been implemented. The ME Reviewer will monitor any pending corrective actions and verify when they are completed.

3. EBT Administrative Terminal System Security

In conjunction with office reviews, but as a separate review, the reviewer will also review the EBT process from State Level to office level. Using the tools available in the FNS SNAP Recipient Integrity Module 2, and in the Recipient Integrity Guide Module 2_ Data Matching Card Replacement 10-17-17, the reviewer will review the areas of EBT security. The review will include EBT card and equipment security and issuance and replacement process and procedures.

4. Recipient Claims Management/Treasury Offset Program

Currently, the State's collections process in the RI Bridges system is not functioning. This includes adding cases to the TOP.

Once the process is functional, the reviewer, using the ME Review Guide Recipient Claims - 09-2017, will conduct a review of the claims management process including the TOP process with the State's Claims, Collections and Recovery Unit, (CCRU).

As the CCRU has been working with the software developer, Deloitte, the Recipient Claims guide has been provided to them for reference and guidance.

5. Recipient Integrity

As stated above, Based on the State Target area, using the FNS SNAP Recipient Integrity Module 2, the State will conduct reviews of the data matching for: Prisoner Matches; Death Matches; New Hire Matches; and the Systematic Alien Verification and Eligibility (SAVE) System matches. Additionally, the State will conduct a review of the card replacement process and procedures.

If you have any questions or concerns, or require further information, please contact William O'Donnell at (401) 415-8294.

Sincerely,



Iwona Ramian
SNAP Administrator

cc: Courtney Hawkins, Director, RI DHS
Kimberly Brito, Deputy Director, RI DHS
Yvette Mendez, Deputy Director, RI DHS
Maureen Donnelly, Associate Director, Operations, RI DHS
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