

Rhode Island Supplemental Nutrition Assistance Program (SNAP)

Responses to the Food and Nutrition Services (FNS) Management Evaluation Report

Combined Review June 2017

State Level Program Access

Local Level Program Access

State Management Evaluation System

Able-Bodied Adults Without Dependents Pre-Transition

A. Local Program Access

Finding #A.1 (New): Failure to follow appropriate interview scheduling procedures

Required Corrective Action: The SA must implement adequate procedures to ensure that all households that are not interviewed on the day they submit their application are scheduled for an interview within a timeframe that will provide those eligible an opportunity to participate within 30 days of the application being filed. The SA must document how it is informing households of the interview. The SA must also make sure that eligibility workers are assigning and taking the appropriate “action-based tasks” so that all interviews are conducted timely.

State Response: Timely processing of SNAP applications continues to be one of the highest priorities for RI DHS. The department strives to provide same day application processing to any SNAP applicant who submits an application in person and is screened as being eligible for expedited service and while this has been at times hindered by staffing resources, the Department continues to make improvements. All other interviews will be scheduled during the application registration process on a first available basis.

To determine the most efficient interview scheduling procedures, RI DHS will first need to determine the number of applications received in a typical thirty-day time frame, and analyze this data to determine how the scheduling process can work best. RI DHS is utilizing weekend and overtime hours to conduct interviews as much as possible.

To improve the interview scheduling process, RI DHS will schedule all interview appointments at the time of application registration. Applications screened as expedited will be registered as priority in the system by staff specifically assigned to registering applications. In-person dropped off applications, where the client is being seen by an eligibility technician, will be registered first. If staffing levels permit, the client will be given a same-day appointment for the interview. If staffing levels in the field office do not permit same-day appointment, the client will be assigned a phone interview on a first available basis at the time of application registration. If the applicant requested an in-person interview, the interview will be scheduled on a first availability basis for in-person interview.

When processing a SNAP application, the eligibility technician makes a cold call to the client. If the client cannot be reached and the interview cannot be completed, the client must complete the interview as assigned during application registration process. If the interview is completed during the cold call, application is processed for eligibility. If the initial interview is assigned within 30 days from the date of application and the client misses the interview, a Notice of Missed Interview will be mailed out advising the client that they must reschedule the interview within 30 days of the date of their application.

Due to system defects with the worker inbox, the Department continues to utilize paper lists of applications that need to be worked and manually assigns them to workers in the field offices each morning. Supervisors will now also track the interview appointment dates, and ensure that staff is properly closing appointment tasks once a cold call or scheduled interview is completed. Supervisors will also monitor to ensure that staff is properly marking interviews as no shows in the system if client missed the interview. This will help ensure that the proper client notices are mailed out.

Associate Director of Field Operations, Maureen Donnelly; Field Administer, Denise Tatro and Administrator of Family and Adults Services, Betty Perez are the responsible Department staff as well as Chief Operating Officer, EOHHS, Ben Shaffer.

Finding #A.2 (Repeat): Failure to appropriately issue the Notice of Missed Interview, (NOMI)

Required Corrective Action: The SA must ensure that it is issuing NOMIs in accordance with Federal regulations. The issues identified during the review appear to be a combination of both system-related errors and worker errors (which themselves are likely the result of workers learning to navigate the new system). The SA must investigate and address the root cause(s) of the system issues and provide targeted training to eligibility staff.

State Response: All system issues with the NOMI have been reviewed by DHS program and policy staff with the system vendor. Several issues have been identified with the functionality of this notice, including incorrect triggers as well as problems with the date logic. As a result, a new business requirement has been drafted to address the identified issues and is prioritized for the January release.

To ensure that business procedures and policy is correctly being applied by staff, the DHS training unit will provide refresher training on SNAP policy and office procedures as it related to the NOMI. The refresher training is targeted to be complete for all staff by the end of January.

Responsible DHs staff are: Associate Director of Field Operations, Maureen Donnelly and the DHS Notice Team.

Finding #A.3 (New): Case file documentation does not support eligibility decisions and benefit-level determinations

Required Corrective Action: The SA must establish standard case management procedures to ensure the case files are documented to support eligibility, ineligibility and/or benefit level. The SA must ensure that all case documentation is contained in RIBridges and properly indexed so that eligibility workers may act on changes or make eligibility determinations in a timely manner. The SA must ensure that workers use consistent, detailed case notation to support case actions. The State's CAR should include an example of a standard case documentation and any guidance or training materials provided to eligibility workers.

State Response: Consistency and accuracy of case notes has been a chronic issue that dates back prior to the RIBridges implementation. The issue appears to be pervasive throughout all field offices, but somewhat limited to a minimum number of staff. Supervisors will review the procedural memo, "Transmittal #: 16-13, Case Notes in RI Bridges" with their staff and supervisors will spot check cases to ensure compliance.

DHS staff is also working with the system vendor to ensure that changes affecting the case that come from system actions such as mass updates and interfaces, will be generating appropriate case notations automatically in the case note section of the affected case.

Since the implantation of the new eligibility system, the Department has struggled with electric case management and scanning issues. There have been an unacceptable number of SNAP applications and other documents that were scanned into a system queue that was inaccessible to

the field staff or indexed in a matter that made the document not viewable in the correct case. The scanning issues have been widely discussed by DHS with the system vendor and changes have been implemented to address the issues. The indexing functionality has been simplified to make it easier to index a document to the correct individual and case. Additionally, the system has streamlined the queue flows and provided a queue for documents that are scanned in the system but not assigned to a case. This queue is monitored by state staff to ensure that the number of documents in this queue do not indicate any issues. Procedures to help identify the proper cases for the unassigned documents is being developed.

To help address some of the scanning issues, the State implemented a “document separator” with QR Codes. The staff insert these sheets in between documents to be scanned. The system reads the QR code and automatically indexes the scanned documents into the correct queue. Thereby reducing the human errors of indexing the documents erroneously into incorrect queues. This process is spot checked daily by an on-site staff member and all staff have received ongoing, supervisor presented reminder trainings regarding scanning procedures.

Upcoming system releases will include a number of additional system improvements to continue to improve the accuracy of scanning and indexing procedures.

Responsible state staff are: Case Notes: Associate Director of Field Operations, Maureen Donnelly and for the scanning center: Administrator, George Bowen

Finding #A.4 (Repeat): Applications are not processed within 30 days

Required Corrective Action: The SA must ensure that all applications are processed within 30 days as required. Eligible applicants have the right to receive benefits within 30 days under normal processing standards. Additionally, ineligible applicants must be notified of their ineligibility no later than 30 days after the date of application in accordance with 273.2(g)(3). According to weekly data reports that FNS receives from DHS, the SA has made progress over the last year in addressing the backlog of unprocessed initial applications; however, the timeliness of initial application processing remains below acceptable thresholds.

State’s Response: The State has eliminated the backlog of SNAP applications and is processing SNAP applications in a timely manner. The incoming number of applications is monitored and tracked by a state data team as well as the DHS leadership. Applications are assigned for processing to state staff every morning. Supervisors are tasked with monitoring personnel productivity as well as system related issues that prevent an application from being processed. Any system issues that prevent an application from being processed are tracked through a problem ticket. The vendor has three days to resolve the application issue. State staff track and monitor the tickets, and the list of pending applications.

Responsible staff: Associate Director of Field Operations, Maureen Donnelly; Chief Operating Officer, EOHHS, Ben Shaffer.

Finding #A.5 (New): Untimely expedited issuance

Required Corrective Action: The SA must take immediate corrective action to ensure all households eligible for expedited benefits receive them by the seventh calendar day following the date of application. As noted in Finding #A.4 above, weekly data reports indicate that the SA has

made progress over the last year in addressing the backlog of unprocessed initial applications; however, the timeliness of initial application processing remains below acceptable thresholds. In its CAR, the SA must submit a detailed plan of action for achieving a timeliness rate of 95% for both expedited and non-expedited applications within six months of receipt of this report.

State's Response: The state has created a unit of eligibility technicians to process all expedited SNAP applications and has eliminated the backlog. The work is monitored and tracked by field supervisors as well as the state's data team. Expedited SNAP applications remain a priority for application processing.

Responsible staff: Associate Director of Field Operations, Maureen Donnelly; Chief Operating officer, EOHHS, Ben Shaffer.

Finding: #A.6 (New): Failure to meet requirements for providing bilingual program materials

Required Corrective Action: The SA must ensure that bilingual certification materials are provided to relevant households in accordance with 272.4(b)(1) and that notices provided to households in non-English languages are completely and accurately translated into that language. As part of the CAP, the SA must send copies of the notices to FNS for review prior to implementation.

State's Response: Issues with notice translations have been regularly identified in the state's QC of notices that have been completed since the launch of the new eligibility system. The problem with the Benefit Decision Notice text in particular has been reported to the vendor, Deloitte, shortly after go-live and is being tracked as part of RIB-46925.

Deloitte conducted a technical feasibility to translate denial reasons. An issue was found in the third-party tool 'Open Text' used to develop notices. The issue in the tool corrupted non-English characters when creating the notice. This issue impacts elements dynamically retrieved from a data base such as Denial Reasons. Deloitte has worked with the software vendor to resolve the issue and successfully completed the technical feasibility. Correcting the translation of this correspondence has been prioritized by the DHS leadership team and is scheduled for a release on January 20, 2018.

The DHS policy staff will work on providing the proper translations for all other notices. Each new notice translation will be shared with FNS. The Department aims to have all notice translations completed by the end of June 2018. In the interim, the State provides Babel text in several languages with each of its notices. The Babel text is printed in various languages representing the non-English speaking applications/participants' languages and instructs the reader to call an interpreter service where the notice can be translated.

DHS responsible staff: Associate Director of Policy, Maria Cimini

Finding #A.7 (New): Failure to calculate income correctly

Required Correct Action: The SA must follow the procedures outlined in 273.10(e)(1)(i) for determining a household's net monthly income. The SA must provide training for all eligibility workers on the proper procedures for determining income to ensure that eligibility workers are

able to identify inaccuracies in benefit calculations. The State should also conduct a comprehensive review of system functionality to identify defects that could be resulting in the incorrect benefit calculation. In its CAR, the SA must provide copies of the training material that is developed and the results of the review of system functionality.

State's Response: The SA is working with the vendor, Deloitte to ensure that all SNAP cases present with correctly calculated benefits. The State is expanding its Hotline staff, technical and program specialists, who are knowledgeable in program policy and system processes, to ensure that eligibility results and benefits levels are accurate. Right now, all system issues that affect eligibility status or benefit level are prioritized and resolved as quickly as possible. The issues are tracked during the bi-weekly SNAP Problem Management meetings and escalated to DHS leadership attention if vendor's responses to resolve issues are not timely or pose barriers to resolution.

The staff who are processing SNAP cases are being reminded by their supervisors during daily staff huddles, to check the results to ensure that they are correct. Any inaccuracies are brought to the supervisor's attention and resolved with the worker or raised to a "ticket" as necessary.

Training materials for refresher training are being developed and will be provided to FNS within 60 days.

Responsible staff: Associate Director of Field Operations, Maureen Donnelly; SNAP Administrator, Iwona Ramian

Finding #A.8 (New): Improper assignment of certification periods

Required Corrective Action: The SA must meet all regulatory requirements by assigning the correct certification periods to appropriate SNAP households. The State's CAR must outline strategies, including training and/or system enhancements, to ensure the correct assignment of SNAP certification periods for all households.

State's Response: The SA's DHS Director is currently working with FNS on the plan to address recertification backlogs including all aspects of the recertification process and the resulting unintended consequences.

In the interim, staff are trained on the proper certification periods for the two SNAP populations – simplified reporters and change reporters, as part of the SNAP onboarding training and refreshers. Unprocessed SNAP recertifications are processed as new recertifications are submitted. Additionally, recertification packets must be processed according to policy to continue recipient benefits.

A conversion issue that was identified in which the certification periods were set incorrectly for change reporters has been fixed in the November 18, 2017 release. Another code fix on this issue went into production on December 8, 2017. Additional data and code fixes on the issue of incorrect certification dates are slated to be deployed in the January 20, 2018 release. All identified issues with certification periods are prioritized and tracked through the SNAP Problem Management meetings. It is the state's intent to have all certification period issues resolved by March 2018.

Responsible staff: RI DHS Director, Courtney Hawkins; RI DHS SNAP Administrator, Iwona Ramian

Finding #A.9 (New): Notice of Eligibility does not conform to Federal regulations

Required Corrective Action: The SA must ensure that clients who are found eligible receive a Notice of Eligibility that accurately reflects their correct certification period and benefit allotment. In its CAP, the State must identify the root cause(s) of these issues. The fields pertaining to the certification period and benefit level in the notice should be auto-populated by the system. The State must identify and address any system-related issues that could be causing the notice errors.

State's Response: Since the launch of the new eligibility system, the SA's notice team has been working with the state's vendor, Deloitte to ensure that all of the notices for the SNAP and other programs are compliant with federal regulations and meet the needs of the SA and the clients. The work of this group has been slow going given the volume of notices, complexity of federal regulations, and system issues. Many of the issues noted with the Notice of Eligibility (Benefit Decision Notice (BDN)) stem from conversion issues, incorrect certification dates, incorrect denial reason codes, unreliable/conflicting case data, and transposition of case dates. By March 2018, the SA intends to resolve most issues affecting the BDN. The data integrity issues may take more time to address. The SA has a team of staff reviewing data in the system and helping isolate the data integrity issues stemming from the system that can be addressed through technical code fixes. The work of this team is slated to continue through at least June 2018.

It is the SA's intent to update each SNAP notice to ensure not only federal compliance but also readability, accuracy, and ease of use. As the notices are finalized, the SA will update FNS NERO during regular weekly contact. It is the SA's intent to have all SNAP notices finalized in template by June 2018.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

Finding #A.10 (New): Untimely processing of interim reports resulting in invalid closures

Required Corrective Action: The SA must ensure that all interim reports are processed within the required timeframes. If eligible, recipients have the right to receive their benefits on their regularly scheduled issuance date. Similarly, households must be sufficiently notified of a decrease of benefits or ineligibility. According to the most recent weekly data provided by DHS (dated August 28, 2017), there are a total of 11,353 unprocessed interim reports pertaining to SNAP. In its CAR, the SA must submit a detailed plan of action describing steps that it will take to decrease its backlog of unprocessed interim reports by 50% within three months of receipt of this report and to eliminate the backlog within six months.

State's Response: The SA's DHS Director is currently working with FNS on the plan to address recertification and interim report backlogs including all aspects of the recertification process and the resulting unintended consequences. Due to the issues affecting recertifications, many interim reports have not been mailed out timely nor processed timely. As of October 2017, the SA has starting processing interim reports as part of the daily work done by eligibility technicians. The SA is analyzing monthly data on applications, recertifications, and interims, to develop a plan to process all SNAP requirements in a timely matter. A detailed-plan to decrease the current backlog will be shared with FNS by January 15, 2018. Additionally, recertification procedures and negative action policies have been implemented moving forward.

Responsible staff: RI DHS Director, Courtney Hawkins; RI DHS SNAP Administrator, Iwona Ramian

Finding #A.11 (New): Failure to appropriately issue a Notice of Adverse Action (NOAA)

Required Corrective Action: The SA must ensure that NOAAs are sent to clients at least 10 days prior to when the proposed action becomes effective. The SA must develop procedures to ensure that prior to any action to reduce or terminate a household's benefits, the client is provided with a timely and adequate notice of adverse action in accordance with Federal regulations. Internal quality control processes can be an effective measure to ensure that client notices are accurate before they are mailed. However, a process that prevents notices from being issued to households at all can have a detrimental impact on households as inaccurate or confusing notices. The State must revise its notice review practices to ensure that there is sufficient time to review notices and address any deficiencies and still provide the household with timely and accurate notification of adverse actions.

State's Response: This issue has been directly linked to the unprocessed recertifications on which benefits have continued past the end of the certification period. In September 2017, the SA had amended its negative action process to separate the noticing of the action from the actual action. This results in notices of adverse action to be issued mid-month, while the action in the system of putting a case in a closed status occurs at the end of the month. The SA is in the process of making these system changes permanent as of March 2018, and can forward to FNS design documents related to this change.

The SA is also working closely with the state mail room to ensure that notices transmitted to the mail room for mailing are mailed the same day or next day. State staff are monitoring the daily mail logs and have asked that any instances where the process deviates from the same day or next day mailing is documented and raised through the appropriate changes for additional staff, overtime, or cost, to ensure that timeline is followed.

DHS responsible staff: Associate Director of Policy, Maria Cimini

Finding: #A.12 (New): Failure to properly close households at the end of the certification period

Required Corrective Action: The SA must develop procedures to ensure that no households participate beyond the expiration of their assigned certification period. According to the most recent weekly data provided by DHS (dated August 28, 2017), there are a total of 12,919 unprocessed applications for recertification pertaining to SNAP. It is FNS' understanding that the majority of these households have continued to receive benefits beyond the expiration of their certification periods. In its CAR, the SA must submit a detailed plan of action describing steps that it will take to decrease its backlog of unprocessed recertification applications by 50% within three months of receipt of this report and to eliminate the backlog within six months. The SA should also identify steps that it has taken or will take to ensure the timely processing of recertification applications so that backlogs do not arise in the future. DHS should also detail any procedures or system changes that have been implemented to ensure that households do not participate beyond the end of their certification periods without an eligibility determination.

State's Response: The SA's DHS Director is currently working with FNS on the plan to address recertification and interim report backlogs including all aspects of the recertification process and the resulting unintended consequences, and will submit an updated plan for processing this backlog as part of that plan.

It should be noted that current recertifications are being processed by state eligibility technicians as they come in. Additionally, any cases that have unworked recertifications at the end of the certification period are not issued benefits until their recertification process is complete and the household is deemed eligible for continued participation in SNAP. The system changes to ensure that cases are not kept open beyond their certification period went to effect in September 2017. The state's data team as well as field supervisors and DHS leadership are provided weekly data reports showing the total number of received renewal forms, the number of worked cases, the number of cases awaiting client action, and the status of the recertification process. This allows staffing resources to be switched as appropriate to ensure that recertifications are processed by the end of the certification period.

Responsible staff: RI DHS Director, Courtney Hawkins; RI DHS SNAP Administrator, Iwona Ramian

Finding #A.13 (New): Notices of Expiration (NOE) are not sent within the required timeframe

Required Corrective Action: The SA must ensure that all households due for recertification are sent a NOE within the required timeframes. Issuance of the NOE should be an automated process within RIBridges, but the State must establish and adhere to consistent timeframes for running batch processes and printing and mailing notices.

State's Response: The recertification packet, which includes the NOE, is mailed out to households on the 1st day of the next to last month of the certification period. The issue that the NOE is being mailed out too early has been attributed to the fact that the new eligibility system is an integrated system with once case number being associated with multiple programs. When a program is due for recertification, the system is currently programmed to find any other programs within three months that are also due for recertification and mail out one renewal packet for the programs. The purpose of this design was to make the renewal process easier for households by requiring them to complete one form at one time, rather than multiple renewal packets within three months. However, in practical terms, this means that if a household has a RIW certification period ending September 30th and a SNAP certification period ending December 31st, one renewal packet, combining both programs will be mailed out on August 1. Unfortunately, this means that the NOE for SNAP is mailed out too early. To address this issue, all renewals will be aligned to the SNAP certification period. The system fix to address this issue is being prioritized. The SA hopes to have the fix implemented in the January release.

The issue of sending the NOE too late appears to be related to the overdue recertification issue, in which cases that were kept open without a proper recertification, were not mailed out a renewal packet with the regular renewal mailing on the first day of the next to last month of the certification period. This issue has been procedurally addressed in September 2017, in that the trigger for the mailing of the SNAP renewal packet has been set to coincide with the date of application. This ensures that all cases are sent the renewal packet with the monthly DHS-1010 notice batch.

Responsible staff: RI DHS Director, Courtney Hawkins; RI DHS SNAP Administrator, Iwona Ramian

Finding #A.14 (New): Failure to follow appropriate interview procedures at recertification

Required Corrective Action: The SA must implement procedures to ensure that interviews are conducted during the recertification process. Eligibility workers must also be provided with training on how to adequately and consistently document completion of the interview.

State's Response: The SA staff are being reminded of the process of interviewing requirements and in documenting the interview and all aspects of case processing in the case notes as part of the daily staff huddles and meetings with supervisors. These requirements are also discussed with new eligibility determination staff as part of the SNAP training. The DHS Policy Office will draft an updated procedural memo on the interview requirements to share with all staff by the end of January 2018. The SA is also working with Deloitte to develop a step by step guide that will remind staff how to properly schedule and document the interview in the system. This will be included with the procedural memorandum transmittal and shared with FNS.

Responsible staff: Associate Director of Policy, Maria Cimini; Zulma Garcia, RI DHS Administrator for Training; RI DHS SNAP Administrator, Iwona Ramian; Associate Director of Field Operations, Maureen Donnelly

Finding #A.15 (New): Applications for recertification are not processed timely

Required Corrective Action: The SA must ensure that all applications for recertification are processed within required timeframes. This includes notifying households of eligibility determinations prior to the end of their certification period and issuing benefits to eligible households on the normal benefit issuance date. As stated under Finding #A.12 above, according to the most recent weekly data provided by DHS (dated August 28, 2017), there are a total of 12,919 unprocessed applications for recertification pertaining to SNAP. It is FNS' understanding that a portion of these households might have been closed at the end of their certification periods (as opposed to the households described in #A.12). In its CAR, the SA must submit a detailed plan of action describing steps that it will take to decrease its backlog of unprocessed recertification applications by 50% within three months of receipt of this report and to eliminate the backlog within six months. The SA should also identify steps that it has taken or will take to ensure the timely processing of recertification applications so that backlogs do not arise in the future.

State's Response: As indicated in the State's Response to Finding #A.12, the SA's DHS Director is currently working with FNS on the plan to address recertification backlogs including all aspects of the recertification process and the resulting unintended consequences. The SA has submitted an initial draft plan. The SA will submit an updated plan for the recertification backlog by the end of December 2017.

As noted in previous responses, the state has created a staff workgroup to review the state's processing procedures as it related to all SNAP case processing tasks, including initial applications, recertifications, interim reports and case changes. Current recertifications are being processed by state eligibility technicians as they come in. Additionally, any cases that have unworked recertifications at the end of the certification period are not issued benefits until their recertification process is complete and the household is deemed eligible for continued participation in SNAP. The system changes to ensure that cases are not kept open beyond their certification period went to effect in September 2017. The state's data team as well as field supervisors and DHS leadership are provided weekly data reports showing the total number of received renewal forms, the number

of worked cases, the number of cases awaiting client action, and the status of the recertification process. This allows staffing resources to be switched as appropriate to ensure that recertifications are processed by the end of the certification period.

DHS Responsible staff: Associate Director of Field Operations, Maureen Donnelly

Finding #A.16 (New): Failure to provide a full month's allotment for State-caused delays in processing recertifications

Required Corrective Action: The SA must ensure that all recertifications are processed within required timeframes and clients are provided with the correct allotment for the first month of the new certification period. The SA must conduct additional trainings with eligibility staff to ensure that tasks are completed correctly.

State's Response: The processes and procedures involved in processing recertifications will be reviewed with all staff during the morning huddles. Additionally, staff specifically assigned to processing the recertification backlog will be provided written training materials on how to process the recertifications properly in the new eligibility system. There will be a focus on processes to ensure appropriate benefits levels are issued.

Training plans and documents for the training will be sent to FNS within 60 days.

Responsible staff: Associate Director of Field Operations, Maureen Donnelly; Associate Director for Policy, Maria Cimini

Finding #A.17 (New): Failure to issue a periodic report form

Required Corrective Action: The SA must develop procedures to ensure that all clients are provided with a timely periodic report form. This should include establishment and adherence to a consistent timeframe for running batches and printing and mailing forms and notices.

State's Response: Failure to issue the periodic report form (Interim Report) is directly attributed to the overdue recertifications. The new system is programmed to include a case end date. The first case end date is the Six-Month Interim Date or Mid-Certification Date (depending on whether the household is subject to simplified reporting or change reporting.) The second end date on the case is the certification period end date. If they certification period end date is not enforced, the case is allowed to stay open past the certification end date although the recertification process is not complete, the case end date does not update to the interim date. As a result, the Six-Month Interim Report is not triggered on the case.

While the SA works on implementing a permanent solution to this issue, it has changed the trigger conditions for the period report. The Interim Report is triggered based on the application date and type of reporting household (simplified reporter). The system has also been updated to allow the Interim Report process to occur even if the recertification process has not been completed.

The SA's DHS Director is currently working with FNS on the plan to address recertification backlog issues, including all aspects of the recertification process and the resulting unintended consequences, such as the interim report not being mailed out. An updated plan will be provided to FNS by the end of December 2017.

Responsible staff: RI DHS Director, Courtney Hawkins; RI DHS SNAP Administrator, Iwona Ramian; Associate Director of Field Operations, Maureen Donnelly; Chief Operating officer, EOHHS, Ben Shaffer.

B. State Level Program Access

Finding #B.1 (New): Failure to conduct client complaint analysis

Required Corrective Action: The SA must ensure that complaint records are maintained and must complete an analysis of all client complaints annually, at a minimum. The SA must develop clear written procedures for analyzing the complaints and must provide adequate training to all agency staff members that would have a role in the complaints process. The SA written procedures must address the following:

- How often the SA will complete an analysis of its client complaints;
- Who will be responsible for the analysis;
- How the data will be analyzed; and
- Who will be responsible be developing and providing training to agency staff.

The SA must also provide FNS with a copy of the completed analysis and what actions were taken to address any patterns of problems indicated by the analysis.

State's Response: RI DHS has a complaint tracking procedure in place that has fallen out of use since the launch of the new eligibility system. Due to the challenges of the roll out of the new IES and the reorganization of significant positions in the Department, the existing complaint tracking procedure was over looked.

To ensure compliance with this finding, the SA will update the procedural memo and ensure procedures are put into practice at all DHS field offices. All Staff will be provided training on the complaint process, and a staff member will be assigned to collect and analyze all complaints.

This process is planned to be completed by the end of February 2018.

DHS Responsible staff: Associate Director of Field Operations, Maureen Donnelly; Maria Cimini, Associate Director, Policy; Zulma Garcia, Administrator for Training

Finding #B.2 (New): DHS does not have effective procedures in place to provide timely service to clients

Required Corrective Action: The SA must ensure that clients have timely access to service whether they seek assistance through the call center, the online portal, in-person at a local office, or through any other means offered by DHS. The CAR must provide details on how the SA will continue to bring down wait times at the call center as well as a plan to address field office wait times and overcrowding. The CAR must also provide an update on online portal functionality and any actions that are being taken to increase its utilization.

State's Response: The SA will put together an internal committee to analyze and address access issue across all avenues at DHS.

The RI DHS Integrated Voice Recognition (IVR) software has been update and moved to a more stable platform which offers more automated access to case level information. The intent is to allow customers who have questions that can be answered by data available from the IVR such as appointment dates and times, benefit amounts, case statuses, missing documentation, EBT balances, etc., access to quicker answers to their questions. The new call center staff are continuing to receive benefit program training and continue to improve their skill set with regards to servicing the topics that the clients are calling the call center. The call center has moved to a case note system that allows calls to be more easily tracked and captured to the appropriate case. The new Data Analyst has been tasked with analyzing call center data as well as reasons for office visits, so that adjustments to services can be made to ensure that the customer service is targeted and effective. As the ability of the staff to process cases timely and accurately increases, it will reduce clients' need for contact with the department. As backlogs decrease, access to benefits and services should increase.

In an effort to streamline lobby visits, the SA has launched a pilot Kiosk program. The Kiosk is computer check-in station located in the lobby that serves as the first point of contact by the client with the agency. The client can indicate the reason for their office visit, and the system will put the client in the correct queue to see a staff member, issue an appointment, or provide a receipt of documentation or an application is being dropped off. The Kiosk has been launched in one field office – Warwick. To date, the pilot has revealed that the concept is helpful – it allows some clients to conduct their business at DHS more quickly and efficiently, and allows for better management of the lobby flow. It moves people quicker through the line and assigns clients to proper queues if further assistance beyond the Kiosk is necessary. However, the Kiosk pilot has also shown the shortcomings in the current technology and software that it utilized. Improvements are being made to the technology as well as the software to make the Kiosk more efficient, faster, and more user friendly. The SA hopes to launch the Kiosk at all field offices by the Spring. In the Providence office, where DHS sees its highest volume of recipients, DHS has opened a second lobby to serve SNAP recipients. This has reduced wait times for customers in this office.

The SA has also gone out to bid for a lobby redesign and management service, to reconfigure the present lobbies physically to ensure maximum and efficient space utilization but also to redesign the flow of the lobbies as well as provide a system to track visitors, their reasons for the in office visits, and allow the SA to better manage the lobby work that these visits create. The SA hopes to award the contract for this bid by the end of February 2018.

The online customer portal has undergone many updates and changes since the launch of the new system. The technology has been updated to make navigation faster and easier, and text has been edited to allow for easier completion of applications, uploading of documents, and case management of online customer accounts. A client can apply for SNAP benefits by completing the online application and the department does receive a small percentage of all new applications through the customer portal. DHS will provide FNS with an analysis of the customer portal data by the end of January 2017.

DHS Responsible staff: Associate Director of Field Operations, Maureen Donnelly

Finding #B.3 (New): RI DHS-2 is missing required language regarding verification of information

Required Corrective Action: The SA must revise the DHS-2 application to incorporate the required language. Please provide a copy of the revised DHS-2.

State's Response: A corrected version of the DHS-2 is completed and is pending approval from our umbrella agency, EOHHS for the Medicare portion of the application. The SA will submit a copy of the updated application for FNS review by the end of December 2017.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

Finding #B.4 (New): RI DHS-2 is missing the Income and Eligibility Verification System statement

Required Corrective Action: The SA must revise the DHS-2 to include the IEVS statement. Please provide a copy of the revised DHS-2.

State's Response: A corrected version of the DHS-2 is completed and is pending approval from EOHHS for the Medicare portion of the application. The SA will submit a copy of the updated application to FNS by the end of December 2017.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

Finding #B.5 (New): Failure to notify households at the time of application of the methods available to request a fair hearing

Required Corrective Action: The SA must update the DHS-2 application to include language that informs the household of the method by which a hearing may be requested. Please provide a copy of the revised DHS-2.

State's Response: A corrected version of the DHS-2 is completed and is pending approval from EOHHS for the Medicare portion of the application. The SA will submit an updated copy of the application to FNS by the end of December 2017.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

X. Observations and Suggestions

A. Local Program Access Observations

Observations #A.1: FNS observed extremely long wait times for clients visiting the Providence Office. In addition, DHS only tracks wait times from when the customer is checked-in by the greeters, even though clients often experience significant wait times prior to reaching the greeters.

Suggestion: FNS suggests that DHS develop a better method to track clients' actual wait times from the time they arrive at the office. FNS is aware that the SA is looking into kiosks for the field office to allow for greater self-service by clients. FNS is available to provide technical assistance to the SA to develop a more efficient method.

State's Response: As mentioned above, the Kiosk has been piloted in the Warwick office and has not been as successful as it was planned. It will not be rolled out to Providence and other offices until improvements have been made. The Department is working with the Vendor, Deloitte to make improvements to the programming of the Kiosk system. The department is also looking forward to awarding the lobby redesign contract by the end of February 2017, so that changes can be made in the lobby design to ensure clients do not wait long in adverse weather conditions, clients are tracked from the moment they get into line at DHS, and data can be provided to analyze so that the SA provides better customer service to its clients. Additionally, the Department has opened a second lobby in Providence to serve SNAP recipients and reduce wait times.

DHS Responsible staff: Associate Director of Field Operations, Maureen Donnelly

Observation #A.2: As noted under Finding #A.3 above, FNS reviewers discovered instances during the case file review in which documents submitted by households were indexed incorrectly. For example, separate recertification applications were indexed as an appeals-related document and as a birth certificate.

Suggestion: FNS recommends that the SA develop clear procedures and training for staff that are scanning and indexing documents to ensure that documents are being scanned and indexed correctly.

State's Response: RI DHS is currently developing re-training plans for the scanning staff in order to raise their scanning skill set. Daily and ongoing supervisory level training for unit staff and individuals is conducted by the unit supervisor as needed or required. Drop down menus and words have been simplified and reduced whenever possible, to ensure that indexing of documents is easier, efficient, and accurate.

Additionally, a QR code separator sheet was implemented in July 2017 for the scanning center. The sheet is inserted with each document. The system reads the QR code and the document is sent to the correct queue. The result has been fewer misfiled documents. The scanning center supervisor conducts daily spot checks on scanned documents for accuracy.

The SA is also planning a visit to the Connecticut scanning operations and DHS offices to learn best practices in order to improve our scanning capabilities, processes, and procedures.

DHS Responsible staff: Administrator, George Bowen

Observation #A.3: FNS reviewers discovered two cases in which duplicate accounts were created for the same household members. FNS identified this as one cause for some of the case processing delays. This adversely impacts the accuracy of the eligibility determination because it is likely that the case could be processed without all the pertinent information if the eligibility worker is unaware of the need to search multiple cases. Additionally, having to search multiple cases for documentation adds to processing time.

Suggestion: FNS recommends that the SA develop clear, written guidance and training to all eligibility workers and clerical staff on how to properly identify an existing case at the time of intake and correctly associate application materials and other documents with an existing case record.

State's Response: RI DHS is currently conducting a program to merge individuals who may have multiple individual member IDs. DHS staff are identifying these individuals, correcting any erroneous ID data and merging them into one, correct member ID. When that person's individual data is updated, all DHS cases associated with that person will also be updated. This does not apply to case level data. The staff will need to update all applicable cases when that level data is presented. Staff will all be reminded of the need to search and update cases associated with case level data when appropriate.

The SA is continues to work with Deloitte to ensure that the system flags potential duplicates in an easy manner that can be efficiently addressed.

DHS Responsible Staff: Associate Director of Field Operations, Maureen Donnelly

Observation #A.4: At the time of the review, RIBridges lacked the functionality needed to complete the required FNS-366B report. State staff members were aware of the changes to the FNS-366B and had provided system specifications to the system vendor; however, the functionality had not been implemented.

Suggestion: The State should ensure that the development of the report functionality needed to complete the FNS-366B is prioritized. FNS will continue to monitor the issue and is available to provide technical assistance to the State as needed.

State's Response: The RI DHS continues to work with the vender, Deloitte and the two contributing units, the Fraud Unit and the Hearing Office on the 366B data. The hearing office software is being worked on to make improvements in the data collection. The 366B data pertaining to the applications and recertifications appears to be correct for the process. Ongoing data accuracy issues are continuing to be addressed by the SA with the vendor, Deloitte, as they arise.

DHS Responsible Staff: Iwona Ramian, SNAP Administrator; Bill O'Donnell, SNAP Corrective Action Specialist

Observation #A.5: FNS reviewers identified cases in which eligibility was authorized by user accounts that were not uniquely identified with a particular worker, leading FNS to believe that these actions were taken by non-merit staff. Federal regulations at 7 CFR 272.4(a)(1) state that *"State agency personnel used in the certification process shall be employed in accordance with the current standards for a merit system of personnel administration..."* The regulation further clarifies that *"Volunteers and other non-State agency employees shall not conduct certification interviews or certify SNAP applications."* Under no circumstances can contracted vendor employees conduct eligibility interviews or process cases in RIBridges.

This issue was first identified in the RI Advance Notification CAP response sent from FNS to the State on December 19, 2016 and was identified again during a one-day case file review conducted by FNS NERO on January 25, 2017 and brought to the State's attention the subsequent day. In a letter that was sent to FNS on January 31, 2017, the SA indicated that all SNAP Admin accounts and over 700 user accounts associated with the testing and pilot phases of RIBridges had been disabled. FNS acknowledges that the sample timeframe for our June review overlaps with the time period during which these corrective actions were taken by the State. We are categorizing this

issue as an observation instead of a finding because, although it was identified during this review, we believe this issue to have been addressed by the actions taken by the State prior to the review. However, FNS remains concerned about the potential for this issue to reoccur.

Required Corrective Action: The State agency should develop procedures, including the generation of regular activity reports, to monitor user accounts that are associated with eligibility determinations and other activities reserved for merit personnel. Reports should be reviewed frequently to identify and address any irregularities. In its CAR the State should identify controls that are in place to govern user account creation and limit access to particular system functionality.

State's Response: The SA is currently and has been working with state technology security staff and with the vendor, Deloitte, to ensure that only merit staff are processing and making eligibility determinations on SNAP cases. A report of users and their assigned roles is currently being generated. Department and state IT security staff are reviewing this report and developing plans for ongoing maintenance to ensure that federal requirements are sustained. The State's IT department is developing and expanding monitoring roles to ensure the integrity and security. The SA is also reviewing HR records and staff assignments to ensure that the correct individuals are assigned the proper roles in the system.

DHS Responsible staff: Sally McGrath, Assistant Administrator for IT; Sarah Aw, Associate Director for IT Operations

B. State Program Access Observations

Observation #B.1: FNS identified that the SA's NOE and the recertification form language are not consistent regarding information on alternative submission methods available to the household. The NOE states that the recertification form may be submitted in person, but does not provide the address of the local offices. It also indicates that the application may be submitted by mail, but the address is only provided in the upper left-hand corner of the page. The NOE also notes that the application can be submitted by faxing it to one of the field offices. The recertification form, on the other hand, includes the mailing address and provides a link to view the office locations. It also references the online portal.

Suggestion: The SA should revise the NOE and recertification form so that the language for the submission methods available to households is consistent.

State's Response: As previously mentioned the SA's notice team is currently and has been working with the state's vendor, Deloitte to ensure that all of the notices for the SNAP and other programs are compliant with federal regulations and meet the needs of the SA and the clients. As the notices are finalized, the SA will update FNS NERO during regular weekly contact and provide the finalized templates.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

Observation #B.2: Of the 40 fair hearing case files that FNS reviewed, 33 did not contain the NOAA. Without the NOAA, FNS was not able to determine if the fair hearing decision adequately addressed the fair hearing request reason.

Suggestion: The SA should ensure that the NOAA is included in the fair hearing case file record.

State's Response: The Department is working to develop a process that ensures that the NOAA is attached/ associated with the hearing request for appeal and saved in the appropriate hearing record. Currently, the entire appeals functionality in the system is undergoing changes and improvements, to ensure the processes are efficient and compliant with policies and regulations. Most of the improvements to the Appeals functionality as slated for the January and March 2018 releases. Within 60 days, or at the request of FNS, the Department can provide an update on the status of this process.

Responsible staff: Jane Morgan, Associate Director

Observation #B.3: The Notice of Eligibility lists the client's certification period from a certain date to "ongoing." For example, one notice read that the client was eligible from 06/01/2017 to ONGOING. This could be taken to imply that the household's certification period does not have a specific end date. Later in the notice, the household is informed that its SNAP eligibility period is approved through a certain month, at which time, the household would need to recertify to continue receiving benefits.

Suggestion: The SA should revise its Notice of Eligibility by removing the term "ongoing" and specifying the end date of the certification period in its place.

State's Response: The SA's notice team is currently and has been working with the state's vendor, Deloitte, to ensure that all of the notices for the SNAP and other programs are compliant with federal regulations and meet the needs of the SA and the clients. As the notices are finalized, the SA will update FNS NERO during regular weekly contact. A ticket has been written with the vendor to address this particular issue. The issue will be raised and tracked through the SNAP Problem Management meetings. Updates on this observation will be provided to FNS as requested.

DHS Responsible staff: Maria Cimini, Associate Director, Policy; Iwona Ramian, DHS SNAP Administrator

Open Findings

The following are findings from previous FNS ME reviews that are still open. As a reminder, FNS cannot close a review until corrective actions have been implemented for all findings and FNS has validated the implementation. Additionally, some open findings require the State provide updated information as requested below.

A. Local Program Access:

Finding #L.1 (Open): Notice of Adverse Action does not comply with Federal regulations

Required Corrective Action: SA must ensure the language included on the NOAA is compliant with 273.13(a)(2) by explaining in easily understandable language an accurate reason for the proposed action. System issues appear to account for the majority of the NOAA issues; however, in some instances the worker might have taken an incorrect action in the system that resulted in an inaccurate NOAA. The State must provide an update on system defects related to NOAAs.

The State must provide a comprehensive training for all eligibility staff on correct notice procedures in RIBridges.

Status: This was a finding from the FFY 2015 Newport LPAR review. The SA's CAR indicated the notice issues would be addressed with the new RIBridges system. FNS is aware that a new Notice of Adverse Action was put into production when RIBridges went live. FNS identified the same issues with the notice from the previous review; therefore, this will remain an open finding until the State provides documentation to FNS validating that the finding has been addressed.

State Response: The SA is working on updating its Negative Action Process. It will provide FNS with a copies of the functional design documents as well as the new templates.

DHS Responsible staff: Maria Cimini, Associate Director, Policy; Iwona Ramian, DHS SNAP Administrator

B. State Program Access:

Finding #S.1 (Open): Notice of Required Verification does not conform to Federal regulations

Required Corrective Action: The SA must revise its Notice of Required Verification to provide an explanation of the period of time that the requested verifications should cover. As part of the SA's CAR, please provide a copy of the revised notice prior to production.

Status: This is an open finding from the FFY 2015 State Program Access Review. The SA semiannual CAP indicated that the State was working on updating and correcting notices in RIBridges. FNS is aware that the SA has developed new notice templates for RIBridges. However, FNS identified the same issue with the Notice of Required Verification during the current review; therefore, this finding will remain open until the State provides documentation to FNS validating that the finding has been addressed.

State Response: The SA will update its Notice of Required Verification and provide an updated template to FNS by the end of January 2018.

DHS Responsible staff: Maria Cimini, Associate Director, Policy

Finding #S.2 (Open): SA Fair Hearings exceed federally mandated time limits

Required Corrective Action: The SA must ensure that all fair hearings are scheduled, conducted, decided and all parties involved are notified of the hearing decision within 60 days from the date of the request. The SA must also ensure that the fair hearing case files are adequately document when all parties are notified of the hearing decisions.

Status: This was an open finding from the FFY 2015 State Program Access Review. FNS is unable to validate that the finding has been adequately addressed due to the issues noted above; therefore, this will remain an open finding until the State provides documentation to FNS validating that the finding has been addressed.

State Response: The hearing office is currently reviewing and revising the process of receiving and scheduling hearings in order to ensure that all hearing requests are compliant with federal regulations and are scheduled within applicable guidelines and the overall time line is in compliance. The SA had a setback with hearings when the system vendor uncovered thousands of documents that were scanned but unassigned in the system. As mentioned, system changes as well

as procedures have been updated to ensure that documents are properly assigned to the correct case.

The hearing office is working with the field staff to ensure that all hearing requests that are received are addressed by field staff and are sent to the hearing office in a timely manner and the timelines are followed.

Improvements will be tracked by the hearing office and will be reported as progress is realized.

The SA will develop appropriate new procedural memorandums and training materials to explain the hearing procedures. The SA anticipates to have new materials available for FNS review by the end of March 2018.

In the interim, the hearing office staff meets weekly with the vendor Deloitte, to address system issues affecting fair hearings and appeals. Most issues have scheduled fixes in the January and March system releases.

Responsible staff: Hearing office, Jane Morgan, Associate Director