

Rhode Island Supplemental Nutrition Assistance Program (SNAP)

Update on the Unified Health Infrastructure Project (UHIP) Corrective Action Plan (CAP)

December 12, 2017

Section 1: Correct System Technical Problems

FNS QUESTION: Within 30 days of this response, please provide additional details regarding specific steps the State is taking to implement the Short-Term Action Plan identified on pages 16-19 of the Assessment, as well as additional details regarding the metrics the State had adopted to increase its oversight of Deloitte as outlined on page 20.

STATE RESPONSE: The State has implemented each of the items listed in the Short-Term Action Plan.

Governance

The Secretary of the Office of Health and Human Services continues to serve as the overall project lead, with the Director of the Department of Human Services (DHS) as the UHIP lead for the department. DHS has also restructured its senior leadership team to streamline policy, training, and program operations. The Department has also hired additional staff to help manage the project, including a Director of Project Management, an Associate Director of IT, and a Chief Program Development Officer. The State is also utilizing Information Technology project managers to help with the project organization. Consultants have been hired to assist the Department in validation testing and data integrity review. Key Performance Indicators are in place and regular meetings are held between key vendor leadership and state leadership to assess program, performances, and status. Payments to the vendor continue to be withheld while work is done to stabilize the system, verify data and improve system performance.

Technology

Both the State and Deloitte have substantially increased technical capacity on UHIP. DHS has hired an Associate Director for IT, a data analyst, project manager, and a chief program development officer. In addition, DHS is utilizing contractors to provide data analytics as well as technical assistance. Bi-weekly meetings are held between state technical and program staff as well as the Deloitte counterparts to review SNAP issues. Weekly prioritization meetings are held to review JIRA tickets and review progress of tickets. Monthly fixes continue to be implemented to address the most critical system issues with large scale releases planned for March and June 2018.

Operations

The state has made significant improvements in operations with the hiring of new staff, improving the training curriculums, and expanding communications within the department as well as with the community partners and clients. The State has successfully completed the initial hiring surge and filled 143 positions. The Department is now looking to fill additional 86 current vacancies in frontline positions as well as to convert as many of the temporary positions from the initial hiring surge into permanent ones. The training curriculum for new hires continues to be updated and expanded, while refresher trainings for supervisors and managers also continue. The State continues the collaboration with the University of Rhode Island to develop a more extensive training curriculum for supervisors and managers. Training sessions conclude with participant surveys so that staff has a voice in amending training structure, materials, presenters, etc., to make the trainings best serve the needs of the staff and the Department.

The State has initiated its employee engagement plan by launching a monthly staff newsletter as well as conducting state wide, all staff, quarterly meetings, the first of which is happening in the middle of December. The newsletter as well as the meetings provide an opportunity for all staff to learn about all the DHS initiatives, improvements, changes, etc., allowing staff to remain informed and engaged with the Department. The Department is also offering trainings in resiliency, which has been well received with the staff.

The State continues to be in regular communications with its federal partners and is looking to extend and/or regain some of the federal waivers it has received as the waivers have helped with the processing of applications and now that the data is getting to a more stable state, could result in increasing operations efficiency even more.

Stakeholder Engagement

The State continues its work to improve communication with clients by reviewing and updating notices to more user-friendly designs and easier to read and understand text. The State is reviewing the feasibility of using regular e-mails, robo calls, and texts to inform clients about deadlines for submission of forms and documentation. The Department intends to take advantage of the changes in the federal regulations that now allow e-mail notices to be an option for client notification. The State has also launched a new the Interactive Voice Response (IVR) system, which will allow clients to call in and receive automated information about their cases directly from the system, thereby decreasing the need to call or visit offices in-person for routine information. Updates to the IVR platform have made the IVR system more reliable and customer-friendly. In updating the IVR, the Department solicited and received feedback from the community and advocates on the prompts, language, and options in the new system. Advocates were involved in the testing of the new system and provided valuable feedback for improvements.

Advocates and the community continue to be included in Department projects such as the customer portal improvements as well as the Kiosk pilot. Small workgroups continue to meet on a regular basis to discuss challenges, improvements, and issues with the system as well as with the services offered by the Department. Advocates and community organizations have a central phone number and e-mail address they can use to report issues and receive assistance. While the current processes are not optimal, the Department is exploring other avenues for advocates and the community to receive the assistance they seek. The State will be participating in site visits to other state's SNAP programs to learn best practices in areas such as scanning, call center, and community partner inquiries.

The State is very appreciate of the collaboration, support, and assistance it receives from its federal partners and intends to continue the collaboration and regular communication so that the federal partners stay informed and are provided with opportunities to directly engage in the work the State continues to do to move the Department forward to best serve customers and provide timely and accurate benefits.

FNS QUESTION: As the State works to strengthen its State IT project management (as referenced in the Assessment), we encourage the State to identify additional thresholds that will more accurately reflect an issue's priority.

STATE RESPONSE: The State has made adjustments to JIRA, the incident management system, to reflect, to better reflect the nature of the issues, their impact, and need for a resolution. The State has added improved labels to tickets, easily identifying them to particular programs and functionality, and assigning priority levels so that prioritization is recognized in releases. Regular weekly meetings between the State and Deloitte allow for the vetting of issues and a balanced discussion on the expectations, technical and functional details, as well as needs of the Department and proposed best approaches to resolution. The State is also working on improving the ticket writing process to allow for accuracy and more in depth analysis and testing. Program administrators are involved in the prioritization of tickets, drafting of business requirements, and analysis of system and program needs.

Section 2: Address Ongoing Training Needs

FNS QUESTIONS: Within 30 days of receipt of this response, the State must provide FNS with an updated in-depth training plan that addresses training for both new hires and existing workers in SNAP policy and in RIBridges. The training plan(s) should include a method for assessing the participants' grasp of the information and readiness to perform the required tasks as well as a timeline by which staff will be expected to complete the training. The State must also provide FNS with any training materials that are developed as part of the new plan.

STATE RESPONSE: The State continues to use the training plan provided in the previous CAP update to train new hires as well as provide the continuing refresher trainings to current staff. The Staff Development Unit is working on updating all training materials to reflect all new procedures and policies changes as a result of the Big Rule changes in the federal regulations as well as State Options and changes to business practices. The Department is aiming to have all new updates incorporated into the existing training modules by the end of January.

Section 3: Improve Business Processes

3.1 Productivity Targets: No additional information required at this time.

3.2 Case Assignment Process:

FNS QUESTION: Please keep FNS informed regarding the rollout of the worker inbox, including any significant anticipated delays, and any improvements made to the distribution of daily assignments.

STATE RESPONSE:

The worker inbox is regularly utilized by workers in five of the six field offices, with some supplementation of daily list assignments. Deloitte has brought in additional expertise and the State is currently working with the new team in design sessions. Improvements to the worker inbox are slated for the March release. They include simplifying the number and type of tasks, refreshing of worker dashboard for rapid prioritization and identification of work, streamlining task assignment to workers and enhancing the inbox and task search capability.

FNS QUESTION: Please provide additional, detailed information about how the State is managing the scheduling of all interviews whether they are generated by the lobby or non-lobby (this includes expedited, non-expedited, and recertification interviews). For the cases where interviews are not scheduled within statutory and regulatory timeframes, please provide corrective actions the State will take to comply with statutes and the date by which the State anticipates being in compliance.

STATE RESPONSE: DHS is currently still using the following procedures for scheduling interviews:

- a. **Non-Lobby interviews:** For new applications and recertification interviews, field staff make a cold call to the client and if there is no answer, the worker leaves a message indicating that the client will receive a subsequent call in 10 minutes. If the client cannot be reached on the second call, an interview appointment letter is sent for a telephone interview unless the client has requested an in-person interview on the application. Efforts are made to schedule all interviews within the federally mandated timeframes, but given the volume of new applications and the current backlog of applications, this is not always possible with the staffing levels we have. Clients coming into the lobbies to drop off applications for expedited service as triaged into a separate queue in which a DHS staff member is able to conduct the interview at drop off. The State has also requested and been granted a waiver to postpone the interview for expedited SNAP. If the customer is not reached by telephone, the expedited SNAP application is processed, with a pending interview. At present, the State is authorized to postpone the interview until the end of the calendar year for 20% of the expedited caseload. The State is working with its data analyst and Deloitte to gather the necessary data to request the waiver be extended or re-granted, as it has had a tremendous impact on processing expedited SNAP application. Another waiver that was assisting us with meeting the regulatory requirements during recertification processing was the waiver that waives the need for an interview at recertification for elderly or disabled households that do not have any earned income. This waiver allowed us to process recertification for these eligible households without the interview, thus freeing up interview times for other clients. The State is in the process of gathering the necessary data so that it may request this waiver again.
- b. **Lobby Interviews:** The process for lobby interviews has not changed. Customers who drop off applications for expedited service are able to complete an interview at the time of application drop off. Customers who wish to see a worker at the time of their office visit are accommodated on a first come, first serve basis. As the appointments for the day get filled up, customers are asked to leave their documents and wait for a telephone interview. Customers may also return to the office at a later date. At present, lobby volumes most often exceed the number of available same day appointments. As such, most customers rely on the telephone interview. DHS has issued a Request for Proposals (RFP) for a lobby management system, in hopes that an extensive analysis of the current state can be conducted and realistic plans can be put into place to help us be in regularly compliance and provide a better, more efficient customer service experience. The RFP is in the final stages of the procurement process and the State anticipates to grant the bid by the end of January.

The State has also written and prioritized a number of JIRA tickets to improve the interview scheduling functionality in the system and Notice of Missed Interview triggers and functionality. The State is also interested in exploring the possibility of the electronic signature waiver, which would allow Call Center staff to process recertification and intake interviews over the phone if a signature is missing on an application. The Department is also committed to eventually have Call Center staff perform on demand interviews for clients that call in and will be exploring this feasibility once the call center volume is stable and staff have been sufficiently trained and on boarded to be able to handle this new business process.

3.3 Application Registration:

FNS QUESTION: Within 30 days of receipt of this CAP response, please provide additional information as to how applications awaiting registration are identified and tracked, as well as the cause of these delays and any actions the State has taken or will take to address this issue. The State should identify a realistic steady state target for the percentage of applications registered more than three days after receipt and a timeline for achieving that target.

STATE RESPONSE: While the State has made significant progress in timely application registration, it has also faced significant barriers of late with the EDM and indexing issues revealed by Deloitte through the found and unassigned documents and applications. The State continues to work closely with Deloitte's technical EDM team to ensure the system is closely monitored for any anomalies when it comes to application registration and indexing. State staff is monitoring scanning and indexing queues, and internal procedures have been revised to streamline the process. Changes to queues, language, drop down menus, etc., have been put into place to make the processes more efficient and intuitive. The State has provided extensive training to clerical staff on the application registration procedures and intends to transfer the application registration task to eligibility technicians or other more advanced staff once staffing resource levels allows for this shift of responsibilities. In the interim, more clerical staff has been hired to assist with application registration and indexing, and supervisors are tasked with monitoring system queues and timeliness numbers.

3. 4 Multiple Applications:

FNS QUESTION: Please confirm when the system logic referenced in the supplemental response has been completed.

STATE RESPONSE: Several system fixes have been implemented in the last few months to better screen for multiple applications and prevent duplicate participation. The MCI clearance functionality is particular has undergone several improvements. In addition, changes to the household composition logic and screening of individuals who must be considered as part of the SNAP household have helped decrease the instances for multiple applications being filed and multiple cases from being created.

3.5 Timely Application and Interim Report Processing:

FNS QUESTION: The State must provide FNS with a timeline that includes specific benchmarks for reducing and eventually eliminating all document processing backlogs.

STATE RESPONSE:

State has implemented QR code readers to more efficiently scan and index all documents upon receipt automatically, including returned mail. The State has also put into place specific scanning protocols and procedures to ensure that documents are scanned timely and properly into the system.

As FNS is aware, the State experienced a significant increase in unprocessed documentation when Deloitte revealed that approximately 24,000 documents were scanned into the system but not properly indexed into the appropriate case. In short, the documents were not viewable in the system by workers. About half of these unassigned documents were connected to a SNAP case. The State prioritized the processing of applications and appeals out of these documents and indexed the remainder into the cases with tasks to be worked by staff. A few months later, Deloitte again revealed that it had improperly indexed a number of new applications that prevented a subset of them to be worked by staff and allowed them to be missed on application backlog data trackers. The State has allocated significant resources to work through the unprocessed documents, in particular the applications and appeals, and has made significant process. All found applications have been reviewed and any available for DHS processing have been processed. Staff have also made significant strides in identifying the appeals that have not been scheduled for a hearing and resolving many of them informally. These two issues have prompted the State to analyze the EDM functionality and identify as well as prioritize system issues that have hindered processing. Many improvements to Appeals functionality, queues, and EDM issues are slated for March and June releases.

As mentioned in the CAP for the June 2017 Combined Review, the State is working internally to draft an updated plan to process the recertification and interim report backlog. The State anticipates to have an updated plan sent to FNS by the end of December. In the interim, changes have been made to the negative action process to ensure federal compliance with timeliness and accessibility to benefits.

- **Closures related to interim reports (form DHS -1046) and recertifications (form DHS-1010):**

FNS QUESTION: Within 30 days of receipt of this CAP response, the State must provide additional information regarding efforts to identify and address the root cause(s) of the high number of interim reports and recertification closures, which should include an assessment of the impact of scanning backlogs on timely recertification and interim report processing.

STATE RESPONSE: The State continues to analyze the recertification and interim data to understand the total impact of the cases which have unprocessed recertifications but benefits were allowed to continue to issue. To date, we know that one of the unintended consequences of these actions was that recertification packets and interim reports were not being correctly generated and mailed out, while closures occurred on cases. The system also prevented the triggering of interims if the recertification process was not properly completed, thereby inserting case ends dates at

interim rather than certification period end date. Several system fixes have been executed to mitigate the issues caused by the unprocessed recertifications, and the State has made changes to its negative action process.

The State has always had a large number of recertifications and interim reports not returned by clients, who end up reapplying the next month. The State is looking to analyze this data so that it can draft a plan to decrease this churn effect.

It should be noted that the State has identified both a system and training issue with the packet received date fields in the system. One of the system issues is that the packet received date is being sometimes overwritten when another program is also going through a recertification process at the same time as SNAP. Additionally, scanning and indexing staff appear to be imputing incorrect document received dates into the system, using the scan date rather than the date stamped date of the document. Training materials are being developed to address this gap in process, which should be distributed to all staff by the end of January 2018.

Unfortunately, the number of returned mail remains high. This returned mail may potentially contain interim reports and recertification packets that were mailed to clients but which have not been received by the clients, and hence have not been able to be returned to the State. With the proposed improvements to the scanning procedures as mentioned below, the State hopes to analyze and address the unreturned mail issue and has made small improvements, one of which includes the QR reader for undeliverable mail. The State is working with Deloitte and a contractor to analyze the system data to determine why so many addresses appear to be incorrect. An address validation tool is slated to be incorporated into the system in one of the Spring releases. While this will not prevent mail from going to an old address, it will prevent mail being sent to an address that doesn't exist.

- **Scanning and indexing delays:**

FNS QUESTION: Within 30 days of the receipt of this CAP, the State must provide additional information on the steps that have and will be taken to address the scanning backlog and include a timeframe for eliminating all backlog. The State should include additional information on the root cause and steps that have been taken to resolve the underlying issue and process the documents that were affected.

STATE RESPONSE: Currently, the State is able to keep up with scanning of incoming new mail and most returned mail. All documents being received by the Central Scanning Center are being scanned into the system within 24 hours and are being indexed into the electronic case files within two days. The State continues to increase the staffing levels in clerical support and eligibility technician positions. Now that the scanning backlog has been eliminated, Central Scanning Center staff have been able to start processing the significant backlog of unreturned mail, with much help of the QR Codes.

The State continues to make system and business processing changes to improve document imaging and scanning capabilities. We have reduced the number of categories for a document type, provided additional training so that staff are following standard procedures, created standard

procedures for forwarding documents from field offices to central scanning; and improved communication and metrics reporting.

As mentioned above, the State is also analyzing the duties and responsibilities of the scanning staff and may amend the positions of the individual assigned to these tasks in an effort to improve efficiency, expediency, and accuracy.

Expedited interview scheduling:

FNS QUESTION: Within 30 days of receipt of this CAP response, please provide additional details regarding actions that the State has taken to meet expedited service requirements and preserve clients' right to file at Providence and other local offices. As available, please include relevant metrics that demonstrate the success of these actions.

STATE RESPONSE:

The State continues to maintain a no wrong door policy, allowing clients to receive assistance in any field office regardless of their residence address. The State continues to offer extended lobby hours on Tuesdays and Wednesdays., and overtime assignments are prioritized, with SNAP expedited application processing being the first item on the list to be done. Greeters continue to screen individuals who come into the offices, triaging them into the appropriate lines/queues, with SNAP expedited being one of the most important screenings. In Providence, a second lobby has been opened to see SNAP clients who have appointments, or need expedited service. The State is making every effort to process expedited applications within the requirement timeframes and has significantly improved in this regard in the last month, with the creation of a team of eligibility technicians exclusively assigned to processing SNAP expedited applications.

- **Recertifications that failed to auto-close:**

FNS QUESTION: FNS requires additional information about this issue and the impacted cases, including the follow broken out by the month in which the recertification was due.

- Total number of cases impacted;
- Root cause, actions taken to address the root cause, and date of resolution;
- Timeframe during which recertifications failed to auto-close;
- Number of cases that submitted an application prior to the end of certification.
 - Include the following information:
 - Current status of case (approved, denied, closed);
 - End date of certification period;
 - Date recertification application was received;
 - Number of months during which the household received benefits prior to action on the new application; and
 - Total over-or under-issuance for failure to auto-close pending the new eligibility determination.
 - Number of cases that submitted an application after the end of certification. Include the following information:
 - Current status of case (approved, denied, closed);
 - End date of certification period;
 - Date recertification application was received;

- Number of months during which the household received benefits prior to action on the new application; and
- Total over-or under-issuance for failure to auto-close pending the new eligibility determination.
- Number of cases that have not submitted an application:
 - Current status of case (approved, denied, closed);
 - End date of certification period;
 - Number of months for which the household received benefits after the expiration of the certification period; and,
 - Total amount of benefits issues after the expiration of the certification period.

STATE RESPONSE: The State has provided additional data to FNS related to this request under separate cover. Discussions on the overdue recertifications and backlog reduction plan continue between the State and FNS.

3.6 Benefits Restoration for Applications Not Timely Processed:

FNS QUESTION: The supplemental response notes that DHS will provide FNS with a report detailing the number of cases that received restoration of benefits, the total amount of benefits restored, and the application date/approval date. This restoration process was scheduled to be completed February 14, 2017. Please provide FNS with a copy of this report.

STATE RESPONSE:

This initial restoration process was not executed as Deloitte has not been able to provide the State with data that can be used to perform the required calculations. The State continues to push Deloitte to provide meaningful and actionable data that can be used to extrapolate the requested figures.

Furthermore, the State has been asked to initiate a second round of SNAP Delay Forms, which asks individuals to submit the form if they have submitted an application in June 2017 or later, for which they have not received a determination. The data from this action will be shared with FNS as it is compiled.

Section 4: Reduce Office Overcrowding and Wait Times

FNS QUESTION: Within 30 days of receipt of this CAP response, the State must provide a plan, with timeline, to accurately assess and address the overall demand at local offices. Also, please provide a copy of the Special Procedures to Assist Elderly and Disabled Customers as noted on page 22, Section 4.6.

STATE RESPONSE:

DHS has piloted the Kiosk in the Warwick office and has issued an RFP for a lobby redesign and management system. While the Kiosk is not ready to be launched statewide, the pilot continues to run, and has provided valuable feedback and assessment. Changes and improvements to the Kiosk design, software, and functionality are currently being scoped out and are slated for the March release. The lobby redesign and management RFP is in its last stages of the procurement process.

The State hopes to have a bid award made by the end of January with work being started in early spring. It is the state's intent that the assessment and recommendations made by the Vendor will help the state design a lobby management system that will decrease wait times, allow efficient flow through the lobby, and provide the necessary data for the state to make changes and smart, efficient improvements based on data analytics.

In the interim, in preparation for the colder weather, lobbies are utilizing the inclement weather lobby plans. In Providence, a separate lobby has been opened which focuses on SNAP, in particular individuals who are coming in for SNAP interview appointments.

Section 5: Address Call Center Outages and Improve Call Center Business Process

FNS QUESTION: Please provide an update on plans to improve call center performance.

STATE RESPONSE:

The Call Center has been centrally relocated to Pawtucket, where it now houses the entire Call Center staff, including approximately 34 eligibility technicians, a senior case manager and at least three supervisors. Consolidating the Call Center into one physical space has helped with oversight and training, supervisors are now able to give consistent information, clearer expectations and uniform instructions. Staff is able to learn from each other, with more senior staff serving as mentors and resources for the newly hired.

In late fall, the Integrated Voice Recognition (IVR) system was updated 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. Approximately 30% of customer calls are served through the IVR. 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. Staff is enrolled in the learning labs and participate in daily huddles where policy changes, system updates, and critical issues are addressed. The call center has moved to a case note system that allows calls to be more easily tracked and captured to the appropriate case. We continue to develop guidelines for the staff on standard procedures for call handling, as well as estimates on call handling and after work time. The State intends to do on site visits with other states in the new year to learn best practices in running a statewide social services call center.

There have not been any outages to the call center in recent months. The number of ports have been increased, which means more people are able to call in and stay in a queue to speak with Call Center staff. Unfortunately, this has also led to issues of calls being dropped once all the ports and queues are full. DHS is currently analyzing this issue and is drafting an updated automated message to be played to callers who call when the ports are full and they cannot get into a queue, clearly explaining to them why they are not able to stay on hold at that time, rather than have the call drop while on hold for a significant period of time.

The Call Center handles approximately 36,000 calls in a month, with the average wait time being about an hour and a half. Agents handle approximately 30% of the calls, while the IVR takes on

about 32%. Unfortunately, approximately 38% of the calls get abandoned. The Department's new data analyst has been tasked with reviewing the call center data to better understand the reasons why customers call so that the State can make the appropriate adjustments and improvements to the delivery of its services, to best serve the clients who come to us.

Section 6: Provide Accurate and Timely Notices

FNS QUESTION: Please provide an update on the blocker issues affecting the Benefit Decision Notices, as well as the issues affecting the DHS-1046 and the DHS-1010.

STATE RESPONSE: As stated in the last CAP update, there are no blocker issues affecting the Benefit Decision Notices (DHS-1605), nor the Six-Month Interim Report (DHS-1046), nor the Renewal Notice (DHS-1010). These notices are being generated and mailed out according to the Notices' schedule.

FNS QUESTION: FNS visited the scanning and print distribution center on February 8, 2017. Information provided subsequent to the visit indicated that the Benefit Decision Notices are not being printed on a daily basis, which FNS has brought to the State's attention. Please provide an update on this issue, as well as additional information regarding the production of notices in general, including any measures that are in place to ensure that the production schedule is timely created and communicated to the distribution center for printing and mailing.

STATE RESPONSE:

The Benefit Decision Notice is being mailed out on a daily basis. No issues with mailings have been reported in recent months.

Section 7: Access to Interpreters and Translated Materials

FNS RESPONSE: *No additional information required at this time.*

Section 8: Ensure Quality Control Process and Program Measures

FNS QUESTION: Please provide FNS with the list of cases pulled as part of the active and negative samples since October 2016 that was referenced in the supplemental response.

STATE RESPONSE: The cases requested have been provided with the previous CAP update. Additionally, the State is working directly with FNS staff on QC related issues and a separate QC CAP is in place.

Section 9: Deferred Functionality Timeline

FNS RESPONSE: *No additional information required at this time.*

Section 10: Issues Not Documented in the CAP:

10.1 Policy Issues:

One such issue was identified on the “RIBridges Top Issues Impacting DHS” weekly report dated March 7, 2017 as “Customer did not receive payment on Heat & Eat.” The number of cases affected was listed as “TBD.” We understand from a recent advocate meeting that there have been widespread issues impacting receipt of the \$20.01 Heat and Eat payment.

FNS QUESTION: Within 30 days of receipt of this CAP response, please provide additional information regarding the total number of SNAP cases affected, the root cause, the timeframe over which issue occurred, and steps take to remedy the issue.

STATE RESPONSE: All prior issues related to the Heat and Eat Payment have been resolved. At present, there are no open issues associated with these payments.

10.2 Recoupment

FNS QUESTION: DHS must provide FNS with a detailed plan for improving claims management that addresses systems issues, staffing, training, and supervisory needs, and includes a preliminary plan for addressing the unestablished claims backlog from InRhodes. The State should refrain from establishing new claims and all collections. The State should also have the capacity and a plan for pursuing these claims if and when FNS indicates it can proceed.

STATE RESPONSE:

The Department has hired a project manager who is tasked with providing an assessment on the Claims, Collections, and Recoveries unit, its staffing, system functionality, data issues, and business processes. A meeting has been scheduled with FNS to discuss the assessment, form a work group for this work and develop a plan moving forward. The State has also voluntarily withdrawn from TOP participation for the next year, and is doing a reconciliation on all TOP debts. The State continues to not establish any new claims and has halted collections. A comprehensive plan will result from the work being done by the project manager and the CCRU workgroup.

10.3 EBT Issues:

FNS needs additional documentation in order to validate the corrective actions that were taken. FNS will initiate follow-up correspondence with the SNAP Administrator and State EBT staff to address the needed documentation and will also include aspects of EBT in Fiscal Year 2017 Management Evaluation.

10.4 Use of Non-Merit Staff for Certification Functions: *No additional information needed.*

10.5 Lack of Case Documentation: FNS will continue to evaluation the adequacy of case documentation during upcoming case reviews. In conjunction with the trainings that are noted, we encourage the State to develop clear expectation and protocols for eligibility worker case notes FNS can provide information to DHS on other State agencies that have successfully improved their worker case notes.

10.6 Cases Authorized by “SNAP Admin”: FNS will validate this corrective action during upcoming case reviews.

Section 11: Data

FNS RESPONSE: *No additional information required from DHS at this time.*