



DEC 19 2016

**United States
Department of
Agriculture**

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

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

Dear Director Depeña:

The Food and Nutrition Service (FNS) has reviewed the Corrective Action Plan (CAP) that the Rhode Island (RI) Department of Human Services (DHS) submitted on November 22, 2016. The CAP was submitted in response to the Advance Notification that FNS issued on November 8, 2016 regarding the State's administration of the Supplemental Nutrition Assistance Program (SNAP). The attached CAP response details questions and comments that DHS must address before FNS can approve the CAP.

Within 30 days of receipt of this letter, please submit a revised CAP that addresses the issues noted in the attached response. We appreciate your commitment to ensuring program access and integrity for all SNAP applicants and recipients. If you have any questions or wish to discuss this further, please contact Bonnie Brathwaite at (617) 565-6397.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Messner".

Kurt Messner
Regional Administrator
USDA-Food and Nutrition Service

Attachments

cc: Yvette Mendez
Iwona Ramian

FNS Response to the Rhode Island Advance Notification Corrective Action Plan

The Food and Nutrition Service (FNS) has the following comments and questions regarding the Corrective Action Plan (CAP) submitted by the Rhode Island (RI) Department of Human Services (DHS) on November 22, 2016 in response to FNS' Advance Notification letter dated November 8, 2016. The State must submit a revised CAP within 30 days that addresses the questions and comments below.

Section 1: Correct System Technical Problems

- 1.1 The "Summary of Corrective Action Plan Items, Assigned Lead(s) and Timeframe" lists a Deloitte representative as the only "Responsible Person" for the first action item ("Correct technical problems with Integrated Eligibility and Enrollment System (RI Bridges)"). To ensure that the State is exercising the appropriate oversight of the system vendor, the State must designate a lead from either the Executive Office of Health and Human Services (EOHHS) or DHS for this action item in addition to the lead from Deloitte.
- 1.2 The CAP notes (page 3), "Priority 2 (P2) defects that may affect large groups of customers, and are thus categorized as blocking issues, were scheduled to be reduced to less than 5 by the end of December and have already been reduced to 4 through a series of software modifications implemented since Go Live." The State must define "large group" vs. "small group" and provide additional information on how the State monitors the vendor's issue prioritization, root cause resolution, and incident recurrence.
- 1.3 In its revised CAP, the State must identify blocking issues affecting large groups (P2 and P3) along with the RIB #s and align them with the three stages of system maturity. FNS considers any blocking issue a high priority.
- 1.4 Page 3 of the CAP also notes, "P3 and P4 defects or data anomalies that affect only a single customer or a small group, and are therefore considered non-blocking, will be reduced to a stable level of less than 250 at all times post June 2017... These levels will deliver a stable operating system at a defect level and within the timeframe that meet or exceed industry standards for a system integration initiative of this scope and complexity." Please provide additional information regarding the specific industry standards that the State is referencing. Are these reflective of any contractually obligated performance standards against which the vendor is being held accountable?

Section 2: Address Ongoing Training Needs

- 2.1 The State recently announced that an additional 35 staff members would be hired to assist with processing. Please incorporate a tentative hiring and training plan into the revised

CAP with expected timeframes. Will these new hires be trained in all programs? Will any of the new hires have a focus in specific programs?

- 2.2. Please confirm that program policy staff will be included in the development of training materials and will be present when the trainings are held. Provide a copy of any materials developed for the Redeterminations & Interims training scheduled for November 28 and the SNAP training scheduled for December 5. For areas in which system defects persist, do the trainings cover both planned functionality and current workarounds? Further, how often will trainings be held? Is it mandatory for all eligibility workers to attend the trainings? How will the State ensure that staff are being properly trained and are competent in the new system?
- 2.3. The State should have evaluations in place for each of the training sessions as a way to monitor overall effectiveness and identify additional training needs.

Section 3: Improve Business Processes including:

- **triage and prioritization of both expedited and non-expedited SNAP cases**
 - **elimination of case backlogs**
 - **restoration of benefits where appropriate**
- 3.1 Please provide additional information regarding the productivity targets. What is the plan for communicating these targets to workers? What happens if production falls below the targets?
 - 3.2 During weekly calls with FNS, the State has indicated that the Worker Inbox is not functioning as it was designed. As a workaround, the State is using Excel-based lists to distribute work to eligibility staff. The revised CAP should include additional information about this process including: 1) how the State is generating the lists, 2) how it is monitoring the distribution and completion of tasks, 3) how interview appointments are being scheduled and conducted, and 4) additional details regarding the “re-vamping” of the Worker Inbox scheduled for January (page 9 of the CAP).
 - 3.3 On page 9, the State indicates that it has put in place a plan for ensuring the registration of scanned applications in fewer than 2 days: “Per the grid above it is based on an average of 183 applications coming in each day and an average of 100 being registered each day, thus every incoming application will be registered within two days.” Please clarify. Based on the information provided, it seems as though a backlog of unregistered apps would grow daily by 83, which would quickly make it impossible for the State to register all applications within two days. The table below illustrates our understanding of average incoming applications compared to the State’s capacity to register applications.

Also, please confirm that the State is preserving the filing date of the application in accordance with 7 CFR 273.2(c)(1).

	Day 1	Day 2	Day 3	Day 4	Day 5
Backlog at Start of Day	0	83	166	249	332
Avg Daily Intake	183	183	183	183	183
Avg Registered Daily	100	100	100	100	100
Cumulative Total Remaining at the End of the Day	83	166	249	332	415

3.4 Based on conversations with the State, FNS is aware of a system issue in which, if multiple unworked applications exist in a case, the initiation of one application could cause the other unworked applications in the case to disappear. Please provide additional information regarding the issue and steps the State is taking to address the issue, including any interim steps that the State has taken to ensure that the date of the earliest application submitted is preserved as the filing date.

3.5 On a near daily basis, client advocates are bringing to the State's attention (and copying FNS on) initial applications and applications for recertification that the State has failed to take timely action on. Yet, the CAP does not provide any information about efforts that the State is taking to address the backlog, apart from indicating that Tom Guthlein and Shannon Massaroco are responsible for determining the number of staff for assignment to a backlog team, which was to be completed November 28. The revised CAP must provide additional information about this team, the proposed plan of action for the team, the target deadline for eliminating the backlog, and a clear description of the backlog tracking system that will be utilized by the team.

3.6 On page 10, the State describes efforts to identify SNAP recipients whose receipt of benefits might not reflect their earliest date of application. The CAP specifies that DHS is analyzing all applications received since Go Live. Is the State also analyzing applications that might have been submitted prior to Go Live (either while InRhodes was still live or during the blackout period) to determine whether there are additional applications that were never acted upon? The State notes that benefit restoration research will be concluded by November 30th and restoration of benefits will be accomplished

during December. In the revised CAP, the State should describe the analysis used to identify these cases, and provide an update on the number of cases that received restoration of benefits, the total amount of benefits restored, the original application date, and the date each application was approved. This information should distinguish between initial applications and applications for recertification.

Section 4: Reduce Office Overcrowding and Wait Times

4.1 With winter weather approaching, FNS remains concerned about the number of visitors to the Providence Office who are forced to wait outside for long periods of time, even after the proposed changes went into effect the week of November 7. FNS staff visited the Providence Office on December 1 and 2, and noted the following issues:

- The location of the two screening clerks forces the majority of the line to form outside.
- There appear to be only two eligibility technicians assigned to Lobby 2, and if further assistance is needed, the recipient is then sent to Lobby 1 to wait even longer to be provided assistance.
- Lobby 2 can only hold approximately 25 people.
- There does not appear to be one staff member whose responsibility it is to oversee lobby operations and make adjustments.
- With the current system in place, clients now have to discuss case details at great length in close proximity of others.

We understand that the State is still in the process of re-configuring the office, and recently learned that Lobby 2 is not efficiently operating at this time. Please include any changes to the plan in the revised CAP as well as a rapid timeline for completing additional changes to the lobby set-up.

4.2 In addition to the above, a footnote on page 10 of the CAP indicates that the Woonsocket and Pawtucket lobbies will be improved based on successful strategies in Providence. Please provide additional information regarding the timeframe for these changes and whether other offices are consistently monitored for overcrowding and wait times.

4.3 During the week of December 5, advocates informed the State SNAP Director and FNS about two different incidents in which clients were turned away from offices and told to return the next day. In one case, when the client returned the following day, s/he was again turned away. The two offices in question were Middletown and Wakefield. FNS staff members have also observed clients being turned away from the Providence Office without a scheduled appointment, which we understand to be contrary to the State's policies. The State must look into these issues and determine whether additional

guidance is needed for local office staff. The revised CAP should include an update on these issues.

- 4.4 Based on onsite observations and conversations with State staff, FNS' understanding is that the tracking of customers only begins once the customer is issued a ticket number, which results in inaccurate wait times and client volume data. Our understanding is that a maximum of only 50-70 tickets are issued per day. On peak days, up to 150+ clients may come to Providence, which means that only a small portion of client visits and wait times are tracked. The State must modify its current tracking system to ensure that all client visits are recorded and wait times are tracked from the time the client arrives at the office, including those that are helped at the windows.
- 4.5 FNS understands that office hours have been extended at certain offices, but the CAP does not address this. Please provide additional information, including how long the State is planning to keep these extended hours in place.
- 4.6 Please indicate in the revised CAP whether any special procedures are in place or are being developed to assist elderly or disabled individuals who visit the offices and might have to wait for extended periods of time.

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

- 5.1 In the initial month or two following Go Live, FNS became aware of issues with staffing at the call centers and lack of program training provided to call center workers. The State had indicated at the time that additional eligibility technicians were being allocated to the call center and that additional training would be provided. Please provide an update.
- 5.2 In the revised CAP, please provide an update on tasks designated for completion by December 19.
- 5.3 Please provide data reflecting the current callback turnaround time for calls received in the call center.
- 5.4 Additionally, further tracking should include the purpose of the call and whether the call resulted in problem resolution. This will allow the State to determine systemic or wide-spread issues, whether call center services are effective, and if further training is needed for call center staff. If the State is currently tracking the purpose of the incoming calls, please provide the most common reasons for client call by volume.

Section 6: Provide Accurate and Timely Notices

- 6.1 On the “Summary of Corrective Action Items, Assigned Lead(s), and Timeframe,” the State lists November 30, 2016 as the completion date for providing timely and accurate notices. Notice issues are tracked on a spreadsheet maintained by Deloitte and the State. According to the most recent version of this spreadsheet provided to FNS dated December 2, 2016 significant notice issues remain. In addition, on November 23, FNS warned the State not to proceed in sending recertification notices (DHS 1010) that potentially contained information from other households. While the State was able to identify a workaround for this issue, it is not clear whether the State and its vendor have been able to address the root cause of the issue. The CAP notes on page 14 that the State will continue to review and improve notices over the next twelve months. We appreciate the State’s emphasis on continuous improvement, but notice issues that could contribute to program access barriers for clients, case errors, and potentially more egregious violations, like the unlawful disclosure of recipient information, must be addressed immediately, and the revised CAP should reflect that.
- 6.2 Comments for the DHS 1010 renewal notice reference only “November 22.” This is the same notice that is referenced in 6.1. These were for cert periods ending December 31. According to the CAP 6,662 renewal notices were generated, which is close to the total number of households up for recertification on a monthly basis. Yet, the State would have had to send DHS 1010 notices in September (for October 31 end certs) and in October (for November 30 end certs). Why aren’t those numbers referenced in the CAP? Why was the issue identified with the DHS 1010 in November (the “other household information”) not an issue when DHS 1010s were sent in months prior to November? Please clarify in the revised CAP.

Section 7: Ensure Access to Interpreters and Translated Materials

No comments.

Section 8: Ensure Quality Control Process and Program Measures

- 8.1 Based on weekly CAP calls between FNS and the State, as well as direct outreach to State Quality Control (QC) staff, FNS is aware that RI still cannot pull a complete QC sample from RI Bridges. The State is not in compliance with Federal regulations. The State must address this in its corrective action plan, providing a detailed analysis of what the issues are, the proposed resolutions, and the timelines for coming into compliance. Once the State has developed the capacity to pull the required samples, FNS needs to

receive evidence that RI is pulling the QC sample correctly, including a list of the sample cases drawn from each frame for each of the last three months.

8.2 The CAP states on page 17 that the National Directory of New Hires (NDNH) interface will be functional by January 27, 2017, yet the deferred functionality timeline in Section 9 (page 19) places NDNH in the second phase of 2017 partner interfaces to be completed in May 2017. Section 4013 of the Agricultural Act of 2014 requires the verification of SNAP applicant wage data through NDNH. Use of the State's Department of Labor and Training wage match as an interim solution does not make the State compliant. NDNH must be implemented along with the Treasury Offset Program (TOP) interface in January.

Section 9: Deferred Functionality Timeline

See 8.2 above.

Section 10: Issues Not Documented in the CAP:

10.1 Policy Issues: FNS has learned of potential system issues reflecting incorrect application of SNAP policy in the areas below. For each potential issue the State must indicate: 1) whether the potential issue has been investigated, 2) the results of the investigation (i.e. was the system programmed to reflect incorrect policy in this particular area), 3) a description and timeline for proposed resolutions, 4) number of cases impacted, and 5) estimated dollar amount of over/under issuances:

- Misapplication of non-citizen sponsorship policy resulting in the exclusion of eligible children.
- Issues with receipt of LIHEAP in October and/or September.
- FY 2017 income guidelines and other COLAs and standards not adjusted timely.
- No minimum benefit issued to 1-2 person categorically eligible households; instead, these households are denied for failure to pass the net income test.

10.2 Potentially Invalid Claims: During a site visit in November, FNS staff identified client overpayments and claims that may or may not be valid debts, which resulted in recoupments that occurred in the month of November. Additionally, we are concerned with the overpayment interface between InRhodes and RIBridges and the accuracy of claims and claim types that reside in RIBridges. FNS is aware that the Claims Unit located at the Providence Office has the sole responsibility of establishing overpayments and also ensures due process is in place by issuing the debtor a demand letter, as required by Federal regulations. It appears that recent overpayments developed were not initiated,

calculated and verified by the Claims Unit and demand letters can't be located for some cases, or in some cases are inadequate. Additionally, access to RIBridges was only recently granted to the Claims Unit and no training in developing overpayments has taken place for Claims staff. On November 29 FNS informed the State via e-mail that further claims development and collection for such claims must stop until the Department has assessed the claims development activity. The State responded that it would comply. FNS also required the State to provide the following:

A summary of DHS' Overpayment Analysis since RIBridges implementation
The number of overpayments/claims developed in RIBridges
The claim type, dollar amount, and overpayment period of each claim
The reason for the overpayment
Copies of demand letters for each overpayment

The State should provide an update on these issues in the revised CAP.

10.3 EBT Issues: FNS has identified and brought the following issues to the State's attention. The revised CAP must address these issues.

- Multiple duplicate accounts.
- Benefits inconsistently applied to duplicate accounts.
- Over issuances.
- Multiple duplicate issuances to the same account.
- Cases not found in FIS.
- Incorrect benefit type codes.
- Damaged card status not updating in RIBridges.
- Unable to remove record from bi_ebt_card table.
- Incorrect supplemental issuances.
- Garbled Demographic and Address data.
- A clean-up process needs to be run for cases where availability date was set as 1/30/2016 to ensure that their benefits don't get expunged in advance. Additionally, a clean-up process must be run for any other availability dates that were backdated to the first of the issuance month.

10.4 Use of Non-Merit Staff for Certification Functions: On December 1, 2016, the State reported to FNS that it had discovered that Deloitte staff were performing tasks associated with eligibility certification functions reserved for merit staff per 7 CFR 272.4(a). The revised CAP should include a description of the issue and any subsequent guidance provided to Deloitte. Provide a summary of measures that are being taken to ensure that the issue does not recur.

10.5 Based upon FNS' review of a sample of cases on November 9 (the results of which have been provided to the State), we are concerned about a lack of case documentation for cases that are being processed in RIBridges. Reviewers noted missing case documents, including applications, as well as a consistent lack of case notes or any notation to indicate that an interview was completed. The revised CAP must address these issues.

10.6 During the review on November 9, FNS also identified cases that were authorized by general UserIDs in the format of "snapadmin1," "snapadmin2," etc. Documentation provided by the State indicates that there is not a unique user associated with these IDs. The State indicated on a call on December 14 that these UserIDs were developed for User Acceptance Testing (UAT). FNS has significant concerns about system security and accountability related to the use of these IDs, and has requested additional information from the State confirming that these general accounts have been disabled and that all workers have been instructed to use uniquely assigned login credentials.

Section 11: Data

11.1 FNS issued a letter to Director Depeña on December 7 outlining additional changes/requests for clarification pertaining to the weekly data reports and the data submitted as part of the CAP (FNS Report-CAP_11222016.pdf). We will continue working directly with State staff to refine the data reports that the State provides to FNS on a weekly basis. In addition to these ongoing reports, please provide the following information in the revised CAP (these were requested in the November 8 Advance Notification letter):

- The number of notices of expiration that were sent in October and November.
- Updated number of all known cases of duplicate issuance since Go Live and the value of the duplicate benefits.
- Baseline data from pre-conversion (see page three of the Advance Notification letter).