



**United States
Department of
Agriculture**

Food and
Nutrition
Service

Northeast Region

10 Causeway St.
Room 501
Boston, MA 02222

OCT 18 2018

Courtney Hawkins, Director
RI Department of Human Services
Louis Pasteur Building
57 Howard Avenue
Cranston, RI 02920

Dear Director Hawkins:

Thank you for your August 31, 2018 letter addressing the benchmarks that were included in the Food and Nutrition Service's (FNS) Formal Warning Corrective Action Plan (CAP) response dated July 20, 2018. FNS has reviewed the updates and has the following comments and requests.

Timeliness

If the Rhode Island Department of Human Services (DHS) chooses to provide its own data to demonstrate that it has met the 95% application processing timeliness (APT) standard, the State must provide written detail of the methodology used in its calculation. The methodology must comply with the FNS APT Protocol that was previously shared with the State. Once FNS provides approval of the methodology used, the State will be required to update the weekly reports submitted to FNS for review and comment. DHS will also need to provide historical data to cover the July – December 2018 timeframe required by the July 20th Formal Warning CAP response.

Backlog Elimination

DHS will be required to provide confirmation that it has met the benchmarks for eliminating the backlog of overdue, unprocessed documents. The State may use the existing FNS weekly reports to convey that the benchmarks have been met.

Delayed Implementation of Interfaces

FNS acknowledges receipt of the State's September 17, 2018 submission of the proposed plan to address over-issuances associated with the delayed implementation of interfaces. DHS and FNS have had several calls to discuss the details of the plan, and FNS will continue to provide technical assistance as needed. A written response to the State's September 17th letter will be submitted under separate cover.

Able-Bodied Adults Without Dependents (ABAWD)

FNS will continue to monitor the open ABAWD findings and system functionality through the Corrective Action Process. Once all corrective actions for specific findings are accepted, FNS will transition the findings to the Semi-annual CAP for monitoring and validation.

Electronic Benefit Transfer (EBT) Reconciliation

Within 20 days of receipt of this letter, FNS requests that DHS submit a detailed document outlining the EBT reconciliation procedures. The document must identify the data and reports used for EBT reconciliation in order to ensure that the State certification system and the EBT system are synchronized.

Under separate cover, FNS will continue to work with DHS in order to provide optimal fiscal oversight of the EBT operations and for complying with the EBT reconciliation requirements.

Quality Control (QC)

FNS requests that DHS provide monthly written updates on the status of Federal Fiscal Year (FFY) 2018 QC case completion and backlog until all FFY 2018 cases are transmitted by January 23, 2019. Due to the time it takes to recruit and train QC Reviewers, we are requesting that DHS expedite the hiring and training process so the additional new staff can have an impact on addressing the FFY 2018 backlog.

Reporting

DHS' delayed submission of Federally-required reports has had a significant adverse effect on FNS' ability to finalize and issue State Activity Reports and data. FNS is requesting additional information to assist us in determining what technical assistance is needed and what temporary measures can be considered to help DHS report both historical and current data to FNS. Within 20 days of receipt of this letter, please address the following questions:

- Which of the following reports are available for immediate submission to FNS and for what reporting period (month/quarter): FNS-46, FNS-101, FNS-209, FNS-366B, FNS-388, FNS-583, FNS-834;
- For the above mentioned reports, what level of certainty does the State have with regard to the accuracy of each report?
- Which of the above reports have outstanding defects? What are the planned date(s) for upcoming releases to address those defects? Please provide a detailed list of those defects, the impact they may have on specific data, and the upcoming release in which they will be fixed.
- For historical reporting periods, which of the above reports present challenges in obtaining historical information? Please define the historical period for each report where data may be questionable or difficult to obtain.

Due to this matter being very time sensitive, FNS will continue to work directly with the appropriate staff in order to assist the State in meeting reporting requirements, and may provide additional guidance under separate cover. However, to fully understand the challenges, we are requesting a written response to the above questions within 20 days of receipt of this letter.

Claims Collection and Recovery Unit (CCRU)

FNS appreciates the State's submission of the Claims Action Plan on August 31, 2018 and accepts the State's Plan. The State should continue to provide a monthly update

on the Claims Action Plan in advance of the on-site CCRU meetings between DHS and FNS. The Plan will continue to change and evolve as deficiencies are resolved and any new ones discovered. FNS acknowledges DHS' heightened focus on the deficiencies surrounding claims and the State's recent progress in addressing them. FNS will continue to provide technical assistance as needed. We are hopeful that the data and code fixes scheduled to address some of the defects in this area will be accomplished as scheduled.

Please provide FNS with the requested information by the dates indicated above. FNS appreciates DHS' ongoing efforts to address the issues identified in the April 16, 2018 Formal Warning letter. Our agency remains committed to providing technical assistance as needed. If you have any questions, please contact Maria Volpe at 617-565-6390.

Sincerely

A handwritten signature in cursive script that reads "Michelle Dean for". The signature is written in dark ink and is positioned above the typed name of the signatory.

Bonnie Brathwaite, Director
Supplemental Nutrition Assistance Program
Northeast Region