



# Oregon

Tina Kotek, Governor

## Department of Human Services

Office of the Director  
500 Summer St. NE, E-15  
Salem, OR 97301  
Voice: 503-945-5600  
Fax: 503-581-6198



September 26, 2024

Kip Memmott, Director  
Secretary of State, Audits Division  
255 Capitol St. NE, Suite 180  
Salem, OR 97310

Dear Mr. Memmott,

This letter provides a written response to the Audits Division's final draft audit report titled "The Oregon Eligibility System Appropriately Determines Eligibility, but Input Errors Continue to Occur."

First of all, I would like to commend your audit team for their thorough work, extensive attention to detail, and professional demeanor throughout this audit assignment. Our ONE eligibility determination system is a very complex system supporting nine distinct programs and over 1.5 million Oregonians in need of help and support (the highest caseload in Oregon's history).

Further, the time period over which this audit occurred added additional audit challenges as the COVID-19 pandemic response and the critical and often time-sensitive adjustments needed to the ONE system, the relative newness of the system and our eligibility specialists lack of experience with the system, the ONE system implementation of multiple new programs and key federal and legislative policy changes, as well as the changes needed to return to normal operations once the pandemic ended, made their audit work more fluid and complex. They did amazing work under less-than-ideal circumstances.

That said, ODHS generally agrees with the findings and recommendations contained in this report. Below is our detailed response to each recommendation in the audit.

**RECOMMENDATION 1**

Evaluate opportunities to improve input accuracy through automation and propose changes to the ONE system to enforce them. Examples of possible controls could include:

- a. Requiring entry into income fields that are necessary for eligibility or benefit determination decisions; and
- b. Requiring eligibility to be rerun and authorized when new or modified information that may affect eligibility or benefit amounts are entered

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Partially Agree	12/2025	Christy Jo Williams, 503-507-5434

**Narrative for Recommendation 1**

Based on current functionality of ONE, we do have controls in place for income and authorizing benefits when new or modified information is entered. Currently, the ONE system does require data entry into income data fields for eligibility determination. In addition, ONE requires authorization of eligibility when information is updated/changed. If an eligibility worker does not authorize in this scenario, an abandoned task is created which is then worked. In addition to considering system changes, OEP is currently conducting regional sessions with eligibility staff across Oregon to highlight income related eligibility data entry and questions to ask an Oregonian applying/renewing in ONE. Lastly, we implemented Periodic Report Automation in August 2024 to streamline no change reported by Oregonian.

We do want to explore additional automation to improve income data input. System changes that will be evaluated in 2024-2025 for possible implementation:

- Self-Employment pilot with USDS for a self-employment reporting and verification tool is occurring now. Will continue to evaluate use of this tool for ongoing use.
- Quality Review Check screen to assist Eligibility staff in ensuring all necessary information has been entered into the system and prompt an eligibility worker if there is missing/discrepant data entry.
- Income simplification automation to simplify data entry of income.

**RECOMMENDATION 2**

Refine override processes to ensure overrides are restricted to authorized personnel, consistently documented, and monitored, including:

- a. Limiting those who can finalize eligibility and benefit determination overrides by either restricting rights to perform overrides in the system to leads and managers or requiring leads or managers to approve overrides before they are finalized;
- b. Implementing automated functionality that requires a note in ONE when overrides are performed;
- c. Creating and implementing a formal, documented process that defines how often overrides should be reviewed, and by whom; and
- d. Developing procedures to correct override errors detected during reviews.

<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	03/31/2025	Christy Jo Williams, 503-507-5434

**Narrative for Recommendation 2**

Currently, the ONE system does require a case note for an override. In addition, there is an Eligibility Guide for Overrides that clearly identifies when an override is appropriate/valid. If override for another reason, the override must be approved by Central Office Policy or OEP. The system also generates a task for leadership every time eligibility runs on a case in ONE with an active override.

Override case notes are a topic being discussed with eligibility staff during OEP regionals this year. Regionals are across the state of Oregon for all eligibility and leadership.

Actions moving forward to address overrides:

- A change request to the ONE system to limit override actions in ONE to leads and/or managers. The CR has not been scheduled at this time pending governance prioritization of CRs.
- OEP-LET will update the Take Time for Training video and OEP-SEDD will communicate to staff on correct override reasons and clear case notes on override reason. Take Time for Training expected in last quarter of 2024.
- Create and implement a formal, documented process that defines how often overrides should be reviewed, by whom; and a tool for reviewing of the override task. Including how to correct override errors found during the review.

**RECOMMENDATION 3**

Develop a test plan for user acceptance testing to formalize priorities and required scenarios for different types of changes. The plan should address ODHS’s decisions in a formal document that includes risk assessment and evaluation of coverage and resources.

<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	9/30/2025	Chet Lundy Director, Business Information Services, OEP (503) 884-5958

**Narrative for Recommendation 3**

We appreciate the recommendation to develop a formal test plan for user acceptance testing (UAT) to better ensure stable and consistent quality control methods related to various changes within our IT system. We fully agree that a comprehensive, documented approach will enhance our current practices.

In response to this recommendation, we will initiate the development of an overarching UAT test plan that will:

1. **Consolidate Existing Practices:** We will integrate our current testing artifacts and practices into a cohesive framework, ensuring that we leverage existing knowledge, standards, and resources effectively.

2. **Define Test Types, Priorities and Scenarios:** The test plan will outline specific test types, priorities and scenarios tailored to the different types of changes anticipated in our system. This will help us systematically address each change and its impact.
3. **Include Risk Assessment:** Standard ONE program risk management tools and practice will be leveraged as part of the test plan. This will allow us to identify potential risks associated with each change and to formulate appropriate test strategies as mitigations.
4. **Evaluate Coverage and Resources:** We will assess the adequacy of our testing coverage and the resources required to effectively implement test cycles. This will ensure we are effectively informed and empowered to make result-based promotion decisions for system changes.
5. **Documentation of Decisions:** The plan will formalize ODHS's decisions regarding UAT processes and outcomes, ensuring transparency and accountability in our testing procedures.

We anticipate that establishment of this test plan will promote reliable process standards in our UAT processes and also contribute to overall stability and reliability of our IT systems. We are committed to completing this plan by September 30, 2025.

Thank you for your recommendation; we look forward to implementing these improvements.

Please contact Nathan Singer, Director, Oregon Eligibility Partnership at 503-269-8913 with any questions.

Sincerely,



Fariborz Pakseresht, Director  
Oregon Department of Human Services