



Food and
Nutrition
Service

Park Office
Center

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May 23, 2018

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

Dear Ms. Hawkins:

Thank you for your agency's September 22, 2017, response to the Civil Rights (CR) Compliance Review for the Rhode Island Supplemental Nutrition Assistance Program (SNAP). The onsite portion of the review was conducted February 3-4, 2014, and our report was submitted to your agency on May 22, 2014. The Food and Nutrition Service (FNS) is pleased to see that several corrective actions have been implemented or are being assessed in response to the findings contained in the report. We have been in contact with your agency regarding the report and your initial actions and responses. However, the following findings are still outstanding and require corrective action and validation:

Section 2:

Finding #2: Numerous forms, applications, and notices contain no Nondiscrimination Statement (NDS), an outdated NDS, or an improperly edited NDS.

Required Corrective Action: The revised program application (DHS-2) provided with your recent response contains the current, but reformatted, NDS. However, a review of additional outreach material on <http://www.eatbettertoday.com/partners/materials-and-forms/> showed that this information does not contain the correct version of the USDA for SNAP. Our Regional Civil Rights director is working with your representatives to address this matter. Please provide an update on any corrective actions in your next CAP.

Section 3:

Finding #1: Rhode Island SNAP application forms do not utilize the proper two-question format for race and ethnic data collection.

Required Corrective Action: Please provide an update to the coordination efforts with the Executive Office of Health and Human Services as referenced in your recent CAP. If finalized, please provide a copy of any policy or procedural documents.

Finding #3: The State agency does not have an effective policy or procedure in place that directs collection of the racial and ethnic data by SNAP eligibility workers based on visual observation when the information is not voluntarily provided by the applicant.

Required Corrective Action: Your recent CAP indicated that your agency is developing a procedure to address the finding, which will be submitted for review within 60 days. Please provide an update or the final procedural guidance.

Section 4:

Finding #2: The State agency lacks a policy and procedures to ensure reports of CR complaints associated with SNAP are submitted to FNS prior to issuance of a decision letter to the complainant in accordance with FNS Instruction 113-1, Section XVI, C(8).

Required Corrective Action: Your recent CAP response did not address the specific issue of the finding. Contact was made with your SNAP Civil Rights representative on October 30, 2017, and technical assistance was provided to better address the outstanding issue. Please provide any additional policy or updates regarding this matter.

Section 5:

Finding #1: The State agency is not conducting Civil Rights compliance reviews in accordance with the requirements of FNS Instruction 113-1, Section XIII and Appendix A.

Required Corrective Action: Your recent CAP indicated that you will provide three (3) completed reports to address this finding. Please provide these reports and any follow-up actions taken as a result.

Finding #2: There is no evidence that preaward compliance reviews are/have been conducted prior to entering into subrecipient agreements.

Required Corrective Action: Please provide a list of contracts and agreements implemented since January 2015. Please provide two (2) of these contracts for review to ensure appropriate action has been implemented.

Section 6:

Finding #1: The State agency does not have a policy or procedures in place to formally address findings of CR noncompliance within SNAP.

Required Corrective Action: Your agency CAP addressed only complaint noncompliance. The Regional Civil Rights director has contacted your SNAP Civil Rights representative to provide additional technical assistance and information regarding this matter to address the

remaining requirements. Please provide an update or finalized policy document with your next CAP.

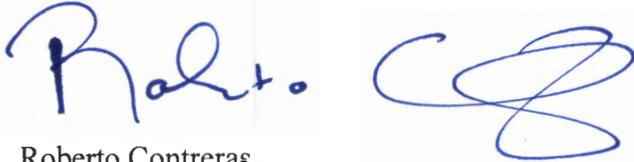
Section 9:

Finding #1: The State agency has not conducted a comprehensive language assessment of the potentially eligible population(s) at the project area (district office) level.

Required Corrective Action: Your recent CAP indicated ongoing efforts to address this finding. In your next CAP update, please include any results and analysis and a copy of any process or policy document that may have resulted from your actions in response to this finding. If not completed by your next update, please provide an estimated completion date.

Please provide an update with the requested validating documents within 30 days of the date of this letter. Thank you in advance for your prompt resolution of issues noted above. If you have any questions, please contact Mr. Stephen Miliano at (617) 565-6424 or email at Stephen.Miliano@fns.usda.gov.

Sincerely,



Roberto Contreras
Director, Civil Rights Division
Food and Nutrition Service
U.S. Department of Agriculture

cc: Crystal Tolar, Chief, Compliance Branch, Civil Rights Division
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