



Rhode Island Department of Human Services

57 Howard Avenue
Louis Pasteur Building
Cranston, RI 02920

June 22, 2018

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

Dear Director Contreras,

Please see below our follow up response to the letter dated May 23, 2018 regarding the Compliance Review which was completed at the Rhode Island Department of Human Services on May 22, 2014. Below is an update on the outstanding items we have been working on.

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Finding #2: Numerous forms, applications, and notices contain no Nondiscrimination Statement (NDS), an outdated NDS, or an improperly edited NDS.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 representative to address this matter. Please provide an update on any corrective actions in your next CAP.

RI DHS Response: We have reached out to our partners at URI and they have updated their website accordingly: <http://www.eatbettertoday.com/>. FNS is working directly with URI to address the use of NDS on their outreach materials.

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 a copy of your current application and online application screen shots.

RI DHS Response: The online customer portal application for SNAP benefits now complies to the two-question format for race and ethnic data collection. The worker portal also complies to this two-question format. Please find screen shots indicating this attached (Section 3, Finding 1, Attachment A). In the summer of 2017 we had anticipated a new DHS-2 would be in circulation by the fall. However, that application was not approved by our partners at EOHHS and has resulted in a renewed DHS-2 project. Key staff from RI DHS and EOHHS are working on this project this summer with a Fall 2018, circulation goal.

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: FNS CRD has confirmed participation in the referenced training. However, in order to validate continued compliance since your initial CAP, please provide documentation to confirm training has occurred in the most recent Fiscal Year.

RI DHS Response: Attached please find a record of our civil rights trainings conducted between January 1, 2017 and May 1, 2018 (Section 3, Finding 3, Attachment A). These numbers are collected from employee sign-in sheets used at each training session. Also attached are records of the employee sign-in sheets from 2017 and 2018 (Section 3, Finding 3, Attachments B and C).

Section 4:

Finding #2: The State agency lacks a policy and procedures to ensure report 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 XIII and Appendix A.

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.

RI DHS Response: Attached please find an updated SNAP Discrimination Complaint Procedure removing the word 'age' from the fourth bullet point to ensure all discrimination complaints are referred to FNS (Section 4, Finding 2, Attachment A).

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.

RI DHS Response: Attached please find three reports from 2016 that indicate how we are tracking compliance at our various offices (Section 5, Finding 1, Attachment A). We have monthly reports for January 2016, June 2016, and December 2016. Going forward, we plan to record the calendar date (i.e. 06/22/2018) of the compliance review when conducted.

Finding # 2: There is no evidence that pre-award 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.

RI DHS Response: Please find two agreements and a list of our contracts and agreements since January 2015 attached (Section 5, Finding 2, Attachments A, B, and C).

Section 6:

Finding #1: The State agency does not have a policy or procedures in place to formally address findings of CR non-compliance 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.

RI DHS Response: Attached please find our Non-Complaint Non-Compliance Procedure (Section 6, Finding 1, Attachment A).

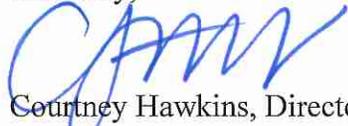
Section 9:

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: Please provide an update on this process. Include any results and analysis and a copy of any process or policy document that may have resulted from your actions in responding to this finding in your next CAP update.

RI DHS Response: We are in the process of fixing the system issues in RIBridges which have prevented us from running the proper report to obtain this information. Specifically, current system errors prevent us from obtaining the correct address information. We aim to have this resolved by December 2018. Once the system issue is resolved, we will run the reports and provide you with copies.

Sincerely,



Courtney Hawkins, Director
RI Department of Human Services