



Food and  
Nutrition  
Service

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Center

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Alexandria  
VA 22302

August 25, 2017

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 October 17, 2014, 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 were planned or implemented 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 1:**

**Finding # 1: The State agency failed to comply with requests to provide copies of existing agreements between the SNAP State agency and its subrecipients for review.**

**Required Corrective Action:** Please provide copies of the agreements referenced in your original Corrective Action Plan (CAP).

**Section 2:**

**Finding #1: The State agency does not have adequate processes in place to ensure applicants are properly advised of, and understand, their rights and responsibilities.**

**Required Corrective Action:** Please provide a copy of the procedural memo referenced in your CAP.

**Finding #2: Numerous forms, applications, and notices contain no Nondiscrimination Statement (NDS), an outdated NDS, or an improperly edited NDS.**

**Required Corrective Action:** Please provide a copy of the most recent application and other materials developed since October 2014, which are currently in use by the State agency and its subrecipients.

**Finding #3:** State agency web pages contain either no NDS or an outdated NDS

**Required Corrective Action:** The State agency must update the Program web page with the appropriate USDA Nondiscrimination Statement for SNAP. Please provide a link to the page or "screen capture" of the page and corrected information.

### 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.

**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.

### Section 4:

**Finding #1:** The State Agency does not maintain a log containing Civil Rights complaints as required by 7 CFR §271.6, 7 CFR §272.6, and FNS Instruction 113-1.

**Required Corrective Action:** Please provide a copy of the current Civil Rights Complaint Log, ensuring any personal data is redacted prior to submitting to FNS CRD.

**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:** Please clarify exactly what action has taken place regarding this finding. Please provide copies for review and validation.

**Finding #3:** The State agency's "discrimination complaint procedure" document fails to adequately address or advise personnel of the USDA CR complaint process.

**Required Corrective Action:** Please clarify exact actions that have been taken, providing copies of any policy and training materials for review and validation.

**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:** Please provide a list of MEs completed in Fiscal Year 2016. Please include a sample of the tool used for these reviews along with three (3) completed 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:** Please provided a final copy of the of the State's policies and procedures for review and validation of actions to resolve this finding.

**Section 8:**

**Finding #1:** The State agency lacks adequate policy regarding where responsibility lies for addressing disability issues as they apply to SNAP.

**Required Corrective Action:** Please provide copy of final policy(ies) for FNS review with your next CAP. This should be formalized to ensure continued support to the SNAP.

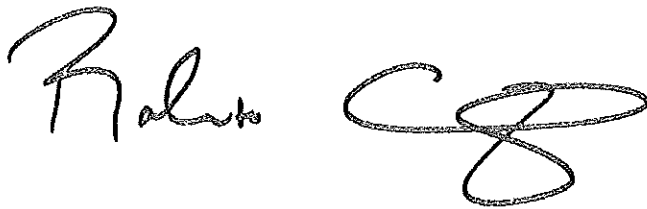
**Section 9:**

**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.

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](mailto:Stephen.Miliano@fns.usda.gov).

Sincerely,

Handwritten signature of Roberto Contreras, consisting of a stylized 'R' followed by 'alberto' and a large, loopy 'CG' monogram.

Roberto Contreras  
Director  
Civil Rights Division

cc: Crystal Tolar, Chief, Compliance Branch, Civil Rights Division  
Kurt Messner, Regional Administrator, NERO  
Bonnie Brathwaite, SNAP Director, NERO  
Iwona Ramian, SNAP Administrator, RI Dept. of Human Services  
Kimberly Nikolaidis, Assistant Administrator, SNAP  
William O'Donnell, SNAP Corrective Action Officer, RI Dept. of Human Services  
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