



Rhode Island Department of Human Services

57 Howard Avenue
Louis Pasteur Building
Cranston, RI 02920

September 22, 2017

Roberto Contreras, Director
Unites States Department of Agriculture
Food and Nutrition Service Agency
3101 Park enter Drive
Alexandria, VA. 22302

Dear Director Contreras:

I am responding to your letter dated August 25th, 2017 regarding the Compliance Review which was completed at the Rhode Island Department of Human Services on May 22, 2014. Please see below the corrective actions we are taking to resolve the outstanding findings of the review:

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 sub recipients for review.

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

RI DHS Response: Please see the attached template of our contracts that are used for SNAP sub recipients. Please also reference paragraph 13 of our existing contracts to address this finding.

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.

RI DHS Response: Please see the attached memo and training power point used to conduct

training.

Finding #2: Numerous forms, applications, and notices contain no Nondiscrimination Statement (NDS), an outdated NDS, or an improperly edited NDS.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

RI DHS Response: Please see the attached DHS 2 Application form. Please also see the attached NDS.

Finding #3: State agency web pages contain either no NDS or an outdated NDS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

RI DHS Response: SNAP Program page on the RI DHS web site has been updated with a link to the FNS NDS on the USDA web site: <http://www.dhs.ri.gov/Programs/index.php>. Please also see the attached web page printout.

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: Please see the attached DHS-2 Application Form. Per previous discussion with Steve Miliano from NERO, we are coordinating with the Executive Office of Health and Human Services (EOHHS) to determine the requirements from CMS for an integrated application to meet this finding. We will provide an update within the next 60 days.

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: Our policy office is developing a procedure to address this finding. We will submit a copy within the next 60 days.

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.

RI DHS Response: Please see the attached tracker log to address this finding.

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.

RI DHS Response: Please see the attached procedure to address this finding.

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.

RI DHS Response: Please see the attached revised discrimination complaint procedure.

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.

RI DHS Response: Please see the attached sample tool. We will provide 3 completed reports within the next 60 days to address this finding.

Finding #2: There is no evidence that pre-award compliance reviews are/have been conducted prior to entering into sub recipient 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 see the attached copies.

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.

RI DHS Response: Please see the attached SNAP Discrimination Complaint Procedure.

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.

RI DHS Response: DHS Office of Rehabilitative Services is responsible for addressing disabilities issues as they relate to SNAP. Please see the attached memo from Ronald Racine, Associate Director, DHS/ORS.

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 currently using the census data through the US Census' "Fact Finder" software to identify the client populations and income levels and compare it to current participants. We are working with Deloitte to obtain the data for the FNS 101 which will identify the current population of other than English speaking clients and their demographics. Once complete, the final analysis will be forwarded to FNS for review.

I look forward to working with you.

Sincerely,



Courtney Hawkins, Director
RI Department of Human Services