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**COMMENTS ON PROPOSED STANDARDS OF THE BATTERER'S INTERVENTION
PROGRAM STANDARDS OVERSIGHT COMMITTEE
November 2018**

The ACLU of Rhode Island wishes to offer one comment on these proposed amendments to the Oversight Committee's amendments to its current Comprehensive Standards.

Section 2.4.9, dealing with non-discrimination, retains a requirement for programs to maintain written policies and implement practices that prohibit discrimination. However, the proposal deletes language that specifies the types of discrimination that are prohibited, such as race, sexual orientation, and marital status, and further deletes language making clear that the prohibition applies to all relevant parties – victims, batterers and staff.

We believe an important purpose is served by providing specific guidance in the regulations to intervention programs as to the types of discrimination that are prohibited, as opposed to letting every program decide for itself whether it can or will discriminate on, say, the basis of political affiliation.

If the drafters' concern is about the list's exclusiveness, we respectfully suggest that the solution is not to delete the list, but instead to clarify that the list of prohibitions is not meant to be exclusive.

If the suggestions we have made are not adopted, we request that, pursuant to R.I.G.L. §42-35-2.6, you provide us with a statement of the reasons for not accepting these arguments. Thank you for considering our views.

Submitted by: Steven Brown, Executive Director