

# **Appendix F. Local SNAP Office Director Interview Protocol**

OMB No. 0584-[NEW]

*Assessment of Mandatory E&T Programs*

Month XX, 2018

**Project Officer: Jordan Younes**

Office of Policy Support  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22303  
703-305-2935  
Jordan.younes@fns.usda.gov

# Assessment of Mandatory E&T Programs: Local SNAP Office Director Interview Protocol

---

My name is [name], and I'm a researcher at [Insight Policy Research/Mathematica Policy Research, working with Insight]. As you may know, Insight is conducting the Assessment of Mandatory E&T Programs study for the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture. This study examines how mandatory State SNAP E&T programs are administered and how the programs help SNAP clients move toward economic self-sufficiency. We are interested in better understanding the rates of participation, sanction, and employment among mandatory clients. We also want to explore reasons why mandatory E&T clients are most often sanctioned and when sanctions happen, such as at initial referral, intake and assessment, or service referral. This study also seeks to understand what data are available on how well mandatory programs help SNAP clients gain skills, certificates and credentials, and stable employment.

My colleagues and I are currently visiting local SNAP offices and E&T providers here and in five other States to collect information from a wide range of stakeholders involved in operating a mandatory SNAP E&T program. I want to start by thanking you for taking time to speak with us today. Your perspective and insights on these issues will be very helpful to the study.

I want to let you know that your participation in this interview is voluntary, and your responses will be kept private, except as otherwise required by law. We will not share the information you provide with anyone outside the study team, including your supervisor and State-level staff. You may refuse to answer any question, and you may stop the interview at any time. There will be no penalties if you refuse to participate in part or at all.

We will take notes over the course of the interview and would like to record the conversation so we can remember the information we collect. We will use this information in our reports to FNS, describing the range of responses expressed by staff. The reports might list the States that contributed information, but we will not quote you or anyone by name or title. However, because of the relatively small number of SNAP offices participating in the study, there is a possibility a response could be correctly attributed to you.

I expect our conversation will take about 60 minutes. First, do you have any questions for me about the project in general or what we will be discussing today?

Do I have your permission to record our conversation? *[Confirm permission before recording starts.]*

*According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-xxxx. The time required to complete this information collection is estimated to average 60 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-xxxx\*). Do not return the completed form to this address.*

## A. Background

---

I'd like to start with a few questions about your role and responsibilities.

1. What is your current job title or position?
2. How long have you been in this position?
3. What are your primary responsibilities?

## B. Target Population and Local Area

---

Let's talk about your SNAP E&T clients.

1. Who is targeted for mandatory SNAP E&T in this area?
  - a. I understand some SNAP clients in your county are exempt from mandatory E&T, such as *[identify exempt groups listed in State plan]*. Is that accurate? Are there other exempt groups I did not mention?
  - b. What are the reasons these groups are exempt?
  - c. Are there any local areas in this region that are not subject to mandatory SNAP E&T? If so, what are reasons for those exemptions?
2. E&T policies and practices can change from time to time. I understand your State *[identify any changes reported during State Director interview]*. What effect, if any, do you think those changes have had on E&T participation? Sanction rates? Outcomes?
  - a. *[If no changes are reported by State Director, ask]:* How have your State's E&T program or practices changed within the past year? What effect did these changes have on E&T participation? Sanction rates? Outcomes?

## C. Training

---

Next we are interested in knowing more about how you train your eligibility workers on mandatory E&T policies and procedures.

1. What kinds of training do SNAP eligibility workers (or the individuals who screen for exemptions) receive on implementing mandatory E&T policies?
  - a. Who participates in the training?
  - b. Is the training in person, online?
  - c. How often does the training occur?
  - d. What does the training cover (e.g., screening for exemptions? monitoring for compliance? issuing sanctions?)
2. How do workers stay up to date on current policies regarding E&T requirements, standards for compliance, and exemptions?

## D. Intake in E&T Programs

---

Let's discuss the procedures for screening, referral, and notification of mandatory clients in E&T services.

1. As you know, clients must be screened for Federal, State, and any local exemptions. What is the process for determining whether a SNAP client is exempt from the mandatory E&T requirements?
  - a. Do eligibility workers review a list of exemptions with the client, or do they rely on the client to report any barriers they may have?
  - b. Does screening occur face to face, or by telephone, or using some other mode of communication?
  - c. What sorts of guidance or aids do workers use during the screening process, if any? *[Request copies.]*
2. Does the eligibility worker typically make a determination at the time of screening, or is there a delay between the time when the worker gathers relevant information about the client's circumstances and the actual determination?
  - a. *[If the worker makes the determination at the time of screening:]* What additional information do they provide to the client at that time, aside from letting them know they must participate in E&T services? Does the worker direct the client to a particular office, give a phone number to call, or a list of E&T providers? Do mandatory participants receive any hard copy or electronic instructions?
  - b. *[If there is a delay between screening and determination:]* How are clients notified about their E&T status? For example, do they get a notice in the mail, a phone call, an email? What additional information do mandatory participants receive upon learning that they are required to participate in E&T services? For example, are they instructed to schedule an orientation or contact an E&T provider? Do they receive hard copy or electronic instructions?

*[Request copies of any notification documents.]*

3. In your opinion, how complicated or straightforward is the process for determining whether a SNAP client is exempt from mandatory E&T?
  - a. Are some exemptions more difficult to screen for than others?
  - b. Can you think of any factors that may contribute to determination errors?
  - c. Do you think telephone interviews or task-based systems (i.e., shared case management) affect an eligibility worker's ability to identify an exemption?
4. How often does a participant who qualifies for an exemption get referred to E&T?
5. How are incorrect referrals identified? Describe.

- a. When a worker makes an incorrect referral, at what point does the worker typically learn he or she made an error?
  - b. How do these errors get corrected?
6. Are there any other steps in the intake process that your office is responsible for after making the referral? Please describe.

## E. E&T Components and Support Services

---

We'd also like to better understand your relationship with E&T providers and the components and support services that are available to your clients. *[Note: Interviewer will know what whether and which providers the office works with based on initial discussions with the State to coordinate the site visit.]*

1. If State has E&T Providers: To begin, I want to make sure I am aware of all the E&T providers that work with SNAP mandatory E&T participants. Can you review that with me? Can you tell me about the services each provider offers?
  - a. How did each of these providers connect with SNAP—in other words, what prompted your office to begin referring mandatory E&T participants to these partners?
2. How do the SNAP office and E&T providers communicate to coordinate services? How well does this approach work?
3. Can mandatory E&T participants choose among various E&T services, or do they get placed or assigned to a particular service?
  - a. *[If they can choose among various services:]* Have you found that some services are more “in demand” or more heavily used than others? Are there some services that mandatory participants never or rarely choose? What do you think accounts for such differences?
4. What supports, if any, does your office provide to mandatory E&T clients?
  - a. What supports do they most commonly need?
  - b. How do clients learn about the supportive services that are available? Do they have to ask for them, or does the worker describe them to the client? When are participants informed about these supports?
  - c. What do your workers tell clients about participant reimbursements? Do you think all workers let participants know that they are exempt from E&T if costs exceed supports?
5. To what extent do you think the supports offered by your office and the providers cover the costs associated with participating in the program?
  - a. How does your office determine whether a participant should be exempt from participating in E&T because of the cost?

## F. Local Capacity

---

1. Does your office currently have sufficient resources and capacity to serve mandatory E&T clients, including required participant reimbursements?
  - a. *[If insufficient resources, ask:]* What resources are you lacking? How does this affect the services you provide?
  - b. What would happen if participation reached 100 percent?
    - i. What additional resources would your office need?
2. Do you think the local E&T providers have the collective capacity to serve the entire mandatory SNAP E&T population?
  - a. *[If providers are used, ask:]* Are some providers limited in the number of clients they can serve?  
  
*[If participants can choose components, ask:]* Have you seen demand for a particular component exceed the providers' capacity?

## G. Compliance and Sanctions

---

Next I'd like to talk about potential "dropoff" points in the process, where a mandatory participant is at risk of being found noncompliant with the E&T requirements.

1. What are the participation requirements for clients in order to remain compliant? *[Probe for:]* How many days or hours are they required to participate? What steps are they required to take?
2. How do you track how clients are meeting their E&T requirements?
3. How do E&T providers track whether clients are meeting their E&T requirements?
  - a. Do they track who is referred versus who shows up? How?
  - b. Do they track ongoing participation? How?
  - c. How well do you think providers are tracking clients? Please explain.
  - d. Do providers have difficulty tracking certain acts of noncompliance? Is participation more difficult to track for certain components?
4. What information do providers report to your office? How? *[Probe for:]* What component the client is enrolled in? If they complete the program? Receive a credential or certificate? Enroll in another component? Get a job?
5. How do providers report noncompliance to your office?
  - a. What other information do they report?
  - b. How frequently do they provide data?
6. Have you ever had difficulties with any providers? Describe.

- a. How did you address the difficulties?
7. *[If State offers conciliation process, ask:]* Can you describe your conciliation process for noncompliant clients? *[Probe for:]* When does conciliation happen—before the Notice of Adverse Action (NOAA) goes out? As part of the NOAA?
  - a. How long is the conciliation period?
  - b. How does your office determine whether a client comes into compliance? What information do you use?
8. How and when do SNAP workers determine “good cause” for noncompliant clients?
  - a. Do they make the determination themselves or rely on the client to demonstrate good cause?
  - b. Do workers ever use information from providers when determining good cause? From employers? Please describe.
9. Let’s talk about NOAAs. What sorts of questions do clients ask about NOAAs?
  - a. Are there any parts of NOAAs that clients seem to have difficulty understanding?  
*[Request copies of NOAAs if haven’t already.]*
10. As far as you know, what are some of the reasons clients don’t comply with the requirements outlined in a NOAA before being sanctioned?
11. At what step in the process do most sanctions occur in your office (e.g., between screening and E&T orientation, between orientation and participation in activities)?
  - a. Can you think of anything that could be done to reduce the likelihood of noncompliance at that point?
12. What barriers do noncompliant mandatory E&T clients most commonly report for not being able to comply upfront (i.e., before entering E&T)?
  - a. What do you think are the challenges or obstacles mandatory SNAP E&T clients face in sustaining participation?
13. Are clients more or less likely to be sanctioned depending on the component they are assigned to? If so, how would you explain this variation?
  - a. Do certain components require more time and/or effort to meet compliance requirements? Please explain.
14. Do participant reporting requirements vary between components? Please explain.
15. How does your office track and report sanctions to the State?
16. How does your office monitor whether sanctions are made correctly, if at all?
  - a. Do you ever conduct case reviews of sanctioned cases? How are these reviews conducted?

17. How frequently would you say mandatory E&T clients leave the program because they...
  - a. Are sanctioned for noncompliance?
  - b. Do not meet the deadline to recertify?
  - c. Begin earning wages above the threshold to qualify for SNAP?

## H. Monitoring Effectiveness of E&T Services

---

1. How does your office track what happens to a mandatory E&T participant once he or she is referred to E&T?
  - a. Do you or the providers monitor the employment trajectory or the types of jobs clients secure following their participation in E&T? Describe.
2. What jobs are most in demand in this area (low-, middle-, and/or high-skill jobs)? How well do you think each E&T component prepares clients for employment in the local job market?

## I. Challenges and Lessons Learned

---

Finally, I would like to learn more about any challenges you have had in operating your mandatory E&T program and any lessons learned you can share with others.

1. What is most challenging about operating a mandatory SNAP E&T program?
  - a. Can you think of ways to improve mandatory E&T?
  - b. Has the State SNAP agency been helpful in resolving any of these issues?
    - i. What else could they do to support you?
2. Is there anything you would change about the way you serve SNAP E&T clients?
3. What lessons have you learned in serving this population?
  - a. What advice would you give to other local offices beginning to serve mandatory SNAP E&T clients?

## J. Wrap-Up

---

Thank you for answering all our questions:

1. Is there anything else you would like to share with us?
2. Is there anything we did not ask about that you think is important for us to know?

That completes our questions for you. Thank you very much for speaking with us.