

# **Appendix G. Local SNAP Office Eligibility Worker Interview Protocol**

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*Assessment of Mandatory E&T Programs*

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**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 Eligibility Worker Interview Protocol

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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 a study of Mandatory E&T Programs 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 E&T 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 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 names of 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

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I'd like to start with a few questions about your roles 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. Intake for E&T Programs

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Let's talk about screening and referral procedures for mandatory E&T clients.

1. How do you screen for Federal, State, or local exemptions from mandatory SNAP E&T? Please walk me through the determination process. *[Probe for:]*
  - a. Are clients screened in person? By phone? Some combination of methods?
  - b. Do you walk through the list of possible exemptions with the client, or do you ask clients to identify any barriers that might exempt them?
  - c. Do you make an assessment about a client's qualification for an exemption, or is that done within the MIS as the client answers questions?
    - i. If in the MIS, do any of the answers to questions require your judgment (such as disability status)?
  - d. Do you use a guide or desk aid to conduct the screening interview? If so, how helpful do you find the guide? *[Collect guide if available.]*
  - e. Are there specific documents clients need to present to demonstrate they meet one or more exemption criteria?
2. 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. Have you encountered circumstances where the client's situation is complex or falls into a "gray area," and you were not sure what determination to make? If so, what do you do in those circumstances? How do you reach a decision?
  - c. Can you think of any factors that may contribute to determination errors?
  - d. How often do you think errors happen?
3. What is the process for referring nonexempt participants to E&T?
  - a. Is there a lag time between screening and notification? How long is the lag?
  - b. Do you discuss the determination with the client or mail a notification letter? *[Collect sample notification letter.]* Does that discussion or letter include information about what clients can do if they believe they meet the exemption criteria, but they were determined to fall under the mandatory requirements?

- c. What can clients do if they believe they should be exempt, but they are referred for mandatory E&T?
  - d. How frequently do clients try to appeal a determination?
4. Sometimes a participant who qualifies for an exemption may get referred to E&T. How do you learn about these incorrect referrals?
    - a. At what point do you typically learn about an incorrect referral?
    - b. What happens when you learn of an incorrect referral? Is there a way to correct it? If so, please explain.
    - c. How often does a participant who qualifies for an exemption get referred to E&T?
  5. Once clients learn they are required to participate in E&T, what happens next?
    - a. Is there some type of orientation? Where does it happen (e.g., in this office, or are clients referred to a provider for orientation)?
    - b. When does the orientation typically happen?
      - i. *[If orientation is conducted by provider, ask:]* Do participants contact the provider, or does the provider contact the participant about completing the orientation?
      - ii. *[If orientation is conducted by local office, ask:]* How is the orientation scheduled, and how quickly?
      - iii. Is orientation on a set schedule every week, or do you schedule based on flow of clients?
      - iv. What information is provided?
  6. How do you determine what E&T provider to refer a client to?
  7. What can you tell me about the enrollment process; for example, does the client need to show up at an office, school, or other site to sign up for a particular E&T service? Does the provider make any attempts to reach the client?

## C. E&T Tracking and Reporting

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Now let's talk about the relationship you have with SNAP E&T providers. *[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. How do you communicate with E&T providers about a client's status with regard to participation in E&T and compliance with requirements?
  - a. How frequently do you communicate with providers? Does frequency vary depending on the provider?
  - b. How do you know if a participant reports to a provider? Engaged in an E&T component for the requisite hours?

- c. How is noncompliance reported? What is the typical timeframe for reporting noncompliance?
- d. What are some of the challenges you have seen with respect to communicating with providers about mandatory E&T participants' compliance?
- e. Have you ever had difficulties with any providers? Describe.
  - i. How did you address the difficulties?

## **D. Conciliation and Good Cause Determination**

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We are interested in understanding the steps you need to take after a provider reports noncompliance.

1. *[If State offers conciliation process, ask:]* Can you describe the conciliation process for noncompliant clients?
  - a. How long is the conciliation period?
  - b. How do you determine whether a participant comes into compliance? What information do you use?
2. How do you make a “good cause” determination?
  - a. Do you assess good cause based on your own observations, or is it incumbent upon the client to show that he or she has good cause?
  - b. Are there specific criteria or guidelines you use for determining good cause?
  - c. Do you ever use information from providers when determining good cause? From employers? Please describe.

## **E. Compliance and Sanctions**

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We are particularly interested in gaining a better understanding of all the points where a mandatory client might receive a Notice of Adverse Action (NOAA) or be sanctioned for noncompliance.

1. Can you walk me through the process of issuing a NOAA? *[Probe for:]*
  - a. How are NOAAs issued? For example, are they sent by regular mail, by email, or are some clients notified by phone?
  - b. At what point are NOAAs issued?
2. What are clients' options if they have questions about NOAAs?
3. Do you receive many questions about NOAAs from recipients?
  - a. If so, what kinds of questions do you get? Are there any parts of NOAAs that clients seem to have difficulty understanding?
  - b. Are you typically able to answer the questions right away, or do you sometimes need to investigate further to find an answer?

- c. Is there anything you would change about NOAAs? Explain.
- 4. At what step in the process do sanctions most often occur (e.g., between screening and E&T orientation, between orientation and participation in activities, during participation in activities)? Why?
  - a. Can you think of anything that could be done to reduce the likelihood of noncompliance at that point?
- 5. Approximately how many (what percentage) of your clients who receive a NOAA comply with the requirements in time to avoid being sanctioned?
- 6. Based on your experience, what percentage of mandatory E&T clients never take the first step toward compliance, such as completing the orientation?
  - a. What are some of the reasons clients fail to take that step?
- 7. What about clients who start participating in some kind of E&T but then drop out? What are some of the reasons they report for no longer participating?
- 8. Approximately how many (what percentage) of participants return to SNAP and E&T after being sanctioned?
  - a. What is your sense of how quickly individuals return to SNAP after being sanctioned?
- 9. Does this office periodically review a portion of sanctioned cases to ensure the sanctions were issued accurately?
- 10. Do you have ideas for how to improve the sanction process? Or to improve compliance?

## **F. Monitoring Effectiveness of E&T Services**

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We're also interested in learning about the metrics you report to the State about mandatory E&T and any thoughts you have about the effectiveness of the mandatory E&T program.

- 1. Are you responsible for tracking and reporting participation data for mandatory E&T clients to the State? If so, what data do you track and report?
  - a. How do you report the data? [*Probe for: What format of the data? Database? MIS export?*]
  - b. How frequently do you report data?
- 2. In your opinion, do the services local E&T providers offer help E&T clients become more employable?
  - a. What is your sense of the providers' success rate in helping clients find employment?
  - b. Do you have access to such data?

3. What do you hear from clients with respect to the E&T services offered? To what extent do they feel they are getting valuable training or gaining skills that can help them get a job?
4. What are the most common barriers your clients face in finding employment?
  - a. What other services or supports do you think would help in addressing those barriers?
  - b. Are there other exemptions you would suggest for your clients?

## **G. Training**

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Now I have a few questions about training you receive related to mandatory E&T policies and procedures.

1. What kind of training have you received on implementing mandatory E&T policies?
  - a. How often does the training occur?
  - b. Is the training in person, online?
  - c. What does the training cover (e.g., screening for exemptions, monitoring for compliance, issuing sanctions)?
  - d. Is there any other information that would have been helpful in implementing mandatory E&T correctly?
2. How do you stay up to date on current policies regarding E&T requirements, standards for compliance, and exemptions?

## **H. Challenges and Lessons Learned**

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

1. What is most challenging about implementing a mandatory SNAP E&T program?
  - a. Can you think of ways to improve mandatory E&T?
  - b. What additional support or guidance might be helpful for eligibility workers like you?
2. What lessons have you learned in serving this population?
  - a. What advice would you give to other eligibility workers serving mandatory SNAP E&T clients?

## **I. Wrap-Up**

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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.