

Appendix E. State SNAP Director and E&T Director Interview Protocol

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Assessment of Mandatory E&T Programs

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Assessment of Mandatory E&T Programs: State SNAP Director and E&T 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 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 States 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 the 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. Introduction

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

1. What is your official job title or position?
2. What are your primary responsibilities?
3. How long have you worked at *[agency]*? How long in this position?

B. Background on State's E&T Policies

Next I'd like to get your perspective on some of the factors that helped shape *[State]*'s current policies regarding SNAP E&T.

1. I understand some SNAP clients in your State are exempt from mandatory E&T, such as *[identify exempt groups identified in the State plan]*. Are there other exempt groups I did not mention?
 - a. How did *[State]* decide on these exemption criteria?
2. As you may know, States have discretion in determining whether to make participation in E&T services mandatory or voluntary for SNAP participants. Can you describe the reasons for operating a mandatory program *[in State/selected counties or for selected groups]*?
 - a. *[If the State administers a mandatory and voluntary program:]* How did you determine where you would offer a mandatory or voluntary program? Which factors were most important in driving that decision?
3. Have there been any policy or programmatic changes within the past year that have affected your E&T program? Describe.
 - a. *[If aware of changes, probe accordingly:]* ABAWD time limit, State options, reporting requirements, sanction policies, changes to caps on participant reimbursements? Changes to allowable reimbursements? Expansion of available services? Anything else?
 - b. How did these changes affect participation, sanctions, or outcomes?
 - c. When changes are made (e.g., a specific county becomes exempt, a particular population is subject to new requirements), what typically drives those changes?
4. What kind of training does the State offer SNAP staff related to implementing mandatory E&T policies and issuing sanctions for noncompliance?
 - a. *[Probe for:]* Who receives the training? Frequency (including frequency of retraining)? Materials used? Training format (e.g., in person, online, mandatory/optional)?

C. E&T Components and Support Services

Now I'd like to talk about the services offered to mandatory E&T clients.

1. Based on your State plan, I understand that [State] offers [*insert relevant components such as job search, workfare, apprenticeship services*]. Are other services available to mandatory E&T participants, specifically, that I did not mention? Are any of the components I mentioned no longer available?
 - a. How are decisions made about what components to offer?
 - b. How do the components offered to mandatory E&T participants vary across different areas of the State (if at all), and what accounts for those differences?
 - c. How much discretion do local areas have in offering different types of components?
2. Can mandatory E&T participants choose among various services, or do they get assigned to a particular component?
 - a. [*If they can choose among various components:*] Have you found that some components are more “in demand” or more heavily used than others? Are there some components that mandatory participants never or rarely choose?
 - b. What do you think accounts for such differences?
3. To what extent do you think E&T components are well aligned with the current job market?
 - a. If markets vary by local area, do the components in a given county or geographic area align with the local markets?
4. What supports are offered to mandatory E&T clients?
 - a. What are the limits on reimbursements?
 - b. Are these limits determined at the State or local level?
5. Are there any caps on time or restricting of “slots” for certain components? Describe.
 - a. If so, who determines these restrictions? Are decisions based on funding?

D. Compliance and Sanctions

We are particularly interested in gaining a better understanding of your sanction policies and potential “dropoff” points, such as where a mandatory participant is at risk of being found noncompliant with the E&T requirements.

1. Can you provide a high-level summary of what the State requires of a mandatory client to remain in compliance with E&T?
 - a. What are the most common reasons for noncompliance?
2. Do clients tend to become noncompliant initially (by never engaging in services), or do they tend to become noncompliant after engaging in services?

3. Does the State offer a conciliation period to noncompliant mandatory E&T participants?
 - a. If not, what are the reasons for not offering conciliation?
 - b. *[if yes]* How did you decide to offer a conciliation period? How do you think the conciliation period affects sanction rates, if at all?
4. When is good cause determined?
 - a. Is it the client's responsibility to demonstrate good cause, or does the State try to determine whether the client has good cause?
5. If an E&T provider thinks a referred client has good cause—in other words, he or she believes the client should be exempt from mandatory E&T—is there a process in place that allows the provider to communicate that information back to the SNAP office? Please describe.
6. Does the State track how many clients who receive a Notice of Adverse Action (NOAA) comply with program requirements before a sanction is imposed? If so, approximately what percentage of clients comply?
7. Does your office track return rates to SNAP after a sanction is imposed? If so, what is your sense of how many individuals return to SNAP after being sanctioned, and how quickly they return?
8. Is there a process for reviewing NOAAs to make sure they are understandable to the average SNAP client?

E. Compliance Monitoring

Now I'd like to ask a few questions about the process of monitoring participation in E&T services.

1. To what extent are local SNAP offices and E&T providers monitored at the State level?
 - a. Who handles that monitoring? For example, are the programs monitored by SNAP, the Department of Labor, or a different office?
 - b. Do you monitor E&T screening and intake procedures? How long it takes to notify clients of their E&T status and refer them to a provider? How is that accomplished?
2. What kind of quality assurance procedures are in place, if any, to monitor that sanctions are made correctly?
 - a. Do you ever conduct case reviews of sanctioned cases? How are these conducted?

F. E&T Data

Now I'd like to ask some questions about the E&T data your office collects and reports to FNS.

1. What E&T-related data does the State collect?
 - a. How do you obtain data on client status, E&T activities, and outcomes?
 - b. How do you obtain the data you use to produce reports for FNS?

- c. Do you produce other reports for internal program management purposes?
 - i. What kind of information is in these reports? Do you share the internal reports with local offices?
- 2. Does the State track how many people participate in each component?
- 3. Does the State track how long nonexempt SNAP recipients usually participate in E&T?
- 4. Have E&T participation rates remained fairly consistent annually and across the State?
 - a. *[If not:]* How have participation rates changed? What do you think accounts for the change? Have there been any policy changes that may have led to a spike or drop in sanction rates?
- 5. I understand States are expected to measure E&T outcomes to determine whether the program components are helping clients become employable. Your State plan identifies *[list measures in State plan]*. Are there any other measures you collect that I did not mention? Any you no longer collect?
 - a. How did the State choose those measures?
 - b. How are measures reported? Who does the reporting? How often are data submitted?
 - c. How are these data used (e.g., are they used to inform programmatic changes or allocation of resources)?

G. 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. Do these challenges vary across different areas of the State?
 - b. Can you think of ways to improve mandatory E&T?
 - c. Can you think of any changes in policies or administrative practices that might lead to greater participation in SNAP E&T?
- 2. Is there anything you would change about the way you serve SNAP E&T participants?
- 3. Do you feel the program is meeting the goals of your agency?
- 4. What lessons have you learned in serving this population?
 - a. What advice would you give to other agencies beginning to serve mandatory SNAP E&T participants?

H. 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.