

Appendix D3

Advocacy organization interview guide

Evaluation of Child Support Cooperation Requirements in SNAP

ADVOCACY ORGANIZATION INTERVIEW GUIDE

Introduction

My name is _____ and I'm a researcher at a company called [Mathematica/MEF] Associates. Under Legal Authority Public Law, 115-334, we are conducting a congressionally mandated study of child support cooperation requirements for the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture. This study examines the implementation experience of States that currently or formerly require(d) cooperation with child support as a condition of SNAP eligibility, and the feasibility of implementing child support cooperation requirements among States considering adopting this option. I want to start by thanking you for taking time to speak with us today. Your perspective and insights will be very helpful to the study.

We are interested in understanding the motivation for implementing [considering adopting] cooperation requirements. We also want to explore how cooperation requirements [may have affected/could affect] SNAP and child support participants.

My colleagues and I are currently visiting State and local SNAP offices and child support offices here and in 11 other States to collect information about child support cooperation requirements from a wide range of stakeholders, including advocacy organizations.

This research will help the government better understand the effect of child support cooperation requirements on individuals and families. There are no known risks to your participation. I want to let you know that your participation in this study is voluntary, and your responses will be kept private, except as required by law. We will not share the information you provide with anyone outside the study team. You may refuse to answer any question, and you may stop the discussion at any time. There will 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 audio record the conversation so we can remember the information we collect. We will use this information in our report to FNS to describe States' experiences with cooperation requirements. 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 advocacy organizations participating in the study, there is a possibility a response could be attributed correctly to you.

Public Burden Statement

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 up to 90 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 to reducing this burden, to the following address: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 1320 Braddock Place, Alexandria, VA 22314, ATTN: PRA (0584-xxxx). Do not return the completed form to this address.

I expect our discussion 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? And finally, do I have your permission to record our discussion? [Confirm permission before recording starts.]

A. Respondent background

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

B. Motivation and initial implementation

1. In your opinion, what was the primary motivation for requiring cooperation with child support as a condition of SNAP eligibility? What were the primary reasons for supporting the adoption of a cooperation requirement?
2. To your knowledge, has legislation to require cooperation with child support been introduced in the past but failed to be adopted? What factors do you attribute to its [lack of] successful passage?
3. Who supported adopting the cooperation requirement? For example, the Governor, a state legislator or group of legislators, or constituency group, your organization, outside entities?
4. Before the State legislation to require child support cooperation in SNAP was enacted, was there much discussion or debate about adopting the cooperation requirement?

Probes:

- What were the major concerns about and/or arguments against adopting the requirement? Were there any people or groups, including your organization, who were opposed to the requirement?
 - What were the primary reasons for opposing the cooperation requirement?
 - To what extent did advocacy organizations provide input or were otherwise engaged? What role(s) did your organization and other advocacy organizations play?
 - To what extent did SNAP and child support staff provide input or were otherwise engaged? What role(s) did they play?
5. Once the cooperation requirement legislation was enacted, what key policy decisions still had to be made?
Probes:
 - For example, who would be subject to the requirement (i.e., custodial parents, relative caretakers/non-relative caretakers, noncustodial parents), or documentation required to establish a good cause exemption?
 - What factors led to the policy features that were ultimately adopted?
 6. Have there been any significant changes to the State's cooperation requirement policies? What changed and why? Approximately when did the change(s) go into effect?
 7. Is there much variation is there at the local level in cooperation requirement policies?

8. [FOR FORMERLY IMPLEMENTING STATES ONLY] Now, I'd like to hear more about the key factors that led to your State's decision to drop the cooperation requirement. What was the primary reason for dropping the requirement?
 - a. Who supported dropping the requirement? Who opposed dropping it? Why?
 - b. What was the role of advocacy organizations in discussions or debate about dropping the requirement? What was the role of child support agency and the SNAP agency?
9. [FOR FORMERLY IMPLEMENTING STATES ONLY] What did the process of dropping the requirement involve?
 - a. Was legislative action required?
 - b. Was the policy ended at one point in time or phased out? [IF PHASED OUT] How long did this phase out take?
 - c. How was dropping the requirement coordinated between the child support and SNAP agencies? What did this involve?
 - d. How was the change in policy communicated to participants?
10. [FOR FORMERLY IMPLEMENTING STATES ONLY] Do you think that [STATE] will reinstate the cooperation requirement for SNAP participants in the future? Why or why not?

C. Ongoing implementation of the child support cooperation requirement

1. Please describe any effect of the cooperation requirement on the SNAP/child support caseload. For example, was there a drop in SNAP applications after the cooperation policy was implemented? Was there a significant number of disqualifications after the cooperation policy was implemented? Was there an increase in child support applications after the cooperation policy was implemented? Any other notable changes or trends?
2. To what extent do the child support cooperation requirement policies and procedures in SNAP align with cooperation requirement policies and procedures in TANF? [IF APPLICABLE] Medicaid and/or subsidized child care? Where do the policies differ?

Probe:

- Who is required to cooperate, what constitutes cooperation, what is the consequence for noncooperation, good cause exemption criteria and information needed to provide a claim for good cause?
3. Thinking about all that is involved in administering the cooperation requirement, can you describe how smoothly you think the implementation process works in practice? What policies and practices facilitate and/or impede smooth implementation?
 4. What aspects of the cooperation requirement are the most confusing or challenging for participants?
 5. Can you describe the general process for imposing sanctions for noncooperation with child support?

6. What is the participant told about the consequences for noncooperation and what they have to do to avoid being sanctioned or to get a sanction lifted?
7. What are the primary reasons why participants report they were sanctioned? How easy or difficult is it to get a sanction lifted?
8. Which parts of the noncooperation determination and sanction process work well and which parts present challenges for participants? For staff responsible for administering the sanctions? What factors account for this?
9. Can you describe the general process for establishing a good cause exemption? When are participants told about good cause? What proof is needed?
10. Which parts of the good cause work well and which parts present challenges for participants? For staff responsible for administering the good cause exemptions? What factors account for this?
11. How do you think informing applicants and participants about the cooperation requirement could be improved?

D. Conclusion

1. [FOR STATES THAT ARE CONSIDERING COOPERATION REQUIREMENTS] What types of information about child support cooperation requirements would you find useful if [STATE] continues to consider implementing this requirement?
2. What do you think [are/would be] the most important benefits of having a child support cooperation requirement in SNAP? What do you think are the most significant drawbacks?
3. Is there anything else you want to tell me about your views and experiences with the cooperation requirements for SNAP participants before we finish?

Thank you for your time. Here is my contact information should you have any additional questions or concerns about the study.

[INTERVIEWER: PROVIDE RESPONDENT WRITTEN COPY OF YOUR CONTACT INFORMATION, INCLUDING NAME, TITLE, ORGANIZATION, PHONE, EMAIL ADDRESS]

Privacy Act Statement

Authority: This information is being collected under the authority of Section 9 of the Food and Nutrition Act of 2008, as amended, (7 U.S.C. 2018). Disclosure of the information is voluntary.

Purpose: The information is being collected to evaluate Child Support Cooperation Requirements in United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP).

Routine Use: The information may be shared with SNAP contract researchers and USDA SNAP research and administrative staff.

Disclosure: Disclosure of the information is voluntary. If all or any part of the information is not provided, interviews may not be admissible in data sets.

The Systems of Records Notices relevant to this collection are FNS-8 FNS Studies and Reports located at <https://www.govinfo.gov/content/pkg/FR-1991-04-25/pdf/FR-1991-04-25.pdf> and FNS-10 Persons Doing Business with the Food and Nutrition Service (FNS) located at <https://www.federalregister.gov/documents/2000/03/31/00-8005/privacy-act-proposed-new-system-of-records>.