

## **F. SNAP agency case study interview protocol**

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# SNAP Language Access Study

## SITE VISIT INTERVIEW PROTOCOL

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### Introduction

My name is \_\_\_\_\_ and I work for Mathematica. Mathematica is the research and consulting firm that is conducting the Supplemental Nutrition Assistance Program (SNAP) Language Access Study on behalf of the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA). This study examines how State and local SNAP offices serve SNAP applicants and participants with limited English proficiency (LEP). LEP individuals do not speak English as their primary language and may have a limited ability to read, speak, write, or understand English. 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 types of LEP individuals you serve in your [State/area] and the policies and processes in place to serve LEP individuals when they apply for or participate in SNAP. We also want to explore any challenges you may experience in providing services to LEP individuals and any feedback you have on information or resources that would help you better serve this population.

My colleagues and I are currently visiting State and local SNAP offices here and in three other States to collect information about serving LEP individuals from a variety of perspectives and experiences.

I want to let you know that your responses to this study 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 can stop the discussion at any time.

We will take notes over the course of the interview. We will use this information in our report to FNS to describe each State [and local area]'s experience serving LEP individuals. The report will list the names of States that contributed information, but we will not quote you or anyone by name or title. Because of the small number of States participating in the study, however, there is a possibility a response could be attributed correctly to you. [FOR SNAP AGENCY DIRECTORS/OFFICE MANAGERS: I expect our discussion to take about 60 minutes/ FOR FRONTLINE STAFF: I expect our discussion to take about 90 minutes]. First, do you have any questions for me about the project in general or what we will be discussing today?

Do you consent to participate? (Y/N)

#### Public Burden Statement

This information is being collected to assist the Food and Nutrition Service to better understand the language landscapes in which Supplemental Nutrition Assistance Program (SNAP) and Nutrition Assistance Program (NAP) agencies operate and their associated limited English proficiency (LEP) policies and operations. This is a voluntary collection and FNS will use the information to improve access of SNAP to LEP individuals. This collection does not request any personally identifiable information under the Privacy Act of 1974. 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 1.50 hours 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 Service, Office of Policy Support, 1320 Braddock Place, 5th Floor, Alexandria, VA 22306 ATTN: PRA (0584-xxxx). Do not return the completed form to this address.

## A. Respondent background

*All respondents:*

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

## B. Qualitative description of the LEP landscape

*All respondents:*

As I mentioned in my introduction, for this study we are seeking to understand how your [State/office] serves LEP individuals. To guide our conversation, it would be helpful to get a sense of the types of LEP individuals your [State/office] typically serves.

1. First, what would you say are the languages or dialects, other than English, that [are most commonly encountered in local SNAP offices in your State/you most often encounter in your office]?
2. What languages or dialects, other than English and those you just mentioned, have you encountered much less frequently?

Probes:

- *Review list of languages in the LEP American Community Survey (ACS) data for the State or local area. If languages mentioned in questions 1 or 2 differ from those listed, ask: What about [other languages in ACS data not listed]? Are they ever encountered? If so, how frequently?*

## C. Translation and interpretation services

*All respondents:*

1. Do [eligibility workers/you] provide language assistance services such as interpretation or translation?
  - a. How are [these staff/you] trained?
  - a. How are [their/your] qualifications assessed?
  - b. Who makes the decision that [they/you] are qualified to provide language assistance services?

*State office policy officials, Local office policy officials, and frontline workers:*

2. Does the State provide any translation or interpretation services? If so, what services does it provide?

*Translation is the replacement of written text from one language (the source language) into an equivalent written text in another language (the target language). Interpretation is the process by which the spoken word is used when transferring meaning between languages. Interpretation involves listening to a communication in one language (the source language) and orally converting it to another language (the target language) while retaining the same meaning.*

- c. What has been your experience working with these [interpreters or translators]?

*State office policy officials:*

- d. Who employs these staff?

- e. Are interpreters trained to provide interpretation services at a level of fluency, comprehension, impartiality, and confidentiality appropriate that is appropriate for SNAP applicants and participants? How does the State determine that interpreters are qualified to interpret for SNAP?
- f. How does the State determine that translators are qualified to provide translation services for SNAP? *A qualified translator is a highly trained individual who is able to render text from a source language into a target language while preserving meaning and adhering to generally accepted translator ethics and principles, including confidentiality.*

*State office policy officials, Local office policy officials, and frontline workers:*

- 3. Do counties or cities provide translation or interpretation services? If so, what services do they provide?
  - a. What has been your experience working with these [interpreters or translators]?

*State office policy officials:*

- b. Who employs these staff?
- c. Are interpreters trained to provide interpretation services at a level of fluency, comprehension, impartiality, and confidentiality appropriate that is appropriate for SNAP applicants and participants? How does the local agency determine that interpreters are qualified to interpret for SNAP?
- d. How does the county or city determine that translators are qualified to provide translation services for SNAP?

*State office policy officials, Local office policy officials, and frontline workers:*

- 4. Are there community-based organizations that provide translation or interpretation services? If so, what services do they provide?
  - e. What has been your experience working with these organizations?

*State office policy officials:*

- f. Are the interpreters trained to provide interpretation services at a level of fluency, comprehension, impartiality, and confidentiality appropriate that is appropriate for SNAP applicants and participants? Who determines that they are qualified to interpret for SNAP?
  - g. How does the organization determine that translators are qualified to provide translation services for SNAP?
- 5. Are there other agencies or organizations that provide interpretation or translation services? If so, what services do they provide?
  - 6. If there is no qualified interpreter available to interpret in the LEP participant's language, what would [the frontline worker/you] do?
  - 7. How common is it for LEP individuals to have their family and friends assist in communication with SNAP staff? If so, when and how might that occur?
 

Probes:

    - How common is it for LEP individuals to have children assist with translation or interpretation needs? If so, when and how might that occur?
    - How common is it for LEP individuals to have children to assist in communication between them and SNAP staff?

## D. SNAP application and participation processes

*Local office policy officials, local office managers, and frontline workers:*

Now let's talk about the process of serving individuals with LEP.

### 1. How do you determine whether someone has LEP?

Probes:

- Does this differ depending on how your office is interacting with someone (for example, in person, over the phone, or virtually)? If so, how do you determine language assistance needs for each method of communication?
2. If [your office provides frontline staff/you are provided] with a telephonic language line, how is it accessed? *A telephonic language line provides people who wish to speak to each other but do not share a common language with an interpreter by telephone.*
3. If [your office provides frontline staff/you are provided] with interpreters, how are they accessed?

*Frontline workers:*

Next I have questions about the process an LEP individual would go through when applying for SNAP. To start, let's assume that this person uses a language commonly encountered in your office, such as [commonly encountered language]. As we walk through the steps, I'll ask you some questions about how the process would differ for someone who uses a language that is less commonly encountered in your office, such as [uncommonly encountered language].

### 4. How would an LEP individual complete a SNAP application?

Probe for:

- Differences in the process for applications completed in hard copy, online, verbally with someone filling out a copy for them
  - Differences in the process for applications completed in person, by mail, by telephone
  - What would you do if you didn't have an application or interpretation services available in the LEP individual's language?
5. How would the application interview be conducted for an LEP individual?

*In some States or circumstances, verification might take place before an interview. If this is the case, ask question(s) about the verification process before discussing the application interview.*

- What would you do if there was no qualified interpreter or staff member who spoke the LEP applicant's language?

### 6. How is the verification process completed for an LEP individual?

Probe:

- What would you do if the documents or other materials used in the verification process were not available in the LEP applicant's language?
7. Once an application is approved and the LEP individual begins receiving SNAP benefits, how would an LEP individual report changes to their income or circumstances?

Probe:

- What would you do if necessary materials such as printed documents or qualified interpreters were not available in the LEP individual's language?

**8.** How would an LEP individual complete the recertification process?

Probe:

- What would you do if necessary materials such as printed documents or qualified interpreters were not available in the LEP individual's language?

*Local office managers and frontline workers:*

**9.** How [does your office/do you] track or record language assistance services provided at each step of the application and participation process?

Probe for:

- First contact upon entering the office
- Recording someone's status as LEP
- Application
- Interview
- Verification
- Change reporting
- Recertification

**10.** How [does your office/do you] determine whether LEP individuals are receiving the appropriate language assistance services during the application and participation process?

- a. How does your office determine whether LEP individuals are receiving the appropriate language assistance services during the application and participation process, when organizations or individuals outside of the local SNAP agency such as community-based organizations are providing the services?

**11.** Overall, how often [does your office/do you] receive a request for documents or interviews in languages other than English?

- a. How often [does your office/do you] respond to requests for documents or interviews in languages for which your office does not have translated materials or a qualified interpreter?

**12.** How [does your office/do you] process documents (such as applications?) received in languages other than English?

Probe:

- Does this process differ depending on the language? If so, how?

**13.** How [does your office/do you] respond to voicemail messages received in languages other than English?

Probe:

- Does this process differ depending on the language? If so, how?

**14.** Sometimes unexpected situations can occur that would affect language assistance services. For example, you could experience a software system outage, run out of translated materials, or interact with an LEP individual with whom you cannot communicate. How would language assistance be provided in these situations?

15. Have you experienced any other unusual situations when serving LEP individuals? In those situations, how did you provide language assistance?

*All respondents:*

16. Are LEP participants granted exemptions from any program requirements if language assistance services cannot be provided?

Probe:

- For example, providing required documentation, completing a recertification interview, meeting work requirements, or participating in mandatory employment and training (SNAP E&T) activities

17. If an LEP individual who is also a SNAP participant is not meeting their obligations to report changes in income, provide requested documentation, or comply with other requirements for receiving SNAP, are their language abilities accounted for when considering how to address their case? How do you typically address these challenges?

18. If an LEP applicant or participant wanted to provide feedback on their experience applying for or participating in SNAP, how would they do so?

Probes:

- How well do you think this feedback process works?
- Are there aspects of the feedback process that could be improved?

## E. Training

*Local office policy officials, local office staff, and frontline workers:*

1. Please describe the training [frontline staff/you] have received related to language access regulations, policies, and guidance for serving LEP individuals.

Probes:

- Did [frontline staff/you] receive training on language access when you first started working at the SNAP office? If so, what did that training include?
- Do [frontline staff/you] receive any ongoing training? If so, what does it include?

2. What training have you received related to Title VI of the Civil Rights Act, which prohibits discrimination on the basis of national origin and serves as the basis for requiring that language assistance services are available to LEP individuals?

- a. Do you think you have a clear understanding of Title VI? Why or why not?

3. What training have you received on 7 CFR 15 and the “USDA Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency” (USDA LEP Guidance)? This guidance references the SNAP bilingual requirements, which provide additional information on when and how to provide interpretation and translation services.

- a. Do you think you have a clear understanding of the SNAP bilingual requirements? Why or why not?



4. What training have you received on the USDA LEP Guidance, which provides information on language assistance requirements for SNAP?
  - a. Do you think you have a clear understanding of the USDA LEP Guidance? Why or why not?

*State and local policy officials:*

5. How do you determine whether other entities that provide language services such as community partners, SNAP employment and training (SNAP E&T) providers, and SNAP education (SNAP-Ed) providers understand and are prepared to meet language assistance requirements before they provide services to SNAP applicants and participants?

Probe:

- If a new LEP population is identified, how do you work with your partners to establish language assistance services for them?

*All respondents:*

6. If there are changes in [language access policies/how you are instructed to provide language access services], how are [staff, including frontline staff/you] informed of these changes?
  - a. How well do you think this process of [providing information about language access policy changes/informing you about changes in language access policies] works? Can you think of any ways in which it could be improved?

Probe:

- Thinking about the last time there was an update to the language access policies, how well do you think information about the policy update was delivered?

*State and local policy officials:*

7. In general, what is the process for communicating about language access with the [local offices/State office]
8. What is the process for [sharing language access guidance or resources with the local agency/receiving guidance or resources on language access from the State agency]?

## F. Feedback, resources, and technical assistance

*Local office managers and frontline workers:*

1. How can you provide feedback or suggestions on how to improve policies around language access or the ways in which [you serve/your office serves] LEP individuals?
  - a. Where would you submit your feedback?
  - b. What would happen after it was submitted?
  - c. If you have ever provided feedback or suggestions, what was your experience?

*All respondents:*

2. What do you think your [State/local agency] does well when it comes to serving LEP individuals?
3. What is challenging about serving LEP individuals?

4. Are there policies that are particularly challenging to follow?
  - a. If so, what specifically about the policy presents a challenge?
  - b. What difficulties have you encountered because of these challenges?
  - c. Have you been able to overcome these challenges? If so, how?
5. How do you think the challenges you've described affect LEP SNAP applicants and participants?

Probe:

- Do you think these challenges have an effect on their ability to participate in SNAP?

6. Are there additional resources or information FNS could provide that would help you serve LEP individuals?

*Local office policy officials, local office managers, and frontline workers:*

7. Are there additional resources or information the State SNAP agency could provide that would help you in serving LEP individuals?

*Local office managers and frontline workers:*

8. Are there additional resources or information your local agency could provide to help you serve LEP individuals?

*Local office policy officials and local office managers:*

9. Is there additional technical assistance you would like from FNS about Federal language access regulations and guidance?
10. Is there additional technical assistance you would like from the State agency about Federal language access regulations and guidance?
11. In general, how would you describe the State agency's communication with your office when it comes to language access regulations and guidance?

Probes:

- What works well?
- What could be improved?

*All respondents:*

12. What do you wish you had more information about regarding providing language assistance to LEP individuals?
13. Other than what we have discussed already, do you have any ideas for how your [State/local office] could improve how LEP individuals are served?
14. Is there anything else you would like to share?