

Attachment E. SNAP Local Agency Interview Protocol

My name is *[name]*, and I'm a researcher at Westat. Westat is conducting a study for the U.S. Department of Agriculture's Food and Nutrition Service, or FNS. The study will examine the data FNS needs to measure equitable program access and outcomes in State agencies' administration of work requirements and Employment and Training, or E&T, for the Supplemental Nutrition Assistance Program, or SNAP.

My colleagues and I are currently conducting interviews with SNAP State and local offices, SNAP E&T providers, and other interested parties here and in five other States. Through these interviews, we hope to collect information from a wide range of individuals involved in administering work requirements and SNAP E&T. I want to start by thanking you for taking time to speak with us today. Your perspective on and insights into these processes will be very helpful to the study.

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. You may refuse to answer any question, and you may stop the interview at any time. There will be no penalties if you choose not to participate in a part or the entirety of this interview.

We will take notes over the course of the interview and would like to audiorecord the conversation to help us remember the information we collect. We will summarize the information you share with us today and combine it with information gathered from other people we interview. Nothing you say will ever be linked to your name. Direct quotes included in our reports will be presented without the speaker's name to protect their identity.

I anticipate our conversation will take up to 1 hour. Do you have any questions for me about the project in general or what we will discuss today?

Do I have your permission to record the conversation? You may stop the recording at any time.

[Confirm permission before recording starts. Do not record without respondent permission.]

[Turn on recorder] For the purpose of the recording, are you willing to participate in this interview? And are you willing to have the interview audiorecorded?

Public Burden Statement

This information is being collected to assist the Food and Nutrition Service in examining equity in SNAP work requirements and SNAP Employment and Training. This is a voluntary data collection, and FNS will use the information to understand what data are needed to assess equitable program access and outcomes in SNAP and SNAP Employment and Training. 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-XXX. The time required to complete this information collection is estimated to average 1 hour 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 the following address: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 1320 Braddock Place, Alexandria, VA 22314, ATTN: PRA (0584-XXXX). Do not return the completed form to this address.

A. Background

Before we get started, I would like to learn more about your role and responsibilities at [SNAP local office].

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. General and Able-Bodied Adults With Dependents Work Requirements

Next, I would like to learn more about how staff screen clients for general and able-bodied adults without dependents, or ABAWD, work requirements.

1. First, I want to discuss the general work requirements. SNAP regulations require that all nonexempt SNAP participants must (1) register for work, (2) accept a suitable job if offered, (3) fulfill mandatory SNAP E&T requirements or workfare if assigned, and (4) give the State agency information regarding their employment or availability for work. SNAP participants also cannot voluntarily quit a job or reduce their hours below 30 hours a week without good cause.
 - a. How do you screen clients to determine whether someone is subject to the general work requirements? [*Probe: Is the process similar for new applications and recertifications?*]
 - b. Does the eligibility system provide any prompts or guidance for this process?
 - i. [*If yes*] Can you tell me the questions in the system? Are the prompts helpful? Is anything missing?
 - c. How do you determine whether a client is exempt from work requirements?
 - i. Do you record exemptions in the eligibility system? What exemptions are most common?
 - d. How do you determine fitness for work?
 - i. Has the State agency provided guidance on how to determine fitness for work? If yes, please describe.
2. How do clients subject to general work requirements register for work? [*Probe: website, paper form, automatic process*]
3. What challenges do you face in determining whether an individual is subject to the general work requirements?
 - a. Do you think these policies affect some groups differently? If yes, how? [*Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on Indian Tribal organizations (ITOs)*]

4. Next, I would like to discuss the work requirement and time limit for ABAWDs. In addition to the general work requirements, ABAWDs are subject to a time limit unless they meet additional work requirements.
 - a. Do local office staff participate in or contribute to decision making about which areas the State agency will include in an ABAWD waiver request? If yes, please describe.
 - b. How do you screen to determine whether a client is subject to the ABAWD time limit or is exempt? *[Note: In advance of the interview, determine whether the State currently has an ABAWD waiver. If a State has a waiver, you may need to ask these questions in the past tense. If the State has had a waiver for many years, workers may have difficulty answering these questions.]*
 - c. Does the eligibility system provide any prompts or guidance for this process?
 - i. *[If yes]* Can you tell me what questions are in the system? Are the prompts helpful? Is anything missing?
 - d. How do you inform a client they are subject to the ABAWD work requirement? Do you discuss the requirement during the eligibility interview? Do they receive a letter via mail?
 - i. Do you find the information you provide is sufficient for clients to understand their rights and responsibilities under the ABAWD work requirement and take appropriate action? Why or why not? *[Probe: client questions, reactions]*
 1. *[If why not]* What additional information or messaging would be needed?
5. What are the challenges associated with determining whether an individual is subject to the ABAWD work requirement?
 - a. Do you think these policies affect some groups differently? If yes, how? *[Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
6. How do you monitor compliance with the general work requirements? How about ABAWD work requirements?
 - a. What happens if a client is noncompliant?
 - b. In your opinion, why might some clients struggle to comply with the work requirements?
 - i. What supports, if any, could promote compliance?
7. How do you assess good cause for work registrants? How do you assess good cause for ABAWDs?
 - a. How do clients submit information for a good cause exemption?
 - b. Has the State agency provided any guidance on this process? If yes, please describe.
 - c. Does the eligibility system include any prompts to guide the assessment? If yes, please describe.

8. What challenges do you face in determining whether an individual has good cause from the general work requirements? From ABAWD work requirements?
 - a. Do you think these policies affect some groups differently? If yes, how? *[Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
9. What training do staff receive in work requirements and ABAWD policies? *[Probe: initially and ongoing]*
 - a. To what extent do eligibility staff meet with their supervisor to discuss difficult cases? Please describe.
10. Thinking broadly, are there other ways that work requirement policies may contribute to differences in access and outcomes among SNAP clients? *[Probe: disqualification policies, sanctions, time limits]*
 - a. *[If yes]* Do these policies affect some groups of people more than others? *[Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*

C. SNAP E&T Program

Next, I want to discuss the SNAP E&T program in your State agency.

1. Do local office staff participate in or contribute to decision making in the State agency's development of its SNAP E&T program? If yes, please describe. *[Probe: types of components offered, where components are offered, SNAP E&T provider selection]*
2. At what point during the eligibility interview do you screen clients for referral to SNAP E&T? *[Probe: Are there any differences between new applicants and clients recertifying their benefits?]*
 - a. What screening questions do you ask? Does the eligibility system include any prompts to guide the screening process? *[Note: If you have not already received, ask for the list of questions.]*
 - i. *[If yes]* Please describe.
 - ii. *[If no]* Do you use a checklist or some other tool? Please describe.
 - b. Has the State agency provided any guidance on this process? If yes, please describe.
3. How do you refer clients to SNAP E&T?
 - a. Are some people more likely to not receive a referral? Why?
 - b. Is the referral automatically sent to the SNAP E&T provider, or does the participant have to follow up on their own?
 - i. *[If sent to the provider]* Are you aware of any variations in how providers reach out to referred clients?
 - c. In your opinion, are some clients more likely to participate in SNAP E&T than others? What types of clients? Why? *[Note: Before the interview, add specific probes that may be most*

- relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
- i. Do you track participation in SNAP E&T? If yes, how do you track it? What is the information used for?
 4. Do local office staff conduct the SNAP E&T assessment? If yes, please describe. *[Probe: staff in the public benefits/SNAP unit and other units]*
 5. Who assigns clients to specific SNAP E&T components?
 - a. *[If local office staff]* How do you make the assignments?
 6. Does your office have a SNAP E&T liaison? If yes, what is their role? *[Probe: collaboration with SNAP E&T providers and clients]*
 7. Can you please describe the relationship between your office and the SNAP E&T providers in your area?
 - a. What data or information do you share with the providers?
 8. Thinking broadly, are there ways that SNAP E&T policies may contribute to inequities among SNAP clients? If yes, which groups are more affected by these policies? *[Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*

D. Hiring Practices and Partners

Let's discuss local office staffing and the SNAP E&T providers in your area.

1. Does your office determine who is hired and staffed at your office? If yes, can you tell me about the hiring process?
 - a. Does your office conduct any recruitment? If yes, please describe. *[Probe: materials use, recruitment fairs]*
 - b. Does your office have any equity and diversity goals related to hiring and staffing? If yes, please describe.
2. *[If ITOs are located in the State]* How, if at all, does your office work with representatives from the nearby Indian Tribal organizations?

E. Data Availability and Needs

I'd like to shift to discuss the data your office collects.

1. We know the State agency collects the following data on work registrants and SNAP E&T participants *[List responses to survey questions 46, 55, and 65]*. What, if any, additional demographic data do you collect on your clients? *[Probe: education, disability, preferred language, housing status]*
 - a. How do staff collect these data? How often are these data collected or updated?

- b. Do you have any challenges collecting or updating these data?
 - c. Do you share these data with the State agency?
 - i. If not, why not? Could these data be shared?
 - d. What factors or considerations should the State agency and FNS keep in mind when using these data?
 2. How, if at all, does your office use data on work registrants and SNAP E&T participants internally? What are your key performance measures?
 - a. Have these measures changed over time? If yes, please describe.
 - b. To what degree does your office use these data to measure and assess lack of access to SNAP E&T? Please describe.
 - c. To what extent does your office use these data to assess disparities in SNAP E&T outcomes? Please describe.
 3. What data would you like to have access to that you do not? What would you be able to do with these data if you had them?
 4. What, if any, additional data should the State agency or FNS collect to better assess disparities in access to and outcomes in SNAP E&T?
 - a. What potential data limitations should the State agency and FNS keep in mind when using these data?

F. Work Requirements and SNAP E&T Programs Access and Outcomes

Now, let's talk about where disparities could occur when administering SNAP E&T services and your ideas for how FNS could better ensure individuals have the same opportunities to access SNAP E&T and benefit from the program.

1. We already talked about some areas in the work requirement and SNAP E&T screening and referral processes that could contribute to disparities. Could any other administrative processes or procedures affect a client's ability to maintain compliance with work requirements or access SNAP E&T services? If so, please describe.
 - a. Do these factors generally affect all clients or specific groups?
 - b. *[If specific individuals or subpopulations]* Which groups do these factors affect? Why?
2. What factors may contribute to disparities in client outcomes? *[Probe: access to childcare, access to transportation, general readiness, activities that enable clients to meet their goals]*
 - a. Do these factors generally affect all clients or specific groups?
 - b. *[If specific groups]* Which groups do these factors affect? Why? *[Note: Before the interview, add specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*

3. What needs to be done to ensure all eligible individuals can participate in SNAP? How about SNAP E&T? What data can be used to measure whether all eligible individuals can participate?
 - a. What prevents eligible clients from accessing SNAP? How about SNAP E&T?
4. What needs to be done to ensure all participants who engage in SNAP E&T succeed? What data can be used to measure whether all participants succeed?
5. What should FNS prioritize to make sure everyone has the same access to SNAP and SNAP E&T and the same opportunities to benefit from the programs?

G. Wrap-Up

Thank you for answering our questions. Before we wrap up ...

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?

Those are all the questions I have. Thank you very much for speaking with us!