

## Attachment D. SNAP State Agency Interview Protocol

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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 and a half hours. 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 1.5 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 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

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I'd like to start by learning about your role and responsibilities at the SNAP agency in [State].

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 Without Dependents Work Requirements

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Now, let's talk about work requirements in [State].

4. 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. What steps must work registrants take to comply with the general work requirements? How do they register for work? *[Probe: automatic process; client must complete a form]*
  - b. How did your State agency decide on this process? Who was involved in the decision making?
  - c. Have State agency policies related to the general work requirements changed recently? How?
5. In addition to the general work requirements, able-bodied adults without dependents, or ABAWDs, are subject to a time limit unless they meet additional work requirements.
  - a. According to your survey response, [State] currently *[does/does not]* have a *[statewide/partial]* ABAWD waiver. Is that correct? *[Note: See survey questions B.1 and B.2]*
    - i. How did your State agency decide to *[apply/not apply]* for the waiver? *[Probe: State agency policies, consultation with advocacy groups, did not qualify for waiver]*
    - ii. *[If partial waiver]* How did your State agency decide which geographic areas to include in the waiver request?

*[Note: If a State agency has a waiver, you may need to ask these questions in the past tense. If the State agency has had a waiver for many years, State agency staff may have difficulty answering these questions. The Families First Coronavirus Response Act authorized FNS to issue a temporary suspension of ABAWD time limits; this suspension expired July 1, 2023, the month after the end of the public health emergency in June 2023. Tailor the questions as needed prior to the interview.]*

6. Next, I want to turn to screening, determining exemptions, and tracking compliance for both the general and ABAWD work requirements.

- a. How do eligibility workers screen clients to determine whether they are subject to the general work requirements or whether they meet an exemption? Does the State agency eligibility system include preset questions? Do eligibility workers use any other tools? *[Note: Request copies of any additional tools]*
    - i. Is this process the same for ABAWD work requirements? If no, please describe.
  - b. How does your State agency track exemptions? Are some exemptions more commonly used than others? If yes, which ones?
    - i. Is this process the same for ABAWD work requirements? If no, please describe.
  - c. How does the State agency track whether clients are complying with the ABAWD work requirements? How does the State agency track ABAWD countable months?
  - d. How does your State agency define “unfit for work” for the purposes of the general work requirements? How about for ABAWD work requirements?
    - i. What documentation must clients provide to demonstrate they are unfit for work?
  - e. How do staff assess good cause for clients who do not meet the general work requirements? How, if at all, is this information tracked?
    - i. Is this process the same for ABAWD work requirements? If no, please describe.
    - ii. What challenges are associated with determining whether an individual has good cause? Do you think some groups are affected differently by these policies? If yes, how? *[Note: Before the interview, add State-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)]*
  - f. What challenges does your State agency face in determining whether an individual is subject to the general work requirements?
    - i. Do you think these policies affect some groups differently? If yes, how? *[Note: Before the interview, add State-specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
  - g. What challenges are associated with determining whether an individual is subject to the ABAWD work requirements?
    - i. Do you think these policies affect some groups differently? If yes, how? *[Note: Before the interview, add State-specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
7. How are clients notified they are subject to work requirements, including, as applicable, general work requirements, mandatory SNAP E&T, and ABAWD time limits? *[Probe: verbally during eligibility interview, mailed notice]*
- a. Has your State agency ever solicited feedback from clients about the readability of the notices? If yes, please describe.
  - b. What challenges, if any, are there in communicating work requirements to clients? How can these be mitigated? *[Probe: alternative delivery mechanisms, such as e-notices]*

8. What training do staff receive in work requirements and ABAWD policies? *[Probe: initially and ongoing, determining unfitness for work]*
  - a. To what extent do eligibility staff meet with their supervisor to discuss difficult cases? Please describe.

*[Note: See State responses to survey questions 14–18. Tailor the following questions accordingly. If the State has a statewide ABAWD waiver, skip to question 8.]*

9. According to the survey, your State agency *[has/has not]* used ABAWD discretionary exemptions since time limits resumed in July 2023. Why or why not?
10. *[If the State has used the discretionary exemptions]* According to your survey responses, your State agency uses the following criteria to determine which SNAP participants receive discretionary exemptions: *[list]*. How did *[State]* decide on these criteria? Does the State agency consider other factors when deciding who receives ABAWD discretionary exemptions? If so, please describe.
11. We know *[State]* currently has a statewide ABAWD waiver. However, does your State agency have a policy for using discretionary ABAWD exemptions in the absence of a waiver? If yes, please describe the policy.

## C. SNAP E&T Program

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Next, I want to turn to your SNAP State agency's E&T program.

12. According to the survey, *[State]* operates a *[mandatory/voluntary/mandatory for some; see question 2]* SNAP E&T program. How did your State agency decide to operate this type of SNAP E&T program? Has the type of SNAP E&T program you operate changed recently? If yes, why?
13. *[If voluntary]* Thinking broadly, how does your State agency provide outreach and work to ensure access to SNAP E&T services to groups or communities that want to participate? What challenges do you encounter? Does your State agency have challenges providing SNAP E&T to any groups or communities? *[Note: Before the interview, add State-specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*
  - a. What outreach materials do you use?
  - b. Has your State agency ever solicited feedback from clients about the outreach materials? If yes, please describe.
14. *[If mandatory]* Does your State agency have enough SNAP E&T slots for all mandatory participants? *[If not]* How does your State agency determine who must participate in SNAP E&T and who receives a good cause exemption? Is this information tracked in your eligibility or SNAP E&T system?

15. According to your SNAP E&T State Plan, [State] offers the following SNAP E&T components: [list]. How did your State agency decide to offer these components? How did your State agency decide where to offer these components?
  - a. [If some components are not offered statewide] What factors determine where a SNAP E&T component is offered?
  - b. [If ITOs are located in the State] How does your State agency consult with ITOs about components and where to offer them? What changes, if any, were made based on ITOs' feedback?
  - c. Are there any components your State agency would like to offer but cannot? Why?
16. [If mandatory] How does your State agency screen work registrants to determine whether they are required to participate in mandatory SNAP E&T or whether they meet the State agency's criteria for exemption?
  - a. Does your State agency screen all work registrants for exemptions to mandatory SNAP E&T? If not, how did you decide which clients to screen?
  - b. How, if at all, does the SNAP eligibility system capture data related to screening and referral of mandatory SNAP E&T participants?
  - c. What exemptions does your State agency allow from mandatory SNAP E&T?
    - i. How did your State agency decide on this list of exemptions? Are some exemptions used more frequently than others? How does your State agency track exemptions from mandatory SNAP E&T?
17. Can you please describe how your State agency screens clients who volunteer for SNAP E&T to determine whether they meet the State agency's criteria for referral? Does the eligibility system contain preset questions? Do staff use any other tools? [Note: Request copies of any additional tools]
  - a. Does screening happen at initial application only? Why or why not?
  - b. How, if at all, does the SNAP eligibility system capture data related to screening and referral of individuals who volunteer for SNAP E&T?
18. How are clients referred to SNAP E&T?
  - a. Are some groups of people more likely not to receive a referral? Why?
  - b. Is the referral automatically sent to the SNAP E&T provider, or does the client need to follow up?
  - c. Are some groups of clients more likely to participate in SNAP E&T than others? Which groups? Why? How did you recognize there was a difference between groups? [Probe: data analysis, anecdotal information from providers] [Note: Before the interview, add State-specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]

19. Can you please describe how your State agency provides case management to SNAP E&T participants? *[Probe: who provides the service, how often case managers meet with clients, how case manager assignments are made, goals of case management]*
  - a. How effective do you think case management is in guiding clients to appropriate components and helping them achieve their goals? How could case management be more helpful? Do any groups require more individualized services?
  - b. Does your State agency track any data related to case management? If yes, please describe.
  
20. According to your FY 2024 SNAP E&T State Plan, your State agency allows the following reimbursable participant expenses: *[list]*. Can you please describe how your State agency decided on this list? *[Probe: consultation with providers, participants, other individuals/entities]*
  - a. How are clients informed about reimbursements? *[Probe: at the time of SNAP E&T referral, during screening, by the provider, via notice, during the eligibility interview]*
    - i. How are clients reimbursed for those costs? Are costs ever paid on clients' behalf?
  - b. *[If State has reimbursement caps; see State Plan]* How did your State agency decide to place a cap on *[list type of reimbursement]*?
    - i. What happens if a client's needs exceed the cap?
  - c. Based on previous research, we know transportation and childcare are two of the biggest barriers to SNAP E&T participation. What efforts has your State agency taken to address these barriers through your reimbursement policies? *[Probe for agreements with childcare agency, looking into rideshare options in areas with limited public transit, priority for childcare for E&T participants]*
  - d. To what extent does your State agency track reimbursements at the case level?
  
21. Thinking broadly, are there ways that SNAP E&T policies may contribute to differences in access and outcomes among SNAP clients? If yes, which groups, if any, are more affected by these policies? *[Note: Before the interview, add State-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. SNAP E&T Providers

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Now, let's discuss the SNAP E&T providers *[State]* partners with.

22. According to your SNAP E&T State Plan, SNAP E&T providers in *[State]* include *[list some examples]*. How did these providers become part of the SNAP E&T program?
  - a. What factors does your State agency consider when selecting SNAP E&T providers? *[Probe: factors such as cultural humility; whether providers and partners are staffed with people with similar lived experience or are located in neighborhoods where marginalized communities live; whether providers offer activities and components that can lead to well-paying jobs]*
    - i. Do these factors vary by geographic area or urbanicity? If so, please describe.
  - b. How does a new provider join the network?
  - c. Is your State agency actively recruiting additional SNAP E&T providers? If yes, why?

23. How does your State agency ensure SNAP E&T providers are not perpetuating wage gaps or other hiring disparities? *[Probe: alignment with State workforce development board priorities, pathways programs]*
24. Does your State agency provide training to providers on how to best meet the needs of participants and account for each participant's unique circumstances? If yes, please describe.
25. What challenges does your State agency face selecting and contracting with SNAP E&T providers? *[Probe: funding, presence in underserved areas, administrative capacity, interest, finding providers that offer relevant trainings]*
  - a. What could be done to mitigate these challenges?
26. Other than the SNAP E&T providers, does your State agency partner with any other organizations or entities, such as employers, to operate the SNAP E&T program? If yes, how did the partnership begin? What is the role of this organization?

## E. State Hiring Practices and Staff Engagement

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Next, let's shift focus to your State agency's internal hiring practices.

27. According to the survey responses, your State agency has the following hiring policies or guidance for frontline staff: *[List from survey questions 79, 80, and 81]*. Can you tell us more about these policies? What prompted your agency to implement these?
28. According to the survey responses, your State agency has the following hiring policies or guidance for SNAP leadership staff: *[List from survey questions 83–84]*. Can you tell us more about these policies? What prompted your agency to implement these?
29. What other factors does your State agency consider when hiring State and local staff? *[Probe: experience working with clients or a similar population, lived experience, cultural humility]*
30. Can you tell us more about how *[State]* recruits State agency and frontline staff? Do recruitment procedures vary between the two types of staff?

## F. Available Data and Data Needs

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I'd like to shift to discuss the data your State agency collects and reports.

31. Can you first tell me about your State's capacity to analyze the data you collect on SNAP work requirements and SNAP E&T?
32. Can you please describe your SNAP State agency's E&T system? What information is captured within the system? Who has access to it?
  - a. *[If answer to survey question 52 is two systems]* According to the survey, your State has a separate eligibility and SNAP E&T system. How do these systems interact?
  - b. *[If answer to survey question 74 is "Yes"]* According to the survey, your State has data use agreements with other agencies. Which agencies do you have an agreement with? How do



you use these data? *[Probe: unemployment insurance wage data to track SNAP E&T client outcomes]*

33. Currently, FNS asks State agencies to report data for the FNS-583 and the National Outcome Reporting Measures. What challenges, if any, do you encounter collecting and reporting these data? How could these challenges be mitigated?
  - a. Does your State agency use these data outside of reports to FNS? If yes, how?
34. Does your State agency collect data related to work requirements and SNAP E&T that are not reported to FNS? If so, please describe the data and how the data are used.
  - a. How, if at all, does your State agency use these data internally? What are your key performance indicators?
    - i. Have these indicators evolved? If yes, please describe.
    - b. What data, if any, does your State agency use to assess equitable access to SNAP and SNAP E&T and equitable outcomes?
      - i. How has your State agency used the findings from these data?
35. When your State agency was designing the SNAP E&T system or deciding on the key performance indicators, who was part of the decision-making process? *[Probe: staff at all levels, local staff, data and nondata staff]*
36. Does your team have a dedicated data analyst?
  - a. If no, who runs and analyzes requested data?
  - b. If yes, what is their capacity to analyze additional data?
37. What data, if any, are not currently collected or reported that you would need to address disparities in the administration of work requirements and SNAP E&T?
38. What factors should FNS keep in mind when collecting State agency data and using those data to assess disparities?

## **G. Work Requirements and SNAP E&T Programs Access and Outcomes**

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Now, let's talk about where equity issues could occur in SNAP work requirements and SNAP E&T and your ideas for how FNS could better assess equity in each.

39. We already talked about some areas in the work requirement and SNAP E&T screening and referral processes that may 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 procedures generally affect all clients or specific groups? *[If specific groups]* Which groups do these procedures affect? Why? *[Note: Before the interview, add State-specific probes that may be most relevant for groups in the State, such as rural individuals, racial/ethnic groups, or individuals living on ITOs]*

40. 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? *[If specific groups]* Which groups do these factors affect? Why?
41. What steps has your State agency taken to ensure all eligible clients can access SNAP as a whole? How about SNAP E&T?
  - a. What prevents eligible clients from accessing SNAP or SNAP E&T?
42. How does your State agency define successful participation in and completion of SNAP E&T? What steps has your State agency taken to ensure all individuals who participate in SNAP E&T succeed in the program? Can your State agency effectively capture all versions of “success” in your data system?
43. 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?
44. 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?
45. 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?

## H. Wrap-Up

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

46. Is there anything else you would like to share with us?
47. 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!