



# Supplemental Nutrition Assistance Program (SNAP) Language Access Study: Case Studies of Four States

Final Report

October 2024

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# Supplemental Nutrition Assistance Program (SNAP) Language Access Study: Case Studies of Four State Agencies

## Final Report

**October 2024**

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## Contents

Definitions .....	ix
Executive Summary .....	xi
Study Background.....	1
Overview of Case Studies.....	1
Research objectives .....	1
Methodology .....	1
Case study identification .....	2
Interviews with State and local SNAP staff.....	2
Document collection .....	3
Existing language data .....	4
Study Findings.....	5
Key study findings: Massachusetts.....	5
Challenges and problems that develop when serving LEP applicants and participants (Objective 1).....	5
Outside resources available to LEP applicants and participants (Objective 2) .....	6
Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3).....	7
Language landscape in local agency catchment areas (Objective 4) .....	8
Key study findings: New Mexico .....	9
Challenges and problems that develop when serving LEP applicants and participants (Objective 1).....	9
Outside resources available to LEP applicants and participants (Objective 2) .....	10
Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3).....	11
Language landscape in local agency catchment areas (Objective 4) .....	12
Key study findings: North Carolina.....	12
Challenges and problems that develop when serving LEP applicants and participants (Objective 1).....	12
Outside resources available to LEP applicants and participants (Objective 2) .....	13

Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3) .....	14
Language landscape in local agency catchment areas (Objective 4) .....	15
Key study findings: Washington .....	15
Challenges and problems that develop when serving LEP applicants and participants (Objective 1).....	15
Outside resources available to LEP applicants and participants (Objective 2) .....	16
Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3) .....	17
Language landscape in local agency catchment areas (Objective 4) .....	18
Synthesis of findings across case study States .....	19
Conclusions and Recommendations .....	20
References.....	23
Appendix A Research Questions.....	A-1
Appendix B Interview Protocols .....	B-1
Appendix C Walk-Through Protocol.....	C-1

## Exhibits

1	Definitions.....	ix
2	Number of respondents in interviews and walk-throughs.....	3
3	Poster with 18 languages.....	4
4	Prevalence of LEP for selected local agencies in Massachusetts.....	8
5	Prevalence of LEP for selected local agencies in New Mexico.....	12
6	Prevalence of LEP for selected local agencies in North Carolina.....	15
7	Prevalence of LEP for selected local agencies in Washington.....	19

## Definitions

Exhibit 1 includes definitions of important terms that are used throughout the report.

**Exhibit 1.** Definitions

Term	Definition
Bilingual services	Bilingual services involve providing staff who can converse fluently with individuals with limited English proficiency (LEP) in their primary language.
Four-factor Analysis	A Federal standard used to determine the right language assistance services to ensure individuals with LEP have meaningful access to an agency's program and activities. The USDA instructs State agencies to assess the LEP needs of the population they serve and determine the language access services required by balancing four factors, which are: 1. The number or proportion of individuals with LEP eligible to be served or likely to be encountered within the area serviced by the recipient; 2. The frequency with which individuals with LEP come in contact with the program or activity; 3. The nature and importance of the program, activity, or service to people's lives; and 4. Resources available to the SNAP State agency and the costs of language services.
Frontline staff	Frontline staff work directly, both verbally and electronically, with applicants and participants. These staff may be but are not limited to bilingual workers. Case managers are one example, but there are also other frontline staff who work directly with applicants and participants.
Interpretation	The process by which the spoken word is used when transferring meaning between languages. Interpretation involves listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
Language access coordinator	The language access coordinator coordinates and monitors the implementation of the State agency's language access plan, policies, and procedures.
Language access plan (LAP)	Agencies and departmental offices should develop a written language access plan. The plan must provide a framework for the provision of timely and reasonable language assistance and for eliminating or reducing LEP as a barrier to accessing USDA programs and activities. The plan should further outline how the goals will be accomplished.
Limited English Proficiency (LEP)	Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered to have limited English proficiency or "LEP."
Meaningful Access	Meaningful access refers to the provision of reasonable language assistance services that enable individuals with LEP to have substantially equal participation in and access to the benefits of a Federal financial assistance program or activity. These services are meaningful when they are provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the individual with LEP.



Term	Definition
Qualified interpreter	An in-house or contracted interpreter who has been professionally trained or demonstrated competence to interpret through court certification or comparable testing and is authorized to do so by approval of an agency or office. Qualified interpreters must also demonstrate knowledge of professional standards, adhere to the corresponding professional code of ethics, and be familiar with required USDA terminology.
Qualified translator	An in-house or contracted translator who has been professionally trained or demonstrated competence to translate through national certification or comparable testing and is authorized to do so by approval of an agency or office. Qualified translators must also demonstrate knowledge of professional standards, adhere to corresponding professional code of ethics, and be familiar with required USDA terminology.
Title VI of the Civil Rights Act of 1964 (42 USC § 2000d at 7 CFR 15)	This Act prohibits discrimination based on race, color, and national origin in programs and activities receiving Federal financial assistance and USDA implementing regulations.
Translation	The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
USDA Title VI regulations at 7 CFR Part 15, Subpart A, “Nondiscrimination in Federally assisted Programs of the Department of Agriculture - Effectuation of Title VI of the Civil Rights Act of 1964”	This regulation ensures no person in the United States is subject to discrimination on the basis of race, color, or national origin in any program or activity that receives Federal financial assistance from USDA. This regulation includes, but is not limited to, States and Territories that administer SNAP. These regulations also outline grievance procedures.
Vital documents	Written material, either hard copy or electronic, that contains information critical for accessing a program or activity or required by law. Examples are consent forms, applications, and notices of rights.

## Executive Summary

This report provides findings on language access policies, plans, and procedures in Supplemental Nutrition Assistance Program (SNAP) agencies in four States at the State and local agency levels: (1) Massachusetts, (2) New Mexico, (3) North Carolina, and (4) Washington. The study team conducted case studies in each site—interviewing State and local agency SNAP staff, collecting documents related to language access, and examining census data to better understand the context for language access within the four States. The study’s main findings are:

- Local agencies mainly provided language assistance through telephonic interpreter services. Local agencies in these case studies also used bilingual workers to provide language assistance services. Specific practices within these services and any additional services provided varied across the States.
- The number and percentage of individuals with limited English proficiency (LEP) and the most commonly spoken languages other than English varied significantly among the States and, at times, within them.
- Staff in three States reported a clear understanding of federal LEP policies, federal regulations, and statutes related to language access.
- All four States communicated with local agencies about language access through email, an online system, or both and reported that these forms of communication worked well.
- Local agencies in the case study States faced similar challenges when serving individuals with LEP, including limited staff training, lack of translated documents, limited numbers of in-house interpreters and bilingual staff, technical and quality issues with telephonic interpreter services, and individuals with LEP not understanding SNAP processes because of cultural differences.
- Staff requested that State agencies provide translated documents in more languages than currently available and offer additional supports for interpretation and bilingual services.

Given these findings, the study team recommends that SNAP agencies comprehensively train new and existing staff on how to provide consistent and meaningful access to SNAP for individuals with LEP. The study team also suggests that the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) provide support and resources to assist SNAP agencies in serving all individuals with LEP, including those who do not speak a language commonly encountered by a State agency or in local offices, such as by translating vital documents. New technology, such as headphone splitters and extra handsets, to facilitate the use of telephonic interpretation services, which are commonly used by local agencies, would also be beneficial. Additional support from State agencies to hire qualified in-house interpreters and qualified bilingual staff for direct in-language communications would also support local agencies’ ability to provide language assistance services. Finally, the study team recommends that future research include the experience of individuals with LEP, to understand how language access services could better meet their needs.

## Study Background

SNAP is an essential component of the U.S. domestic safety net. It provides a monthly benefit for households to spend on food, which helps ensure that those with low incomes can access enough nutritious food to lead healthy, active lives. FNS administers SNAP in partnership with 53 State agencies—the 50 States, the District of Columbia, Guam, and the U.S. Virgin Islands.

State agencies that receive federal financial assistance to administer SNAP are required to comply with Title VI of the Civil Rights Act of 1964 and its implementing regulations for the USDA at 7 CFR 15 (U.S. Department of Justice Civil Rights Division, n.d.). SNAP State agencies must take reasonable steps to ensure meaningful access to the program. They must have policies and procedures to ensure that materials such as applications, recipient notices and information on digital platforms, and information on program requirements are available in languages that meet the needs of program applicants and participants. Additionally, agencies must ensure that program staff are trained on procedures to provide meaningful access to program information for individuals with LEP, including the use of qualified interpreters.

The purpose of the SNAP Language Access Study is to provide FNS with a comprehensive understanding of the language landscapes that SNAP and Nutrition Assistance Program agencies operate in as well as their language access policies and operations landscapes. This report covers study findings from case studies on language access policies, plans, and procedures in SNAP agencies in four States at the State and local agency levels.

## Overview of Case Studies

### *Research objectives*

The case studies had four research objectives, each with multiple research questions (see appendix A):

1. Describe the challenges and problems that develop when serving LEP applicants and participants.
2. Describe the language-related resources available to LEP applicants and participants.
3. Collect local agency staff perceptions about federal LEP policies, federal regulations, and statutes.
4. Describe the language landscape around the selected local agencies.

## Methodology

The case studies present a detailed, in-depth exploration and analysis of language access policies and language assistance services in four States, at both the State and local agency levels. This section discusses the methods used to select States and collect data.

### ***Case study identification***

The study team identified States based on responses to a survey distributed to all 53 State agencies administering SNAP, which suggested that they followed Federal Agency guidance for assisting individuals with LEP, including having a language access plan and using four-factor analysis. The study team also intentionally sought both State- and county-administered SNAP agencies from across the country to include a diversity of agencies in the case studies. In consultation with FNS, the study team selected four States for case studies: (1) Massachusetts, (2) New Mexico, (3) North Carolina, and (4) Washington.

SNAP is administered by the State in Massachusetts, New Mexico, and Washington. In North Carolina, SNAP is administered by counties and supervised by the State. Many program functions, including language access policies, are the responsibility of the 100 counties within North Carolina, which are overseen by the Division of Social Services in the State's Department of Health and Human Services. The SNAP administering agency in Massachusetts is the Department of Transitional Assistance (DTA). In New Mexico, it is the Income Support Division in the State's Human Services Department. In Washington, it is the Department of Social and Health Services (DSHS).

After selecting the four States, the study team held planning calls with State-level contacts to introduce the study, answer questions, and identify the State staff and local agencies that would participate. The study team requested that the local agencies be within driving distance of the State capitol and for at least one agency to serve a rural area and one agency to serve an urban area.

After the local agencies were identified, the study team held planning calls with them to introduce the study and answer questions. During or shortly after the planning calls, the study team worked with State and local agencies to schedule dates for in-person site visits. These visits took place over two and a half days and included interviews with State and local agency staff. The study team conducted virtual interviews if staff were unavailable during the in-person visit.

### ***Interviews with State and local SNAP staff***

The study team conducted hour-long, semi-structured interviews with State agency officials who formulated policies, plans, and procedures for each State agency's SNAP language access program. The team's interviews determined how the State agency (1) established its language access policy, (2) oversaw language access policies, (3) trained frontline workers on its language access policy and procedures, and (4) addressed civil rights complaints involving language access. Two team members conducted each interview: one led the conversation, while the other took detailed notes and asked probing questions, as necessary, to clarify responses and ensure accuracy. Exhibit 1 shows the number of State respondents and format of interviews conducted in each State.

The study team also conducted semi-structured, in-person interviews with local policy officials who implemented the language access policies, plans, and procedures; office managers; and frontline workers. In addition, the study team conducted verbal walk-throughs of the steps for applying for SNAP and completing the recertification process to understand how individuals with LEP would experience them. Interviewers asked probing questions to determine how the processes would differ for an individual who speaks a commonly encountered language and for someone who speaks a language not commonly encountered by the local agency.

The study team conducted walk-throughs in two local agencies per State, except in North Carolina, where only one walk-through was done because of scheduling constraints at one local agency. Each walk-through conversation involved speaking with three respondents: (1) a front desk worker, (2) an eligibility worker, and (3) an eligibility worker supervisor. If the team scheduled an interview and walk-through with the same supervisor, interviewers revised the questionnaire to reduce time and topic overlap. Exhibit 2 shows the number of respondents and the format of the interviews conducted in each State.

**Exhibit 2.** Number of respondents in interviews and walk-throughs

State	Number of State interview respondents (and format)	Number of local agency interview respondents (and format) <sup>a</sup>	Number of walk-through respondents (and format)
Massachusetts	3 (virtual)	9 (in person)	6 (in person)
New Mexico	3 (2 in person, 1 virtual)	9 (in person)	6 (in person)
North Carolina	3 (2 in person, 1 virtual)	8 (in person)	3 (in person)
Washington	3 (virtual)	11 (in person)	6 (in person)

<sup>a</sup> Interviews were one-on-one except for one in-person interview in North Carolina and three in-person interviews in Washington that had two respondents each.

**Document collection**

The study team collected copies and took pictures of relevant documents and signs at the local agency, when possible—including, SNAP application and recertification paperwork, “I Speak” signs in multiple languages, Electronic Benefits Transfer (EBT) card notices, application reminders, and posters with a list of common languages. For example, a sign from a local agency in New Mexico (Exhibit 3) had a list of 18 languages with text in each language that stated: “Point to your language. An interpreter will be provided at no cost to you.”

Exhibit 3. Poster with 18 languages



**Existing language data**

To understand the language context in local SNAP agencies, the study team gathered and synthesized American Community Survey five-year estimates, Vintage 2020, including Public Use Microdata Area (PUMA) data. This provided the number and proportion of the LEP population ages 5 and older who were living at or below 130 percent of the federal poverty level (FPL), both at the State level and in catchment areas served by local agencies. The catchment area was determined by reviewing lists of cities and towns served by each local agency or maps of the distribution of local agencies in each State if a list was not available. The study team tried to align the local agency service areas to the PUMA data as closely as possible. However, this was not feasible in some instances, so data for areas other than those served by the local agency had to be included. For example, some local agencies were included in PUMAs that covered multiple counties beyond their service areas. Through interviews, the study team also gathered data on the common languages spoken among individuals with LEP who were served by those local agencies.

## Study Findings

### **Key study findings: Massachusetts**

#### *Challenges and problems that develop when serving LEP applicants and participants (Objective 1)*

The DTA, which is the SNAP administering agency in Massachusetts, reported some challenges in serving individuals with LEP. DTA identified the main challenge as the lack of key documents in languages frequently used by individuals with LEP in the State, such as Haitian Creole for the Notice of Requested Verification and Russian for online applications. Staff noted that to address this challenge, individuals with LEP often go to a local agency for interpretation assistance or they find a friend, family member, or advocate to interpret for them.

Although translations are not available in all languages, interpretation services do cover all languages spoken by individuals with LEP in Massachusetts. Most interpretation occurs via telephonic interpretation services. Staff reported that these services are generally high quality and are usually available with little waiting. However, for rare languages or languages with increasing demand (because of the arrival of new immigrant groups, for example), the wait times can sometimes be long because the interpretation services have yet to hire additional interpreters to meet the demand. Staff also reported occasional poor telephonic interpretation services, such as background noise or inaccurate interpretation, which could be determined when a staff member also spoke the language but was not certified to provide bilingual services or when individuals with LEP responded in ways that did not seem to make sense. There is no specific guidance for what staff should do in these situations.

In addition, staff noted that interpretation via the telephone can be more challenging and time-consuming and less client-friendly than when bilingual staff provide interpretation services or direct in-language communication assistance. Because agency staff fully understand SNAP policies and procedures, they are well positioned to explain this complex information to participants directly. Staff also noted that sometimes a particular word does not exist in another language or an interpreter's translation of a word or phrase may not correctly convey its meaning within the SNAP context. For these reasons, most staff respondents suggested that the bilingual staff facilitate SNAP services for individuals with LEP better than the interpretation services.

In Massachusetts, SNAP workers receive limited training on and reinforcement of language access policies and procedures. Most interviewed staff recalled no specific training on language access requirements during their new employee training. Instead, they learned how to contact the telephonic interpretation service and received any guidance on LEP procedures from their supervisors. Additionally, bilingual workers receive no training on their duties related to serving LEP applicants and participants. They receive the same trainings that non-bilingual staff do. At times, this lack of training can lead to inconsistency when assisting individuals with LEP, because staff rely on locally developed procedures or their personal judgment when deciding how to assist them. For example, staff at some local agencies stated that they would never

allow a child to interpret for their parent, while staff at other local agencies said this does happen occasionally.

Finally, staff noted that cultural differences can also make it challenging to assist individuals with LEP. Those who come from other cultural backgrounds may find it challenging to understand and feel comfortable with SNAP agency processes. For example, the concept of a SNAP household may be confusing to LEP participants whose concept of a household may differ from how SNAP defines a household. Moreover, some individuals with LEP are illiterate in their own language, so SNAP workers may still find it challenging to ensure that they can participate fully in SNAP even with translated materials.

*Outside resources available to LEP applicants and participants (Objective 2)*

In Massachusetts, local DTA agencies provide interpretation services through contracted telephonic interpretation services and bilingual workers and provide translation services through a contracted service or bilingual workers. Separate State or local government agencies within Massachusetts do not provide interpretation or translation services for DTA. Counties or cities within the State do not provide their own interpretation or translation services for DTA either. To assess the qualifications of bilingual workers to communicate in a language other than English and to provide interpretation and translation services, DTA staff conduct oral and written examinations before a worker is certified as bilingual.<sup>1</sup>

Typically, when entering a local agency, individuals with LEP identify themselves by telling staff in their own language or in English that they speak a different language, pointing to their language on an “I Speak” poster, filling out a form in the lobby in their own language, providing their case information for the staff to look up their primary language in the case monitoring system, or simply by not understanding or responding to the staff’s greeting. When calling DTA on the telephone,



“They tell you [they are an individual with LEP]. I want to make sure they understand me, because it is very important information they are getting. If I feel they aren’t understanding [English], I am going to call the language line, [because this is] very serious, you know?”

—Massachusetts local agency respondent

individuals with LEP identify themselves by selecting their preferred language in the Interactive Voice Response system, telling staff in their own language or in English that they speak a different language, or providing their case information so staff can look up the primary language in the case monitoring system. As soon as local agency staff determine that someone is an individual with LEP, they are required to offer an interpreter unless the individual explicitly waives their right to one.

Occasionally, SNAP participants bring a friend, family member, or advocate to interpret for them. However, the local agency is required to offer a qualified interpreter (through the

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<sup>1</sup> Under a federal requirement, SNAP offices must use qualified interpreters and translators. Certified typically refers to a professionally recognized testing and training program that meets specific standards. In this report, the terminology that interview respondents used to describe their certification process is included. However, this may or may not line up with federal definitions.



telephonic service) or a bilingual staff member. If participants with LEP prefer to use their friend, family member, or advocate, then that person needs to be age 18 or older. Participants also need to provide verbal permission for DTA to speak with that individual, but they do not need to complete a waiver. Advocates who commonly interpret for individuals with LEP may come from a place of worship, legal services organization, or nongovernmental organization that serves a specific cultural or language group. DTA does not consider these advocates to be qualified, trained interpreters.

Local agency staff track language access services within their regular case monitoring system. Each SNAP participant's case record includes the primary language. In addition, every time staff interact with the participant, they record in the case narrative any language services provided—such as interpretation through the telephonic service and the interpreter's ID number—or note if a bilingual worker spoke with a participant in a language other than English. They also typically record in the case narrative whether a participant waived their right to an interpreter.

*Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3)*

Although local agency SNAP workers understood the importance of providing interpreters for LEP applicants and participants, they generally did not know Title VI of the Civil Rights Act of 1964, 7 CFR 15, the SNAP bilingual regulations at 7 CFR 272.4(b), or USDA LEP Guidance by name or understand them in detail. Most DTA staff explained that their main impression of these statutes, regulations, and policies was that it is critical to not discriminate against anyone, which includes always offering an interpreter when an individual requests one or when they seem to need one to be able to participate fully in SNAP. However, staff were not able to define these statutes, regulations, and policies, and a majority did not recall receiving any training on them.

Staff requested additional resources from FNS or DTA that would assist them in serving individuals with LEP—particularly, documents and materials translated into more languages. If vital documents such as SNAP applications and materials such as notices in local agency lobbies were translated into more languages, participation in SNAP would be easier for individuals with LEP. Participants could also avoid visiting local agencies in person just for assistance with translating documents, which is common. Staff also requested more bilingual workers. They noted that direct assistance from bilingual workers is faster and more client-friendly than interpretation through the telephonic line.

They suggested that DTA also prioritize bilingual staff assistance over interpretation in its LEP guidance and procedures, such as by assigning individuals with LEP to staff who speak the same language. However, local agencies have limited resources for hiring bilingual workers and sometimes find it challenging to identify qualified applicants for these jobs. For example, it can be difficult to find individuals both fluent in an uncommonly spoken language in the area and who hold a required degree or certification. Additional financial resources from DTA or FNS to support bilingual workers or fund certifications would be helpful. Staff had a few other suggestions for resources that could be helpful, including resource lists in different languages,

voicemail message translation options, a tool such as Google Translate for quick in-office questions, and video interpretation services.

Although SNAP workers did not specifically note that they would like trainings on the statutes, regulations, and policies that guide language access procedures, they suggested that additional trainings specifically on interpretation procedures would be helpful. This would include guidance on best practices for working with interpreters and participants during interpretation. Many DTA staff learned the most effective strategies for interpretation on their own, such as speaking directly to the participant and not to the interpreter, but they would appreciate more detailed guidance at the agency level.

Finally, communication between the State and local agencies occurs in several ways. The State agency primarily provides information about language access to the local agencies through emails and updates to the Online Guide, a repository of DTA’s SNAP policies and procedures. Local agencies can communicate questions or issues regarding language access to the State agency through their local agency management.

*Language landscape in local agency catchment areas (Objective 4)*

Overall, 20.1 percent of people ages 5 and older who live at or below 130 percent of the FPL in Massachusetts are classified as LEP. See Exhibit 4 for the DTA local agencies included in this study.

**Exhibit 4.** Prevalence of LEP for selected local agencies in Massachusetts

Local agency	Percentage of individuals in service area who have LEP <sup>a</sup>	Number of individuals with LEP in service area <sup>a</sup>	Most spoken languages among individuals with LEP, according to agency staff <sup>b</sup>
Local Agency 1 <sup>c</sup>	13	5,822	Haitian Creole, <sup>d</sup> Cape Verdean Creole, Portuguese, Spanish
Local Agency 2 <sup>e</sup>	4	885	Haitian Creole, Spanish, Portuguese
Local Agency 3 <sup>f</sup>	23	9,231	Haitian Creole, Spanish, Portuguese, Chinese, Vietnamese, Russian

Source: 2020 American Community Survey (percentage and number of individuals with LEP) and interviews with local agency staff (most common languages).

<sup>a</sup> Of people ages 5 and older who live at or below 130 percent of the FPL.

<sup>b</sup> The languages identified in this table were reported by respondents and may not reflect the most spoken languages of the SNAP-eligible population.

<sup>c</sup> These data include four PUMAs that mostly but not completely align with the Local Agency 1 service area. The PUMA that includes only the city where Local Agency 1 is located has a higher LEP rate, at 23 percent.

<sup>d</sup> Haitian Creole has recently become the most commonly heard language besides English in all of these local SNAP agencies.

<sup>e</sup> Recent migration into the Local Agency 2 service area since these data were collected in 2020 suggests that the current concentration of individuals with LEP may be higher.

<sup>f</sup> These data include three PUMAs that mostly but not completely align with the Local Agency 3 service area. The PUMA that includes the city where Local Agency 3 is located and the city next to it has a higher LEP rate, at 33 percent.

**Key study findings: New Mexico**

*Challenges and problems that develop when serving LEP applicants and participants (Objective 1)*

Staff in New Mexico noted multiple challenges in serving individuals with LEP. A main challenge that local agencies in New Mexico identified is difficulty utilizing the telephonic interpretation service. Generally, this service provides interpretation for all languages. However, for uncommon languages—such as Zuni (an Indigenous language in New Mexico) or Sango (the primary language spoken in the Central African Republic)—an interpreter is not always readily available. In these instances, local agency staff must schedule an appointment for the participant to return when an interpreter will be available.



“Sometimes we’re just happy when [the language line] answer[s]. It’s very time-consuming. If five out of six caseworkers are on [the language line], it can be very time-consuming. Sometimes it’s just one basic sentence you need interpreted, but you still have to go through a whole process.”

—New Mexico local agency respondent

Staff noted that it can be difficult to communicate this when the participant does not speak English or bring an interpreter with them. When local agency staff do connect with an interpreter immediately, it is still a lengthy process. Some local agencies must pass their headsets back and forth with the participant because they do not have additional sets. Other local agencies perform a three-way call with the language line in the lobby, which unfortunately produces significant background noise during the call.

Although the process may be time-consuming, local agencies can provide interpretation services in any language. However, they can provide translated applications in only four languages: (1) Spanish, (2) English, (3) simplified Chinese, and (4) Vietnamese. Individuals with LEP receive a default copy in English if their primary language is not one of these four. Staff noted that these participants may not understand the forms and notices they receive and may seek assistance from a family member or friend who can translate for them or work with an interpreter at the local agency to fill out the form. If bilingual staff are available, the participant will meet with them to walk through their questions. If not, the next available staff will call the telephonic interpretation service to walk them through the application with an interpreter.



“We usually tell them to come back the next day instead of scheduling, because our system is down so we can’t even schedule appointments. We open our doors at 8 a.m. Our internet service in the office is slow, so this happens frequently over the last two months. This is a challenge, because we’re unable to assist our customers when the system is down and unable to help them.”

—New Mexico local agency respondent

Finally, some local agencies experience recurrent issues with the internet. These types of structural problems make language access issues even more challenging. When this happens, their entire eligibility system shuts down and they are unable to assist participants. Local agency staff must then make an

announcement that they are unable to help until the problem is resolved. Although this impacts all SNAP participants, it is especially challenging for individuals with LEP when bilingual staff are not available to explain the situation in a language that they can understand.

*Outside resources available to LEP applicants and participants (Objective 2)*

In New Mexico, local agencies offer translation and interpretation services through bilingual workers and the State-contracted telephonic interpretation service. Bilingual workers affirm their ability to communicate in a language other than English and to provide interpretation and translation services. However, the State is incorporating a new standard of fluency, the Interagency Language Roundtable scale, within its upcoming language access plan. This five-level proficiency scale measures language ability across different skills such as listening, reading, speaking, and writing. Bilingual workers who meet this standard will receive a 20 percent hourly pay differential.

The telephonic interpretation service is contracted through an outside vendor. Interpreters that work for the service are employed by the vendor and are required to meet a certain level of fluency to be qualified. Local agency staff prefer to provide translation and interpretation services through bilingual workers because it is quicker and more efficient for them and for the individual with LEP.

The State also contracts with the Community Outreach Program for the Deaf, which provides sign language interpretation services. These appointments must be scheduled in advance because they are in person.

Local agencies partner with several advocacy organizations, such as Lutheran Family Services or Catholic Charities. These organizations work with refugee populations and often refer individuals with LEP to the agency. The organizations also provide translation and interpretation services. Agencies do not question whether interpreters from these organizations are qualified because they work with them often and trust that they are providing competent services. However, they do not contract with them. Other State or local government agencies do not provide interpretation or translation services for local SNAP agencies. Additionally, counties and cities within the State do not provide interpretation or translation for local SNAP agencies.

When an individual with LEP enters a local agency, the clerk or front lobby staff meet them first. Local agency staff explained that it is rare for an individual with LEP to speak no English at all. Generally, staff can communicate with the individual enough to understand that they need interpretation services. If they are unable to communicate even this, the staff member will point to a poster that is displayed at every window in the local agency. This poster lists 18 languages and contains a bilingual tagline about the availability of free language assistance services. Individuals with LEP can use this poster to point to the language they need. The telephonic interpretation service also has additional languages, which are listed on the local agency staff's screen. Once staff access the line, participants can point to the language they need.

Occasionally, a participant brings a family member or friend to interpret, which the local agency allows if the interpreter is age 18 or older. However, the participant must still be offered interpretation services by the local agency, even if they wish to deny these services and use their own interpreter. If the participant opts to use their own interpreter, they must fill out a form that confirms they are waiving their right to an interpreter. Local agency staff then save this form in the participant's file.

Local agency staff track language access services through case notes within their internal case monitoring system. All local agency staff are required to document whether interpretation or translation services were used and which language was needed. If the telephonic interpretation service is used, local agency staff also document the interpreter number for the assigned interpreter. Local agencies require case comments, so it should already be documented in the participant's file that they need an interpreter.

*Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3)*

Staff reported a clear understanding of Title VI of the Civil Rights Act of 1964, 7 CFR 15, the SNAP bilingual regulations, and USDA LEP Guidance through annual trainings that the State offers. Staff were generally familiar with the names of statutes, regulations, and policies but occasionally needed the definition of a term or title before confirming that they understood.

In addition to the annual trainings, the State agency communicates with local agency staff about language access in two ways. The State agency sends daily updates about SNAP policy or procedures via email to all SNAP employees, which includes updates related to language access when they occur; however, local agency staff have a high caseload and do not always have time to keep up with these messages. Therefore, all SNAP staff also use the Quick Guide, an internal database that houses information on processes, procedures, terminology, and so on. They are instructed to reference the Quick Guide often. All updates and communications from the State are posted there as well.

Staff requested additional resources from FNS and the State to assist them in serving individuals with LEP. Local agency staff requested additional interpretation services, such as a second vendor, when the telephonic interpretation service is unable to provide an interpreter for uncommon spoken languages. Staff also requested that documents, such as applications and recertification forms, be translated into more languages, such as Navajo or Zuni. Finally, they requested updated civil rights trainings, because they feel that the current trainings are outdated and monotonous. They would like to see new videos that address current scenarios staff face when serving individuals with LEP.

Staff want to know what other States are doing to serve individuals with LEP. They feel that in-person interviews are quicker and more effective than using an interpreter through the telephonic interpretation service. Providing higher pay for bilingual local agency staff or hiring in-house interpreters to provide in-person services would be helpful. In addition, one staff member requested an immigration ambassador at every local agency, because immigration cases differ in how they are coded and addressed. For example, regulations are in place for

different circumstances within immigration cases, such as how the individual arrived in the United States. Immigration ambassadors must understand the category that the case belongs in, code it correctly, and determine whether individuals with LEP who are seeking SNAP qualify for benefits. Although LEP status does not directly relate to immigration status, staff noted that many individuals with LEP are immigrants who have recently arrived in the United States. Assisting these individuals involves assessing eligibility based on immigration status.

*Language landscape in local agency catchment areas (Objective 4)*

Overall, 13.7 percent of people ages 5 and older who live at or below 130 percent of the FPL in New Mexico are considered LEP. Exhibit 5 lists the local agencies included in this study.

**Exhibit 5.** Prevalence of LEP for selected local agencies in New Mexico

Local agency	Percentage of individuals in service area who have LEP <sup>a</sup>	Number of individuals with LEP in service area <sup>a</sup>	Most spoken languages among individuals with LEP, according to agency staff <sup>b</sup>
Local Agency 1 <sup>c</sup>	14	6,722	Spanish, Navajo, Zuni
Local Agency 2 <sup>d</sup>	6	1,911	Spanish, Arabic
Local Agency 3	13	4,195	Spanish, Sango (language native to the Central African Republic), Swahili, Kirundi (language native to Burundi), Kinyarwanda (language native to Rwanda), French

Source: 2020 American Community Survey (percentage and number of individuals with LEP) and interviews with local agency staff (most common languages).

<sup>a</sup> Of people ages 5 and older who live at or below 130 percent of the FPL.

<sup>b</sup> The languages identified in this table were reported by respondents and may not reflect the most spoken languages of the SNAP-eligible population.

<sup>c</sup> Data for this PUMA included two other counties in addition to Local Agency 1.

<sup>d</sup> These data included two PUMAs.

**Key study findings: North Carolina**

*Challenges and problems that develop when serving LEP applicants and participants (Objective 1)*

In North Carolina, there are some key challenges that impact service to individuals with LEP. Local agency staff noted that one main challenge is the lack of translation for key documents in the office such as applications, letters, and recertification forms in languages other than English or Spanish. Individuals with LEP who speak a less commonly encountered language receive a default form in English, which can be challenging to read and understand. Other local agency staff noted that the online



“If we send a notice or if something happened to their case, understanding a letter they get in the mail can be confusing in any language. To have to go through a route and get a callback can be frustrating. It’s comforting to have someone to speak to in your language. The written communication might be more of the confusion piece. We try hard to make sure it’s done timely, but getting interpreters adds time.”

—North Carolina local agency respondent

application is offered in 15 languages on the State agency website. However, not all staff were aware of this fact.

Generally, interpretation services are helpful and run smoothly, especially when local agencies have in-house interpreters available. However, if an in-house interpreter is not available or an uncommon language is needed, the agency uses a telephonic interpretation service. Occasionally, interpreters are not readily available on the service. When this occurs, the individual with LEP must return on a scheduled date. Even when an interpreter is immediately available, staff noted that interpretation is a time-consuming process because of the back-and-forth between the interpreter, participant, and staff member. In addition, when using the telephonic interpretation service at the front desk, staff must physically pass the phone back and forth across their window to the participant, which slows down the process.

Finally, staff noted that individuals with LEP might not fully understand some aspects of SNAP, such as using their EBT card or providing feedback on their experience in applying for SNAP. For example, some individuals with LEP experience challenges with activating their EBT card because the instructions on the back of the card are only in English. If they do not have someone to help translate these instructions, they must call or visit the local agency for assistance. This poses an additional barrier for participants, particularly if they lack transportation. Another staff member noted that individuals with LEP may fear providing feedback on their services or may not understand that they can provide feedback.

*Outside resources available to LEP applicants and participants (Objective 2)*

In North Carolina, interpretation and translation services are provided by in-house interpreters, bilingual local agency staff, or the contracted telephonic interpretation service. The availability of qualified in-house interpreters who are permanent employees varies by local agency. In addition, smaller agencies in more rural areas do not have as many resources and may not have any bilingual staff or in-house interpreters available. These agencies utilize the telephonic interpretation service administered by the State agency for all of their interpretation needs.

The qualifications of bilingual local agency staff and in-house interpreters to communicate in a language other than English and to provide interpretation and translation services are assessed through an oral examination using the SNAP application. Staff must complete an assessment demonstrating that they can converse and complete the application form, which is evaluated by the compliance officer. To be considered certified as a bilingual worker by the agency, they must also attend an annual interpretation training, where they receive a certificate of completion.

Some local agencies also partner with outside organizations for sign language interpretation. SNAP workers did not specify whether these advocates are qualified, competent interpreters and translators. They connect with advocacy groups for the Hispanic and Latino community as well. However, these groups function more as liaisons and do not provide interpretation services. Separate State, city, and local government agencies do not provide interpretation or translation services to local SNAP agencies.

Local agency staff determine whether someone is an individual with LEP when the individual tells them in their own language or in English that they need an interpreter, points to their language on an “I Speak” poster, shares a message on their cell phone, or provides their case information for the staff to look up their primary language in the case monitoring system. Staff are required to offer an interpreter to individuals with LEP unless they explicitly waive their right to one, which may occur if the individual with LEP brings a family member or friend to interpret. Local agencies allow this; however, the interpreter must be age 18 or older and the individual with LEP must sign a form acknowledging their request to use their own interpreter.

Local agency staff track and record language access services through their internal case monitoring system. They record the reason for a participant’s visit and note whether language access services were needed. If they were, staff also record the participant’s primary language and the type of language services used. If the telephonic interpretation service was used, staff use a separate spreadsheet to input the interpreter ID number, language used, and amount of time it took to provide the language access services.

*Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3)*

Staff reported a clear understanding of Title VI of the Civil Rights Act of 1964, 7 CFR 15, the SNAP bilingual regulations, and USDA LEP Guidance through the annual civil rights trainings that the State offers. However, some were unsure about the specific names of the regulations and guidance.

Staff requested additional resources and information from FNS and the State. Local agency staff requested that the telephonic interpretation service provide more languages and that documents and forms be translated into more languages that can be accessed through their internal case monitoring system. Staff would also like resources for additional interpretation services. Local agencies are experiencing high turnover among their staff, so they do not consistently have in-house interpreters available. One staff member highlighted the rapidly changing language landscape in the State, especially over the past five years, which requires additional resources to meet the needs of these emerging populations. Finally, local agencies want to know what other States and local agencies are doing to serve individuals with LEP.



“Populations are very transient and mobile today. It’s not always going to be on the federal level—it will take all three levels to continue to build infrastructure to support rapid change of populations that enter and exit the State. This is a big challenge and is what we’re facing.”

—North Carolina State agency respondent

The State agency communicates with local agencies through mass emails known as terminal messages. The State agency also has a program compliance section chief who oversees the entire State. The section chief is the point person for every local agency and answers all questions related to civil rights.



One staff member was concerned that an individual with LEP might not disclose that they were having trouble with an application or recertification and lose their benefits simply because they did not understand the form. This staff member was unsure whether recertification issues are more common among individuals with LEP, but would like to see these data, if available.

*Language landscape in local agency catchment areas (Objective 4)*

Overall, 8.9 percent of people ages 5 and older who live at or below 130 percent of the FPL in North Carolina are considered LEP. Exhibit 6 lists the local agencies included in this study.

**Exhibit 6.** Prevalence of LEP for selected local agencies in North Carolina

Local agency	Percentage of individuals in service area who have LEP <sup>a</sup>	Number of individuals with LEP in service area <sup>a</sup>	Most spoken languages among individuals with LEP, according to agency staff <sup>b</sup>
Local Agency 1 <sup>c</sup>	9	2,949	Spanish, Arabic, French, Vietnamese, Ukrainian, Mandarin Chinese
Local Agency 2	13	3,238	Spanish, Burmese

Source: 2020 American Community Survey (percentage and number of individuals with LEP) and interviews with local agency staff (most common languages).

<sup>a</sup> Of people ages 5 and older who live at or below 130 percent of the FPL.

<sup>b</sup> The languages identified in this table may not reflect the most spoken languages of the SNAP-eligible population.

<sup>c</sup> The data for this PUMA included one other county in addition to Local Agency 1.

**Key study findings: Washington**

*Challenges and problems that develop when serving LEP applicants and participants (Objective 1)*

In Washington, serving individuals with LEP generally went well, but there were some key challenges. DSHS agency staff noted that one main challenge was the slow translation process for documents. For staff in local agencies who assist participants in person, the process involves sending documents to a contracted company for translation. For staff in call centers who assist participants over the phone, it involves an initial step of sending the document to an in-office staff member. Although translation is supposed to occur within one week, it can take longer.

This process can sometimes hold up processing of a SNAP application or recertification and may impact timeliness rates.

Generally, interpretation services run smoothly, but at times local agency staff have trouble reaching an interpreter through the contracted telephonic interpretation services for uncommon languages. Sometimes there is a wait for an interpreter in that language, such as when there are not enough interpreters to serve a newly arrived immigrant group, or



“If [a Russian speaker] comes in ... who needs SNAP, they might ask if the [Russian-speaking social worker] is available. Clients and staff would rather have someone standing next to them... But I also can’t afford to have my staff [interpreting] all the time. I use them for short interactions in the lobby, but once you pull them to interview them, you would just call the language line because in that time, they could have done two to three cases on their own.”

—Washington local agency respondent

there are no interpreters available at all, such as for specific Mayan dialects. In these cases, staff follow different procedures to serve the individual with LEP, including asking the participant to come back at another time when there may be an available interpreter (they cannot preschedule an appointment for a specific language); using an interpreter for a language that is not the individual with LEP's first language but is one the LEP individual can speak; or relying on friends or family, depending upon the situation. If the telephonic interpretation service seems inaccurate or there are other issues with the service, local agency staff are told to report the interpreter's ID number to the language access coordinator for their office.

Although staff perceived the telephonic interpretation service as generally good, they prefer using what the State considers to be certified bilingual staff or contracted in-person interpreters to serve individuals with LEP. They believe participants are more comfortable with this more direct communication. However, agencies do not have enough of these staff to cover the most spoken languages in offices or to fully cover the in-house Spanish or Russian telephone lines. This is primarily because of budgetary limitations, but also because it can be challenging to find qualified candidates who speak the desired languages and meet other criteria required in the SNAP worker role.

Even when SNAP workers can provide appropriate language assistance services to individuals with LEP, staff noted that these participants may not fully understand SNAP processes and may feel anxious because of other factors, such as having arrived only recently in the United States. In addition to language access barriers, diverse cultural experiences and perspectives can make the SNAP application process more challenging for individuals with LEP.

#### *Outside resources available to LEP applicants and participants (Objective 2)*

In Washington, interpretation services are provided through the contracted telephonic interpretation service, contracted in-person interpreters, and what the State considers certified bilingual workers. Translation services are provided through a contracted service or certified bilingual workers. The qualifications of bilingual workers to communicate in a language other than English and to provide interpretation and translation services are assessed through a one-day oral and written examination administered by DSHS. Those who pass are considered certified.

Local agency staff are required to offer an interpreter as soon as they determine that someone is LEP. Staff provide an interpreter unless the individual with LEP explicitly waives their right to one. Staff identify individuals with LEP in several ways. The individual may (1) self-identify or point to their language on an "I Speak" poster, (2) display a message they typed and translated using an application such as Google Translate on their cell phone, (3) provide their EBT card or case information so the staff can look up their primary language in the case monitoring system, or (4) simply indicate they do not understand or fail to respond to a staff member's greeting.

In the call center, an individual with LEP identifies themselves as LEP by selecting their preferred language in the Interactive Voice Response system, tells staff in their own language or in English that they speak a different language, or provides their case information so the staff

can look up their primary language in the case monitoring system. Spanish- or Russian-speaking individuals with LEP are pulled into a separate queue to receive assistance from Spanish- or Russian-speaking bilingual call center staff. If the SNAP worker assisting the participant with LEP is not fluent in the participant's language, they are required to offer an interpreter unless the participant explicitly waives their right to one.



"We have had ... someone from the Ukrainian community, they can come in with an authorized representative. We have had those people come in and provide interpretation. If it's a certified person and they show credentials, we accept that."

—Washington local agency respondent

The State agency maintains relationships with various advocacy organizations and works with them to support groups of LEP immigrants and refugees. Although advocates help individuals with LEP build trust in the agency and understand SNAP processes, they typically do not provide interpretation services unless the advocate is assessed by the agency to be a qualified interpreter, such as by showing a credential indicating that they are a certified interpreter. If a SNAP participant arrives with a friend, family member, or advocate to interpret, local agencies usually insist on providing their own qualified interpretation services if the helper is not considered to be a qualified interpreter. Separate State or local government agencies do not provide interpretation or translation services for the local SNAP agencies. Additionally, counties and cities within the State do not provide these services for the local SNAP agencies.

Local agency staff track language access data within the regular case management system. Each SNAP participant's case record includes their primary written language and primary spoken language. Every time staff interact with the participant or provide translation of documents, they record the language assistance services provided. If a participant has LEP, an alert pops up within the case management system offering drop-down options that staff must select from, such as whether an interpreter service was used, which one was used (along with the interpreter's ID number), and whether the participant waived the offer of free interpretation services.

#### *Local agency staff perceptions about federal LEP policies, federal regulations, and statutes (Objective 3)*

Staff reported a clear understanding of Title VI of the Civil Rights Act of 1964, 7 CFR 15, the SNAP bilingual regulations, and USDA LEP Guidance, based on initial and ongoing trainings and staff audits. However, most did not know these statutes, regulations, or policies by name—except for Title VI of the Civil Rights Act, which is covered in their annual civil rights trainings.

The State agency provides appropriate communication to local agencies about language access through these civil rights trainings and in informational emails about process and policy updates. The procedure handbook, available to all staff, is also updated with any process or policy updates related to language access. Staff from local agencies can provide feedback to the State agency on language access issues through their office's language access coordinator; every local office has a designated staff person in this role. Local agency staff are also able to make recommendations—including any that concern language access processes—to a staff

process improvement committee that vets the feasibility of suggestions. Staff noted that trainings and communications provide a sufficient explanation of the language access procedures that they must follow and give them an opportunity to bring any issues or suggestions to the State agency's attention.

Staff requested some resources and changes to procedures that could help them better serve individuals with LEP, such as additional certified or otherwise qualified bilingual staff and interpreters for uncommon languages on the contracted telephonic interpretation service. Staff suggested that the telephonic interpretation service be audited to ensure interpreters are providing accurate interpretation. Although accurate interpretation is essential to ensuring that individuals with LEP can participate fully in SNAP, staff do not know whether an interpretation is accurate if they do not speak the language.

They also suggested that an easier, faster process for translating documents could limit some of the issues they see with timely benefit processing. Staff would also like more information and resources in advance of incoming refugee populations. For example, they would like FNS to provide translated documents and information about which groups are eligible for SNAP more rapidly—for example, in cases such as the Ukrainian refugee crisis.

One staff member who had been with the State agency for decades noted that the agency has improved language access services over time and believes that stems from the agency's focus on ensuring that English-language speakers and individuals with LEP have an equal opportunity to participate fully in SNAP.

*Language landscape in local agency catchment areas (Objective 4)*

In Washington, 13.4 percent of people ages 5 and older who live at or below 130 percent of the FPL are considered LEP. See Exhibit 7 for the DSHS local agencies included in this study.



"I've been here for 40 years. I started as an eligibility worker. When I first began, we did use kids and community members and there were some concerns about interpreters directing the conversation. Using contracted services with no investment in the outcome of the case probably helps us serve clients with more equity. It's baked into everything we do—diversity, equity, and inclusion is a super high priority for Washington State, so we want to ensure equitable treatment to everybody, regardless of language skills."

—Washington local agency respondent

**Exhibit 7.** Prevalence of LEP for selected local agencies in Washington

Local agency	Percentage of individuals in service area who have LEP <sup>a</sup>	Number of individuals with LEP in service area <sup>a</sup>	Most spoken languages among individuals with LEP, according to agency staff <sup>b</sup>
Local Agency 1	21	3,285	Spanish, Chinese, Ukrainian, Russian, Punjabi (language native to India and Pakistan), Dari (language native to Afghanistan)
Local Agency 2	7	1,242	Spanish, Ukrainian, Russian, Vietnamese, Korean, Micronesian
Local Agency 3	10	2,334	Spanish, Mixtec (language native to Mexico), Mam (Mayan dialect from Guatemala and Mexico), Q’anjob’al (Mayan dialect from Guatemala and Mexico)

Source: 2020 American Community Survey (percentage and number of individuals with LEP) and interviews with local agency staff (most common languages).

<sup>a</sup> Of people ages 5 and older who live at or below 130 percent of the FPL.

<sup>b</sup> The languages identified in this table may not reflect the most spoken languages of the SNAP-eligible population.

## Synthesis of findings across case study States

**Local agencies across the case study States face similar challenges when serving LEP applicants and participants.** Common challenges are the lack of translated documents; issues with the telephonic interpreter service, such as difficulty finding interpreters for less commonly spoken languages; and individuals with LEP not understanding SNAP processes because of cultural differences.

**Telephonic interpreter services are the main way local agencies provide language assistance services to individuals with LEP.** Staff report that these telephonic interpreter services work well most of the time for providing the necessary language assistance to individuals with LEP. At times, however, challenges arise with wait times, finding an interpreter for uncommon languages, and receiving accurate interpretation.

**Participants sometimes bring a family member or friend to provide interpretation; how agencies handle these unqualified interpreters differs by State.** Participants go into local agencies with family, friends, and community advocates to help interpret. This may be especially common among new immigrant groups. These helpers vary in their ability to provide interpretation and are usually considered unqualified. For this reason, some agencies offer the option of using a qualified interpreter, some insist on using a qualified interpreter, and some allow individuals with LEP to use their own helper as an interpreter. In Massachusetts, New Mexico, and North Carolina, individuals must be age 18 or older to interpret for a participant. There were reports of minors providing interpretation, but this occurred infrequently. Staff in all four States mentioned that family or friends who interpret should be adults. In Massachusetts, New Mexico, and North Carolina, staff shared they have a policy which states individuals must be 18 years or over to interpret for a participant. Staff in Massachusetts and

Washington reported instances where minors have provided interpretation, but this occurred infrequently.

**Language assistance services provided by SNAP staff vary across State and local agencies.** All States in these case studies have bilingual workers, though skills assessments and qualification procedures vary by State. Some local agencies in North Carolina also have qualified and certified in-house interpreters.

**In most States, staff said they understood federal LEP policies, federal regulations, and statutes through their trainings.** In Massachusetts, staff understood the importance of providing interpreters to individuals with LEP but did not report a clear understanding of official LEP statutes, regulations, and policies (for example, Title VI, 7 CFR 15, the SNAP bilingual regulations, and USDA LEP Guidance).

**The most common additional resources requested across States were documents translated into more languages.** They also requested additional bilingual staff and in-person interpreters and wanted to learn more about what other States are doing to provide language access.

States communicated with local agencies through email and/or Quick Guide or other similar online systems and reported that this arrangement generally worked well to disseminate important information related to language access. Some States, including Washington, had more extensive communication options by identifying a language access coordinator for each office to handle language access communications between local and State agency staff.

**The language landscape for local agencies varied significantly among States and even among local agencies within States.** Some local agencies the study team visited served an area with a larger proportion of individuals with LEP than the State average. Spanish was among the most common language in local agency areas across States. Other common languages varied. Haitian Creole has recently become one of the most common languages across the Massachusetts local agency areas included in this case study.

## Conclusions and Recommendations

Below are some conclusions and recommendations based on the findings in this report.

**SNAP staff at local agencies across States would benefit from trainings for new staff and refresher trainings for all staff to ensure consistent and meaningful access to SNAP for individuals with LEP who need qualified, competent language assistance services.** The trainings should cover the specific regulations and policies for serving individuals with LEP as well as the State's procedures for meeting those regulations and policies. This could include civil rights and language access policies; how to work with telephonic and in-person interpreters; how to respond to translation requests and work with translation services; limitations on the use of family, friends, and minor children as interpreters and translators; and appropriate use of machine translation software and other emerging technologies for translation and interpretation purposes. For States with existing trainings, staff could benefit from updated trainings that incorporate new content to make them more interactive and

engaging. States that do not have specific training for bilingual staff should consider implementing one to ensure that the roles and responsibilities of this position are clear and that all bilingual staff are using the same procedures to serve individuals with LEP.

**FNS might consider providing prompt support and additional resources to SNAP agencies suddenly serving large numbers of individuals with LEP who speak languages not commonly spoken in the State, such as newly arrived refugees.** People speaking languages not commonly spoken in a State who arrive in large numbers can be difficult to serve because bilingual staff and interpreters who speak these languages are limited, as are translated materials and information. It can take time for States to respond to new language assistance needs, but these individuals with LEP are in desperate need of SNAP benefits and other resources. States would benefit from funding and translated materials from FNS in these situations so that they have the resources needed to help. FNS could prioritize translating vital documents and informational materials into languages spoken by newly arriving LEP populations, for example. FNS could also identify best practices, resources, and procedures for providing language assistance services when bilingual staff and interpretation services for that language are scarce.

**Local agency SNAP staff could benefit from new technology to improve telephonic interpretation services for individuals with LEP while maintaining confidentiality throughout the process.** Using the telephonic interpretation service can be a long process if the State agency does not have sufficient equipment and staff members and individuals with LEP have to pass the phone back and forth or if the phone is located in the local agency's lobby. Technology such as headphone splitters or extra handsets could improve the process as well as confidentiality when communicating with individuals with LEP.

**Local SNAP agencies would benefit from hiring additional qualified in-house interpreters, especially for commonly spoken languages.** Respondents agreed that in-person interviews conducted by bilingual staff are quicker and less burdensome than interviews that require telephonic interpretation service. Although bilingual staff are helpful, they have responsibilities in addition to interpretation or speaking directly with individuals with LEP on behalf of an English-only worker. In-house interpreters focus solely on providing interpretation services to individuals with LEP. Respondents agree that hiring more in-house interpreters would alleviate the burden on bilingual staff with high caseloads. Depending upon the language, it may be difficult to find qualified interpreters in the area, however.

**FNS and State agencies might consider providing additional support for bilingual staff.** At times, States struggle to hire new or qualify existing bilingual staff. State agencies provide some incentives for bilingual local agency staff in the form of pay differentials. However, they might benefit from providing additional support for new hires or existing staff through expanded language qualification testing to obtain certifications, interpretation trainings, and higher pay. FNS could support these efforts by providing additional funding through reimbursements to State agencies for the cost of certifications, training, and higher pay. Additionally, once identified, State and local agencies could ensure quality controls are in place when contracting

for language assistance services by including interpretation and translation skills testing and qualification standards within their solicitations and contracts.

**Future research could include the experiences of individuals with LEP.** The study team's interviews with SNAP staff provided insights into the interactions between staff and clients. Conducting interviews with individuals with LEP and with community-based organizations that assist them about their experiences would provide a better understanding of what is and is not working well with the language assistance services being provided. Interviews with individuals with LEP would also be helpful for triangulating the case study results and providing robust recommendations related to language access services. Conducting additional case studies with more rural local agencies could also help FNS better understand how resources and challenges might vary based on location and urbanicity across the States.



## References

U.S. Department of Justice Civil Rights Division. (n.d.). *Title VI of the Civil Rights Act of 1964 42 U.S.C. § 2000D ET SEQ.*  
<https://www.justice.gov/crt/fcs/TitleVI-Overview>

## **Appendix A**

### **Research Questions**

**Research questions**

**Objective 1. Describe the challenges and problems that develop when serving LEP applicants and participants**

1. What is the process for serving a LEP applicant or participant that speaks a language for which the local office does not have a qualified interpreter?
2. On an individual basis, how do local SNAP offices determine whether someone is LEP?
3. How often does a local office respond to requests for documents or interviews in other languages?
4. What does the frontline worker do when there is no qualified interpreter available to interpret in the LEP participant's language?
5. How does the local office ensure all frontline staff are equipped with access to a telephonic language line or other source for qualified interpreters?
6. How are LEP participants negatively impacted if the local office cannot serve them due to language barriers?
7. Are LEP participants granted exemptions from any program requirements (e.g., required documentation, work requirements, mandatory E&T) in circumstances where translation or interpretation services cannot be provided?
8. How often does a local office respond to requests for documents or interviews in languages for which they do not have an interpreter or translated materials?
9. How are language services provided in unexpected situations (e.g., benefit issuance system outage, running out of translated materials, applicants that enter the office and cannot communicate due to LEP, or an office receives voicemail messages or documents in non-English languages)?
10. How does the local agency determine whether frontline staff at the SNAP agency and subrecipient and community-based providers are providing the appropriate language assistance services at the point of contact with applicants and participants with LEP?
11. Do new frontline staff and other staff receive training regarding Title VI and language access regulations and guidance?
12. How are front line staff and other staff informed of changes in language access policies, plans and procedures?
13. How do front line staff and other staff give feedback on challenges with the LEP policies?
14. If bilingual staff are used to interpret or to communicate in-person with LEP applicants and participants, who determines if they are qualified to do so? How is the decision made?
15. How do frontline staff record and track the language assistance services provided to LEP applicants and participants at the point of contact?
16. What other problems and challenges have developed working with LEP applicants/participants?
17. Is there a mechanism for applicants/participants to provide feedback or concerns to the State agency or local office regarding the LEP process?
18. Is there a difference in sanctioning procedures for LEP participants if their language abilities may be a factor?

**Objective 2: Describe the outside resources available to LEP applicants and participants**

1. Are qualified translation/interpretation services provided by separate agencies in the State or local government, or through subrecipients or community partners?
2. Do counties or cities provide translation/interpretation services?
3. Are there advocacy organizations that help provide translation/interpretation services? If so, are these qualified, competent interpreters and translators?

**Objective 3: Collect local office staff perceptions about Federal LEP policies and Federal regulations and statutes**

1. Do frontline workers and managers believe they understand Title VI, 7 CFR 15, the SNAP bilingual regulations, and USDA LEP Guidance?

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2. What kind of information and resources do frontline workers and managers want from their State agencies or FNS to properly apply the Federal language access regulations and guidance? Do frontline workers and managers believe they have the necessary resources to ensure LEP persons full access to SNAP services in accordance with Federal regulations and guidance?

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3. Does communication regarding language access occur between the individual local SNAP offices and respective State agency?

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4. Do frontline workers and managers believe they receive enough technical assistance and communications from either the State agency or FNS about Federal language access regulations and guidance?

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5. What types of communications are currently in place between frontline workers or managers and their State agencies for language access guidance or resources?

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6. What other feedback do frontline workers and managers have regarding language access?

**Objective 4: Describe the language landscape around the selected local offices**

1. What is the number and proportion of LEP individuals that are served by each area?

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2. How does the concentration of LEP individuals vary within each area?

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3. What are the commonly spoken languages among LEP individuals in each area?

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## **Appendix B**

### **Interview Protocols**

## SNAP Language Access Study

### SITE VISIT INTERVIEW PROTOCOL

OMB Control No: XXXX-XXXX

Expiration date: XX/XX/20XX

#### 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.*

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

*State office policy officials:*

Who employs these staff?

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?

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?
  - a. What has been your experience working with these organizations?

*State office policy officials:*

- b. 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?
  - c. 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.

**8. 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?

9. 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.*

10. 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].

11. 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?

12. 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?

13. 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?

14. 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?

15. 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:*

16. 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

17. 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?

18. 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?

19. 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?

20. 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?

21. 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?

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

*All respondents:*

23. 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

24. 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?

25. 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?

## **Appendix C**

### **Walk-Through Protocol**

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## SNAP Language Access Study SITE VISIT SIMULATION GUIDE

OMB Control No: XXXX-XXXX  
Expiration date: XX/XX/20XX

### 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.

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. For this simulation of LEP participants' experiences in SNAP, we are interested in understanding the processes and procedures LEP individuals would go through when applying for and participating in SNAP. We are also interested in how a LEP individual's experiences would differ if they used a language you commonly encounter in your office or an uncommon language.

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.

During the simulation, I will ask to see materials, observe processes, and speak with translators in [non-English language spoken by site visitor]. I will take notes over the course of the simulation and I may ask you for copies of documents and/or screenshots, as long as no personally identifiable information is visible. Personally identifiable information is information by which the identity of an individual can be determined by direct or indirect means. Examples of such information include the name or case number of a SNAP applicant or participant. 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.

I expect this simulation to take no more than two hours. Before we get started, 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 2 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. Pre-application steps

1. First, please walk me through what happens when a LEP individual who uses [language used by site visitor] comes into your office. What would take place before they filled out a SNAP application?

Probes:

- Is there a screening tool that people can use to assess whether they would be eligible for SNAP before applying?
  - Do people receive referrals from other community organizations? How common is this for LEP individuals? How does the referral process typically work?
  - Are there any pre-application steps that ask about language assistance needs? How is it determined that someone needs language assistance?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would these pre-application steps differ from what you described for someone who used [language used by site visitor]?

Probes:

- How would a LEP individual who used an uncommonly encountered language get any questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

B. Application

1. Please show me how a LEP individual would complete an application if they used [language used by site visitor].

Probes:

- Can LEP individuals apply in person? Online? By telephone? Show me how they would do so.
  - In what languages is a SNAP application available? *If application is not available in the language used by the site visitor:* Why is the application not available in [language]? What challenges might a LEP individual experience by not having an application available in their language?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would completing an application differ from what you described for someone who used [language used by site visitor]?

Probes:

- Can people who use an uncommonly encountered language apply in person? Online? By telephone?
- How would a LEP individual who used an uncommonly encountered language get their questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

### C. Application interview

1. How would someone using [language used by site visitor] complete the application interview?

Probes:

- Would the interview be completed in person? Over the phone?
  - Who would be involved in the interview (for example, a bilingual SNAP worker or an English-speaking SNAP worker and an interpreter from another organization)?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would completing the application interview differ from what you described for someone who used [language used by site visitor]?

Probes:

- Could the interview be completed in person? Over the phone?
- Who would be involved in the interview (for example, a bilingual SNAP worker or an English-speaking SNAP worker and an interpreter from another organization)?
- What would you do if there was no qualified interpreter available to interpret in the LEP individual's language?
- How would someone using an uncommonly encountered language get any questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

### D. Verification

1. How would a LEP individual who used [language used by site visitor] complete the process of verifying their household's income, identity, citizenship status, assets, expenses, and household size?

Probes:

- Please show me any forms the person would fill out. In what languages are the forms available? *If documents are not available in the language used by the site visitor: Why are these documents not available in [language]? What challenges might a LEP individual experience by not having these documents available in their language?*
  - What documents must be provided as part of the verification process (for example, pay stubs or benefit statements from Social Security or Unemployment Insurance)?
  - What types of assistance are available to help someone with LEP complete the verification process?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would completing the verification process differ from what you described for someone who used [language used by site visitor]?

Probes:

- How would a LEP individual complete required verification forms if they were not available in their language? What challenges might a LEP individual experience by not having these documents available in their language?
- How would someone using an uncommonly encountered language get their questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

#### E. Benefit issuance

1. What needs to happen for someone approved for SNAP to use their benefits? How does this work for a LEP individual who uses [language used by site visitor]?

Probes:

- How do SNAP participants receive their Electronic Benefit Transfer (EBT) cards?
- Are printed materials that accompany the card provided in languages other than English? If so, in which languages are they available? *If documents are not available in the language used by the site visitor: Why are these documents not available in [language]? What challenges might a LEP individual experience by not having these documents available in their language?*
- Once someone has been approved for SNAP, how long does it usually take for their card to arrive? Would this amount of time differ for a LEP individual, for example because printed materials that accompany the card are provided in another language?
- How is the card activated?
- Do SNAP participants need to call a telephone service line or create a PIN number? If so, is that service line available in other languages?

- What other steps, if any, would a SNAP recipient need to take to be able to use their benefits, and how would a LEP individual complete the steps?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would accessing SNAP benefits differ from what you described for someone who used [language used by site visitor]?

Probes:

- Would the amount of time it took to receive the card differ for someone who used an uncommonly encountered language, for example, because printed materials that accompany the card are provided in another language?
- Do SNAP participants need to call a telephone service line or create a PIN number? If so, is that service line available in uncommonly encountered languages?
- What other steps, if any, would a SNAP recipient need to take to be able to use their benefits, and how would someone using an uncommonly encountered language complete the steps?
- How would someone using an uncommonly encountered language get their questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

#### F. Reporting changes

1. Please describe the process someone who used [language used by site visitor] would follow to report changes in income, employment, household size, or other changes to their assets or expenses. The types of changes that must be reported differ depending on household characteristics. For the purposes of this simulation, let's assume the household is subject to simplified reporting. Under simplified reporting, the SNAP household must only report changes periodically or when income increases above a certain threshold.

Probes:

- Can changes be reported in person? Online? By telephone?
  - Please show me any documents that would be used in reporting changes. In what languages are these documents available? *If documents are not available in the language used by the site visitor:* Why are these documents not available in [language]? What challenges might a LEP individual experience by not having these documents available in their language?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
2. If a LEP individual used a language uncommonly encountered in your office, how would the process for reporting changes differ from what you described for someone who used [language used by site visitor]?

Probes:

- Could changes be reported in person? Online? By telephone?
- How would a LEP individual report changes if required forms were not available in their language? What challenges might a LEP individual experience by not having these documents available in their language?
- How would someone using an uncommonly encountered language get their questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

### G. Recertification

#### 1. How would someone who used [language used by site visitor] complete the recertification process?

Probes:

- Would the recertification interview be completed in person? Over the phone?
  - Who would be involved in the interview (for example, a bilingual SNAP worker or an English-speaking SNAP worker and an interpreter from another organization)?
  - Please show me the verification forms the individual would fill out. In what languages are the forms available? *If documents are not available in the language used by the site visitor:* Why are these documents not available in [language]? What challenges might a LEP individual experience by not having these documents available in their language?
  - What documents must be provided as part of the verification process for recertification (for example, pay stubs or benefit statements from Social Security or Unemployment Insurance)?
  - What types of assistance are available to help someone with LEP complete the verification process?
  - How would a LEP individual get their questions answered during this stage?
  - What challenges might a LEP individual experience at this stage?
- #### 2. If a LEP individual used a language uncommonly encountered in your office, how would the recertification process differ from what you described for someone who used [language used by site visitor]?

Probes:

- Could the recertification interview be completed in person? Over the phone?
- Who would be involved in the interview?
- What challenges could a LEP individual using an uncommonly encountered language experience during the recertification interview?

- How would a LEP individual complete required verification forms if they were not available in their language? What challenges might a LEP individual experience by not having these documents available in their language?
- What types of assistance would be available to help someone using an uncommonly encountered language complete the verification process?
- What would you do if there was no qualified interpreter available to interpret in the LEP individual's language?
- How would someone using an uncommonly encountered language get their questions answered during this stage?
- Are there any challenges someone using an uncommonly encountered language might experience at this stage?

#### H. Other language service activities

1. How do you document language services provided?
2. If a LEP individual has questions outside of any of the key steps we just discussed, how could they get their questions answered?
3. How would a LEP individual access additional services such as employment and training services or SNAP education?
4. What is the process for receiving a discrimination complaint from a LEP individual?

Probes:

- Do you provide them with a translated complaint form?
  - Do you receive the complaint orally using an interpreter?
5. After the discrimination complaint is received, how is it processed?
  6. Do you provide LEP individuals with a translated version of the appropriate USDA FNS nondiscrimination statement?

#### I. Additional challenges

1. Are there any other challenges LEP individuals encounter when applying for or participating in SNAP that we haven't discussed?
2. Are there any other challenges specific to LEP individuals who use languages uncommonly encountered in your office?
3. Are there any steps that could be taken to improve the application or participation process for LEP individuals?
4. Are there any additional resources that would help you serve LEP individuals?
5. Is there anything else you would like to show me or mention related to serving LEP individuals?

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