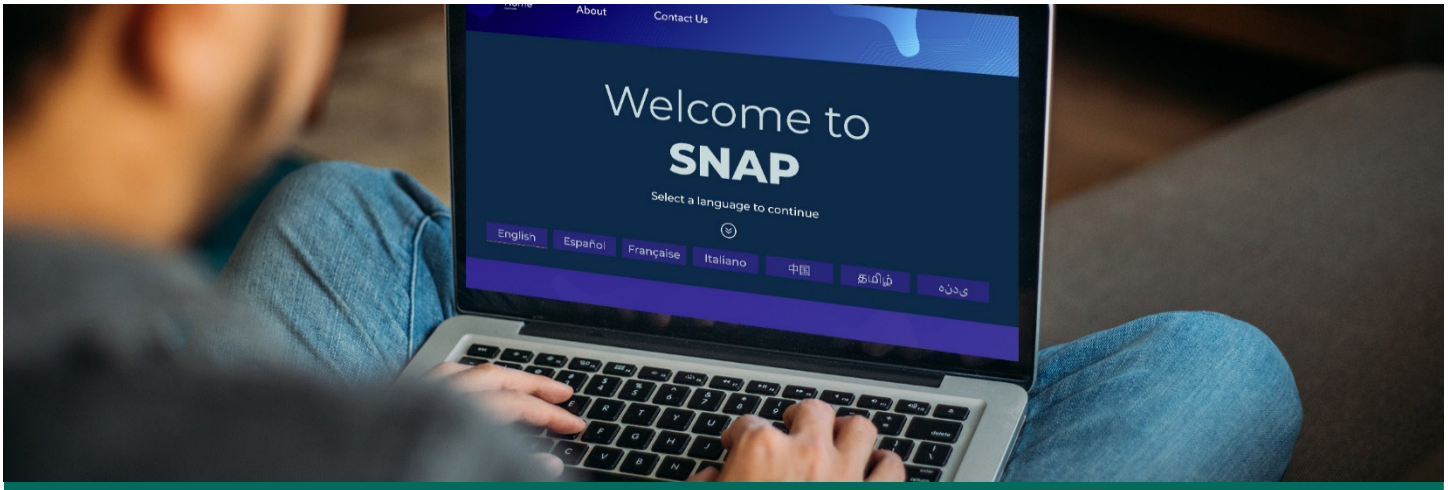


Supplemental Nutrition Assistance Program (SNAP) Language Access Study

Results from the SNAP Agency Survey

October 2024

Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Supplemental Nutrition Assistance Program (SNAP) Language Access Study

Results from the SNAP State Agency Survey

October 2024

Rachel Sutton-Heisey, Sarah White, Valentina Loaiza and Maria Boyle

Submitted to:

United States Department of Agriculture
Food and Nutrition Service
Office of Policy Support
1320 Braddock Place
Alexandria, VA 22314
Project Officer: Eric Williams
Contract Number: 47QRAA18D00BQ/12319821F0093

Submitted by:

Mathematica
1100 First Street, NE, 12th Floor
Washington, DC 20002-4221
Phone: (202) 484-9220
Fax: (202) 863-1763
Project Director: Maria Boyle

Suggested citation

Sutton-Heisey, R., White, S., Loaiza, V., & Boyle, M. (2024). Supplemental Nutrition Assistance Program (SNAP) Language Access Study: Results from the SNAP State agency survey. Prepared by Mathematica, Contract No. 47QRAA18D00BQ, Order No. 12319821F0093, Princeton, NJ: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Eric Sean Williams. Available online at: www.fns.usda.gov/research-and-analysis.

Disclaimer

This research was supported by the U.S. Department of Agriculture, Food and Nutrition Service. The study findings and conclusions in this publication are those of the author(s) and should not be construed as to represent any official USDA or U.S. Government determination or policy.

Acknowledgements

This study was conducted by Mathematica under contract with the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS). Many people assisted the authors in their efforts to design, collect, analyze, and report on the findings from this study. We thank all these individuals who provided important contributions to the study and to this report. A special thanks to Julie Hartnack and Brett Eiffes for drafting the survey, Dory Thrasher for helping with the language landscape analysis, Kevin Conway for reviewing the report, Bridget Gutierrez for editing the report, Sharon Clark for producing the report.

The authors wish to thank our FNS project officer, Dr. Eric Williams, for his thoughtful guidance and oversight over the course of the study. We are also grateful for the time and feedback provided by several other FNS staff members, including Gail Hoffman, Anita Singh, Mary Lee, and William Lowe.

Additionally, this study and report would not have been possible without the cooperation and support from States and Territories who participated in the survey and shared documents for this study. Their time and contributions made this research possible.

Contents

Definitions xv

Executive Summary xviii

I. Background on the SNAP Language Access Study 1

II. Overview of the SNAP State Agency Survey 2

Research objectives 2

Data collection and analysis approach 2

Language landscape 2

Web survey of State agencies 3

Document review 3

III. Key Findings on the Language Landscape Analysis 4

Other language assistance options 9

Phone line language assistance options 9

Website and EBT processor language assistance options 10

IV. Key Survey Findings 11

Federal civil rights regulations, policies, and guidance for language access 11

Language services offered by State agencies 14

Translation services offered by State agencies 14

Oral language assistance services (interpretation and direct, in-language communication) offered by State agencies 16

Other language assistance services offered by State agencies 17

SNAP language access procedures 19

Outreach to individuals with LEP 19

Notifying the public about the availability of free language assistance services 19

Identifying, recording, and tracking language assistance needs 20

Translating written information and materials for individuals with LEP 20

Providing interpretation services for individuals with LEP 20

Use of family, friends, and children for providing language assistance services 21

Challenges providing language assistance services 23

How States know that frontline staff are providing appropriate language assistance services 24

Hiring and evaluation practices for frontline staff providing languages services 25

Training for frontline staff on how to work with participants with LEP 25

Civil rights processes 26

SNAP E&T language access policies and services 29

D-SNAP language access policies and services 31

SNAP-Ed language access policies and services 33

State agency perceptions about Federal LEP policies 34

What do State agencies need most to ensure individuals with LEP have meaningful access to SNAP? 35

How do State agencies perceive FNS communications on language access requirements? 36

V. Key Findings from the Document Review 37

Language access plan 38

State agency guidance or policy documents related to language access 38

Informational materials on how the SNAP State agency implements language access policies and procedures 39

State agency guidance or policy documents related to submitting and/or addressing civil rights complaints 39

Informational materials provided to SNAP participants on submitting civil rights complaints 39

Training materials for frontline staff on language access obligations 39

VI. Conclusions and Recommendations 40

Appendix A Research Questions 42

Appendix B Additional Tables 49

Appendix C Study Methods 99

Appendix D Survey Instrument 105

Appendix E American Community Survey Limited English Proficiency Data Tables 183

Tables

I.1 Definitions xv

II.1 SNAP State Agency Survey research objectives 2

III.1 States with the highest number (> 1 million) of LEP individuals (ages 5 and older) 4

III.2 States with the highest percentage (>10%) of LEP individuals (ages 5 and older) 5

III.3 States with the lowest number (< 20,000) of LEP individuals (ages 5 and older) 5

III.4 States with the lowest percentage (< 2%) of LEP individuals (ages 5 and older) 5

III.5 Top languages, other than English, spoken by LEP individuals at or below 130% FPL (> 100,000 individuals) 6

III.6 States with the highest number of LEP individuals at or under 130% FPL (> 100,000 individuals) 7

III.7 States with the highest percent of LEP individuals at or under 130% FPL (> 14%) 7

III.8 States with the lowest number of LEP individuals at or under 130% FPL (10,000 or less) 8

III.9 States with the lowest percent of LEP individuals at or under 130% FPL (4% or less) 8

IV.1 Elements of SNAP State agency language access plans (LAP), for State agencies with plans 11

IV.2 SNAP State agencies that have conducted a four-factor analysis and have a LAP, by type of administration 12

IV.3 SNAP State agencies that have a Language Access Plan and that have ever conducted a four-factor analysis, by SNAP caseload size 12

IV.4 SNAP State agencies that have a language access coordinator and whether they are responsible for developing a language access plan 13

IV.5 SNAP State agencies that have a Language Access Working Group, by SNAP caseload size 13

IV.6 Range of languages used for vital documents in State agencies 15

IV.7 Methods SNAP State agencies use to determine the languages to translate vital documents to 15

IV.8 Reasons that SNAP State agencies translate vital documents for participants 16

IV.9 Languages other than Spanish offered for vital documents, recorded voice services, and multilingual online services 18

IV.10 How SNAP State agencies translate content, materials, or services that are provided online 19

IV.11 Frequency that SNAP State agencies use family, friends, and children as interpreters, by SNAP caseload size 22

IV.12 Problems and challenges that have developed working with LEP applicants/participants 24

IV.13 Qualifications that SNAP State agencies use to evaluate interpreters, translators, and bilingual staff during the hiring process 25

IV.14 SNAP State agencies providing other types (in addition to the civil rights training) of training on language access procedures to frontline staff, by type of SNAP administration 26

IV.15 Types of allegations raised in the civil rights complaints, related to language access services, received over the past 12 months (n=6) 28

IV.16 Ways in which SNAP E&T services offered in other languages differ from those offered in English 29

IV.17 State agencies that provide training to SNAP E&T providers about Title VI and their language access requirements 30

IV.18 How SNAP State agencies provide language assistance during D-SNAPs to applicants who apply in person, via telephone, or online 32

IV.19 Additional resources SNAP State agencies need to ensure individuals with LEP have meaningful access to SNAP 35

IV.20 SNAP State agency communication with FNS about language access requirements, by SNAP caseload size 36

V.1 Summary of number of documents received 37

V.2 Summary of documents that State agencies could and could not provide 38

Objective 1: Describe how each State agency makes decisions about addressing LEP regulations and policies and civil rights regulations and policies as related to LEP

1.1 Engagement of SNAP State agencies in language access policies 50

1.2 Elements of SNAP State agency language access plans, for State agencies with approved plans 50

1.3 Sources SNAP State agencies use to record and track how often they encounter LEP individuals 51

1.4 Types of oral language assistance services offered by States 51

1.5 Methods SNAP State agencies use to determine the languages that bilingual staff and interpreters need to speak in offices 52

1.6 State agency policies for frontline staff who encounter individuals with LEP who are proficient in a language not commonly used in the State 52

1.7 State agency provisions for languages that are mostly spoken instead of written 53

1.8 States that offer language assistance services due to a court decision, complaint, investigation, or compliance review 53

Objective 2: Describe the LEP policy landscape in each State

2.1 Types of vital documents translated by States 54

2.2 Methods SNAP State agencies use to determine the languages to translate vital documents to 54

2.3 Languages offered for vital documents, recorded voice services, and multilingual online services 55

2.4 How State agencies determine what mix of language services to provide 56

2.5 Reasons that SNAP State agencies translate vital documents for participants 56

2.6 Qualifications that SNAP State agencies use to evaluate interpreters, translators, and bilingual staff during the hiring process 57

2.7 Language assistance resources for applicants and participants to access online websites, portals, or applications 57

2.8 Requirements that SNAP State agencies incorporate into contracts and MOUs with sub-recipients 58

2.9 Methods that SNAP State agencies use to determine whether frontline staff are providing the appropriate language assistance services to LEP applicants and participants 58

2.10 How SNAP State agencies translate content, materials, or services that are provided online 59

2.11 How SNAP State agencies ensure translation accuracy and cultural competency 59

2.12 States that use multiple translations for languages with regional variation 60

2.13 Methods that SNAP State agencies use to provide language services in unexpected situations 60

2.14 SNAP State agencies that require individuals to sign a waiver of their right to free interpreter services when they use a family member or friend as an interpreter 61

2.15 SNAP State agency use of family, friends, and minor children as interpreters 61

2.16 Frequency that frontline staff use family, friends, and children as interpreters 61

2.17 How SNAP State agencies record the primary language spoken and/or the language assistance provided at the point of contact with LEP individuals 62

2.18 Methods of community feedback on language access policies, plans, and procedures 62

Objective 3: Describe the LEP operations landscape in each State

3.1 Methods that frontline staff use to communicate verbally with LEP individuals 63

3.2 How SNAP State agency staff and frontline staff conduct outreach to LEP communities about SNAP services 63

3.3 Length of time to get translated documents and interpreters for applicants and participants 64

3.4 Methods that States use to determine whether frontline staff are providing the appropriate language assistance services to LEP applicants and participants 64

3.5 How frontline staff are notified of an existing customer's needs for written or verbal language assistance services 65

3.6 States with a written procedure for how frontline staff determine whether an applicant or participant requires language assistance 65

3.7 Frequency that State or local agencies respond to requests for documents or interviews in languages they do not routinely encounter 65

3.8 State agency procedures when frontline workers are unable to communicate with the participant in their language 66

3.9 Problems and challenges in working with LEP applicants and participants 66

3.10 How SNAP State agencies evaluate the qualifications of an advocacy organization's translators and interpreters 67

3.11 SNAP State agencies that allow exemptions for individuals with LEP if there are no frontline staff proficient in their primary language 67

3.12 How LEP participants can share their feedback or concerns about the agency's language assistance services or lack thereof with SNAP State agencies 68

Objective 4: Describe how State agencies (frontline staff and other service providers) are trained to work with LEP participants

4.1 SNAP State agencies that provide frontline staff with an annual training on civil rights and/or other types of training on language access procedures 69

4.2 How SNAP State agencies inform frontline staff of changes in language access policies, plans, and procedures 69

4.3 How staff give feedback on challenges with implementing language access policies, plans, and procedures 70

4.4 How State agencies train SNAP, SNAP-Ed, and D-SNAP staff on language access policies, plans, and procedures 71

4.5 Frontline staff training on how to arrange telephone, web-based or video, and in-person interpretation services 72

4.6 Trainings that SNAP State agencies provide for bilingual staff or staff who provide interpretation services or translations 72

4.7 Processes for States to prioritize hiring caseworkers and other frontline staff who speak languages other than English 72

4.8 How SNAP State agencies inform SNAP E&T providers and SNAP-Ed contractors of Title VI and their language access requirements 73

4.9 SNAP State agencies that provide training to SNAP E&T providers about Title VI and their language access requirements 74

4.10 SNAP State agencies that require SNAP-Ed contractors to provide translated materials and qualified interpreters to LEP individuals 74

4.11 States with SNAP-Ed contractors that offer SNAP-Ed documents in a language other than English 74

Objective 5: Describe how SNAP State agencies implement the language access requirements within the Federal-State Agreement during the pre-award and post-award processes to ensure meaningful

5.1 SNAP State agencies that have a language access coordinator and whether they are responsible for developing a language access plan 75

Objective 6: Describe the E&T landscape for LEP participants in each State

6.1 SNAP State agencies or SNAP E&T providers that offer ESL classes as an E&T component 76

6.2 State or provider partnerships for ESL classes as an E&T component 76

6.3 SNAP E&T providers that offer services in a language other than English 76

6.4 How State agencies determine what languages to provide SNAP E&T services in 77

6.5 How SNAP E&T services offered in other languages differ from those offered in English 77

6.6 How staff conduct outreach to LEP communities about SNAP E&T services 78

6.7 SNAP State agencies that mandate SNAP E&T participation and their exemption policies 79

6.8 How SNAP State agencies or SNAP E&T providers identify individuals with LEP 79

6.9 How SNAP State agencies or SNAP E&T providers place individuals with LEP in an appropriate component 80

6.10 SNAP State agencies that use good cause to protect individuals with LEP from adverse action if they cannot participate in programs because of language barriers 80

6.11 How SNAP State agencies or SNAP E&T providers accommodate individuals with LEP who need to be placed in a SNAP E&T component 81

Objective 7: Describe how LEP policies function under D-SNAP in each State

7.1 SNAP State agencies that used D-SNAP less than two years ago, two to five years ago, and more than five years ago 82

7.2 SNAP State agencies offer in-person, telephone, or online D-SNAP applications 82

7.3 How SNAP State agencies provide language assistance during D-SNAPs to applicants who apply in person, via telephone, or online 83

7.4 States that offer D-SNAP documents in languages other than English 83

7.5 How State agencies decide which languages to translate D-SNAP materials into 84

7.6 SNAP State agencies with necessary agreements, contracts, and MOUs to onboard qualified interpreters when needed for D-SNAP 84

7.7 How SNAP State agencies decide for which languages to reserve qualified interpreters 85

7.8 Strategies SNAP State agencies use when language services are unavailable in the language of the individual with LEP 85

7.9 How SNAP State agencies decide which languages D-SNAP outreach should be in 86

Objective 8: Describe how civil rights complaints are addressed

8.1 How SNAP State agencies inform people they can file complaints about language access services directly with the USDA 87

8.2 SNAP State agencies with an FNS Civil Rights Division–approved process for handling civil rights complaints related to language access and national origin discrimination and number of findings of noncompliance 88

8.3 SNAP State agencies that received any civil rights complaints in the past 12 months about language access 89

8.4 Types of allegations raised in civil rights complaints that States received over the past 12 months 89

8.5 SNAP State agency informing FNS Civil Rights Division of civil rights complaints on language access before initiating allegation investigation 90

Objective 9: Collect State agency perceptions about Federal LEP policies, Federal regulations, and statutes

9.1 Whether SNAP State agency staff understand Title VI and Federal language access regulations and guidance 91

9.2 Additional information about Title VI and the Federal language access regulations and guidance that FNS could provide to SNAP State agencies 91

9.3 Whether SNAP State agencies have the resources to implement language access plans, policies, and procedures to meet Federal and State regulations and guidance 92

9.4 Additional resources SNAP State agencies need to ensure individuals with LEP have meaningful access to SNAP 92

9.5 Whether SNAP State agencies receive enough technical assistance and communications from FNS on language access requirements 93

9.6 SNAP State agencies that share language assistance resources with SNAP agencies in other States or other agencies within the State 93

9.7 Whether SNAP State agencies communicate about language access requirements and resources 93

Breakouts by SNAP caseload size and SNAP administration type

10.1 SNAP State agencies that have conducted a four-factor analysis, by type of SNAP administration 94

10.2 SNAP State agencies that have conducted a four-factor analysis, by SNAP caseload size 94

10.3 SNAP State agencies with a language access plan, by type of SNAP administration 94

10.4 SNAP State agencies with a language access plan, by SNAP caseload size 95

10.5 SNAP State agencies with a language access coordinator who develops the language access plan, by type of administration 95

10.6 SNAP State agencies with a language access coordinator who develops a language access plan, by SNAP caseload size 95

10.7 SNAP State agencies with a language access working group, by type of administration 96

10.8 SNAP State agencies with a language access working group, by SNAP caseload size 96

10.9 SNAP State agencies that permit the use of children as interpreters, by SNAP caseload size 96

10.10 Frequency that SNAP State agencies use family, friends, and children as interpreters, by SNAP caseload size 97

10.11 SNAP State agency communication with FNS about language access requirements, by SNAP caseload size 97

10.12 SNAP State agency perspectives on FNS technical assistance for language access requirements, by SNAP caseload size 98

10.13 SNAP State agencies providing other types of training on language access procedures to frontline staff, by type of administration 98

Figures

III.1 Example of a tagline link 10

IV.1 Types of vital documents translated by SNAP State agencies (n=49) 14

IV.2 Oral language services offered by SNAP State agencies (n=49) 17

IV.3 Methods frontline staff use to communicate verbally with individuals with LEP (n=49) 21

IV.4 Frequency in which SNAP State agencies frontline staff use family, friends, and children as interpreters (n=49) 22

IV.5 Use of family, friends, and children as interpreters (n=49) 23

IV.6 Training for frontline staff on how to use or arrange for different types of interpreter services (n = 49) 26

IV.7 State agencies requiring SNAP E&T providers to provide translated materials and qualified interpreters (n = 49) 30

IV.8 Types of D-SNAP applications that SNAP State agencies offer (n = 23) 31

IV.9 Ways in which State agencies train SNAP-Ed contractors on Title VI and language access requirements (n=47) 33

IV.10 State agencies' understanding about Title VI and the Federal language access regulations and guidance (n=49) 34

Definitions

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

Table I.1. Definitions

Term	Definition
Bilingual services	Bilingual services involve providing staff who can converse fluently with individuals with LEP in their primary language.
County-administered SNAP programs	There are two different ways that SNAP can be administered – at the State level or within States at the county-level. In county-administered SNAP programs each county's SNAP department is responsible for determining SNAP eligibility and authorizing SNAP benefits. There are 10 States that have their counties administer SNAP: California, Colorado, Minnesota, North Carolina, North Dakota, New Jersey, New York, Ohio, Virginia, and Wisconsin.
Disaster SNAP (D-SNAP)	The Disaster Supplemental Nutrition Assistance Program (D-SNAP) gives food assistance to households with low incomes with food loss or damage caused by a natural disaster.
Federal Executive Order 13166. "Improving Access to Services for Persons with Limited English Proficiency," (August 11, 2000, and reprinted in 65 FR 50121, 50122)	This Executive Order requires Federal agencies to examine the services they provide, identify any need for services for individuals with LEP, and develop and implement a system for providing language assistance to those people. The executive order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.
Food and Nutrition Act of 2008 (as amended)	This Act prohibits discrimination on the basis of race, color, national origin, age, sex, disability, religious creed, and political beliefs.
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.

Term	Definition
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.
Language access working group	A group that is responsible for identifying barriers to meaningful language access and developing and implementing strategies and solutions to overcome these barriers.
Language access coordinator	The language access coordinator coordinates and monitors the implementation of the State agency's language access plan, policies, and procedures.
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 limited English proficient 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.
Qualified interpreter	An in-house or contracted interpreter who has been professionally trained or demonstrated competence to interpret through court certification, the State Department, or comparable testing and is authorized to do so by contract with the Department or 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 contract with the Department or 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.
SNAP employment and training supports (SNAP E&T)	The SNAP E&T program helps SNAP participants gain skills and find work that moves them forward to self-sufficiency. Through SNAP E&T, SNAP participants have access to training and support services to help them enter or move up in the workforce. These programs also help to reduce barriers to work by providing supportive services – such as transportation and childcare reimbursements – as participants prepare for and obtain employment. Each State is required to operate a SNAP E&T program and receives Federal funding annually to operate and administer the program.

Term	Definition
SNAP E&T providers	SNAP E&T providers are organizations or agencies who provide SNAP E&T services and components to eligible SNAP participants. SNAP E&T providers could be SNAP State agency staff or subrecipient organization or agency staff (such as a Department of Labor or Community College).
Subrecipients	A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. An individual that is a beneficiary of such program is not considered a subrecipient.
State-administered SNAP programs	There are two different ways that SNAP can be administered – from the State level or from the county-level. In State-administered SNAP programs the State is responsible for determining eligibility and authorizing SNAP benefits. Forty-three States and territories administered SNAP from the State-level.
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.

LEP = limited English proficiency; SNAP = Supplemental Nutrition Assistance Program; USDA = U.S. Department of Agriculture.

Executive Summary

Introduction

The Supplemental Nutrition Assistance Program (SNAP) is an essential component of the nation's domestic safety net. SNAP provides a monthly benefit to eligible households to spend on food, which helps those with low incomes access nutritious foods and lead healthier lives. The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) administers SNAP in partnership with 53 State agencies—in the 50 States, the District of Columbia (DC), Guam, and the U.S. Virgin Islands (USVI).

State agencies that receive Federal financial assistance to administer SNAP are required to comply with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations for the USDA (at 7 CFR 15) (U.S. Department of Justice Civil Rights Division n.d.). Thus, SNAP agencies must have policies and procedures in place to ensure that vital information and materials such as applications, recipient notices, and information on digital platforms are available in languages that individuals with limited English proficiency (LEP) can understand. Additionally, agencies must ensure that program staff are trained on procedures, including the use of qualified interpreters, to provide meaningful access to program information for individuals with LEP. These requirements extend to nutrition education (SNAP-Ed), employment and training supports (SNAP E&T), SNAP outreach and disaster assistance SNAP (D-SNAP).

Despite these requirements, there is very little existing research on how SNAP State agencies are implementing these requirements and providing language access services to individuals with LEP. The purpose of this study was to help fill this knowledge gap and understand the steps State agencies take to ensure that individuals with LEP have meaningful access to SNAP, determine whether State agencies understand existing guidance on the language access requirements, understand State agencies' perceptions of the resources available to properly implement LEP plans, policies, and procedures to meet Federal regulations and guidance, and finally understand how language access policies, plans, procedures, and operations function at the local level.

Data collection and analysis approach

To address the study's purpose, the study team used three data sources: (1) a web survey of all 53 SNAP State agencies, (2) documents related to SNAP language access that State agencies provided, and (3) the American Community Survey (ACS) and decennial census data for the language landscape analysis. The sample for all three data sources included the 53 SNAP State agencies.

Language landscape

The study team used the ACS and decennial census data for the 50 States and DC to quantitatively analyze the extent of the variation in LEP concentration and common languages spoken within a State and across counties within each State. The ACS is not available for USVI and Guam, therefore, the study team used the language data from the most recently available Decennial Census of Population and Housing reports to calculate the number and proportion of individuals with LEP.[1] For USVI, the study team also calculated the top languages spoken at home among individuals with LEP.

Web survey of State agencies

The survey of State agencies was fielded from July 2023 to November 2023; 49 of the 53 State agencies responded to the web survey. The study team analyzed State data primarily by using quantitative methods to describe the language access policy and operations landscapes as well as other topics related to language access across the responding State agencies. The study team calculated basic summary statistics to describe the policy landscape and operations across the country.

In addition to summarizing responses to survey items across all State agencies, the study team analyzed those agencies by two key SNAP-related characteristics: (1) SNAP caseload size and (2) SNAP administration type. Together, these characteristics better describe how State agency language access policies and practices vary across the country. They may also clarify for FNS which types of States agencies may need more assistance in providing language services to SNAP applicants and participants.

Document review

The study team requested several documents related to language access from each of the 49 State agencies that responded to the survey. These included the language access plan (LAP), State guidance or policy documents related to language access, informational materials on how the State agency operates language access policies and procedures, State guidance or policy documents on submitting and/or addressing civil rights complaints, informational materials

[1] To use the ACS data for this analysis, we included the ACS categories of those speaking English well, not well, or not at all as LEP. Only those that spoke English very well were excluded from being in the LEP category. This approach is the standard way of defining "LEP" using the ACS data, as per the LEP.gov website hosted by the US Department of Justice, https://www.lep.gov/source-and-methodology

provided to SNAP participants on submitting civil rights complaints, and training materials for frontline staff on language access obligations. The study team used the web survey to ask States what type of documentation they could provide us. Then, the study team either sent emails to State agencies requesting their documentation or downloaded information from their websites.

Key study findings and lessons learned

- **State agencies with medium caseloads seem to have the greatest need for support in conducting a four-factor analysis[2] or creating a Language Access Plan.**
- **Twenty-seven State agencies have a Language Access Coordinator. Of those State agencies with Language Access Coordinators, 22 State agencies use them to develop their Language Access Plans.**
- **The most common way that State agencies notify the public of free language assistance services is by posting signs in intake areas and other entry points.**
- **One of the most useful ways that State agencies could be supported is through examples of best practices in how other SNAP agencies implement policies and procedures that ensure meaningful access for individuals with LEP in accordance with Federal regulations, policy, and guidance.**
- **More State agencies share language assistance resources with other agencies within their State (23 out of 49) rather than sharing with SNAP agencies in other States (7 out of 49).** Many State agencies (22 out of 49) said that they do not share language assistance resources within their State or with other States. Sharing examples of documents, tools, training, and so on may be a useful way to improve language access for SNAP participants and applicants.
- **To ensure that individuals with LEP have meaningful access to SNAP, State agencies reported that they would also need increased funding and staffing, translated materials, and support for agency staff training.**
- **State agencies rely heavily on interpretation services, especially contracted services, to communicate with SNAP participants and applicants in the languages that they need to receive services.**
- **Most State agencies do not allow any sort of exemption to individuals with LEP from work or other SNAP requirements.** However, of the State agencies that do not allow exemptions, 41 out of 42 State agencies (98 percent) said that their staff have access to a telephonic

[2] 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.

interpreter service. It is likely that staff use the telephonic interpreter service in the situations where frontline staff cannot provide services in an individual's language.

- **Training on language access policies and procedures varies across State agencies and subrecipients**. Almost all States provide annual civil rights training, but there is inconsistency when it comes to training on language access procedures to frontline staff. For example:
    - Twenty-two out of 49 (45 percent) of **SNAP E&T providers** said that their SNAP agency provides training and 18 out of 49 (37 percent) said that their policy or guidance gives local SNAP offices or E&T providers flexibility in how their staff are trained about Title VI and their language access requirements.
    - Only one out of the 24 State agencies who needed to use a D-SNAP in the last 5 years said that their agency does **not** provide any training to **D-SNAP providers** on their language access policy, plans, and procedures.
    - Twelve out of 47 State agencies (26 percent) do not provide training to **SNAP-Ed contractors** on Title VI and language access requirements.
- **State agencies still use family, friends, and sometimes children as interpreters**. Mostly this is done during emergencies, especially in the case of when children are used as interpreters. State agencies do use family and friends occasionally at other points in the application process. Increasing the training and resources for staff in these State agencies may help reduce the use of family, friends, and children. There was some variation depending on State caseload size on use of family, friends, and children as interpreters. States with small caseloads were more likely than States with medium and large caseloads to "sometimes" or "usually" use family and friends as interpreters. States with medium caseloads were a little more likely to use children as interpreters. Fifty percent of States with medium SNAP caseloads said that they never use children as interpreters, compared with 73 percent of State agencies with small caseloads and 67 percent of States with large caseloads.

I. Background on the SNAP Language Access Study

The Supplemental Nutrition Assistance Program (SNAP) is an essential component of the nation's domestic safety net. SNAP provides a monthly benefit to eligible households to spend on food, which helps those with low incomes access nutritious foods and lead healthier lives. The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) administers SNAP in partnership with 53 State agencies—in the 50 States, the District of Columbia (DC), Guam, and the U.S. Virgin Islands (USVI).

As a Federally assisted program, SNAP is required to comply with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations for the USDA (at 7 CFR 15) (U.S. Department of Justice Civil Rights Division n.d.). Thus, SNAP agencies must have policies and procedures in place to ensure that vital information and materials such as applications, recipient notices, and information on digital platforms are available in languages that individuals with limited English proficiency (LEP) can understand. Additionally, agencies must ensure that program staff are trained on procedures, including the use of qualified interpreters, to provide meaningful access to program information for individuals with LEP. These requirements extend to nutrition education (SNAP-Ed), employment and training supports (SNAP E&T), SNAP outreach and disaster assistance SNAP (D-SNAP).

FNS contracted with Mathematica to conduct the SNAP Language Access Study and provide a comprehensive understanding of the language, language access policy, and operations landscapes that SNAP States agencies and their subrecipients operate in. The study team gathered detailed data from SNAP State agencies as follows:

1. All 53 SNAP State agencies were invited to participate in a survey and submit documents for review (the SNAP State Agency Survey).
2. Four States—Massachusetts, New Mexico, North Carolina, and Washington—participated in case studies (study findings presented in a separate report).

This report presents findings from the SNAP State Agency Survey, which has the following goals:

- Understand the steps State agencies take to ensure that individuals with LEP have meaningful access to SNAP.
- Determine whether State agencies understand the existing guidance on the language access requirement.
- Understand State agencies' perceptions of the resources available to properly implement LEP plans, policies, and procedures to meet Federal regulations and guidance.
- Understand how language access policies, plans, procedures, and operations function at the local level.

Chapter 2 provides an overview of the SNAP State Agency Survey study, including a description of the research objectives and study methodology. Chapters 3 through 5 summarize the key study findings of the language landscape analysis, survey, and document review. Chapter 6 closes the report with a summary of the study's major findings and recommendations.

II. Overview of the SNAP State Agency Survey

Research objectives

The study had nine research objectives for the SNAP State Agency Survey (Table II.1). Within each of these objectives, the study had multiple research questions (see appendix A for a list of the research questions).

Table II.1. SNAP State Agency Survey research objectives

Objective
1. To describe how each State agency makes decisions about language access regulations and policies and civil rights regulations and policies as related to individuals with LEP.
2. To describe the language access policy landscape in each State.
3. To describe the language access operations landscape in each State.
4. To describe how State agencies (frontline staff and other service providers) are trained to work with participants with LEP.
5. To describe how the SNAP State agencies implement the language access requirements within the Federal-State Agreement during the pre- and post-award processes to ensure meaningful access to SNAP, SNAP-Ed, SNAP E&T, and D-SNAP for individuals with LEP.
6. To describe the SNAP E&T landscape for participants with LEP in each State.
7. To describe how LEP policies function under D-SNAP in each State.
8. To describe how the State agency implements the corrective actions necessary to resolve findings and areas of concern in FNS Civil Rights compliance reviews, complaint investigations, and FNS Management Evaluations.
9. To collect State agency perceptions about Federal LEP policies, federal regulations, and statutes.

D-SNAP = Disaster SNAP; E&T = employment and training; Ed= education; FNS = Food and Nutrition Service; LEP = limited English proficiency; SNAP = Supplemental Nutrition Assistance Program.

Data collection and analysis approach

To address the SNAP State Agency Survey study objectives, the study team used three data sources: (1) a web survey of SNAP State agencies, (2) documents related to SNAP language access that State agencies provided, and (3) the American Community Survey (ACS) and census data for the language landscape analysis. The sample for all three data sources included the 53 SNAP State agencies.

Language landscape

The study team used the ACS and decennial census data for the 50 States and DC to quantitatively analyze the extent of the variation in LEP concentration and common languages spoken within a State and across counties within each State. The ACS is not available for USVI and Guam, therefore, the study team used the language data from the most recently available Decennial Census of Population and Housing reports to calculate the number and proportion of

individuals with LEP.[3] For USVI, the study team also calculated the top languages spoken at home among individuals with LEP.

Web survey of State agencies

The survey of State agencies was fielded from July 2023 to November 2023 and 49 of the 53 State agencies responded to the web survey. The study team analyzed State data primarily by using quantitative methods to describe the language access policy and operations landscapes as well as other topics related to language access across the responding State agencies. The study team calculated basic summary statistics to describe the policy landscape and operations across the country.

In addition to summarizing responses to survey items across responding State agencies, the study team analyzed those agencies by two key SNAP-related characteristics: (1) SNAP caseload size and (2) SNAP administration type. Together, these characteristics better describe how State agency language access policies and practices vary across the country. They may also clarify for FNS which types of States agencies may need more assistance in providing language services to SNAP applicants and participants.

Document review

The study team requested several documents related to language access from each of the 49 State agencies that responded to the survey. These included the language access plan (LAP), State guidance or policy documents related to language access, informational materials on how the State agency operates language access policies and procedures, State guidance or policy documents on submitting and/or addressing civil rights complaints, informational materials provided to SNAP participants on submitting civil rights complaints, and training materials for frontline staff on language access obligations. The study team used the web survey to ask States what type of documentation they could provide us. Then, the study team either sent emails to State agencies requesting their documentation or downloaded information from their websites.

[3] The ACS data did not have the exact same definition of LEP as this study. To use the ACS data for this analysis, we included the ACS categories of those speaking English well, not well, or not at all as LEP. Only those that spoke English very well were excluded from being in the LEP category.

III. Key Findings on the Language Landscape Analysis

To better understand the population of individuals with both limited English proficiency and eligible for SNAP or NAP participation in the United States and Territories, the study team conducted an analysis of language data from several sources:

- For the 50 States, and DC: The American Community Survey, 5-year estimates Vintage 2020, accessed through data.census.gov/mdat.
- For Guam, and the US Virgin Islands: Decennial Census of Island Areas, 2020. Table DP2. Available through census.data.gov

Additional detail on methods used to analyze this data can be found in Appendix C which describes the methods for the language landscape analysis. Because the number of LEP individuals in each State was not part of the available data sources, the study team created the universe of LEP individuals in each State or Territory. From the data sources mentioned above (American Community Survey (ACS) and the Decennial Census of Island Areas (DCIA)) the study team included as LEP those individuals who spoke English well, not well, or not at all. Those who spoke English "very well" were excluded from being in the LEP category.[4]

The tables below show those States with the highest number and percentage of LEP individuals and those States with lowest number and percentage of LEP individuals based on our analysis using the ACS and DCIA data. For the most part, States with the highest number and highest percentage of LEP individuals are included in both tables, but several States are not – Hawaii, Nevada and Illinois. Hawaii and Nevada both have a high percentage of LEP individuals compared to their overall States' population, but the actual number of LEP individuals in these two States is each less than 1 million people. Similarly, Illinois has over 1 million LEP individuals, but this number is less than 10% of the State's overall population.

Table III.1. States with the highest number (> 1 million) of LEP individuals (ages 5 and older)

State/Territory	Overall Population	Number of LEP individuals
California	36,941,766	6,488,420
Texas	26,639,335	3,586,177
New York	18,376,459	2,425,152
Florida	20,084,426	2,389,671
New Jersey	8,367,289	1,016,574
Illinois	11,962,121	1,010,859

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

[4] This approach is the standard way of defining "LEP" using the ACS data, as per the LEP.gov website hosted by the US Department of Justice, https://www.lep.gov/source-and-methodology

Table III.2. States with the highest percentage (>10%) of LEP individuals (ages 5 and older)

State/Territory	Percent of LEP individuals
California	17.6%
Texas	13.5%
New York	13.2%
New Jersey	12.1%
Florida	11.9%
Hawaii	11.5%
Nevada	11.3%

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

Table III.3. States with the lowest number (< 20,000) of LEP individuals (ages 5 and older)

State/Territory	Overall State Pop	LEP individuals
Maine	1,277,189	18,328
South Dakota	819,740	17,679
North Dakota	706,912	13,184
West Virginia	1,712,054	12,720
Wyoming	546,138	9,958
Montana	1,000,334	9,671
Vermont	595,164	7,568

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

Table III.4. States with the lowest percentage (< 2%) of LEP individuals (ages 5 and older)

State/Territory	Percent of LEP individuals
North Dakota	1.9%
Wyoming	1.8%
Mississippi	1.6%
Maine	1.4%
Vermont	1.3%
Montana	1.0%
West Virginia	0.7%

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

To determine the numbers of LEP individuals eligible for SNAP, the study team combined the number of LEP individuals in each State with individuals ages 5 and older who were at or under 130% of the Federal Poverty Line (FPL).

Using this analysis, the study team found that the top languages spoken in the United States, other than English, by LEP individuals at or below 130% FPL are Spanish, Chinese, Arabic,

Vietnamese, Korean, and Russian, as shown in Table III.5 below. The full list of languages by State is found in the spreadsheet included in Appendix E.

Table III.5. Top languages, other than English, spoken by LEP individuals at or below 130% FPL (> 100,000 individuals)

Language	LEP individuals
Spanish	**4,981,011**
Chinese (Chinese, Mandarin, and Cantonese)	457,870
Arabic	204,505
Vietnamese	184,611
Korean	112,980
Russian	109,345

Similar to the analysis described above for LEP individuals only, the study team assessed which States had the highest number (Table III.6) and percent of LEP individuals (ages 5 and older) (TableIII.7) and which States had the lowest number and percent of LEP individuals (ages 5 and older) (Tables III.8 and III.9), both combined with being at or under 130% of the Federal Poverty Level (FPL).

For the most part States with the highest number and highest percentage of LEP individuals at or under 130% FPL overlapped, however, a number of States -, Pennsylvania, Georgia, North Carolina, Nevada, Washington, Rhode Island, Hawaii -, are not included in both tables. Pennsylvania, Georgia, North Carolina, and Washington all have more than 100,000 LEP individuals in their States with incomes at or under 130%, however, these individuals make up less than 14% of each State's population. For Rhode Island and Hawaii, low income LEP individuals make up more than 16% of the total population in each of these States, however, the actual number of LEP individuals with low incomes is less than 100,000 in each of these States.

Table III.6. States with the highest number of LEP individuals at or under 130% FPL (> 100,000 individuals)

State/Territory	LEP individuals at or under 130% FPL
California	1,725,832
Texas	1,170,691
New York	745,416
Florida	695,461
New Jersey	241,194
Illinois	239,702
Arizona	179,731
Massachusetts	170,585
Pennsylvania	170,054
Georgia	162,068
North Carolina	146,916
Washington	129,939

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

Table III.7. States with the highest percent of LEP individuals at or under 130% FPL (> 14%)

State/Territory	Percent of LEP individuals at or under 130% FPL
California	27.1%
New York	23.0%
Texas	22.9%
New Jersey	22.6%
Massachusetts	20.1%
Florida	18.8%
Connecticut	16.8%
Rhode Island	16.7%
Hawaii	16.6%
Nevada	16.1%
Arizona	14.3%

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

For the most part States with the lowest number and lowest percentage of LEP individuals at or under 130% FPL overlapped, but a number of States -, New Hampshire, Alaska, Louisiana, Alabama, Kentucky, Missouri -, were not included in both tables. New Hampshire and Alaska have less than 10,000 SNAP eligible LEP individuals but these individuals make up greater than four percent of the population in each of these States. In Louisiana, Alabama, Kentucky, and Missouri SNAP eligible LEP individuals make up four percent or less of the total population of these States, but the number of these individuals in each of these four States is more than 10,000.

Table III.8. States with the lowest number of LEP individuals at or under 130% FPL (10,000 or less)

State/Territory	LEP individuals at or under 130% FPL
New Hampshire	8,016
Alaska	6,414
Maine	5,053
South Dakota	4,825
North Dakota	4,123
Montana	3,217
Wyoming	3,132
West Virginia	3,028
Vermont	1,841

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

Table III.9. States with the lowest percent of LEP individuals at or under 130% FPL (4% or less)

State/Territory	Percent of LEP individuals at or under 130% FPL
Louisiana	4.0%
Wyoming	3.9%
Alabama	3.8%
Kentucky	3.7%
Missouri	3.6%
South Dakota	3.6%
Maine	2.5%
Vermont	2.1%
Mississippi	1.9%
Montana	1.8%
West Virginia	0.8%

Notes: This table only includes States and Territories with SNAP and excludes those with Nutrition Assistance Program (NAP).

Other language assistance options

In addition to collecting documents from States through the SNAP State survey, the study team assessed language services available to LEP individuals from each State agency's SNAP phone line, voice mail, and website. The study team also assessed whether assistance was available in other languages from EBT processors in case individuals had difficulties using their EBT card or accessing benefits.

Phone line language assistance options

For each State agency and Territory, members of the study team visited FNS' SNAP State directory on the FNS website (https://www.fns.usda.gov/snap/state-directory) and located the SNAP phone number for each State agency under SNAP State Information. Study team members then called each State's SNAP phone number to listen for language availability, wrote down information on languages available, amount of time it took to listen to the message, and links to voice translation services. The study team also listened to the English menu options and noted any similarities and differences in the phone line options. The key study findings from this review are the following:

- For five State agencies the call went directly to a representative as there was no automated or voicemail option (South Dakota, Virginia, Wyoming, Guam, and USVI).
- Ten State agencies had no other language option other than English when calling the State agency phone number.
- Seventeen states agencies only offer English and Spanish options on voicemail menus.
- Nine State agencies offer English, Spanish, plus one other language options on voicemail menus.
- The remaining 12 State agencies offer between 3 and 7 different language options in voicemail menus, including English and Spanish.

For those States that had language options other than English, study team members then assessed whether the language options were stated in that language. For example, whether the choice to hear the message or information in Spanish was stated in English or Spanish.

- Of the 17 State agencies that had no other language option other than Spanish when calling the State agency phone number, 16 of the 17 State agencies had voice messages recorded in Spanish to choose Spanish (Arkansas was the only State that did not have the option recorded in Spanish).
- In the nine States that had Spanish plus one other language option other than English, 8 of the nine States had voice messages recorded in both languages (Alabama was the only State that did not).
- Of the remaining 12 States with multiple language assistance options, all but Missouri offered the language assistance options in those languages.

For more detail on the key study findings by State please see Appendix E.

Website and EBT processor language assistance options

The study team also reviewed each SNAP State agency website to determine whether ~~the~~ website information was available in languages other than English for LEP individuals. For State agency websites, the study team reviewed whether the website was translated in any other languages, into which languages it was translated, and if there were any other translation services available if the website was not translated.

- Twenty-nine State agencies provide a language selector link on their SNAP State agency website to view the website in a language other than English.
  - Of the 29 States, seven States only offered this link for Spanish.
  - Of the remaining 22 States (after Spanish only is removed), the majority (17) offered a link to an online machine translation service (Google translate) on the top or bottom of their website that said, "Select language dropdown (Google translate)." This link allowed States to offer translated information on their website for 25+ or 50+ languages.
- Ten States had a tagline link on their websites for interpretation or language assistance via phone. Figure III.1 shows an example of a tagline link on a State agency's website.

Figure III.1 Example of a tagline link

Similarly, the study team also reviewed information available on EBT processors' websites for participant language assistance options with the online EBT platform in March 2023. The study team obtained links to the EBT processor for each SNAP State agency by using the FNS' SNAP State directory on the FNS website and clicking on the link to the State EBT Website.

The main pages of only five States agencies or Territories had EBT processor websites with options for translation into languages other than English - California, Colorado, Montana, Nebraska, and Pennsylvania.[5]

[5] We conducted this review of EBT processor websites in Spring 2023 and so updates may have been made to these websites since this time. We reviewed the EBT websites that were provided on this FNS website: https://www.fns.usda.gov/snap/state-directory. We only reviewed the homepages of the EBT processor websites. We were not able to log into the EBT processor sites to see if there were more language options offered after logged in.

IV. Key Survey Findings

In this section, the study team presents survey findings by research objective. For each objective, the study team summarizes the main findings from the survey data. Tables showing the study findings for each survey item are in appendix B. The data tables included in the body of this report show the key findings from the survey related to States' interpretation of policies and regulations and operations.

Federal civil rights regulations, policies, and guidance for language access

To describe how SNAP State agencies make decisions about Federal regulations, policies, and guidance related to language access, the study team asked about their understanding of Title VI and its USDA implementing regulations at 7 CFR 15, SNAP bilingual regulations at 7 CFR 272.4, the USDA LEP Guidance, and State-specific language access regulations and guidance. The USDA requires provision of "qualified, competent, and appropriate language services." To ensure that this happens State agencies are encouraged to conduct a four-factor analysis to determine the appropriate language assistance services to ensure that individuals with LEP have meaningful access to agency programs and activities. Thirty-two out of 49 State agencies (65 percent) answered that they have conducted a four-factor analysis. In addition, USDA, FNS recommends that States have plans in place to ensure that agencies provide high-quality and appropriate language services. Thirty-four out of 49 State agencies (69 percent) said they have a language access plan (LAP). Table IV.1shows the most common elements in those 34 LAPs.

Table IV.1. Elements of SNAP State agency language access plans (LAP), for State agencies with plans[1]

Elements	States including element in Language Access Plan
Notification of the availability of free language services	94.1
Staff training	94.1
Interpretation services	94.1
Written translations	85.3
Policies and procedures related to each of the language access plan elements	85.3
Assessing accessibility and quality controls	76.5
Needs and capacity self-assessment	70.6
Number of SNAP State agencies	34

[1] Thirty-four of the 49 State agencies said that they had a LAP and so these State agencies received this question about the elements in these plans.

Notes: All data are represented in percentage of SNAP State agencies. There were some missing values for each of these response categories ranging from 2.9% to 5.9%.

Source: The SNAP Language Access Survey.

Looking at the responses by type of SNAP administration, 29 out of 39 (74 percent) of State-administered SNAP programs have an LAP, while five out of 10 (50 percent) of county-administered SNAP agencies reported having a LAP. Furthermore, 25 out of 39 (64 percent) of State-administered SNAP agencies conduct a four-factor analysis, while seven out of 10 county-

administered SNAP agencies (70 percent) reported conducting a four-factor analysis (Table. IV.2).

Table IV.2. SNAP State agencies that have conducted a four-factor analysis and have a LAP, by type of administration

	State-administered	County-administered
Language access plan		
States that have a Language Access Plan	74.4	50.0
States that do not have a Language Access Plan	25.6	50.0
Ever conducted a four-factor analysis		
States that conducted a four-factor analysis	64.1	70.0
States that did not conduct a four-factor analysis	35.9	30.0
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

State agencies with a medium SNAP caseload size[6] were less likely than State agencies with small or large caseloads to conduct a four-factor analysis. Similarly, State agencies with medium caseloads were less likely to have an LAP (Table IV.3).

SNAP caseload size

- Small = State agencies with a range of 0-200,000 SNAP participants
- Medium = State agencies with a range of 200,001-700,000 participants
- Large = State agencies with a range of 700,001-5,300,000 participants

Table IV.3. SNAP State agencies that have a Language Access Plan and that have ever conducted a four-factor analysis, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
Language access plan			
States that have a Language Access Plan	73.3	50.0	83.3
States that do not have a Language Access Plan	26.7	50.0	16.7
Ever conducted a four-factor analysis			
States that conducted a four-factor analysis	66.7	50.0	77.8
States that did not conduct a four-factor	33.3	50.0	22.2
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

[6] We created the categories for small, medium, and large caseloads by using monthly data that FNS collects on the number of people participating in SNAP (according to the report that was updated on December 8, 2023). Small caseload size ranges from 21,000 to 189,000. Medium caseload size ranges from 241,000 to 682,000. Large caseload size ranges from 707,000 to 5,279,000.

Twenty-seven out of 49 State agencies (55 percent) designated a language access coordinator. Of these, 22 State agencies (81 percent) said that the language access coordinators were responsible for developing the LAP (Table IV.4). Several State agencies have additional LAP requirements in their subrecipient contracts. For example, 15 out of 49 State agencies (30 percent) require subrecipients to have a LAP and five out of 49 State agencies (10 percent) require the appointment of a language access coordinator.

Table IV.4. SNAP State agencies that have a language access coordinator and whether they are responsible for developing a language access plan

	SNAP State agencies
Language access coordinator responsible for developing a language access plan	
Yes, language access coordinator is responsible for developing a language access plan	81.5
No, language access coordinator is NOT responsible for developing a language access plan	18.5
Number of State agencies	27
Language access coordinator	
Yes, SNAP State agency has a language access coordinator	55.1
No, SNAP State agency does not have a language access coordinator	42.9
Missing	2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response.

Source: The SNAP Language Access Survey.

Fewer states—18 out of 49 (37 percent)—have a language access working group. States with large SNAP caseloads are more likely to have language access working groups (50 percent) than State agencies with small (33 percent) and medium (25 percent) caseloads (Table IV.5). Eight out of 49 State agencies (16 percent) have additional policies that go beyond Federal regulations, while 22 out of 49 State agencies (45 percent) offer language assistance services because of a court decision, complaint investigation, or compliance review.

Table IV.5. SNAP State agencies that have a Language Access Working Group, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States that have a Language Access Working Group	33.3	25.0	50.0
States that do not have a Language Access Working Group	66.7	75.0	50.0
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Language services offered by State agencies

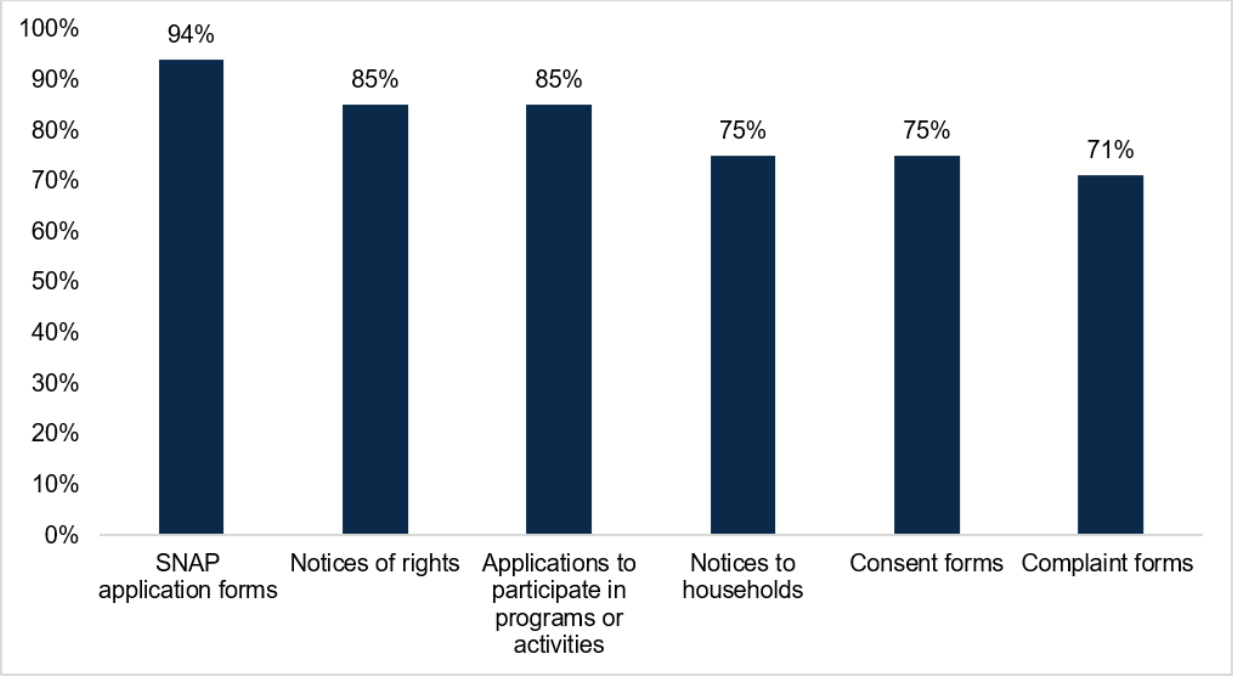
To describe the language access policy landscape in each State, the study team asked about the availability of translated documents, oral language assistance services, language options for websites and other online applications and services, and how States make decisions about language assistance services.

Translation services offered by State agencies

Forty-seven out of 49 State agencies (96 percent) reported translating at least one vital document. Figure IV.1 shows the types of vital documents that were translated by State agencies. The most common were SNAP application forms and the least common were complaint forms.

One out of 49 State agencies did not translate any vital documents. Many State agencies did not select any of the languages listed in their survey, which means that they may only have vital documents available in English and/or Spanish (n = 15)[7]. Some States, however, provide vital documents in at least one additional language (n = 32). Table IV.6 shows the range of languages used for vital documents.

Figure IV.1. Types of vital documents translated by SNAP State agencies (n=49)



Note: Vital documents are 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.

[7] In the survey questions A13 and A16 did not include an option for State agencies to select Spanish because FNS indicated that it is known that most State agencies provide services in this language. The survey prioritized asking about the availability of services in the top 9 languages (excluding Spanish) in their State based on the census data.

Table IV.6. Range of languages used for vital documents in State agencies[1]

	SNAP State agencies (Number)
No language selected	15
Vital documents translated into one to two languages other than English and Spanish	8
Vital documents translated into three to five languages other than English and Spanish[1]	24

[1] In question A13, the study team asked State agencies to select the top 5 languages that they translate vital documents into to limit the burden. It is possible that State agencies that selected 5 languages translate their documents into more languages.

Notes: Two State agencies were skipped out of A13 because they either opted not to answer A12 or answered that they do not translate any vital documents.

Source: The SNAP Language Access Survey.

Table IV.7 shows how State agencies determined to which languages to translate the vital documents. Additionally, Table IV.8 shows the most common reasons that State agencies decided to translate different types of vital documents.

Table IV.7. Methods SNAP State agencies use to determine the languages to translate vital documents to

	SNAP State agencies using method
Assessing the presence of language groups using State and local data	73.9
Activity delegated to each county	50
Assessing the presence of language groups using Federal data	47.8
Consulting community and/or faith-based organizations	41.3
Other method	10.9
Missing	2.1
Number of SNAP State agencies	47

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. Vital documents are 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. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response.

Source: The SNAP Language Access Survey.

Table IV.8. Reasons that SNAP State agencies translate vital documents for participants

	Consent forms	Complaint forms	Notice of rights	Applications to participate in programs	SNAP application form	Notices to Households
Unable to access or participate if translation unavailable	65.7	66.7	57.5	82.5	77.3	80
Termination from program if unable to understand the document	62.9	54.5	55	72.5	65.9	82.9
Could suffer significant harm if unable to understand the document	54.3	54.5	60	62.5	63.6	71.4
USDA provided translation guidance	65.7	75.8	77.5	75	79.5	77.1
Community provided feedback on needed translation	37.1	39.4	35	35	45.5	40
Other SNAP agencies recommended that documents should be translated	2.9	6.1	2.5	5	4.5	0
Missing	2.8	2.9	2.4	2.4	2.2	2.8
Number of SNAP State agencies	36	34	41	41	45	36

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response.

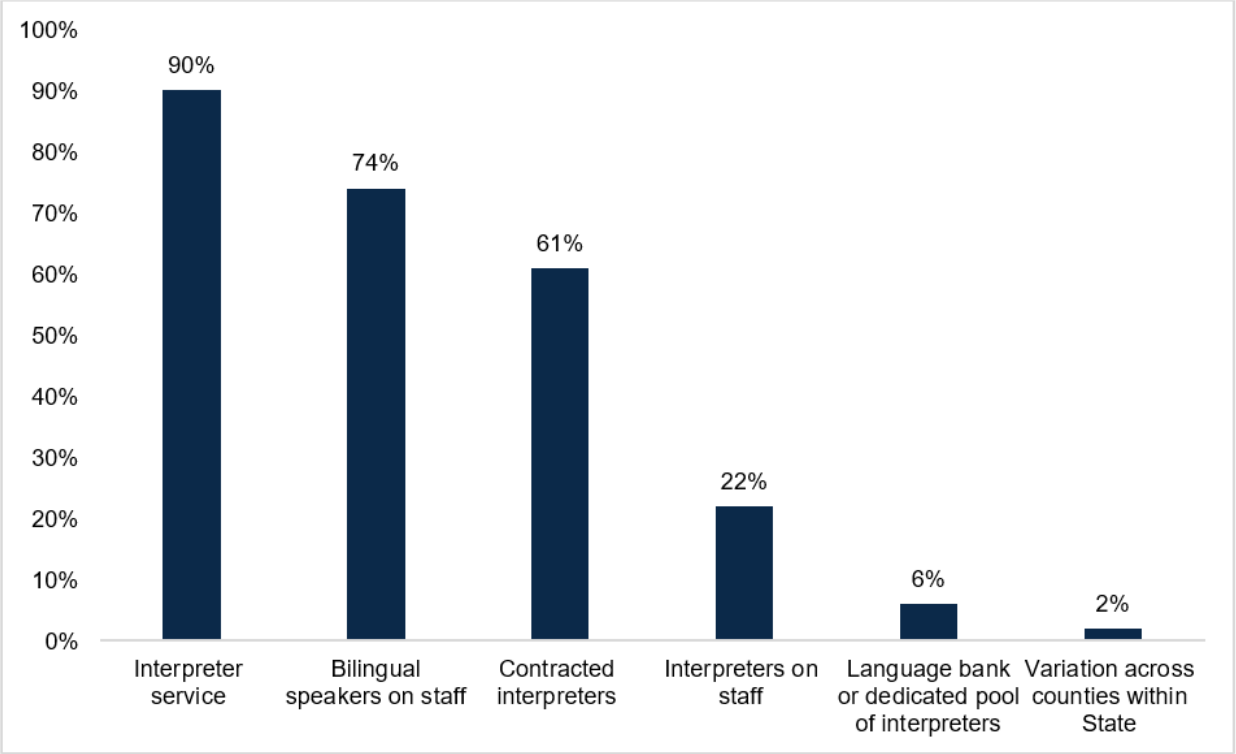
Source: The SNAP Language Access Survey.

Oral language assistance services (interpretation and direct, in-language communication) offered by State agencies

All State agencies provide at least one type of oral language assistance service. Forty-four out of 49 State agencies (90 percent) offer an interpreter service, which included telephone, internet, or video, and/or in-person services (Figure IV.2). Thirty-six out of 49 State agencies (74 percent) employ bilingual staff. However, State agencies relied more on contracted interpreters (61 percent) than staff interpreters (22 percent). One county-administered SNAP agency was

unable to answer the question because of variation in the oral language services across counties.

Figure IV.2. Oral language services offered by SNAP State agencies (n=49)



Other language assistance services offered by State agencies[8]

Some State agencies provide additional language assistance services. For example, 30 out of 49 State agencies (61 percent) provide English and non-English options on voicemail menus and/or messaging on customer service telephone lines. Thirty-three out of 49 State agencies (67 percent) offer multilingual services online, such as for State websites, online applications, or account management platforms. Twelve out of 49 State agencies (24 percent) do not offer either of these services. Table IV.9 shows the breakdown of different languages offered for voice and online services.

[8] This section is for "Other language assistance services" which refers to things that aren't interpretation or translation, so this includes voicemail menu, websites, etc.

Table IV.9. Languages other than Spanish offered for vital documents, recorded voice services, and multilingual online services[1]

	Vital documents	Recorded voice services with English and non-English options	Multilingual online services
Chinese	34.0	10	39.4
French	8.5	3.3	9.1
Tagalog	6.4	3.3	0
Vietnamese	40.4	16.7	24.2
Korean	14.9	3.3	18.2
German	0	0	3
Russian	25.5	10	12.1
Arabic	31.9	3.3	30.3
Haitian	14.9	3.3	12.1
Portuguese	10.6	6.7	12.1
Farsi	0	0	6.1
Somali	12.8	6.7	9.1
Urdu	2.1	0	3
Hmong	6.4	6.7	3
Burmese	4.3	0	3
Amharic	4.3	0	3
Navajo	0	0	3
Bosnian	2.1	0	3
Marshallese	4.3	0	3
Number of SNAP State agencies	47	30	33

[1] Multilingual online services may include state websites, online applications, or account management platforms.

Notes: All data are represented in percentage of SNAP State agencies. State agencies had the top 9 common languages for the State (excluding Spanish and English) preloaded into the survey for questions A13 and A16. State agencies were instructed to select the top five languages but may have chosen less than five languages, if applicable for their State agency.

Source: The SNAP Language Access Survey.

Additionally, 34 out of 49 State agencies (69 percent) use a qualified human translator to translate content, materials, or services provided online—for example, website, online automated applications, electronic benefit transfer (EBT) platforms, and so on. Fifteen out of 49 State agencies (30 percent) use automated machine translation software. Twelve out of 49 (24 percent) use FNS-provided translations of essential documents, and 12 out of 49 (24 percent) use contracted vendors to translate materials (Table IV.10).

Table IV.10. How SNAP State agencies translate content, materials, or services that are provided online

	SNAP State agencies
Qualified human translators	69.4
Automated translation software	30.6
FNS-provided translations of essential documents	24.5
Translated by contracted vendors	24.5
Other	2.0
SNAP State agency does not translate content, materials, or services that are provided online	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

SNAP language access procedures

To describe how State agencies implement policies and procedures that comply with Title VI and Federal regulations and guidance that deal with language access for persons with LEP, the survey asked how State agencies communicate about language assistance services; identify, record, and track language assistance needs; provide services to individuals with LEP; use friends, family, and children, to provide services; and face challenges providing language services.

Outreach to individuals with LEP

Forty out of 49 State agencies (82 percent) said that the most common way State agency staff conduct outreach to LEP communities about SNAP services is by collaborating with community-based organizations and other stakeholders to inform individuals with LEP of SNAP services. The least common way that State agency staff conduct outreach is by including notices in languages other than English in local newspapers or on the radio with 8 out of 49 State agencies (16 percent) using this method.

Notifying the public about the availability of free language assistance services

When asked about how frontline staff in the State inform LEP communities about the free language assistance services (such as the availability of interpreters or translated materials) the most common way is by posting signs in intake areas and other entry points, with forty out of 49 State agency (82 percent) using this method. Frontline staff also use community-based organizations to conduct outreach (29 of 49 States, or 59 percent). The least common way that frontline staff use is also by including notices in language other than English in local newspaper or on the radio or television with only 3 out of 49 (6 percent) using this method.

Identifying, recording, and tracking language assistance needs

Seventy-six percent of State agencies have a written procedure for how frontline staff determine whether an applicant or participant requires language assistance. Similarly, 37 out of the 49 State agencies (76 percent) have a written procedure for how frontline staff should document the language assistance services provided to applicants and participants who require language assistance. Forty-eight (48) out of 49 State agencies (98 percent) said they have a way for frontline staff to be notified of an existing customer's needs for written and/or verbal language assistance services. Forty-five out of 49 State agencies (92 percent) said that this notification is done by recording it in the eligibility and/or case management system and 26 out of 49 (53 percent) said that this is provided to frontline staff via email or telephone.

Translating written information and materials for individuals with LEP

Sixteen out of 49 State agencies (33 percent) say that it takes one day or less to get a document translated for a commonly spoken language. For a language rarely encountered, 15 out of 49 State agencies (31 percent) took over a week to get translated documents, while nine out of 49 State agencies (18 percent) do not offer translated documents in these situations.

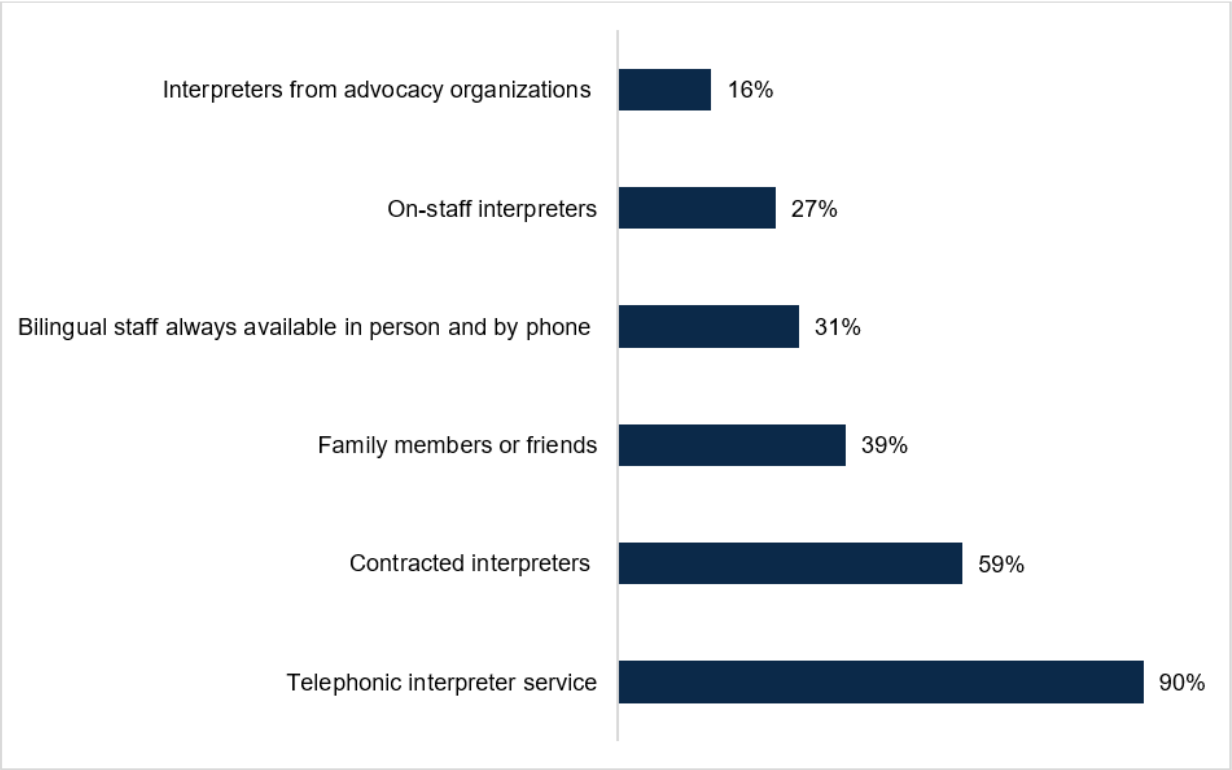
Providing interpretation services for individuals with LEP

When providing services to individuals with LEP, frontline staff most commonly communicate verbally with participants through a telephonic interpreter service and then through contracted interpreters. The third most common way was to use family or friends (Figure IV.3).

Forty-two out of the 49 State agencies (86 percent) take one day or less to get interpreters for individuals with LEP if their language is commonly spoken in the State or locality. If the individual with LEP speaks a language that is rarely encountered, 30 of the 49 State agencies (61 percent) said it takes one day to get interpreters.

Forty-eight out of 49 State agencies (98 percent) use an interpreter service (these services may be provided by telephone, internet/video, or in-person) if frontline workers are unable to communicate with an individual with LEP. Communicating in a language other than the individual's primary language (such as trying to communicate in English or a dialect or language similar to the individual's primary language) is the least common action frontline staff take when they are unable to communicate (4 of 49 States or 8 percent) and using picture aids (13 out of 49, or 37 percent).

Figure IV.3. Methods frontline staff use to communicate verbally with individuals with LEP (n=49)

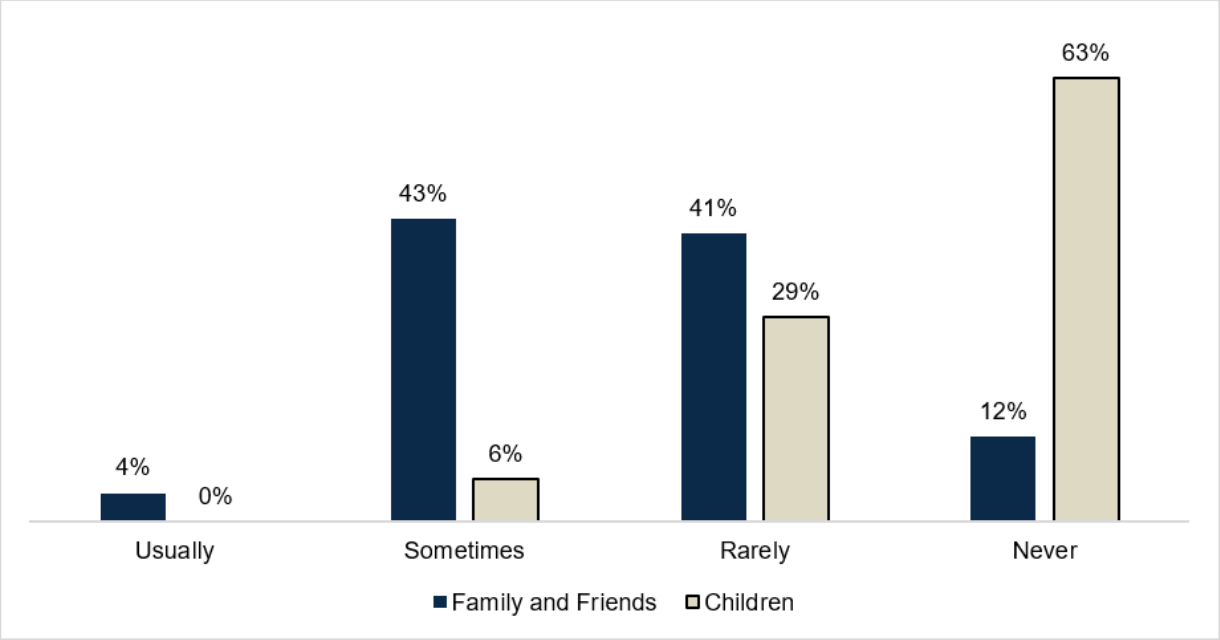


Notes: Respondents were able to choose more than answer to this question.

Use of family, friends, and children for providing language assistance services

Some State agencies permit the use of family, friends, and children to provide language services. The survey asked State agencies how frequently their frontline staff use family, friends, and children as interpreters (Figure IV.4.). Overall, using family and friends as interpreters was more prevalent than using children. States with small caseloads were more likely than States with medium and large caseloads to "sometimes" or "usually" use family and friends as interpreters. Fifty percent of States with medium SNAP caseloads said that they never use children as interpreters, compared with 73 percent of State agencies with small caseloads and 67 percent of States with large caseloads (Table IV.11).

Figure IV.4. Frequency in which SNAP State agencies frontline staff use family, friends, and children as interpreters (n=49)



Notes: There were no State agencies that answered that they "always" use family, friends, and children and so this response is not presented in this figure.

Table IV.11. Frequency that SNAP State agencies use family, friends, and children as interpreters, by SNAP caseload size

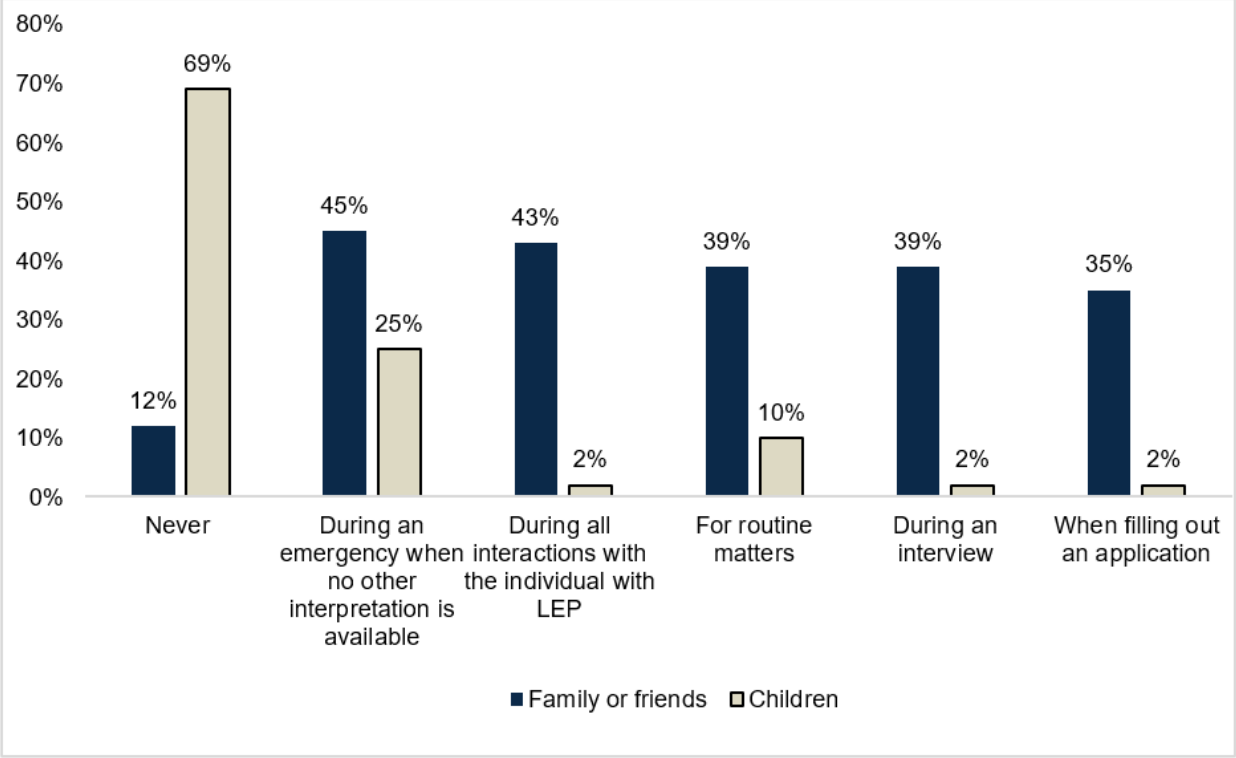
	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
Family and friends			
Always	0.0	0.0	0.0
Usually	13.3	0.0	0.0
Sometimes	53.3	37.5	38.9
Rarely	26.7	37.5	55.6
Never	6.7	25	5.6
Children			
Always	0.0	0.0	0.0
Usually	0.0	0.0	0.0
Sometimes	6.7	6.3	5.6
Rarely	20.0	37.5	27.8
Never	73.3	50.0	66.7
Missing	0.0	6.3	0.0
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response.

Source: The SNAP Language Access Survey.

Most commonly, the SNAP State agency permits the use of family, friends, and children as interpreters during an emergency when no other interpretation is available. Thirty-four out of 49 State agencies (69 percent) responded that they never permit the use of children as interpreters while six out of 49 State agencies (12 percent) say they never permit the use of family and friends as interpreters (Figure IV.5). Twelve out of 49 State agencies (24 percent) require persons with LEP to sign a waiver of rights to free interpreter services if they choose to use their family or friends as an interpreter.

Figure IV.5. Use of family, friends, and children as interpreters (n=49)



Notes: Respondents were able to choose more than answer to this question.

Challenges providing language assistance services

Table IV.12 shows the types of challenges that State agencies are facing while working with LEP applicants and participants. The challenge that affects State agencies the least is having difficulties accessing interpreter services. Only one out of 49 State agencies (2 percent) selected this response. The most common challenges in providing language services are not having enough bilingual staff, not having enough bilingual or multilingual staff on-site to provide services, and a lack of funding for working with individuals with LEP. When there are challenges in providing language services, 42 out of 49 State agencies (86 percent) do not allow any sort of exemption to individuals with LEP from work or other SNAP requirements.

Table IV.12. Problems and challenges that have developed working with LEP applicants/participants

Challenges	SNAP State agencies
Not enough bilingual staff	49.0
Not enough bilingual/multilingual staff onsite to provide services	46.9
Lack of funding	40.8
Not have enough translated materials	36.7
Not enough interpreters onsite to provide services	34.7
Not enough support for oversight and quality assurance	22.4
Other	22.4
There is not enough support for training	18.4
SNAP State agency has not experienced any challenges working with LEP individuals	16.3
Do not have access to interpreter services	2.0
Number of SNAP State agencies	49

Note: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

How States know that frontline staff are providing appropriate language assistance services

The top three methods that State agencies use to determine whether frontline staff are providing the appropriate language assistance services include the following:

1. Fifty-five percent of State agencies say that they get feedback from applicants and participants with LEP.
2. Forty-nine percent of State agencies say that they do this through evaluations conducted by leaders[9] of frontline staff.
3. Forty-one percent of State agencies say that they do quality assurance checks of records kept by frontline staff.

Additionally, the most common way participants with LEP can share their feedback and concerns about the agency's language assistance services is by frontline staff submitting feedback they receive from individuals and by calls on the toll-free number or via email. The least common way participants share feedback and concerns is the feedback section at the end of the application.

[9] "Leaders" is the general wording used in the survey, but it most likely would represent supervisors.

Hiring and evaluation practices for frontline staff providing languages services

State agencies determine whether interpreters, translators, and bilingual staff are qualified for these roles most commonly through certification, language tests or assessments, and interviews. The least commonly used processes were training attendance records and academic degrees. Eleven out of 49 State agencies (22 percent) specified that evaluations of qualifications for contract interpreters and translators are done through the State's procurement process and contracts with vendors. Twelve out of 49 State agencies (25 percent) said that they do not evaluate qualifications of interpreters and translators, while 16 out of 49 State agencies (33 percent) said that they do not evaluate the qualifications of bilingual staff (Table IV.13). Furthermore, 34 out of 49 State agencies (69 percent) said that they do not evaluate the qualifications of an advocacy organization's translators and interpreters.

Table IV.13. Qualifications that SNAP State agencies use to evaluate interpreters, translators, and bilingual staff during the hiring process

	Interpreters and Translators	Bilingual Staff
Academic degrees	14.3	16.3
Certification	38.8	24.5
Work experience	16.3	16.3
Interview	20.4	32.7
Language test or assessment	34.7	36.7
Training attendance records	10.2	4.1
SNAP State agency does not evaluate qualifications	24.5	32.7
Evaluations of qualifications are done through the State's procurement process and contracts with vendors	22.4	n/a
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

n/a = not applicable. This category was created based on common answers that the States provided in the other specify for interpreters and translators. This was not a commonly specified answer for bilingual staff.

Training for frontline staff on how to work with participants with LEP

The types of training for frontline staff on how to work with LEP participants varied among State agencies. Forty-six out of 49 State agencies (94 percent) conduct annual civil rights training for frontline staff. However, 33 out of 49 State agencies (67 percent) provide other types of training on language access procedures to frontline staff. A higher proportion of county-administered SNAP agencies provided other types of training (beyond the annual civil rights training) on language access procedures than State-administered programs (Table IV.14).

Table IV.14. SNAP State agencies providing other types (in addition to the civil rights training) of training on language access procedures to frontline staff, by type of SNAP administration

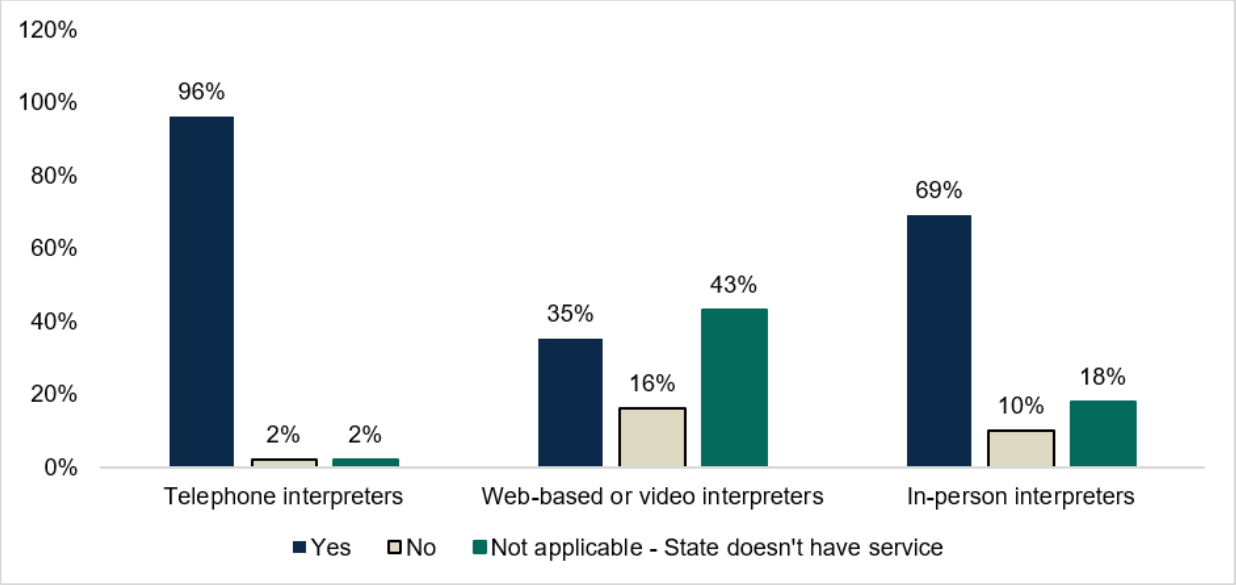
	State-administered	County-administered
States that provide other types of training on language access procedures	64.1	80.0
States that do **not** provide other types of training on language access procedures	35.9	20.0
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

However, 47 out of 49 State agencies (96 percent) said that they train frontline staff on how to use or arrange telephonic interpreters. Seventeen out of 49 State agencies (35 percent) have training for arranging web-based or video interpreters (35 percent), and 34 out of 49 State agencies (69 percent) provide training on arranging in-person interpreters (Figure IV.6).

Figure IV.6. Training for frontline staff on how to use or arrange for different types of interpreter services (n = 49)



Civil rights processes

State agencies most commonly inform SNAP individuals that they can file complaints about language access services directly with the USDA through the following:

1. Ninety-six percent of State agencies said that they do this by including the FNS-approved nondiscrimination statement on application forms.
2. Ninety-four percent of State agencies said that they display the USDA and Justice for All poster or an FNS-approved substitute in the office.

3. Eighty-one percent of State agencies said that they do this by posting this information on State SNAP websites.

Forty-one out of 49 State agencies (84 percent) have an FNS Civil Rights Division–approved process for handling civil rights complaints related to language access and national origin discrimination.

Eight (8) out of 49 State agencies (16 percent) said that in the past five years, their SNAP State agency had a finding of noncompliance for civil rights language access requirements.[10] Of the eight State agencies that had a finding of noncompliance, three State agencies had one to two findings; three State agencies had three to five findings; and two State agencies had more than 10 findings. All eight of these State agencies took the necessary corrective actions to resolve findings of noncompliance.

Six out of 49 State agencies (12 percent) said that they received civil rights complaints in the past 12 months that were specifically about language access. Two of those six State agencies (33 percent) had received one such complaint, at most. The types of allegations raised in these complaints varied (Table IV.15). More information about States' processes to address civil rights complaints can be found in appendix B.

[10] These can be a result of an FNS Management Evaluation or an FNS Civil Rights Compliance Review.

Table IV.15. Types of allegations raised in the civil rights complaints, related to language access services, received over the past 12 months (n=6)

Allegation Type		Number of State Agencies
	Failing to provide a qualified interpreter or translated materials	3
	Discrimination against a member of a State-specific protected class	2
	Reasonable steps not being taken to provide meaningful access to SNAP	2
	Incident with staff member(s)	2
	Denial of needed benefits and services	2
	Delay in service delivery	3
	Wrong services were provided	1
	Ineffective services were provided	3
	Voicemail menus on customer service lines are not accessible to persons with LEP	1

Source: The SNAP Language Access Survey.

SNAP E&T language access policies and services

Forty out of 49 State agencies (82 percent) said that their SNAP E&T providers offer services related to employment and training in a language other than English. In addition, 37 out of 49 (76 percent) of State agencies or SNAP E&T providers offer English as a Second Language (ESL) classes as an E&T component. State agencies or SNAP E&T providers most partnered with Workforce Investment and Opportunity Act Title II programs to provide the ESL classes. Other types of partners were less frequent (Table 6.2 in appendix B).

Although services are offered in languages other than English, 12 out of 47 State agencies (26 percent) said that there are no differences in SNAP E&T services from what is offered in English. Table IV.16 shows the main differences between SNAP E&T services offered in other languages from those offered in English.

Table IV.16. Ways in which SNAP E&T services offered in other languages differ from those offered in English

	SNAP State agencies
Fewer service options	25.5
More individualized support for SNAP E&T services offered in other languages	25.5
There are no differences from what is offered in English	25.5
Only offered at select locations	21.3
Other	21.3
Fewer community college classes	10.6
Limited staff support	10.6
Flexibility in guidelines for case staff	8.5
Missing	4.1
Number of SNAP State agencies	49

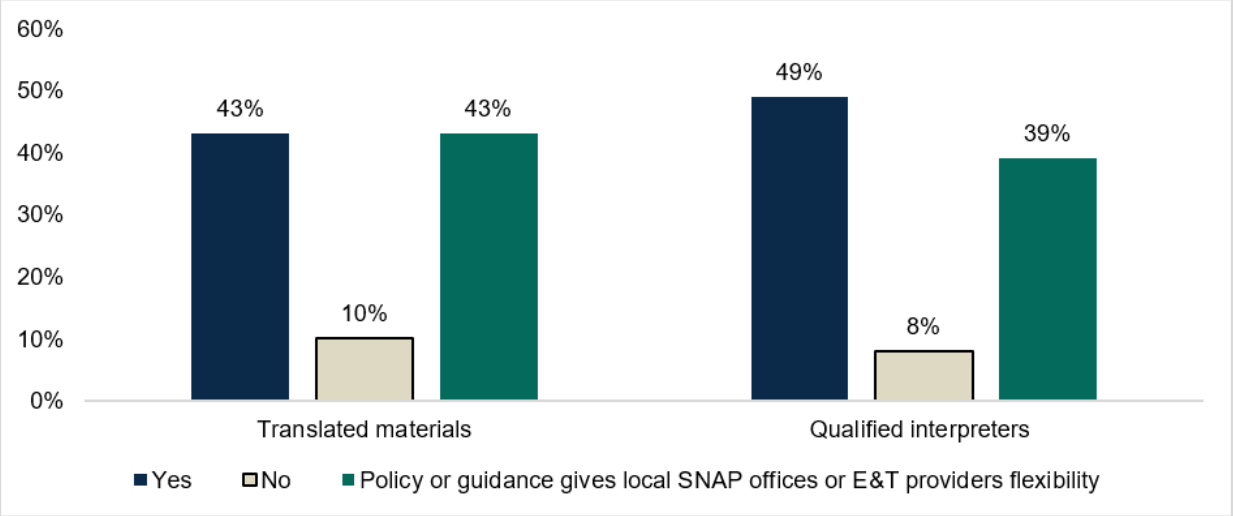
Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. Some of the "other" responses include limited offerings to some educational programs and third-party partners, possible delays in obtaining an interpreter, and that language barriers may hinder assignment. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response – reasons for not responding could be that the State agency does not offer services in other languages.

Source: The SNAP Language Access Survey.

In general, State agencies offer translated materials and qualified interpreters or give SNAP offices or E&T providers flexibility in how they provide this service (Figure IV.7).

Similarly, 22 out of 49 State agencies (45 percent) provide training to SNAP E&T providers about Title VI and their language access requirements. Another 18 out of 49 State agencies (37 percent) said that they give local SNAP offices or E&T providers flexibility in how their staff are trained (Table IV.17).

Figure IV.7. State agencies requiring SNAP E&T providers to provide translated materials and qualified interpreters (n = 49)



Notes: The percentages do not add up to 100 percent because 2 out of 49 States did not answer this question (4%).

Table IV.17. State agencies that provide training to SNAP E&T providers about Title VI and their language access requirements

	SNAP State agencies
Yes, the SNAP State agency provides the training	44.9
Policy or Guidance gives local SNAP offices or E&T providers flexibility	36.7
No training provided	14.3
Missing	4.1
Number of SNAP State agencies	49

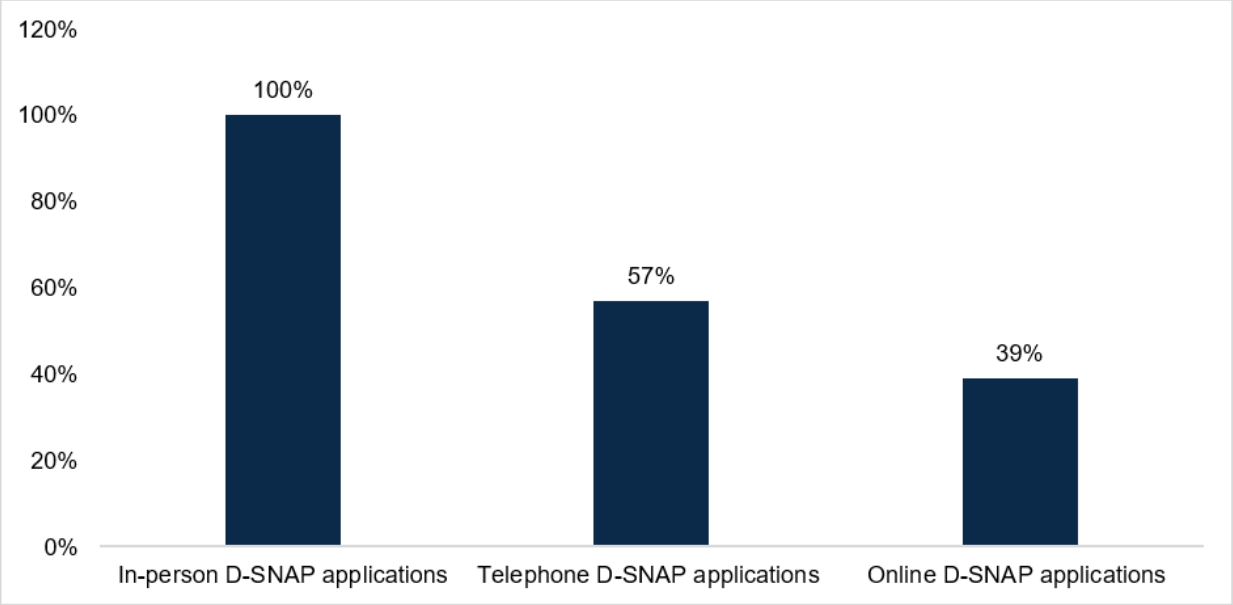
Notes: All data are represented in percentage of SNAP State agencies. For this table missing represents the SNAP State agencies that should have answered this question but opted to not provide a response – reasons for not including a response may be that they do not offer services in other languages.

Source: The SNAP Language Access Survey.

D-SNAP language access policies and services

Twenty-four of the 49 responding State agencies reported using D-SNAP within the last five years. These 24 State agencies were asked additional questions about D-SNAP language access procedures. Twenty out of 24 State agencies (83 percent) offer D-SNAP documents in languages other than English. Nineteen out of 24 (79 percent) have qualified interpreters available for D-SNAP when needed. State agencies can use in-person, telephonic, or online applications. Figure IV.8 shows the types of D-SNAP applications that 23 State agencies used in the last five years.

Figure IV.8. Types of D-SNAP applications that SNAP State agencies offer (n = 23)



Depending upon the type of D-SNAP application offered by State agencies, different language assistance options are available. Table IV.18 shows the different language assistance options available for in-person, telephone, and online D-SNAP applicants.

Table IV.18. How SNAP State agencies provide language assistance during D-SNAPs to applicants who apply in person, via telephone, or online

	SNAP State agencies
In person (N=23)[1]	
Translation and interpretation services are available virtually	91.3
Translation and interpretation services are available on site	60.9
Written translated materials are available on site	56.5
Other	8.7
Pre-recorded informational messages are broadcasted in multiple languages at the application site	0.0
Telephone (N=13)	
Telephone translation and interpretation services available	100.0
Pre-recorded informational messages are broadcast in multiple languages	0.0
Other	7.7
Online (N=9)	
Online translation and interpretation services available	66.7
Written translated materials are available online	55.6
Other	22.2
Video services provided by SNAP State agency	11.1

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section. There was one State that did not answer question F2 and so they were skipped out of question F3, F4 and F5. The survey questions can be reviewed in appendix D. Some of the "other" responses included specifying that online applications are available in specific languages.

Note: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

State agencies reported how they might accommodate D-SNAP applicants with LEP who need language assistance in a language not regularly used in D-SNAP. Nineteen out of 24 State agencies (79 percent) will find someone who can interpret or translate their service offerings for the individual free of charge. Seven out of 24 State agencies (29 percent) said that they use their vendor contracts with language services to provide the needed language. Four out of 24 State agencies (17 percent) said that they would refer the individual to other organizations or resources.

State agencies train staff who provide D-SNAP services on Title VI and language access requirements most commonly through online training, with 14 out of 24 (58 percent) of State agencies training in this mode. The least common way was through conferences, with no State agencies saying that training was done this way and only one out of 49 State agencies (4

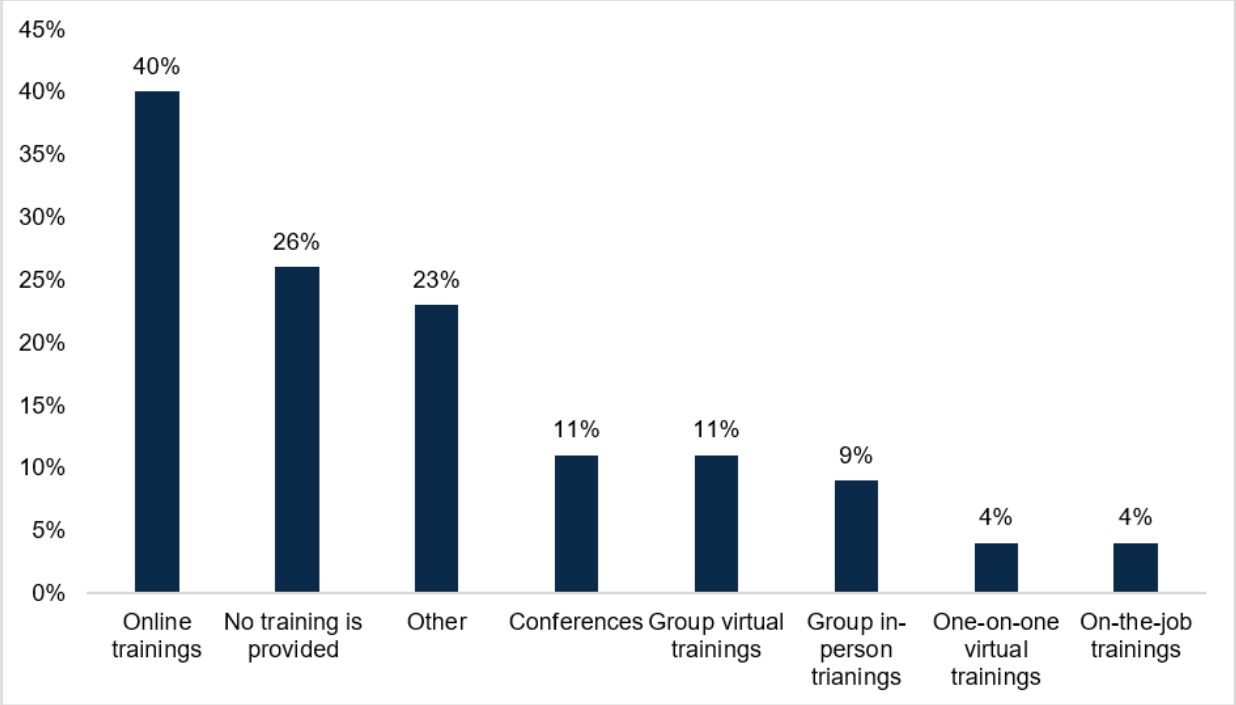
percent) saying it conducts training through one-on-one trainings. Only two percent of State agencies said no training is provided to D-SNAP providers on their language access policy, plans, and procedures.

SNAP-Ed language access policies and services

Forty-two out of 49 State agencies (86 percent) said that SNAP-Ed contractors offer SNAP-Ed documents in languages other than English. Thirty-four out of 49 State agencies (69 percent) require SNAP-Ed contractors to use translated materials so that individuals with LEP can access SNAP-Ed opportunities. Thirty-two out of 49 State agencies (65 percent) require SNAP-Ed contractors to use qualified interpreters so that individuals with LEP can access SNAP-Ed opportunities.

Twelve out of 47 State agencies (26 percent) do not provide training to SNAP-Ed contractors on Title VI and language access requirements. Online trainings are the most common way State agencies provide training to SNAP-Ed contractors about Title VI and language access requirements (Figure IV.9).

Figure IV.9. Ways in which State agencies train SNAP-Ed contractors on Title VI and language access requirements (n=47)



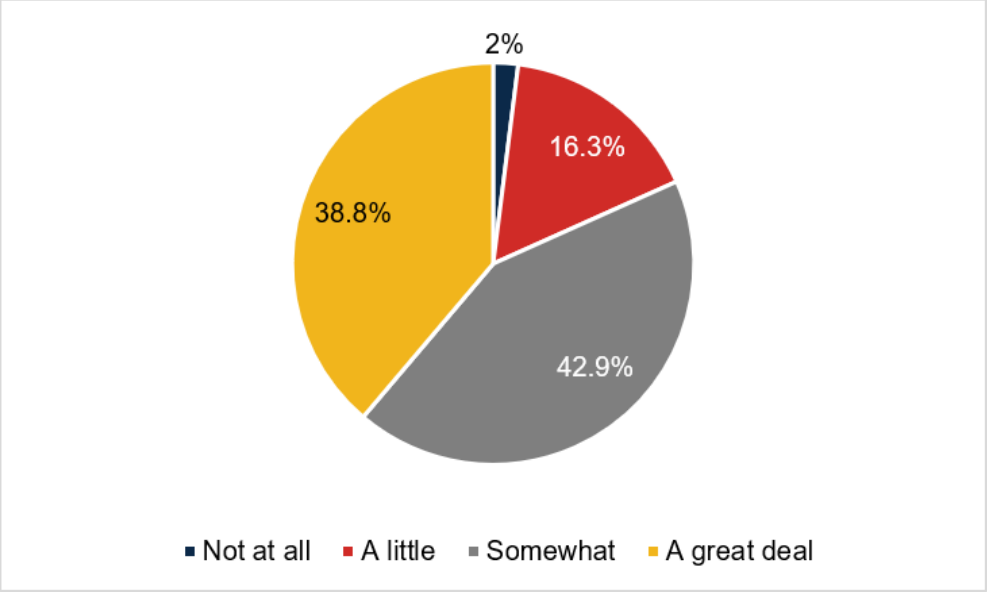
Note: Respondents were able to choose more than answer to this question. Some of the reasons that respondents included in the "other" responses were that they are also provided with the annual civil rights training or that there are informal trainings and discussions about requirements.

State agency perceptions about Federal LEP policies

State agencies' understanding about Title VI and the Federal language access regulations and guidance varies:

- Eight out of 49 State agencies (16 percent) have a little understanding of these regulations and guidance.
- Twenty-one out of 49 State agencies (43 percent) somewhat understand the regulations and guidance.
- Nineteen out of 49 State agencies (39 percent) have a great deal of understanding about the regulations and guidance.

Figure IV.10. State agencies' understanding about Title VI and the Federal language access regulations and guidance (n=49)



What do State agencies need most to ensure individuals with LEP have meaningful access to SNAP?

To ensure that individuals with LEP have meaningful access to SNAP, State agencies most commonly said that they needed increased funding (69 percent), increased staffing (65 percent), and translated materials (59 percent). Only two of the 49 State agencies (4 percent) said that they would not need any additional resources. Table IV.19 provides a full list of the resources that State agencies indicated that they needed.

Table IV.19. Additional resources SNAP State agencies need to ensure individuals with LEP have meaningful access to SNAP

	SNAP State agencies
Increased funding	69.4
More staffing	65.3
Translated materials	59.2
Support for agency staff training	53.1
External resources	36.7
Support for oversight and quality assurance	34.7
Translator and interpreter services	22.4
No additional resources needed	6.1
Other	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Thirty-eight State agencies (78 percent) said that they want FNS to provide examples of best practices in how other SNAP agencies implement Title VI and Federal regulations and guidance on language access—which may include examples of documents, tools, training, and so on.

State agencies typically do not share language assistance resources with other SNAP State agencies but do with other agencies within their State:

- Seven out of 49 State agencies (14 percent) share resources with SNAP agencies in other States.
- Twenty-three out of 49 (47 percent) percent) said that they share resources with other agencies within their own State.
- Twenty-two out of 49 (45 percent) said that they do not share resources with other SNAP agencies or with other agencies in their State.

How do State agencies perceive FNS communications on language access requirements?

State agencies were split when asked if they regularly communicate with FNS about language access requirements, with 23 out of 49 State agencies (47 percent) saying yes and 26 out of 49 (53 percent) saying no. State agencies with medium caseloads were more likely to say that they do not regularly communicate with FNS (Table IV.20) than States agencies with small or large caseloads. Thirty-three out of 49 State agencies (67 percent) strongly agree or agree that they receive enough technical assistance from FNS about language access requirements. About 33 % of State agencies disagreed.[11]

Table IV.20. SNAP State agency communication with FNS about language access requirements, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States regularly communicate with FNS	53.3	31.3	55.6
States do **not** regularly communicate with FNS	46.7	68.8	44.4
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

[11] No State agencies strongly disagreed with this statement.

V. Key Findings from the Document Review

In this section, the study team presents key findings from document review. The study team asked State agencies to send additional documentation about their language access programs and policies. Specifically, the study team asked for a copy of their language access plan (if they have one), State guidance or policy documents related to language access, informational materials on how SNAP State agencies operate language access policies and procedures, State guidance or policy documents related to submitting and/or addressing civil rights complaints, informational materials they provide to SNAP participants on submitting civil rights complaints, and training materials for frontline staff on language access obligations. The study team summarizes the available documentation for SNAP guidance and policies related to language access, informational materials about SNAP, information about civil rights complaints, and training materials.

Of the 49 State agencies that completed the survey, 21 State agencies sent us all[12] of their available documentation, 20 State agencies sent some documentation, and eight State agencies did not send any documentation. The study team was able to gather at least one piece of documentation from most State agencies. Table V.1 summarizes the number of State agencies that sent each type of requested document. Table. V.2 provides a summary of the documents that State agencies could and could not provide.

Table V.1. Summary of number of documents received

Document type	States that Sent Document (#)
State guidance or policy documents related to submitting and/or addressing civil rights complaints	32
Informational materials provided to SNAP participants on submitting civil rights complaints	30
State guidance or policy documents related to language access	27
Informational materials on how the SNAP State agency operates language access policies and procedures	16
Language access plans	17
Training materials for frontline staff on language access obligations	13

[12] We do not know if they provided us with all their documentation, but these State agencies gave us at least one document for each document type we requested.

Language access plan

In the survey, 34 State agencies said they have an LAP. Of these 34 State agencies, 17 sent us a copy of their LAP, 11 did not send their LAP, and six State agencies said in the survey that they could not share their LAP. Some LAPs were sent as stand-alone documents; some were sent as part of a State agency's SNAP procedural manual.

State agency guidance or policy documents related to language access

In the survey, 34 State agencies said they could provide us with documents related to their language access guidance or policy documents and 15 State agencies said in the survey that they could not share[13] or did not have any document to provide. Of the 34 State agencies that said they could provide documentation, 27 sent us materials and seven did not. The study team received documents describing translation and/or interpretation services, nondiscrimination policies and laws, and protocols related to serving participants and applicants with LEP, among other documents.

Table V.2. Summary of documents that State agencies could and could not provide[1]

Document type	Number of State agencies that indicated they have this document	Number of State agencies that sent the documentation (a)	Number of State agencies that said they would send the document but did not (b)	Number of State agencies that could not share[2] the document or did not have any documents to share (c)
Language access plan	34	17	11	6
State guidance or policy documents related to language access	34	27	7	15
Informational materials on how the SNAP State agency operates language access policies and procedures	25	16	9	24
State guidance or policy documents related to submitting and/or addressing civil rights complaints	37	32	5	12
Informational materials provided to SNAP participants on submitting civil rights complaints	39	30	9	10
Training materials for frontline staff on language access obligations	26	13	13	23

[1] All columns a, b, and c sum to 49, except for the row describing language access plans. Only the 34 State agencies that answered in the survey that they have a language access plan received the question asking for their plans.

[2] State agencies could indicate in the survey if they could not share the document.

[13] State agencies were able to select the response in the survey that said that they "cannot share" the document.

Informational materials on how the SNAP State agency implements language access policies and procedures

Twenty-five State agencies reported that they could provide us with documentation related to informational materials on how their SNAP State agency implements its language access policies and procedures, while 24 State agencies said in the survey that they could not share or did not have any document to provide. Of the State agencies that could provide them, 16 sent us the informational materials and nine did not. State agencies sent compliance review plans, LEP policy and procedures documents and manuals, guidelines for providing interpreter services, and LEP protocols, among other documents.

State agency guidance or policy documents related to submitting and/or addressing civil rights complaints

Thirty-seven State agencies said they could provide us with documentation related to their guidance or policy documents on submitting and/or addressing civil rights complaints, while 12 State agencies said in the survey that they could not share or did not have any document to provide. Of the 37 State agencies that could provide these documents, 32 sent us materials and five did not. State agencies sent copies of civil rights operational policies and procedures, civil rights training requirements, nondiscrimination statements, memos regarding fair hearings, social services manuals, discrimination and harassment-free workplace policies, and civil rights grievance procedures, among other documents.

Informational materials provided to SNAP participants on submitting civil rights complaints

A total of 39 State agencies said they could provide us with documents related to the informational materials they provide to SNAP participants on submitting civil rights complaints, while 10 State agencies said in the survey that they could not share or did not have any document to provide. Of the 39 State agencies that could provide materials, 30 sent us documents and nine did not. State agencies sent documents that describe participant rights to file a complaint, nondiscrimination statements, and frequently asked questions, among other documents.

Training materials for frontline staff on language access obligations

In the survey, 26 State agencies said they could provide us with documents related to their training materials for frontline staff on language access obligations and 23 State agencies said in the survey that they could not share or did not have any documents to provide. Of the 26 State agencies that could provide documentation, 13 submitted materials and 13 did not. About five State agencies sent us civil rights training materials and nine State agencies sent us other types of training materials like new hire training checklists, language assistance training, lesson plan notes, and interpreter services PowerPoints.

VI. Conclusions and Recommendations

Providing language access services to SNAP applicants and participants varies depending upon the State and many factors such as the SNAP caseload size, number of individuals with LEP in the State, and whether SNAP is a county or State-administered program. Below is a summary of key conclusions and recommendations to support State agencies in providing language assistance services to individuals with LEP.

- **State agencies with medium caseloads seem to have the greatest need for support in conducting a four-factor analysis or creating a Language Access Plan.**
- **Twenty-seven State agencies have a Language Access Coordinator. Of those State agencies with Language Access Coordinators, 22 State agencies use them to develop their Language Access Plans.**
- **The most common way that State agencies notify the public of free language assistance services is by posting signs in intake areas and other entry points.**
- **One of the most useful ways that State agencies could be supported is through examples of best practices** in how other SNAP agencies implement policies and procedures that ensure meaningful access for individuals with LEP in accordance with Federal regulations, policy, and guidance.
- **More State agencies share language assistance resources with other agencies within their State (23 out of 49) rather than sharing with SNAP agencies in other States (7 out of 49).** Many State agencies (22 out of 49) said that they do not share language assistance resources within their State or with other States. Sharing examples of documents, tools, training, and so on may be a useful way to improve language access for SNAP participants and applicants.
- **To ensure that individuals with LEP have meaningful access to SNAP, State agencies reported that they would also need increased funding and staffing, translated materials, and support for agency staff training.**
- **State agencies rely heavily on interpretation services, especially contracted services, to communicate with SNAP participants and applicants in the languages that they need to receive services.** Most State agencies do not allow any sort of exemption to individuals with LEP from work or other SNAP requirements. However, of the State agencies that do not allow exemptions, 41 out of 42 State agencies (98 percent) said that their staff do have access to a telephonic interpreter service. It is likely that staff use the telephonic interpreter service in the situations where their frontline staff cannot provide services in an individual's language.
- **Training on language access policies and procedures varies across State agencies and subrecipients**. Almost all States provide annual civil rights training, but there is inconsistency when it comes to training on language access procedures to frontline staff. For example:

- Twenty-two out of 49 (45 percent) of **SNAP E&T providers** said that their SNAP agency provides training and 18 out of 49 (37 percent) said that their policy or guidance gives local SNAP offices or E&T providers flexibility in how their staff are trained about Title VI and their language access requirements.
- Only one out of the 24 State agencies who needed to use a D-SNAP in the last 5 years said that their agency does **not** provide any training to **D-SNAP providers** on their language access policy, plans, and procedures.
- Twelve out of 47 State agencies (26 percent) do not provide training to SNAP-Ed contractors on Title VI and language access requirements.

State agencies still use family, friends, and sometimes children as interpreters. Mostly this is done during emergencies, especially in the case of when children are used as interpreters. State agencies do use family and friends occasionally at other points in the application process. Increasing the training and resources for staff in these State agencies may help reduce the use of family, friends, and children. There was some variation depending on State caseload size on use of family, friends, and children as interpreters. States with small caseloads were more likely than States with medium and large caseloads to "sometimes" or "usually" use family and friends as interpreters. States with medium caseloads were a little more likely to use children as interpreters. Fifty percent of States with medium SNAP caseloads said that they never use children as interpreters, compared with 73 percent of State agencies with small caseloads and 67 percent of States with large caseloads.

Appendix A

Research Questions

Table A.1. SNAP State Agency Survey research objectives, research questions, and protocol question numbers

Research objectives and research questions	SNAP State Agency Survey question numbers
Objective 1. Describe how each State agency makes decisions about addressing LEP regulations and policies and civil rights regulations and policies as related to LEP	
1. How well do States understand the USDA Title VI and its implementing regulations (7 CFR §15.1), USDA SNAP bilingual regulations (7 CFR § 272.4(b) et seq.) and the USDA LEP Guidance (79 FR 70771)?	A1, A2, A3, A4
2. Do States have their own program or civil rights regulations or policies for working with LEP applicants/participants?	A5, A8
3. How do States decide which languages to provide translation services for?	A14
4. How do States decide which languages to provide interpretation services for?	A9, A10
5. What are the provisions for someone whose only proficiency is in a language not commonly used in the State?	A17
6. What provisions are made for languages that are mostly spoken instead of written?	A18
7. Is the State/agency offering language assistance services as a result of a court decision, complaint investigation or compliance review?	C1
Objective 2. Describe the LEP policy landscape in each State	
1. What documents are translated and into which languages are they translated?	A12, A13
2. What are the language options for websites, online applications, and account management platforms?	A15, A16
3. Are online services translated using a machine translation software or qualified human translators?	B16
4. How does a State/agency determine what mix of languages services to provide?	A6
5. How does the State/agency determine which written material (paper or electronic) will be translated?	A12a
6. What process does the State agency use to determine whether its contracted language assistance services are qualified and competent?	B18; B19
7. How does the State agency ensure that changes made to English documents are simultaneously translated into frequently encountered languages?	B31
8. What language assistance resources are available to help applicants/participants access online websites, portals, or applications?	B17
9. How does the State agency, local agencies and subrecipients (e.g. E&T providers) ensure LEP persons have meaningful access to telephone voice mail menus on customer service lines used for SNAP? Are there Spanish and other language options on these lines?	A15, A16
10. How do State agencies ensure subrecipients and community partners that provide SNAP programs and activities take reasonable steps to ensure meaningful access for LEP persons?	B3; B6
11. Does the SNAP agency utilize qualified translators to translate program information on digital services such as websites, online automated applications, EBT platforms, etc.?	B16

Research objectives and research questions	SNAP State Agency Survey question numbers
12. How does the SNAP agency determine whether the interpreters and translators used for SNAP services are qualified and competent to interpret or translate?	B18,
13. If bilingual staff are used to interpret or to communicate in-person with LEP applicants and participants, how does the SNAP provider determine if they are qualified to do so?	B19
14. How does the State agency ensure translation accuracy, integrity, and cultural competency?	B32
15. For languages that might have regional variation (e.g., Puerto Rican Spanish vs. Mexican Spanish) does that State use multiple translations?	A20
16. 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, LEP applicants without and appointment visit the office and cannot communicate)?	A19
17. What restrictions or limitations do SNAP providers have on the use of family, friends, and children as interpreters?	B27, B28
18. How frequently do SNAP providers use family, friends, and children as interpreters?	B29, B30
19. Does the State agency require LEP persons to sign a waiver of right to free interpreter services if the LEP person chooses to use their family or friend as an interpreter?	B26
20. Does the State agency provide the same level of language assistance services to LEP persons in rural and urban areas?	A25
21. How does the State agency, local agency and subrecipients record and track the primary language spoken and the language assistance provided at the point of contact with individuals with LEP	B9; B9a
22. How does the State agency conduct a self-assessment of language assistance needs in each SNAP/NAP service area?	A3
23. How does the community provide feedback on the language access policies, plans, and procedures?	A7
Objective 3. Describe the LEP operations landscape in each State	
1. How does the State agency provide interpretation services for interviews or other verbal communications?	B21
2. How does the State agency or local agency conduct outreach to LEP communities regarding SNAP services?	B4
3. How does the SNAP provider notify the LEP public about the availability of no-cost language assistance services (interpreters and translated materials) in a language that they can understand?	B5
4. How long does it take to get translated documents to an applicant/participant if their language is commonly spoken in the State or in a locality in the State?	B22
5. How long does it take to get interpreters for applicants/participants if their language is commonly spoken in the State or in a locality in the State?	B23
6. How long does it take to get translated documents to an applicant/participant in a rarely encountered language?	B24

Research objectives and research questions	SNAP State Agency Survey question numbers
7. How long does it take to get interpreters for applicants/participants for a rarely encountered language?	B25
8. How does the State agency determine whether frontline staff at SNAP and other subrecipient and community partner agencies are providing the appropriate language assistance services at the point of contact with applicants and participants with LEP?	B6
9. Is there a system notification in place to notify frontline staff/case workers which language assistance services the client will need for purposes of communications (both written and verbal)?	B7
10. Is there a State Agency procedure regarding how, on an individual basis, front line workers determine whether someone is LEP?	B8
11. Is there a State Agency procedure regarding how frontline staff are supposed to record and track the language assistance services provided to LEP applicants and participants at the point of service?	B9; B9a
12. How often does a State agency or local agency respond to requests for documents or interviews in languages they do not routinely encounter?	B10, B10a; B11, B11a
13. What does the State agency do when there is no frontline worker able to communicate with the participant in their language?	B13
14. What other problems and challenges have developed working with LEP applicants/participants?	B12
15. Are there advocacy organizations that help provide translation or interpretation services? If so, how does the State agency or local agency determine whether these interpreters and translators are qualified and competent to provide language assistance services?	B20
16. What is the State agency's procedure when the SNAP provider is unable to provide language services to a LEP applicant/participant?	B13
17. Are LEP participants granted exemptions (e.g., work requirements) in these circumstances?	B14
18. Is there a mechanism for applicants/participants to provide feedback or express concerns to States agencies or counties regarding the language assistance service or lack thereof?	B15
Objective 4. Describe how State Agencies (front line staff and other service providers) are trained to work with LEP participants	
1. Do new frontline staff and other frontline staff receive training on their language access obligations?	D1, D2
2. How are front line staff and other staff informed of changes in language access policies, plans and procedures?	D3;
3. How do front line and other staff give feedback on challenges in implementing the language access policies, plans and procedures?	D4
4. How does the State or local agency train SNAP, SNAP-Ed, SNAP E&T, and D-SNAP staff on its language access policies, plans and procedures?	D5; E2;G2; F6

Research objectives and research questions	SNAP State Agency Survey question numbers
5. Are bilingual staff that are used as interpreters required to take a professional interpreter training course? Are their language skills tested by a third-party evaluator?	D6
6. Does the state have a process for/does it prioritize hiring case workers and other frontline staff that speak languages other than English?	A11
7. Are staff trained on how to use telephonic language line interpreters and in-person interpreters?	D7
8. How are E&T providers informed of Title VI and their language access requirements?	E1
9. Does the State/county provide E&T providers with training about Title VI and their language access requirements?	E2
10. How are SNAP-Ed providers informed of Title VI and their language access requirements?	G1
11. Does the State provide training to SNAP-ed implementing agencies/ providers about Title VI and their language access requirements?	G2
12. Do State agencies require SNAP-Ed implementing agencies (e.g. community partners) to provide qualified interpreters and translated materials to access SNAP-Ed opportunities?	G3
13. Does the State provide SNAP-Ed materials in languages other than English?	G4
Objective 5. Describe how SNAP State agencies implement the language access requirements within the Federal-State Agreement during the pre-award and post-award processes to ensure meaningful access to SNAP, SNAP-Ed, SNAP E&T and D-SNAP for LEP persons	
1. Has the SNAP State agency designated a Language Access Coordinator to develop and implement a Language Access Plan?	B1; B2
2. Does the SNAP State agency require its subrecipients to develop a Language Access Plan and to appoint a Language Access Coordinator?	B3
Objective 6. Describe the E&T landscape for LEP participants in each State	
1. Do States offer ESL classes as an E&T component?	E8
2. When States provide ESL courses, do they partner with WIOA Title II LEP programs, or rely on other types of LEP programs?	E9
3. Do State agencies offer E&T programs in languages other than English?	E3
4. Do State agencies require E&T providers to provide qualified interpreters and translated materials to access SNAP E&T opportunities?	E7
5. How does the State determine in what languages to provide these services?	E4
6. How are these programs different from other E&T programs?	E10
7. How do States inform/educate LEP applicants/participants of E&T services in a language that they can understand?	E5; E6
8. Do States that mandate E&T participation exempt LEP individuals? If so, how do they screen for an LEP exemption (that is, how do they determine someone is LEP)?	E11 – E13
9. In States that mandate E&T participation and do not have an LEP exemption, how do they ensure LEP individuals are placed into an appropriate component?	E15

Research objectives and research questions	SNAP State Agency Survey question numbers
10. In States that mandate E&T participation and do not have an LEP exemption, is good cause used to ensure adverse action is not taken against participants who cannot participate in programs due to language barriers?	E16
11. How States operating mandatory E&T programs screen for LEP before referring someone to E&T and how the take LEP into consideration when they don't have language assistance services. For example, do States refer LEP recipients to job search or other components where they aren't likely to succeed?	E14
Objective 7. Describe how LEP policies function under D-SNAP in each State	
1. How are language assistance services provided during D-SNAPs?	F3
2. How are language assistance services provided during D-SNAPs to applicants that apply in person, online or by telephone?	F3; F4; F5
3. Does the State agency have pre-translated D-SNAP materials for multiple languages in their States?	F7
4. How does the State agency decide in which languages to have D-SNAP materials translated?	F8
5. Does that State agency have qualified interpreters in reserve in case of a D-SNAP?	F9
6. How does the State agency determine in which languages to have the qualified interpreters in reserve?	F10
7. How does the State agency deal with LEP applicants for D-SNAP if they need language assistance services in a language not regularly used in the D-SNAP area?	F11
8. How does the State determine the languages in which D-SANP outreach should take place?	F12
Objective 8. Describe how civil rights complaints are addressed	
1. How does the SNAP State agency inform complainants that they can file a complaint regarding language access directly with the USDA?	C2
2. How many civil rights complaints regarding language access for individuals with LEP has the State agency received in the past 12 months?	C7; C8
3. Does the State agency have a FNS-approved civil rights complaints processing procedure to investigate language access complaints at the State level?	C3
4. Did the State agency inform FNS Civil Rights Division when they received these complaints prior to initiating an investigation of the allegations?	C10
5. What types of allegations are raised in these complaints (i.e., failed to provide a qualified interpreter of translated materials, online application system is not available in frequently encountered languages, etc.)?	C9
6. How many of the complaint investigations resulted in a determination of noncompliance or unlawful discrimination?	C11
7. How has the SNAP State agency responded to findings about civil rights complaints regarding language access for individuals with LEP?	C12
8. What is the number of findings made in a FNS Civil Rights compliance review or FNS Management Evaluations?	C4, C5
9. Has the SNAP State agency taken the corrective actions to resolve findings made in a FNS Civil Rights compliance review or FNS Management Evaluations?	C6

Research objectives and research questions	SNAP State Agency Survey question numbers
Objective 9. Collect State agency perceptions about Federal LEP policies, Federal regulations, and statutes	
1. Do State agencies believe they understand Title VI and the Federal language access regulations and guidance?	A31
2. What kind of information do State agencies want from FNS about Title VI language access regulations and guidance?	A22
3. Do State agencies believe they have the resources to properly implement language access plans, policies, and procedures to meet Federal and State regulations and guidance?	A23, A24
4. What new resources do State agencies need to ensure meaningful access to SNAP for individuals with LEP?	A26
5. Do SNAP State SNAP State agencies and local SNAP offices believe that they have the necessary resources to ensure that LEP individuals have access to SNAP services in accordance with Federal regulations and guidance?	A26
6. Does communication occur between State agencies and FNS regarding language access requirements?	A27
7. Do State agencies believe that they receive enough technical assistance and communications from FNS regarding language access requirements?	A28 and A29
8. Do State agencies share language assistance resources, language access plans or other guidance with each other?	A30
9. What types of communications are currently in place between States for language access guidance or language assistance resources?	A21
10. What other feedback do States have regarding language access?	A_END

Appendix B

Additional Tables

Objective 1: Describe how each State agency makes decisions about addressing LEP regulations and policies and civil rights regulations and policies as related to LEP

Table 1.1. Engagement of SNAP State agencies in language access policies

	SNAP State agencies
Four-factor analysis	
Yes, SNAP State agency has conducted four-factor analysis	65.3
No, SNAP State agency has NOT conducted a four-factor analysis	34.7
Language access plan	
Yes, SNAP State agency has a language access plan	69.4
No, SNAP State agency does NOT have a language access plan	30.6
Language Access Working Group	
Yes, SNAP State agency has a Language Access Working Group	36.7
No, SNAP State agency does NOT have a Language Access Working Group	63.3
Language access regulations that go beyond USDA implementing regulations	
Yes, SNAP State agency has language access regulations that go beyond USDA implementing regulations	16.3
No, SNAP State agency does not have language access regulations that go beyond USDA implementing regulations	83.7
Number of State agencies	49

Notes: There were no missing responses to this question. All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 1.2. Elements of SNAP State agency language access plans, for State agencies with approved plans

	States including element in Language Access Plan
Needs and capacity assessment	70.6
Interpreter language assistance services	94.1
Written translations	85.3
Policies and procedures related to each of the language access plan elements	85.3
Notification of the availability of free language services	94.1
Staff training	94.1
Assessing accessibility and quality	76.5
Other	11.8
Number of State agencies	34

Note: All data are represented in percentage of SNAP State agencies. There were some missing values for each of these response categories ranging from 2.9% to 5.9%.

Source: The SNAP Language Access Survey.

Table 1.3. Sources SNAP State agencies use to record and track how often they encounter LEP individuals

	SNAP State agencies using source
Application data	67.3
Eligibility data	49
Case management data	30.6
Customer service survey	6.1
Call center data	38.8
Data from other access points	20.4
Data on applicants requesting language access services	53.1
Other	6.1
SNAP State agency does not track how often they encounter LEP individuals	14.3
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 1.4. Types of oral language assistance services offered by States

	SNAP State agencies using oral language services
Interpreter service (this includes telephonic, internet/video, and/or in person services)	89.8
Bilingual speakers on staff	73.5
Interpreters on staff	22.4
Contracted interpreters	61.2
Language bank or dedicated pool of interpreters	6.1
Other	4.1
There is variation in the oral language services across counties within our State[1]	4.1
SNAP State agency does not offer any oral language services	0
Number of SNAP State agencies	49

[1] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, we calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 1.5. Methods SNAP State agencies use to determine the languages that bilingual staff and interpreters need to speak in offices

	SNAP State agencies
Assessing the presence of language groups using Federal data	55.6
Assessing the presence of language groups using State and local data	75
Consulting community and/or faith-based organizations	30.6
This activity is delegated to each county and, therefore, there is variation across counties within our State[1]	0.0
Other method	19.4
Number of SNAP State agencies	36

[1] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, the study team calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 1.6. State agency policies for frontline staff who encounter individuals with LEP who are proficient in a language not commonly used in the State

	Types of policies for frontline staff
Use an interpreter service (e.g. telephone, internet/video, in-person)	98
Use the individuals' family members or friends to help provide language services	42.9
Attempt to provide language services in a language other than the primary language of the LEP individual	14.3
Use picture aides	16.3
Use of I Speak language identification cards or posters	67.3
Use a tool like Google, Siri, Alexa, etc. to translate	12.2
Use bilingual staff who speak these languages	75.5
Other	2
SNAP State agency does not have a policy for this situation	0
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 1.7. State agency provisions for languages that are mostly spoken instead of written

	SNAP State agencies with provisions
Use an interpreter service (e.g. telephone, internet/video, in-person)	93.9
Use bilingual staff who speak these languages	57.1
Contract interpreters who speak these languages	46.9
Use these individuals' family members or friends as interpreters	32.7
Other	6.1
SNAP State agency does not provide any services listed above	0
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 1.8. States that offer language assistance services due to a court decision, complaint, investigation, or compliance review

	SNAP State agencies
Yes, our SNAP State agency offered language assistance because of a court decision, complaint, investigation or compliance review	44.9
No, our SNAP State agency did not offer language assistance because of a court decision, complaint, investigation or compliance review	51
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Objective 2: Describe the LEP policy landscape in each State

Table 2.1. Types of vital documents translated by States

	SNAP State agencies
Consent forms	75
Complaint forms	70.8
Notices of rights	85.4
Applications to participate in programs or activities	85.4
SNAP application forms	93.8
Notices to households	75
Other	22.9
SNAP State agency does not translate any vital documents	2.1
Missing	2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. Vital documents are 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.

Source: The SNAP Language Access Survey.

Table 2.2. Methods SNAP State agencies use to determine the languages to translate vital documents to

	SNAP State agencies using method
Assessing the presence of language groups using Federal data	47.8
Assessing the presence of language groups using State and local data	73.9
Consulting community and/or faith-based organizations	41.3
Activity delegated to each county	50
Other method	10.9
Missing	2.1
Number of SNAP State agencies	47

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. Vital documents are 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.

Source: The SNAP Language Access Survey.

Table 2.3. Languages offered for vital documents, recorded voice services, and multilingual online services

	Vital documents	Recorded voice services with English and non-English options	Multilingual online services
Chinese	34	10	39.4
French	8.5	3.3	9.1
Tagalog	6.4	3.3	0
Vietnamese	40.4	16.7	24.2
Korean	14.9	3.3	18.2
German	0	0	3
Russian	25.5	10	12.1
Arabic	31.9	3.3	30.3
Haitian	14.9	3.3	12.1
Portuguese	10.6	6.7	12.1
Farsi	0	0	6.1
Somali	12.8	6.7	9.1
Urdu	2.1	0	3
Hmong	6.4	6.7	3
Burmese	4.3	0	3
Amharic	4.3	0	3
Navajo	0	0	3
Bosnian	2.1	0	3
Marshallese	4.3	0	3
Number of SNAP State agencies	47	30	33

Notes: All data are represented in percentage of SNAP State agencies. States had the top 9 common languages (excluding Spanish and English) preloaded into the survey for questions a13 and a16. States were instructed to select the top five languages but may have chosen less than five languages, if applicable for their State agency.

Source: The SNAP Language Access Survey.

Table 2.4. How State agencies determine what mix of language services to provide

	SNAP State agencies
Reliance on outcome of four-factor analysis	49
Guidance from other State agencies	18.4
Guidance from the U.S. Department of Agriculture	67.3
Guidance from other Federal agencies	40.8
State policy	59.2
Other SNAP State agency	4.1
Community feedback	38.8
Other	28.6
SNAP State agency does not determine the mix of language services to provide	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.5. Reasons that SNAP State agencies translate vital documents for participants

	Consent forms	Complaint forms	Notice of rights	Applications to participate in programs	SNAP application form	Notices to Households
Unable to access or participate if translation unavailable	65.7	66.7	57.5	82.5	77.3	80
Termination from program if unable to understand the document	62.9	54.5	55	72.5	65.9	82.9
Could suffer significant harm if unable to understand the document	54.3	54.5	60	62.5	63.6	71.4
USDA provided translation guidance	65.7	75.8	77.5	75	79.5	77.1
Other SNAP agencies recommended translation	2.9	6.1	2.5	5	4.5	0
Community provided feedback on needed translation	37.1	39.4	35	35	45.5	40
Missing	2.8	2.9	2.4	2.4	2.2	2.8
Number of SNAP State agencies	36	34	41	41	45	36

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.6. Qualifications that SNAP State agencies use to evaluate interpreters, translators, and bilingual staff during the hiring process

	Interpreters and Translators	Bilingual Staff
Academic degrees	14.3	16.3
Certification	38.8	24.5
Work experience	16.3	16.3
Interview	20.4	32.7
Language test or assessment	34.7	36.7
Training attendance records	10.2	4.1
SNAP State agency does not evaluate qualifications	24.5	32.7
Evaluations of qualifications are done through the State's procurement process and contracts with vendors	22.4	n/a
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

n/a = not applicable. This category was created based on common answers that the States provided in the other specify for interpreters and translators. This was not a commonly specified answer for bilingual staff.

Table 2.7. Language assistance resources for applicants and participants to access online websites, portals, or applications

	SNAP State agencies using language assistance resource
Automated translation software is used for all online services	40
Automated translation software is used for some online services	57.1
Written translations of vital documents	65.3
Multilingual written translated notices of the right to receive competent oral interpretation, free of cost	53.1
Other	18.4
SNAP State agency does not offer language assistance resources to help LEP individuals access SNAP websites, web portals, or online applications	8.2
Number of SNAP State agencies[1]	49

[1] The number of SNAP State agencies for "Automated translation software is used for all online software" and "Automated translation software is used for some online services" is 15 since only respondent who answered question B16 = 1 received this response option.

Notes: The sample size for the rest of the response options is 49. All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.8. Requirements that SNAP State agencies incorporate into contracts and MOUs with sub-recipients

	SNAP State agencies incorporating requirements
Having a language access plan	31.9
Appointing a language access coordinator	10.6
Some other requirements	27.7
Working with sub-recipients is delegated to each county and, therefore, there is variation across counties within our State[1]	2.1
Not applicable – we do not work with subrecipients	10.6
No, we do not put any language access requirements in sub-recipient contracts	31.9
Missing	4.1
Number of SNAP State agencies	49

[1] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, we calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.9. Methods that SNAP State agencies use to determine whether frontline staff are providing the appropriate language assistance services to LEP applicants and participants

	SNAP State agencies incorporating requirements
Evaluations conducted by leaders of frontline staff	49
Conducts quality assurance of records kept by frontline staff	40.8
Feedback from LEP applicants/participants	55.1
Frontline staff self-evaluations	12.2
Frontline staff peer evaluations	2
Other	30.6
Frontline staff have not determined if the State is providing the appropriate language assistance services	8.2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.10. How SNAP State agencies translate content, materials, or services that are provided online

	SNAP State agencies
Automated translation software	30.6
FNS-provided translations of essential documents	24.5
Qualified human translators	69.4
Translated by contracted vendors	24.5
Other	2
SNAP State agency does not translate content, materials, or services that are provided online	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.11. How SNAP State agencies ensure translation accuracy and cultural competency

	SNAP State agencies
We check on the U.S. Department of Agriculture, FNS website for existing translated terminology	32.7
One staff person translates the document and another staff person reviews	16.3
Documents are reviewed to ensure that the language level is consistent in documents	38.8
Documents are reviewed by a translator or staff person fluent in the language	53.1
Contracted vendors perform these tasks to ensure translation accuracy and cultural competency	32.7
Other	6.1
Our State does not offer translated documents to LEP individuals	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.12. States that use multiple translations for languages with regional variation

	SNAP State agencies
Yes, SNAP State agency uses multiple translations for languages that have regional variation	18.4
No, SNAP State agency do not use multiple translations for languages that have regional variation	81.6
This activity is delegated to each county and, therefore, there is variation across counties within our States.[1]	0.0
Number of SNAP State agencies	49

[1] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, we calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 2.13. Methods that SNAP State agencies use to provide language services in unexpected situations

	SNAP State agencies
Use an interpreter service (e.g., telephone, Internet/video, in-person)	98
Use the individuals' family members or friends	44.9
Identify the language service needed and reschedule with individual when service is available	42.9
Attempt to provide language services in a language other than the language of the LEP individual	8.2
Use picture aides	10.2
Use of I Speak language identification cards or posters	65.3
Use a tool like Google, Siri, Alexa, etc. to translate	18.4
Use bilingual staff who speak these languages	61.2
Other	6.1
SNAP State agency does not provide language services in unexpected situations	0
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.14. SNAP State agencies that require individuals to sign a waiver of their right to free interpreter services when they use a family member or friend as an interpreter

	SNAP State agencies
Yes, SNAP State agency requires individual to sign a waiver of their right to free interpreter services	24.5
No, SNAP State agency does not require individuals to sign a waiver of their right to free interpreter services	75.5
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 2.15. SNAP State agency use of family, friends, and minor children as interpreters

	Family or friends	Children
For routine matters	38.8	10.2
During an emergency when no other interpretation is available	44.9	24.5
After an LEP individual has filled out a waiver to use an interpreter of their choosing	24.5	2
When filling out an application	34.7	2
During an interview	38.8	2
During all interactions with the LEP individual	42.9	2
Never	12.2	69.4
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.16. Frequency that frontline staff use family, friends, and children as interpreters

	Family and friends	Children
Never	12.2	63.3
Rarely	40.8	28.6
Sometimes	42.9	6.1
Usually	4.1	0.0
Always	0.0	0.0
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 2.17. How SNAP State agencies record the primary language spoken and/or the language assistance provided at the point of contact with LEP individuals

	SNAP State agencies
State agency has a written procedure for how frontline staff are to document the language assistance services provided to applicants and participants who require language assistance	75.5
Methods used for recording primary language at point of contact[1]	
Information is recorded in eligibility and/or case management system in a standardized data field	81.6
This information is recorded in eligibility and/or case management system in an open notes field	40.8
This information is shared via email or phone	10.2
Other	14.3
There is no standardized method to record language service needs	2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. 1States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 2.18. Methods of community feedback on language access policies, plans, and procedures

	SNAP State agencies
Meet with community leaders	22.4
Meet with community organizers	40.8
Collect feedback	42.9
Analyze data collected by community organizations	24.5
Other	16.3
SNAP State agency does not collect community feedback when updating language access procedures	18.4
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Objective 3: Describe the LEP operations landscape in each State

Table 3.1. Methods that frontline staff use to communicate verbally with LEP individuals

	SNAP State agencies
State always has bilingual staff available in person and by telephone	30.6
State uses on-staff interpreters	26.5
State uses contracted interpreters	59.2
State uses interpreters from advocacy organizations	16.3
Staff use a telephonic interpreter service	89.8
Family members or friends	38.8
Other	10.2
There are no services that frontline staff offer to verbally communicate with LEP individuals	0
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.2. How SNAP State agency staff and frontline staff conduct outreach to LEP communities about SNAP services

	SNAP State agency staff outreach	Frontline staff outreach
Posting signs in intake areas and other entry points	67.3	81.6
Distributing outreach documents about SNAP services	63.3	51
Working with community-based organizations and other stakeholders to inform LEP individuals of SNAP services	81.6	59.2
Using a telephone voice mail menu	28.6	36.7
Including notices in local newspapers in languages other than English	6.1	0
Providing notices on non-English–language radio and television stations about the available SNAP services and how to get them	16.3	6.1
Delivering presentations and/or notices to organizations in the community	32.7	22.4
Other	10.2	10.2
Staff do not conduct outreach to the LEP communities about SNAP services	8.2	4.1
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.3. Length of time to get translated documents and interpreters for applicants and participants

	Language is commonly spoken		Language is rarely encountered	
	Translated documents	Interpreters	Translated documents	Interpreters
One day or less	32.7	85.7	4.1	61.2
2 or 3 days	30.6	10.2	16.3	16.3
4 to 6 days	12.2	4.1	26.5	10.2
1 to 2 weeks	10.2	0.0	20.4	8.2
3 to 4 weeks	2	0.0	6.1	2
5 weeks more	0.0	0.0	4.1	2
State does not offer translated documents	10.2	0.0	18.4	0.0
Missing	2	0.0	4.1	0.0
Number of SNAP State agencies	49	49	49	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 3.4. Methods that States use to determine whether frontline staff are providing the appropriate language assistance services to LEP applicants and participants

	SNAP State agencies
Evaluations conducted by leaders of frontline staff	49
Conducts quality assurance of records kept by frontline staff	40.8
Feedback from LEP applicants/participants	55.1
Frontline staff self-evaluations	12.2
Frontline staff peer evaluations	2
Other	30.6
The State has not determined if frontline staff are providing the appropriate language assistance services	8.2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.5. How frontline staff are notified of an existing customer's needs for written or verbal language assistance services

	SNAP State agencies
Provided to the frontline staff via email or telephone	53.1
Recorded in the eligibility and/or case management systems	91.8
Other	22.4
Frontline staff are not notified	2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.6. States with a written procedure for how frontline staff determine whether an applicant or participant requires language assistance

	SNAP State agencies
Yes, the SNAP State agency provides a written procedure to frontline staff	75.5
No, the SNAP State agency does not provide written procedures to frontline staff	16.3
There is variation in these written procedures across counties within our State[1]	4.1
Missing	4.1
Number of SNAP State agencies	49

[1] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, we calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 3.7. Frequency that State or local agencies respond to requests for documents or interviews in languages they do not routinely encounter

	At least once every week	At least once every month	At least once every quarter	At least once every year	Never	Missing	Sample Size
How often does SNAP State agency respond to requests for translated materials	35.3	11.8	29.4	17.6	0.0	5.9	17
How often does SNAP State agency respond to requests for oral interpreter services	38.1	9.5	19.0	23.8	4.8	4.8	21

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 3.8. State agency procedures when frontline workers are unable to communicate with the participant in their language

	SNAP State agencies
Use an interpreter service (e.g., telephone, Internet/video, in-person)	98
Use the individuals' family members or friends to help provide language services	44.9
Identify the language service that is needed and reschedule with individual when service is available	42.9
Attempt to provide language services in a language other than the primary language of the LEP individual	14.3
Use picture aids	26.5
Use tools like Google, Siri, Alexa, etc. to translate	14.3
Use bilingual staff who speak these languages	63.3
Other	8.2
There is no policy for what frontline staff should do if they are unable to communicate with an LEP individual	0
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.9. Problems and challenges in working with LEP applicants and participants

	SNAP State agencies
Lack of funding	40.8
Not enough bilingual staff	49
Not have enough translated materials	36.7
There is not enough support for training	18.4
Not enough interpreters onsite to provide services	34.7
Not enough bilingual/multilingual staff onsite to provide services	46.9
Do not have access to interpreter services	2
Not enough support for oversight and quality assurance	22.4
Other	22.4
SNAP State agency has not experienced any challenges working with LEP individuals	16.3
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.10. How SNAP State agencies evaluate the qualifications of an advocacy organization's translators and interpreters

	SNAP State agencies
Academic degree(s) of organization's staff	4.1
Certification(s) of organization's staff	14.3
Work experience(s) of organization's staff	8.2
Interview(s) with organization's staff	6.1
Language test(s) or assessment(s) of organization's staff	0
Recommendation from organization leadership	4.1
Training attendance records	0
Other	6.1
SNAP State agency does not evaluate the qualifications of an advocacy organization's translators and interpreters	69.4
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 3.11. SNAP State agencies that allow exemptions for individuals with LEP if there are no frontline staff proficient in their primary language

	SNAP State agencies
Yes, SNAP State agency allows exemptions to LEP individuals if there are no frontline staff who are proficient in primary language	8.2
No, SNAP State agency does not allow exemptions to LEP individuals if there are no frontline staff who are proficient in primary language	85.7
Missing	6.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 3.12. How LEP participants can share their feedback or concerns about the agency's language assistance services or lack thereof with SNAP State agencies

	SNAP State agencies
Feedback section on website	30.6
Feedback form, available at local SNAP offices	28.6
Frontline staff submit feedback they receive from individuals	65.3
Feedback section at the end of the application	6.1
Through surveys	16.3
Call the toll-free number or email	57.1
Other	16.3
SNAP State agency does not collect feedback	6.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Objective 4: Describe how State agencies (frontline staff and other service providers) are trained to work with LEP participants

Table 4.1. SNAP State agencies that provide frontline staff with an annual training on civil rights and/or other types of training on language access procedures

	SNAP State agencies	Missing
Frontline staff receive annual training on civil rights	93.9	2
Frontline staff receive other types of training on language access procedures	67.3	0
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 4.2. How SNAP State agencies inform frontline staff of changes in language access policies, plans, and procedures

	SNAP State agencies
Virtual meetings	67.3
In-person meetings	53.1
Program office or department's intranet site	65.3
SNAP external website	8.2
Email updates	69.4
Operational memos	71.4
Phone calls	4.1
Through trainings	14.3
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 4.3. How staff give feedback on challenges with implementing language access policies, plans, and procedures

	SNAP State agencies
Frontline staff complete surveys about their experience	6.1
Supervisors observe frontline staff interactions with LEP individuals	49
Through group discussions or meetings with frontline staff	57.1
Frontline staff have one-on-one conversations with supervisors	44.9
Frontline staff provide ad hoc feedback	61.2
Other	14.3
No feedback is collected from frontline staff	12.2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 4.4. How State agencies train SNAP, SNAP-Ed, and D-SNAP staff on language access policies, plans, and procedures

	SNAP State agencies
Frontline staff[1] (N=45)	
Online trainings	84.4
Conferences	9.3
Group in-person trainings	37.2
Group virtual trainings	32.6
One-on-one virtual trainings	25
On-the-job training	81.4
Other	11.6
SNAP-Ed staff (N=49)	
Online trainings	40.4
Conferences	10.6
Group in-person trainings	8.5
Group virtual trainings	10.6
One-on-one virtual trainings	4.3
On-the-job trainings	4.3
Other	23.4
There is variation in trainings about Title VI to SNAP-Ed contractors across counties within our State[2]	0
There is no training provided	25.5
Missing	4.1
D-SNAP staff (N=24)	
Online trainings	58.3
Conferences	0
Group in-person trainings	41.7
Group virtual trainings	33.3
One-on-one virtual trainings	4.2
On-the-job trainings	37.5
Other	16.7
There is variation in trainings about Title VI to D-SNAP providers across counties within our State[2]	0
There is no training provided	4.2
Missing	7.7

[1] There were two cases that completed the hard copy and entered data for question D5 even though the skip logic indicated that they should not have answered D5 because they answered D4 = 0. When reviewing these answers, the study team thought we should just keep their answers at D5 since D4 and D5 seem unrelated.

[2] Only the county-administered SNAP States that indicated that there is variation in their policies received this response option. To show the percentage of responding States where this is relevant, we calculated this out of the total number of SNAP agencies.

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 4.5. Frontline staff training on how to arrange telephone, web-based or video, and in-person interpretation services

	Yes	No	Not applicable, my State does not have this service
Telephone interpreters	95.9	2	2
Web-based or video interpreters	34.7	16.3	42.9
In-person interpreters	69.4	10.2	18.4
Number of SNAP State agencies	49	49	49

Notes: All data are represented in percentage of SNAP State agencies. There was 6.1% missing response to "web-based or video interpreters and there was 2.0% missing response to "in-person interpreters."

Source: The SNAP Language Access Survey.

Table 4.6. Trainings that SNAP State agencies provide for bilingual staff or staff who provide interpretation services or translations

	SNAP State agencies
Professional training courses for bilinguals, interpreters, and translators	2.4
Training on language access policy and procedure	56.1
Having a third-party evaluator test the staff's language skills	22
Our SNAP State agency does not provide training for bilingual staff who provide interpretation services or translations	14.3
Other	22
Missing	16.3
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 4.7. Processes for States to prioritize hiring caseworkers and other frontline staff who speak languages other than English

	Not at all important	Slightly important	Important	Fairly important	Very important
When hiring caseworkers and other frontline staff how important is it that they speak a language other than English?	24.5	24.5	26.5	10.2	14.3

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. The sample size for this question is 49.

Source: The SNAP Language Access Survey.

Table 4.8. How SNAP State agencies inform SNAP E&T providers and SNAP-Ed contractors of Title VI and their language access requirements

	SNAP State agencies
SNAP E&T providers (N=49)	
Virtual meetings	72.3
In-person meetings	51.1
SNAP *internal* website	6.4
SNAP *external* website	19.1
Email updates	51.1
Updates sent by mail	23.4
Phone calls	36.2
Other	38.3
SNAP State agency does not have a way to inform SNAP E&T providers of Title VI and language access requirements	4.3
Missing	4.1
SNAP-Ed contractors (N=49)	
Virtual meetings	57.4
In-person meetings	51.1
SNAP *internal* website	17
SNAP *external* website	23.4
Email updates	59.6
Updates sent by mail	0.0
Phone calls to SNAP-Ed providers	17
Through contractual agreements	19.1
Other	23.4
SNAP State agency does not have a way to inform SNAP-Ed contractors of Title VI and language access requirements	2.1
Missing	4.1

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 4.9. SNAP State agencies that provide training to SNAP E&T providers about Title VI and their language access requirements

	SNAP State agencies
Yes, the SNAP State agency provides the training	44.9
No training provided	14.3
Policy or Guidance gives local SNAP offices or E&T providers flexibility	36.7
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 4.10. SNAP State agencies that require SNAP-Ed contractors to provide translated materials and qualified interpreters to LEP individuals

	SNAP State agencies
Translated materials (N=49)	
Yes, SNAP State agency requires SNAP-Ed contractors to provide translated materials	69.4
No, SNAP State agency does NOT require SNAP-Ed contractors to provide translated materials	20.4
Missing	10.2
Qualified interpreters (N=49)	
Yes, SNAP State agency requires SNAP-Ed contractors to provide qualified interpreters	65.3
No, SNAP State agency does NOT require SNAP-Ed contractors to provide qualified interpreters	28.6
Missing	6.1

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 4.11. States with SNAP-Ed contractors that offer SNAP-Ed documents in a language other than English

	SNAP State agencies
SNAP-Ed contractors offer SNAP-Ed documents in a language other than English	85.7
SNAP-Ed contractors do NOT offer SNAP-Ed documents in a language other than English	10.2
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Objective 5: Describe how SNAP State agencies implement the language access requirements within the Federal-State Agreement during the pre-award and post-award processes to ensure meaningful

Table 5.1. SNAP State agencies that have a language access coordinator and whether they are responsible for developing a language access plan

	SNAP State agencies
Language access coordinator	
Yes, SNAP State agency has a language access coordinator	55.1
No, SNAP State agency does not have a language access coordinator	42.9
Missing	2
Number of State agencies	49
Language access coordinator responsible for developing a language access plan	
Yes, language access coordinator is responsible for developing a language access plan	81.5
No, language access coordinator is NOT responsible for developing a language access plan	18.5
Number of State agencies	27

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Objective 6: Describe the E&T landscape for LEP participants in each State

Table 6.1. SNAP State agencies or SNAP E&T providers that offer ESL classes as an E&T component

	SNAP State agencies
Offers ESL class as an E&T component	75.5
Does not offer ESL class as an E&T component	20.4
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 6.2. State or provider partnerships for ESL classes as an E&T component

	SNAP State agencies
Workforce Investment and Opportunity Act Title II programs	68.8
D-SNAP program in State	6.3
SNAP-Ed program in State	9.4
TANF workforce programs	37.5
Other State LEP programs	37.5
Other	28.1
Missing	17.9
Number of SNAP State agencies	39

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.3. SNAP E&T providers that offer services in a language other than English

	SNAP State agencies
SNAP E&T providers offer services in a language other than English	81.6
SNAP E&T providers NOT offer services in a language other than English	12.2
Missing	6.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 6.4. How State agencies determine what languages to provide SNAP E&T services in

	SNAP State agencies
By assessing the presence of language groups in the service area using Federal data	10.6
By assessing the presence of language groups in the service area using State and local data	27.7
By consulting community and/or faith-based organizations that serve and work with LEP communities in the service area	8.5
Policy or guidance gives local SNAP offices or E&T providers flexibility in how they determine what languages SNAP E&T services are provided in	34
Other	14.9
SNAP State agency does not determine in which language to provide SNAP E&T services	21.3
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.5. How SNAP E&T services offered in other languages differ from those offered in English

	SNAP State agencies
Fewer service options	25.5
More individualized support	25.5
Fewer community college classes	10.6
Limited staff support	10.6
Flexibility in guidelines for case staff	8.5
Only offered at select locations	21.3
There are no differences from what is offered in English	25.5
Other	21.3
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.6. How staff conduct outreach to LEP communities about SNAP E&T services

	SNAP State agencies
Outreach conducted in the same way as it is for regular SNAP services (n=49)	
Yes, outreach about SNAP E&T services to LEP individuals is conducted the same as regular SNAP services	81.6
No, outreach about SNAP E&T services is to LEP individuals is NOT conducted the same as regular SNAP services	14.3
Missing	4.1
Methods that staff in State use to conduct outreach to LEP communities about SNAP E&T services [1, 2] (n=9)	
Posting signs in intake areas and other entry points	28.6
Distributing outreach documents about SNAP services	14.3
Working with community-based organizations and other stakeholders to inform LEP individuals of SNAP services	28.6
Using a telephone voice mail menu	0
Including notices in local newspapers in languages other than English	0
Providing notices on non-English–language radio and television stations about the available SNAP services and how to get them	0
Delivering presentations and/or notices to organizations in the community	0
Other	0
Staff in the State have not conducted outreach to the LEP communities about SNAP E&T services	57.1
Missing	22.2

[1] Only State agencies that selected E5 = 0 received this question.

[2] States were allowed to select multiple response options.

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 6.7. SNAP State agencies that mandate SNAP E&T participation and their exemption policies

	SNAP State agencies
Mandating SNAP E&T participation (N=49)	
Yes, SNAP State agency mandates SNAP E&T participation	12.2
No, SNAP State agency does NOT mandate SNAP E&T participation	81.6
Policy or guidance gives local SNAP offices or E&T providers flexibility in whether they mandate SNAP E&T participation	2
Missing	4.1
Exemption policies (N=8)[1]	
States exempting all LEP individuals	0.0
States exempting some LEP individuals if they cannot serve the language they speak	50.0
States do not exempt any LEP individuals from SNAP E&T participation	25.0
Missing	25.0
Number of SNAP State agencies	8

Notes: All data are represented in percentage of SNAP State agencies. 1States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.8. How SNAP State agencies or SNAP E&T providers identify individuals with LEP

	SNAP State agencies
Assume limited English proficiency if communication seems impaired	16.7
Respond to individual requests for language assistance services	83.3
The non-English speaker or LEP individual self-identifies as LEP	83.3
Ask open-ended questions to determine language proficiency on the telephone or in person	16.7
Use of I Speak language identification cards or posters	50
Based on written material submitted to the agency	16.7
We do not identify non-English speakers or LEP individuals	0
Other	16.7
Missing	25
Number of SNAP State agencies	8

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.9. How SNAP State agencies or SNAP E&T providers place individuals with LEP in an appropriate component[1]

	SNAP State agencies
Done at the case manager's discretion	50
Designating specific components as appropriate for LEP individuals	50
Conducting an intake assessment	66.7
Developing an individual employment for LEP individuals	66.7
Other	16.7
Missing	25
Number of SNAP State agencies	8

[1] Components may include things like supervised job search, job search training, education programs, self-employment training, workfare, job retention, etc.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 6.10. SNAP State agencies that use good cause to protect individuals with LEP from adverse action if they cannot participate in programs because of language barriers

	SNAP State agencies
SNAP State agencies use "good cause"	50
SNAP State agencies do NOT use "good cause"	0.0
Missing	50
Number of SNAP State agencies	4

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 6.11. How SNAP State agencies or SNAP E&T providers accommodate individuals with LEP who need to be placed in a SNAP E&T component

	SNAP State agencies
LEP individuals are not placed in certain components if the provider cannot accommodate the language need	44.4
We provide mostly case management services in their language	8.3
We provide mostly job search assistance in their language	8.3
LEP individuals are referred to ESL classes	61.1
LEP individuals are exempt from mandatory SNAP E&T	13.9
LEP individuals are referred to specific partners that offer components in their language	50
Other	25
Missing	26.5
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Objective 7: Describe how LEP policies function under D-SNAP in each State

Table 7.1. SNAP State agencies that used D-SNAP less than two years ago, two to five years ago, and more than five years ago

	SNAP State agencies
Less than two years ago	26.5
Two to five years ago	22.4
Greater than five years ago	46.9
Missing	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 7.2. SNAP State agencies offer in-person, telephone, or online D-SNAP applications

	SNAP State agencies
In-person D-SNAP applications	100
Telephone D-SNAP applications	56.5
Online D-SNAP applications	39.1
Missing	4.2
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 7.3. How SNAP State agencies provide language assistance during D-SNAPs to applicants who apply in person, via telephone, or online

	SNAP State agencies
In person (N=23)[1]	
Pre-recorded informational messages are broadcasted in multiple languages at the application site	0
Translation and interpretation services are available on site	60.9
Translation and interpretation services are available virtually	91.3
Written translated materials are available on site	56.5
Other	8.7
Telephone (N=13)	
Telephone translation and interpretation services available	100
Pre-recorded informational messages are broadcast in multiple languages	0
Other	7.7
Online (N=9)	
Online translation and interpretation services available	66.7
Video services provided by SNAP State agency	11.1
Written translated materials are available online	55.6
Other	22.2

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section. There was one State that did not answer question F2 and so they were skipped out of question F3.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 7.4. States that offer D-SNAP documents in languages other than English

	SNAP State agencies
D-SNAP documents offered in languages other than English	83.3
D-SNAP documents are NOT offered in languages other than English	16.6
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 7.5. How State agencies decide which languages to translate D-SNAP materials into

	SNAP State agencies
The SNAP State agency collects demographic information of potential individuals before a disaster	37.5
The SNAP State agency has an up-to-date, formal pre-disaster database in place	0
The SNAP State agency translates materials into the major languages spoken by non-English speakers in the State	41.7
The same process used for the regular SNAP State program is used for D-SNAP	79.2
Other	12.5
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 7.6. SNAP State agencies with necessary agreements, contracts, and MOUs to onboard qualified interpreters when needed for D-SNAP

	SNAP State agencies
Qualified interpreters are available for D-SNAP when needed	79.1
Qualified interpreters are NOT available for D-SNAP when needed	20.8
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 7.7. How SNAP State agencies decide for which languages to reserve qualified interpreters

	SNAP State agencies
The SNAP State agency collects demographic information of potential individuals before a disaster	22.2
The SNAP State agency has an up-to-date, formal pre-disaster database in place	0
We partner with an organization or service that can provide qualified interpreters when needed	38.9
The same process used for the regular SNAP State program is used for D-SNAP	72.2
Other	5.6
Missing	5.3
Number of SNAP State agencies[1]	19

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 7.8. Strategies SNAP State agencies use when language services are unavailable in the language of the individual with LEP

	SNAP State agencies
Refer the individual to other organizations or resources	16.7
Let the individual know your agency can not help them at this time	0
Work with the individual but not in their preferred language - it is up to them to get the materials translated by a friend or family member	8.3
Find someone who can interpret or translate and offer their services to the individual free of charge	79.2
SNAP State agency uses vendor contracts with languages services to provide the needed language	14.9
Other	8.3
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 7.9. How SNAP State agencies decide which languages D-SNAP outreach should be in

	SNAP State agencies
The SNAP State agency collects demographic information of potential individuals before a disaster	37.5
The SNAP State agency has an up-to-date, formal pre-disaster database in place	12.5
The SNAP State agency translates materials into the major languages spoken by non-English speakers in the State	29.2
The same process is used for D-SNAP as is used for the regular SNAP program	79.2
Other	12.5
Number of SNAP State agencies[1]	24

[1] Only the State agencies that answered that they had to use D-SNAP within the last 5 years, received the questions in this section. There were two States that did not complete this section, but they were treated as logical skips since they did not screen into this section.

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Objective 8: Describe how civil rights complaints are addressed

Table 8.1. How SNAP State agencies inform people they can file complaints about language access services directly with the USDA

	SNAP State agencies
Application forms include FNS-approved nondiscrimination Statement	95.7
Complaint forms include FNS-approved nondiscrimination Statement	68.1
Staff share this information verbally with individuals	66
Notices or signs are posted in the office	74.5
USDA And Justice for All, or an FNS-approved substitute, is in the office	93.6
SNAP State websites show this information	80.9
This information is included in a telephone voice mail menu	10.6
Other	12.8
The SNAP State agency does not do this	0
Missing	4.1
Number of SNAP State agencies	49

Notes: Respondents could select all the answers that applied for their SNAP State agency and so percentages do not always sum to 100%. All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 8.2. SNAP State agencies with an FNS Civil Rights Division–approved process for handling civil rights complaints related to language access and national origin discrimination and number of findings of noncompliance

	SNAP State agencies
Has an FNS Civil Rights Division- approved process	
Yes, SNAP State agency has an approved process for handling civil rights complaints	83.7
No, SNAP State agency does NOT have an approved process for handling civil rights complaints	12.2
Missing	4.1
Has there been findings of noncompliance for Civil Rights language access requirements (N=49)	
Yes, in the past 5 years has there been any findings of noncompliance for Civil Rights language access requirements	16.3
No, in the past 5 years has there has NOT been any findings of noncompliance for Civil Rights language access requirements	79.6
Missing	4.1
Number of findings of noncompliance (N=10)	
1-2	30
3-5	30
5-10	0.0
More than 10	20
Missing	20
Corrective actions to resolve findings (N=10)	
Yes, SNAP State agency took corrective actions	80
No, SNAP State agency did not take corrective actions	0.0
Missing	20

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 8.3. SNAP State agencies that received any civil rights complaints in the past 12 months about language access

	SNAP State agencies
Received complaints specifically about language access (N=49)	
Yes, State agency received complaints specifically about language access	12.2
No, State agency did NOT receive complaints specifically about language access	83.7
Missing	4.1
Number of civil rights complaints about language access services (N=8)	
Range[1]	0-1
Missing	50

[1] Only two States said that they had 1 civil rights complaint related to language access services. Two other States said that they had 0 civil rights complaints related to language access services. Four additional States did not answer this question. It is possible that some States did not know the answer or did not feel the complaint was related to their State not providing language access services.

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 8.4. Types of allegations raised in civil rights complaints that States received over the past 12 months

	SNAP State agencies
Failed to provide a qualified interpreter or translated materials	60
Online application system was not available in the most commonly used languages besides English	0
Recipient was not notified of rights	0
Discrimination against a member of a State-specific protected class	40
Reasonable steps not being taken to provide meaningful access to SNAP	40
Incident with staff member(s)	40
Denial of needed benefits and services	40
Delay in service delivery	60
Wrong services were provided	20
Ineffective services were provided	60
Voicemail menus on customer service lines are not accessible to persons with LEP	20
Other	20
Missing	37.5
Number of SNAP State agencies	8

Notes: All data are represented in percentage of SNAP State agencies. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 8.5. SNAP State agency informing FNS Civil Rights Division of civil rights complaints on language access before initiating allegation investigation

	SNAP State agencies
Yes, we notified the FNS Civil Rights Division of all complaints	25.0
We notified the FNS Civil Rights Divisions of some complaints	12.5
No, we did not notify the FNS Civil Rights Division about any of the complaints	37.5
Missing	25.0
Number of SNAP State agencies	8

Notes: All data are represented in percentage of SNAP State agencies. We do not include tables for survey questions C10 and C11, which ask about the number of civil rights complaints about language access services in the last 12 months that resulted in a determination of noncompliance or unlawful discrimination and the corrective actions taken, because there were no States that indicated that there were any of these situations.

Source: The SNAP Language Access Survey.

Objective 9: Collect State agency perceptions about Federal LEP policies, Federal regulations, and statutes

Table 9.1. Whether SNAP State agency staff understand Title VI and Federal language access regulations and guidance

	SNAP State agencies
Not at all	2
A little	16.3
Somewhat	42.9
A great deal	38.8
Number of NSAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 9.2. Additional information about Title VI and the Federal language access regulations and guidance that FNS could provide to SNAP State agencies

	SNAP State agencies
Title VI and Federal regulations and guidance	61.2
Examples of best practices in how other SNAP agencies implement Title VI and Federal regulations and guidance	77.6
Information on how to implement Title VI and Federal regulations and guidance for SNAP E&T, SNAP-Ed, and D-SNAP	63.3
More detailed guidance on implementing Title VI and Federal regulations	53.1
Other	12.2
No other information about Title VI and Federal language regulations and guidance is needed	10.2
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 9.3. Whether SNAP State agencies have the resources to implement language access plans, policies, and procedures to meet Federal and State regulations and guidance

	Federal regulations and guidance	State regulations and guidance
Strongly agree	18.4	20.4
Agree	59.2	55.1
Disagree	16.3	22.4
Strongly disagree	6.1	2
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 9.4. Additional resources SNAP State agencies need to ensure individuals with LEP have meaningful access to SNAP

	SNAP State agencies
Increased funding	69.4
More staffing	65.3
Translated materials	59.2
Support for agency staff training	53.1
External resources	36.7
Translator and interpreter services	22.4
Support for oversight and quality assurance	34.7
No additional resources needed	6.1
Other	4.1
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 9.5. Whether SNAP State agencies receive enough technical assistance and communications from FNS on language access requirements

	Receives enough technical assistance	Receives enough communications
Strongly agree	2	6.1
Agree	65.3	55.1
Disagree	32.7	36.7
Strongly disagree	0.0	2
Number of SNAP State agencies	49	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question.

Source: The SNAP Language Access Survey.

Table 9.6. SNAP State agencies that share language assistance resources with SNAP agencies in other States or other agencies within the State

	SNAP State agencies
Yes, we share resources with SNAP agencies in other States	14.3
Yes, we share resources with other agencies within the State	46.9
No	44.9
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to this question. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 9.7. Whether SNAP State agencies communicate about language access requirements and resources

	SNAP State agencies
Communication with FNS	
Yes, SNAP State agency regularly communicates with FNS about language access requirements	46.9
No, SNAP State agency does NOT regularly communicate with FNS about language access requirements	53.1
Sharing of language assistance resources	
Yes, SNAP State agency shares language assistance resources, language access plans, or other guidance with other SNAP agencies	22.4
No, SNAP State agency does NOT share language assistance resources, language access plan or other guidance with other SNAP agencies	77.6
Number of SNAP State agencies	49

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Breakouts by SNAP caseload size and SNAP administration type

Table 10.1. SNAP State agencies that have conducted a four-factor analysis, by type of SNAP administration

	State-administered	State-supervised/County-administered
States that conducted a four-factor analysis	64.1	70
States that did not conduct a four-factor analysis	35.9	30
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.2. SNAP State agencies that have conducted a four-factor analysis, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States that conducted a four-factor analysis	66.7	50	77.8
States that did not conduct a four-factor analysis	33.3	50	22.2
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.3. SNAP State agencies with a language access plan, by type of SNAP administration

	State-administered	County-administered
States that have a Language Access Plan	74.4	50
States that do not have a Language Access Plan	25.6	50
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.4. SNAP State agencies with a language access plan, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States that have a Language Access Plan	73.3	50	83.3
States that do not have a Language Access Plan	26.7	50	16.7
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.5. SNAP State agencies with a language access coordinator who develops the language access plan, by type of administration

	State-administered	County-administered
States that have a Language Access Coordinator	77.3	100.0
States that do not have a Language Access Coordinator	22.7	0
Missing	0	0
Number of SNAP State agencies	22	5

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.6. SNAP State agencies with a language access coordinator who develops a language access plan, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States that have a Language Access Coordinator	85.7	88.9	72.7
States that do not have a Language Access Coordinator	14.2	11.1	27.3
Number of SNAP State agencies	7	9	11

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.7. SNAP State agencies with a language access working group, by type of administration

	State-administered	County-administered
States that have a Language Access Working Group	38.5	30
States that do not have a Language Access Working Group	61.5	70
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.8. SNAP State agencies with a language access working group, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States that have a Language Access Working Group	33.3	25	50
States that do not have a Language Access Working Group	66.7	75	50
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.9. SNAP State agencies that permit the use of children as interpreters, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
For routine matters	6.7	18.8	5.6
During an emergency when no other interpretation is available	20	31.3	22.2
After an LEP individual has filled out a waiver to use an interpreter of their choosing	6.7	0	0
When filling out an application	0	6.3	0
During an interview	0	6.3	0
During all interactions with the LEP individual	0	6.3	0
States that do not permit the use of children as interpreters under any circumstance	66.7	62.5	77.8
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions. States were allowed to select multiple response options.

Source: The SNAP Language Access Survey.

Table 10.10. Frequency that SNAP State agencies use family, friends, and children as interpreters, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
Family and friends			
Always	0.0	0.0	0.0
Usually	13.3	0.0	0.0
Sometimes	53.3	37.5	38.9
Rarely	26.7	37.5	55.6
Never	6.7	25	5.6
Children			
Always	0.0	0.0	0.0
Usually	0.0	0.0	0.0
Sometimes	6.7	6.3	5.6
Rarely	20.0	37.5	27.8
Never	73.3	50.0	66.7
Missing	0.0	6.3	0.0
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies.

Source: The SNAP Language Access Survey.

Table 10.11. SNAP State agency communication with FNS about language access requirements, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States regularly communicate with FNS	53.3	31.3	55.6
States do not regularly communicate with FNS	46.7	68.8	44.4
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.12. SNAP State agency perspectives on FNS technical assistance for language access requirements, by SNAP caseload size

	Small SNAP caseload	Medium SNAP caseload	Large SNAP caseload
States **strongly agree** or **agree** that they receive enough technical assistance from FNS about language access requirements	80	62.5	61.1
States **strongly disagree** or **disagree** that they receive enough technical assistance from FNS about language access requirements	20	37.5	38.9
Number of SNAP State agencies	15	16	18

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Table 10.13. SNAP State agencies providing other types of training on language access procedures to frontline staff, by type of administration

	State-administered	County-administered
State agencies that provide other types of training on language access procedures	64.1	80
State agencies that do not provide other types of training on language access procedures	35.9	20
Number of SNAP State agencies	39	10

Notes: All data are represented in percentage of SNAP State agencies. There were no missing responses to these questions.

Source: The SNAP Language Access Survey.

Appendix C

Study Methods

Summary of Methods

Survey and document review

SNAP Language Access Survey

The SNAP Language Access Survey collected data on the State requirements and guidance related to language access and how SNAP State agencies ensure that individuals with LEP have meaningful access to SNAP. The survey asked 123 questions, which were divided into seven sections: (1) SNAP language access policy, (2) SNAP language access procedures, (3) civil rights processes, (4) SNAP language access training, (5) SNAP E&T language access procedures, (6) D-SNAP language access procedures, and (7) SNAP-Ed language access procedures.

The study team conducted the web-based survey by using Forsta software. The survey was available only in English and was estimated to take about two hours for respondents to complete. To reduce survey burden, SNAP administrators could assign sections for different members of their organization to complete.

The study team incorporated the initial request for internal documents into the survey. At the end of the first four sections, the survey asked whether the State agency could send us the URL of any publicly available documents. If a State agency could provide us with the URL, then the study team would try and locate the relevant documents. If a State agency could not provide a URL, then the study team asked whether the agency could send the documents by email or secure file transfer. The documentation request was estimated to take State agencies about 30 minutes to complete.

Training

The study team conducted the survey training in June 2023 during two, 90-minute sessions. The study team trained one Mathematica research associate to conduct the survey data collection. The research associate participated in a telephone interview simulation exercise. The study team began data collection thereafter and met weekly throughout the data collection period.

Data collection

The study team fielded the survey from July 2023 to November 2023. FNS sent an introductory email to SNAP State directors in early July, which kicked off the data collection. To ensure the highest possible response rate, the study team followed up with State agencies via email and telephone on a semimonthly basis. The study team sent nine reminder emails and conducted eight reminder calls throughout the data collection period. SNAP State agencies could complete the survey by web, fillable PDF or over the phone.

Throughout the study, the study team generated daily and weekly reports to track the status of each State survey and closely monitor response rates. Once State agencies returned the survey, the study team reviewed the data files for completeness. If a State submitted its survey via the fillable PDF, one study team member entered the survey responses and another team member checked the data entry for accuracy and completeness.

SNAP LEP Census Data Analysis

We used the American Community Survey, 5-year estimates/Puerto Rico Community Survey, vintage 2020, to answer the following questions:

1. What is the number and proportion of LEP individuals in each State or Territory?
    a. What is the number and proportion of LEP individuals at or under 130% of the Federal Poverty Line?
1. What is the number and percentage of the population aged 5-17, and 18 years or older who are at or under 130% of the Federal Poverty Line who are LEP in each State?
2. What are the top languages spoken at home among LEP individuals at or under 130% FPL in each State?
3. What are the top languages spoken at home among LEP individuals in each county in each State?
4. What is the gender, citizenship, education, and race breakdowns for LEP individuals at or under 130% FPL in each State?

Data Sources:

For 50 States, DC, and Puerto Rico: The American Community Survey, 5-year estimates/Puerto Rico Community Survey, Vintage 2020, microdata accessed through data.census.gov/mdat.

For American Samoa, Guam, the Northern Mariana Islands, or the US Virgin Islands: Decennial Census of Island Areas, 2020. Table DP2 accessed through census.data.gov.[14]

Calculations were performed in Excel.

Table 1a: LEP in each State (Q1)

Variables: ENG (Ability to speak English), Values 2 (well), 3 (not well), and 4 (not at all)
AGEP (Age), 5 and up (ability to speak English is not available for people under 5 years old)

Geography: All States.

Table 1b: LEP at or under 130% of FPL in each state

Variables: ENG (Ability to speak English), Values 2 (well) ,3 (not well), and 4 (not at all)
AGEP (Age), 5 and up (ability to speak English not available for those under 5 years old)
POVPIP (income-to-poverty ratio), set to 130 and below.

Geography: All States.

[14] The American Community Survey is not administered in the US Virgin Islands, American Samoa, Guam, or the Commonwealth of the Northern Mariana Islands. Relevant questions were included in the Decennial Census of Island Areas, most recently carried out in 2020. Only summary tables are available for these geographies for this time period; data cannot be further refined.

Table 2: LEP at or below 130% FPL by age groups

Variables: ENG (Ability to speak English), Values 2 (well) ,3 (not well), and 4 (not at all)
AGEP (Age), 5 to 17 (ability to speak English not available for those under 5 years old), 18-99
POVPIP (income-to-poverty ratio), set to 130 and below.

Geography: All States.

Table 3: Languages other than English spoken at home, for those at or under 130% FPL

Variables: ENG (Ability to speak English), Values 2 (well) ,3 (not well), and 4 (not at all)
AGEP (Age), 5 to 17 (ability to speak English not available for those under 5 years old), 18-99
POVPIP (income-to-poverty ratio), set to 130 and below.
LANP (Language other than English spoken at home)

Geography: All states

Formatting: Highlight top 10 languages for each State

Note: Chinese, Mandarin, and Cantonese combined into a singled broad "Chinese" category

Table 4: Island areas data

The population 5 years and over
The number and percentage who are LEP by age groups (5-17, 18-64, 65 and over)
Share of population over 5 that speaks a language other than English at home
Top languages spoken at home by LEPs

Table 5: Gender, citizenship, education level, and race/ethnicity for LEPs under 130% FPL

Variables: ENG (Ability to speak English), Values 2 (well) ,3 (not well), and 4 (not at all)
AGEP (Age), 5 and up (ability to speak English not available for those under 5 years old), 18 and up for Education level
POVPIP (income-to-poverty ratio), set to 130 and below.
LANP (Language other than English spoken at home)
SEX: Male/Female
CIT: Citizenship (Citizen/Noncitizen)
SCHL: Education level, recoded into four groups: Less than high school, High school diploma or GED, some college including an Associate's degree, and Bachelor's degree or higher
HISP: Detailed Hispanic origin, recoded into Hispanic/Non-Hispanic
RAC1P: Race (Native American and Alaska Native categories combined)
Note: Hispanic Origin and Race are combined in the table, see "notes on variables" below.

Geography: All states

Formatting: Top ten states by share of each race/ethnic group are highlighted in green.

Notes on variables:

ENG (Ability to speak English): data not available for those under 5.

Values of interest: 2 (Well) 3 (Not well) and 4 (Not at all) (LEP defined as anything less than "very well")

AGEP (Age): top coded to 99

POVPIP (Poverty-to-Income ratio): Data is restricted to those at or below 130% of the Federal Poverty Line (FPL) for most tables, as that is a broad proxy for SNAP eligibility

LANP (Language other than English spoken at home): Reports Chinese, Cantonese, and Mandarin as separate languages, we have combined them into one broad "Chinese" language category in table 3 following the conventions of New York State and New York City.

SEX: Only male and female options, no nonbinary or other sex/gender identification

CIT: recoded into citizen (1 - Born in the US, 2 – Born in a US territory, 3 – Born abroad to American parents, 4 – naturalized) and noncitizen (5 – Not a citizen of the US).

SCHL: Education, recoded into four categories: Less than high school, High school diploma or GED, some college including an Associate's degree, and Bachelor's degree or higher (there are 25 options for this variable for every grade level and university degree).

HISP: Detailed Hispanic origin, recoded into Hispanic/Nonhispanic

RAC1P: Race. American Indian alone (3), Alaska Native alone (4), and American Indian and Alaska Native tribes specified (5) combined into American Indian/Alaska Native.

For Race and Ethnicity in Table 5, HISP and RAC1P have been combined so that anyone indicating Hispanic origin is coded as Hispanic/Latinix regardless of their racial identification, and all other racial categories are for Nonhispanic only.

The Census and the ACS data used for these analyses ask about race and ethnicity in two separate questions ("are you Hispanic/Latino" and "what is your race?"). Hispanic is not listed as a race; users are instructed that Hispanic is not considered a race that they should not write it under "other."

Research conducted by the Census Bureau and Pew Research found that many of those who identify as Hispanic select "some other race" in the race question because they see Hispanic as their race. The research shows that combining the questions yields better results (people are able to select all that apply). (See https://www2.census.gov/about/partners/cic/conference/raceandethnicty_rios.pdf and https://www.pewresearch.org/social-trends/2021/05/14/black-and-hispanic-americans-see-their-origins-as-central-to-who-they-are-less-so-for-white-adults).

On March 28, 2024, the US Office of Management and Budget updated standards for collecting race and ethnicity data and will require a combined race/ethnicity question going forward. (See https://www.census.gov/newsroom/blogs/random-samplings/2024/04/updates-race-ethnicity-standards.html)

Data Sources:

For 50 States, DC, and Puerto Rico: The American Community Survey, 5-year estimates/Puerto Rico Community Survey, Vintage 2020, accessed through data.census.gov/mdat.

For American Samoa, Guam, the Northern Mariana Islands, or the US Virgin Islands: Decennial Census of Island Areas, 2020. Table DP2. Available through census.data.gov

Appendix D

Survey Instrument

SNAP Language Access Survey

April 24, 2023

Welcome to the SNAP Language Access Survey

- You may complete the survey all at once or save your responses and come back to it later.
- **Please use the SAVE and EXIT button at the bottom of the page when you want to exit your survey and avoid closing out of the browser by clicking the "x" in the top right corner.** Clicking the Save and Exit button will enable you to get right back into the survey – if close out of your browser then you will need to wait 15 minutes to log back in.
- Please use the buttons and links on each page to move through the survey. Using Enter or your browser's Back function may cause errors.
- If you'd like to review the questions before you start the survey, click here for a PDF version of the full survey.
- If you would like to increase the font size of the text, then you can use the zoom function in your browser on your computer.
- If you have trouble accessing the survey, or if you have questions, please contact us at [STUDYADDRESS]@mathematica-mpr.com or [study toll-free telephone number].

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 0584-0681. The time required to complete this information collection is estimated to average 2.50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and

ALL

Overview

Welcome to the SNAP Language Access Survey! This survey is about: (1) the requirements and guidance related to language access, and (2) how SNAP agencies ensure that individuals with limited English proficiency have meaningful access to SNAP. The survey asks about the policies and guidance your agency provides at the State or Territory-level. Although it has some general questions about how language access policies are implemented at the local level, the survey is **not** designed to capture the full depth and breadth of how language access policies are implemented across your State or Territory.

This survey is part of an exploratory study. The Food and Nutrition Service (FNS) is sponsoring the study to better understand how States and Territories have implemented the language access requirements for LEP individuals. Mathematica, an independent research and consulting company, is conducting the study on behalf of the USDA. This survey is not part of any FNS monitoring or auditing activities. The results of the survey will be used for research purposes only. Most of the information collected about each State and Territory in the survey will be publicly reported. The information will not be directly tied to any individual survey respondents, and information about the respondents will not be made public. After data collection is complete, the study team may follow-up with your State if clarification is needed on any answers provided in the survey.

IF HVFIRSTPASSCOMPLETE =1 THEN DO NOT DISPLAY

It will take about two hours to finish this survey. The survey asks for copies of documents about your State or Territory's language access policies and procedures. Hereafter we refer to States or Territories as "States." Gathering the documents will take about 30 minutes and answering the survey questions will take up to two hours. To answer the questions in this survey, it may be useful to have your State's language access plan (if you have one), your States' civil rights procedures, and your State's SNAP training or administrative manual on hand.

Assigning Sections

One or more agency staff can complete the sections of the survey. The sections are:

- SNAP language access policy
- SNAP language access procedures
- Civil rights processes
- SNAP language access training
- SNAP E&T language access procedures
- D-SNAP language access procedures
- SNAP-Ed language access procedures

You may complete the main survey sections yourself or assign other agency staff to complete sections. In the introductory section, you will be able to provide contact information for the person within your agency who is best able to complete each of the other sections. We will send notifications to those people to ask them to complete their assigned sections.

ALL

Personally identifiable information (PII) will not be used to retrieve survey records or data.

For more information

If you have any questions or concerns about the survey, please contact the Mathematica study team at [fill study email address] or the FNS project officer, Eric Williams, at eric.williams@usda.gov.

Thank you in advance for your help in completing this survey.

By proceeding to the next page of the survey, you are acknowledging your understanding of the study and consenting to participate.

SNAP Language Access Survey

Introduction Section

First, please answer some background questions about your SNAP State agency.

NOTE: I1A IS ONLY FOR THE HARD COPY. IF THE RESPONDENT SAYS YES THEN THEY SHOULD GO TO I1b. OTHERWISE THEY SHOULD GO TO I2.

I1a. [PHYSICAL HARD COPY] Is your State SNAP program county-administered?

- ❍ Yes 1
- ❍ No 0

IF COUNTADMIN=1

I1b. [WEB VERSION] Our records indicate that your State is county-administered. Are your policies, procedures, and operations on language access services consistent at the county level across the entire State?

- ❍ Yes 1
- ❍ No 0

ALL

I2. We will be conducting an analysis of the language options offered in State-sponsored SNAP apps. Please list the name of the SNAP app(s) available to SNAP participants.

States may have their own SNAP benefit app that can be downloaded to either an Android or iPhone. These phone apps help participants to manage their SNAP benefits. Typically, these apps allow participants to do things like view their SNAP benefits balance, check spending habits and find stores that accept EBT cards.

ALL

Next, please review the topics covered in each of the SNAP LEP survey sections in the table below and indicate who will respond to each section. You can indicate that you will respond to the questions in the section yourself or designate someone else to respond to these sections.

You may delegate only one person per section.

***Please designate only State-level or Territory-level SNAP staff to complete survey sections*. Please do not designate local office or provider staff; we are seeking a State-level perspective.**

FOR SECTIONS 1 -5: We estimate that this section will take about 20 minutes to complete. A copy of the survey is here for your reference if you would like to see the specific questions being asked - you may need to scroll to the relevant section in the document.

FOR SECTIONS 6-7: We estimate that this section will take about 20 minutes to complete. A copy of the survey is here for your reference if you would like to see the specific questions being asked - you may need to scroll to the relevant section in the document.

Section name	Topics covered	Examples of staff who might be able to respond	I will respond to this section	I will designate someone else to respond to this section
Section 1: SNAP language access policy	• Understanding and implementing Title VI and FNS language access regulations and guidance • How the necessary language services are chosen • Types of language services provided (oral and written) • Process for hiring staff that speak other languages	• SNAP director • SNAP deputy director • SNAP policy staff	1 ❍	2 ❍
Section 2: SNAP language access procedures	• Presence of language access coordinators • Problems and challenges encountered when working with LEP individuals • How the LEP public is notified about language services • Restrictions on the use of family, friends, and children as interpreters; and frequency of use • Evaluation of the qualifications of interpreters, translators, and bilingual staff • Length of time for getting translated documents and interpreters for LEP individuals • Translation procedures	• SNAP director • SNAP deputy director • Language access coordinator • SNAP policy staff	1 ❍	2 ❍

Section name	Topics covered	Examples of staff who might be able to respond	I will respond to this section	I will designate someone else to respond to this section
Section 3: Civil Rights Processes	• Number of civil rights complaints received about language access • Number of findings of noncompliance made in evaluations and reviews • Types of allegations • Process of handling civil rights complaints	• SNAP director • SNAP deputy director • Language access coordinator • SNAP policy staff	1 ❍	2 ❍
Section 4: SNAP language access training	• Training on language access procedures offered to frontline staff • Procedures for informing staff of changes in language access requirements • Training available to bilingual staff and staff who provide interpretation services or translations	• SNAP director • SNAP deputy director • Language access coordinator • SNAP policy staff	1 ❍	2 ❍
Section 5: SNAP E&T language access procedures	• Informing E&T providers of language access requirements • Training for SNAP E&T providers on language access policies, plans, and procedures • Determining languages used for SNAP E&T services • How the LEP public is notified about SNAP E&T language services • English as a Second Language (ESL) class offerings • Exemptions for LEP individuals • Procedures for placing LEP individuals into appropriate component	• SNAP director • SNAP E&T director • SNAP E&T deputy director	1 ❍	2 ❍
Section 6: D-SNAP language access procedures	• Language services provided through D-SNAP • Training for D-SNAP staff on language access policies, plans, and procedures • Determining languages D-SNAP materials and services are provided in • Whether qualified interpreters are available in reserve in the case of a disaster	• SNAP director • D-SNAP director	1 ❍	2 ❍

Section name	Topics covered	Examples of staff who might be able to respond	I will respond to this section	I will designate someone else to respond to this section
Section 7: SNAP-Ed language access procedures	• Informing SNAP-Ed contractors of language access requirements • Training for SNAP-Ed contractors on language access policies, plans, and procedures • Determining languages SNAP-Ed materials and services are provided in • Language access service requirements for SNAP-Ed contractors	• SNAP director • SNAP-Ed director	1 ❍	2 ❍

IF SECTION 1 = 2

SECTION 1: SNAP LANGUAGE ACCESS POLICY

I5. Please provide contact information for the person in your agency who will complete Section 1 on SNAP LEP policy.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 2 = 2

SECTION 2: SNAP LANGUAGE ACCESS PROCEDURES

I6. Please provide contact information for the person in your agency who will complete Section 2 on SNAP language access procedures.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 3 = 2

SECTION 3: CIVIL RIGHTS PROCESSES

I7. Please provide contact information for the person in your agency who will complete Section 3 on Civil Rights Processes.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 4 = 2

SECTION 4: SNAP LANGUAGE ACCESS TRAINING

I8. Please provide contact information for the person in your agency who will complete Section 4 on SNAP LEP training.

First Name: _____

Last Name: _____

Agency: _____

Title: _____

Email address: _____

Telephone number: _____

Additional telephone number: _____

ROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 5 = 2

SECTION 5: SNAP E&T LANGUAGE ACCESS PROCEDURES

I9. Please provide contact information for the person in your agency who will complete Section 5 on SNAP E&T LEP Procedures.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 6 = 2

SECTION 6: D-SNAP LANGUAGE ACCESS PROCEDURES

I10. Please provide contact information for the person in your agency who will complete Section 6 on D-SNAP LEP Procedures.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

IF SECTION 7 = 2

SECTION 7: SNAP-ED LANGUAGE ACCESS PROCEDURES

I11. Please provide contact information for the person in your agency who will complete Section 7 on SNAP-Ed LEP Procedures.

First Name: ☐

Last Name: ☐

Agency: ☐

Title: ☐

Email address: ☐

Telephone number: ☐

Additional telephone number: ☐

PROGRAMMER SOFT CHECK: IF telephone number or email address are missing then add soft check that says: *You did not fill in the email address and/or telephone number. This information will help the study team know who to reach out to about completing this section. Please consider adding this information.*

SNAP Language Access Survey

Section Status Page

The below table shows the person who will complete each section. To reassign a section to a different person, click the link in the Reassign column next to the person's name. The last column shows whether the section has been started, completed, or not started. To access a section that has not been completed, click the link in the Go to Section. If a section has been completed, the answers in that section cannot be changed.

Survey Section	Person who will complete section	Reassign	Go to section	Section status
Section 1: SNAP language access policy	**Programmer: Fill SNAP State administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**
Section 2: SNAP language access procedures	**Programmer: Fill SNAP State administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**
Section 3: Civil rights processes	**Programmer: Fill SNAP administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**

Survey Section	Person who will complete section	Reassign	Go to section	Section status
Section 4: **SNAP language access training**	**Programmer: Fill SNAP administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**
Section 5: **SNAP E&T language access procedures**	**Programmer: Fill SNAP administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**
Section 6: **D-SNAP language access procedures**	**Programmer: Fill SNAP administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**
Section 7: **SNAP-Ed language access procedures**	**Programmer: Fill SNAP administrator name unless section is assigned to another person, then fill with that name.**	**Programmer: Link to make the reassignment.**	**Programmer: Link to the beginning of relevant section.**	**[Not started; Started; Completed]** **Programmer: If not started status as Not started; If partially completed status as Started; If the section is completed and submitted, status as Completed.** **If submitted, the respondent cannot access the section again.**

If you'd like to review the questions in your section before you start, click here for a PDF version of the full survey.

If you have any questions about this survey or would like to complete it over the telephone, please call us at [fill toll-free number].

SECTION 1. SNAP LANGUAGE ACCESS POLICY

The following questions ask about how your SNAP State agency determines the language assistance services it provides, including whether your agency conducts the Federal four-factor analysis of language needs. [IF COUNTADMIN=1: **You should answer all questions about what is generally done in your State.]**

What is the four-factor analysis? The four-factor analysis is a Federal standard used to determine the right language assistance services to ensure LEP individuals have meaningful access to an agency's program and activities. The US Department of Agriculture instructs State agencies to assess the LEP needs of the population they serve and determine the language access services required by balancing four factors (see page 70777, section IV: https://www.federalregister.gov/documents/2014/11/28/2014-27960/guidance-to-federal-financial-assistance-recipients-regarding-the-title-vi-prohibition-against):

1. The number or proportion of LEP individuals eligible to be served or likely to be encountered within the area serviced by the recipient.
2. The frequency with which LEP individuals come in contact with the program or activity.
3. The nature and importance of the program, activity, or service to people's lives.
4. Resources available to your SNAP State agency and the costs of language services.

ALL

A1. Has your SNAP State agency ever conducted the four-factor analysis?

[DEFINITION OF FOUR-FACTOR ANALYSIS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0
- ❍ IF I1b = 0: There is variation in the four-factor analysis being conducted across counties within our State 98

The following questions are about your SNAP State agency's language access plan.

What is a language access plan? Agencies and departmental offices should develop a written language access plan. The plan gives them a framework for their provision of timely and reasonable language assistance and for eliminating or reducing LEP as a barrier to accessing USDA programs and activities. It outlines how they will accomplish these goals.

ALL

A2. Does your SNAP State agency have a language access plan?

[DEFINITION OF LANGUAGE ACCESS PLAN WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0
- ❍ IF I1b = 0: Some counties within our State have a language access plan, but others do not 98

A2 =1

A3. Which of the following elements are included in the language access plan?

[DEFINITION OF LANGUAGE ACCESS PLAN WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

❍ IF I1 = 0: There is variation in the elements included in the language access plan across counties within our State 98

Select one per row

	YES	NO
a. Needs and capacity assessment [*Hover over text: Each agency or Departmental office will have in place mechanisms to assess, on a regular and consistent basis, the LEP status and language assistance needs of current and potential customers and contacts, as well as mechanisms to assess the agency or office's capacity to meet these needs according to the elements of this plan. These mechanisms should employ the four-factor analysis described in the DOJ LEP Guidance Document.*]	1 ❍	0 ❍
b. Interpreter language assistance services [*Hover over text: Arrangements for the provision of oral language assistance, including interpretation assistance by qualified interpreters, in response to the needs of LEP customers, in both face-to face and telephone encounters.*]	1 ❍	0 ❍
c. Written translations [*Hover over text: Each agency or Departmental office will produce vital documents, including website information, in languages other than English where a significant number or percentage of the customers served or eligible to be served has LEP. These written materials may include paper and electronic information such as publications, notices, correspondence, and signs*	1 ❍	0 ❍
d. Policies and procedures related to each of the language access plan elements [*Hover over text: Each agency or Departmental office will have in place specific written policies and procedures related to each of the plan elements and designated staff that will be responsible for implementing activities related to these policies.*]	1 ❍	0 ❍
e. Notification of the availability of free language services [*Hover over text: Each agency or Departmental office will proactively inform LEP customers of the availability of free language assistance services through both oral and written notice, in the primary languages spoken by a significant number of customers and potential customers.]*	1 ❍	0 ❍
f. Staff training *[Hover over text: Each agency or Departmental office will train front-line and managerial staff on the policies and procedures of its language assistance activities.]*	1 ❍	0 ❍
g. Assessing accessibility and quality *[Hover over text: Each agency or Departmental office will institute procedures to assess the accessibility and quality of language assistance services, including translation of vital documents, interpretation, and contractual services for LEP customers. Based on the results of this assessment, the LEP Plan, agency procedures and directives will be revised on an annual basis.]*	1 ❍	0 ❍
h. Other (specify) _____	1 ❍	0 ❍

The following questions are about what your SNAP State agency does in response to:

- ***Title VI of the Civil Rights Act of 1964 (42 USC § 2000d at 7 CFR 15)*** **which prohibits discrimination based on race, color, and national origin in programs and activities receiving Federal financial assistance and USDA implementing regulations at *7 CFR 15.1* *et seq.***
- **SNAP Bilingual Regulations 7 CFR 272.4(b) et seq.,** ***and***
- **USDA Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons With Limited English Proficiency** ***(79 F.R. No. 299, p. 70771-70784, November 28, 2014).***

[DEFINITONS OF UNDERLINED TEXT WILL DISPLAY:

7 CFR part 15: Guidance provided by the U.S. Department of Agriculture for recipients of Federal financial assistance on Title VI as it affects LEP individuals.

SNAP Bilingual Regulations: Based on the estimated total number of low-income households in a project area which speak the same non-English language (a single-language minority), the State agency shall provide bilingual program information and certification materials, and staff or interpreters as needed.]

ALL

A4. Does your SNAP State agency have a Language Access Working Group?

A Language Access Working Group is a group that is responsible for identifying barriers to meaningful language access and developing and implementing strategies and solutions to overcome these barriers.

- ❍ Yes 1
- ❍ No.....0

The following questions ask about your State's specific language access regulations and guidance.

ALL

A5. Does your State have language access regulations or policies that go beyond USDA implementing regulations for Title VI, the SNAP bilingual regulations, and the USDA LEP Guidance?

Going beyond these Federal language access regulations means that your State may have additional or more stringent written regulations or policies than the federal guidance.

[DEFINITION OF TITLE VI, SNAP BILINGUAL REGULATIONS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No.....0

The next series of questions are about how the SNAP State agency sets policies.

ALL

A6. How does your SNAP State agency determine the mix of language services to provide? Language assistance services may include telephone interpreter lines, contracted interpreters, or availability of bilingual staff assistance, etc.?

Select all that apply

- ☐ Reliance on outcome of four-factor analysis....1
- ☐ Guidance from other State agencies 2
- ☐ Guidance from the U.S. Department of Agriculture 3
- ☐ Guidance from other Federal agencies (e.g., Department of Justice) 4
- ☐ State policy....5
- ☐ Other SNAP State agency 6
- ☐ Community feedback 7
- ☐ Other (specify)....99

  [ ]

- ❍ SNAP State agency does not determine the mix of language services to provide 0

ALL

A7. How does your SNAP State agency collect community feedback when updating current language access procedures?

Select all that apply

- ☐ Meet with community leaders 1
- ☐ Meet with community organizations 2
- ☐ Collect feedback (e.g., digital, electronic, letters, phone calls) from the community....3
- ☐ Analyze data collected by community organizations 4
- ☐ Other (specify)....99

  [ ]

- ❍ SNAP State agency does not collect community feedback when updating language access procedures 0

ALL

A8. Which of the following sources of information does your SNAP State agency use to track how often it encounters LEP individuals?

Select all that apply

- ☐ Application data....1
- ☐ Eligibility data....2
- ☐ Case management data....3
- ☐ Customer service survey....4
- ☐ Call center data....5
- ☐ Data from other access points....6
- ☐ Data on applicants requesting language access services....7
- ☐ Other (specify)....99

  [ ]

- ❍ SNAP State agency does not track how often they encounter LEP individuals....0

The next questions ask about the language assistance services that your SNAP State agency offer to ensure meaningful access for applicants and participants with limited English proficiency (hereafter referred to as LEP individuals). LEP individuals do not speak English as their primary language and have a limited ability to read, speak, write, or understand it. We will first ask about your State's oral language services.

PROGRAMMER, INCLUDE THIS HOVER DEFINITON OF "MEANINGFUL ACCESS:" Meaningful access refers to the provision of reasonable language assistance services that enable LEP individuals 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 LEP individual.

ALL

A9. What oral language services does your SNAP State agency offer?

Select all that apply

- ☐ Interpreter service (e.g., telephone, Internet/video, in-person).....1
- ☐ Bilingual speakers on staff [Hover definition of "Bilingual speakers on staff": *Bilingual staff are staff who can converse fluently with individuals needing language assistance in their primary (non-English) language. These staff may or may not have certifications.]* 2
- ☐ Interpreters on staff [*Hover definition of "Interpreters on staff": Interpreters are professionally trained and certified individuals who communicate from one (source language) language to another (target language) orally. Interpreter services could be offered by telephone, internet or video calling, or in-person. Agencies may have interpreters on staff or utilize contracted interpreters.]*.....3
- ☐ Contracted interpreters [*Include hover definition of interpreters*].....4
- ☐ Language bank or dedicated pool of interpreters [*Include hover definition of interpreters*] 5
- ☐ Other (specify) 99
- ❍ IF I1b = 0: There is variation in the oral language services across counties within our State.....98
- ❍ SNAP State agency does not offer any oral language services 0

A9 = 2 OR 3

A10. How does your SNAP State agency determine the languages that bilingual and interpreter staff need to speak in your offices?

Select all that apply

- ☐ By assessing the presence of language groups in the service area using federal data.....1
- ☐ By assessing the presence of language groups in the service area using State and local data.....2
- ☐ By consulting community and/or faith-based organizations that serve and work with LEP communities in the service area 3
- ❍ IF I1b = 0: This activity is delegated to each county and, therefore, there is variation across counties within our State.....98
- ☐ Other method (please describe) 99

ALL

A11. When hiring case workers and other frontline staff how important is it that they speak a language other than English?

- ❍ Not at all important 1
- ❍ Slightly important 2
- ❍ Important 3
- ❍ Fairly important 4
- ❍ Very important 5

The next questions are about translating documents.

ALL

A12. Which of the following vital documents does your SNAP State agency translate?

[Hover-over text for "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]

Select all that apply

- ☐ Consent forms 1
- ☐ Complaint forms 2
- ☐ Notices of rights 3
- ☐ Applications to participate in programs or activities 4
- ☐ SNAP application form 5
- ☐ Notices to households (e.g. notices of rights, notices of denial, loss or decrease in benefits or services) 6
- ☐ Other (specify) 99

  [ ]
- ❍ SNAP State agency does not translate any vital documents 0

A12 = 1,2,3,4,5,6,99

A12a. Why did your SNAP State agency decide to translate the following documents: [FILL ANSWERS FROM A12]?

Select all that apply

- ☐ Members of the public could not access or participate in the program if the document was not translated 1
- ☐ A member of the public could be terminated from this program service if they are unable to complete or understand the document 2
- ☐ A member of the public could suffer significant financial, physical, or other harm if they are unable to understand the document 3

- ☐ The U.S. Department of Agriculture has provided guidance that the documents be translated....4
- ☐ Other SNAP agencies have recommended that the documents are translated 5
- ☐ The community provided feedback that they needed the document translated 6
- ☐ Other (specify)....99

A12 = 1,2,3,4,5,6,99
FILL THE FOLLOWING LANGUAGES IN THE LIST: [CUSTOMIZED LIST] PROGRAMMER: DO NOT ALLOW THE SELECTION OF MORE THAN FIVE LANGUAGES.

A13. What languages do you translate the vital documents into? <u>Not including English or Spanish</u>, please select the top five languages. You may also select less than five languages if applicable to your State.

Select all that apply

- ☐ Chinese 2
- ☐ French 3
- ☐ Tagalog 4
- ☐ Vietnamese 5
- ☐ Korean....6
- ☐ German 7
- ☐ Russian 8
- ☐ Italian....9
- ☐ Other(specify)....99

A12 = 1,2,3,4,5,6,99

A14. How does your State determine into which languages to provide translated vital documents?

[Hover-over text for "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]

Select all that apply

- ☐ By assessing the presence of language groups in the service area using federal data 1
- ☐ By assessing the presence of language groups in the service area using State and local data.....2
- ☐ By consulting community and/or faith-based organizations that serve and work with LEP communities in the service area 3
- ❍ IF I1b = 0: This activity is delegated to each county and, therefore, there is variation across counties within our State.....98
- ☐ Other method (please describe) 99

The next questions ask about other languages services your SNAP State agency offers.

ALL

A15. What other language assistance services does your SNAP State agency offer?

Select all that apply

- ☐ Recorded voice services with English and non-English options (e.g., voicemail, customer service numbers, other telephone services) 1
- ☐ Multilingual online services (e.g., State website, online applications, account management platforms) 2
- ❍ None of the above.....0

IF A15=1OR 2 THEN DISPLAY CORRESPONDING COLUMN IN GRID

FILL THE FOLLOWING LANGUAGES IN THE LIST: [CUSTOMIZED LIST]
FILL SERVICES IN STEM BASED ON ANSWER IN A15

A16. What language options does your SNAP State agency offer for [recorded voice services with English and non-English options, and multilingual online services]?

Not including English or Spanish, please select the top five languages. You may also select less than five languages if applicable.

SELECT ALL THAT APPLY

	Recorded voice services with English and non-English options(e.g., voicemail, customer service numbers, other telephone services)	Multilingual online services (e.g., State website, online applications, account management platforms)
a. Spanish	4 ☐	5 ☐
b. Chinese	4 ☐	5 ☐
c. French	4 ☐	5 ☐
d. Tagalog	4 ☐	5 ☐
e. Vietnamese	4 ☐	5 ☐
f. Korean	4 ☐	5 ☐
g. German	4 ☐	5 ☐
h. Russian	4 ☐	5 ☐
i. Italian	4 ☐	5 ☐
j. Portuguese	4 ☐	5 ☐
k. Other (specify)	4 ☐	5 ☐

PROGRAMMER: Do not allow the selection of more than five languages.

The next set of questions is about your procedures when handling special situations.

ALL

A17. What is your SNAP State agency's policy for frontline staff if they encounter LEP individuals who are only proficient in a language not commonly used in the service area?

Select all that apply

- ☐ Use an interpreter service (e.g., telephone, internet/video, in-person).....1
- ☐ Use the individuals' family members or friends to help provide language services 2
- ☐ Attempt to provide language services in a language other than the primary language of the LEP individual (e.g., try communicating in English or a dialect or language similar to the individual's primary language) 3
- ☐ Use picture aides 4
- ☐ Use of *I Speak* language identification cards or posters.....5
- ☐ Use a tool like Google, Siri, Alexa, etc. to translate.....6
- ☐ Use bilingual staff who speak these languages.....7
- ☐ Other (specify) 99

  [ ]
- ❍ SNAP State agency does not have a policy for this situation 0

ALL

A18. Which of the following services does your SNAP State agency provide for languages that are mostly spoken and not written? For example, some dialects of Chinese or some Native American languages.

Select all that apply

- ☐ Use an interpreter service (e.g., telephone, Internet/video, in-person) 1
- ☐ Use bilingual staff who speak these languages.....2
- ☐ Contract interpreters who speak these languages 3
- ☐ Use these individuals' family members or friends as interpreters 4
- ☐ Other (specify) 99

  [ ]
- ❍ SNAP State agency does not provide any services listed above 0

ALL

A19. How does your SNAP State agency provide language services in unexpected situations?

An example of an unexpected situation would be a benefit issuance system outage, running out of translated materials, encountering a LEP individual speaking a less common language for which you do not have materials or services, or having a LEP individual who frontline staff cannot communicate with visit the office without an appointment.

Select all that apply

- ☐ Use an interpreter service (e.g., telephone, Internet/video, in-person) 1
- ☐ Use the individuals' family members or friends to help provide language services 2
- ☐ Identify the language service that is needed and reschedule with individual when service is available 3
- ☐ Attempt to provide language services in a language other than the language of the LEP individual (e.g., try communicating in English or a dialect or language similar to the individual's primary language) 4
- ☐ Use picture aides 5
- ☐ Use of *I Speak* language identification cards or posters.....6
- ☐ Use a tool like Google, Siri, Alexa, etc. to translate.....7
- ☐ Use bilingual staff who speak these languages.....8
- ☐ Other (specify).....99

  [ ]

- ❍ SNAP State agency does not provide language services in unexpected situations 0

ALL

A20. Does your SNAP State agency use multiple translations for languages that have regional variation for example, Puerto Rican Spanish and Mexican Spanish?

- ❍ Yes 1
- ❍ No.....0
- ❍ IF I1b = 0: This activity is delegated to each county and, therefore, there is variation across counties within our State.....98

ALL

A21. Does your SNAP State agency share language assistance resources with SNAP agencies in other States or other agencies within your State?

Select all that apply

- ☐ Yes, we share resources with SNAP agencies in other States 1
- ☐ Yes, we share resources with other agencies within the State 2
- ❍ No 0

The next set of questions is on whether your SNAP State agency has the information and resources needed to implement language access regulations and guidance.

ALL

A22. What additional information about Title VI and the Federal language access regulations and guidance could FNS provide to be helpful to your SNAP State agency?

[DEFINITION OF TITLE VI WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM. THE DEFINTION IS: *Title VI of the Civil Rights Act of 1964 (42 USC § 2000d at 7 CFR 15)* which prohibits discrimination based on race, color, and national origin in programs and activities receiving Federal financial assistance and USDA implementing regulations at *7 CFR 15.1 et seq.]*

Select all that apply

- ☐ Tools for implementing Title VI and Federal regulations and guidance.....1
- ☐ Examples of best practices in how other SNAP agencies implement Title VI and Federal regulations and guidance (this may include examples of documents, tools, training, etc.) 2
- ☐ Information on how to implement Title VI and Federal regulations and guidance for SNAP E&T, SNAP-Ed, and D-SNAP 3
- ☐ More detailed guidance on implementing Title VI and Federal regulations.....4
- ☐ Other (specify) 99

  [ ]

- ❍ No other information about Title VI and Federal language access regulations and guidance is needed .....0 +

ALL

A23. How much do you agree or disagree with the following statement? My SNAP State agency has the resources to implement language access plans, policies, and procedures to meet Federal regulations and guidance.

Select one only

- ❍ Strongly agree.....1
- ❍ Agree.....2
- ❍ Disagree.....3
- ❍ Strongly disagree 4

ALL

A24. How much do you agree or disagree with the following statement? My SNAP State agency has the resources to implement language access plans, policies, and procedures to meet State regulations and guidance.

Select one only

- ❍ Strongly agree 1
- ❍ Agree 2
- ❍ Disagree 3
- ❍ Strongly disagree 4

ALL

A25. How much do you agree or disagree with the following statement? My State's SNAP State agency provides the same level of language assistance services to LEP individuals regardless of whether they live in rural or urban areas.

Select one only

- ❍ Strongly agree 1
- ❍ Agree 2
- ❍ Disagree 3
- ❍ Strongly disagree 4

ALL

A26. What additional resources do your SNAP State agency need to ensure LEP individuals have meaningful access to SNAP?

[DEFINITION OF MEANINGFUL ACCESS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Increased funding 1
- ☐ More staffing 2
- ☐ Translated materials 3
- ☐ Support for agency staff training 4
- ☐ External resources (e.g., community partners with language access services) 5
- ☐ Translator and interpreter services (e.g., telephone, Internet/video, in-person) 6
- ☐ Support for oversight and quality assurance 7
- ❍ No additional resources needed 0
- ☐ Other (specify) 99

ALL

A27. Does your SNAP State agency regularly communicate with FNS about language access requirements?

- ❍ Yes 1
- ❍ No 0

ALL

A28. How much do you agree or disagree with the following statement? My SNAP State agency receives enough technical assistance from FNS about language access requirements.

Technical assistance is the process of providing focused support to an organization with a need or problem.

Select one only

- ❍ Strongly agree 1
- ❍ Agree 2
- ❍ Disagree 3
- ❍ Strongly disagree 4

ALL

A29. How much do you agree or disagree with the following statement? My SNAP State agency receives enough communications from FNS on language access requirements.

Select one only

- ❍ Strongly agree 1
- ❍ Agree 2
- ❍ Disagree 3
- ❍ Strongly disagree 4

ALL

A30. Does your SNAP State agency share language assistance resources, language access plans, or other guidance with other SNAP agencies?

- ❍ Yes 1
- ❍ No 0

ALL

A31. To what extent do the SNAP State agency staff understand Title VI and the Federal language access regulations and guidance?

[DEFINITION OF TITLE VI WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ Not at all 1
- ❍ A little 2
- ❍ Somewhat 3
- ❍ A great deal 4

A2 =1

A32. Would you share your most recent language access plan with us?

[DEFINITION OF LANGUAGE ACCESS PLAN WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ It is available publicly on our website 1
- ☐ It is not on our website, but I can send it via email 2
- ☐ It is not on our website, but I can upload it to a secure site 3
- ❍ No, I cannot share the language access plan 4
- ❍ Don't know ..... d

A32=1

A33. Would you please share the URL(s) where we can find the language access plan?

(STRING 1000)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

A34. Do you have State guidance or policy documents related to language access that you could share with us?

Select all that apply

- ☐ These documents are available publicly on our website 1
- ☐ These documents are not on our website, but I can send them via email.....2
- ☐ These documents are not on our website, but I can upload them to a secure site.....3
- ❍ No, I cannot share the State guidance or policy documents 4
- ❍ No, we do not have any State guidance or policy documents.....5
- ❍ Don't know .....d

A34=1

A35. Would you please share the URL(s) where we can find the State guidance or policy documents related to language access?

(STRING 1000)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

A_END. Thank you for completing this section. If you have more information you would like to share about SNAP language access policy in your State or Territory, please share it below.

(STRING 1000)

SECTION 2: SNAP LANGUAGE ACCESS PROCEDURES

The next questions are about how your SNAP State agency implements policies and procedures that comply with Title VI and Federal regulations and guidance that deal with language access for persons with LEP. [IF COUNTADMIN=1: You should answer all questions about what is generally done in your State.]

ALL

B1. Does your SNAP State agency have a designated language access coordinator?

[*HOVER OVER TEXT: The language access coordinator's job is to coordinate and monitor the implementation of the State agency's language access plan, policies, and procedures.]*

- ❍ Yes 1
- ❍ No.....0

IF B1 = 1

B2. Is the language access coordinator responsible for developing a language access plan?

[DEFINITION OF LANGUAGE ACCESS PLAN WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No.....0

ALL

B3. When working with <u>sub-recipients</u> does your SNAP State agency incorporate any of the following requirements in your contract or other similar types of agreements, such as an memorandum of understanding (MOU), to ensure that you can meet the federal language access requirements?

[DEFINITION OF LANGUAGE ACCESS PLAN WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[Hover-over text: Sub-recipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Select all that apply

- ☐ Having a language access plan 1
- ☐ Appointing a language access coordinator 2
- ☐ Some other requirement 99

  [ ]
- ❍ IF I1b = 0: Working with sub-recipients is delegated to each county and, therefore, there is variation across counties within our State 98
- ❍ Not applicable – we do not work with subrecipients 97
- ❍ No, we do not put any language access requirements in sub-recipient contracts 0

ALL

B4. How do <u>staff</u> in your State conduct outreach to the LEP communities about SNAP services?

Select all that apply

- ☐ Posting signs in intake areas and other entry points 1
- ☐ Distributing outreach documents about SNAP services 2
- ☐ Working with community-based organizations and other stakeholders to inform LEP individuals of SNAP services 3
- ☐ Using a telephone voice mail menu 4
- ☐ Including notices in local newspapers in languages other than English 5
- ☐ Providing notices on non-English–language radio and television stations about the available SNAP services and how to get them 6
- ☐ Delivering presentations and/or notices to organizations in the community (e.g., schools, religious institutions, senior centers, community centers) organizations 7
- ☐ Other (specify) 99

  [ ]
- ❍ Staff do not conduct outreach to the LEP communities about SNAP services 0

ALL

B5. How do frontline staff in your State inform LEP communities about the language assistance services (e.g., interpreters or translated materials) that are provided at no cost to individuals?

Frontline staff are staff who 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.

Select all that apply

- ☐ Posting signs in intake areas and other entry points 1
- ☐ Stating in outreach documents that language access services are available from the agency 2
- ☐ Working with community-based organizations and other stakeholders to inform LEP individuals of the language access services 3
- ☐ Using a telephone voice mail menu 4
- ☐ Including notices in local newspapers in languages other than English 5
- ☐ Providing notices on non-English–language radio and television stations about the available language assistance services and how to get them 6
- ☐ Delivering presentations and/or notices to organizations in the community (e.g., schools, religious institutions, senior centers, community centers) 7
- ☐ Other (specify) 99

  [ ]

- ❍ Frontline staff do not inform LEP communities about the language assistance services that are provided at no cost 0

ALL

B6. How does your State determine whether frontline staff are providing the appropriate language assistance services to LEP applicants and participants?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Evaluations conducted by leaders of frontline staff 1
- ☐ Conducts quality assurance of records kept by frontline staff 2
- ☐ Feedback from LEP applicants/participants 3
- ☐ Frontline staff self-evaluations 4
- ☐ Frontline staff peer evaluations 5
- ❍ Other (specify) 99

  [ ]

- ❍ The State has not determined if frontline staff are providing the appropriate language assistance services 0

ALL

B7. How are <u>frontline staff</u> notified of an existing customer's needs for written and/or verbal language assistance services?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Provided to the frontline staff via email or telephone.....1
- ☐ Recorded in the eligibility and/or case management system(s) 2
- ☐ Other (specify).....99

  [ ]
- ❍ Frontline staff are not notified 0

ALL

B8. Does your SNAP State agency have a written procedure for how <u>frontline staff</u> determine whether an applicant or participant requires language assistance?

[DEFINITION OF FRONTLINE STAFF WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ Yes, the SNAP State agency provides a written procedure to frontline staff.....1
- ❍ No, the SNAP State agency does not provide written procedures to frontline staff.....2
- ❍ IF I1b = 0: There is variation in these written procedures across counties within our State 98

ALL

B9. Does your SNAP State agency have a written procedure for how <u>frontline staff</u> are to <u>document</u> the language assistance services provided to applicants and participants who require language assistance?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No.....0

ALL

B9a. How does your SNAP State agency <u>record</u> the primary language spoken and/or the language assistance provided at the point of contact with LEP individuals?

Select all that apply

- ☐ This information is recorded in the eligibility and/or case management system in a standardized data field (such as a drop-down menu to select primary language spoken) 1
- ☐ This information is recorded in the eligibility and/or case management system in an open notes field 2
- ☐ This information is shared via email or phone…… 3
- ☐ Other (specify) 99

  [ ]

- ❍ There is no standardized method to record language service needs 0

ALL

B10. Does your SNAP State agency formally track requests <u>for translated materials</u> in languages they do not routinely encounter?

By "formally track" we are referring to a system or database that your State may have to document these requests.

- ❍ Yes 1
- ❍ No 0

B10=1

B10a. How often does your SNAP State agency respond to requests for translated materials in languages you do not serve on a regular basis? Your best estimate is fine.

Select one only

- ❍ At least once every week 1
- ❍ At least once every month (but less than every week) 2
- ❍ At least once every quarter (but less than every month) 3
- ❍ At least once every year (but less than every quarter) 4
- ❍ Never 0

ALL

B11. Does your SNAP State agency formally track requests <u>for oral interpreter services</u> in languages they do not routinely encounter?

By "formally track" we are referring to a system or database that your State may have to document these requests.

- ❍ Yes 1
- ❍ No 0

B11=1

B11a. How often does your SNAP State agency respond to requests for oral interpreter services in languages you do not serve on a regular basis? Your best estimate is fine.

Select one only

- ❍ At least once every week 1
- ❍ At least once every month (but less than every week) 2
- ❍ At least once every quarter (but less than every month) 3
- ❍ At least once every year (but less than every quarter) 4
- ❍ Never 0

ALL

B12. What challenges does your SNAP State agency have when working with LEP individuals?

Select all that apply

- ☐ Lack of funding 1
- ☐ Not enough bilingual staff 2
- ☐ Not have enough translated materials 3
- ☐ There is not enough support for training 4
- ☐ Not enough interpreters onsite to provide services 5
- ☐ Not enough bilingual/multilingual staff onsite to provide services 6
- ☐ Do not have access to interpreter services (e.g., telephone, Internet/video, in-person) 7
- ☐ Not enough support for oversight and quality assurance 8
- ☐ Other (specify) 99

  [ ]

- ❍ SNAP State agency has not experienced any challenges working with LEP individuals 0

ALL

B13. What do <u>frontline staff</u> do when they are unable to communicate with an LEP individual?

[DEFINITION OF FRONTLINE STAFF WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Use an interpreter service (e.g., telephone, Internet/video, in person).....1
- ☐ Use the individuals' family members or friends to help provide language services 2
- ☐ Identify the language service that is needed and reschedule with individual when service is available 3
- ☐ Attempt to provide language services in a language other than the primary language of the LEP individual (e.g., try communicating in English or a dialect or language similar to the individual's primary language) 4
- ☐ Use picture aides 5
- ☐ Use a tool like Google, Siri, Alexa, etc. to translate.....6
- ☐ Use bilingual staff who speak these languages.....7
- ☐ Other (specify).....99

  [ ]

- ❍ There is no policy for what frontline staff should do if they are unable to communicate with an LEP individual 0

ALL

B14. Does your SNAP State agency allow exemptions to LEP individuals (e.g., from work requirements) if there are no frontline staff who are proficient in their primary language?

- ❍ Yes 1
- ❍ No.....0

ALL

B15. How can LEP participants share their feedback or concerns about the agency's language assistance services or lack thereof with SNAP State agencies?

Select all that apply

- ☐ Feedback section on website.....1
- ☐ Feedback form, available at local SNAP offices.....2
- ☐ Frontline staff submit feedback they receive from individuals.....3
- ☐ Feedback section at the end of the application.....4
- ☐ Through surveys.....5
- ☐ Call the toll-free number or email.....6
- ☐ Other (specify).....99

  [ ]

- ❍ SNAP State agency does not collect feedback.....0

The next series of questions focus on the translation, interpretation, and bilingual services in your State.

[DEFINITONS OF UNDERLINED TEXT WILL DISPLAY:

Translation: The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

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.*

Bilingual services: *Bilingual services involve providing staff who can converse fluently with LEP individuals in their primary language.]*

ALL

B16. In general, how does your SNAP State agency translate content, materials, or services that are provided online (e.g. websites, online automated applications, EBT platforms etc.)?

Select all that apply

- ☐ Automated translation software.....1
- ☐ FNS-provided translations of essential documents.....2
- ☐ Qualified human translators.....3
- ☐ Other (specify).....99

  [ ]

- ❍ SNAP State agency does not translate content, materials, or services that are provided online.....0

ALL
DISPLAY OPTIONS 1 AND 2 IF B16=1

B17. What language assistance resources are available to help LEP individuals access SNAP websites, web portals, or online applications?

Select all that apply

- ☐ [Automated translation software is used for all online services .....1]
- ☐ [Automated translation software is used for some online services .....2]
- ☐ Written translations of vital documents *[Hover over definition: 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.]* 3
- ☐ Multilingual written translated notices of the right to receive competent oral interpretation, free of cost 4
- ☐ Other (specify) 99

  [ ]
- ❍ SNAP State agency does not offer language assistance resources to help LEP individuals access SNAP websites, web portals, or online applications 0

ALL

B18. How does the SNAP State agency evaluate the qualifications of interpreters and translators during the hiring or contracting process?

[Hover-over text: Interpreters are staff who translate from one language to another orally. Interpreter services could be offered by telephone, internet or video calling, or in-person.

Translators are staff who translate written material from English to another language and vice versa.]

Select all that apply

- ☐ Academic degree 1
- ☐ Certification 2
- ☐ Work experience 3
- ☐ Interview 4
- ☐ Language test or assessment 5
- ☐ Training attendance records 6
- ☐ Other (specify) 99

  [ ]
- ❍ SNAP State agency does not evaluate the qualifications of interpreters and translators 0

ALL

B19. How does the SNAP State agency evaluate the qualifications of <u>bilingual staff</u> during the hiring process?

[Hover-over text: Bilingual staff are staff who can converse fluently with LEP persons in their primary (non-English) language.]

Select all that apply

- ☐ Academic degree 1
- ☐ Certification 2
- ☐ Work experience 3
- ☐ Interview 4
- ☐ Language test or assessment 5
- ☐ Training attendance records 6
- ☐ Other (specify) 99

- ❍ SNAP State agency does not evaluate the qualifications of bilingual staff during the hiring process 0
- ❍ IF I1b = 1: There is variation in how the qualifications of bilingual staff are evaluated during the hiring process across counties within our State 98

ALL

B20. How does the SNAP State agency evaluate the qualifications of an advocacy organization's translators and interpreters?

[DEFINITION OF INTERPRETER AND TRANSLATOR WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Academic degree(s) of organization's staff 1
- ☐ Certification(s) of organization's staff 2
- ☐ Work experience(s) of organization's staff 3
- ☐ Interview(s) with organization's staff 4
- ☐ Language test(s) or assessment(s) of organization's staff 5
- ☐ Recommendation from organization leadership 6
- ☐ Training attendance records 7
- ☐ Other (specify) 99

- ❍ SNAP State agency does not evaluate the qualifications of an advocacy organization's translators and interpreters 0

ALL

B21. How do frontline staff in your State communicate verbally with LEP individuals?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ State always has bilingual staff available in person and by telephone 1
- ☐ State uses on-staff interpreters 2
- ☐ State uses contracted interpreters 3
- ☐ State uses interpreters from advocacy organizations 4
- ☐ Staff use a telephonic interpreter service 5
- ☐ Family members or friends 6
- ☐ Other (specify) 99

- ❍ There are no services that frontline staff offer to verbally communicate with LEP individuals 0

ALL

B22. How long does it take to get translated documents to LEP individuals if their language is commonly spoken in the State or locality?

Select one only

- ❍ 1 day or less 1
- ❍ 2 to 3 days 2
- ❍ 4 to 6 days 3
- ❍ 1 to 2 weeks 4
- ❍ 3 to 4 weeks 5
- ❍ 5 weeks or more 6
- ❍ Our State does not offer translated documents to LEP individuals 0

ALL

B23. How long does it take to get <u>interpreters</u> for LEP individuals if their language is commonly spoken in the State or locality?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ 1 day or less 1
- ❍ 2 to 3 days 2
- ❍ 4 to 6 days 3
- ❍ 1 to 2 weeks 4
- ❍ 3 to 4 weeks 5
- ❍ 5 weeks or more 6
- ❍ Our State does not offer interpreters for LEP individuals 0

ALL

B24. How long does it take to get translated documents to LEP individuals if their language is rarely encountered in the State or locality?

Select one only

- ❍ 1 day or less 1
- ❍ 2 to 3 days 2
- ❍ 4 to 6 days 3
- ❍ 1 to 2 weeks 4
- ❍ 3 to 4 weeks 5
- ❍ 5 weeks or more 6
- ❍ Our State does not offer translated documents to LEP individuals 0

ALL

B25. How long does it take to get interpreters for LEP individuals if their language is rarely encountered in the State or locality?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ 1 day or less 1
- ❍ 2 to 3 days 2
- ❍ 4 to 6 days 3
- ❍ 1 to 2 weeks 4
- ❍ 3 to 4 weeks 5
- ❍ 5 weeks or more 6
- ❍ Our State does not offer interpreters for LEP individuals 0

ALL

B26. If an individual with limited English proficiency chooses to use their family or friend as an interpreter, does the SNAP State agency require the individual to sign a waiver of their right to free interpreter services (e.g., telephone, Internet/video, in-person)?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0

ALL

B27. When does the SNAP State agency permit the use of family and friends as interpreters?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ For routine matters (such as the location of an office or hours of an agency) 1
- ☐ During an emergency when no other interpretation is available 2
- ☐ After an LEP individual has filled out a wavier to use an interpreter of their choosing 3
- ☐ When filling out an application 4
- ☐ During an interview 5
- ☐ During all interactions with the LEP individual 6
- ❍ Never 0

ALL

B28. When does the SNAP State agency permit the use of children as interpreters?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ For routine matters (such as the location of an office or hours of an agency) 1
- ☐ During an emergency when no other interpretation is available 2
- ☐ After an LEP individual has filled out a wavier to use an interpreter of their choosing 3
- ☐ When filling out an application 4
- ☐ During an interview 5
- ☐ During all interactions with the LEP individual 6
- ❍ Never 0

ALL

B29. How often do frontline staff use family and friends of LEP individuals as interpreters?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF FRONTLINE STAFF WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ Never 1
- ❍ Rarely 2
- ❍ Sometimes 3
- ❍ Usually 4
- ❍ Always 5

ALL

B30. How often do frontline staff use children of LEP individuals as interpreters?

[DEFINITION OF INTERPRETER WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF FRONTLINE STAFF WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one only

- ❍ Never 1
- ❍ Rarely 2
- ❍ Sometimes 3
- ❍ Usually 4
- ❍ Always 5

ALL

B31. The next questions are about translation procedures. When does the SNAP State agency ensure that changes made to English documents are translated into the languages commonly used by applicants?

[DEFINITION OF TRANSLATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ SNAP State agency updates translations when English vital documents are updated *[Hover over definition: 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]* 1
- ☐ Based on a systematic reoccurring evaluation process [Hover over definition: *A systematic reoccurring evaluation process refers to a process the State may have for reviewing translated documents or materials on a regular basis.*] 2
- ☐ When there are changes in the population of LEP individuals served 3
- ☐ Other (specify) 99

  [ ]

- ❍ Our State does not offer translated documents to LEP individuals 0

ALL

B32. How does the SNAP State agency ensure translation accuracy and cultural competency?

[DEFINITION OF TRANSLATION WILL APPEAR WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ We check on the U.S. Department of Agriculture, FNS website for existing translated terminology 1
- ☐ One staff person translates the document and another staff person reviews 2
- ☐ Documents are reviewed to ensure that the language level is consistent in documents 3
- ☐ Documents are reviewed by a translator or staff person who is fluent in the language to ensure they use culturally sensitive terminology [*Hover definition of "culturally sensitive terminology": Each society is different and has different norms; so the translations should reflect these norms to appeal to the specific group.*]
- ☐ Other (specify).....99

  [ ]
- ❍ Our State does not offer translated documents to LEP individuals 0

ALL

B33. Do you have informational materials on how the SNAP State agency implements language access policies and procedures (e.g. training manuals or policy memos) you could share with us?

Select all that apply

- ☐ These materials are available publicly on our website 1
- ☐ These materials are not on our website, but I can send them via email.....2
- ☐ These materials are not on our website, but I can upload them to a secure site.....3
- ❍ No, I cannot share the informational materials on how the SNAP State agency operates language access policies and procedures 4
- ❍ No, we do not have any informational materials on how the SNAP State agency operates language access policies and procedures.....5
- ❍ Don't know .....d

B33 = 1

B34. Would you please share the URL(s) where we can find the informational materials on how the SNAP State agency operates language access policies and procedures?

(STRING 1000)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

B_END. Thank you for completing this section. If you have more information you would like to share about SNAP language access procedures in your State or Territory, please share it below.

SECTION 3: CIVIL RIGHTS PROCESSES

The next series of questions asks about your State's civil rights processes. [IF COUNTADMIN=1: You should answer all questions about what is generally done in your State.]

ALL

C1. Does your SNAP State agency offer any types of language access services as a result of a past relevant court decision, civil rights complaint investigation, or compliance review?

- ❍ Yes 1
- ❍ No 0

ALL

C2. How does your SNAP State agency inform people they can file complaints about language access services directly with the U.S. Department of Agriculture (USDA)?

Select all that apply

- ☐ Application forms include FNS-approved nondiscrimination statement 1
- ☐ Complaint forms (paper/online) include FNS-approved nondiscrimination statement 2
- ☐ Staff share this information verbally with individuals 3
- ☐ Notices or signs are posted in the office 4
- ☐ USDA And Justice for All, or an FNS-approved substitute, is in the office 5
- ☐ SNAP State websites show this information 6
- ☐ This information is included in a telephone voice mail menu 7
- ☐ Other (specify) 99

- ❍ The SNAP State agency does not do this 0

ALL

C3. Does your SNAP State agency have a process for handling civil rights complaints related to language access and national origin discrimination that is approved by the FNS Civil Rights Division?

- ❍ Yes 1
- ❍ No 0

ALL

C4. In the past 5 years, has your SNAP State agency had any findings of noncompliance for Civil Rights language access requirements? These can be a result of a FNS Management Evaluation or a FNS Civil Rights Compliance Review.

- ❍ Yes 1
- ❍ No 0

C4=1

C5. How many findings of noncompliance for Civil Rights language access requirements were found because of a FNS Management Evaluation or a FNS Civil Rights Compliance Review?

Select one only

- ❍ 1-2 1
- ❍ 3-5 2
- ❍ 5-10 3
- ❍ More than 10 4

C4=1

C6. Did your SNAP State agency take the necessary corrective actions to resolve findings of noncompliance?

- ❍ Yes 1
- ❍ No 0

ALL

C7. Did your State agency receive any civil rights complaints in the past 12 months that were specifically about language access?

- ❍ Yes 1
- ❍ No 0

C7 = 1

C8. In the past 12 months, how many civil rights complaints did your SNAP State agency receive because it did not provide language access services?

[ ] NUMBER

❍ Don't know .....d

C7=1

C9. What types of allegations were raised in the civil rights complaints received over the past 12 months?

Please only include information on complaints specific to language access services.

Select all that apply

☐ Failed to provide a qualified interpreter or translated materials *[Hover over definition: A qualified interpreter is a highly trained individual who mediates spoken communication between people speaking different languages without adding, omitting, or distorting meaning or editorializing. A qualified interpreter is competent to provide interpreter services at a level of fluency, comprehension, impartiality, and confidentiality appropriate to the specific nature, type, and purpose of the information being interpreted.]* 1

☐ Online application system was not available in the most commonly used languages besides English 2

☐ Recipient was not notified of rights 3

☐ Discrimination against a member of a State-specific protected class 4

☐ Reasonable steps not being taken to provide meaningful access to SNAP 5

☐ Incident with staff member(s).....6

☐ Denial of needed benefits and services.....7

☐ Delay in service delivery 8

☐ Wrong services were provided.....9

☐ Ineffective services were provided.....10

☐ Voicemail menus on customer service lines are not accessible to persons with LEP 1

☐ Other (specify).....99

[ ]

C7=1

C10. Did your SNAP State agency inform the FNS Civil Rights Division about all these civil rights complaints on language access before it initiated an investigation of the allegations?

Please only include information on complaints specific to language access services

Select one only

- ❍ Yes, we notified the FNS Civil Rights Division of all complaints.....1
- ❍ We notified the FNS Civil Rights Divisions of some complaints 2
- ❍ No, we did not notify the FNS Civil Rights Division about any of the complaints 0

C8 > 0, DOES NOT EQUAL DK

PREFILL NUMBER FROM C8

C11. How many of the [NUMBER FROM C8] civil rights complaints about language access services in the last 12 months resulted in a determination of noncompliance or unlawful discrimination?

[ ] NUMBER

- ❍ Don't know .....d

C11 > 0, DOES NOT EQUAL DK

PREFILL NUMBER FROM C11

C12. What corrective actions has your SNAP State agency taken in response to the [NUMBER FROM C11] complaints related to language access services that were determined noncompliant?

Select all that apply

- ☐ Provided written notice to local agencies or sub-recipients of areas of noncompliance and required actions to correct the situation 1
- ☐ Negotiated with local agencies or sub-recipients to achieve compliance.....2
- ☐ Submitted a Report of Findings of Noncompliance to the FNS Regional Civil Rights Officer if corrective action has not been taken within 60 days of finding 3
- ☐ Other (specify).....99

  [ ]

- ❍ No corrective actions have been taken.....0

ALL

C13. Do you have State guidance or policy documents related to submitting and/or addressing civil rights complaints that you could share with us?

Select all that apply

- ☐ These documents are available publicly on our website 1
- ☐ These documents are not on our website, but I can send them via email.....2
- ☐ These documents are not on our website, but I can upload them to a secure site.....3
- ❍ No, I cannot share them.....4
- ❍ No, we do not have any 5
- ❍ Don't know .....d

C13 = 1

C14. Would you please share the URL(s) where we can find the State guidance or policy documents related to submitting and/or addressing civil rights complaints?

(STRING 100)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

C15. Do you have any informational materials you provide to SNAP participants on submitting civil rights complaints that you could share with us?

Select all that apply

- ☐ These materials are available publicly on our website 1
- ☐ These materials are not on our website, but I can send them via email.....2
- ☐ These materials are not on our website, but I can upload them to a secure site.....3
- ❍ No, I cannot share any informational materials we provide to SNAP participants on submitting civil rights complaints 4
- ❍ No, we do not have any informational materials we provide to SNAP participants on submitting civil rights complaints 5
- ❍ Don't know .....d

C15 = 1

C16. Would you please share the URL(s) where we can find informational materials you provide to SNAP participants on submitting civil rights complaints?

(STRING 1000)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

C_END. Thank you for completing this section. If you have more information you would like to share about civil rights processes in your State or Territory, please share it in the box below.

(STRING 1000)

SECTION 4: SNAP LANGUAGE ACCESS TRAINING

This next series of questions reviews the training on language access services provided to staff. [IF COUNTADMIN=1: You should answer all questions about what is generally done in your State.]

ALL

D1. Do <u>frontline staff</u> receive an annual training on civil rights?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0

ALL

FILL TEXT "THAT GOES BEYOND THE TRAINING RECEIVED IN THE ANNUAL CIVIL RIGHTS TRAINING" IF D1 = 1

D2. Do <u>frontline staff</u> receive other types of training on language access procedures [that goes beyond the training received in the annual civil rights training]?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0

ALL

D3. How would your SNAP State agency inform <u>frontline staff</u> of these changes in language access policies, plans, and procedures?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Virtual meetings 1
- ☐ In-person meetings 2
- ☐ Program office or department's intranet site 3
- ☐ SNAP external website 4
- ☐ Email updates 5
- ☐ Operational memos 6
- ☐ Phone calls 7
- ☐ Other (specify) 99

ALL

D4. How does your SNAP State agency receive feedback from frontline staff about challenges implementing language access policies, plans and procedures?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Frontline staff complete surveys about their experience 1
- ☐ Supervisors observe frontline staff interactions with LEP individuals.....2
- ☐ Through group discussions or meetings with frontline staff.....3
- ☐ Frontline staff have one-on-one conversations with supervisors.....4
- ☐ Frontline staff provide ad hoc feedback.....5
- ☐ Other (specify).....99

  [ ]

- ❍ No feedback is collected from frontline staff 0

IF D4 DOES NOT EQUAL 0

D5. How does the SNAP State agency train frontline staff on its language access policies, plans and procedures?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Online trainings 1
- ☐ Conferences.....2
- ☐ Group in-person trainings 3
- ☐ Group virtual trainings.....4
- ☐ One-on-one virtual trainings.....5
- ☐ On-the-job training *[Hover over text: On-the-job training typically involves a combination of observing others and hands-on experience under the supervision of a training manager, co-worker, or outsourced professional trainer*].....6
- ☐ Other (specify).....99

  [ ]

ALL

D6. What kinds of training does your SNAP State agency provide for bilingual staff or staff who provide interpretation services or translations?

[DEFINITION OF BILINGUAL STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Professional training courses for bilinguals, interpreters, and translators 1
- ☐ Training on language access policy and procedure 2
- ☐ Having a third-party evaluator test the staff's language skills.....3
- ☐ Other (specify).....99

ALL

D7. Are frontline staff trained on how to use or arrange for the following types of interpreter services?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one per row

	YES	NO	Not Applicable, my State does not have this service
a. Telephone interpreters	1 ❍	0 ❍	❍
b. Web-based or video interpreters	1 ❍	0 ❍	❍
c. In-person interpreters	1 ❍	0 ❍	❍

ALL

D8. Do you have training materials for frontline staff on language access procedures that you could share with us (this may include training manuals, power point slides, memos etc.)?

[DEFINITION OF FRONTLINE STAFF WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ These materials are available publicly on our website 1
- ☐ These materials are not on our website, but I can send them via email.....2
- ☐ These materials are not on our website, but I can upload them to a secure site.....3
- ❍ No, I cannot share any training materials for frontline staff on language access obligations.....4
- ❍ No, we do not have any training materials for frontline staff on language access obligations.....5
- ❍ Don't know .....d

D8 = 1

D9. Would you please share the URL(s) where we can find the training materials for frontline staff on language access obligations?

(STRING 1000)

PROGRAMMER: IF NO URL ADDED THEN SAY: **Please remember to add in the URL so that the study team can find the documentation.**

ALL

D_END. Thank you for completing this section. If you have more information you would like to share about SNAP language access training in your State or Territory, please share it in the box below.

(STRING 1000)

SECTION 5. SNAP E&T LANGUAGE ACCESS PROCEDURES

The next set of questions are about language services provided in SNAP E&T programs. You should answer all questions about what is generally done in your State.

ALL

E1. How does your SNAP State agency inform SNAP E&T providers of Title VI and their language access requirements?

SNAP E&T providers are organizations or agencies who provide SNAP E&T services and components to eligible SNAP participants. SNAP E&T providers could be SNAP State agency staff or subrecipient organization or agency staff (such as a Department of Labor or Community College).

Select all that apply

- ☐ Virtual meetings 1
- ☐ In-person meetings 2
- ☐ SNAP *internal* website 3
- ☐ SNAP *external* website 4
- ☐ Email updates 5
- ☐ Updates sent by mail (e.g., brochures and memos) 6
- ☐ Phone calls 7
- ☐ Other (specify) 99

  [ ]

- ❍ SNAP State agency does not have a way to inform SNAP E&T providers of Title VI and language access requirements 0

ALL

E2. Does the SNAP State agency provide training to SNAP E&T providers about Title VI and their language access requirements?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes, the SNAP State agency provides the training 1
- ❍ No, there is no training provided 0
- ❍ Policy or guidance gives local SNAP offices or E&T providers flexibility in how their staff are trained about Title VI and their language access requirements 98

ALL

E3. Do SNAP E&T providers offer services in a language other than English?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No 0

ALL

E4. How does your SNAP State agency determine in which languages to provide SNAP E&T services?

Select all that apply

- ☐ By assessing the presence of language groups in the service area using federal data 1
- ☐ By assessing the presence of language groups in the service area using State and local data 2
- ☐ By consulting community and/or faith-based organizations that serve and work with LEP communities in the service area 3
- ❍ Policy or guidance gives local SNAP offices or E&T providers flexibility in how they determine what languages SNAP E&T services are provided in 98
- ☐ Other method (please describe) 99

  [ ]

- ❍ SNAP State agency does not determine in which language to provide SNAP E&T services 0

ALL

E5. Is outreach about SNAP E&T services to LEP individuals conducted the same way it is for regular SNAP services?

- ❍ Yes 1
- ❍ No 0

IF E5 = 0

E6. How do staff in your State conduct outreach to the LEP communities about SNAP E&T services?

Select all that apply

- ☐ Posting signs in intake areas and other entry points 1
- ☐ Distributing outreach documents about SNAP services 2
- ☐ Working with community-based organizations and other stakeholders to inform LEP individuals of SNAP services 3

- ☐ Using a telephone voice mail menu 4
- ☐ Including notices in local newspapers in languages other than English 5
- ☐ Providing notices on non-English–language radio and television stations about the available SNAP services and how to get them 6
- ☐ Delivering presentations and/or notices to organizations in the community (e.g., schools, religious institutions, senior centers, community centers).....7
- ☐ Other(specify).....99

  [ ]

- ❍ Staff in the State have not conducted outreach to the LEP communities about SNAP E&T services 0

ALL

E7. Does your SNAP State agency require SNAP E&T providers to provide the following services so that LEP individuals can access SNAP E&T services?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF QUALIFIED INTERPRETER WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one per row

	YES	NO	Policy or guidance gives local SNAP offices or E&T providers flexibility in how they provide these services
a. Translation materials	1 ❍	0 ❍	98 ❍
b. Qualified interpreters	1 ❍	0 ❍	98 ❍

ALL

E8. Does the SNAP State agency or do SNAP E&T providers offer English as a Second Language (ESL) classes as an E&T component?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes 1
- ❍ No.....0

E8 = 1

E9. Do the SNAP State agency or SNAP E&T providers partner with any of the following programs to provide ESL classes as an E&T component?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Workforce Investment and Opportunity Act Title II programs 1
- ☐ D-SNAP program in state 2
- ☐ SNAP Ed program in state 3
- ☐ TANF workforce programs 4
- ☐ Other State LEP programs 5
- ☐ Other (specify) 99

ALL

E10. How do SNAP E&T services offered in other languages differ from those offered in English?

Select all that apply

- ☐ Fewer service options 1
- ☐ More individualized support 2
- ☐ Fewer community college classes 3
- ☐ Limited staff support 4
- ☐ Flexibility in guidelines for case staff 5
- ☐ Only offered at select locations 6
- ❍ There are no differences from what is offered in English 0
- ☐ Other (specify) 99

ALL

E11. Does your SNAP State agency mandate SNAP E&T participation?

- ❍ Yes 1
- ❍ No 0
- ❍ Policy or guidance gives local SNAP offices or E&T providers flexibility in whether they mandate SNAP E&T participation 98

E11 = 1

E12. Does your SNAP State agency exempt any LEP individuals from E&T participation?

Select all that apply

- ☐ Yes, we exempt all LEP individuals 1
- ☐ Yes, we exempt some LEP individuals if we cannot serve the language they speak 2
- ❍ No, we do not exempt any LEP individuals from SNAP E&T participation 0

E11 = 1

E13. How do your SNAP State agency or <u>SNAP E&T providers</u> identify LEP individuals?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Assume limited English proficiency if communication seems impaired 1
- ☐ Respond to individual requests for language assistance services 2
- ☐ The non-English speaker or LEP individual self-identifies as LEP 3
- ☐ Ask open-ended questions to determine language proficiency on the telephone or in person 4
- ☐ Use of *I Speak* language identification cards or posters 5
- ☐ Based on written material submitted to the agency (e.g., complaints) 6
- ☐ We do not identify non-English speakers or LEP individuals 7
- ☐ Other (specify) 99

ALL

E14. If an individual with limited English proficiency needed to be placed in a SNAP E&T component, how would the SNAP State agency or SNAP E&T providers accommodate this?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ LEP individuals are not placed in certain components if the provider cannot accommodate the language need 1
- ☐ We provide mostly case management services in their language 2
- ☐ We provide mostly job search assistance in their language 3
- ☐ LEP individuals are referred to ESL classes 4
- ☐ LEP individuals are exempt from mandatory SNAP E&T 5
- ☐ LEP individuals are referred to specific partners that offer components in their language 6
- ☐ Other (specify) 99

E11=1

E15. What practices do the SNAP State agency or <u>SNAP E&T providers</u> use to place LEP individuals into an appropriate component?

[DEFINITION OF SNAP E&T PROVIDERS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Done at the case manager's discretion 1
- ☐ Designating specific components as appropriate for LEP individuals 2
- ☐ Conducting an intake assessment 3
- ☐ Developing an individual employment plan for LEP individuals 4
- ☐ Other (specify) 99

E12 = 0

E16. Does your SNAP State agency use "good cause" to protect LEP individuals from adverse action if they cannot participate in programs because of language barriers?

[Hover over definition of good cause: Individuals who can present good cause for not complying with a SNAP requirement (such as a work requirement, reporting requirement, or recertification for SNAP) can continue to receive benefits after their certification period ends. Good cause can include sickness, problems with the mail, and other issues outside the household's control.]

- ❍ Yes 1
- ❍ No.....0

ALL

E_END. Thank you for completing this section. If you have more information you would like to share about SNAP E&T language access procedures in your State or Territory, please share it in the box below.

(STRING 1000)

Section 6. D-SNAP LANGUAGE ACCESS PROCEDURES

The next set of questions are about language services provided in D-SNAP programs.

ALL

F1. When was the last time your State needed to use D-SNAP?

- ❍ Less than 2 years ago 1
- ❍ 2-5 years ago 2
- ❍ Greater than 5 years ago ..... 3 SKIP OUT OF SECTION

F1 = 1 OR 2

F2. Does your State offer in-person, telephone, or online D-SNAP applications? Answer according to your State's most up to date plan, even if some policies were put in place to accommodate customers during the pandemic.

Select all that apply

- ☐ In-person D-SNAP applications 1
- ☐ Telephone D-SNAP applications 2
- ☐ Online D-SNAP applications 3

F2=1; DO NOT ASK IF F2 = MISSING

F3. How are language assistance services provided during D-SNAPs to applicants that apply in person?

[DEFINITION OF TRANSLATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF INTERPRETATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Pre-recorded informational messages are broadcasted in multiple languages at the application site 1
- ☐ Translation and interpretation services are available on site (at the application site) 2
- ☐ Translation and interpretation services are available virtually (online or by phone) 3
- ☐ Written translated materials are available on site 4
- ☐ Other (specify) 99

F2=2 ; DO NOT ASK IF F2 = MISSING

F4. How are language assistance services provided during D-SNAPs to applicants that apply by telephone?

[DEFINITION OF TRANSLATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF INTERPRETATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Telephone translation and interpretation services available.....1
- ☐ Pre-recorded informational messages are broadcast in multiple languages.....2
- ☐ Other (specify).....99

F2=3; DO NOT ASK IF F2 = MISSING

F5. How are language assistance services provided during D-SNAPs to applicants that apply online?

[DEFINITION OF TRANSLATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

[DEFINITION OF INTERPRETATION WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ Online translation and interpretation services available 1
- ☐ Video (such as Skype or Zoom) interpretation services provided by SNAP State agency 2
- ☐ Written translated materials are available online 3
- ☐ Other (specify).....99

F1 = 1 OR 2

F6. How does the SNAP State agency provide training to <u>staff providing D-SNAP services</u> about Title VI and language access requirements?

- ☐ Online trainings 1
- ☐ Conferences 2
- ☐ Group in-person trainings 3
- ☐ Group virtual trainings 4
- ☐ One-on-one virtual trainings 5
- ☐ On-the-job training *[Hover over text: On-the-job training typically involves a combination of observing others and hands-on experience under the supervision of a training manager, co-worker, or outsourced professional trainer*] 6
- ☐ Other (specify) 99

  [ ]

- ❍ No, there is no training provided 0
- ❍ IF I1b = 0: There is variation in trainings about Title VI to D-SNAP providers across counties within our State 98

F1 = 1 OR 2

F7. Does your State offer D-SNAP documents (e.g. applications, notices, etc.) in languages other than English?

- ❍ Yes 1
- ❍ No 0

F1 = 1 OR 2

F8. How does the SNAP State agency decide into which languages to have D-SNAP materials translated?

Select all that apply

- ☐ The SNAP State agency collects demographic information of potential individuals before a disaster 1
- ☐ The SNAP State agency has an up-to-date, formal pre-disaster database in place 2
- ☐ The SNAP State agency translates materials into the major languages spoken by non-English speakers in the State 3
- ☐ The same process used for the regular SNAP State program is used for D-SNAP 4
- ☐ Other (specify) 99

  [ ]

F1 = 1 OR 2

F9. Does the SNAP State agency have the necessary agreements, contracts, and memoranda of understanding (MOUs) in place to on-board qualified interpreters when needed in case of a D-SNAP?

[DEFINITION OF QUALIFIED INTERPRETER WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ❍ Yes- qualified interpreters are available for D-SNAP when needed.....1
- ❍ No- qualified interpreters are not available for D-SNAP when needed 2

F9=1

F10. How does the SNAP State agency decide in which languages to have qualified interpreters in reserve for?

[DEFINITION OF QUALIFIED INTERPRETER WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select all that apply

- ☐ The SNAP State agency collects demographic information of potential individuals before a disaster 1
- ☐ The SNAP State agency has an up-to-date, formal pre-disaster database in place.....2
- ☐ We partner with an organization or service that can provide qualified interpreters when needed 3
- ☐ The same process used for the regular SNAP State program is used for D-SNAP 4
- ☐ Other (specify).....99

F1 = 1 OR 2

F11. When language services are not available in the LEP individual's language, what strategies does your SNAP State agency use?

Select all that apply

- ☐ Refer the individual to other organizations or resources 1
- ☐ Let the individual know your agency can not help them at this time.....2
- ☐ Work with the individual but not in their preferred language- it is up to them to get the materials translated by a friend or family member.....3
- ☐ Find someone who can interpret or translate and offer their services to the individual free of charge.....4
- ☐ Other (specify).....99

F1 = 1 OR 2

F12. How does the SNAP State agency decide in which languages D-SNAP outreach should take place?

Select all that apply

- ☐ The SNAP State agency collects demographic information of potential individuals before a disaster 1
- ☐ The SNAP State agency has an up-to-date, formal pre-disaster database in place 2
- ☐ The SNAP State agency translates materials into the major languages spoken by non-English speakers in the State 3
- ☐ The same process is used for D-SNAP as is used for the regular SNAP program 4
- ☐ Other (specify) 99

F1 = 1 OR 2

F_END. Thank you for completing this section. If you have more information you would like to share about D-SNAP language access procedures in your State or Territory, please share it in the box below.

(STRING 1000)

SECTION 7. SNAP-ED LANGUAGE ACCESS PROCEDURES

The next questions are about the language assistance services provided in SNAP-Ed.

ALL

G1. How are SNAP-Ed contractors informed of Title VI and their language access requirements by the SNAP State agency?

[Hover over definition of SNAP-Ed contractors: SNAP-Ed contractors are the management entities providing the services to customers.]

Select all that apply

- ☐ Virtual meetings 1
- ☐ In-person meetings 2
- ☐ SNAP *internal* website 3
- ☐ SNAP *external* website 4
- ☐ Email updates 5
- ☐ Updates sent by mail (e.g., brochures and memos) 6
- ☐ Phone call to SNAP-Ed providers 7
- ☐ Other (specify) 99

  [ ]

- ❍ SNAP State agency does not have a way to inform SNAP-Ed contractors of Title VI and language access requirements 0

ALL

G2. Does the SNAP State agency provide training to SNAP-Ed contractors about Title VI and their language access requirements?

[DEFINITION OF SNAP-ED CONTRACTORS WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

- ☐ Online trainings 1
- ☐ Conferences 2
- ☐ Group in-person trainings 3
- ☐ Group virtual trainings 4
- ☐ One-on-one virtual trainings 5
- ☐ On-the-job training *[Hover over text: On-the-job training typically involves a combination of observing others and hands-on experience under the supervision of a training manager, co-worker, or outsourced professional trainer*] 6
- ☐ Other (specify) 99

  [ ]

- ❍ No, there is no training provided 0
- ❍ IF I1b = 0: There is variation in trainings about Title VI to SNAP-Ed contractors across counties within our State 98

ALL

G3. Does the SNAP State agency require SNAP-Ed contractors to the following types of services so that LEP individuals can access SNAP-Ed opportunities?

[DEFINITION OF SNAP-ED CONTRACTORS AND QUALIFIED INTERPRETER WILL DISPLAY WHEN RESPONDENT HOVERS OVER UNDERLINED TERM]

Select one per row

	YES	NO
a. Translated materials	1 ❍	0 ❍
b. Qualified interpreters	1 ❍	0 ❍

ALL

G4. Do SNAP-Ed contractors offer SNAP-Ed documents (e.g. applications, notices, etc.) in languages other than English?

- ❍ Yes 1
- ❍ No.....0

ALL

G_END. Thank you for completing this section. If you have more information you would like to share about SNAP Ed language access procedures in your State or Territory, please share it in the box below.

(STRING 1000)

END. You have completed all the sections. Thank you for your time on this important survey.

Appendix E

American Community Survey Limited English Proficiency Data Tables

Table 1. Limited English proficiency individuals by State for the total population and the population with incomes at or under 130% of the federal poverty line

State	Total population age 5 and over	Population with Limited English Proficiency	Share LEP	Total population age 5 and over at or under 130% of FPL	Population with Limited English Proficiency under at or under 130% of FPL	Share LEP at or under 130% of FPL
Alabama	4,599,994	97,437	2.1%	970,223	36,389	3.8%
Alaska	685,313	32,253	4.7%	93,914	6,414	6.8%
Arizona	6,742,955	562,650	8.3%	1,256,134	179,731	14.3%
Arkansas	2,823,864	91,876	3.3%	615,806	27,896	4.5%
California	36,941,766	6,488,420	17.6%	6,364,363	1,725,832	27.1%
Colorado	5,354,718	295,725	5.5%	713,291	70,246	9.8%
Connecticut	3,388,100	275,271	8.1%	431,445	72,567	16.8%
Delaware	912,793	43,224	4.7%	134,543	11,855	8.8%
District of Columbia	657,220	37,612	5.7%	118,678	10,335	8.7%
Florida	20,084,426	2,389,671	11.9%	3,705,040	695,461	18.8%
Georgia	9,865,114	540,377	5.5%	1,866,633	162,068	8.7%
Hawaii	1,331,788	152,871	11.5%	163,229	27,128	16.6%
Idaho	1,640,623	59,721	3.6%	275,188	17,829	6.5%
Illinois	11,962,121	1,010,859	8.5%	1,889,761	239,702	12.7%
Indiana	6,280,159	201,272	3.2%	1,071,986	56,201	5.2%
Iowa	2,954,413	101,543	3.4%	436,722	26,817	6.1%
Kansas	2,724,173	124,965	4.6%	428,970	35,211	8.2%
Kentucky	4,188,962	95,788	2.3%	898,938	33,490	3.7%
Louisiana	4,359,940	121,909	2.8%	1,035,666	41,166	4.0%
Maine	1,277,189	18,328	1.4%	198,272	5,053	2.5%
Maryland	5,674,415	394,198	6.9%	672,916	78,472	11.7%
Massachusetts	6,515,463	610,126	9.4%	848,374	170,585	20.1%
Michigan	9,406,817	316,126	3.4%	1,673,780	98,614	5.9%
Minnesota	5,251,101	230,547	4.4%	669,392	70,691	10.6%
Mississippi	2,796,737	45,677	1.6%	702,786	13,372	1.9%
Missouri	5,753,729	123,328	2.1%	1,003,800	36,087	3.6%
Montana	1,000,334	9,671	1.0%	178,197	3,217	1.8%
Nebraska	1,793,425	93,399	5.2%	260,037	29,290	11.3%
Nevada	2,846,562	321,896	11.3%	508,354	81,774	16.1%
New Hampshire	1,291,659	32,875	2.5%	129,420	8,016	6.2%
New Jersey	8,367,289	1,016,574	12.1%	1,067,807	241,194	22.6%
New Mexico	1,973,615	170,791	8.7%	486,621	66,886	13.7%
New York	18,376,459	2,425,152	13.2%	3,240,860	745,416	23.0%
North Carolina	9,781,471	430,137	4.4%	1,845,437	146,916	8.0%
North Dakota	706,912	13,184	1.9%	98,486	4,123	4.2%
Ohio	10,982,849	275,564	2.5%	1,921,103	83,919	4.4%
Oklahoma	3,691,100	140,170	3.8%	752,449	42,498	5.6%
Oregon	3,948,126	216,573	5.5%	661,184	60,261	9.1%
Pennsylvania	12,095,037	534,515	4.4%	1,899,393	170,054	9.0%
Rhode Island	1,003,110	83,750	8.3%	147,667	24,698	16.7%
South Carolina	4,799,820	134,074	2.8%	934,526	44,221	4.7%
South Dakota	819,740	17,679	2.2%	134,992	4,825	3.6%

State	Total population age 5 and over	Population with Limited English Proficiency	Share LEP	Total population age 5 and over at or under 130% of FPL	Population with Limited English Proficiency under at or under 130% of FPL	Share LEP at or under 130% of FPL
Tennessee	6,366,031	190,213	3.0%	1,222,235	65,665	5.4%
Texas	26,639,335	3,586,177	13.5%	5,106,611	1,170,691	22.9%
Utah	2,902,668	133,533	4.6%	381,482	33,856	8.9%
Vermont	595,164	7,568	1.3%	88,081	1,841	2.1%
Virginia	8,001,561	466,114	5.8%	1,058,946	93,753	8.9%
Washington	7,058,723	535,421	7.6%	971,479	129,939	13.4%
West Virginia	1,712,054	12,720	0.7%	380,321	3,028	0.8%
Wisconsin	5,477,407	169,563	3.1%	789,943	47,084	6.0%
Wyoming	546,138	9,958	1.8%	79,592	3,132	3.9%
Puerto Rico	3,124,748	2,375,042	76.0%	1,658,501	1,377,149	83.0%

Source: American Community Survey 5-year data, 2016-2020; Puerto Rican Community Survey 5-year data, 2016-2020.

Notes: Limited English Proficiency (LEP) includes those that speak English less than very well (well, not well, and not at all). LEP status is only available for those age 5 and over. Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility.

Table 2. Share of limited English proficiency individuals with incomes at or under 130% of the federal poverty line by State by age group

State	Total LEP population age 18 and over; at or under 130% of FPL	Share of population 18 and over at or under 130% FPL who are LEP	Total LEP population age 5-17; at or under 130% of FPL	Share of population age 5-17 at or under 130% FPL who are LEP
Alabama	30,584	4.1%	5,805	2.5%
Alaska	5,261	7.3%	1,153	5.3%
Arizona	160,299	17.2%	19,432	6.0%
Arkansas	22,773	4.9%	5,123	3.4%
California	1,519,453	31.7%	206,379	13.2%
Colorado	61,025	10.9%	9,221	6.0%
Connecticut	65,535	19.6%	7,032	7.3%
Delaware	9,887	9.5%	1,968	6.4%
District of Columbia	8,414	8.9%	1,921	8.0%
Florida	633,106	21.8%	62,355	7.8%
Georgia	132,204	9.6%	29,864	6.0%
Hawaii	23,850	18.3%	3,278	9.9%
Idaho	14,435	6.9%	3,394	5.0%
Illinois	208,977	14.6%	30,725	6.7%
Indiana	46,913	5.8%	9,288	3.5%
Iowa	23,596	6.9%	3,221	3.4%
Kansas	31,066	9.5%	4,145	4.1%
Kentucky	26,502	3.8%	6,988	3.4%
Louisiana	34,839	4.5%	6,327	2.4%
Maine	4,358	2.7%	695	2.0%
Maryland	67,685	13.1%	10,787	6.9%
Massachusetts	155,234	22.8%	15,351	9.2%
Michigan	85,163	6.6%	13,451	3.5%
Minnesota	58,194	11.3%	12,497	8.2%

State	Total LEP population age 18 and over; at or under 130% of FPL	Share of population 18 and over at or under 130% FPL who are LEP	Total LEP population age 5-17; at or under 130% of FPL	Share of population age 5-17 at or under 130% FPL who are LEP
Mississippi	10,334	2.0%	3,038	1.7%
Missouri	28,816	3.8%	7,271	3.1%
Montana	2,681	1.9%	536	1.5%
Nebraska	22,560	11.4%	6,730	10.9%
Nevada	71,738	18.7%	10,036	8.0%
New Hampshire	6,799	6.3%	1,217	5.5%
New Jersey	217,286	26.8%	23,908	9.4%
New Mexico	58,611	16.0%	8,275	6.9%
New York	645,348	25.6%	100,068	13.8%
North Carolina	122,147	8.8%	24,769	5.5%
North Dakota	3,660	4.6%	463	2.4%
Ohio	70,619	4.8%	13,300	2.9%
Oklahoma	35,477	6.4%	7,021	3.6%
Oregon	50,709	9.6%	9,552	7.1%
Pennsylvania	143,761	9.8%	26,293	6.1%
Rhode Island	21,976	18.5%	2,722	9.4%
South Carolina	36,008	5.1%	8,213	3.6%
South Dakota	3,928	3.9%	897	2.7%
Tennessee	52,315	5.6%	13,350	4.6%
Texas	943,636	26.0%	227,055	15.4%
Utah	29,541	10.4%	4,315	4.4%
Vermont	1,565	2.2%	276	1.8%
Virginia	81,549	10.0%	12,204	5.0%
Washington	109,373	14.4%	20,566	9.7%
West Virginia	2,588	0.9%	440	0.6%
Wisconsin	37,531	6.1%	9,553	5.4%
Wyoming	2,771	4.3%	361	2.4%
Puerto Rico	1,122,388	83.0%	254,761	83.1%

Source: American Community Survey 5-year data, 2016-2020; Puerto Rican Community Survey 5-year data, 2016-2020.

Notes: Limited English Proficiency (LEP) includes those that speak English less than very well (well, not well, and not at all). LEP status is only available for those age 5 and over. Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility.

Table 3. Most common languages spoken by limited English proficiency individuals with incomes at or under 130% of the federal poverty line in the 50 States and D.C. (only languages with more than 3,000 speakers shown).

Language	Number of speakers (population at or under 130% FPL)
Spanish	4,981,011
Chinese (Chinese, Mandarin, and Cantonese)	457,870
Arabic	204,505
Vietnamese	184,611
Korean	112,980
Russian	109,345
Haitian	82,340
Portuguese	59,781
French	58,611
Bengali	47,157
Yiddish	45,776
Tagalog	42,792
Farsi	42,753
Somali	39,275
Urdu	37,067
Armenian	36,164
Nepali	31,356
Polish	27,651
German	27,021
Hmong	27,002
Japanese	24,718
Khmer	23,397
Hindi	22,845
Burmese	22,783
Italian	21,185
Amharic	20,660
Punjabi	20,216
Swahili	18,951
Karen languages	18,008
Gujarati	17,288
Navajo	17,276
Thai	17,036
Ukrainian	16,441
Pennsylvania German	15,726
Turkish	12,643
Filipino	12,185
Lao	12,177
Albanian	11,835
Other Bantu languages	11,724
Other Central and South American languages	11,519
Pashto	11,240
Dari	9,209
Romanian	9,003
Tigrinya	8,687

Language	Number of speakers (population at or under 130% FPL)
Greek	8,440
Other languages of Asia	8,183
Min Nan Chinese	7,767
Bosnian	7,305
Chin languages	7,247
Hebrew	6,469
Kurdish	6,331
Chaldean Neo-Aramaic	5,733
Marshallese	5,711
Dutch	5,493
Telugu	5,462
Akan (incl. Twi)	5,371
Other Afro-Asiatic languages	5,019
Indonesian	4,977
Yoruba	4,836
Ilocano	4,504
Assyrian Neo-Aramaic	4,390
Nilo-Saharan languages	4,044
Malayalam	3,940
Other languages of Africa	3,937
Igbo	3,814
Chuukese	3,734
Tamil	3,570
Hungarian	3,442
Other Mande languages	3,437
Oromo	3,397
Other Native North American languages	3,391
Other Eastern Malayo-Polynesian languages	3,288
India N.E.C.	3,261
Other Niger-Congo languages	3,123

Source: American Community Survey 5-year data, 2016-2020.

Notes: Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility. The top ten most commonly spoken languages in some States includes languages not shown on this table.

Table 4. Top five languages spoken among the limited English proficiency population with incomes at or under 130% of the federal poverty line in each State and number of speakers

State	Most common		Second		Third		Fourth		Fifth	
	Language	Speakers	Language	Speakers	Language	Speakers	Language	Speakers	Language	Speakers
Alabama	Spanish	28,458	Chinese	1,365	Arabic	1,051	Korean	967	Vietnamese	666
Alaska	Hmong	1,626	Spanish	1,413	Aleut languages	945	Tagalog	675	Chinese	370
Arizona	Spanish	140,161	Navajo	10,701	Arabic	5,602	Chinese	4,553	Vietnamese	2,366
Arkansas	Spanish	21,896	Marshallese	1,635	Chinese	705	Arabic	697	Vietnamese	439
California	Spanish	1,193,132	Chinese	145,712	Vietnamese	80,922	Korean	42,735	Armenian	34,255
Colorado	Spanish	51,895	Chinese	2,939	Vietnamese	1,909	Arabic	1,608	French	1,115
Connecticut	Spanish	52,342	Portuguese	3,073	Chinese	2,137	Haitian	1,770	Arabic	1,493
Delaware	Spanish	8,417	Chinese	989	Haitian	474	Swahili	258	Vietnamese	197
District of Columbia	Spanish	6,538	Chinese	1,298	Amharic	898	French	399	Vietnamese	330
Florida	Spanish	559,021	Haitian	50,608	Portuguese	13,313	Chinese	10,036	Vietnamese	7,945
Georgia	Spanish	116,974	Chinese	6,434	Vietnamese	4,746	Korean	4,202	Arabic	2,296
Hawaii	Chinese	4,670	Japanese	3,422	Chuukese	3,044	Ilocano	2,598	Korean	2,370
Idaho	Spanish	13,587	Arabic	1,303	Chinese	621	Vietnamese	279	Ukrainian	245
Illinois	Spanish	150,662	Chinese	14,536	Polish	12,238	Arabic	9,506	Russian	5,024
Indiana	Spanish	32,968	Chinese	4,612	Burmese	3,889	Arabic	2,042	German	1,439
Iowa	Spanish	11,344	Chinese	2,423	Arabic	1,898	Karen languages	1,268	French	953
Kansas	Spanish	23,662	Chinese	2,042	Arabic	1,167	Nepali	1,108	Burmese	1,099
Kentucky	Spanish	16,484	Arabic	2,248	Nepali	1,414	Somali	1,105	Other Bantu languages	934
Louisiana	Spanish	28,380	Vietnamese	3,433	French	2,089	Arabic	1,785	Chinese	1,065
Maine	French	1,302	Somali	533	Spanish	480	Chinese	431	Other Bantu languages	402
Maryland	Spanish	42,398	Chinese	5,744	Korean	3,987	Arabic	3,051	French	3,028
Massachusetts	Spanish	89,521	Chinese	21,826	Portuguese	14,348	Haitian	7,193	Arabic	6,154
Michigan	Arabic	31,073	Spanish	26,965	Chinese	6,498	Bengali	5,521	Chaldean Neo-Aramaic	3,317
Minnesota	Spanish	20,500	Somali	16,807	Hmong	7,491	Karen languages	4,870	Chinese	2,787
Mississippi	Spanish	9,581	Arabic	814	Chinese	808	Vietnamese	595	Muskogean languages	261
Missouri	Spanish	15,660	Chinese	3,461	Arabic	2,557	Vietnamese	1,504	German	1,283
Montana	Spanish	980	Other Native North American languages	376	Vietnamese	356	Arabic	353	Tagalog	333
Nebraska	Spanish	18,530	Somali	1,820	Karen languages	1,335	Nepali	1,301	Arabic	1,152
Nevada	Spanish	65,922	Chinese	2,937	Tagalog	1,881	Korean	1,396	Vietnamese	1,197
New Hampshire	Spanish	3,058	Arabic	961	Nepali	755	Other Bantu languages	604	French	495
New Jersey	Spanish	170,277	Chinese	8,752	Arabic	8,338	Portuguese	7,332	Korean	6,071

State	Most common		Second		Third		Fourth		Fifth	
	Language	Speakers	Language	Speakers	Language	Speakers	Language	Speakers	Language	Speakers
New Mexico	Spanish	54,778	Navajo	5,771	Other Native North American languages	1,576	Keres	817	Arabic	726
New York	Spanish	375,877	Chinese	120,673	Yiddish	45,218	Russian	38,352	Bengali	23,861
North Carolina	Spanish	113,488	Arabic	5,059	Chinese	3,286	Vietnamese	2,033	Karen languages	1,788
North Dakota	Spanish	1,326	Nepali	939	French	290	Somali	182	Dakota languages	170
Ohio	Spanish	33,554	Arabic	8,389	Chinese	6,241	Nepali	3,979	Somali	3,816
Oklahoma	Spanish	32,616	Vietnamese	1,754	Chinese	1,185	Chin languages	833	Arabic	783
Oregon	Spanish	37,860	Chinese	4,270	Vietnamese	3,376	Russian	2,975	Arabic	1,431
Pennsylvania	Spanish	94,483	Chinese	16,272	Arabic	5,897	Vietnamese	5,478	Russian	5,271
Rhode Island	Spanish	18,072	Portuguese	1,439	Chinese	1,036	Haitian	749	Arabic	652
South Carolina	Spanish	34,937	Chinese	1,942	Arabic	791	Russian	725	Portuguese	450
South Dakota	Spanish	1,907	Dakota languages	545	Karen languages	393	Other Native North American languages	276	Amharic	250
Tennessee	Spanish	44,420	Arabic	6,300	Kurdish	1,624	Chinese	1,553	Vietnamese	825
Texas	Spanish	1,040,370	Vietnamese	25,660	Chinese	16,278	Arabic	15,249	Korean	5,909
Utah	Spanish	22,380	Chinese	1,458	Portuguese	1,331	Arabic	777	Vietnamese	764
Vermont	Nepali	550	Burmese	221	Chinese	158	Other Afro-Asiatic languages	142	French	131
Virginia	Spanish	55,482	Chinese	6,007	Arabic	5,269	Korean	4,019	Vietnamese	3,100
Washington	Spanish	65,105	Chinese	12,076	Vietnamese	7,126	Russian	6,354	Korean	5,451
West Virginia	Spanish	1,154	Arabic	586	Chinese	351	Tamil	232	French	148
Wisconsin	Spanish	28,283	Hmong	3,579	Chinese	2,230	German	1,964	Arabic	1,509
Wyoming	Spanish	2,531	Chinese	220	Japanese	73	French	64	German	47
Puerto Rico	Spanish	1,376,414	Chinese	410	Italian	91	French	69	Japanese	53

Source: American Community Survey 5-year data, 2016-2020; Puerto Rican Community Survey 5-year data, 2016-2020.

Notes: Limited English Proficiency (LEP) includes those that speak English less than very well (well, not well, and not at all). LEP status is only available for those age 5 and over. Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility. “Chinese” includes Chinese, Mandarin, and Cantonese.

Table 5. Island Areas limited English proficiency status by age group

Island Area	Total population age 5 and over	Population with Limited English Proficiency	Share LEP	Total population age 5-17 LEP	Share of population 5-17 LEP	Total population age 18-64 LEP	Share of population 18-64 LEP	Total population 65 and older LEP	Share of population over 65 and older LEP
US Virgin Islands	80,430	7,211	9.0%	682	5.4%	5318	10.80%	1,211	6.60%
American Samoa	44,174	23,319	52.8%	8,189	60.0%	13482	49.20%	1,648	52.9%
Guam	135,770	26,552	19.6%	2,724	9.1%	18383	20.70%	5,445	32.10%
Commonwealth of the Northern Mariana Islands	44,111	15,512	35.2%	1,202	11.6%	12944	41.90%	1,366	48.90%

Source: 2020 Decennial Census of Island Areas, table DP2.

Notes: Guam population excludes military housing units.

Table 6. Island Areas, top languages spoken at home by individuals with limited English proficiency

Island Area	Top Languages Spoken at Home, LEP individuals							
	Language	Speakers	Language	Speakers	Language	Speakers	Language	Speakers
US Virgin Islands	Spanish	4,498	French, Haitian, or Creole	2,218				
American Samoa	Samoan	9,238						
Guam	Philippine languages	13,464	Other Pacific Island languages	5,681	Other Asian languages	4,241	Chamorro	2,839
Commonwealth of the Northern Mariana Islands	Philippine languages	6,879	Chamorro	2,613				

Source: 2020 Decennial Census of Island Areas, table PC25.

Table 7. Gender, Citizenship, and Race/Ethnicity; individuals with limited English proficiency population age 5 and over with incomes at or under 130% of the federal poverty line

State	Percent Female	Percent US Citizen	Race/Ethnicity (percent)							
			Hispanic/ Latinx	Non-Hispanic White	Black or African American	American Indian/Alaska Native	Asian	Native Hawaiian and other Pacific Islander	Some other race alone	Two or more races (non-Hispanic)
Alabama	51%	33%	76.0%	6.3%	3.1%	0.0%	13.2%	0.0%	0.2%	1.1%
Alaska	55%	63%	20.7%	7.2%	2.5%	16.8%	48.6%	3.8%	0.0%	0.5%
Arizona	57%	44%	76.4%	5.8%	2.8%	7.0%	7.0%	0.1%	0.0%	0.9%
Arkansas	54%	31%	76.2%	4.7%	0.7%	0.0%	9.2%	6.4%	1.7%	1.1%
California	57%	45%	68.9%	7.8%	0.6%	0.0%	21.3%	0.1%	0.2%	1.0%
Colorado	58%	39%	72.4%	8.0%	5.1%	0.1%	13.2%	0.1%	0.1%	0.9%
Connecticut	59%	58%	71.7%	12.2%	4.6%	0.0%	9.6%	0.0%	0.9%	1.0%
Delaware	58%	41%	69.5%	4.6%	8.8%	0.0%	15.8%	0.0%	0.0%	1.3%
District of Columbia	59%	43%	60.2%	2.5%	17.6%	0.1%	17.5%	0.0%	1.1%	1.0%
Florida	58%	50%	79.6%	6.6%	8.0%	0.0%	4.8%	0.0%	0.4%	0.4%
Georgia	53%	35%	69.8%	6.2%	5.6%	0.1%	16.7%	0.0%	0.6%	1.0%
Hawaii	62%	52%	5.3%	2.0%	0.0%	0.4%	62.6%	25.4%	0.0%	4.3%
Idaho	52%	45%	74.5%	15.3%	1.8%	0.5%	5.3%	0.6%	1.2%	0.9%
Illinois	56%	46%	61.9%	16.8%	3.0%	0.0%	16.8%	0.0%	0.2%	1.3%
Indiana	53%	36%	56.0%	14.4%	4.5%	0.0%	23.5%	0.1%	0.3%	1.1%
Iowa	54%	37%	41.1%	13.6%	15.4%	0.0%	25.9%	2.0%	1.4%	0.6%
Kansas	56%	32%	66.0%	5.4%	6.2%	0.0%	20.7%	0.0%	0.1%	1.6%
Kentucky	52%	31%	48.6%	15.3%	14.5%	0.0%	19.4%	0.2%	0.1%	1.9%
Louisiana	52%	39%	66.4%	11.3%	3.2%	0.4%	17.9%	0.0%	0.2%	0.5%
Maine	64%	58%	7.7%	29.3%	35.1%	0.7%	24.1%	0.0%	0.0%	3.0%
Maryland	59%	39%	53.2%	10.8%	12.1%	0.0%	22.2%	0.0%	0.3%	1.4%
Massachusetts	59%	54%	52.4%	15.5%	7.6%	0.0%	21.3%	0.0%	1.6%	1.6%
Michigan	53%	48%	25.9%	44.6%	5.1%	0.3%	21.6%	0.0%	0.3%	2.2%
Minnesota	56%	52%	28.3%	8.4%	32.0%	0.3%	29.0%	0.2%	0.3%	1.4%
Mississippi	54%	48%	58.7%	16.3%	5.3%	2.0%	15.9%	0.0%	1.1%	0.8%
Missouri	53%	43%	41.7%	21.3%	9.6%	0.0%	23.7%	1.5%	0.3%	2.0%
Montana	53%	48%	28.3%	29.2%	0.0%	6.5%	32.0%	2.0%	0.0%	2.1%
Nebraska	54%	32%	63.3%	4.4%	12.5%	0.0%	18.4%	0.1%	0.0%	1.4%
Nevada	58%	36%	80.1%	4.4%	2.2%	0.1%	12.3%	0.1%	0.2%	0.5%
New Hampshire	57%	45%	37.3%	18.7%	15.9%	0.0%	27.0%	0.0%	0.3%	0.7%
New Jersey	59%	48%	70.0%	11.3%	4.4%	0.0%	12.7%	0.0%	0.7%	0.9%
New Mexico	57%	59%	81.2%	2.2%	0.9%	12.8%	2.3%	0.0%	0.0%	0.5%
New York	58%	56%	50.0%	18.4%	4.2%	0.1%	25.9%	0.0%	0.4%	1.1%
North Carolina	56%	30%	75.8%	6.0%	4.9%	0.0%	11.5%	0.2%	0.5%	1.1%
North Dakota	54%	42%	27.9%	19.6%	13.3%	6.9%	31.6%	0.0%	0.6%	0.2%
Ohio	53%	52%	38.3%	25.1%	13.2%	0.1%	21.1%	0.0%	0.2%	2.0%
Oklahoma	52%	33%	74.0%	5.5%	3.0%	1.6%	12.6%	1.2%	0.2%	1.9%
Oregon	54%	39%	62.6%	12.2%	2.9%	0.1%	20.2%	1.1%	0.1%	0.8%
Pennsylvania	56%	62%	54.5%	17.2%	5.0%	0.0%	21.5%	0.0%	0.4%	1.2%
Rhode Island	57%	57%	73.6%	12.4%	5.0%	0.0%	6.5%	0.0%	1.7%	0.8%
South Carolina	51%	34%	75.6%	9.5%	3.0%	0.0%	9.9%	0.1%	0.7%	1.0%

State	Percent Female	Percent US Citizen	Race/Ethnicity (percent)							
			Hispanic/ Latinx	Non-Hispanic White	Black or African American	American Indian/Alaska Native	Asian	Native Hawaiian and other Pacific Islander	Some other race alone	Two or more races (non-Hispanic)
South Dakota	57%	37%	39.2%	11.9%	13.7%	15.8%	17.7%	0.1%	0.0%	1.7%
Tennessee	51%	36%	64.8%	16.6%	6.0%	0.1%	9.8%	0.0%	0.8%	1.9%
Texas	55%	43%	88.1%	2.8%	1.9%	0.0%	6.6%	0.0%	0.1%	0.4%
Utah	54%	34%	64.6%	9.3%	4.9%	2.2%	14.7%	2.2%	0.9%	1.1%
Vermont	58%	31%	6.9%	24.8%	13.1%	0.6%	46.8%	0.0%	0.0%	7.8%
Virginia	58%	35%	57.4%	11.2%	7.1%	0.0%	21.6%	0.0%	0.1%	2.5%
Washington	56%	41%	50.1%	12.7%	7.3%	0.1%	26.2%	1.3%	0.7%	1.7%
West Virginia	44%	48%	23.0%	41.8%	2.0%	0.0%	24.0%	0.0%	8.0%	1.2%
Wisconsin	55%	53%	56.2%	18.1%	3.0%	0.2%	21.2%	0.0%	0.3%	1.0%
Wyoming	49%	27%	76.8%	11.6%	0.0%	0.7%	9.4%	0.4%	0.0%	1.1%
Puerto Rico	55%	98%	99.2%	0.5%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%

Source: American Community Survey 5-year data, 2016-2020; Puerto Rican Community Survey 5-year data, 2016-2020.

Notes: Limited English Proficiency (LEP) includes those that speak English less than very well (well, not well, and not at all). LEP status is only available for those age 5 and over. Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility.

Table 8. Education level, individuals with limited English proficiency age 18 and over with incomes at or under 130% of the federal poverty line

State	Less than High School	High School Diploma or GED	Some College, including Associate's Degree	Bachelor's Degree or Higher
Alabama	54.7%	23.2%	12.5%	9.6%
Alaska	36.0%	38.5%	22.5%	3.0%
Arizona	55.0%	24.9%	14.3%	5.9%
Arkansas	56.7%	27.5%	7.6%	8.2%
California	56.1%	22.4%	12.5%	9.1%
Colorado	52.4%	25.0%	12.7%	9.9%
Connecticut	47.8%	29.4%	13.2%	9.6%
Delaware	47.4%	31.7%	10.3%	10.7%
District of Columbia	52.7%	19.2%	12.6%	15.6%
Florida	38.4%	31.8%	15.8%	13.9%
Georgia	53.2%	24.3%	11.6%	10.8%
Hawaii	39.1%	29.7%	19.3%	11.8%
Idaho	52.8%	26.1%	12.4%	8.6%
Illinois	44.4%	28.6%	13.2%	13.8%
Indiana	49.8%	24.4%	13.9%	11.9%
Iowa	46.2%	26.5%	15.6%	11.7%
Kansas	52.2%	24.5%	14.9%	8.4%
Kentucky	48.1%	29.3%	12.5%	10.1%
Louisiana	48.7%	28.5%	14.3%	8.6%
Maine	22.8%	37.8%	20.8%	18.6%
Maryland	44.5%	25.1%	14.3%	16.0%
Massachusetts	44.1%	27.5%	14.7%	13.7%
Michigan	43.3%	24.0%	16.6%	16.1%
Minnesota	53.4%	24.2%	14.7%	7.7%
Mississippi	48.4%	30.6%	10.6%	10.5%
Missouri	38.7%	25.1%	18.5%	17.8%
Montana	28.0%	20.4%	23.3%	28.2%
Nebraska	58.4%	20.3%	12.1%	9.2%
Nevada	50.6%	27.9%	12.8%	8.7%
New Hampshire	40.5%	29.1%	14.0%	16.4%
New Jersey	42.6%	31.8%	13.6%	12.1%
New Mexico	56.5%	25.0%	14.0%	4.5%
New York	47.2%	26.7%	13.7%	12.3%
North Carolina	57.2%	24.2%	10.6%	8.0%
North Dakota	37.9%	18.9%	22.3%	20.8%
Ohio	42.6%	26.5%	16.2%	14.7%
Oklahoma	55.9%	25.6%	10.9%	7.7%
Oregon	53.4%	22.5%	14.3%	9.7%
Pennsylvania	43.1%	30.4%	13.3%	13.1%
Rhode Island	47.1%	35.4%	9.2%	8.2%
South Carolina	52.5%	28.6%	9.6%	9.3%
South Dakota	36.5%	35.0%	17.7%	10.7%
Tennessee	48.8%	28.8%	11.2%	11.2%
Texas	60.4%	22.3%	10.1%	7.2%
Utah	46.4%	24.3%	15.9%	13.5%

State	Less than High School	High School Diploma or GED	Some College, including Associate's Degree	Bachelor's Degree or Higher
Vermont	53.6%	24.0%	5.0%	17.4%
Virginia	42.4%	27.4%	14.1%	16.1%
Washington	48.3%	22.3%	16.8%	12.7%
West Virginia	18.1%	44.9%	31.4%	5.6%
Wisconsin	45.4%	27.5%	17.9%	9.2%
Wyoming	49.4%	23.8%	12.2%	14.6%
Puerto Rico	32.5%	34.3%	23.4%	9.9%

Source: American Community Survey 5-year data, 2016-2020; Puerto Rican Community Survey 5-year data, 2016-2020.

Notes: Limited English Proficiency (LEP) includes those that speak English less than very well (well, not well, and not at all). LEP status is only available for those age 5 and over. Income at 130% of the federal poverty line or under is a rough approximation of SNAP eligibility.