

J3. Federal Register Comment from Hunger Free Vermont

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Food and Nutrition Service, U.S. Dept. of Agriculture
attn: Eric Williams
1320 Braddock Place
Alexandria, VA 22314

Submitted via email to eric.williams@usda.gov

RE: Comment Request - Serving SNAP Applicants and Participants With Limited English Proficiency (87 FR 41101)

To Whom It May Concern:

We take this opportunity to comment in support of USDA's proposed information collection for the contract Serving Supplementation Nutrition Assistance Program (SNAP) Applicants and Participants with Limited English Proficiency (LEP). A comprehensive evaluation of states' practices of serving LEP persons is greatly needed in order to improve access to and utilization of SNAP for eligible LEP individuals. Without this study, many states, including Vermont, will struggle to evaluate and ultimately improve practices to ensure equitable, meaningful service delivery to LEP individuals.

Hunger Free Vermont is a statewide nonprofit with the mission to end the injustice of hunger and malnutrition for all Vermonters. We work in collaboration with federal, state, and community partners to find sustainable solutions that allow Vermonters to access food through dignified means and traditional channels. For over 25 years, we have seen the critical importance of federal nutrition programs like SNAP in our fight against hunger in Vermont.

SNAP plays a critical role in addressing hunger and food insecurity in Vermont. It is proven to reduce hunger, lift people out of poverty, and lead to positive short and long-term health, education, and employment outcomes; and yet, according to Census Data from 2020, roughly 45% of Vermonters potentially income-eligible for 3SquaresVT are enrolled in the program. In order to serve all eligible Vermonters with integrity, dignity, and accuracy, states must receive federal guidance and support to understand and address the causes of under enrollment in SNAP, including existing language barriers. Based on data from Spring 2022¹, we know that food insecurity has increased in the last two years during the COVID-19 pandemic. We expect to see hunger continue to grow as the full economic impact is felt, exacerbated by rising inflation, and the end of COVID-era nutrition program flexibilities. Access to SNAP is critical in this time, and should be *easily* accessible to all eligible individuals.

Between 2000-2019, Vermont saw an 82% increase in LEP individuals², the vast majority of whom are Foreign Born individuals—including naturalized U.S. citizens, lawful permanent residents, refugees and asylees. Of the total 2019 Foreign-born Vermont population (28,897), 30.8% (8,900) were LEP individuals. In Vermont, the SNAP application is only available in English, due to barriers in technology to process applications in other languages. Interpretation services provided by the State for non-English speakers are unreliable—with regular incidents of dropped calls and long wait times. The State is aware of these language barriers and continues to seek equitable resolutions; however, limited funding and capacity to improve technology systems are a chronic hindrance to progress.

¹ <https://scholarworks.uvm.edu/calsfac/192/>

² <https://www.migrationpolicy.org/data/state-profiles/state/language/VT>

FNS should collect information from states on serving LEP individuals and be sure to ask states about the barriers they face in equitable service delivery to LEP individuals, as well as the support needed to resolve barriers—technology improvement and increased funding as potential suggestions—in order to improve service to LEP individuals. We encourage FNS to ask states about the average wait times for interpretation service calls, rates of dropped calls, and for a broad assessment of the efficacy of interpretation lines. As plans are developed for which states to engage in information collection, we encourage FNS to ensure a selection of states that reflect the populations across the country—including rural states serving LEP individuals.

Additionally, we encourage FNS to broaden the case studies to reach additional stakeholders, including LEP individuals who have applied for SNAP. Their experiences with the application process are critical for FNS to hear in order to fully understand the barriers LEP individuals face in accessing SNAP and opportunities for improvement. Similarly, the case studies should include those who support clients in accessing SNAP, like case managers, application assistants, and attorneys. These important perspectives will not be captured if the case studies are limited to agency staff and management.

Hunger Free Vermont supports the proposed information collection to ensure equitable, meaningful service delivery to LEP individuals and encourages FNS to consider rural states serving LEP community members when considering resources, as common barriers to accessing support are often exacerbated by the unique challenges facing rural states.

Sincerely,

Ivy Enoch
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