





United States Department of Agriculture

Food and Nutrition Service

Dear Ms. Enoch:

1320 Braddock Place Alexandria, VA 22314

The USDA Food and Nutrition Services (FNS) would like to thank Hunger Free Vermont for their comment on our study Serving SNAP Applicants and Participants with Limited English Proficiency (LEP).

The survey does seek to address the barriers that States face in delivery of services to LEP clients and what further supports are needed for to provide translation and interpretation services. However, some questions, like average wait times for interpretation service calls and rates of dropped calls, may not be measurable because it is unclear whether States record this data. This study will seek to determine what data States do collect.

FNS agrees that the client experience is important to fully understanding how State policies and procedures for assisting those with limited English proficiency are affecting participants. However, the client experience is outside the scope of this study which, as a first step, through a survey of all 53 SNAP agencies, seeks to understand what States are doing to assist LEP participants. The survey includes questions about which vital documents are translated, why the State made the decision to translate these documents, the translation languages used, and why the State decided to use those languages. The survey includes similar questions about interpretation, including how States find qualified interpreters.

A scientifically rigorous study to understand the client perspective cannot be designed and executed without having a baseline understanding of State policies and practices, and especially what data States are already collecting about LEP applicants. The last is especially important because what data is collected and how a sample is designed is necessarily based upon what language data States are already collecting.

This study will provide FNS with a comprehensive understanding of the language landscapes in which SNAP and NAP agencies operate, as well as the LEP policy and operations landscapes. In addition, through the case studies, it will seek to understand the perspective of SNAP local agency frontline workers who may have day to day contact with LEP individuals. Data collected from this study will inform future research on client experiences. It would not be useful to ask questions about a policy if the policy is not actually applied in real world situations.

Respectfully

Eric Sean Williams, PhD Social Science Research Analyst