

Amanda Wyant
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

June 3, 2024

RE: Proposed Information Collection: Request for Comments on Evaluating the Interview Requirement for SNAP Certification Study

Dear Ms. Wyant,

The American Public Human Services Association (APHSA), as the bipartisan membership association for state, county, and city human services agencies, including those that administer SNAP, is writing today to express our support for the proposed research collection on SNAP certification interviews. Over the past several years, shifts in policy and practice have heightened the need to better understand how to continue providing accurate eligibility and benefit determination while balancing the goal of improving customer experience and access in SNAP. The COVID-19 Public Health Emergency challenged states to quickly adapt, providing safe and prompt services to households experiencing food insecurity. This included options to waive or delay interviews and encouraging telephonic and virtual modes of interviews. Additionally, FNS conducted a no-interview pilot with three state agencies in 2011. As FNS moves forward with this new study, we strongly encourage the research team to incorporate learnings from these previous demonstrations and the pandemic to ensure that this new study provides increasingly promising data to transform interview processes for the future.

APHSA specifically recommends that the research team carefully consider how each applicant and re-certifying household would be treated outside the study environment, which may mean taking a different approach than the proposed Randomized Control Trial (RCT) method. The RCT design requires strict bias mitigation to ensure households are equally subject to interviews or not, effectively removing the decision from eligibility workers. This is distinct from allowing an eligibility worker to use their contextual knowledge to determine if an interview is necessary due to questionable information or other factors based on their experience. Based on our understanding of states that participated in previous no-interview studies, they felt that the inability of eligibility workers to provide input disallowed the nuances that are required in the realistic context for SNAP application and recertification processes.

States continue to have varying opinions on when interviews should be required, highlighting the need for this study to produce findings that can inform future policy changes. In late 2020, APHSA and the Johns Hopkins Bloomberg School of Public Health conducted a survey with responses from 43 state SNAP agencies, including a question on when and how interviews should be conducted post-pandemic.¹ The responses were primarily split amongst three options: "Interviews for all certifications and recertifications, but they do not need to be face-to-face" (13 states), "Always interview new applicants, only interview recertifications in certain circumstances" (12 states), and "Interview only at client request or if questionable information merits further investigation" (11

¹ Bresnahan C, Ellison C, Green C, Headrick G, Ji Yeun Lee C, Lyons M, Moran A, Tse J. SNAP Waivers and Adaptations During the COVID-19 Pandemic: A Survey of State Agency Perspectives in 2020. Baltimore, MD: Johns Hopkins Bloomberg School of Public Health, 2021

states). These responses demonstrate the continued desire to involve eligibility workers in deciding which households should be required to participate in an interview, and making concerted decisions as to when interviews should be conducted. Thus, we recommend that this new study incorporate the ability of eligibility workers to make decisions about who should be interviewed, rather than a binary choice made by the RCT sampling method.

Thank you for prioritizing this study to better understand how SNAP can continue to evolve into a more modern, effective, and customer-centered program. For further questions or discussions, please reach out to Chloe Green, Manager of Food and Nutrition Services, at cgreen@aphsa.org.

Sincerely,



Chloe Green

Manager, Food & Nutrition Services

American Public Human Services Association



Linda Schroeder

Chair, American Association of SNAP Directors

American Public Human Services Association

