September 9, 2022

Nourish California is a statewide, non-profit organization that collaborates with diverse community partners to advance policies that ensure all Californians have equitable access to food, health, and well-being.

We recognize the root causes of hunger and poverty include the historic and ongoing harms of racial discrimination, systemic racism, xenophobia, and anti-immigrant policies.[1] To eliminate consequent inequities, communities, policymakers, researchers, advocates, and other stakeholders must be able to assess outcomes according to preferred language, among other factors. This requires meaningful measures of how well public services such as the federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP), are reaching populations with Limited English Proficiency (LEP).

This comment focuses on "ways to enhance the quality, utility, and clarity of the information to be collected"per the Federal Register (document number 2022-14662)

Language Barriers for SNAP Participants

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[1] Babey SH, Wolstein J, Shimkhada R, Ponce N. 2021. One in 4 Low-Income Immigrant Adults in California Avoided Public Programs, Likely Worsening Food Insecurity and Access to Health Care. Los Angeles, Calif.: UCLA Center for Health Policy Research. https://healthpolicy.ucla.edu/publications/search/pages/detail.aspx?PubID=2072.

Odoms-Young A, Bruce MA. Examining the Impact of Structural Racism on Food Insecurity: Implications for Addressing Racial/Ethnic Disparities. Fam Community Health. 2018 Apr/Jun;41 Suppl 2 Suppl, Food Insecurity and Obesity(Suppl 2 FOOD INSECURITY AND OBESITY):S3-S6. doi: 10.1097/FCH.0000000000000183. PMID: 29461310; PMCID: PMC5823283.

A statewide California survey, fielded in late 2021, found that one in five respondents who participated in public benefit programs experienced a language barrier when applying for SNAP (CalFresh).[2] Respondents identified a "lack of program interpreters or translated materials" and "having to rely on family of friends as interpreters" as the two most commonly experienced barriers (affecting nearly 30% of people who reported experiencing language barriers within public programs).[3] These barriers leave lasting impressions: three-quarters of individuals who experienced language barriers said it made them less likely to apply for services in the future.[4]

Input from Directly Affected Households

The survey referenced above provides uniquely valuable insights into participants' experiences of SNAP LEP policies and practices because researchers asked participants directly about their experiences with language access. Any efforts to "increase FNS' understanding of SNAP LEP access policies and practices across the nation" and "inform policymakers efforts to provide more meaningful access to SNAP," as stated in the study proposal, are inherently incomplete without considering direct input from SNAP applicants and participants.

Assessing participant/applicant experiences with SNAP LEP access will allow FNS to understand both compliance with existing policies/practices and the effects of those policies/practices on ensuring meaningful access to SNAP. We urge USDA to revise the proposed study methods by including the collection of primary data from individuals who

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[2] Fairbank, Maslin, Maullin, Metz & Associates (FM3), 2021.
https://nourishca.org/wp-content/uploads/2021/11/Hardship-and-Hope-for-Change-2021-Nourish-CA-slides-final.pdf

[3] Ibid

[4] Ibid

(1) have LEP and participate in SNAP and (2) have LEP and are likely income-eligible for SNAP.

Identifying Preferred Language and Limited English Proficiency

A "comprehensive understanding of the language landscapes in which SNAP and Nutrition Assistance Program (NAP) agencies operate" (Federal Register document number 2022-14662) requires an accurate assessment of how many SNAP applicants and participants have LEP — and the preferred languages of those individuals. SNAP administrators should attempt to explicitly collect this information from applicants/participants rather than rely on proxy metrics, including the language in which an applicant/participant opts to receive program information and case materials. Such proxies could underestimate the true number of applicants/participants with LEP because, for example, applicants/participants may request materials in English to be translated by a family member or friend.

State Specificity within a National Scope

We appreciate the nationwide scope of the proposed web survey. We urge USDA to use the survey as an instrument to identify both nationwide commonalities and unique challenges and opportunities that affect subsets of states, particularly given the incredible diversity of preferred languages across the U.S. and its territories. We also urge USDA to ensure that the selection of case studies (with respect to number and location) will encompass states that serve the majority of SNAP participants/applicants with LEP.

Thank you for your attention to this comment. If you have any questions, please contact:

Tia Shimada

Director of Programs

Nourish California

tia@nourishca.org