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RE: Understanding States’ SNAP Customer Service Strategies RFC 88 FR 25358

As the bipartisan, national membership association representing state and local human services agencies, the American Public Human Services Association (APHSA) welcomes the opportunity to inform this important and timely study on SNAP customer service and to provide comments on ways to enhance the quality, utility, and clarity of the information to be collected regarding states’ SNAP customer service strategies.

APHSA’s response draws on insights from our member engagement and relevant bodies of work detailing effective survey and research design in order to offer focused recommendations on the study’s site visit and case study interview components. As the national member-guided association for SNAP administrators, we sincerely applaud FNS’s plan to directly and authentically engage with SNAP agency staff in this effort through site visits and case study interviews. Given the strength of this study’s collaborative design—particularly between federal and state teams—APHSA is excited to share recommendations on how the research team might explore the opportunity to enhance the design of the study by involving customers.

APHSA’s Recommended Priorities for Case Studies:

1. **Center diversity and equity in case study and interview design.** APHSA recommends that the study design emphasize the tenets of an Equity, Diversity, Inclusion, and Belonging (EDIB) framework by identifying and reflecting the needs of all populations in each study site based on what is most appropriate to the state’s individual context. This should include a particular

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2 In this context APHSA defines EDIB as a framework with the goal of ensuring that all people have opportunity and access to resources while striving to identify and eliminate barriers that lead to inequitable outcomes, respecting the range of human differences, including people in a way that raises and uses each distinct voice and allows all individuals to bring their full selves to participation in society, and creating an environment in which everyone is treated and feels like a full member of the larger community and can thrive.
focus on the needs of communities who have historically not been considered in program design and benefit delivery (such as Black, Indigenous, and People of Color [BIPOC]; LGBTQ+ individuals; older adults; people with limited English proficiency; those with unreliable access to technology, such as telephones and internet; and people with disabilities). The input and experiences of these populations—both research participants and customers—should then be brought to the forefront by intentionally selecting a diverse group of case study interview participants and by posing questions and soliciting responses that aim to measure the needs and experiences of customers.

2. **Explore customer involvement mechanisms.** We recommend that FNS directly involve SNAP customers by including them among those interviewed for the case study. In the absence of incorporating customer input directly into this study’s design, we encourage FNS to explore on a parallel track how SNAP agency customers define customer service and measure customer experience. Continuous involvement of customers—applicants, current enrollees, and leavers—is essential to accurately determine what qualifies “good” and “bad” customer service. A feedback loop of refining customer service standards and developing strategies for customer feedback collection should be set in place as further data is collected from customers.

**Recommendation 1: Center a lens of diversity and equity in case study and interview design.**

Beyond general interests of equity, involving a broad variety of voices assists in identifying early indications of breakdowns in processes and procedures while providing valuable insight into aspects of customer service that are particularly effective. With the understanding that holding all identities equally in value and emphasizing individuals with lived experience only stands to enhance data collection and analysis for everyone, and with the intention of centering people who directly experience the strengths and limitations of the current state of SNAP customer service, APHSA recommends that this study take into consideration the following areas:

- **General methodology** to guide data collection most effectively;
- **Case study interview participant selection** to ensure that a broad and diverse set of experiences are reflected in the study; and
- **Case study interview prompts** to elicit responses on topics that are most impactful to customers.

**General Methodology.**

APHSA recommends that the case study methodology be adjusted to include customers among interview participants, which will both allow the collection of unique insights and align with an overall goal of inclusivity and transparency. The publication should describe the research design in detail, with descriptions of limitations and opportunities for improvements to future research activities.

- Customers from each of the nine case study states should be directly involved in shaping the understanding of “good” and “bad” customer service. While many processes are put in place or modified with the goal of improving customer experience, these developments sometimes lead to unintended consequences that cannot be identified without customer input. This can be particularly

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2 In this context, APHSA defines “individuals with lived experience” as those with direct, first-hand experience receiving SNAP.
true of populations with specific needs, such as older adults, people with limited English proficiency, those with unreliable access to technology such as telephones and internet, and people with disabilities.

- Given the limited sample size of 9 states, we recommend that case study states be selected with consideration of variables such as availability of integrated application support (e.g. if SNAP and other programs can be applied for at the same time and using the same process), state- and/or county-wide caseload size, and level of investment in technology solutions (e.g. development of mobile app support, robustness of online resources [application portal, availability of program information, online customer support options], use of Interactive Voice Response [IVR] systems, and degree of emphasis on customer self-service modalities).
- We recommend that, to the extent possible, demographic data of the case study interview participants, such as age, race, gender, and location, be collected and disaggregated in data findings.
- The published study should detail the limitations of the data collection—particularly the up to 9 state sample size—and how a diverse and representative data set was collected given these limitations.

**Case Study Interview Participant Selection.**

We encourage FNS to seek interview participants from diverse backgrounds (both on the individual and collective level) to reflect an understanding of customer service needs and standards that does not rely solely on what is considered normative or average, an approach which might overlook important insights from lesser-served populations.

- Case study interviewees should be selected in consideration of both regional and individual demographics—for example, taking care to ensure that there is representation from both urban and rural locations, as well as representation of individuals from diverse backgrounds (e.g. gender, race, native language, disability status, and political ideology).
- Selection of nonprofit interview participants should be made in consideration of their particular status and special populations they may serve. The inclusion of a variety of nonprofit types, such as Community-Based Organizations, legal aid organizations, and Federally Qualified Health Centers, will allow a broader set of customer experiences, enriching the data collected. We also recommend the prioritization of nonprofits that provide direct service to a large client base of historically underserved populations (e.g. those with various immigration statuses, formerly incarcerated, unhoused, LGBTQ+, those with limited English proficiency, chronically ill, and disabled).

**Study Interview Prompts.**

As FNS develops its plans for carrying out case study interviews, APHSA recommends including prompts that encourage interviewees to detail their specific approaches to serving particular communities at various touchpoints, including if and how demographic data is collected by those agencies and organizations. Given the growing interest in the use of automation and artificial intelligence (AI) in SNAP case management, we also encourage asking how agencies are using and developing AI technology with and for customers to improve their experience. Study planners should design prompts that:

- Encourage case study interview participants to detail how they incorporate customers and their feedback in defining and upholding customer service standards.
- Facilitate participants’ description of how specific historically underserved populations are directly supported and accommodated by the agency. Such populations might include immigrants; LGBTQ+ (particularly transgender) people; people with chronic illnesses and disabilities; and Black, Indigenous, and People of Color (BIPOC).
• Address important demographic information and circumstances that are not typically reflected in SNAP applications, such as transgender status, active crises (e.g. risk of eviction, inability to pay utility bills, or domestic violence status), and mental and physical illness status beyond enrollment in government disability benefits.

• Explore what internal measures are in place to ensure that customer service standards are adhered to and what actions are taken when standards are not met.

• Uncover if and how agencies are developing and using artificial intelligence technology such as chatbots or algorithms.

Case study interview participants, particularly SNAP directors and administrative staff, should be asked to describe what supports staff are given—and how supports could be improved—to ensure that they are providing customers with dignified, trauma-informed, culturally sensitive service. Some examples of supports might be trainings on particular special populations; Diversity, Equity, and Inclusion activities; trauma-informed care resources; technological means to accurately note important customer details (e.g. pronouns, preferred name, accommodation needs, dialect); or easily accessible customer-facing materials in various languages. This group should also be asked to describe how customers in special SNAP household circumstances are supported and accommodated, e.g. those in mixed-citizenship households, college and university students, ABAWDs, unhoused individuals, veterans, and youth who have aged out of foster care. It is particularly important to understand how these populations are served during caseworker interviews to ensure that cases are as accurate as possible.

Recommendation 2: Involve Customers in Parallel Track Research.
While developing a better understanding of standards set by state agencies is crucial, and the inclusion of not-for-profit organizations conducting SNAP outreach is promising, there is a notable lack of direct customer voice within this study. Efforts such as the proposed Understanding States' SNAP Customer Service Strategies are excellent opportunities to engage people with lived experience, who are often excluded from conversations on topics that directly impact them in favor of representatives, and to integrate their input. Customer service is by no means one size fits all - this is certainly felt by individual state agencies, but more acutely by customers, who can provide insight into which service metrics are important to them that might not currently be monitored by agencies.

To this end, should FNS be unable to integrate direct customer input into this study, APHSA encourages the exploration of a simultaneous study centering the voices of customers and their perspectives of customer service needs—an effort in which state agencies have expressed interest but have largely been unable to undertake independently. It is understood that a complete customer experience demonstration project as previously recommended by APHSA might be outside of the scope of this particular FNS activity; however, the outline of this project might be used to guide conversations with customers on a smaller scale.  

Conclusion

3 For additional information on this recommendation, see APHSA’s 2023 publication Customer Experience Demonstration Project: Understanding What Works for Individuals and Families. https://files.constantcontact.com/391325ca001/227c94fe-8aad-4013-861c-c37b828a85d9.pdf
APHSA thanks FNS for its valuable and necessary efforts to document existing and potential approaches to customer service strategies in the SNAP program. This study will provide a deeply needed and desired additional resource that stands to steer the future of evidence-based continuous improvements and innovations within the program. APHSA additionally appreciates the opportunity to offer recommendations based on conversations with its membership of SNAP administrators and other impacted populations as well as knowledge of process innovation, research design, and involvement of people with lived experience.

Please reach out to Shug Pierce, Project Associate, Process Innovation at spierce@aphsa.org with any questions or opportunities for further discussion and collaboration.

Sincerely,

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